

Modern Slavery Statement **2020**



Message from the Vice-Chancellor and President

Modern slavery can be difficult to detect because it is often hidden in legitimate businesses and industries with complex supply chains.

Understanding, mitigating and remediating the risk of modern slavery and its associated impacts on the human rights of workers is of clear importance to a research and teaching institution with a vision of creating 'knowledge leadership for a better world'.

This statement sets out the steps that The University of Queensland (UQ) is taking – or will adopt in the future – to eradicate all forms of modern slavery and human trafficking across our operations and supply chains.

At UQ, we are committed to three key undertakings as we make a meaningful contribution to eradicating modern slavery.

We will:

- invest in the organisational policy and cultural frameworks required to prevent, mitigate and where appropriate, remedy modern slavery in our operations and supply chains
- develop and implement due diligence processes to identify, prevent and mitigate the risk of modern slavery occurring in our operations and supply chains and endeavour to raise awareness of suppliers about these risks by building relationships, capacity and trust
- develop and implement processes to enable the remediation of any adverse modern slavery impacts that UQ causes or contributes to.

Due to the robust systems and governance that the University already has in place to manage recruitment and subcontracting, we are confident that the risk of modern slavery occurring at our Australian-based sites and campuses is low.

However, given the global reach of UQ, including in jurisdictions where there is a higher risk of modern slavery, we recognise that there are potential risks associated with our international activities. These risks exist in both our operational partnerships and supply chains.

At UQ, we are committed to working collaboratively with other universities, procurement bodies, and government agencies – both here in Australia and internationally – to share information and mitigate these risks. We are also committed to working with our operational partners and suppliers to identify, mitigate, and where found, remediate, modern slavery risks and practices.



This Statement represents our initial commitment to understanding more about the impact of our operations and supply chains on people – and making changes to ensure that we're protecting and upholding human rights, everywhere. It is an important document and I commend the cross-disciplinary working group who have put so much effort into developing the University's response.

I will take an active interest in ensuring that we continue to develop UQ's policy and cultural frameworks in this area, so that we are doing everything within our power to prevent modern slavery.

A handwritten signature in black ink, appearing to read 'Deborah Terry'.

Professor Deborah Terry AO
Vice-Chancellor and President

UQ's response to modern slavery – at a glance

The University's vision – to provide knowledge leadership for a better world, through educating the brightest minds and amplifying research that creates positive change – would not be achievable without upholding the highest levels of integrity and transparency in its commitment to human rights.

As a top 50 global university, UQ recognises its duty to take a robust and continued approach to addressing modern slavery risks within its operations and supply chain.

UQ is committed to ensuring that it has frameworks and processes in place to identify and minimise the risks of modern slavery in its business operations and supply chains.

Embedded within UQ's *Strategic Plan 2018–2021* are the following core values that are integral to addressing the risk of modern slavery in its operations and supply chain:

- Honesty and accountability – acting with integrity and professionalism and upholding the highest ethical standards
- Mutual respect and diversity – creating a vibrant, inclusive environment in which ideas flourish and future generations, regardless of background, are empowered
- Supporting our people – ensuring the safety and wellbeing of UQ's people.

This statement on UQ's response to modern slavery – UQ's first statement under the Act – overviews UQ and its controlled entities' operations and supply chains in the context of the risks of modern slavery and the actions taken to assess and address identified risks, and looks to measure the effectiveness of those actions (as a single reporting entity during the financial year ending 31 December 2020) under the *Modern Slavery Act 2018 (Cth)*.

At the University, staff are expected to act with integrity and professionalism and uphold the highest ethical standards.

Decisions at all levels require responsible stewardship of the University's resources, values and reputation.

The University endeavours to make an impact in the fight against modern slavery supported by significant involvement from its senior management, internal champions and its cross-functional working group throughout 2021 and beyond.

The University of Queensland

For more than a century, UQ's exceptional study experiences, research excellence and collaborative partnerships have delivered knowledge leadership for a better world.



Across UQ's three campuses at St Lucia, Gatton and Herston, our 7,200 staff and 54,900 students – including almost 20,000 postgraduates and approximately 20,000 international students from 142 countries – teach, research and study.

With a strong focus on teaching excellence, UQ attracts the majority of Queensland's high achievers, as well as top interstate and overseas students.

UQ's 287,300+ graduates are an engaged network of global alumni, who span more than 170 countries, and include more than 15,600 PhDs.

UQ consistently ranks among the world's top universities as measured by several key independent rankings, including the CWTS Leiden Ranking (31),* Performance Ranking of Scientific Papers for World Universities (39), *U.S. News Best Global Universities Rankings* (42), *QS World University Rankings* (46), *Academic Ranking of World Universities* (54), and *Times Higher Education World University Rankings* (62).



* This ranking is measured by the Impact indicator P, P (top 10 per cent), and PP (top 10 per cent) with fractional counting.

UQ's structure, operations and supply chain

University structure and governance

Founded in 1910, UQ is a body corporate governed by the *University of Queensland Act 1998 (Qld)*.

As a large institution operating across three main campuses and more than 150 research and engagement sites in Australia and overseas, effective governance is the foundation for UQ's long-term success.

