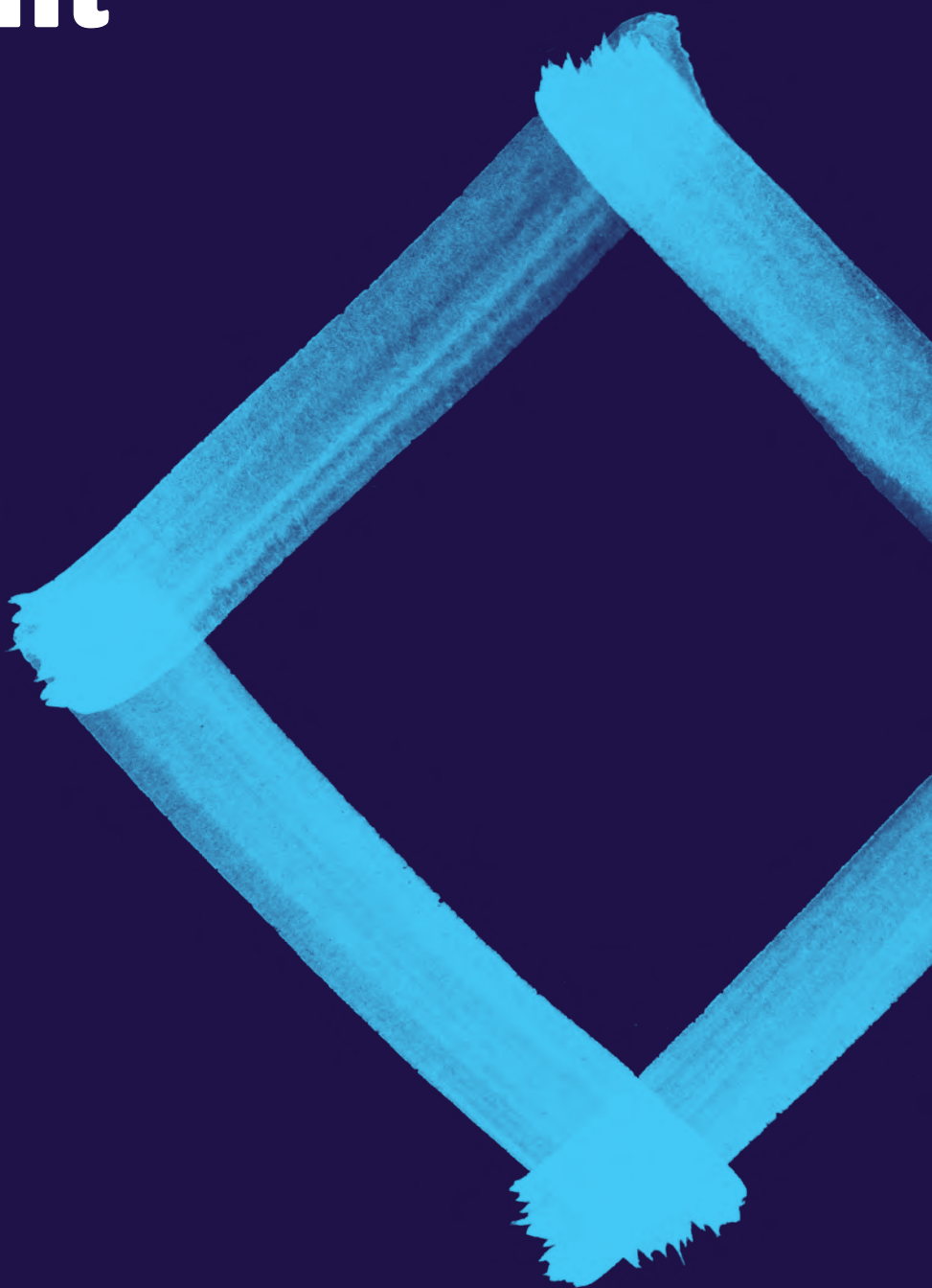


**VICTORIA
UNIVERSITY**

2024 Modern Slavery Statement



Introduction

Victoria University’s commitment to combating modern slavery

Victoria University (VU) plays a critical role in addressing modern slavery, guided by one of its core values – “always be ethical.” This value underpins the University’s commitment to upholding human rights and promoting ethical conduct across all areas of operation.

Understanding modern slavery

Modern slavery refers to situations where individuals are exploited through coercion, threats, or deception, resulting in the loss of their freedom. These severe forms of exploitation include:

- ◆ Human trafficking
- ◆ Slavery
- ◆ Servitude
- ◆ Forced labour
- ◆ Debt bondage
- ◆ Forced marriage
- ◆ The worst forms of child labour

VU recognises modern slavery as a significant global issue and is committed to taking meaningful action to prevent and address associated risks within its operations and supply chains.

Our commitment

The University is dedicated to:

- ◆ Respecting and protecting human rights
- ◆ Conducting business ethically with all partners and suppliers
- ◆ Identifying, assessing, and managing modern slavery risks
- ◆ Taking proactive steps to influence positive change in areas within our control

Modern slavery risk categories

Modern slavery risks may arise from various sources, including:

- ◆ Supplier Risk – Organisations that have breached modern slavery laws or failed to uphold ethical standards
- ◆ Supply Category Risk – High-risk industries such as textiles, electronics, cleaning, agriculture, extractives, and fishing
- ◆ Country Risk – Geographic locations where modern slavery is more prevalent due to weak labour protections, political instability, or systemic poverty

Statement scope

This statement is made by Victoria University pursuant to the *Modern Slavery Act 2018* (Cth) and covers the reporting period for the 2024 calendar year.

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Acknowledgement of country

Victoria University (VU) acknowledges, recognises and respects the Ancestors, Elders and families of the Bunurong/Boonwurrung, Wadawurrung and Wurundjeri/Woiwurrung of the Kulin who are the traditional owners of University land in Victoria, the Gadigal and Guring-gai of the Eora Nation who are the traditional owners of University land in Sydney, and the Yugara/YUgarapul people and Turrbal people living in Meanjin (Brisbane). These groups are the custodians of University land and have been for many centuries. We acknowledge that the land on which our campuses stand is the place of age-old ceremonies of celebration, initiation,

and renewal. The Kulin, and Eora, Yugara/YUgarapul and Turrbal peoples' living culture continues to have a unique and important role in the life and culture of these regions.

VU is committed to Protecting Country to build better relationships and equal partnerships between the wider Australian community and Aboriginal and Torres Strait Islander peoples. All staff, students and visitors to VU should acknowledge, understand and respect the significance of recognising and respecting Traditional Owners.

About us

Victoria University is a body corporate and politic in accordance with the *Victoria University Act 2010 (Vic)*.

For more than 100 years, VU (ABN 83 776 954 731) has offered accessible education to students in Melbourne's west and beyond from campuses across Melbourne's west and in the city – as well as campuses interstate at VU Sydney and VU Brisbane. It also offers courses with partner institutions throughout Asia.

VU has a subsidiary company, VU Online Pty Ltd (ABN 17 623 496 186), which is responsible for the University's wholly online course offerings.

Victoria University is a proud dual sector university with a comprehensive offer that spans vocational education, undergraduate and postgraduate degrees, all the way through to doctorates. This means students have greater flexibility, multiple entry and successful exit points, and positions graduates for strong career outcomes and lifelong learning.

The VU Block Model® is VU's distinctive approach to higher education. Students study one subject at a time, in smaller, interactive classrooms, and receive timely feedback before moving onto the next subject.

Victoria University is the first in Australia, and largest in the world, to deliver this style of innovative learning. This demonstrates VU's commitment to student-centricity, equity and academic excellence. With seven years of exclusive Block delivery, there is overwhelming evidence that this model has had profound impact on retention, completion, success, and overall student satisfaction.

Ranked in the top 3% of universities globally and with applied and impactful research that addresses the challenges of people, place and planet, VU offers world-class academic opportunities.

\$616.9m
Consolidated Revenue



49,106
Students



2,295
Staff



7
Campuses



3,046
Suppliers

2024 snapshot

49,106 total students

37,025 Higher Education (HE) students

12,081 Vocational Education and Training (VET) students

Student Equity Participation Rates

35.7%
HE

Student Equity Success Rates

92.1%
HE

Student Equity Participation Rates

51.7%
VET

Student Equity Success Rates

82%
VET

42.2%

of VU HE students are the first in their family to go to University, with a

93.4%

success rate

18,542

International students

11,519
Onshore

7,033
Offshore

from

113

countries

48%
HE

and

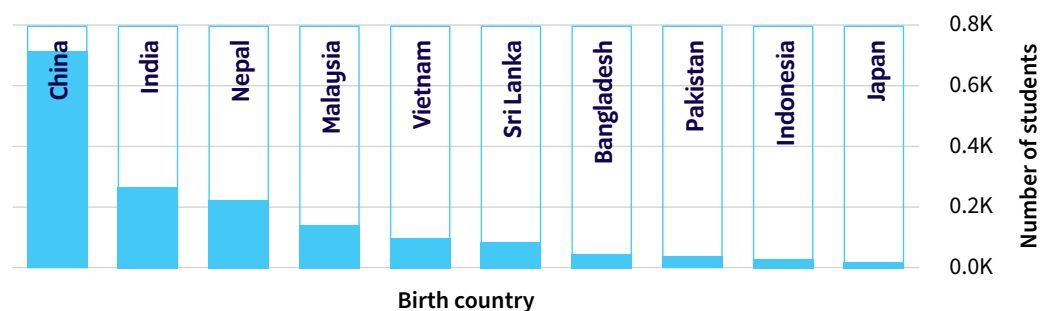
69%
VET

students live in Melbourne's West

35%

of domestic students were born overseas

Top countries of origin (excluding Australia)



295,000
alumni from over
140
countries

Education Rankings

QILT Student Experience Survey Results:

#1 in Victoria and **#6** in Australia for **Quality of Entire Education**

#1 in Victoria and **#2** in Australia for **Peer Engagement**

#1 in Victoria and **#6** in Australia for **Skills Development**

NOTES:

- Students may be counted in multiple sections of the same table but will only be counted once in the totals. Therefore, totals may be lower than the sum of their parts. This applies to all the figures in the snapshot
- Equity Rates: Aggregated measure that includes First Nations Peoples; Non-English-Speaking Background; Disability; Low socio-economic status; Rural/ Remote. Excludes International.

