



**Modern Slavery
Statement**

2023



Acknowledgement of Country

Griffith University acknowledges the people who are the traditional custodians of the land and pays respect to the Elders, past and present, and extends that respect to all Aboriginal and Torres Straits Islander peoples.

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Message from the Vice Chancellor

In this 2023 Modern Slavery Statement, Griffith University reaffirms its enduring commitment to addressing and eradicating modern slavery. This year has been pivotal, marked by a global surge in regulatory efforts to tackle emerging issues related to modern slavery. Such developments are crucial in shaping our approach and strategies in this ongoing battle.

Australia witnessed the first review of the Modern Slavery Act 2018 since its inception three years ago on 1 January 2019. The review was tabled on 25 May 2023 and contained 30 recommendations to strengthen modern slavery obligations for reporting entities.

In line with these changes—and building upon our past initiatives—Griffith University has made notable advancements. A key milestone was the development of the Griffith Modern Slavery Maturity Model. Rooted in the United Nations Guiding Principles on Business and Human Rights (UNGPs), this model was collaboratively developed with input from our strategic partners. It served as an essential tool for assessing the maturity level of our approach to modern slavery, helping us set and achieve targeted objectives over a three-year period. The model ensures that we not only identify and bridge gaps but also enhance our strengths, with progress monitored through strategically designed Key Performance Indicators (KPIs).

Our focus areas in 2023 have been diverse and far-reaching. We have endeavoured to build and enhance the capabilities of our staff, students and external stakeholders, including suppliers and industry peers. We refined our supplier due diligence processes and strengthened our governance systems. Moreover, we have placed a strong emphasis on interdisciplinary collaborations, ensuring that considerations of modern slavery are progressively embedded across relevant activities.

Collaboration has been a cornerstone of our approach—particularly our engagement with peers and civil society organisations. This collaboration enables us to stay informed about emerging trends, fosters creativity and helps us leverage resources more effectively, thereby enhancing our collective ability to advance human rights.

While we are proud of the progress made, we recognise that the journey is ongoing. Human rights challenges are dynamic, necessitating constant vigilance and adaptability. Guided by our values of excellence, engagement and ethical behaviour, Griffith University remains committed to creating a just and brighter future for all.

Introduction and progress

Griffith University's vision is to transform lives and add to human knowledge and understanding in a way that creates a future that benefits all.

This is Griffith's fourth Modern Slavery Statement pursuant to its obligations under Section 13 of the *Modern Slavery Act 2018* (Cth) (the Act).

Modern slavery, as defined by the Act, describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.

Examples of practices constituting modern slavery include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage
- the worst forms of child labour.

Griffith's stance against all forms of exploitation is aligned with the United Nations Sustainable Development Goals (SDGs), particularly Goal 8, which focuses on promoting sustained, inclusive and sustainable economic growth, full and productive employment, and decent work for all.

Griffith also supports Goal 12, as it is committed to upholding public procurement practices that are sustainable and in accordance with national policies and priorities.

Furthermore, the University's commitment extends to Goal 16, aiming to promote peaceful and inclusive societies for sustainable development, provide access to justice for all, and build effective, accountable and inclusive institutions at all levels.

Griffith reports publicly against all 17 goals in its annual Sustainability Report, showcasing the University's comprehensive approach to sustainability and social justice.



Progress in 2023

In the 2022 Statement, Griffith committed to developing a three-year Modern Slavery Action Plan, complete with specific KPIs to track progress toward its goals. Going beyond the initial promise, Griffith has achieved an important milestone. With valuable contributions from its strategic partners, the Mekong Club and Electronics Watch, Griffith has formulated the Modern Slavery Maturity Model, which in turn informed the three-year Action Plan. This model aligns with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and has been instrumental in a) assessing Griffith's maturity

level at the beginning of 2023, b) defining aspirations for the next three years and beyond, and c) monitoring the progress and maturity journey over time.

The table on the right offers a snapshot of the key progress Griffith made in 2023, in alignment with the Operational Principles for Corporate Responsibility contained in the UNGPs. For more details, please refer to section entitled Griffith's actions to assess and address the risks identified.

POLICY COMMITMENT

Policy review: A review of all existing policies requiring modern slavery references was initiated by the University, with ongoing appropriate adjustments being continually made.