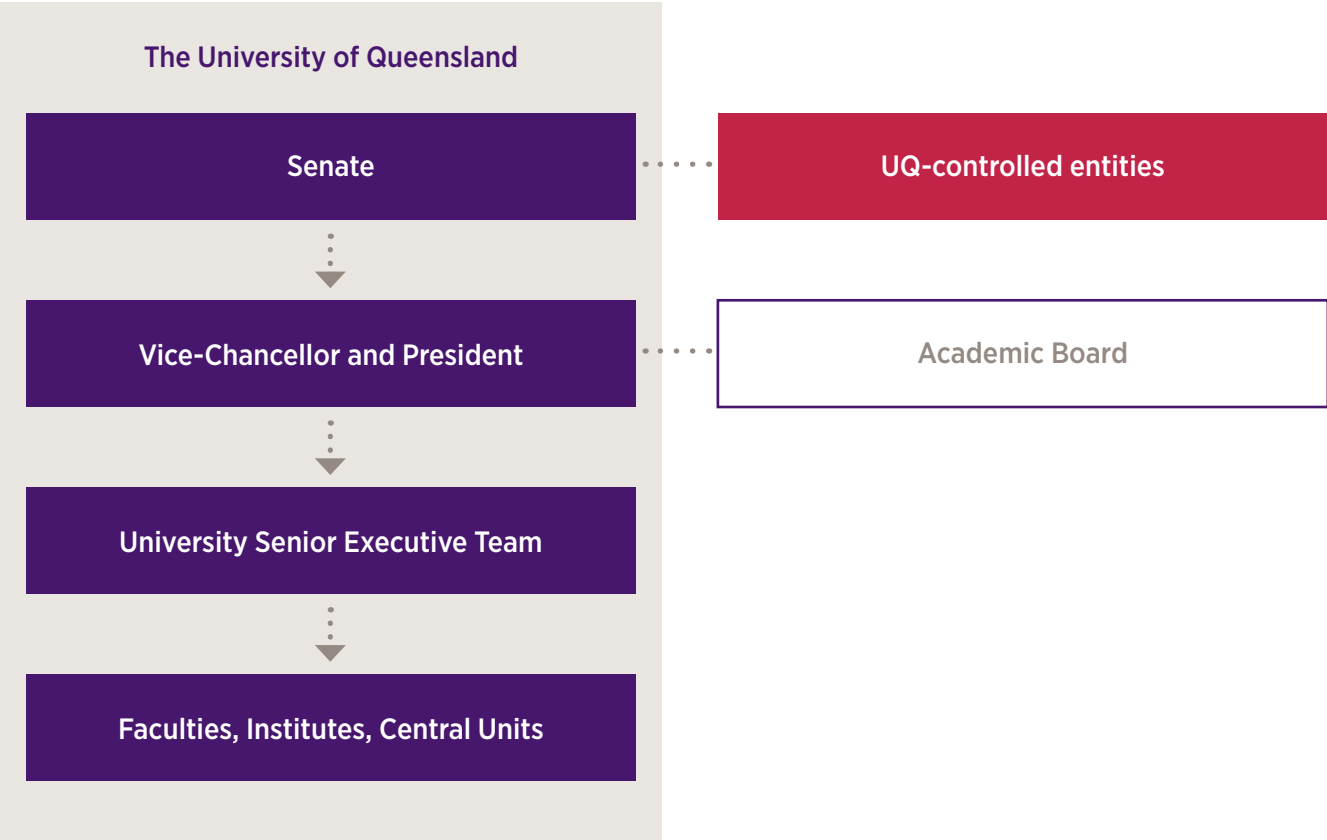
UQ is governed by a 22-member Senate. Senate is led by the Chancellor, who is elected by the Senate. The University of Queensland Act 1998 grants the Senate wide powers to appoint staff, manage and control the University's affairs and property, and manage and control finances to promote the University's interests.

The Vice-Chancellor and President is the University's chief executive officer and responsible to the Senate for the overall direction of strategic planning, finance and external affairs.

The Vice-Chancellor and President is supported by an executive team who oversee most of the University's faculties, institutes, schools, centres, and organisational units. Each member of the executive team advises on policy and administrative matters relating to their area of responsibility.

The Academic Board is the University's senior academic advisory body. The Board formulates policy on academic matters including new programs, teaching, learning and assessment, research, promotions, student academic matters, prizes and scholarships.

UQ has also established controlled entities that further the University's educational and research aims. They operate as subsidiary organisational entities to the University, but are still partly governed by the University's executive governance.



Operations

With a 2019 operating income of \$2.19 billion, including income from research investment, UQ's six faculties and eight globally recognised research institutes cover a remarkable breadth of teaching and research.

Through **UniQuest**, UQ's technology transfer and commercialisation company, UQ is also Australia's leading university **for commercialisation revenue, number of active startup companies** and value of equity held in startup companies formed from university intellectual property.

UQ is one of only three Australian members of the global Universitas 21; a founding member of the Group of Eight (Go8) universities; a member of Universities Australia and the Association of Pacific Rim Universities (APRU); and one of only three Australian charter members of the prestigious edX consortium, the world's leading not-for-profit consortium of massive open online courses (MOOCs).

The University operates in a rapidly changing environment within a global marketplace, where institutional excellence is a critical driver of reputation.

Detailed financial and operational information can be found in **UQ's Annual Reports**.

According to London Economics, the total economic impact associated with UQ's activities across Australia in 2017 is estimated at \$9.605 billion, \$3.3 billion of which comes from UQ's research which is currently conducted with 450 institutional partners in 56 countries on more than 1,400 projects.

UQ offers study and research opportunities across a wide range of disciplines, from science and sustainability to health and humanities – as well as business, education, engineering, law and more. View further details of **UQ's location, faculties and institutes**.

University income includes Government grants and assistance, student contributions through the Higher Education Contribution Scheme and Higher Education Loan Program (HECS-HELP and FEE-HELP), investment revenue, research grants and contracts, commercial contracts, bequests, donations and miscellaneous revenue.

Investments

For the year ended 31 December 2020, UQ had a total of \$707.1m in a long-term investment portfolio, known as the UQ Investment Fund, that is for:

1. external endowments received by the University, and
2. internal co-contributions towards those endowments.

The UQ Investment Fund is managed by external specialist fund managers who are required to operate within designated asset allocation benchmarks.

During this period, the University had a total of \$4.5 million in another long-term investment portfolio managed by external fund managers. Known as the UQ Socially Responsible Investment (SRI) Green Fund, this fund was established in 2016 and provides an alternative to those providing donations and bequests.

Partnerships

Engaging and collaborating with the community, industry, government and other research innovators is critical to UQ's capacity to meet the rapidly changing needs of society.

UQ has progressively built **engaged and strategic partnerships** with a broad range of local and global networks.

UQ aims to enhance its approach to external engagement with a partnership framework, customer relationship management system, deeper international connections, diverse income sources and ongoing commercialisation interests.