Research Rankings

#70 for **Times Higher Education** Young University Rankings 2024

#7 for **Sport Science** (for the 2nd year running) – Shanghai Ranking 2024

#43 for **Sports Related Subjects** – QS World University Ranking by Subject 2025

- HE success rates: Passed Load as a proportion of assessed load for domestic, onshore, commencing and continuing students in all qualification levels who are in one or more of the equity groups. Excludes international and First Generation students.
- VET Success Rates: Passed Load (in Effective Hours) as a proportion of Assessed Load (in Effective Hours) for domestic, onshore, commencing and continuing students in all qualification levels who are in one or more of the equity groups.
- First-in-Family student participation includes domestic and international.

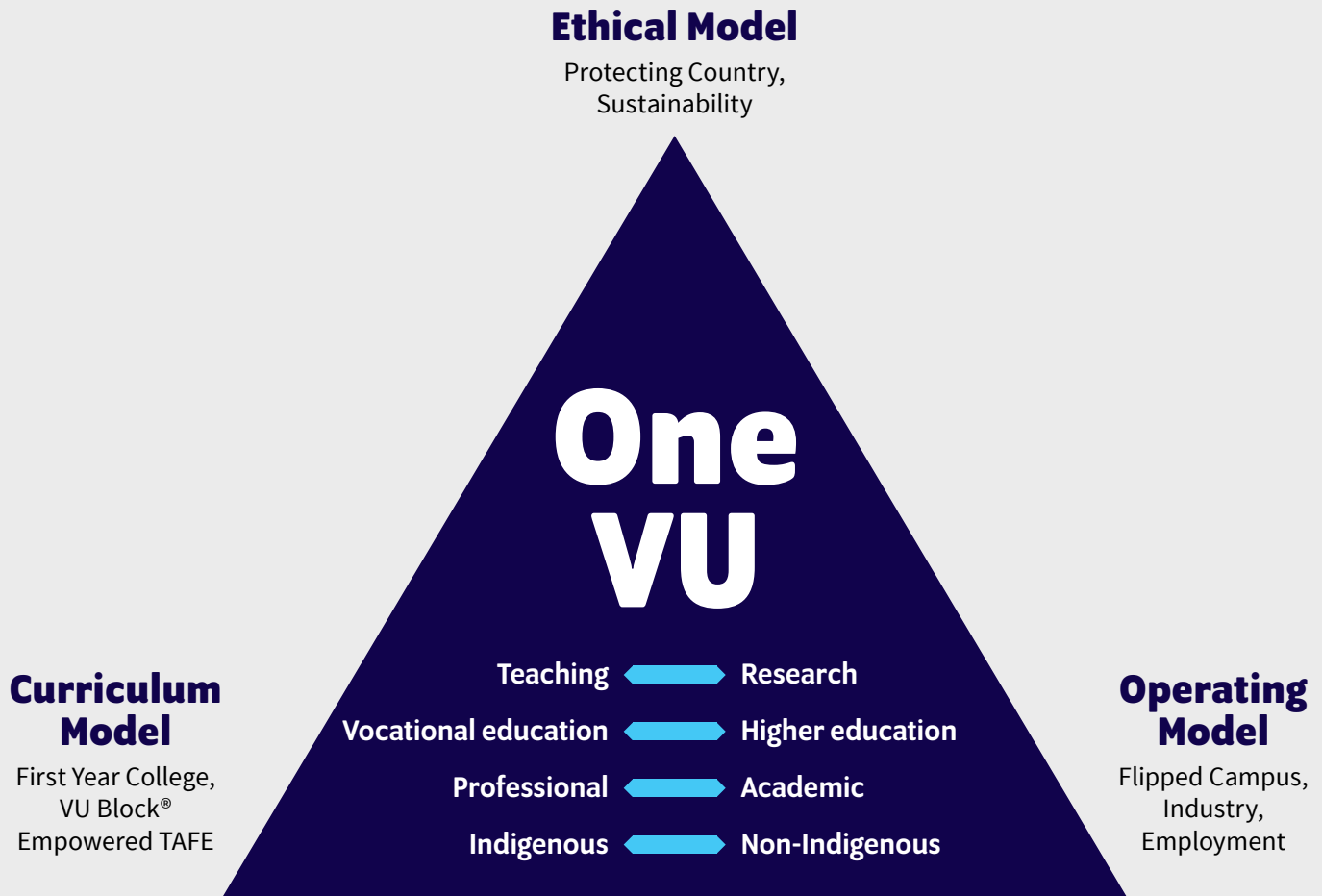
Our purpose

VU emboldens its people to design their future and has a deep commitment to protecting Country.

Our purpose is the heartbeat of our Strategic Plan 2022–2028: Start well, finish brilliantly. It is about why we do what we do, the impact we have on people's lives and why we insist on excellence.

Victoria University emboldens and supports its students, colleagues, allies, partners, alumni and friends to shape not only their own futures but also the wider world in which they live – through learning, research, career opportunities and community and industry development. We are of the west and of the world.

Protecting Country is about people, place and planet. It is a community-driven movement towards long-term social, cultural, physical and economic prosperity and sustainability. We honour this commitment.



Victoria University Strategic Plan 2022-28: Start well, finish brilliantly

The VU Strategic Plan has proven to be ambitious, focused and progressive.

Developed in 2021, the strategy has a clear vision for VU's future through:

- Harmonisation of TAFE and Higher Education.
- A commitment to equity and excellence through an intersectional lens.
- Putting industry at the core through a unique 'Flipped Campus' model.
- Focused research that responds to global real-world challenges.

Delivering on our strategy means shaping a dynamic and diverse workforce, and making a difference in our region and around the world – with students and their success at the heart of everything we do.

Our purpose

Victoria University emboldens its people to design their future and has a deep commitment to protecting country.

Our vision

To be a global leader in dual-sector learning and research by 2028.

Strategic Drivers

To achieve our vision, we have identified five strategic drivers. Our vision is big and ambitious. It is also achievable.



Our vision

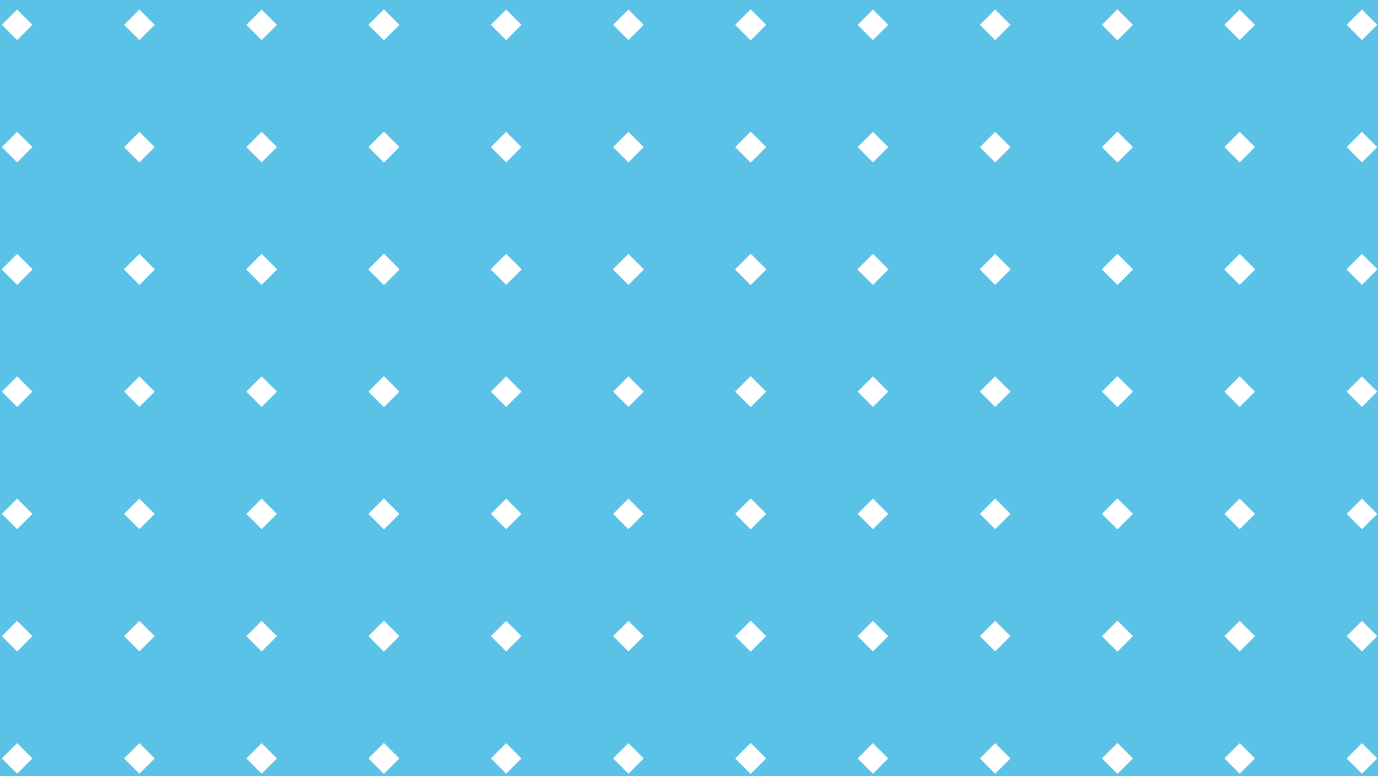
To be a global leader in dual-sector learning and research by 2028.

