

Bond University

Modern Slavery Act Statement 2020





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INTRODUCTION

Bond University is committed to treating all workers with respect and dignity, ensuring safe working conditions and conducting ethical operations. Bond University has produced this first Modern Slavery Statement for the period January to December 2020 aligning with the university's financial reporting year pursuant to the Modern Slavery Act 2018 (Cth).

REPORTING ENTITY

Bond University is Australia's first private, not-for-profit university with approximately 4,000 enrolled students. The University has annual turnover of circa \$200 million. The Act's reporting requirement applies to large businesses and other entities in the Australian market with annual consolidated revenue of at least AUD\$100 million. Bond University will meet this threshold for the foreseeable future.

STRUCTURE, OPERATIONS & SUPPLY CHAINS

Bond University Limited (A.C.N. 010 694 121) is incorporated as a company limited by guarantee. The University's controlled entities include Campus Operations Pty Ltd and Lashkar Pty Ltd. Campus Operations Pty Ltd operates student accommodation including food and beverage facilities and Lashkar Pty Ltd owns and manages the Bond Institute of Health and Sport building located in Robina, Queensland.

Activities undertaken by the University to pursue its business objectives as a Higher Education Provider in Australia and overseas include:

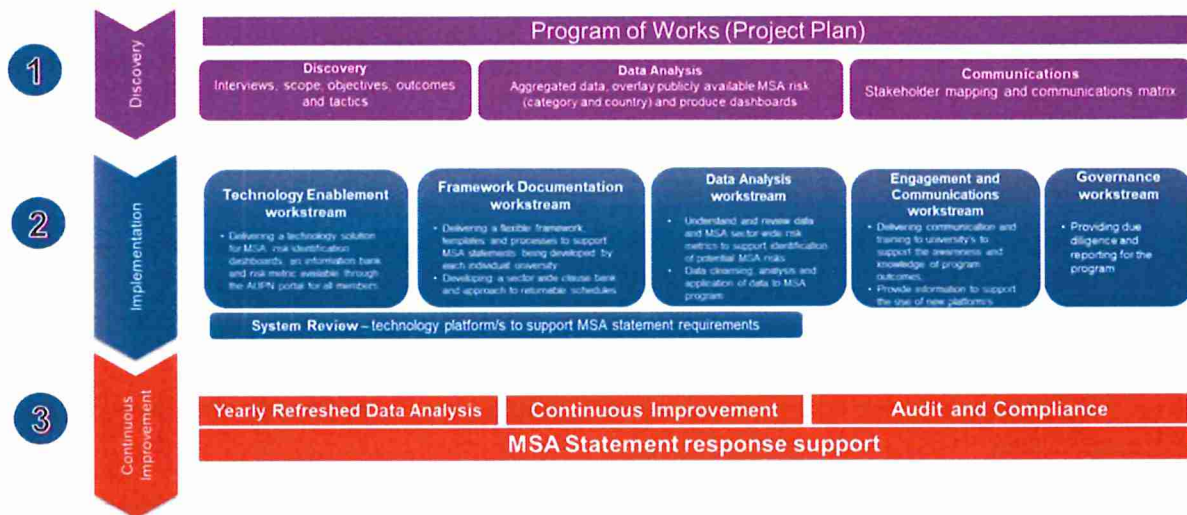
- Direct employment of workers – Approximately 1,200 staff employed predominantly domiciled in Australia. The Bond University Act 1987 provides for two staff associations with Professional staff engaged under a Collective Agreement in the federal jurisdiction and a series of negotiated agreements (MOUs) between the University and the Academic and Professional Staff Associations.
- Recruitment of students directly and via agents from 60+ countries. In 2020 ~38% of tuition revenue was generated from international students.
- Maintenance and construction of buildings and facilities. All University facilities and buildings are located on the Gold Coast.
- Procurement to deliver innovative and agile teaching and learning environments with the increasing use of technology and online platforms. Tangible items are sourced primarily from domestic manufacturers/retailers. Intangible items such as database access and subscriptions sourced directly from both domestic and internationally based suppliers.
- Student accommodation provision for up to 590 students and food and beverage services consumed on campus.

RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS & SUPPLY CHAINS & ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

At the start of 2019, Bond University collaborated with the Australian Universities Procurement Network ("AUPN") and established Modern Slavery Working Group (MSWG) with all Australian universities actively contributing time and effort on a voluntary basis. The collaborative approach was identified as the most effective way to combat modern slavery through our supply chain.

The program aims were to deliver the following:

- a collection and aggregation of sector procurement data;
- a solution that allows members to identify risk, focus resources and inform action – supported by a third-party technology enablement solution;
- a sector approach/action plan for addressing, mitigating and/ or remediating identified risks;
- continuous improvement.



The collaborative approach includes an analysis of consolidated expenditure data to identify high risk goods and service categories and initiating contact with key suppliers on behalf of members. ArcBlue Consulting were engaged to facilitate data gathering and supporting development of the AUPN Modern Slavery Program and a Modern Slavery Risk Dashboard. The dashboard is available to all AUPN members and to date, 38 Australian universities have submitted spend data (\$25.3 billion of expenditure data collected over 2.5 years). The dashboard provides an indication of a university's risk across spend categories and country locations using supplier head office location. These risks have been determined through publicly available modern slavery risk guides (eg. Global Slavery Index), prevalence information and together with some reasonable assumptions that continue to be refined as further data is gathered.

Bond University and AUPN recognises that there is more to be done and will continue to develop their supplier engagement approach and remediation processes in order to gain more visibility of the supply chain and leverage the sector's buying power to influence better purchasing practices.

Bond University has various policies listed below which assist in managing human rights risk within our business and supply chains.

- Ethical Conduct
- Code of Conduct
- Conduct for Working with Children and Young Persons
- Public Interest Disclosure
- Sexual Exploitation, Abuse, Assault and Harassment
- Human Research Ethics
- Bullying and Harassment
- Workplace Health and Safety

- Procurement
- Student Regulation
- Student Code of Conduct

Bond University's primary source of revenue is generated from tuition revenue and the main input to deliver this service is domestic salaries. With staff based primarily in Australia and engaged under applicable Collective Agreements and MOUs the universities risk is low compared to industries such as clothing and apparel or outsourced services. However, there are risks within the universities supply chain that may be directly linked to modern slavery for infrastructure and facility services.

ASSESSMENT OF THE EFFECTIVENESS OF ACTIONS AND FUTURE COMMITMENTS

Bond University aims to continuously improve our processes to address this challenging and complex issue. Initial design of our program was a result of engagement with industry and a review by subject matter expert "Pillar Two". Our current baseline risk assessment of suppliers benchmarked against the Australia University Sector compares consistent with the average. Reducing the utilisation of our suppliers deemed high risk will be our long-term key performance indicator.

Bond University is proud of our progress to date. We are committed to the ongoing delivery of our initiatives and partnering with our stakeholders to eradicate modern slavery.

Over the next year, our focus will be on:

- Continuing to develop the maturity of our supplier assurance program and deepen our supply chain knowledge.
- Development of training key personnel to detect and prevent modern slavery and greater awareness across the university and our suppliers.
- Refinement of university policies and procedures to further support the endeavours of the Modern Slavery Act

Through this multi-faceted approach to preventing and addressing modern slavery, Bond University is confident we will see meaningful progress on this global issue at our University and in the businesses that we engage with.

Signed



Professor Tim Brailsford
Vice Chancellor and President

This statement was approved by the Council of Bond University Ltd on 25 June 2021.