In 2020, UQ's operating revenue was
\$2,119,635,000

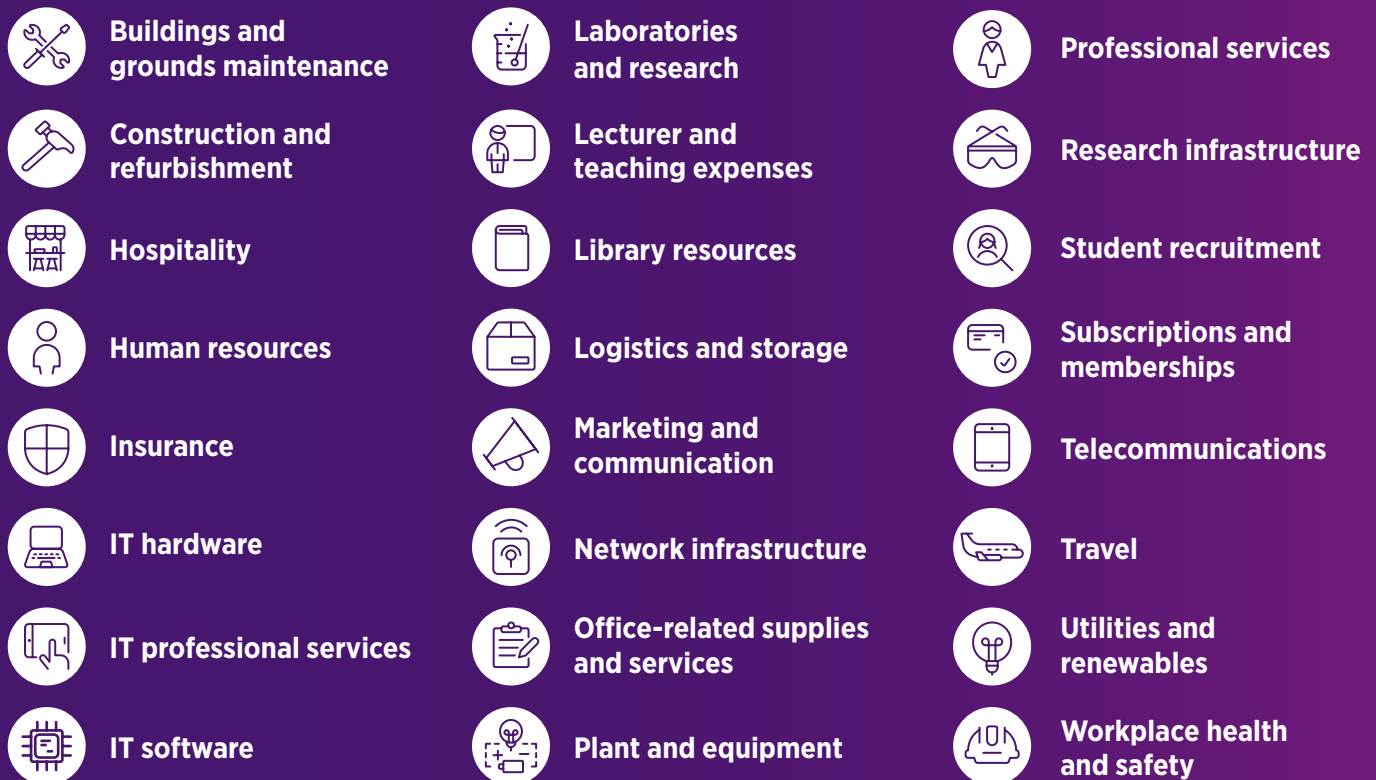
Supply chain

UQ has a diverse and complex supply chain.

In addition to standard procurement required to support university operations, UQ's supply chain also consists of downstream partners (for example, subcontractors and recipients of UQ grant money) engaged to support delivery of international development and research programs overseas.

The supply chain includes research institutions and universities, consultancy firms, local suppliers, self-employed consultants, travel and accommodation providers, security firms, and suppliers of medical and IT equipment and consumables.

UQ procures goods and services across the following broad procurement categories¹



¹ Australian University Procurement Network category taxonomy (Level 2 adapted for UQ purposes)

COVID-19: impact and response

Universities are places where staff and students live, work and study in close proximity with each other, and cultural hubs where staff and students thrive by networking and collaborating with colleagues and peers from nations around the world. Like most organisations globally, the coronavirus (COVID-19) global pandemic significantly disrupted the UQ community's work, study and campus activities during 2020.

UQ acknowledges that some members of its community and workers in its supply chain may have become more vulnerable to modern slavery due to the effects of the pandemic. For example, some students lost their usual source of casual employment income, particularly in the hospitality industry, which has been significantly impacted. To compound this stress, many of UQs international students were not just unable to find work, but they were also ineligible for Australian government assistance programs, and their own families were also, often adversely impacted by the pandemic.

As part of its response to the COVID-19 pandemic, UQ delivered significant additional support services to vulnerable students, who were left without means of support for their day-to-day needs.

These services targeted the financial, mental health and general wellbeing support required by students, particularly international students, who found themselves isolated and in many cases without their usual source of income. By providing this support UQ was able to alleviate pressure on these students to engage in sub-optimal employment arrangements.

While modern slavery was not the primary driver for designing and delivering these services, the support provided to students undergoing financial hardship assisted with managing financial crisis to some extent which is a key driver of modern slavery.

Due to travel restrictions, UQ was more reliant on offshore partners and collaborators during 2020 than it had been previously. This presented an increased risk in modern slavery in some areas of operations. Rather than being able to supervise and inspect overseas suppliers and contractors in person, UQ needed to rely on external parties to work on its projects and commercial contracts to deliver to its commitments.



UQ volunteers delivered care packages and vital essentials to students during the pandemic lockdowns in 2020.

Without this direct oversight, it became more difficult for UQ to ensure that their practices aligned with those of UQ.