Our principles and values

Our Strategic Plan has eight core principles to guide our trajectory. Each one is powerful and particular. Each one has a strong sense of pride and purpose. And each one is ‘very VU’; describing the type of institution which we are proud to call our own.

- 1. We are a partnering institution – we cannot do it alone.
- 2. We honour Indigenous cultures and our roots in Greater Western Melbourne.
- 3. We are the university of inclusion, opportunity and success – enriching both lives and careers.
- 4. We are revolutionising tertiary education through the VU Block Model and using the power of our dual sector capabilities.
- 5. We are resourceful, creative, adaptive and excellent in all of our learning and teaching and research.
- 6. We are digital learning leaders.
- 7. We commit ourselves to working for the health and sustainability of our planet.
- 8. We are proudly progressive. We care – and we act.

Our strategy is also underpinned by our values – to be Always Welcoming, Ethical, Shaping the Future, Together. These important values go beyond vocabulary, they are a reflection of our beliefs and our ethics which in turn influences our practice.



Our governance

Governance & risk

Victoria University’s governance framework, among other things, ensures responsibilities of the Council, Academic Board and Executive Team to meet the obligations of the *Victoria University Act 2010 (Vic)*.

Risk management is an integral part of Victoria University’s planning and decision-making processes. The University has risk management processes in place consistent with the Victorian Government’s Risk Management Framework and the Australian Risk Management Standard (AS ISO 31000:2018).

The University Council, the Audit and Risk Committee and the Executive Team have undertaken regular reviews of strategic and enterprise risks to reflect changing internal and external operating environments. This includes collaborating on a Risk Appetite Statement which articulates the University’s willingness to accept a measured degree of risk in pursuit of strategic objectives, while balancing good governance and ethical values. The statement serves to guide decision-making across the University.

The most material risks identified through VU’s framework include the following:

External environment

A large number of factors outside of VU’s direct control are being monitored through our leadership and governance bodies. Those include changes in the education landscape, government policies, funding changes, geopolitical risks, economic conditions, Federal and State elections, pandemic or other external disrupting events.

Strategic risks

Risks which VU has more control over, but that remain strategic in nature include themes around academic quality, partnerships, financial sustainability, government relations, University culture, delivery of major projects, foreign interference, and climate change.

Operational risks

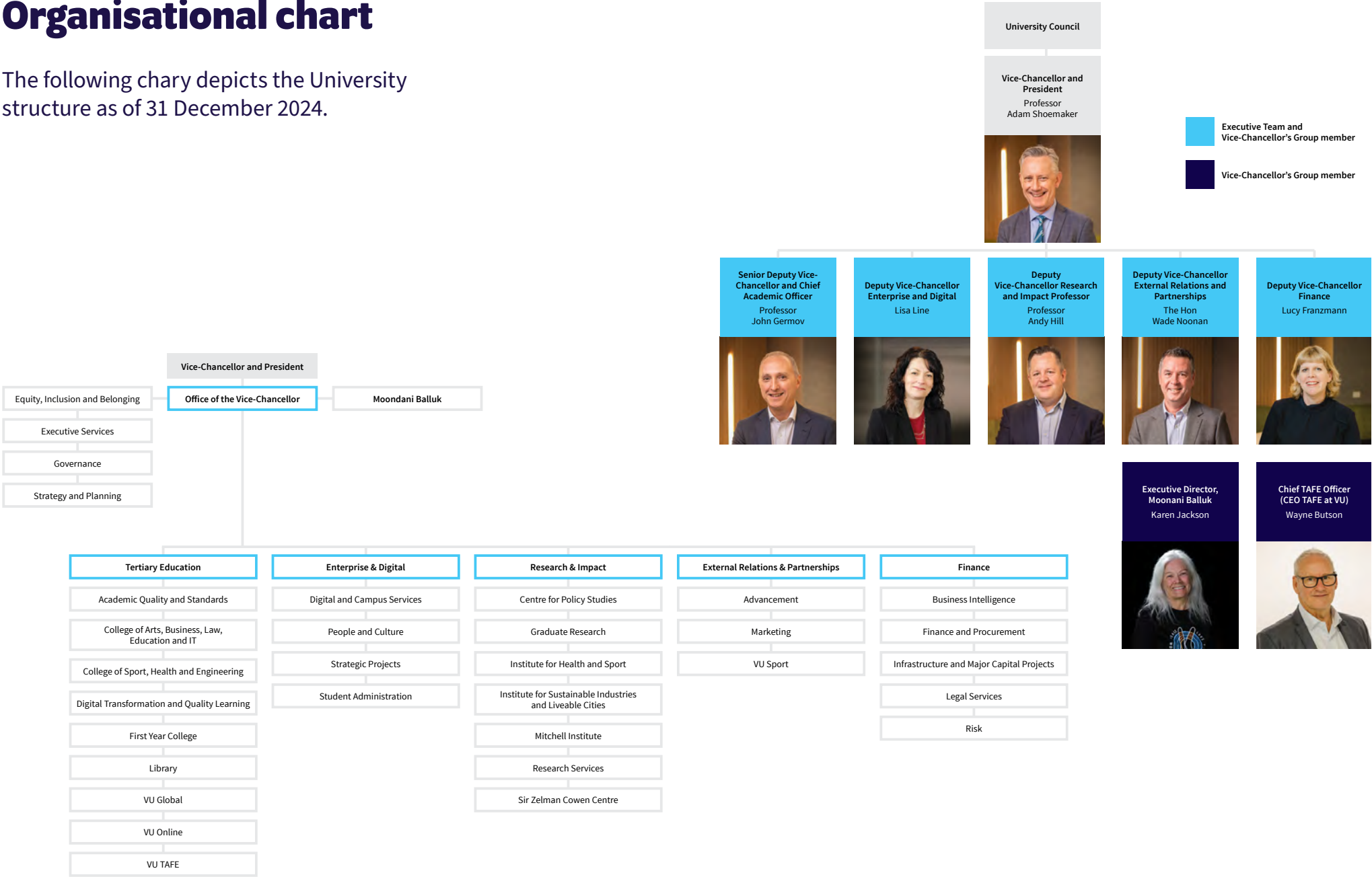
These are complemented by material operational risks, including in the area of work health and safety, business interruption, information management, cyber security, regulatory and legislative compliance, workforce capacity and capability, and financial and asset management.

These risks are controlled through strong governance, robust enterprise planning with frequent monitoring, and well-defined internal processes, policies and protocols.



Organisational chart

The following chary depicts the University structure as of 31 December 2024.



Sustainability









Universities have a pivotal role to play in addressing the urgency of climate change. We must lead the way by educating the next generation, engaging in novel research, and transforming our own practices to exemplify sustainability.

Our Sustainability Policy – which puts into practise our enterprise-wide commitment to Protecting Country – along with the United

Nations Sustainable Development Goals (SDGs) provides the frameworks for us to enact this change.

While there are accomplishments to be celebrated, we must remember that there is always more to be done. The path to sustainability requires ongoing collective action and commitment

Our global Times Higher Education (THE) 2024 impact rankings

	<div>SCORE</div> <div>67.4 out of 100</div> <div>RANK</div> <div>401-600 out of 1498 institutions</div>
	<div>SCORE</div> <div>68.0 out of 100</div> <div>RANK</div> <div>201-300 out of 1681 institutions</div>
	<div>SCORE</div> <div>84.6 out of 100</div> <div>RANK</div> <div>19 out of 867 institutions</div>
	<div>SCORE</div> <div>81.8 out of 100</div> <div>RANK</div> <div>38 out of 1108 institutions</div>
	<div>SCORE</div> <div>75.3 out of 100</div> <div>RANK</div> <div>101-200 out of 825 institutions</div>
	<div>SCORE</div> <div>71.5 out of 100</div> <div>RANK</div> <div>73 out of 924 institutions</div>
	<div>SCORE</div> <div>73.8 out of 100</div> <div>RANK</div> <div>101-200 out of 1086 institutions</div>
	<div>SCORE</div> <div>92.2 out of 100</div> <div>RANK</div> <div>60 out of 2031 institutions</div>

Progress on Victoria University's net carbon zero plan – 2024 Highlights

Victoria University (VU) made significant strides in its sustainability journey in 2024, advancing its commitment to achieving net carbon zero and fostering climate resilience across its campuses and communities.

