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ACKNOWLEDGEMENT OF COUNTRY AND TRADITIONAL OWNERS MONASH UNIVERSITY recognises that its Australian campuses are located on the unceded lands of the people of the Kulin Nations, and pays its respects to their Elders, past and present. Monash is committed to fostering a society that recognises, respects and includes Indigenous peoples, cultures and knowledge. The University contributes to the creation of this society by working with and celebrating Aboriginal and/or Torres Strait Islander peoples, cultures and knowledge, as well as Indigenous peoples of other places where Monash has a campus or major presence.



Monash University is committed to actively seeking out and eliminating modern slavery within our global operations, investments and supply chains.

Our 2024 Modern Slavery Act Report is Monash's fifth such report in our continuing effort to enhance transparency and address modern slavery.

This year we have further increased our supply chain transparency through both internal and third-party work, better allowing us to focus our efforts where they are most needed.

Monash has an unwavering commitment to human rights and responsible business practices, bolstered by our Environmental, Social and Governance reporting framework and our support for the United Nations' 17 Sustainable Development Goals, including the ending of modern slavery, all of which are embedded in the University's *Impact 2030* strategy. The framework and strategy shape our decisions and inform our daily operational practices.

Monash was founded to realise social and technological transformation to meet the challenges of the age for the aspiring communities around us. These communities, and our responsibilities, extend to all our operations, investments and supply chains wherever they may be.

Professor Sharon Pickering Vice-Chancellor and President



ABOUT THIS REPORT

Modern slavery is a pervasive problem that requires robust solutions based on collective action to generate change in global practice. Modern slavery refers to situations where threats, coercion or deception are used to undermine one's freedom and to inflict exploitation. These practices can include human trafficking, slavery, debt bondage, forced labour, the worst forms of child labour, domestic servitude, and forced marriage.

Modern slavery around the world

The victims of modern slavery worldwide are estimated to number 49.6 million people daily — nearly one in every 150 people. A total of 27.6 million victims are in forced labour on any given day, generating an estimated US\$276 billion in illegal profits annually¹.

Modern slavery within Australia

Over the 2023-24 financial year, modern slavery reports made to the Australian Federal Police within Australia increased by 12 per cent² and were comprised of:

- 109 reports of human trafficking (inclusive of entry, exit and child trafficking)
- 91 reports of forced marriage
- 69 reports of forced labour
- 59 reports of sexual exploitation
- 21 reports of domestic servitude
- 10 reports of debt bondage
- 16 reports of deceptive recruitment
- Four reports of slavery
- · Two reports of harbouring
- One report of organ trafficking.

This hidden, large-scale exploitation within global and local communities often harms those least able to defend themselves and those least protected by policy and law.

This report demonstrates how Monash is working to identify the risks of modern slavery in our operations, investments and supply chain, and the actions we have taken to address those risks. These are part of our five-year continuous improvement program to systematically reduce and eliminate modern slavery within our operations and supply chain.

This is Monash University's fifth report under the *Modern Slavery Act 2018 (Cth)* (the Act).

This report was approved by Monash University Council in its capacity as principal governing body of Monash University, on 4 June 2025. Vice-Chancellor and President, Professor Sharon Pickering, is the responsible member.

¹ International Labour Organisation Global Estimates of Modern Slavery, viewed 7 February 2025.

² Australian Federal Police World Day against trafficking in persons, viewed 7 February 2025.



OUR COMMITMENT

We are committed to actively contribute to a future without modern slavery.

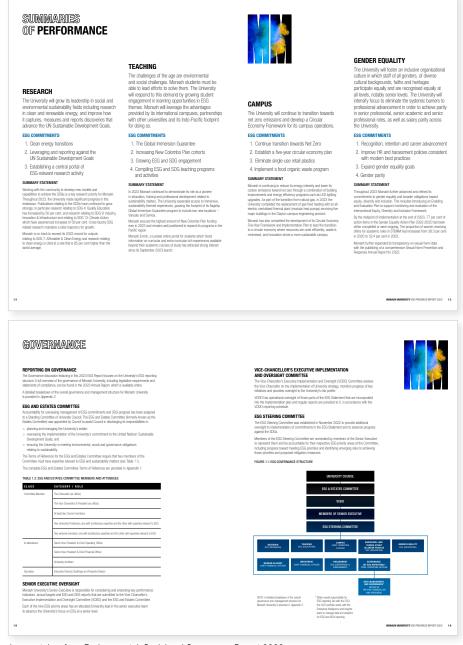
Monash University supports human rights within its operations, investments and supply chain in full compliance with the Act. This is supported by an **Environmental, Social and Governance (ESG) Statement 2021–2025**, and a five-year program of reduction and elimination of modern slavery. These commitments are also further highlighted as part of Monash University's annual **ESG reporting** and **Sustainability Development Goals** programs.

Our program for the reduction and elimination of slavery has significant leadership support, including from the Vice-Chancellor's Group, the University ESG and Estates Committee, and the University Council.

As a global leader in research and education, Monash University welcomes feedback and/or questions, or the opportunity to provide additional information concerning this report or modern slavery. Please contact **sustainable.procurement@monash.edu**.

This report outlines the actions taken by Monash University in relation to identifying and mitigating modern slavery risks within its operations, investments and supply chain. In this report, we refer to 'modern slavery' as defined by the *Modern Slavery Act 2018* (Cth).

We have identified numerous areas of concern, including specific cases of modern slavery and human rights violations, with the assistance of our partners. We continue to work with key partners and their global networks to identify, clarify, address, remediate and monitor areas of concern.



Images taken from Environmental, Social and Governance Report 2023 monash.edu/__data/assets/pdf_file/0007/3769135/MONU-425_ESG-Report_FA_240802.pdf



REPORTING ENTITY

Monash University is constituted under the *Monash University Act* 2009 (Vic), which is supplemented by a framework of regulatory instruments, namely the Monash University statute, and a suite of regulations, as well as a range of policies and procedures. Monash University is regulated by the *Higher Education Support Act* 2003 (Cth) and the *Tertiary Education Quality and Standards Agency Act* 2011 (Cth), under which the University has accreditation as an Australian higher education provider.

The principal governing body of the University is the Monash University Council, chaired by the Chancellor, Mr Simon McKeon AO (until 1 July 2024) and Dr Megan Clark AC (from 2 July 2024).

MEMBERS OF COUNCIL

The following persons were members of Monash University Council during 2024.

CHANCELLOR (EX-OFFICIO) (UNTIL 1 JULY 2024)

Mr Simon McKeon AO

BCom LLB FAICD

Committees of Council membership: ESG and Estates Committee, Executive Committee (Chair), Honorary Degrees Committee (Chair), Membership Committee (Chair), Resources and Finance Committee, Selection and Remuneration Committee (Chair)

CHANCELLOR (EX-OFFICIO) (FROM 2 JULY 2024)

Dr Megan Clark AC

BSc(Hons) PhD FATSE FAICD FAusIMM

Committees of Council membership: ESG and Estates Committee, Executive Committee (Chair), Honorary Degrees Committee (Chair), Membership Committee (Chair), Resources and Finance Committee, Selection and Remuneration Committee (Chair)

INTERIM PRESIDENT AND VICE-CHANCELLOR (EX-OFFICIO) (UNTIL 28 JANUARY 2024)

Professor Susan Elliott AM

MBBS MD FRACP

Committees of Council membership: ESG and Estates Committee, Executive Committee, Membership Committee, Honorary Degrees Committee, Resources and Finance Committee, Selection and Remuneration Committee

VICE-CHANCELLOR AND PRESIDENT (EX-OFFICIO) (FROM 29 JANUARY 2024)

Professor Sharon Pickering

BA MA PhD FASSA

Committees of Council membership: ESG and Estates Committee, Executive Committee, Membership Committee, Honorary Degrees Committee, Resources and Finance Committee, Selection and Remuneration Committee

PRESIDENT OF THE ACADEMIC BOARD (EX-OFFICIO)

Professor Carla Wilkin

BCom(Hons) PhD FCPA CA SFHEA MACS (Snr)

Committees of Council membership: Honorary Degrees Committee

APPOINTED COUNCILLORS

Mrs Pitsa Binnion PSM

BA Dip Ed MACE

Committees of Council membership: Audit and Risk Committee, ESG and Estates Committee

Professor Gill Callister PSM

BSW(Hons) BA

Committees of Council membership: Honorary Degrees Committee, Resources and Finance Committee

Dr Megan Clark AC (until 1 July 2024)

Deputy Chancellor

BSc(Hons) PhD FATSE FAICD FAusIMM

Committees of Council membership: Audit and Risk Committee, Membership Committee, Selection and Remuneration Committee

Ms Geraldine Johns-Putra

Deputy Chancellor (from 26 September 2024)

BEc LLB(Hons) LLM

Committees of Council membership: ESG and Estates Committee (Chair), Audit and Risk Committee, Selection and Remuneration Committee

Mr Peter Marriott

BEc(Hons) FCA MAICD

Committees of Council membership: Executive Committee, Resources and Finance Committee (Chair)

Dr Jane McAloon AM (from 1 September 2024)

LLB BEc (Hons) Grad Dip Corp Gov FAICD

Ms Jennifer Samms

BFc

Committees of Council membership: ESG and Estates Committee, Honorary Degrees Committee

Mr John Simpson AM

Deputy Chancellor

BA FCSG MAICD

Committees of Council membership: Audit and Risk Committee, Honorary
Degrees Committee, Membership Committee, Resources and Finance Committee,
Selection and Remuneration Committee

Dr Gillian Sparkes AM

B App Sc Grad Dip App Sc PhD MBA FAICD FIPAA

Committees of Council membership: Resources and Finance Committee

The Hon Peter Young AM KC

Deputy Chancellor

BJuris LLB

Committees of Council membership: Executive Committee, Audit and Risk Committee (Chair), Honorary Degrees Committee, Membership Committee, Selection and Remuneration Committee

STAFF-ELECTED COUNCIL MEMBERS

Associate Professor Tui McKeown (until 31 October 2024)

BA(Hons) MA PhD

Committees of Council membership: ESG and Estates Committee, Resources and Finance Committee

Professor Wayne Hodgson (from 1 November 2024)

BSc Grad Cert High Ed PhD

STUDENT-ELECTED COUNCIL MEMBERS

Ms Ishka de Silva (until 31 October 2024)

Committees of Council membership: ESG and Estates Committee, Audit and Risk Committee

Mr Demitrios Kaminis (from 1 November 2024)