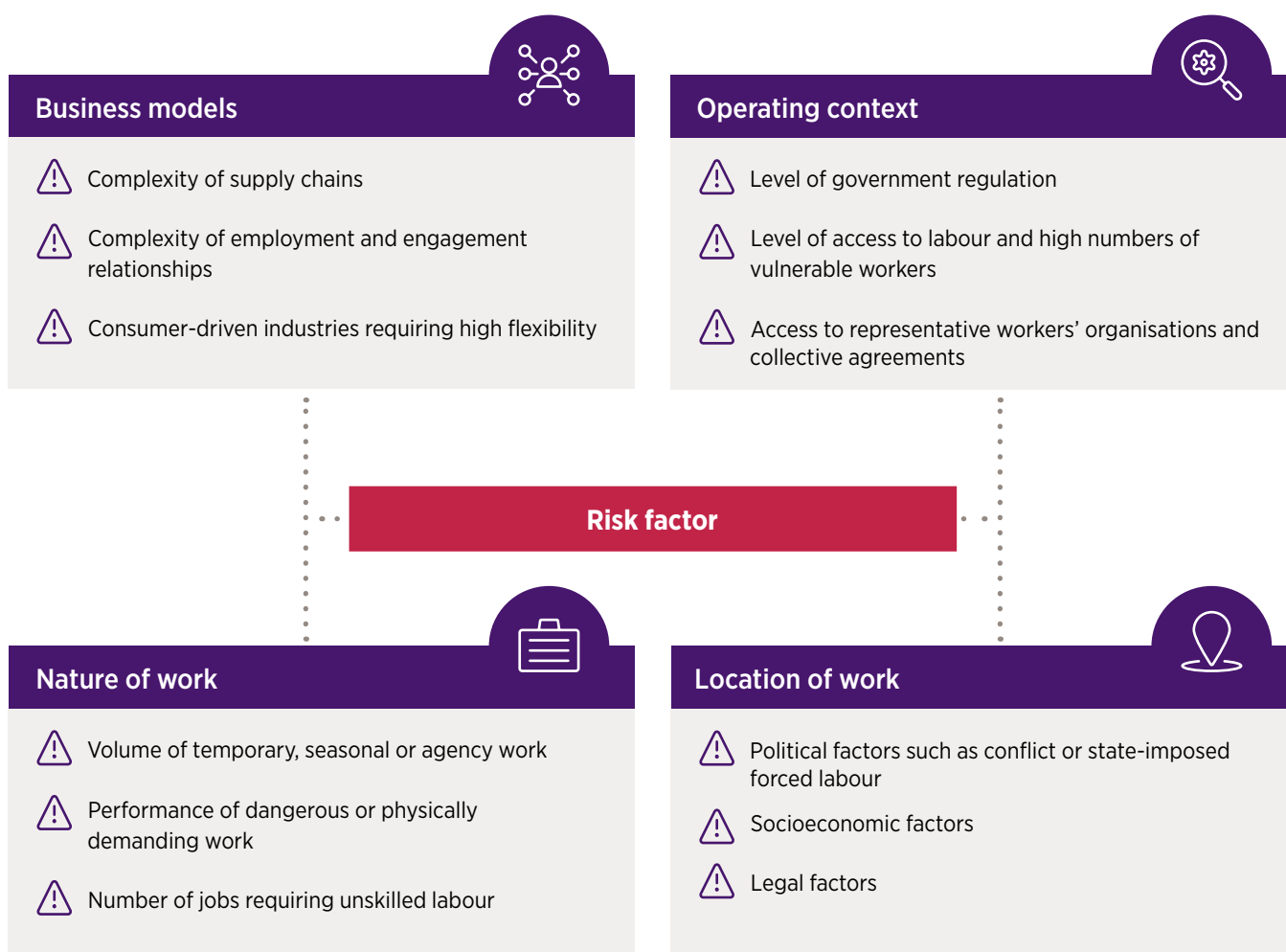
Additionally, the rapid transition to online service and business delivery, and equally rapid decision-making as a result of constantly changing requirements resulting from the pandemic, meant that UQ's processes and business activities may not have been subject to the same level of governance and rigour as they would be in a standard year.

During 2020, UQ also established new supply chains to source personal protective equipment, which were under increased global demand. As part of this process, UQ has obtained greater understanding and clarity of its supply chain for these items, some of which are manufactured in potentially high-risk industries. For instance, there were media reports of allegations of modern slavery practices at a key global glove supplier.²

²In mid-2020 Top Glove, a key rubber glove manufacturer, was alleged to have been associated with modern slavery practices; see [abc.net.au/news/2020-07-20/gloves-malaysia-forced-labour-us-detention-order-australia/12292708](https://www.abc.net.au/news/2020-07-20/gloves-malaysia-forced-labour-us-detention-order-australia/12292708)

Risks of modern slavery in UQ's operations and supply chains

The following risk factors are considered to contribute to modern slavery.³ UQ has used this as a **risk model** – outlined on the following pages – to determine where operations and supply chains may present modern slavery risks.



UQ has considered each of these risk factors in the context of its operations and supply chains to identify areas where further risk assessment and remediation efforts will have the most impact.

While poor practices, particularly labour practices, do not themselves necessarily constitute modern slavery, they can push workers into conditions of modern slavery if continued or combined.

As modern slavery is essentially an issue of workers' rights, UQ has focused on understanding employment and engagement arrangements within UQ's operations and supply chain.

In doing so, five broad categories of workers have been identified. Below is a summary of UQ's overarching approach to mitigating modern slavery risks for these categories of workers. This approach feeds into UQ's actions to assess and address modern slavery risks outlined on page 18 within this statement.






³ Adapted from *Addressing Modern Slavery: A Guide for Australian Businesses*; Australian Red Cross

UQ has existing policies and procedures which incidentally act as modern slavery mitigation approaches in the context of the categories of workers with whom UQ has a direct relationship: employees, students undertaking work integrated learning and UQ volunteers. UQ considers there to be low or no risk of modern slavery being experienced by these workers.

In the case of those categories of workers whose relationship

with UQ is more removed; contractors, supply chain workers and volunteers engaged by partner entities of UQ, action may be required to better understand and assess the relevant risk and put in place mitigation controls where these are identified as being necessary and effective.

Those actions are further articulated on page 18. Not all required action is planned for 2021.