Community engagement and tree planting

- ◆ Over 2,500 trees were planted by 200 volunteers during the 2024 Community Tree Planting Day, bringing the total to 12,500 trees planted since 2022.
- ◆ This initiative was supported by the Victorian Government's More Trees for a Cooler, Greener West program, contributing to its broader goal of planting 500,000 trees to improve canopy cover and reduce urban heat in Melbourne's western suburbs.

Climate leadership and collaboration

- ◆ VU co-hosted the Climate Emergency Conference in partnership with Maribyrnong City Council, convening over 200 local government representatives to exchange ideas and strategies for effective climate action.

Laboratory and campus sustainability

- ◆ VU achieved Platinum Certification from My Green Labs in recognition of significant sustainability improvements across laboratories and TAFE facilities, including:
 - Participation in the International Laboratory Freezer Challenge, promoting energy-efficient cold storage practices.
 - Styrofoam recycling introduced at the Werribee Campus.
 - Implementation of TerraCycle Zero Waste Box systems, with plans to expand to additional campuses in 2025.
 - Ongoing exploration of textile recycling solutions, with trials anticipated in 2025.

Student and staff engagement

- ◆ The Green Ambassador Network was launched, bringing together 20 student and staff representatives to champion sustainability initiatives and shape the University's environmental future.

Research, knowledge exchange, and global engagement

- ◆ VU conducted research on thermal comfort, urban overheating, ventilation, and green infrastructure to support evidence-based climate adaptation.
- ◆ Hosted knowledge-sharing forums with stakeholders from Melbourne, Riyadh, and Myanmar, fostering international dialogue on localised climate resilience strategies.

Energy efficiency and infrastructure upgrades

- ◆ Implemented a wider indoor temperature control range (19–25°C) in buildings where feasible, reducing energy use and improving environmental performance.
- ◆ Continued upgrades to critical building infrastructure, including:
 - Replacement of electrical switchboards
 - Installation of LED lighting
 - Modernisation of heating and cooling systems

Culture, inclusion and diversity

- ◆ Victoria University is proudly one of the most diverse universities in Australia. Students, staff, alumni and partners come here to be part of a movement of excellence, contemporary thinking, creativity and innovation and also to belong.
- ◆ Our words set the stage, but our actions set the agenda. And while we celebrate our achievements, we know there is always work to do.

Cultural inclusion and racial equality

In 2024, VU's annual Iftar was co-hosted by the Islamic Students Society and the Cultural Inclusion Network – a powerful, community-led event that created a sacred space for connection and celebration, through the collective sharing of poetry, prayer and food.

Sorry Day and Reconciliation Week at VU saw reflective engagement, drawing on non-Indigenous participants to better understand the ongoing struggles of First Nations Peoples. These events provided opportunities to learn and take meaningful action in solidarity. A standout moment was the presentation by Traditional Owner Gary Murray, who addressed "Victoria's unfinished colonial business – Treaty, Truth and Transformation." The week also featured a tour of the Aboriginal History Archive at VU, offering staff and students a deeper insight into the rich history and heritage of the land they occupy.

VU established the inaugural First Nations Universities and Local Government Community of Practice, which brings together Aboriginal and Torres Strait Islander people working in universities and local government in Melbourne, offering them an opportunity to connect, share experiences, and network in a culturally proud, supportive and safe environment.

Throughout 2024, the Decolonising Solidarity book clubs for staff continued, providing a space for meaningful dialogue on decolonisation and solidarity.

VU and our watch

In 2023, VU signed a five-year strategic partnership with Our Watch, a unique in-the-sector partnership which is a cornerstone of the institution's comprehensive approach to eradicating gender-based violence in all its forms. The Equality, Inclusion and Belonging Unit are leading this whole-of-institution approach at VU, embedding a decolonizing gender equality focus across the learning and teaching, research, student life and workplace functions.

This partnership was honoured with recognition as finalists for the ANZ-PBA Partnering Award in the Educating for Equality category, underscoring the impactful work being done to foster long term cultural change.

Significant achievements through the partnership was the establishment of the VU TAFE Respect and Equality Taskforce, convened by the CEO of TAFE and supported by Our Watch specialist staff; as well as the pilot of the Building Respectful Futures Together eLearning module through VU's network of senior leaders, and the delivery of Changing the Picture and Men in Focus workshops to VU leaders and staff.

Gender equality

Our extended efforts, both within the University and in the broader community, reflect a deep commitment to creating lasting cultural change and to lead with equity and respect.

Highlights include:

- ◆ VU's largest-ever contingent for the Walk Against Family Violence, as part of the 16 Days of Activism Against Gender-Based Violence campaign, saw over 80 staff, students, and corporate partners including the Vice-Chancellor and Executive Team.
- ◆ The International Women's Day Forum, organised by the Research Action Group for Equality and Inclusion of Gender and Diversity, highlighted the exceptional contributions of women researchers.
- ◆ Comprehensive training on responding to disclosures of sexual assault and harassment was provided to multiple and crucial cohorts, including residential advisers at UniLodge, student mentors, security contractors, and teaching staff.
- ◆ Two student-focused Respect Weeks were held in April and September, featuring activations on sexual and reproductive health, respectful relationships, and confronting misogyny.
- ◆ Expert advice was contributed to VU's Gender-Based Violence Prevention Review project, helping to shape strategies for lasting change.
- ◆ A Prevention in Teaching and Learning program was launched in collaboration with VU Criminology academics, focusing on embedding gender-based violence prevention in our academic curricula.

Culture, inclusion and diversity (cont.)

Pride, respect, equality and visibility

- ◆ VU is committed to initiatives that promote equality, visibility, and support for all students, staff, and allies ensuring that everyone feels safe, valued, and empowered to express their authentic selves.

Highlights include:

- ◆ The Chosen Name Project, an end-to-end solution for staff and students to update their names, gender markers, pronouns and email addresses in all of VU's information systems. Thousands of students have updated their details since this project went live in 2023.
- ◆ VU's participation in the annual Midsumma Pride March. Despite the heat, 54 members of the VU community attended to celebrate LGBTQIA+ inclusion and #VUPRIDE.
- ◆ The Pride Network hosted pop-ups across campuses throughout the year, inviting the VU community to learn more about LGBTQIA+ inclusion initiatives, and encouraging active allyship.
- ◆ Awareness building around the Hidden Disabilities Sunflower and non-visible disability continued to be a core commitment in 2024. Over 700 Hidden Disability Sunflower lanyards and over 200 sunflower pins were given to staff. A screening of the documentary "Life is a Battlefield" was held for the International Day for Persons with a Disability, featuring the subject of the film, Uli Cartwright, as a guest speaker.
- ◆ The Access & Inclusion Stakeholder Group (AISG) was formalised this year, meeting quarterly to discuss and strategise the university's projects and initiatives to improve accessibility at VU and ensure the university builds its disability confidence.
- ◆ The Progressive Inclusivity suite of eLearning modules have recorded 1325 completions to date. The modules include the award-winning modules Together Against Racism, Bystander Awareness and Action and Understanding and Celebrating LGBTQIA+ Identities.

Overview of VU's workforce

VU is confident that its staffing model does not create or result in any modern slavery risks.



2,295 Total staff

including ongoing, fixed term, casual and sessional

1.4% SELF DESCRIBED

38.3% MEN

60.3% WOMEN

1% FIRST NATIONS



1,718 Full time equivalent

including ongoing and fixed term

1037 Professional

674 Academic

includes VET teaching staff

7 Senior Management

Employment and conduct principles

VU is committed to providing a purpose and values-based culture focused on safe, inclusive, respectful, and productive workplace behaviours.

The Appropriate Workplace Behaviour Policy guides staff to make the right choices. It outlines VU's commitment to upholding our values by establishing core professional and behavioural expectations. These values shape how colleagues can expect to be treated when working together, applying for jobs, and participating in other opportunities at VU.

This policy is underpinned by other associated policies and procedures around recruitment and selection; discrimination and harassment; sexual assault and sexual harassment; disability and accessibility; bullying prevention and management; diversity, inclusion and equal opportunity;

staff complaints resolution; and health, safety and wellbeing. Together they ensure that all recruitment and selection decisions are made in line with the principles of equity, fairness, and transparency.

The Respect @ Work Action Plan further embeds our commitment to respect and the prevention of gender-based violence in the workplace.

A review of some policies and procedures was conducted in 2024 to further enhance staff experience. This resulted in the refinement and/or consolidation of the following policies and procedures:

- Special Studies Program Policy and Procedure
- Professional Development and Performance Policy and Procedure
- Probation Procedure
- Recruitment and Selection Policy and Procedure.

Our Values

Always Welcoming, Ethical,
Shaping the Future, Together

Overview of VU's supply chain

Victoria University (VU) operates under a centralised procurement model, governed by a Purchasing Policy & Procedure, which ensures consistency and efficiency in the procurement of goods and services across the institution. The Procurement function handles the strategic sourcing of goods and services on behalf of VU's various departments, along with the management of centrally contracted suppliers.