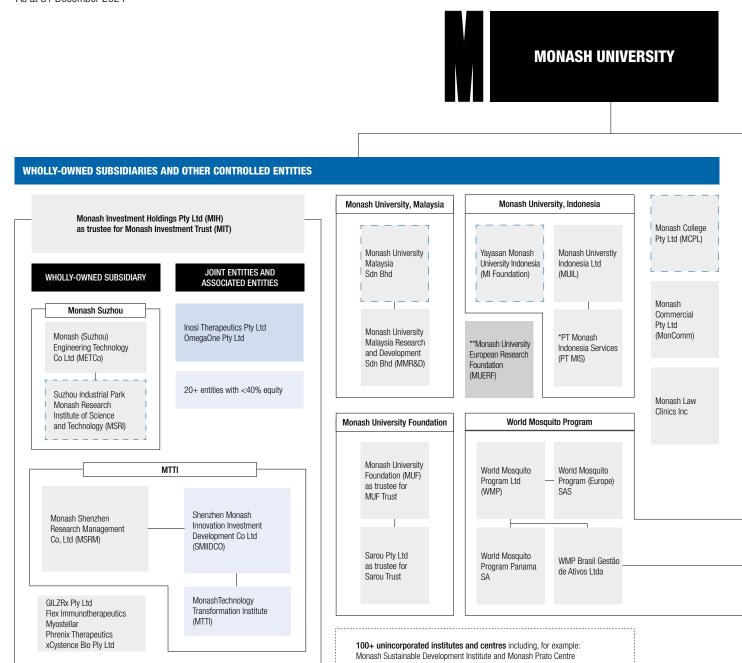
SECRETARY TO COUNCIL

Mr Richard Long (until 20 December 2024)

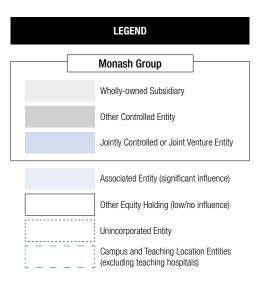
OVERALL GOVERNANCE AND MANAGEMENT

MONASH GROUP STRUCTURE

As at 31 December 2024



JOINT ENTITIES, ASSOCIATED ENTITIES AND OTHER EQUITY HOLDINGS AARNet Pty Ltd AVENU Learning LLC AMREP Animal Bendigo Primary Biocurate Pty Ltd **Fducation Australia** Services Pty Ltd Care Centre Ltd Open Universities Australia Pty Ltd VERNet Pty Ltd Monash Partners Hudson Institute of IITB-Monash Academic Medical Research Research Academy Health Sciences (Hudson) Centre Ltd DEREGISTERED ENTITIES IN PAST THREE YEARS Monash Health Monash Precinct Research Precinct Network Ltd • Ofidium Pty Ltd (2024) Pty Ltd (MHRP) (MPN) • Monash Accommodation Services Pty Ltd (2023) • Regenasome Pty Ltd (2022)



Wolbito do Brasil SA

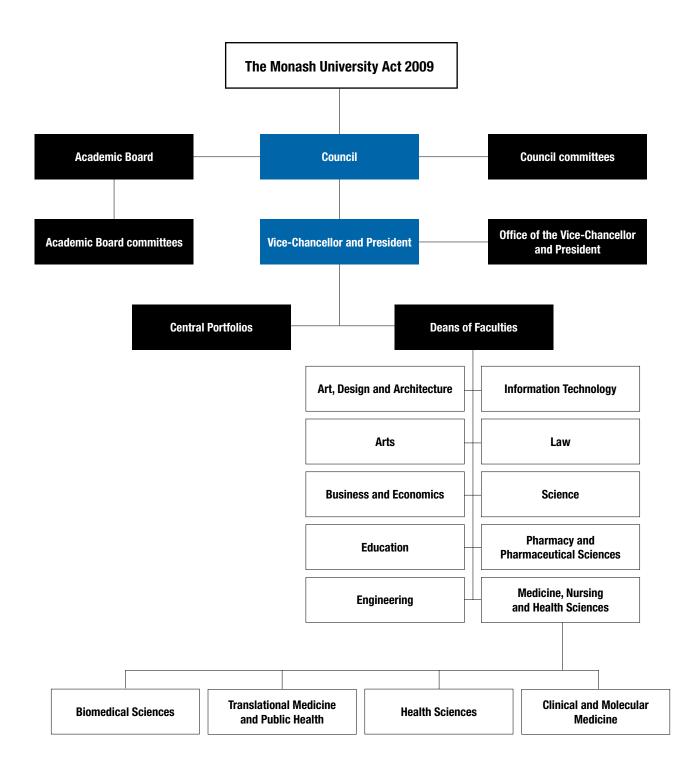
Notes:

- Controlled) Subsidiaries are those in which Monash is not the sole shareholder but has more than 50 per cent equity (i.e. control)
- > Jointly Controlled and Joint Venture Entities are those that have contractual arrangements that ensure control (or veto) in partnership with another shareholder
- Associated entities are typically between 20-50 per cent owned with the ability to exert significant influence over decisions, policies, etc.
- > Other equity holdings are typically below 20 per cent owned
- *PT MIS is listed as wholly-owned but has two shareholders, MU and MUIL (that is, the University has full control)
- > **MUERF is independent of the University. MUERF is governed by its Steering Council with Monash University being the sole member
- > DEREGISTERED ENTITIES IN 2024:
 - Ofidium Pty Ltd (10 July 2024) Jointly Controlled
 - Pio Therapeutics Pty Ltd (15.3 per cent stake sold in 2024) Associated Entity

REPORTING ENTITIES

Entities were identified with the assistance of the Risk and Compliance Unit and Executive Services. The entities were identified and assessed in relation to the degree of control, revenue and location.

All controlled entities are within scope of this report. However, a staged approach to onboarding has occurred due to the large number of entities. Each entity is assessed for risk in more detail during onboarding.



Monash University[^], ABN 12 377 614 012

ENTITY NAME	JURISDICTION OF REGISTRATION		
Campuses			
Monash University Malaysia Sdn Bhd^ Monash University Malaysia Research and Development Sdn Bhd	Malaysia		
Monash University Indonesia Foundation [^] (Yayasan Monash University Indonesia) PT Monash Indonesia Services*	Indonesia		
Other			
Monash College Pty Ltd^	Australia		
Monash Commercial Pty Ltd	Australia		
Monash Investment Holdings Pty Ltd Monash Investment Trust, Australia Monash Shenzhen Research Management Co Ltd, China Monash (Suzhou) Engineering Technology Co Ltd, China Ofidium Pty Ltd, Australia (deregistered 24 July 2024) Suzhou Industrial Park Monash Research Institute of Science and Technology, China Myostellar Pty Ltd Flex Immunotherapeutics Pty Ltd Phrenix Therapeutics Pty Ltd GILZRx Pty Ltd xCystence Bio Pty Ltd	Australia		
Monash University Indonesia Ltd [^]	Australia		
Monash University Foundation Pty Ltd [^]	Australia		
World Mosquito Program Ltd^ > World Mosquito Program Europe, France > WMP Brasil Gestão de Ativos Ltda, Brazil > World Mosquito Program Panama SA (registered 3 January 2025)	Australia France Brazil Panama		
Monash University European Research Foundation ETS**	Italy		

 $^{\ ^{\}wedge}$ on-boarded to the modern slavery program.

 $^{{}^\}star PT\ Monash\ Indonesia\ Services\ has\ two\ shareholders:\ Monash\ University\ and\ Monash\ University\ Indonesia\ Limited.$

^{**}Monash University European Research Foundation ETS is independent of the University under Italian law. It is governed by its Steering Council with Monash University being the sole member.



OUR RANKINGS

TOP 50 UNIVERSITY

#32 IN THE WORLD

Times Higher Education Impact Rankings 2024

#35 IN THE WORLD

US News and World Report 2024-25

#37 IN THE WORLD

QS World University Rankings 2025

#49 IN THE WORLD

QS Sustainability Rankings 2025

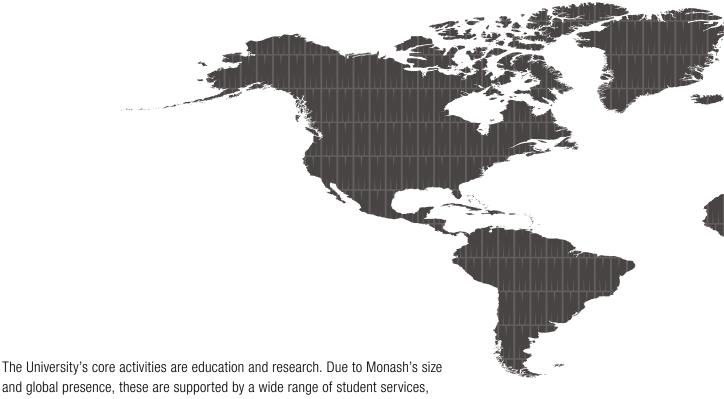
#58 IN THE WORLD

Times Higher Education (THE) World University Rankings 2025

482 IN THE WORLD

ShanghaiRanking's Academic Ranking of World Universities 2024

OUR GLOBAL FOOTPRINT



and global presence, these are supported by a wide range of student services, global campuses and research activities.

The Monash University Foundation, which generates investment income for the benefit of the University, is operated from within Monash through the portfolio of the Chief Financial Officer and Senior Vice-President.

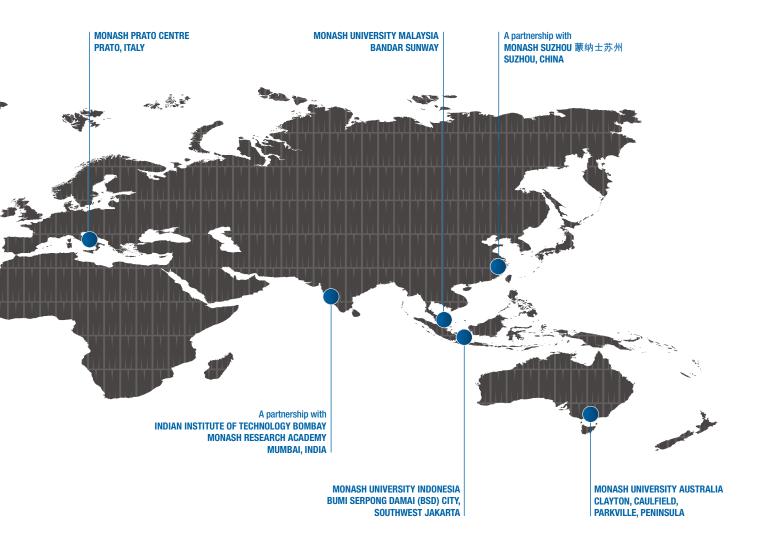
Monash College provides pathway education programs and services to international and domestic students as well as recruitment services for employers seeking talent.