DUE DILIGENCE

Active participation in multi-stakeholder initiatives: Griffith has enhanced risk identification and collaboration through partnerships with the Australasian Universities Procurement Network (AUPN), Electronics Watch, the Mekong Club and the Cleaning Accountability Framework (CAF). Activities include leading AUPN's Risk Identification Working Group, participating in the Mekong Club's Supply-Chain Group, tracking hardware supply chains with Electronics Watch, and engaging with CAF for trend analysis and capability building within the cleaning category.

Supplier capability development: A Handbook and Guidelines for Suppliers have been created to support adherence to Griffith's Supplier Assessment and Risk Management process, supplemented by consultations with the Mekong Club and ad-hoc supplier education sessions.

Staff capability building: The University piloted a modern slavery training module and conducted four sessions for internal stakeholders. Combining internal expertise and external speakers, these sessions enhanced staff awareness and response to modern slavery issues.

Risk assessment and management: The integration of the Modern Slavery Supplier Assessment and Risk Management steps into the procurement process, through the Informed 365 tool, led to a 160 per cent increase in supplier assessments during the sourcing event process in 2023. This process now features a revised Self-Assessment Questionnaire, which includes risks such as overseas recruitment and sham contracting, and incorporates Griffith's Supplier Code of Conduct.

Deep-dive risk assessment: The University actively participated in Electronics Watch's Supplier Working Group to promote transparency in its Information and Communication Technology (ICT) supply chain.

On-site supply chain assessments: Targeted on-site assessments at construction sites ensured strategic placement of grievance posters for contractors and workers across Griffith's campuses, and facilitated discussions on modern slavery with contractors.

Student awareness initiatives: The objective of raising awareness among students was twofold: a) to inform Griffith's future leaders about the issue, and b) to make them aware of their own vulnerability. Particular focus was placed on emerging scams in human trafficking that targeted international students. This awareness was achieved in different ways including webinars, a tailored modern slavery module in the MBA program and the Employee Relations program, internships, work placements, informative content in the student newsletter and myGriffith webpage.

REMIEDIATION

Access to remedy: Griffith activated a modern slavery grievance mechanism through the Your Call whistleblowing hotline. Calls are actively monitored.

ISSUE OF CONTEXT

Compliance: Griffith adhered to all relevant laws and maintained internationally recognised human rights standards within its Australian operations. Simultaneously, it engaged with strategic partners to stay informed about emerging issues that could impact its supply chain, enabling prompt and effective action.

GOVERNANCE

Implementation of monitoring tools: The University developed the Modern Slavery Maturity Model and a three-year Action Plan to enhance the effectiveness of its anti-slavery measures.

Strategic advisory through the Anti-Slavery Task Force¹: The Executive-led Anti-Slavery Task Force, key to the Action Plan's implementation, met three times in 2023.

Stakeholder engagement: Griffith shared its modern slavery journey as a guest speaker at the Queensland Government Procurement and Contract Management Community of Practice and at international forums, including the Electronics Watch Summit.

Promotion of zero tolerance in recruitment: Griffith's commitment to zero tolerance towards modern slavery is now prominently included in job advertisements.

¹The University established a Modern Slavery Task Force, aimed at addressing modern slavery risks and to enable a forward-thinking approach that aligned with the Modern Slavery Act 2018 and the University's commitment to social justice. The Task Force has representation of key senior staff who have accountability to effect change with regards to policy, strategy, stakeholder engagement, capability building and communication to advance the University's human rights objectives within our operations and supply chains

CRITERION 1

The reporting entity

This statement is made on behalf of Griffith University and its non-operational subsidiary International Water Centre Pty Ltd. Griffith University (ABN 78 106 094 461) is a statutory body established under the *Griffith University Act 1998 (Qld)*. Its principal office is at Parklands Drive, Southport QLD 4222.

In the 2023 reporting period, Griffith University's consolidated revenue was A\$1.09 billion. It therefore qualifies as a reporting entity under the Act. Griffith University has no subsidiaries or joint ventures that meet the requirements to be a reporting entity in its own right.

CRITERION 2

The University's structure, operations and supply chains

Structure

Griffith University's governing body is the University Council, with two of its members elected as Chancellor and Deputy Chancellor. Council must appoint a Vice Chancellor who is the Chief Executive Officer of the University. Griffith's Council has delegated some of its powers to the Vice Chancellor, to various committees and to appropriately qualified Council members or staff members other than the Vice Chancellor.