Procurement values

VU is committed to maintaining a robust and transparent procurement process, underpinned by the following core values:

- ◆ Open and Effective Competition: The procurement process is impartial, transparent, and designed to encourage competitive offers from suppliers.
- ◆ Value for Money: Proposals from suppliers are evaluated based on a comprehensive assessment of capability, cost, risk, and sustainability, ensuring the best possible outcomes for the University.
- ◆ Integrity: All procurement activities are conducted with the highest standards of probity and ethical conduct, aligned with VU's policies and commitments.
- ◆ Ethical Model: VU is dedicated to ethical operations through the principle of Protecting Country, considering the social and environmental impacts of its supply chain decisions. This commitment focuses on:
 - *Modern Slavery Act 2018* (Cth): Ensuring ethical supply chain management to prevent modern slavery.
 - Supporting Local and Indigenous Businesses: Prioritising social enterprises in Victoria and Australian First Nations businesses.
 - Environmental Sustainability: Sourcing goods and services with a focus on minimising environmental impact.

- Diversity & Inclusion: Promoting the inclusion of LGBTQIA+, gender diversity, cultural diversity, and accessibility in procurement practices.
- Regional Sourcing: Preference is given to suppliers operating in the West of Melbourne, Victoria, and Australia.
- Health and Wellbeing: Supporting suppliers who align with VU's commitment to promoting health and wellbeing.

Range of goods and services sourced

As a large educational institution, VU sources a wide variety of goods and services, ensuring the highest standards of quality, cost-effectiveness, and ethical responsibility in every procurement decision.

Preferred supplier model

VU works with a selected group of preferred suppliers, managed primarily by Campus Services, Marketing, and Procurement. These suppliers are chosen through a competitive procurement process that aims to streamline the purchasing of commonly used items. This approach not only ensures value for money but also helps mitigate supply chain risks, including risks related to modern slavery.



Overview of VU's supply chain (cont.)

2024 Spend profile

Victoria University continues to prioritise the identification and management of modern slavery risks within its supply chain. As part of this commitment, a comprehensive analysis of the University's 2024 procurement transactions was undertaken using the ArcBlue Modern Slavery Risk Assessment Tool, developed by ArcBlue (a Bain & Company business).

This assessment tool draws on a range of authoritative data sources, including the 2024 Global Slavery Index, RESPECT (Responsible and Ethical Private Sector Coalition Against Trafficking), and the NSW Anti-Slavery Commissioner's guidance on reasonable steps for modern slavery risk mitigation. It enables risk evaluation across multiple dimensions—geographic regions, procurement categories, and individual suppliers.

In 2024, Victoria University (VU) had a total expenditure of \$211.5m, spread across 3,046 suppliers. Among these, 255 suppliers had expenditures exceeding \$100,000. Notably, the top 25 suppliers accounted for approximately 50% of the University's total spend.

In addition, credit card expenditures (excluded from the above total) amounted to \$3.6m, covering 13,331 transactions. The largest categorized spending groups – Catering, Accommodation, Conference Fees, and Transportation – account for 26% of total credit card spend. VU is continuing efforts to improve reporting on credit card transactions, as merchant data often fails to accurately identify supplier locations, and a significant portion of transactions involve suppliers that are not easily identifiable.

Table 1 provides a detailed breakdown of VU's expenditure across various categories (excluding credit card transactions).

Table 1: Spend by category

Row Labels	Proportion of Total Spend	Spend	Count of Suppliers
Corporate professional services	13.3%	\$28,047,471	396
Marketing & media	13.1%	\$27,667,713	265
Buildings & grounds	10.5%	\$22,191,573	116
Government	10.5%	\$22,183,628	7
IT software	10.1%	\$21,334,585	134
Property management	9.8%	\$20,713,272	16
Human resources	6.9%	\$14,493,797	86
Construction, refurbishment & works	5.9%	\$12,394,757	78
Student services	5.8%	\$12,268,479	1055
Utilities & renewables	2.0%	\$4,215,596	4
Library services	1.9%	\$3,942,791	55
Laboratories & research	1.9%	\$3,919,631	175
IT professional services	1.8%	\$3,862,190	24
Telecommunications	1.4%	\$2,960,143	8
Lecturer & teaching expenses	1.3%	\$2,689,960	285
IT hardware	1.2%	\$2,592,397	13
Travel & entertainment	0.6%	\$1,357,614	18
Office related supplies & services	0.6%	\$1,168,896	64
Audio visual	0.6%	\$1,164,031	8
Not Defined	0.5%	\$1,037,879	179
Plant & equipment	0.3%	\$672,356	42
Logistics & storage	0.3%	\$589,219	18
Grand Total	100%	\$211,467,979	3046

Overview of VU's supply chain (cont.)

Table 2 provides a summary of the top 10 countries by spend value and spend category.

Victoria University spend with international suppliers was \$12.37m or 5.8% of total university spend in 2024.

Table 2: International payments by country

Country	Spend	Companies	Spend Categories
Singapore	\$3,716,505	14	Business & management consulting services, Cloud services, Lecturers & honoriums, Other consulting services, Other Subscriptions, Periodicals journals & serials, Student recruitment – international, Training providers
United States of America	\$2,014,252	56	Electronic library supplies, Engineering equipment, Laboratory chemicals, Lecturers & honoriums, Marketing materials & promotional items, Other library stocks, Other memberships, Other office equipment, Other scientific equipment, Other Subscriptions, Other universities & educational institutions, Periodicals journals & serials, Software as a service (SAAS), Subscriptions to professional organisations, Support software, Teaching & research software, Teaching supplies & course materials, Thesis examination & marking services
Australia (see note)	\$1,557,157	9	Electronic library supplies, Lecturers & honoriums, Periodicals journals & serials, Student recruitment – international, Subscriptions to professional organisations, Support software, Teaching & research software
United Kingdom	\$693,342	54	Books & other printed materials, Conference fees, Electronic library supplies, Lecturers & honoriums, Marketing & communication services, Other library stocks, Research services, Software as a service (SAAS), Support software, Thesis examination & marking services
Netherlands	\$649,362	8	Lecturers & honoriums, Other memberships, Periodicals journals & serials, Student Refunds, Support software
India	\$477,592	35	Accommodation, Business & management consulting services, Conference fees, Lecturers & honoriums, Other consulting services, Other scientific equipment, Other universities & educational institutions, Research services, Student recruitment – international, Student Refunds, Support software
Hong Kong, Special Administrative Region of China	\$429,209	9	Electronic library supplies, Lecturers & honoriums, Student recruitment – international, Training providers
Germany	\$388,552	8	Lecturers & honoriums, Medical equipment, Other Subscriptions, Other universities & educational institutions, Student recruitment – international, Student Refunds, Support software
Vietnam	\$319,494	9	Student recruitment – international, Student Refunds
China	\$313,506	22	Business & management consulting services, Insurance premiums, Lecturers & honoriums, Other laboratory consumables, Other universities & educational institutions, Sample testing services, Student recruitment – international, Student Refunds, Thesis examination & marking services

Note: Payments to companies who are registered Australian businesses who invoice for goods/services in a foreign currency.

Risks identified in Victoria University's operations and supply chain

Victoria University’s (VU) supply chain includes both domestic and international suppliers across 135 unique spend categories in 2024. The identification of risks within the supply chain requires a comprehensive, multi-faceted analysis, considering the following key risk categories:

- ◆ Supplier Risk
- ◆ Supply Category Risk
- ◆ Country Risk

Findings from the 2024 analysis indicate that Victoria University engaged with 659 suppliers spanning 64 procurement categories considered to present a high risk of modern slavery. These risks are influenced by factors such as labour-intensive production processes, complex international supply networks, and a dependence on low-skilled labour in certain industries.

Table 3: High risk spend categories

Through supply chain mapping, VU identified the following high-risk categories for modern slavery within its operations. Each category was assessed to determine the level of risk, taking into account factors such as location, material sourcing, wages, and industry practices.

Category & Spend	Risk Type	Assessment of Risk
Software (\$21.33m)	Location of Spend	96% of software purchased in 2024 was sourced from Australian suppliers, with the top five purchases (TechnologyOne, Oracle, Microsoft, Salesforce, Adobe) totalling \$12.1m. VU considers domestic software procurement low risk. However, it acknowledges that some software may be resold through Australian resellers representing international companies. Further analysis on international software purchases is provided in Table 4.
Construction (\$12.39m)	Materials Manufacturing	VU recognizes the modern slavery risks in both raw materials and finished products used in construction projects. The tendering process includes a thorough assessment of contractors to ensure appropriate controls are in place to mitigate modern slavery risks. VU is also aligning with the Local Jobs First Act 2003, prioritizing local content before sourcing materials from international suppliers.
Temporary Labour (\$8.97m)	Wages and Conditions	Temporary labour is sourced through a contracted panel of recruitment firms operating in Australia. Non-panel firms must meet the same compliance requirements, including rate and fee transparency and registration with the Labour Hire Authority. Given these controls, the modern slavery risk in this category is considered low.
Contact Centre Services (\$2.74m)	Wages and Conditions	The contact centre previously operated by a third party was transitioned to an in-house service during 2024, now managed by VU with VU employees.
Commercial Cleaning (\$4.46m)	Wages and Conditions	The cleaning and security industries are recognized as high-risk sectors for modern slavery. VU's tender processes require contractors to demonstrate compliance with labour laws and the Modern Slavery Act. However, given the high-risk nature of the industry, VU will collaborate with industry in 2025 to explore ways to mitigate risks further.
Security (\$4.58m)	Wages and Conditions	VU acknowledges the risk associated with security services, particularly concerning wages and working conditions. As with cleaning services, VU's tender processes require contractors to meet modern slavery compliance standards. Additionally, further risk mitigation strategies are being explored in collaboration with external frameworks and organizations.