Monash College is a wholly owned subsidiary of Monash University. It is the preferred pathway to Monash University for international students. Monash College offers foundation programs and English language courses and diplomas. For more than 30 years, Monash College has been helping international students get into their desired degree courses and preparing them for success in the workforce. Professor Allie Clemans is the Monash College Board Director.

Professor Sharon Pickering, Vice-Chancellor and President, is responsible for the management of Monash University (including Monash College), overseeing operations and the University's academic standards.

The Vice-Chancellor and President is supported by Senior Executives, who are responsible for the strategic direction of the University's activities across the portfolios. The Senior Executive portfolios are:

- · Vice-Chancellor and President
- Provost and Senior Vice-President
- · Chief Operating Officer and Senior Vice-President
- Chief Financial Officer and Senior Vice-President
- Deputy Vice-Chancellor (Research and Enterprise) and Senior Vice-President
- Deputy Vice-Chancellor (Education) and Senior Vice-President
- Deputy Vice-Chancellor (International) and Senior Vice-President
- Deputy Vice-Chancellor (Student Experience) and Senior Vice-President
- Deputy Vice-Chancellor (Indigenous) and Senior Vice-President



REPORT ON FINANCIAL OPERATIONS

UNDERLYING OPERATING PERFORMANCE

At an underlying operating result level, the Group incurred a \$48.7 million net result (2023: \$145.3 million deficit) from core operations.

Underlying operating performance

	Group	Group		Monash University	
	2023	2024	2023	2024	
	\$million	\$million	\$million	\$million	
Operating revenue	3281.6	3776.4	3022.0	3473.1	
Operating expenses	3248.3	3468.0	3031.0	3292.3	
Operating result	33.3	308.4	(9.0)	180.8	
Adjusted for:					
Philanthropic funds ¹	(31)	(33.9)	(30)	(33.5)	
Investment income	(147.6)	(255.8)	(84.5)	(153.3)	
Fair value gains ²	(147.6)	7.7	(84.5)	5.0	
Dividends/distributions reinvested ³		(182.8)		(85.6)	
Other investments ⁴		(50.7)		(72.8)	
Underlying result including non-recurring items	(145.3)	48.7	(123.5)	(6.0)	

NOTES:

- 1. Donations are classified as either research income or philanthropic funds. In 2024, the Group recognised \$48 million in donations as research income and \$34 million as philanthropic funds.
- 2. Fair value gains reflect changes in the market value of both property and financial instruments.
- 3. Reinvested dividends include a \$65 million distribution from a managed fund, which realised significant capital gains on its underlying assets following a client redemption.
- 4. Other investments include interest earned and trust contributions received.





active research projects across the globe

Approximately

A\$700 million



A LARGE and varied number of research areas including

significant representation in

MEDICINE, NURSING AND HEALTH SCIENCES (MNHS).

STUDENT HEADLINE FIGURE(S)

STUDENT PROFILE

Student enrolment in Australia (headcount) by attendance type and coordinating campus: 2020–2024 data

CAMPUS	STUDENT ATTENDANCE TYPE	2020	2021	2022	2023	2024
Caulfield	Full-time	16,757	15,042	13,550	13,856	16,825
	Part-time	2314	2317	2617	2327	2235
Sub-total		19,071	17,359	16,167	16,183	19,060
Clayton	Full-time	38,941	40,405	35,956	37,762	41,944
	Part-time	10,184	12,040	13,573	13,924	13,474
Sub-total		49,125	52,445	49,529	51,686	55,418
Gippsland	Full-time	398	394	402	395	424
	Part-time	4	2	1	1	
Sub-total		402	396	403	396	424
Parkville	Full-time	1496	1600	1692	1967	2199
	Part-time	595	539	556	538	545
Sub-total		2031	2139	2248	2505	2744
Peninsula	Full-time	3659	3519	3222	3242	3327
	Part-time	632	716	783	856	961
Sub-total		4291	4235	4005	4098	4288
Docklands	Full-time					927
	Part-time					28
Sub-total						955
Total		74,920	76,574	72,352	74,868	82,889

Notes:

> Data does not include students enrolled on overseas campuses or offshore partners

> The University transferred its Gippsland campus to become part of Federation University Australia on 1 January 2014. We ceased making offers to new students and have made arrangements with Federation University Australia regarding teaching its continuing students. One Monash offering – the Bachelor of Biomedicine Science course – continues to admit Monash students at Gippsland.

STAFF HEADLINE FIGURE(S)

MONASH UNIVERSITY, AUSTRALIA PEOPLE

Workforce disclosures (December 2023 - December 2024)

	ALL EMPLOYEES		ONGOING		FIXED TERM		CASUAL	
	NUMBER (HEADCOUNT)	FTE	FULL-TIME (HEADCOUNT)	PART-TIME (HEADCOUNT)	NUMBER (HEADCOUNT)	FTE	NUMBER (HEADCOUNT)	FTE
GENDER								
Women Executives	13	13	1	-	12	12	-	-
Women (total staff)	6110	5057	2441	621	2271	1880	777	311
Men Executives	12	12	1	-	11	11	-	-
Men (total staff)	4273	3674	1954	135	1716	1445	468	197
Self-described Executives	-	-	-	-	-	-	-	-
Self-described (total staff)	24	18	6	-	13	11	5	1
AGE								
15–24	503	285	48	8	99	83	348	149
25–34	2430	1953	700	77	1224	1023	429	177
35–44	3132	2732	1377	273	1293	1095	189	73
45–54	2469	2187	1310	218	793	675	148	60
55–64	1473	1290	798	132	449	370	94	33
Over 64	400	303	168	48	142	90	42	17
Total employees	10,407	8750	4401	756	4000	3336	1250	509

Notes:

- > Last Pay Period Date: 2023 15/12/2023 and 2024 13/12/2024
- > Dataset includes active paid staff members as at the last pay period date (Monash University Australian payroll staff only)
- > Staff on unpaid leave have been excluded from the dataset
- > Active casual/sessional staff members who did not work have been excluded from the dataset
- > Workforce figures are derived based on the Department of Jobs, Skills, Industry and Regions definition, which requires active staff numbers for the relevant pay period of the year
- > All roles covered by Monash enterprise agreements have been classified consistently with the Monash Enterprise Agreement (Academic and Professional Staff) 2024, and the Monash University Enterprise Agreement (Trades and Services Staff Building and Metal Trades Staff) 2009. The University has a suite of policies and procedures that govern recruitment, selection and employment at the University. These are consistent with employment standards and provide for transparent operational governance, fair treatment and a commitment to a culture of integrity and professionalism with equity, diversity and inclusion being key pillars of these policies and procedures.

MODERN SLAVERY GOVERNANCE STRUCTURE

Monash has a clearly defined governance structure supported by an expert advisory panel to oversee the development and implementation of the University's program of work to eliminate modern slavery.

The remit of this structure is to develop, review and refine the University's response to modern slavery within our operations and supply chains.

While the steering committee determines program direction, there is an escalation pathway that utilises the University's management structure in the event issues require escalation. As the modern slavery program of work is managed by Strategic Procurement, escalations are managed from Strategic Procurement to the Chief Financial Officer and Senior Vice-President, who is a member of the Vice-Chancellor's Group.

Monash University Co	uncil	Chair: Dr Megan Clark AC*				
ESG and Estates Com	mittee	Chair: Ms Geraldine Johns-Putra				
Vice-Chancellor's Gro	Vice-Chancellor's Group		Chair: Professor Sharon Pickering			
Modern Slavery Steer	ing Committee	Chair: Director, Strategic Procurement				
Strategic Procurement	Office of the General Counsel	Monash Abroad	Faculty of Arts	Faculty of Law		
Buildings and Property Division	Risk and Compliance Unit	Monash College	Monash Business School	Monash University, Indonesia		
Capital Financing	World Mosquito Program	eSolutions	Monash University, Malaysia			
Modern Slavery Work	ing Group	Chair: Procuremen	t Strategy and Governance I	Manager		
Strategic Procurement	Office of the General Counsel	Monash Abroad	Monash University, Malaysia	Monash College		
Buildings and Property Division	eSolutions	Monash Retail	Risk and Compliance Unit	World Mosquito Program		
Monash University, Indonesia	Group Policy					

^{*}From 2 July 2024.

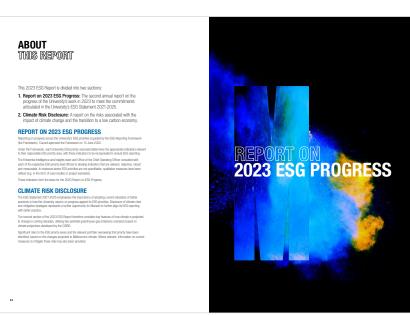
ENVIRONMENTAL, SOCIAL AND GOVERNANCE

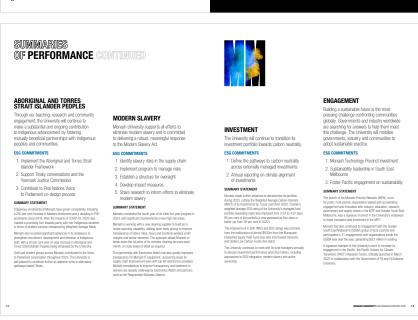
The Monash **Environmental, Social and Governance Statement 2021–2025** sets out the University's priorities to foster sustainable and responsible practice across its teaching and research, its investments and operations, as well as how it engages with partners and the communities it serves. Monash has reported annually on progress against these priorities since 2023.

Reducing the occurrence of modern slavery is one of nine core themes articulated in the ESG Statement, and reporting on the University's progress to address modern slavery is integrated into the University's annual ESG reporting framework. This includes regular updates to the ESG and Estates Committee, a Standing Committee of University Council, which assists Council in its responsibilities to oversee the implementation of the University's commitment to the United Nations' Sustainable Development Goals and ensure Monash is meeting environmental, social and governance obligations relating to sustainability.

CONTRIBUTING TO THE HIGHER EDUCATION SECTOR

Monash University is an active member of the Australasian Universities Procurement Network (AUPN) which represents the Australasian and New Zealand higher education sector. Through the AUPN, we help to develop a sector-wide approach to excellence in procurement, including a specific AUPN program of work for modern slavery. This program of work continues to reduce risk across the sector.





Images taken from Environmental, Social and Governance Report 2023 monash.edu/__data/assets/pdf_file/0007/3769135/MONU-425_ESG-Report_FA_240802.pdf

SUPPLY CHAIN

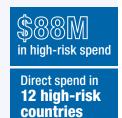
THIRD PARTY SPEND IN 2024

Total third party spend: \$1.238 billion





of spend with 336 suppliers



New supplier onboarding:

1375
Fully onboarded new suppliers created in 2024

New one-time vendors

3085
Total number of new suppliers created in 2024

Monash University investments in 2024:

MONASH UNIVERSITY'S CONSOLIDATED INVESTMENTS TOTAL (including Monash University Foundation).