 <p>Employee</p>	<p>UQ's mitigation approach</p>	
<p>Workers directly engaged by UQ in its operations</p>	<ul style="list-style-type: none"> Follow standard, rigorous UQ recruitment processes. Provide worker grievance mechanisms. Support and uphold principles of non-discrimination and equal opportunity. Do not place restrictions on freedom of association and collective bargaining. 	
 <p>Student Work Integrated Learning</p>	<p>UQ's mitigation approach</p>	
<p>Workers who are generally unpaid, but undertake work either to meet a degree milestone, or scaffolded in an employability framework, with some active supervision (common requirement of professional practice degrees, and a way for students to gain workplace experience)</p>	<ul style="list-style-type: none"> Screen host organisations before placements are opened for applications. <p><i>Note: Students may identify their own opportunities abroad, if it is in their home country, and the host organisation is screened.</i></p>	Existing
 <p>Volunteers</p>	<p>UQ's mitigation approach</p>	
<p>Community members who donate their services without expectation of remuneration</p>	<ul style="list-style-type: none"> Ensure that volunteers are not directed to perform work that would usually be undertaken by employees. 	
 <p>Contractors</p>	<p>UQ's mitigation approach</p>	
<p>Workers who are engaged to provide services to UQ by contract (often engaged via third parties such as labour hire agencies)</p>	<ul style="list-style-type: none"> Use procurement governance to ensure third parties who engage contract workers for UQ are reputable and responsible entities, with appropriate management systems that guard against forced labour or employment of trafficked persons. Use practices for managing and monitoring the performance of third-party agencies on labour issues, including incorporating into contractual arrangements where feasible. Ensure that contracted workers have access to grievance mechanisms. 	
 <p>Supply chain worker</p>	<p>UQ's mitigation approach</p>	
<p>Workers whom suppliers engage to provide goods and services to UQ – may be engaged either directly or as contract workers by a supplier</p>	<ul style="list-style-type: none"> Develop risk assessments to identify where UQ's primary supply chain presents higher risks of modern slavery or forced labour. If any modern slavery or forced labour instances are identified, take steps to remedy these in collaboration with the supplier. Where remedy is not achievable, move the University's primary supply chain to reduce the risk of forced labour. Monitor the primary supply chain to identify significant movement in risks. 	Developing

Operations

During 2020, UQ undertook discovery work, including questionnaires and follow-up interviews with organisational units and controlled entities, to understand and assess where and how its operations may be exposed to modern slavery risks (based on its Risk Model), and to identify existing controls that are in place to manage these.

UQ's primary operations, based in Australia, are subject to a strong regulatory framework which guards against the risk of modern slavery. However, some areas that are more removed from the benefits of that regulatory framework are potentially at risk of modern slavery (or its early indicia – forced labour).

Operational activities that pose a risk	
Activity	Overview
International research, commercial project and teaching collaborations	<ul style="list-style-type: none"> • Encompasses a wide range of UQ activities, as UQ has many teaching, research and commercial partnerships globally. • Teaching collaborations are typically with leading universities, so exploitative relationships are unlikely. • Most research relationships are with established universities, government agencies, or multinational corporations and are also viewed as low risk. However, engagement with community groups and non-government organisations in research areas like agriculture and mining do expose UQ to the risk of forming partnerships with organisations that use exploitative practices. • Commercial projects and consultancies need more discovery work as they are less regulated than teaching and research partners.
Activities that employ a volunteer workforce	<ul style="list-style-type: none"> • Includes workers volunteering their time and services to UQ in order to build their skills and extend their personal and professional network. • May not have the same protections as a UQ employee and has potential to be regarded as exploitative business practice if used as a substitute for paid employment, particularly in international jurisdictions.
Student work experience activities	<ul style="list-style-type: none"> • Includes students exploring internship opportunities at local and international businesses, and at UQ, to apply and contextualise their studies in an organisational environment and gain a competitive edge in the job market. • Students are particularly vulnerable to being exploited in the workplace, especially those who have fewer immediate support networks, lower English language proficiency, or are unaware of the workforce laws in Australia. • This poses a low risk due to the regulatory frameworks in place in Australia, and UQ's robust student placement framework, which includes partner screening and agreements.

Supply chain

UQ generally sits at the top of the supply chain, often several tiers removed from raw materials production, so mapping the entire supply chain is challenging.

To understand how the supply chain could be impacted by modern slavery, UQ has collaborated with the Australian University Procurement Network (AUPN) on the sector-wide program of works relevant to addressing modern slavery in the tertiary sector. As many suppliers across the university sector are common, participation in the AUPN efforts will assist UQ in collaboratively mapping its supply chain.

UQ also captured and developed a repository of external resources to inform and validate the preliminary supply chain risk identification.

UQ is working progressively to build a more complete picture of its supply chain. This includes creating a procurement spend dashboard and engaging staff who will be responsible for the management and analysis of UQ's procurement data.

In its preliminary review of the potential risk of modern slavery practices across the supply chain for UQ and its controlled entities, UQ used two key indicators (based on its Risk Model):

Spend category

Certain sectors and industries may have high modern slavery risks due to their inherent characteristics, products and processes. For example, extractives, textiles, fashion, fishing, electronics, cleaning and agriculture are recognised as high-risk industries globally.

Country of supplier

Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.

UQ's procurement spend of



Top supply chain categories by value of spend included:



⁴includes procurement spend facilitated by UQ purchase orders, UQ corporate credit cards, bulk voucher spreadsheets and expense reimbursement.


Results of this preliminary spend, supplier and category risk analysis will inform UQ's ongoing modern slavery risk assessment and management approach, internal stakeholder training and supplier engagement strategy for 2021 and future years.

To identify the following higher risk categories of spend, UQ has relied upon publicly available information as well as applying the Risk Model detailed in this statement.

Buildings and grounds maintenance




- Cleaning services
- Building maintenance services


 Key modern slavery risks relevant to most sectors are found in services procurement, particularly where this intersects with base-skilled labour.

Hospitality



- Catering


 The supply chains of the food, beverage and agriculture sector have a high risk of modern slavery due to the nature of the work necessary in the production, processing, packaging and transport of food and fibre.


 Modern slavery risks are mostly present during the production, packaging and processing stages, which is when the highest amount of seasonal, base-skilled labour is required. The short-term nature of the work also attracts migrant workers.


Construction and refurbishment



- Heavy construction services

 The vertical integration of many property-sector companies across both development and management creates exposure to modern slavery risks in construction and the procurement of services related to property management.


 Within the construction industry's highly competitive and cost-driven bidding process, social risks (including modern slavery and other human rights issues) are not necessarily prioritised in procurement risk frameworks.

 Australian construction companies commonly source raw building materials from countries considered high risk for modern slavery.