VU’s procurement practices aim to address modern slavery risks within its supply chain through comprehensive assessments and proactive strategies. The University remains committed to continuously monitoring these high-risk categories and taking necessary actions to reduce the impact of modern slavery across its operations and supply chain.

Risks identified in Victoria University’s operations and supply chain (cont.)

Analysis of country risk

The analysis of country risk has identified 152 suppliers classified as very high and high risk based on the location of their operations. These suppliers represent 1.4% of Victoria University’s total spend, with 19.5% of this spend related to International Student Recruitment.

Table 4: High risk international spend categories

Supply Categories	Total Supplier (\$ International)	Suppliers Rated High & Very High Risk (\$ International)	% of Total	Assessment of Risk
Software	\$1,773,416	\$1,773,416	100%	An assessment of software purchased from international suppliers evaluated supply chain risks associated with Software providers, particularly those operating in high risk countries. No suppliers from high risk countries were identified.
Student Recruitment (International)	\$2,457,225	\$596,257	24%	<p>VU maintains contracts with both domestic and international student recruitment agencies. While due diligence processes are in place to assess new agents, VU recognizes the opportunity to enhance these procedures further to minimize potential risks to students.</p> <p>International student recruitment is carried out through both Australian-based companies and international organisations, with a total spend of \$15.05 million. This underscores the importance of holding all international agents – regardless of their location – to high standards of compliance with modern slavery obligations. Strengthening contract clauses is the first step, with future plans requiring agents to participate in Modern Slavery Awareness training provided by VU.</p>

Modern slavery actions identified for 2024

(as stated in the 2023 Modern Slavery Statement)

Progress and completed actions during 2024

1. Policy and procedure development

Planned action:

Finalise procedures under the VU Modern Slavery Prevention Policy, including formalising the process for reporting incidents or concerns related to modern slavery in the university's supply chain.

Completed action:

- ◆ Modern Slavery Prevention Procedure was published.
- ◆ VU launched the Information for Suppliers web page, outlining how suppliers can report incidents or concerns: Information for Suppliers – [Victoria University](#)

2. Supplier Risk Assessments

Planned action:

Engage suppliers in high-risk categories to complete Supplier Assessment Questionnaires (SAQs), particularly in:

- ◆ Software (international suppliers)
- ◆ International student recruitment

Completed action:

- ◆ 130 individual suppliers assessed for modern slavery risks across 37 tender activities.
 - 120 suppliers were deemed compliant and evaluated as part of procurement processes.
- ◆ SAQs obtained directly from five suppliers in the following high-risk categories:
 - Cleaning
 - Printing & distribution (India)
 - IT resource (India)
 - Printing services
- ◆ Drafted Modern Slavery Risk Report in response to SAQ data.
- ◆ 15 additional SAQs collected through the AUPN pilot program for suppliers of medical supplies.

3. Spend data & supplier profile analysis

Planned action:

Enhance spend data analysis, including improved visibility of supplier profiles and credit card spend.

Completed action:

- ◆ Spend data for 2024 now includes credit card and international payments, improving overall supplier transparency and risk identification.

4. Modern slavery awareness training

Planned action:

Deliver twice-yearly awareness training for all university staff.

Completed action:

- ◆ Training delivered to 65 professional staff and 43 academic staff.
- ◆ Modern slavery content integrated into Finance for Managers Induction sessions.

5. Student-focused awareness initiatives

Planned action:

Expand training delivery to students, with a focus on their vulnerability to modern slavery risks.

Completed action:

- ◆ Customised Modern Slavery Awareness Training developed and delivered to 28 students as part of the Student Leadership Program.

Modern slavery actions identified for 2024 (cont.)

6. Supplier training initiatives

Planned action:
Deliver training sessions for suppliers to raise awareness of modern slavery risks in their industries.

- Completed action:**
- Training provided to 57 representatives from 40 suppliers.
 - Suppliers represented 28 different categories of procurement;
 - 18 were classified as high-risk
 - 10 were classified as low-risk

Modern slavery risk classifications (examples):

High risk categories
Agency Contractors, Alarms & Security, Cleaning, Construction, Desktops, Uniforms, Fire & Safety, Software Licensing, etc.

Low risk categories
Creative Design, Electrical Services, Media & Advertising, Photography, Vehicle Leasing, etc.

7. Education & sector engagement

- Completed action:**
- Procurement staff participated in national and international webinars on modern slavery including:
 - Be Slavery Free – Workplace Justice
 - The Freedom Hub
 - Modern Slavery Data & Risk Analysis

8. Supplier code of conduct

Planned action:
Develop and release the VU Supplier Code of Conduct.

- Completed action:**
- Code of Conduct drafted and is in the final stages of stakeholder review.

9. International student recruitment – agent oversight

Planned action:
Review agent evaluation processes to address risks such as deceptive recruitment, forced labour, and debt bondage.

- Completed action:**
- 160 education agents transitioned to updated agreements containing a Modern Slavery Clause (Clause 24).
 - Agents are required to:
 - Uphold high ethical standards
 - Avoid activities linked to human trafficking, slavery, or forced labour
 - Comply with the *Modern Slavery Act 2018* (Cth)
 - Agents also adhere to the Australian International Education & Training Agent Code of Ethics
 - Regular meetings held to review service agreements and ensure ongoing compliance.

10. Supplier commitment plans

- Other actions taken:**
- Introduced commitment plans for suppliers as part of tender processes, covering:
 - Environmental Sustainability
 - Diversity, Access & Inclusion
 - Social Procurement
 - Commitment plans are embedded in contracts and linked to ongoing supplier performance monitoring.

11. Sector collaboration & research

- Completed action:**
- Participated in the Migrant Justice Institute’s 2024 National Temporary Migrant Survey, focused on international student experiences.
 - Results expected mid-2025.



Sector collaboration

Australian Universities Procurement Network (AUPN) anti-modern slavery working group

Victoria University (VU) is an active member of the Australian Universities Procurement Network (AUPN) Anti-Modern Slavery Working Group. This sector-based initiative aims to enhance human rights transparency within university supply chains, reduce duplication of effort and costs across institutions, facilitate collaboration on shared risks, and support compliance with modern slavery reporting obligations.

Key initiatives and highlights – 2024

Engagement and knowledge sharing

The Working Group hosted 11 forums throughout 2024, featuring presentations and interactive discussions with suppliers, university representatives, industry

associations, and modern slavery organisations. Topics included:

- ◆ International student worker exploitation – Australian Red Cross
- ◆ Property sector risks and remediation – Property Council of Australia
- ◆ The circular economy and ethical sourcing – Supply Chain Sustainability School
- ◆ Managing modern slavery risk in procurement – University of Sydney Modern Slavery Unit
- ◆ Cleaning procurement and associated modern slavery risks
- ◆ Survivor stories and the real-life impact of modern slavery – The Freedom Hub
- ◆ Strengthening modern slavery statement planning – Unchained Solutions
- ◆ Responding to modern slavery in university settings – The Freedom Hub
- ◆ Ethical clothing procurement practices – Ethical Clothing Australia
- ◆ Micro-credentials and shared training opportunities – ACRATH’s “Education for Change” program

Collaborative data analysis

The sector continued its joint efforts in collecting and analysing supplier data across universities, enabling improved visibility of supply chain risks and shared learning opportunities.

Supplier remediation pilot

A pilot project involving five suppliers was launched to explore a collaborative approach to remediation planning. This initiative aims to address identified risks constructively and consistently across participating institutions.

Supplier engagement and risk review

Victoria University (VU) conducts quarterly or semi-annual business review meetings with preferred suppliers identified as either high-spend or high-risk in relation to Modern Slavery. These meetings provide a platform to review the supplier’s exposure to modern slavery risks and to discuss strategies for mitigation and continuous improvement.