The largest areas of investment were:

TERM DEPOSITS

AUSTRALIAN AND INTERNATIONAL EQUITIES

CORE FIXED INTEREST

ALTERNATIVE DEBT

INVESTMENT PROPERTIES.



Annual and specific risks are identified and remediated using an integrated approach. Modern slavery-related risks that are identified because of the modern slavery program are generally managed within the program of work and reported in our annual report. When required, escalation through the management structure will be undertaken. The program contains both recurring annual tasks and specific tasks for each year, and new tasks are added to the works program on a prioritised basis. That includes the ability to add new tasks to the program in real time if required. In addition, modern slavery risks may be identified from other avenues that are external to the modern slavery program. These may occur through our third-party partnerships and affiliations, or policies, procedures, processes, instructions or grievance mechanisms.

AVENUES FOR DISCLOSURES

EXTERNAL PATHWAYS AND FOR URGENT ASSISTANCE:

If urgent help is required including immediate threats to life or wellbeing:

Phone Triple Zero (000) and ask for Police. Translators are available.

For assistance with less urgent concerns, an investigator will be assigned to help via the following avenues:

Phone Australian Federal Police on 131 237 (131 AFP), contact via the AFP website or make a report online.

Anonymously via Crime Stoppers. Phone **1800 333 000** or visit the **Crime Stoppers Australia website**.

For modern slavery-related support services for yourself or others:

The Attorney General's Modern Slavery Support Services webpage.

INTERNAL PATHWAYS FOR DISCLOSURES, GRIEVANCES AND WHISTLEBLOWING

For internal disclosure pathways, where possible, the University leverages existing policies and procedures to manage disclosures related to modern slavery. Where applicable, these pathways may generally also be utilised to determine and manage any required remediation.

General program feedback or concerns:

Within our Modern Slavery Act Report, we provide an email address which is monitored and may be used to disclose concerns, ask questions, or provide feedback on the report: sustainable.procurement@monash.edu

Whistleblowing

A robust, publicly accessible whistleblowing policy and set of procedures are in place to manage both protected whistleblowing and non-protected events with senior executive oversight, mandatory requirements and timeframes.

Whistleblower disclosures may be made via:

- Email: whistleblower@monash.edu
- Publicly available online disclosure form

The Whistleblower website also highlights available external avenues:

- Under Commonwealth legislation, disclosing directly to an eligible recipient of the University or a related body corporate, or certain external agencies, such as the Australian Securities & Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA) and, in the case of a disclosure regarding tax affairs, the Australian Taxation Office (ATO).
- Under Victorian legislation, a whistleblower disclosure (called a 'public interest disclosure') can only be made to the Independent Broad-based Anti-Corruption Commission (IBAC) and, in relation to administrative actions of the University, the Victorian Ombudsman (VO). For information on how to make a disclosure to IBAC and the Ombudsman, contact IBAC or the VO.
- As well as prescribing who can receive a whistleblower disclosure, Commonwealth and Victorian legislation prescribes certain rules for who can make a whistleblower disclosure, who and what the disclosure can be about, and the protections afforded to whistleblowers.

Internal accountability

The University has appointed a Whistleblower Coordinator to be responsible for:

- Receiving and handling whistleblower disclosures on behalf the University.
- Dealing with queries about whistleblower disclosures in relation to the University.
- · Ensuring the University carries out its responsibilities under Commonwealth and Victorian legislation and IBAC Guidelines.
- · Liaising with IBAC and the VO.
- Ensuring whistleblower disclosures made to the University are appropriately investigated.

The Monash Whistleblower Coordinator is the Chief Operating Officer and Senior Vice-President of Monash University.

Other avenues

There are other avenues which may identify modern slavery risks. Where applicable, matters identified through these avenues may be treated as whistleblower events and, if appropriate, transitioned to the whistleblower process while maintaining end-to-end whistleblower protections.

OTHER SUPPORTING POLICIES, PROCEDURES, PROCESS AND INSTRUCTIONS TO IDENTIFY AND CONTROL RISKS

The following policies, processes and instructions may be avenues by which we either hear of concerns or manage and reduce risks.

POLICIES

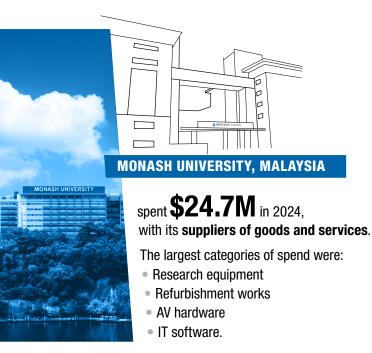
Policy	Role
Procurement Policy	Mandatory modern slavery, responsible procurement components
Group Risk Management and Compliance Policy	Setting risk and compliance appetites including non-negotiables
Staff Code of Conduct	Acceptable and unacceptable behaviours and avenues to address concerns
Student Code of Conduct	Acceptable and unacceptable behaviours and avenues to address concerns
Equity, Inclusion and Anti-discrimination Policy	Preventing discrimination
Health Safety and Wellbeing Policy	Placing health, safety and wellbeing as a key requirement
Mental Health Policy	Recognising mental health issues- and that not all harm is physical - and help is available
Sexual Harm Prevention and Response Policy	Setting clear boundaries and responses to concerns

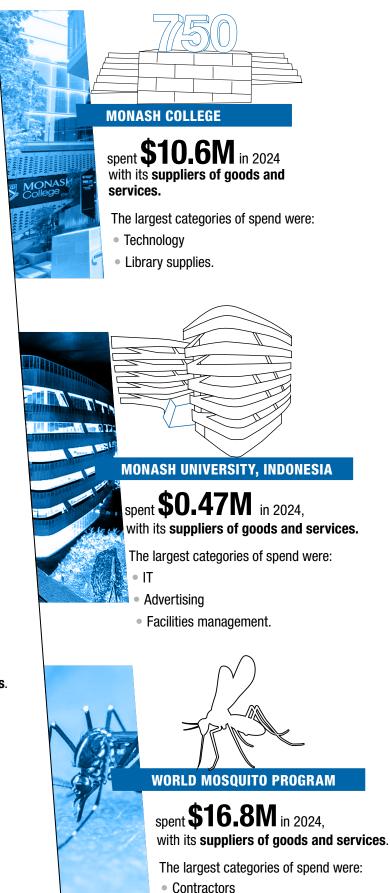
Business processes and instructions	Role	
Contract templates	Includes three different modern slavery model clauses	
Tender templates	Modern slavery questions and requirements including related scoring. Internal approve required at tender planning and outcome stages	
Supplier onboarding process	Includes a modern slavery gate for onboarding	
Standardised modern slavery clauses	Including low-risk, high-risk, and high-risk electronics clauses	
Modern slavery online training	For all new staff, and mandatory for senior executives, lawyers and those working in procurement or with key purchasing roles	
Modern slavery training	Live training including explaining clauses, their applications scenarios, and negotiation methods	

A full list of policies is available at the Monash University Policy Bank.

SUPPLY CHAIN







TravelIT.

UNDERSTANDING THE RISKS BY ANALYSING OUR 2024 THIRD-PARTY SPEND IN DETAIL

GAINING DEEPER INSIGHTS INTO OUR SUPPLY CHAIN VIA AFFILIATIONS

In 2024, we have increased transparency of 32 factories and mines within our supply chain through assessment procedures. Some sites may undertake work in more than one supply chain tier. These factories and mines are known to be in the supply chain of the University for specific products the University purchases.

Assessment methods used by our third-party partners include questionnaires, in-person and video/audio interviews, audits, official government and workplace documents, and less formal methods such as news articles and internet forums frequented by staff. Our partners

play a critical role in this area. Direct assessment methods by the University include tender questions, specific questionnaires and face-to-face discussions.

INSIGHTS THROUGH SPEND ANALYTICS

Each year we analyse our third-party spend in detail to assess our risks and risk reduction coverage.

The modern slavery program risk-assesses all third party spend and utilises well regarded sources, such as the **International Labour Organisation (ILO)** and the **Walk Free Foundation**, to identify country, industry and import risks.



HOW WE IDENTIFY AND TARGET OUR SPEND AND THE MODERN SLAVERY RISKS THAT COME WITH IT

DIRECT SPEND IN HIGH-RISK CATEGORIES

Category	Supplier Count
Catering	382
Desktop Accessories	170
Cleaning	68
Desktop Hardware	54
Networks	41
Staff Supplies	19
Security & Parking	18
Telecommunications	15
Furniture, Fittings & Equipment	9
Printing	7
Mobile Devices & Accessories	4
	787

SUPPLY CHAIN VISIBILITY

The University seeks to improve its supply chain transparency through both internal and third-party work as part of its modern slavery program. Visibility changes each year, according to what we purchase.

These issues were identified in the third-party reports that Monash receives from its affiliation with global not for profit entities focussed on reducing and addressing modern slavery. Reports are based on a mix of first-hand audits, interviews, public documents such as court records, remote audio/video interviews, and less formal techniques such as monitoring internet forums that staff are known to utilise.

Assessments may include classifying issues either as risks or violations. Violations are generally determined based on a violation of the human rights laws of the country which applies to the relevant location of a particular factory and where there is sufficient evidence to support a violation as having occurred. Risks are identified when there is sufficient evidence to prove the likelihood that a potential violation of human rights laws exists, but there is insufficient evidence to prove that a violation has occurred. This classification methodology has been adopted from Electronics Watch, a not for profit that the University work with to identify and reduce risk in its electronics supply chain.

Below is a table of one of the University's high-risk supply chains reflecting our visibility of various supply chain tiers during 2024.

This transparency was the result of our partners and their work at sites that are part of the University's supply chain.