IT hardware / Telecommunications



- Desktops/laptops/tablets
- AV hardware, maintenance and repairs
- IT consumables and accessories
- IT support (infrastructure)
- Multifunction device printers and consumables
- Mobile phones

 Modern slavery risks are most prevalent in the raw material extraction, manufacturing and disposal stages that often attract vulnerable populations in high-risk geographies.

Laboratories and research



- Laboratory supplies and consumables
- Research expenses
- Animal research supplies and services, live animals
- Garment and textile laundering
- Glassware and plasticware
- Laboratory chemicals
- Drugs and pharmaceuticals

- ⚠ The potential exposure to modern slavery is heightened when purchasing goods and services from third-party suppliers.
- ⚠ The lack of visibility of how direct suppliers manage ethical issues on behalf of their customers creates opaque structures that require further due diligence.

Research infrastructure



- Research, benchtop scientific, medical and engineering equipment
- Microscopes, optical equipment and spectrometers

- ⚠ Medical goods and research equipment sourced in high-risk countries are a primary challenge.
- ⚠ The broader life sciences sector faces significant human rights challenges in pharmaceuticals, medical device manufacturing, as well as biotechnology. These include workers' exposure to toxic materials, unfair wages, failure to obtain proper consent in clinical trials, and forced labour in production of raw materials for medical devices.
- ⚠ Surgical instrument production may involve the use of third-party labour arrangements.

Marketing and communication



- Event supplies
- Marketing and promotional materials
- Outsourced printing

- ⚠ Extensive evidence exists of human rights issues in the merchandise industry.

Workplace health and safety



- Hygiene supplies (face masks, gloves, gowns, coveralls etc.)

- ⚠ Exploitation in the production of hygiene supplies is well documented and carries particular slavery risks.

Office related supplies and services



- Kitchen supplies
- Stationery

- ⚠ Typically, this sector is:
 - informal and unregulated, with poor visibility over lower tier suppliers
 - reliant on a workforce to carry out jobs that are considered undesirable, hazardous or low-skilled
 - seasonal and low-paying.

Existing controls

UQ has an established set of policies and procedures that governs the way it operates. These are relevant to how UQ manages potential human rights issues in its operations and supply chain. While these policies do not necessarily directly refer to modern slavery, they do address common vulnerabilities and power imbalances that are relevant to combating it.

These policies and procedures include:

UQ Governance and Management Framework Policy

demonstrates the UQ Senate and management's commitment to the effective and efficient governance and management of the University.

Code of Conduct Policy sets out the ethical principles that the University requires staff members to comply with in the performance of their roles at the University. UQ has a zero tolerance for intentional and material breaches of UQ Values and Code of Conduct. University staff are required to draw on evidence and reason in their decision-making to establish probity when taking actions to realise the University's purpose.

Enterprise Risk Management Framework Policy provides the overall framework, direction and oversight for the systematic, disciplined and consistent identification and assessment of risks (including opportunities) and for their effective and efficient management. UQ adopts an enterprise approach to risk management and ensures its risk management framework, processes and practices recognise the impact of human, cultural and environmental factors on University objectives.

Procurement Policy aligns with and implements UQ's obligations under the Queensland Procurement Policy (QPP).

UQ's key procurement objectives include engaging in economically, socially, environmentally and ethically responsible procurement (sustainable purchasing), purchasing only from reliable and reputable suppliers and supply chains that are consistent with UQ's responsible and sustainable purchasing principles, and not engaging with suppliers who have supply chains that utilise modern slavery. Probity, ethical considerations and social responsibility remain integral components OR are integral to UQ's procurement culture.

Health, Safety and Wellness Policy establishes the University's overall health, safety and wellness objectives and demonstrates the Senate's and the Vice-Chancellor and President's commitment to continual improvement of UQ's health and safety performance.

Prevention of Discrimination and Harassment Policy outlines the University's commitment to ensuring that staff, students and visitors are not subjected to behaviours, practices or processes that may constitute discrimination, harassment, workplace bullying, vilification, or victimisation. The procedures attached to this Policy outline the options available to staff and students who believe they have been subjected to discrimination, harassment and/or workplace bullying.

Fraud and Corruption Management Policy recognises that the University has a zero-tolerance stance on fraud and corruption and is committed to maintaining an organisational culture that will ensure that effective prevention of fraud and corruption is an integral part of all university activities, consistent with its **Code of Conduct** and the law. Staff members and students may report suspicions of fraudulent or corrupt activities and are provided legislative protection.

Sustainability Policy covers adopting applicable undertakings to ensure sustainability is embedded in the University's teaching, research, engagement and operational activities across all its campuses to foster a culture of sustainability that supports global priorities.

Environmental Management Policy offers guidance to stakeholders in meeting legislative and governance requirements of environmental management.

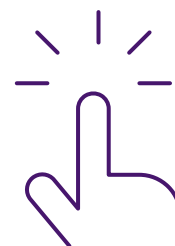
University of Queensland Enterprise Agreement 2018-2021 is UQ's current enterprise agreement and clearly sets out working conditions and entitlements for eligible staff and language teachers. UQ's enterprise bargaining process is regulated by the **Fair Work Act 2009 (Cth)**.

Delegations Policy and **Financial and Contract Sub-delegations Procedure** requires that UQ contract sub-delegates consider probity issues and undertake an appropriate level of pre-contract due diligence before binding the University to a contract.

Work Integrated Learning and Work Experience Policy and Procedure provides a framework for managing the engagement of students in work-based learning experiences for educational benefit.

Volunteers Policy outlines appropriate engagement of community members who provide their services to the University in a voluntary capacity.

The University also undertakes a variety of governance activities such as conducting due diligence of its downstream partners and ethics approvals for research initiatives. The nature and extent of those activities and potential impact of the related controls on identifying, assessing and mitigating modern slavery risks need to be explored and understood in detail. This is reflected in the action plan for 2021 and beyond.



Actions to assess and address modern slavery risk

In 2020, UQ conducted exploratory investigations to understand potential modern slavery risks in its operations and supply chains, and those of its controlled entities. The below actions are a result of this work.

Management support – senior leadership engagement

- Stakeholder engagement
- Capability building

Actions during the reporting period (2020)

- Modern slavery briefings provided to governance bodies including the Vice-Chancellor's Risk and Compliance Committee, University Senior Executive Team and Senate Governance Committee.