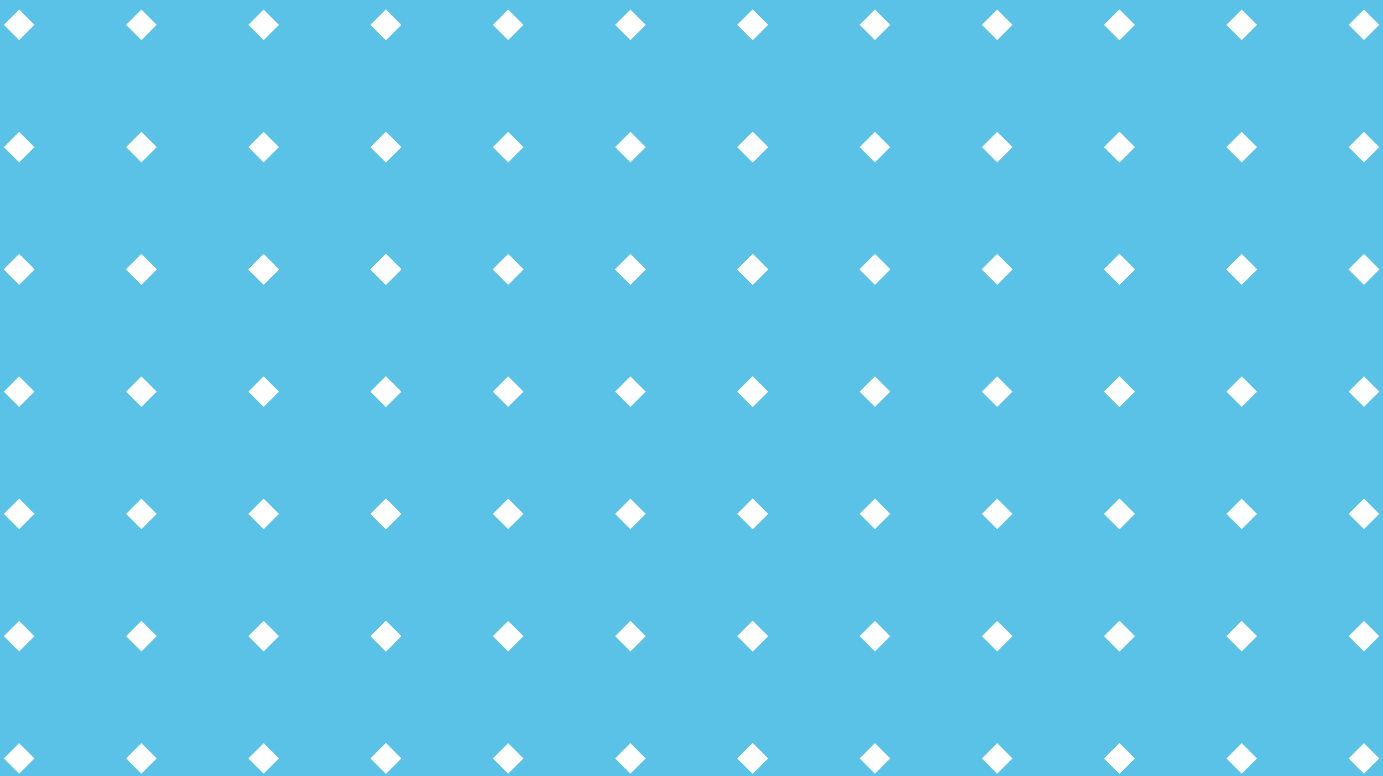
VU also supports smaller suppliers who may not fall under the reporting requirements of the *Modern Slavery Act 2018* (Cth). By sharing resources and guidance, VU enables these suppliers to align with the University’s ethical sourcing standards and contribute meaningfully to modern slavery risk management.

Proactive supplier collaboration – case studies

VU has established strong working relationships with key suppliers to promote ethical practices throughout the supply chain. Two recent examples of proactive and constructive engagement include:

- ◆ Fujifilm Business Innovation Australia Pty Ltd – VU’s provider of managed print services has implemented a robust vendor assessment framework, including modern slavery risk assessments, on-site audits, and ongoing monitoring of offshore suppliers.
- ◆ Reed Graduation Services Pty Ltd – As VU’s provider of graduation management services, Reed has taken significant steps to audit and assess both offshore and onshore suppliers, ensuring compliance with modern slavery standards and ethical sourcing practices.

These case studies demonstrate how VU’s collaborative approach fosters greater transparency and accountability across its supply chain while promoting responsible business conduct.



Supplier engagement and risk review (cont.)

Case study one



Title: Modern Slavery Assessment of a Vendor in a Developing Country

Fujifilm Business Innovation Australia Pty Ltd – Vendor assessment and onboarding case study

Fujifilm Business Innovation Australia Pty Ltd maintains a comprehensive and structured Vendor Assessment Framework. This framework incorporates multiple evaluation checklists designed to verify various aspects of vendor operations, including business credentials, financial viability, worker health and safety, data and information security, and modern slavery risks.

Assessment questionnaires are issued to both current and prospective vendors via the Ariba Procurement platform. The decision to onboard a vendor onto Fujifilm Business Innovation Australia's approved supplier list is informed by the outcomes of these assessments. Where potential or perceived risks are identified in a vendor's responses, further due diligence is initiated.

Case study: vendor assessment – Manila, Philippines (November 2024)

In November 2024, a vendor (name withheld for confidentiality) based in Manila, Philippines was shortlisted for the outsourcing of certain financial services roles at Fujifilm Business Innovation Australia Pty Ltd.

While initial verification of business credentials was completed through the first assessment checklist in Ariba, a site visit was deemed essential to validate on-the-ground conditions, particularly in the areas of:

- ◆ Work Health & Safety (WHS)
- ◆ Information Security Management Systems (ISMS)
- ◆ Modern Slavery risk mitigation

This was especially critical given the Philippines' ranking among the top 10 countries for the Asia Pacific region on the 2023 Global Slavery Index.

Vendors are required to complete additional assessments related to WHS, ISMS, and Modern Slavery through Fujifilm's third-party compliance service provider, OnCentrl.

Plan of action

1. Fujifilm Procurement representative scheduled and conducted a site visit meeting with management and employees.
2. Onsite evaluation report was compiled by the representative.
3. Final risk assessment conducted by the Fujifilm Procurement team.

Summary of key findings

- ◆ Health & Safety: Site inspections confirmed that employee working conditions aligned with WHS standards and supported the responses provided in the online WHS checklist.
- ◆ Information Security: A physical assessment of the site's data and information protocols was carried out. Key measures included restricted access zones, secure meeting rooms for Fujifilm staff, physical access card issuance, and robust surveillance systems.
- ◆ Training & Job Suitability: The vendor runs continuous, year-round training programs led by a dedicated excellence team. Training focuses on technical systems, tools, and compliance-related topics.
- ◆ Wages & Working Conditions: Individual staff interviews confirmed that wages were paid in accordance with Philippine government regulations, and that appropriate working conditions were being maintained.

Outcome

- ◆ A detailed report was prepared for each assessment area and submitted to the Fujifilm Procurement team.
- ◆ Findings were consistent with the vendor's online assessment responses.
- ◆ No significant risks were identified in relation to WHS, ISMS, or modern slavery practices. Minor improvements were recommended and communicated.
- ◆ Based on the overall assessment, the vendor was approved and successfully onboarded onto Fujifilm Business Innovation Australia's procurement platform.

Supplier engagement and risk review (cont.)

Case study two



At Reed Graduation Services Pty Ltd, we are firmly committed to ethical sourcing and responsible business practices. In 2019, our CEO led a visit to several offshore supplier factories, accompanied by the General Manager and Production Manager. This visit included a comprehensive audit to assess supplier compliance with our Modern Slavery policies and procedures.

The visit also served as an opportunity to strengthen supplier relationships and clearly communicate our expectations for maintaining ethical and responsible conduct throughout the supply chain.

Our commitment to supplier oversight remains ongoing. A follow-up audit covering both offshore and onshore suppliers is scheduled for 2026, again led by the CEO. This initiative will ensure continued

alignment with our ethical sourcing policies and reinforce accountability across the supply chain.

Our focus on ethical practices extends beyond offshore suppliers. Most recently, we collaborated with a local, onshore certificate frame supplier to conduct a detailed audit of their supply chain. This process included completion of a Modern Slavery Risk Assessment Questionnaire. As part of their response, the supplier undertook a review of their own glass and wood suppliers to verify compliance with required ethical sourcing standards.

The outcome of this assessment confirmed that the supplier meets Reed Graduation Services' expectations for ethical and responsible sourcing.



Responsible investments

Modern slavery statement – investment portfolio risk

VU's responsible investment philosophy and approach incorporates Environmental, Social and Governance (ESG) considerations into management of its investment funds. The University works with an asset consultant (Russell Investments) to set parameters on the ESG impacts of its investments and to assist the University in finding suitable investment products that best match the University's ESG parameters.

As at 31 December 2024, one hundred per cent of the equity component of our funds are invested in two responsible investment products:

- ◆ Russell Investments Sustainable Global Shares ex Fossil Fuels Fund: a fund that invests in a broad range of global shares, with a 62% reduced exposure to carbon emissions compared to the MSCI ACWI ex Australia Index.
- ◆ Russell Investments Australian Responsible Investment ETF (RARI): a fund that invests in Australian shares and trusts listed on the ASX that also excludes companies with fossil fuel reserves.

Both of these funds continue to exhibit a lower level of ESG risk relative to their benchmarks, as measured by a weighted average Sustainalytics score. Both of these funds also have a significantly lower carbon footprint than benchmark.

As at 31 December 2024:

- ◆ The RARI portfolio exhibited carbon intensity of 64.9 tonnes CO₂ per \$1m revenue (USD) compared to the benchmark's 146.3 tonnes.
- ◆ The Global Shares ex Fossil Fuels portfolio exhibited carbon intensity of 42.5 tonnes CO₂ per \$1m revenue (USD) compared to the benchmark's 113.4 tonnes.