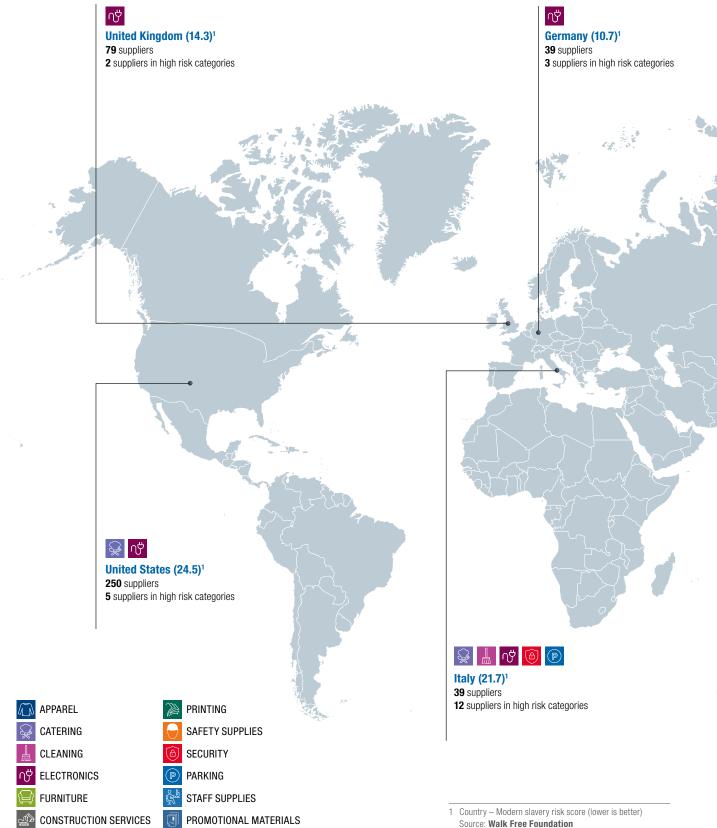
Details are purposefully kept at a high level to protect ongoing risk-reduction, mitigation and monitoring work being undertaken by our partners. For this reason, the University has not disclosed further details of the supply chain in question.

Tier	Supply Chain Entity	Number of entities visible to the University
1	Supplier to the university	6
2	Assemblers / components	7
3	Component Manufacturers	27
4	Refiners	0
5	Miners	2

The number of tiers varies by product. Our breadth and depth of visibility varies by product and site.



COUNTRY AND SUPPLIER INSIGHTS²



Source: Walk Free Foundation

CHEMICALS

ANIMAL SUPPLIES

² Suppliers, listed at category level 3, may supply to more than one category or operate in more than one country.

Cameroon (70.5) Norway (1)

Czech Republic (12.5)

Ukraine (47.7)

Georgia (37.9)

Belgium (10.8)

Israel (35.4)

Finland (5.4)

Sri Lanka (55.7)

United Arab Emirates (39.5)

Japan (11.4) South Africa (52.2) Ghana (45.1) France (13.3) Laos (51.5) Bulgaria (25.9) Cambodia (57.6) Hungary (18.9) Serbia (34.4) Philippines (66.4) Poland (19) Pakistan (80.3) Switzerland (13.6) Spain (10.4) Estonia (15.3) Denmark (5.7) Sweden (7.4) Myanmar (66.4) Iran (68.5) Ireland (9.3) Nigeria (75.8) Korea, Republic Of (28.6) Romania (25.9) Q Ø ∩Ÿ 🗊 🔒 China (45.5)1 39 suppliers 18 suppliers in high risk categories Vietnam (43.9)1 20 suppliers 0 suppliers in high risk categories Ş | ₼ | - | Malaysia (37.2)1 Indonesia (48.6)1 70 suppliers 6 suppliers in high risk categories 31 suppliers 15 suppliers in high risk categories *i* ₩ NŸ New Zealand (7.8)¹ India (56)1 Singapore (24.4)¹ 64 suppliers 19 suppliers 23 suppliers Australia (6.8)1 3 suppliers in high risk categories 2 suppliers in high risk categories 2 suppliers in high risk categories 3109 suppliers 795 suppliers in high risk categories

OTHER COUNTRIES Fiji (not available)

Netherlands (6)

Thailand (46.5)

Taiwan (21.3)

Bangladesh (58.1)



MANAGING SUPPLIERS

To support our global research and education operations, Monash engages with a wide variety of suppliers. These vary from common goods and services to some of the most specialised suppliers worldwide that support Monash's leading research projects.

Our supply chain is highly varied and includes labour and products. Each of these may have a long supply chain. Some of our suppliers may outsource labour, and this outsourcing may have multiple levels.

For products, a typically long supply chain traces from mines to refining, manufacturing, and may include assembly. For textiles, the supply chain traces from seed or raw chemicals through processing and manufacturing.

As part of our targeted approach, the University may stipulate terms that eliminate higher-risk supply chain structures. One example is cleaning services, known to be of very high-risk outsourcing via subcontracting. In that instance, the University prohibited cleaning services outsourcing by our primary provider, except for specific aspects of the service that may be reasonably outsourced to a specialist provider, such as pest control services.

A multifaceted approach is taken to understand the risk within our supply chain, as the supply chain is an integrated component that supports the University's ability to operate:

- **1. Analysis** of detailed purchase order and credit card data for the reporting year to understand our spend.
- Assessment to identify known high-risk products, services, industries and countries.
- Processes, procedures, contract and tender templates are regularly reviewed and updated.
- 4. Behavioural and human practices are considered. Behavioural practices may be influenced by changes in the market, budgets and internal rules or events. Our approach includes observed and likely practices, both of which are viewed in light of influencing factors: internal (University) and external (e.g. supply chain, industry and competitors).

PROCUREMENT

Staff involved in the procurement of goods and services remain at the front line of our efforts to reduce the risk of modern slavery in our supply chain.

TRAINING AND AWARENESS

- Staff new to procurement or purchasing roles are identified and scheduled for modern slavery training. This applies to Monash University Australia, Monash College, Monash University Malaysia, Monash University Indonesia and World Mosquito Program.
- The University's Modern Slavery website, operated by the Strategic Procurement function, is updated and maintained.
- All staff new to the University are enrolled in modern slavery training.

PROCUREMENT PROCESS

- In 2024, 1375 new suppliers were onboarded through the gating process to confirm their compliance with modern slavery obligations. prior to becoming a supplier to the University.
- We continue to benefit from our work with Electronics Watch, with a marked improvement in transparency for our IT Electronics supply chain. The University continues to pre-check material new IT purchases with Electronics Watch to support our decision-making during tenders, where possible.

CLEANING SERVICES WITHIN AUSTRALIA

The University has now completed one year of the new cleaning services contract following a comprehensive tender designed to improve transparency and reduce modern slavery risks. This includes prohibiting sub-contracting unless in specific circumstances, increased cleaning service transparency (with clarity down to area type and size), labour types, award pay rates and applying maximum reasonable productivity levels to cleaning services. There has been a marked improvement in service and pricing transparency. Operationally, both the University and its primary cleaning supplier benefit from a detailed cleaning services model that both parties can adjust frequently, resulting in ongoing transparency and a shared understanding of the services and pricing impacts. The complex multi-site cleaning services data model, built to increase transparency and reduce modern slavery risks for tender services and pricing, has continued to be used and has increased ongoing business efficiency at the daily operational level for both the University and its primary cleaning supplier.

CASE STUDY UPDATE: APPAREL

In 2024, the University assessed an array of apparel suppliers via a questionnaire and discussions to gain an understanding of their knowledge and any existing approach to modern slavery; this included reviewing a range of supporting documents. Where deficiencies were observed in a supplier's approach, the University created a specific supplier improvement plan. Upon agreeing to its improvement plan in writing, a supplier was considered qualified to be on the University's first apparel panel. Improvement plans included specific requirements and completion timeframes; a supplier meeting those delivery requirements continues to be on the panel. In 2025, monitoring of suppliers and the delivery of their committed improvement plans will commence.

In the event of ongoing non-compliance, the University will take that into consideration when making apparel purchasing decisions. The University recognises their existing engagements with suppliers, including where there may be agreed contract terms in place. Rather than request or require any suppliers operating under existing terms to vary their agreements, the University has decided to simply include the status of each supplier's voluntary improvement plans in its purchasing decisions, i.e. ongoing non-compliance or non-delivery will result in a cessation of orders to that supplier rather than the more traditional concept of using an agreement and a contractual breach via contract terms. Thus, the panel and improvement plan were implemented without the need for changes to any contractual terms by effectively exposing suppliers to direct market forces – the University's demand for apparel that meets certain requirements. In addition to close monitoring of apparel suppliers, the University will trial a progressive roll-out of a Supplier Code of Conduct.

The panel shall be re-assessed in two years' time. This approach was well received by all the apparel suppliers, who varied from having very basic knowledge of modern slavery to a best-in-class transparent apparel supply chain with a strong, long-term modern slavery focus.

With the panel now formed and supplier improvement plans in place, a communication and engagement campaign will occur for staff and students in 2025 as well as monitoring and responding to panel bypass – events where someone has purchased apparel from nonpanel suppliers.

Supplier improvement plans vary from simple to those containing several tasks with varying delivery dates throughout 2025. Regular progress reviews of supplier improvement plans will occur to ensure suppliers meet their committed delivery timeframes for each task, and that they have support from the University where needed. Where appropriate, the reviews may include timeframes and tasks, assessing their deliveries, and reviewing website updates, training outcomes or policies.

In subsequent years, the panel will undergo a reassessment, which will include a review against the original criteria to identify progress and further opportunities. We anticipate updating the assessment criteria regularly to further raise our collective standards and reflect our growing maturity and capabilities. We must consider how to assess whether this approach has had an impact on supplier practices or their supply chain.



CASE STUDY: IT HARDWARE

Working with our partners

For material IT hardware purchases that are early in the IT device workflow, eSolutions sends a list of model numbers to Electronics Watch, of which the University is an affiliate. Electronics Watch only represents public buyers, including 1500 universities and government entities globally. Electronics Watch will respond whether they have information on the supply chain related to each model of device. This may include detail of the assembly factory or other supply chain, any existing issues, concerns, lack of engagement, or where mitigation and other improvements may also be underway, as this has been worked on for some time prior to the University's involvement.

Enabling informed buying decisions

This factory information helps the University make informed buying decisions. The University prioritises to focus on victims of modern slavery and will not terminate a business transaction without consideration.

In certain cases this may include the exclusion of a supplier for a certain product they put forward. For example, an ongoing failure to engage or address known issues in a final assembly factory where reasonable attempts to resolve have not succeeded. This is an example of a known Tier 2 supplier – the factory that performed final assembly of the model proposed to be sold to the University – meaning the Tier 1 supplier will not get the business as a result. The Tier 1 supplier will typically be informed with clear feedback that they have an area in their supply chain to improve.

A combined approach

Electronics Watch increases transparency and builds relationships more deeply into supply chains by building relationships with factories around the globe directly or via their monitoring partners. Working with factories can include the use of face-to-face meetings with workers and management, audits, questionnaires, interviews and publicly available data. If areas of concern are identified - including a refusal to engage - actions and responses are established, which can include monitoring, discussions, agreements and remediation. Electronics Watch may draw on the support of its affiliates in communicating with technology brands that use concerning practices to demonstrate a clear connection between their customer and a factory of concern. The technology brand is aware that Monash has increased transparency in its supply chain and that ongoing unresolved issues may cost them new business. We receive regular reports with updates and progress for each site, including remediation and monitoring stages. In many cases, the work to resolve identified issues occurs over more than one year.