Griffith University is organised into four academic groups (groups). Groups in turn are organised by schools or departments, research institutes and research centres. The four groups are:

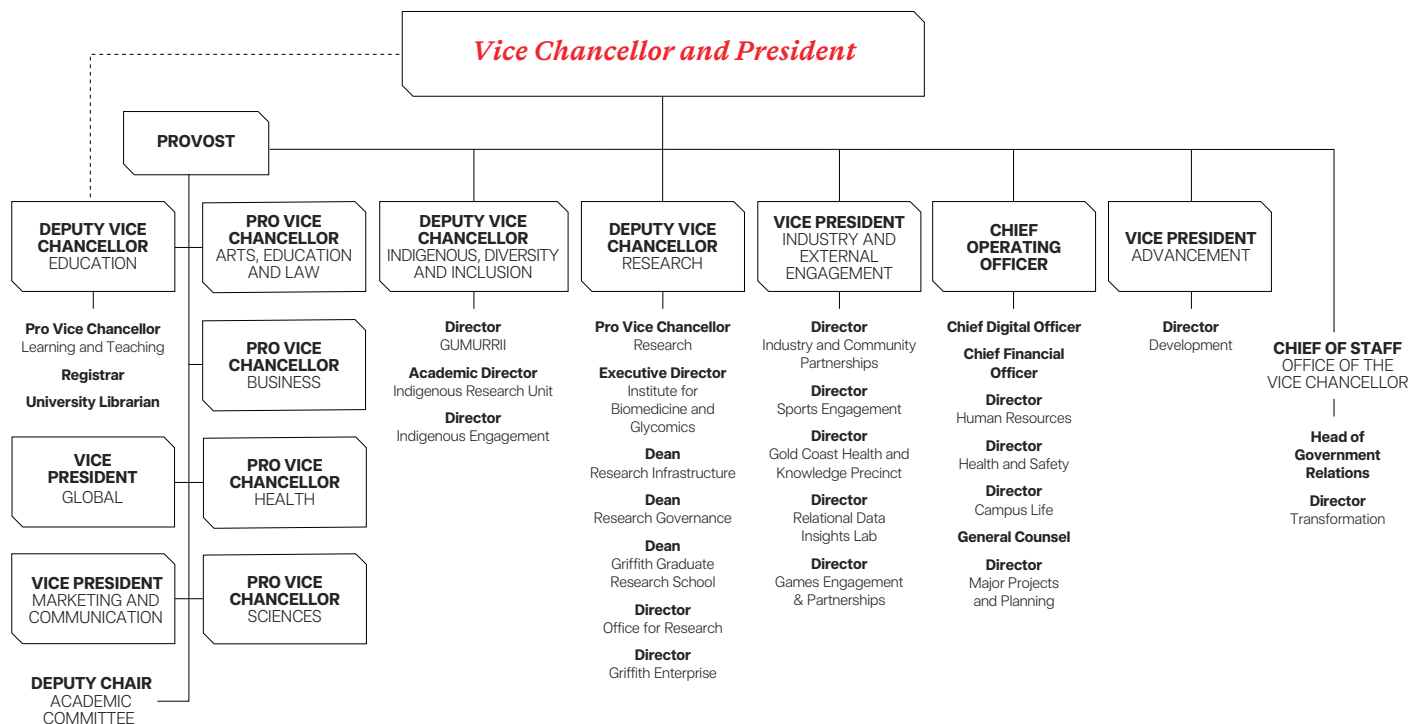
- Arts, Education and Law
- Griffith Business School
- Griffith Health
- Griffith Sciences

Griffith University also has an array of administration services that support the University's staff and students, as well as Griffith's research, teaching and learning.

Griffith University's organisational structure is shown on the right, followed by each academic group's organisational makeup.

Griffith University aims to practise good corporate governance, by adhering to the *Griffith University Act* and governance requirements of other relevant legislation. Griffith University also complies with the Universities Australia and University Chancellors Council Voluntary Code of Best Practice for the Governance of Australian Public Universities (amended May 2018). To learn more about Griffith University's corporate governance, please refer to our [Corporate website](#).