Plan for 2021 and beyond

- Continue regular education and engagement activities with senior management.
- Provide regular updates to UQ governance bodies.

Modern Slavery Working Group

- Stakeholder engagement
- Capability building
- Monitoring and reporting

Actions during the reporting period (2020)

- Established a cross-disciplinary working group comprised of senior representatives across various functional areas including governance, research, student affairs, legal, procurement, international development and marketing divisions to oversee and address modern slavery risks across UQ's operations and supply chains and act as the peak stakeholder engagement body.
- Working group leading UQ's response to modern slavery.

Plan for 2021 and beyond

- Embed cycle of UQ's modern slavery statement production into annual calendar of work.
- Review membership of working group to ensure relevancy.

Operational risk identification, prioritisation and management

- Risk assessment
- Monitoring and reporting

Actions during the reporting period (2020)

- Commenced discovery of UQ's operations and those of UQ Controlled entities to understand and assess at an overarching, thematic level whether UQ and its controlled entities may be exposed to modern slavery risks through their operations.

Plan for 2021 and beyond

- Periodically request UQ Fund Managers for their Environmental, Social and Corporate Governance (ESG) policy/framework.
- Identify gaps from the discovery work and conduct further due diligence on areas identified as high risk.
- Where high risk areas are identified, develop and implement targeted education and engagement activities to lift knowledge and awareness of these risks.
- Identify other governance activities across the University with potential impact on modern slavery risk mitigation.

Remediation

- Grievance mechanisms
- Remediation

Actions during the reporting period (2020)

- Developed initial understanding of existing pathways which could be used to report complaints and concerns.

Plan for 2021 and beyond

- Create a repository of clearly articulated pathways to capture modern slavery complaints and concerns.
- Incorporate into any internal education and engagement materials.
- Incorporate clauses with suitable dispute resolution provisions into new supplier contracts.
- Develop a practical operational program of action to address remediation of harm when incidents of slavery-like practices are found.

- Risk assessment
- Supplier engagement
- Monitoring and reporting

Supplier risk identification, prioritisation and management

Actions during the reporting period (2020)

- Reviewed the nature of UQ's procurement spend and that of its controlled entities.
- Undertook a preliminary review of the potential risk of modern slavery practices across the supply chain.
- Incorporated modern slavery contract clauses into refreshed templates for invitation to tender and general goods and services contract.

Plan for 2021 and beyond

- Design and implement supplier engagement and awareness initiatives based on risk assessment as part of enhanced due diligence activities.
- Review supplier invitation materials and incorporate modern slavery contract clauses into new contracts.
- Develop and socialise a Suppliers' Code of Conduct (or similar) outlining UQ's expectations from its supply chain.
- Improve local buy protocols thereby encouraging and supporting local suppliers to supply to UQ.
- Review opportunities for including modern slavery due diligence into contractor and supplier onboarding and management processes.

Education, training and capability uplift

- Capability building

Actions during the reporting period (2020)

- Engaged senior management and raised awareness on modern slavery within UQ organisational units and UQ controlled entities as part of the discovery work.

Plan for 2021 and beyond

- Undertake dedicated training efforts aimed towards improving knowledge and awareness of modern slavery issues within the University.
- Develop appropriate guidance material and training programs for the UQ buying community to assist with identification of high-risk areas and approaching those effectively.

Sector-wide collaboration

- Risk assessment
- Capability building
- Remediation

Actions during the reporting period (2020)

- Participated in the University sector collaboration program led by the AUPN to support member universities to meet the challenge of human rights transparency and risk management in their supply chains and contribute to the fulfilment of members' reporting requirement under the Act.

Plan for 2021 and beyond

- Further engage with the AUPN to improve operational efficiencies of the collaboration, increase effectiveness in mitigating risk and understand social performance within sector supply chains. This may involve working with other member universities to carry out a joint assessment of high-risk areas of a specific supply chain.

Governance, Risk and Policy framework

- Governance framework

Actions during the reporting period (2020)

- Desktop examination of existing UQ policies and procedures that can be leveraged.