We continue a strong focus on our IT hardware supply chain through our work with Electronics Watch.

RISKS - CAUSE, CONTRIBUTE OR DIRECTLY LINKED³

Risks have been identified including whether they cause, contribute, or are directly linked to, modern slavery risk and events. This has enabled us to better understand our impact and ways to minimise and address it.

Contribute – Our business contributes to an adverse impact

OPERATIONS

AREA	RISK	ACTIONS
Procurement and management EDUCATION RESEARCH CAMPUSES ALL ENTITIES	Set unreasonable price expectations and/or timeframes on tenders or orders. Alternate suppliers may be utilised, or pressure passed down the supply chain leading to poor practices.	 Mandatory modern slavery training module for all new staff, and a 100 per cent completion key performance indicator (KPI) annually for all staff involved with purchasing, legal or commercial matters, in addition to all senior staff. Raise awareness that time and price demands both may increase risks, if unreasonable.
Procurement – general EDUCATION RESEARCH CAMPUSES ALL ENTITIES	Purchase from industries known to be high risk without due consideration. That includes identifying the nature of the risk, how the university may minimise or eliminate it, including via commercial and procurement methods. When demands are made on a market that include unreasonable timeframes and/or cost and if market responses are acted upon, signals are sent to the market that modern slavery is not of primary concern. This may include items purchased for education and research activities both onshore and offshore.	 Mandatory training – 100 per cent KPI (reached). Annual refresh of modern slavery high risk countries, industries and products/services. Supplier onboarding modern slavery gate with manual management if the supplier does not pass the gate – KPI measured. Formation of the Apparel Panel of pre-approved apparel suppliers. Procurement analytics down to line-item level on orders to capture all spend in detail for risk-based reporting. Identifying and targeting high-risk purchases including specific risk reduction actions via our modern slavery program. Tender templates have a Responsible Procurement section – must be completed and approved at both the planning and outcome stage. Standardised approach to modern slavery clauses. Bespoke management of known high-risk large projects/contracts.
Management and specifications EDUCATION RESEARCH CAMPUSES ALL ENTITIES	Place undue pressure on suppliers to perform at levels not reasonably achievable, or in a way that puts at risk reasonable business profit. The supplier receives a signal that performance and cost are the only, or most, important factors in retaining or growing the business. The supplier may react by trying substandard practices to keep their business afloat.	 Increased transparency in commercial dealings, such as a completely transparent shared model for managing high risk cleaning services. Security and plumbing services have also been addressed in a similar manner. Specific mention of this topic within modern slavery training, which is mandatory for procurement staff and senior executives.
Staff employment EDUCATION RESEARCH CAMPUSES ALL ENTITIES	Staff are subject to work pressures and there is the potential for a power imbalance to exist with managements, which can lead to outcomes detrimental to the staff member.	 The University has a comprehensive set of policies and processes that cover treatment of staff and behaviours of all those on campus. There are a multitude of accessible complaint avenues, including anonymous ones, and those protected by whistleblower laws. Staff are engaged by robust workplace agreements. Training in identifying and preventing bullying and harassment, diversity and inclusion, and many other related topics is mandatory for all staff.

³ UN Guiding Principles on Business and Human Rights Accessed 8 February 2025

Contribute - Our business contributes to an adverse impact

SUPPLY CHAIN

AREA	RISK	ACTIONS
Recruitment EDUCATION SOME ENTITIES	The University uses recruiters to identify potential students from around the world.	 Use of known, quality recruiters Knowledge sharing across Australian universities or observed recruitment practices. Contract term improvements. Monitoring and assessment of recruiters. Ongoing development and deployment of student services programs.
Investments \$	Appointing investment managers with insufficient modern slavery knowledge to meet the University's requirements.	 Formal annual reporting by investment managers on their work in modern slavery. Limit investment types to avoid investments not aligned with the University. Seek reasonable returns.
SUPPLY CHAIN Subcontracting EDUCATION RESEARCH CAMPUSES ALL ENTITIES	Put in place or otherwise enable uncontrolled or non-visible subcontracting, including multi-level subcontracting. The lack of visibility increases the potential for modern slavery practices. Subcontracting includes multiple profit-takers and may put pressure on those producing the goods or performing the service.	 As standard practice, subcontracting is generally limited to a case-by-case basis. Tender documents seek information about intended subcontracting, and responses are reviewed. Standard practice in contract review and negotiation requires subcontractors to comply with Monash policies and requirements against modern slavery and flow down such obligations to any party they further subcontract with.



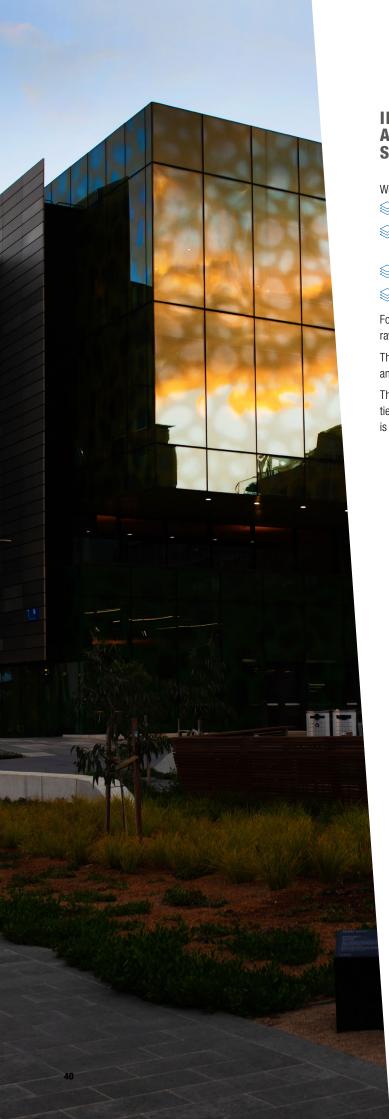
Directly linked – Our impact is directly linked to our operations, products or services by our business relationship with another entity.

SUPPLY CHAIN

AREA	RISK	ACTIONS
Procurement – electronics EDUCATION RESEARCH CAMPUSES ALL ENTITIES	The electronics supply chain is long and often opaque. It reaches all the way back to mining, often with known areas of concern such as cobalt mining by children. Many tiers of the supply chain are known to be high risk globally as raw materials are refined, components are manufactured, assembled into parts, and parts assembled into devices. This may occur even when best-in-class electronics are purchased.	 Ongoing work with Electronics Watch to pre-assess and monitor material electronics purchases. This also applies to Standard Operating Environment (SOE) models which are widely used. A supplier with known modern slavery issues in their supply chain may be excluded from a tender, and their ongoing lack of addressing the issues highlighted as the cause of their exclusion. This sends a clear message back to the supplier and the wider market that they must work on resolving known modern slavery issues in their supply chain in a reasonable manner or their business will be affected. Specification change – where an industry or product is known to be very high risk and hard to mitigate, we may alter the early specification so the high-risk product or industry is not part of the design solution. Price increases sought by suppliers should be carefully reviewed to ensure price movements reasonably reflect changes in the market and wider economic conditions.
Procurement – construction CAMPUSES	Both materials and labour are of concern. Materials may have opaque offshore supply chains and come from high-risk countries. Labour may have a degree of subcontracting as standard business practice.	 The University utilises quality construction partners, and identifies areas of concerns before setting terms to reduce the risks via tenders and contracts. This includes reviewing suppliers' documentation on their internal processes and procedures to ensure they are adequate.
Procurement – solar CAMPUSES	Solar panels are at high risk globally. While the University has completed most of its planned material solar deployment, it is foreseeable that solar panels may be required in the future.	 Consider specification changes early in the project to utilise an alternate technology. In the event of material solar purchases, consider a market assessment to identify new suppliers that have more transparent and safer solar supply chains. Also provide feedback to solar panel sources of concern.
Procurement – apparel ALL ENTITIES	Apparel is a high-risk industry, and the University has decentralised apparel purchasing. An assessment has highlighted a variety of apparel purchasing approaches from mature to buying based on price. This may cause, contribute to or indirectly impact the risk.	 Identification of all apparel purchases and who buys them. Assessment of several apparel suppliers and formation of supplier improvement plans for each. Completion of the first apparel panel with approved suppliers.
Recruiting CAMPUSES	The global recruiting industry for students is known to be reasonably high risk. This may include coercion and the use of guilt-driven debt bondage associated with "gifts" such as electronic devices given to prospective students – the student feels pressured to proceed.	 Careful assessment of all recruiters and their practices. Use of agreements with suitable terms and conditions preventing such practices and enforcement of the terms of the agreement against recruiters to rectify any breaches. Shared information across the higher education sector to identify credible recruiters. Proceed with additional caution if the global student market undergoes material change.
Events EDUCATION RESEARCH CAMPUSES ALL ENTITIES	The University operates many events each year. These may include the requirement for a strict readiness timeframe and the use of labour hire to set up and run events. This may create pressure on our suppliers or their staff even with careful forward planning. For example, there may be a need to minimise disruption to campus operation — which may reduce available setup time.	 Careful planning and using proven methods, suppliers and timeframes. Robust contracts including labour obligations. The use of known and quality suppliers. The establishment of long-term and closer business relationships to minimise short-term thinking by suppliers.

KEY HIGH RISK CATEGORIES AND RISK REDUCTION

High-risk category	% of high-risk spend	Risk reduction in place
Cleaning	26.7%	New cleaning agreement with full and ongoing transparency of labour, productivity, and costs.
Networks	23.6%	Electronics Watch affiliation and pre-purchase assessments, high-risk electronics clauses
Security	17.8%	New security agreement with increased transparency of labour
On-campus catering	16.3%	Largely centralised on-campus catering. Agreements adhere to labour laws.
Desktop hardware	12.3%	Electronics Watch affiliation and pre-purchase assessments, high-risk electronics clauses
Desktop accessories	1.3%	Electronics Watch affiliation and pre-purchase assessments, high-risk electronics clauses
Telecommunications equipment	0.5%	Electronics Watch affiliation and pre-purchase assessments, high-risk electronics clauses



INVESTIGATIONS, ASSESSMENTS AND ACTION TAKEN TO IDENTIFY AND ADDRESS SUPPLY CHAIN VIOLATIONS AND RISKS

We utilise 'tiers' when referring to various levels of our supply chain.

Fier 1 suppliers are those we directly purchase from.

Tier 2 suppliers are the suppliers our tier one suppliers purchase from.

∀ Tier 3 are their suppliers.

∀ Tier 4+ are the suppliers of their suppliers.