The index which the ETF tracks is weighted to companies that exhibit positive ESG characteristics. This is determined using

Russell Investments' proprietary Material ESG Scores, which are based on issues financially material to a company's business. These issues are identified using the industry-level materiality map developed by the Sustainability Accounting Standards Board (SASB), relevant to each company.

The index also screens against companies that have a material involvement in the manufacture and distribution of alcohol, tobacco, gambling, pornography and armaments; mining thermal coal (extraction) or coal power generation; and oil and gas exploration, power generation, production, refining, transportation and/or storage

In 2023, Russell Investments was assessed by the United Nations-supported Principles for Responsible Investment (PRI). Russell Investments has been a signatory of this annual initiative since 2009. These principles assess a firm on its incorporation of ESG issues in the investment decision making process along with its ability to promote their acceptance, effectiveness and reporting. Russell Investments is committed to embedding the PRI's best practices and evidenced by above median scores in all tested categories, including a 'five star' rating for Policy Governance & Strategy.

Russell Investments has also been a signatory of the Investors Against Slavery and Trafficking Asia Pacific (IAST APAC) group since December 2022.

It is an investor-led, multi-stakeholder project that was established to engage with companies in the region to promote effective action in finding, fixing and preventing modern slavery in operations and supply chains. As of June 2024, IAST APAC comprises 49 investor members with AU\$12 trillion in Assets Under Management (AUM), together with the Australian Council of Superannuation Investors (ACSI), Walk Free and the Finance Against Slavery and Trafficking (FAST) initiative. Walk Free and FAST support IAST APAC as knowledge partners with financial sector and modern slavery subject expertise.

Planned actions

Over the next 12 months, VU will undertake the following actions to strengthen its commitment to preventing modern slavery and effectively managing associated risks:

VU policies & procedures

- ◆ Develop and include Modern Slavery Commitment Plans in tender documentation, enabling suppliers to outline specific actions and commitments in alignment with VU's modern slavery obligations.
- ◆ Finalise and publish the Supplier Code of Conduct (drafted in 2024), incorporating key obligations under the Modern Slavery Act for all suppliers.

Supplier engagement & assessment

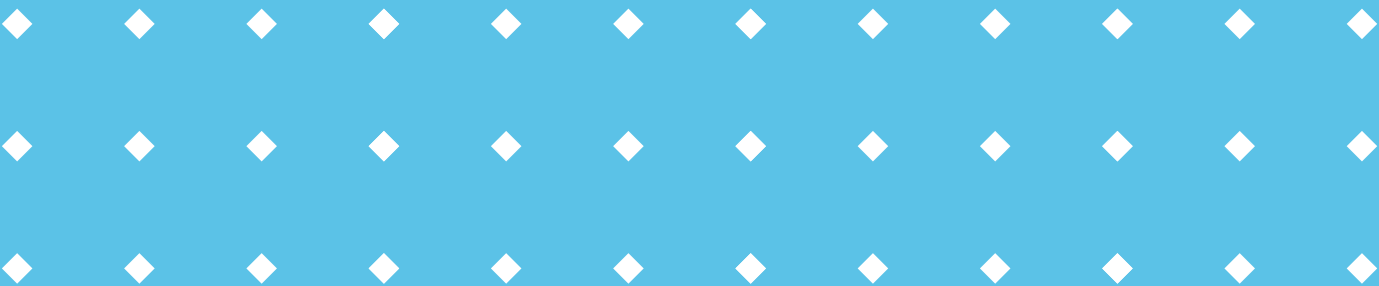
- ◆ Engage with suppliers across identified high-risk categories to complete Supplier Assessment Questionnaires, including:
 - Software Licences
 - Cleaning Services
 - Security Services
 - Agency Contractors & Temporary Workers
- ◆ Suppliers identified as having a high overall risk of modern slavery will be required to submit a formal commitment plan.
- ◆ Review and update the International Education Assessment Form to include specific references to modern slavery risks in the recruitment checklist for international student agents.
- ◆ Participate in the Electronics Watch pilot program, promoting worker-driven, independent monitoring of modern slavery risks in ICT supply chains.

Continuous improvement in spend data analysis

- ◆ Implement a third-party spend analytics solution to enhance reporting accuracy and improve tracking of spend by category, supporting better risk identification and mitigation.

Training & awareness

- ◆ Continue delivering Modern Slavery Awareness Training for staff across all departments.
- ◆ Integrate Modern Slavery Awareness Training into the 2025 University Career Conversations: Learning and Development Program.
- ◆ Maintain ongoing training programs for:
 - Students
 - Manager Essentials [Finance for Managers]
 - Suppliers, with emphasis on onboarding new suppliers
- ◆ Expand Modern Slavery Awareness Training to International Student Recruitment Agents.



Effectiveness of actions

VU considers that the actions it has taken to date in addressing modern slavery risk demonstrate its commitment to the prevention of modern slavery, but acknowledges that there is more work to be done. Further actions (as outlined) will be important to continue to minimise risks of exploitation in our operations and supply chains.

Consultation and additional information

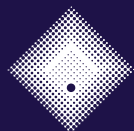
VU Online have been consulted, and have identified no modern slavery risks in their operations or supply chain.

The Victoria University Modern Slavery Statement is endorsed by the Victoria University Council and signed by Professor Adam Shoemaker, Vice Chancellor.

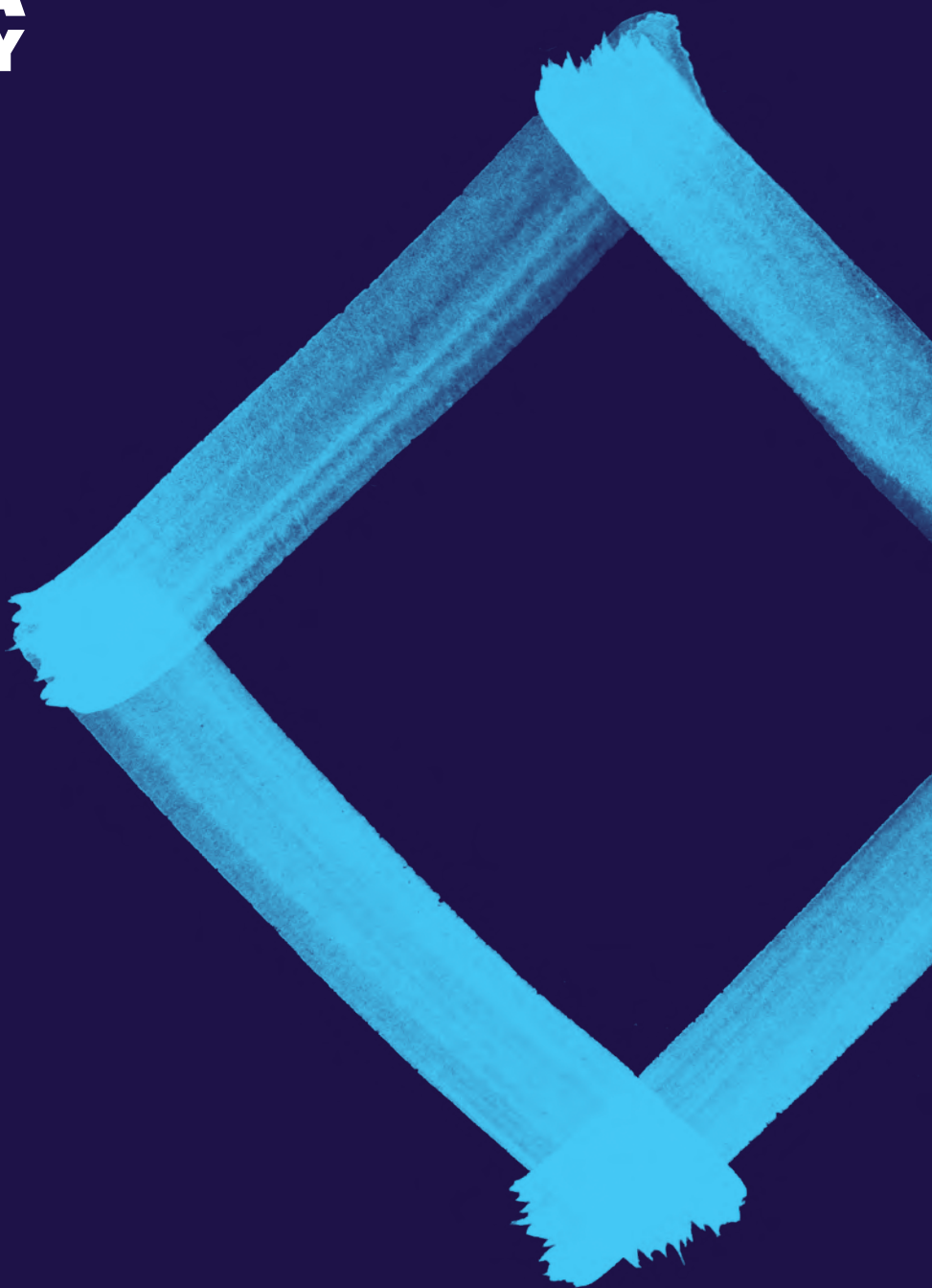


Approved by Professor Adam Shoemaker,
Vice-Chancellor of Victoria University





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