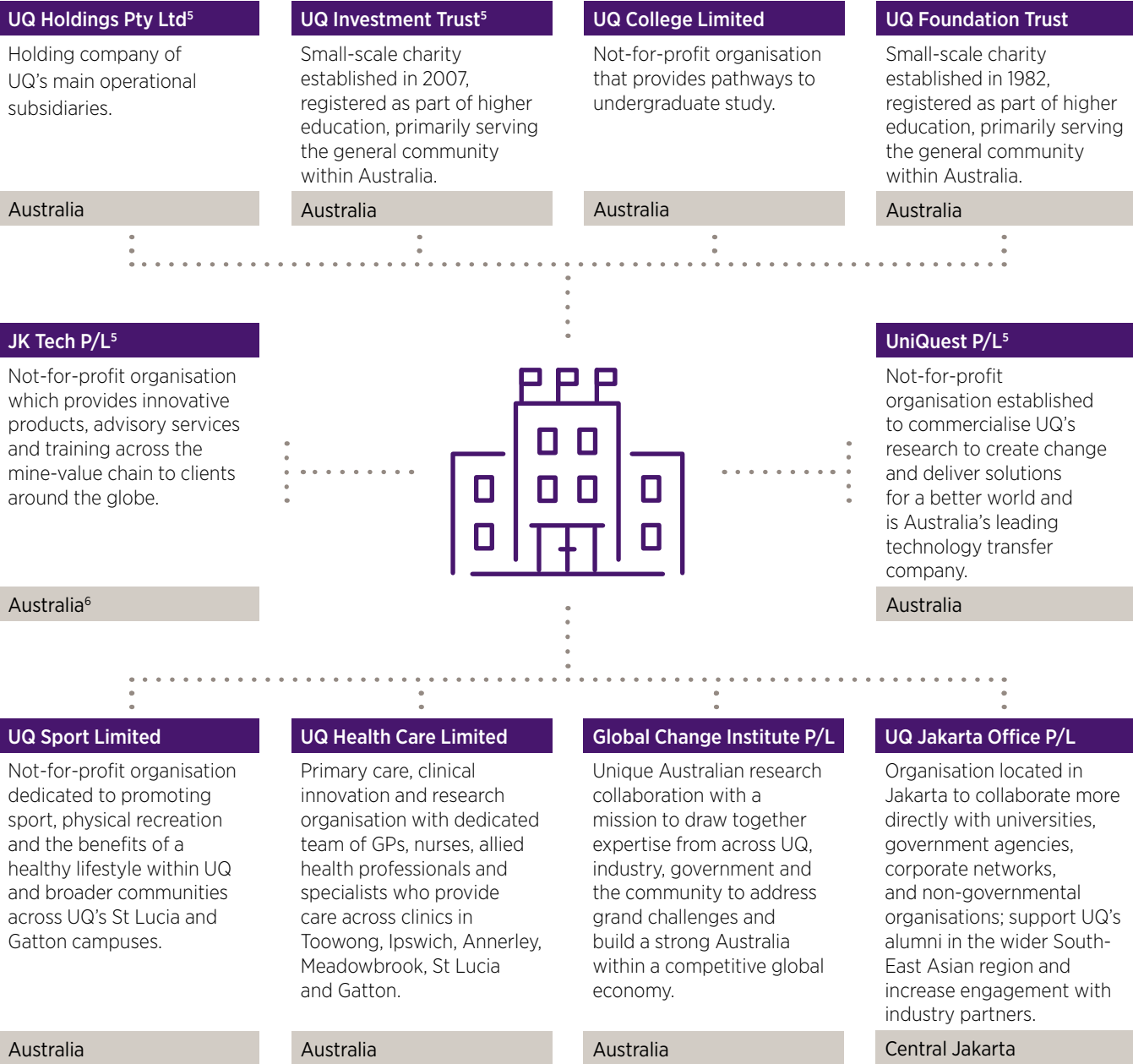
Plan for 2021 and beyond

- Engage with policy owners and their key stakeholders to understand how relevant policies are understood and implemented at UQ.
- Ongoing review and improvement of policies, procedures and processes to increase their effectiveness in helping to manage UQ's modern slavery risks.
- Investigate how modern slavery risk management can be integrated into UQ's enterprise risk framework.

UQ controlled entities

Overview


In accordance with the *University of Queensland Act 1998*, the University has established controlled entities that further the University’s educational and research aims. These include:




⁵ This controlled entity is also a parent company to other subsidiaries

⁶ JK Tech P/L’s subsidiary is established in South America


Key insights on modern slavery risks and controls

 Generally, UQ's controlled entities operating within Australia access the supply chain and procurement categories used by the broader University. The supply chains associated with the procurement of goods by some of UQ's controlled entities may require detailed risk assessment.







 Further due diligence on the operations of the controlled entities will be conducted in 2021 and beyond. From the initial discovery work conducted, controlled entities have not identified risks that are materially different to those of UQ's own operations and supply chains.

Where research collaborations are a part of the entity's operations, these are governed by established frameworks and agreements including periodic reporting mechanisms.

The University acknowledges the potential of a slightly elevated modern slavery risk profile for controlled entities and their subsidiaries operating outside Australia, i.e. within international jurisdictions including Indonesia and South America. Further due diligence is proposed to be conducted for operations and supply chains within these higher-risk geographies.

 UQ's Procurement Policy applies to all its controlled entities.

UQ Holdings Pty Ltd was created by the UQ Senate to oversee and monitor UQ's interests in controlled entities. This includes:

-  implementing strategic guidance provided by the Vice-Chancellor and President pertaining to the controlled entities;
-  providing effective oversight of UQ's commercial activities in controlled entities so as to optimise the value and contributions from their activities and assets within UQ's Risk Appetite Statements and enterprise risk management framework, and comply with laws and applicable UQ governance frameworks
-  reviewing activities, systems and processes to achieve effective governance and operating efficiencies across controlled entities
-  engaging with UQ to ascertain priority areas of focus for controlled entities
-  providing regular reporting to UQ on the activities and outcomes of controlled entities
-  assessing performance of controlled entities and providing assurances to UQ as to their financial position and solvency.

Consultation

During the reporting period, UQ consulted with its controlled entities to engage and educate them on modern slavery risks. This included sending discovery questionnaires and sharing relevant information with senior management of these entities to raise awareness on modern slavery risks and make them aware of UQ's efforts in this space.

UQ plans to run a broader awareness campaign for UQ controlled entities during 2021 as part of broader engagement and education with staff across UQ.

Assessing effectiveness

Addressing modern slavery risks can be a complex and challenging process, particularly given that the risks evolve and change frequently in response to global issues.

However, UQ acknowledges how important it is to measure and assess its actions and their effectiveness, so it can continue to improve its processes, measurement tools, and outcomes-focused performance indicators with an intention to continually minimise the risk of modern slavery practices in UQ's operations and supply chain.

Broadly, UQ will continue to strengthen and refine its response to these risks, recognising that this is not a static process.

During the reporting period, UQ has already begun building an initial foundation and framework to assess and mitigate modern slavery risks, both in its own operations and supply chain, and those of its controlled entities.

An initial Modern slavery progress tracker has been developed based on the actions to assess and address modern slavery outlined on page 18.

Given that this is a new and challenging initiative, it is not yet possible to measure the effectiveness of these actions; however, UQ intends to continue on this trajectory, and importantly, continue to educate and train its staff, suppliers, and other stakeholders to remain alert to these risks.

This may involve incorporating regular monitoring and auditing into an internal audit program of work.



Informal – ad hoc/
incidental/inconsistent

Documented – emerging/
managed/standardised/
repeatable

Integrated – structured/
measured/disciplined/
competent

Proactive – continuous
improvement/adaptive/
innovative

Policy commitment

Policy commitment to meet UQ’s responsibility to take steps to prevent, mitigate and, where appropriate, remedy modern slavery in UQ’s operations and supply chains.

Modern slavery due diligence

Develop and implement a modern slavery due diligence process to identify, prevent, mitigate and account for how UQ addresses its impacts on modern slavery risks.

Remediation framework

Develop and implement processes to enable the remediation of any adverse modern slavery impacts UQ causes or to which UQ contributes or is directly linked to.

This Modern Slavery Statement was approved by The University of Queensland Senate at its meeting on 13 April 2021.

Where information in this document conflicts with any other version, the latest version approved by the University Senate shall prevail.

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