For products, the tiers typically go all the way back to where the key raw materials originally came from.

The number of tiers may vary depending on what is being produced and the various production stages.

The deeper into our supply chain we try to see - i.e. the higher the tier number - typically the more difficult it is to gain visibility of what is occurring.

The better our visibility of various tiers, the more transparent our supply chain is. Improved supply chain transparency enables better risk identification and management, and the improved focus of our efforts.

The University sends electronic device model numbers to its third party partner and then receives reports on known elements of the relevant supply chain. The following are related to the University's electronic supply chains with detailed information included on subsequent pages.

SUPPLY CHAIN VIOLATIONS AND RISKS BY SUPPLY CHAIN TIER

No risks or violations were identified in our tier one suppliers in this category.

Supplier Tier	Violations (number identified)	Risks (number identified)	Number of sites
2	24 Violations	15 Risks	7
	 Occupational Health & Safety (OH&S) (5) 	• OH&S (3)	
	 Recruitment and employment conditions (4) 	Wages and benefits (2)	
	Excessive working hours (3)	Violence and harassment (2)	
	 Discrimination in hiring and occupation (3) 	Security (1)	
	Forced labour (3)	 Suicide prevention measures needed (1) 	
	Wages and benefits (3)	 Harassment of young females (1) 	
	 Freedom of employment, association and right to collective bargaining (1) 	 Freedom of employment, association and right to collective bargaining (1) 	
	 Abusive termination of employment (1) 	Excessive working hours (1)	
	 Violence and harassment (1) 	Forced labour (1)	
		 Recruitment and employment conditions (1) 	
		Environmental issues (1)	
3	56 Violations	53 Risks	27
	 Excessive working hours (11) 	 OH&S (10) 	
	 Recruitment and employment conditions (9) 	Wages and benefits (9)	
	• OH&S (9)	 Recruitment and employment conditions (7) 	
	 Violence and harassment (7) 	 Freedom of employment, association and right to 	
	Forced labour (6)	collective bargaining (6)	
	Wages and benefits (6)	Excessive working hours (6)	
	 Freedom of employment, association and right to 	 Discrimination in hiring and occupation (6) 	
	collective bargaining (4)	 Violence and harassment (3) 	
	 Abusive termination of employment (3) 	Environmental issues (2)	
	 Discrimination in hiring and occupation (1) 	 Abusive termination of employment (2) 	
		Forced labour (2)	
4+	4 Violations	9 Risks	2
	Excessive working hours (2)	 Exploitation of child labour and young workers (2) 	
	 Wages and benefits (1) 	Forced labour (2)	
	• OH&S (1)	 Discrimination in hiring and occupation (2) 	
		• OH&S (1)	
		 Recruitment and employment conditions (1) 	
		 Violence and harassment (1) 	

SUPPLY CHAIN VIOLATIONS AND RISKS BY COUNTRY

In addition to the University's work in assessing its own supply chain, it recognises that its anti-modern slavery practices are part of a global effort to eliminate modern slavery. The following section addresses the global network of third parties, which the University is part of, that has undertaken work to identify and assess those locations that represent the greatest risk of the occurrence of modern slavery in global supply chains. The University is affiliated with these third parties in a combined effort to reduce modern slavery.

To maintain confidentiality, identifying details such as industry and exact location are removed from the following pages as work may still be underway to address and remediate these issues. At the end of each section is the status of ongoing work at those locations, which may include remediation.

Via these affiliations the University is able to:

- Increase transparency of supply chains for specific products the University purchases
- Identify specific sites of concern, and the nature of concerns for those sites.
- Provide feedback and partake in efforts with our suppliers to improve those sites – including, if necessary, the elimination of a supplier from a purchasing event.

• Gain insights into any ongoing efforts to improve, reduce and remediate issues that are found.

Risk Tier 2 Tier 3

CASE STUDY: MANUFACTURING IN CHINA

China manufactures⁴ across a multitude of industries. With that vast capability comes a broad array of business practices, some of which require enhancement.

Our contribution risk:

- Contribute risk of demanding unreasonable pricing or delivery timeframe
- · Directly linked through our supply chain

Status (via third-party affiliation):

Of the 24 factories within China of which the University had enhanced visibility, only two failed to take part in joint improvement activities with our third-party partners. The data supports the conclusion that awareness of modern slavery and human rights is growing, and that manufacturers generally understand the importance of engaging and working on human rights to meet their local legal obligations and customer expectations.

Excessive working hours (17)

Discrimination in employment and occupation (11)

Wages and benefits (11)

Recruitment and employment conditions (4)

Freedom of employment, association and collective bargaining (4)

OH&S (4)

Violation

Forced labour (3)

Violence and harassment (2)

Abusive termination of employment (1)

Excessive working hours (11)

OH&S (15)

Forced labour (8)

Wages and benefits (8)

Discrimination in employment and occupation (7)

Violence and harassment (5)

Recruitment and employment conditions (5)

Freedom of employment (4)

Abusive termination of employment (4)

Fair recruitment (3)

Security (1)

Suicide prevention measures needed (1)

Harassment of young females (1)

Environmental issues (1)

4 World Bank – Manufacturing Value Added. Accessed 9 February 2025

Remediations / status:

Tier 2 - China (6*)

- Human rights remediation completed via supplier and local community, police and government. (1)
- Remediation completed. (1)
- Audit responses indicate falsifying audit responses
 audit improvement needed. (1)
- Supplier participation and improvements appeared positive then supplier ceased contact. Ongoing. (1)
- Too early for remediation. (1)
- Inconclusive data on hold pending new data. (2)

Tier 3 - China (21*)

- Human rights remediation completed via supplier and local community, police and government. (1)
- Remediation ongoing. (3)
- Remediation concluded. Other issues noted have inconclusive data and are on hold pending new data. (3)
- Improvements to the auditing process needed.
 Multi-stakeholder discussions underway. Will include process to address recurring non-compliance or misleading behaviors. (1)
- Evidence supplier has improved behaviours with 80 per cent positive staff survey. Supplier actively engaged in forums and opening next tiers of supply chain. (1)
- Supplier participation and improvements appeared positive then supplier ceased contact. Ongoing. (1)
- Too early for remediation. (11)
- Inconclusive data on hold pending new data. (1)

CASE STUDY: MANUFACTURING IN MALAYSIA

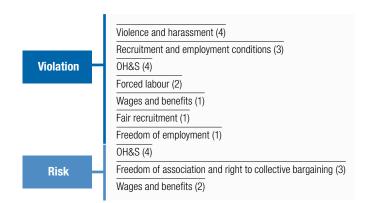
While Malaysia has a strong services industry, it also has high-risk industries such as rubber, food and electronic products⁵.

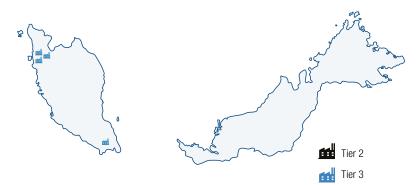
Our contribution risk:

- Contribute risk of demanding unreasonable pricing or delivery timeframe
- Directly linked through our supply chain

Status

Multi-party discussions including unions, buyers and factories have resulted in collective bargaining agreements and valid work permits being provided to migrant workers.





Remediations / status:

Tier 3 - Malaysia (4)

- Joint remediation via third parties, site and customers. Audit methodology and results being reviewed. Ongoing. (1)
- Accelerated audit underway to establish if recent human rights issues are due to work conditions. Ongoing. (1)
- Joint remediation unions, factory leads to collective bargaining agreement. (1)
- Discussions underway about payment in arrears to settle payment issues.
 Audits underway. (1)
- Local unions inform all migrant workers now granted valid work permits. (1)
- 5 Malaysian Investment Development Authority Manufacturing. Accessed 9 February 2025

^{*} Some factories perform both tier 2 and tier 3 functions.



CASE STUDY: MANUFACTURING IN TAIWAN

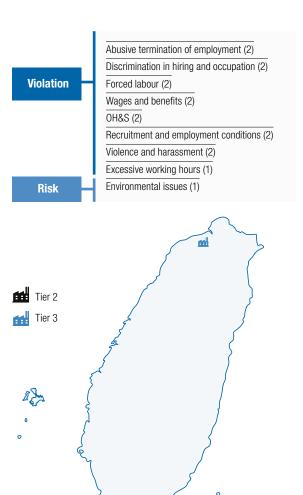
Taiwan plays a critical role in the world's semiconductor industry, producing most of the world's advanced semiconductors⁶.

Our contribution risk:

- Contribute risk of demanding unreasonable pricing or delivery timeframe
- Directly linked through our supply chain

Status:

Delays have been observed in repaying workers recruitment fees, and unpaid overtime was still an issue in 2024.



Remediations / status:

Tier 3 - Taiwan (2)

- Remediation positive and still underway. (3)
- Some workers still owed recruitment fees, but poor recruiting practices have stopped. (1)
- Some workers still indebted to lenders in home country. (1)
- Ongoing failure to pay overtime. (1)
- 6 Taiwan Economy Fast Facts. Accessed 9 February 2025.

CASE STUDY: MINING IN BOLIVIA

Mining is a key part of Bolivia's economy⁷, and global resource price reductions rapidly reach all the way down to the pay and treatment of mine workers.

Our contribution risk:

• Directly linked through our supply chain. This is the part of the supply chain furthest from the University, and often the most difficult to identify and influence. Two out of the 169 mines in this area produce raw materials which have been identified as being used in products that we purchase. Our ability to apply force in the market through our third-party partnerships has supported both the discovery and the commencement of resolution and remediation for these distant issues. Though not directly involved, this work has proved there is a direct link between these two mines and the University, and that the link can operate in both directions. The University can assist in drawing attention to these issues and encourage resolution, including through our Tier 1 supplier and the third-party partner network.

Status:

An industry-level approach of global buyers, industry and government coming together to resolve issues. Agreements between upstream industries and mines are being explored.





Remediations / status:

Tier 4+ - Mines - Bolivia (2)

Meetings underway between buyers, local industries and government.
 Global supply chain meetings occurring. Exploring agreements between upstream industries and mines. (2)

7 International Trade Association - Bolivia - Market Overview Accessed 9 February 2025.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

ASSESSING EFFECTIVENESS OF OUR ACTIONS

GOAL	WHAT WE DID	OUTCOME		
Contribute to the higher education sector				
Contribute to the Australia/New Zealand higher education sector approach to modern slavery.	Active participation in the AUPN Modern Slavery Working Group, including conducting a presentation and assisting specific universities. The AUPN now includes a number of Universities in New Zealand.	Presentation on high-risk apparel to 40 university attendees. Specific modern slavery risk management advice provided to three universities.		
Academic contributions				
Use academic expertise to assist in uplifting Modern Slavery Act reporting quality.	Monash Business School Modern Slavery Research updated their Disclosure Quality Report.	In 2024, published the FY2023 Modern Slavery Disclosure Quality Ratings ASX100 Companies Update and provide associated consulting services.		
Awareness and training of staff				
Increase modern slavery training and awareness.	Targeted training for key staff and assignment of training to all new staff. Reached 100% for our KPI related to training of key staff.	In 2024, 4626 staff completed modern slavery training, bringing our total staff trained to 13,549. To date, approximately 100 procurement, contract-related and legal staff have received live training in dealing with modern slavery in contracts.		
Increase staff, student and external audience awareness of both modern slavery and our Modern Slavery Act Report.	A coordinated communications campaign timed with our report being published.	Internal communications and University-wide channels including, social media.		
Recognising valuable contributions				
Recognising third parties that assist the University in its fight against modern slavery.	Ensured that a key partner and our joint effort was identified as such in our report.	Acknowledgement by Electronics Watch		

KEY PERFORMANCE INDICATORS

Annual KPIs are used to measure progress and set targets. These may be adjusted over subsequent reporting periods in line with ensuring relevance and continuous improvement.

Supplier onboarding (Monash Australia)

KPI: Percentage of supplier compliance (excluding one-time or low-value suppliers)

Target:	100%
Achieved:	100%

A total of 1375 new suppliers were onboarded through the gating process. A failure requires manual handling of the supplier's noncompliance with agreeing to modern slavery legal obligations. A review of the supplier gate failure must occur before a supplier can complete onboarding into our purchasing and payment systems.

Our KPI for onboarding suppliers through this gate is 100 per cent, and we reached our target of 100 per cent of these new suppliers being onboarded via the mandatory gate. By design, this process does not apply to all suppliers as it excludes low-value suppliers, one-time suppliers, and credit card transactions.

Training

KPI: Percentage of procurement, legal and executive staff completing training

Target:	100%
Achieved:	100%

In 2024, 49 key staff (100 per cent KPI reached) and 4577 other staff completed modern slavery training.

Reporting year | Completed

2022 | 5162

2023 | 3761

2024 | 4626

Total trained: 13,549

Modern Slavery Reporting by fund managers

KPI: Percentage of fund managers providing annual update on their modern slavery report

Target:	100%
Achieved:	100%

Monash University's fund managers are required to report annually to the University, including a mandatory update of modern slavery-related actions taken over the past 12 months. All submitted modern slavery reports were assessed and met the required level of detail. Each report outlined appropriate measures, such as supplier risk assessments, investment risk evaluations, and staff training initiatives. The reporting on modern slavery progress by fund managers has achieved a 100 per cent KPI compliance.

Update offshore partners review process (Monash College)

KPI: Percentage of offshore partners completed the updated desktop review process

Target:	100%
Achieved:	100%

Monash College has taken a risk-based approach in identifying the various risk categories in offshore partners and conducted a high-level risk assessment exercise, with the risk assessed as low to medium. In addition, all new partners have a modern slavery clause in the provider agreement.

The methodology to understand offshore risks was developed in 2020 and is based on sector, geography, supply chain and internal operations/ human rights. It is evaluated based on the self-assessment questionnaire which has been completed by all current international partners. The country/geographic risk varies, based on the Australian Government's response rating to mitigating modern slavery risk by country, the latter has been determined according to Global Slavery Index, Walk Free Foundation and Minderoo Foundation.

The College undertook the Modern Slavery Risk Assessment for Tianhua College in 2024, with the findings reported to the Audit and Risk Management Committee.

- Tianhua staff are directly employed by Tianhua College.
- There is minimal to no outsourcing of Tianhua College's business or operations
- The partner agreement between Monash College and Tianhua College contains a modern slavery clause.

COMPLIANCE MONITORING

Annual Compliance audit: Contract terms

Target:	100%
Achieved:	100%

Strategic Procurement and the Office of the General Counsel undertook a compliance audit of several executed agreements of different types. This is to ensure that the audit reflects the various approaches in place to manage modern slavery terms in agreements:

- Standard modern slavery terms
- · High-risk modern slavery terms
- High-risk electronics modern slavery terms
- Bespoke terms negotiated on a case-by-case basis.

The following audits occurred of different contract types:

- Two new low-risk agreements.
- Six new high-risk agreements.
- One new contract variation to an existing agreement where modern slavery terms should have been triggered for addition to the agreement due to a variation occurring to an older agreement.
- One bespoke agreement.

Low Risk Agreement Audit

Agreement Type	Clauses observed	Audit Outcome
Local Contractor	Low risk, as per approved template	Pass
Local Contractor	Low risk, as per approved template	Pass
Variation to existing	Low risk, as per approved template	Pass
		Compliance: 100%

High Risk Agreement Audit

Agreement Type	Clauses observed	Audit Outcome		
Cleaning Services	High risk, as per approved template. Additional clauses to increase transparency and work requirements, specific to cleaning	Pass		
Master IT Services	High-risk template and Electronics Watch clauses	Pass		
Master IT Goods and Services	High-risk template and Electronics Watch clauses	Pass		
Master IT Goods and Services – Server supply with support and maintenance	High-risk template and Electronics Watch clauses	Pass		
Software Reseller	High-risk template and Electronics Watch clauses	Pass		
Master IT Hardware – Servers and services	High-risk template and Electronics Watch clauses	Pass		
Bespoke	The bespoke clauses were checked against written guidance provided to the Office of General Counsel by Manager Strategy Governance, Strategic Procurement – and matched	Pass		
Compliance: 100%				



PROCUREMENT

Strategic Procurement manages University-wide procurement policies and procedures.

The Strategic Procurement team annually completes the Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply eLearning program and test. Strategic Procurement leads the modern slavery reduction and elimination program for all in-scope entities and the preparation of the joint Modern Slavery Act Report for Monash University. They also provide subject matter expertise for all modern slavery-related issues across the University and its entities. Relevant entity staff have been engaged directly to understand their situation and procurement, and to assist with their compliance. Strategic Procurement is responsible for coordinating all procurement activity across the University, implementing procurement policy and procedures, and providing category management for strategic categories across the University.

Strategic Procurement also provides strategic sourcing support across the University, as well as expert support, advice and tools to all procurement specialists. Procurement specialists are in business portfolios for specialist procurement categories (such as Buildings and Property and eSolutions) and are responsible for the procurement and contract management of specified categories. Monash College and Monash University, Malaysia have their own procurement functions. They work closely with Monash University to drive alignment and the application of suitable policies and procedures where necessary.

Monash College, Monash University, Malaysia, Monash University, Indonesia, and World Mosquito Program representatives are part of the Modern Slavery Working Group. Monash University Foundation is managed within the portfolio of the Chief Financial Officer and Senior Vice-President. The Foundation operates within Monash University's Australian purchasing processes and has representation on the Modern Slavery Steering Committee.

OPERATIONS

Reporting structures are structured so that Monash University, the parent entity, is aware in all situations of operational concern and key decisions for all controlled entities. An operations representative is present on both the Modern Slavery Steering Committee and the Modern Slavery Working Group.

CONSULTATION AND ONBOARDING OF ENTITIES

The following key steps are undertaken for onboarding new entities. The first entity to commence onboarding was Monash College, followed by Monash University Malaysia, Monash University Indonesia, and World Mosquito Program.

Supply chain risk assessment:

The cleansing and inclusion of the entity's procurement data into our database. An assessment of the entity's specific risks within their home country as identified by the latest Global Slavery Index report.

Additional consultation specific to the entity, including:

- The identification of the unique risks and concerns the entity may have.
- Understanding the operations and supply chains the entity has in place.
- The identification of template agreements, processes, procedures, and any sourcing documents that may need to be reviewed, including any that may be in foreign languages.
- Relevant legal nuances (for offshore entities), including any existing modern slavery-related legal obligations that apply in their country.
- Planning and socialisation of timing, expectations and outcomes these are updated in conjunction with the entity representatives
- Subsequent phased introduction of the modern slavery program of work for that entity, followed by the commencement of a more detailed inclusion in the next annual Modern Slavery Act Report.

Training:

Key staff are identified and enrolled in the online modern slavery training module. Completion of training by key staff is monitored.

The entity's representative in the Working Group and/or the Steering Committee creates a central, knowledgeable channel back into the entity for all aspects of the program.

The degree to which these steps apply may vary. Reasons for this may include the provision of certain services by Monash University (the parent entity) to some related entities and variations in data availability. This may vary from entity to entity.

ASSESSMENT OF OFFSHORE ENTITIES

We continue to build on our previous year's discovery work to build a more comprehensive understanding of the risks facing our offshore entities and their existing operating methods. This allows us to identify in detail if any entities have areas in need of uplift. The areas assessed include identifying where offshore entities may utilise Monash University Australia policies, processes, legal support and agreement templates — or whether they have their own. In the event they have their own, we determine that a check is required to ensure they meet program requirements, and this may include the need to schedule future compliance checks. Though there were patterns, it has been confirmed that an entity-by-entity review is justified as there is subtle variation across entities requiring a bespoke approach to each to ensure there are no gaps in their operations and processes.



OTHER RELEVANT INFORMATION

THE MONASH UNIVERSITY FIVE-YEAR PROGRAM

Our five-year rolling program continues to evolve. Our flexible approach now includes cross-year themes and allows for rapid program adjustment as new issues are identified and prioritised. In addition to cross-year themes are more specific tasks each year.

2024	2025	2026	2027	2028
Identify risks in onshore research and education activities	Offshore research and education	Review of effectiveness of electronics solution (Electronics Watch)	Review of risks in procurement practices	Review of security services
Onshore research and education	Spot check of modern slavery clauses – offshore	Review of effectiveness of apparel panel	Review of human rights protections embedded in key policies, procedures and contracts	Modern Slavery website review
Onboarding assessment and tender questions	Program review and forward planning	Provide offshore entities with tools to standardise the monitoring of modern slavery requirements	Review of cleaning services	Scoring methodology for investment reports from our investment managers
Offshore agreement and sourcing template updates	Remediation framework completion	Integrated modern slavery grievance approach	Review of apparel risk mitigations	



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- Dr Ingrid Landau, Senior Lecturer, Department of Business Law and Taxation.
- Professor Dayna Simpson, Professor of Responsible Operations and Supply Chain Management.

FACULTY OF LAW

 Associate Professor Samantha Currie, Associate Dean (Equity, Diversity & inclusion), Faculty of Law.

FACULTY OF ARTS

 Dr Matt Maycock, Senior Lecturer in Criminology, Director of the Bachelor of Criminology and Bachelor of Criminology & Policing degrees.



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