	ARTS, EDUCATION AND LAW	GRIFFITH BUSINESS SCHOOL	GRIFFITH HEALTH	GRIFFITH SCIENCES
Senior Officers	<ul style="list-style-type: none"> Office of the PVC (AEL) Dean (Academic) Dean (Research) Dean (Learning and Teaching) 	<ul style="list-style-type: none"> Office of the PVC (Business) Dean (Academic) Dean (Research) Dean (Learning and Teaching) Dean (Engagement) Director (International) Communications and Group Services Departments 	<ul style="list-style-type: none"> Office of the PVC (Griffith Health) Dean (Academic) Dean (Learning and Teaching) Dean (Research) 	<ul style="list-style-type: none"> Office of the PVC (Griffith Sciences) Dean (Academic) Dean (Learning and Teaching) Dean (Research)
Schools	<ul style="list-style-type: none"> Queensland College of Art and Design Queensland Conservatorium Griffith University Griffith Film School School of Criminology and Criminal Justice School of Humanities, Languages and Social Science School of Education and Professional Studies Griffith Law School 	<ul style="list-style-type: none"> Department of Accounting, Finance & Economics Department of Business Strategy and Innovation Department of Tourism, Sport and Hotel Management Department of Employment Relations and Human Resources Department of Marketing School of Government and International Relations Research Centres 	<ul style="list-style-type: none"> School of Medicine and Dentistry School of Pharmacy and Medical Sciences School of Nursing and Midwifery School of Applied Psychology School of Health Sciences and Social Work 	<ul style="list-style-type: none"> School of Engineering and Built Environment School of Information and Communication Technology School of Environment and Science
Research Centres	<ul style="list-style-type: none"> Creative Arts Research Institute Griffith Criminology Institute Griffith Centre for Social and Cultural Research Griffith Institute for Educational Research Law Futures Centre Autism Centre of Excellence 	<ul style="list-style-type: none"> Griffith Asia Institute Centre for Governance and Public Policy Griffith Institute for Tourism Centre for Work, Organisation and Wellbeing 	<ul style="list-style-type: none"> Menzies Health Institute Queensland Centre for Mental Health Australian Institute for Suicide Research 	<ul style="list-style-type: none"> Institute for Integrated and Intelligent Systems Queensland Micro- and Nanotechnology Centre Griffith Institute for Drug Discovery Centre for Planetary Health and Food Security Centre for Catalysis and Clean Energy Australian Rivers Institute Centre for Quantum Dynamics Cities Research Institute Coastal and Marine Research Centre Australian Research Centre for Human Evolution
Other	<ul style="list-style-type: none"> Griffith University Art Museum MATE Bystander Open Conservatorium QCAD Galleries Griffith Review 	<ul style="list-style-type: none"> Social Marketing Centre for Personal Finance and Superannuation Griffith Centre for Systems Innovation Policy Innovation Hub Centre for Applied Energy Economics and Policy 	<ul style="list-style-type: none"> Griffith Health Clinics Clinical Trial Unit Health Technical Services 	<ul style="list-style-type: none"> Griffith Sciences Partnerships Office Griffith Sciences Services Griffith Climate Change Response Program Griffith University EcoCentre

Figure 1: Griffith's organisational makeup

Operations

Griffith's operations are geared toward offering high-quality learning, research and social outcomes for students and researchers, with a focus on practices that have a positive social, economic and environmental impact on Griffith communities.

Griffith also provides members of its community and other third parties with other services such as day care and health clinics.

Griffith University is a world-class university:



**Ranked in
the top 2%**

of universities globally



**300,000+
alumni**

across 130+ nationalities



**46,000
students**

encompassing
134 different citizenships



**5
campuses**



4,240 staff

across administrative
and academic staff



**200+
degrees**



Extensive network of
**research centres
and institutes**

Study areas

Griffith offers its students tertiary degrees grouped into 10 study areas:



**Architecture, construction
and planning**



Business and government



Criminology and law



Education



Engineering, IT and aviation



**Humanities, languages
and social science**



Medicine, dentistry and health



Music and performing arts



Science and environment



Visual and creative arts

Locations

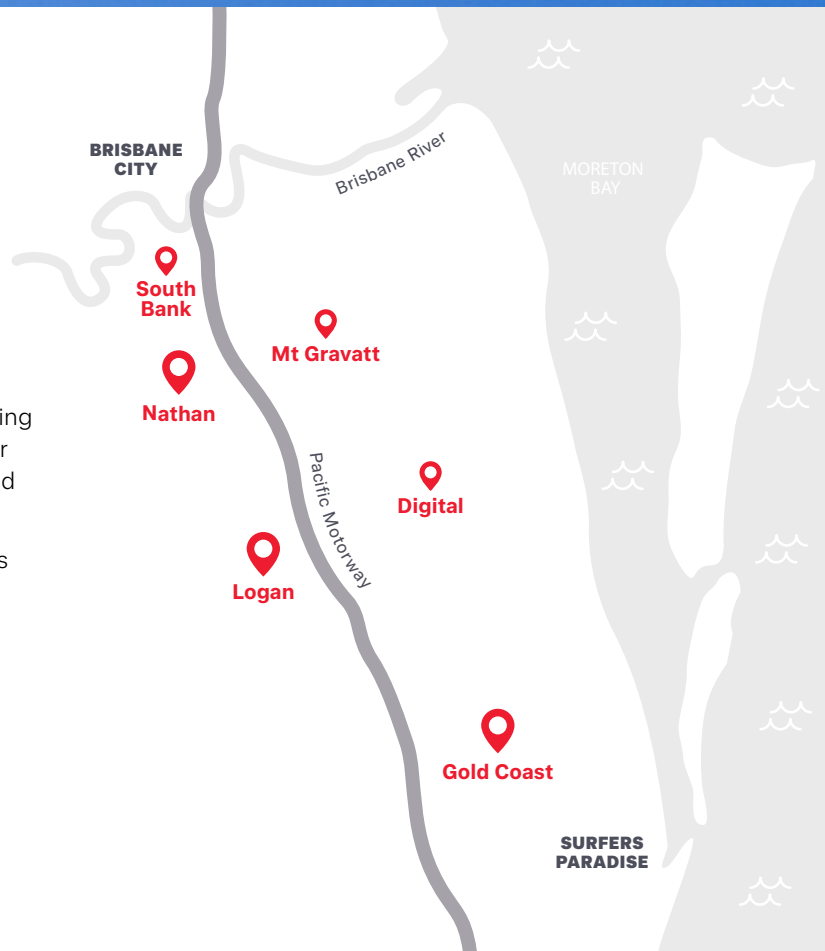
Griffith University operates its teaching and research primarily from five physical campuses located at:

- **Nathan, Brisbane, Qld**
- **South Bank, Brisbane, Qld**
- **Mt Gravatt, Brisbane, Qld**
- **Meadowbrook, Logan, Qld**
- **Southport, Gold Coast, Qld**

Additionally, with more than 20 years' experience teaching online, we have reinforced our commitment to giving our students the flexibility and support they need to succeed in their studies with a thriving Digital campus.

The University has no solely owned facilities or locations based internationally.

Griffith University leases property to retail tenants on its campuses who provide food and retail services.



Supply chain

The scope of Griffith's procurement encompasses a diverse range of goods and services that includes research equipment, building and construction, information and communications technology, and business services.

In 2023, Griffith University continued its procurement strategies from 2022 to enhance its research and teaching capabilities. Adopting the AUPN taxonomy, Griffith's spend structure is categorised into four Level 1 categories and three levels of subcategories. This continued from 2022 into 2023, ensuring the stability and efficiency of the procurement processes were upheld.

During the 2023 reporting period, Griffith's procurement spend exceeded \$375 million. Griffith's transactions involved more than 3,150 suppliers across 69 countries. Of these, 2,355 suppliers were based in Australia, accounting for approximately 90.56% of the total spend. This marked a 2.8% increase compared to the previous year. Suppliers from Europe and Asia accounted for 3.68% and 2.59% of the spend respectively, up 2%. Other locations, including American and African countries made up the remaining 3.17% of the procurement spend.

In 2023, Griffith's procurement spend increased by 36% compared to the previous year. This significant increase was driven by major investments in property and campus facilities, which included construction, cleaning and electrical services. Additional investments in business services also contributed to this rise in this category. Finally, a notable portion of the increase was allocated to technology improvements—particularly the comprehensive update of the campus network services, highlighting the focus on advancing Griffith's technological capabilities.

In 2023, Griffith's approach to supplier engagement remained consistent with the practices of 2022. The University continued to use various transaction methods to maintain its flexibility and uphold the principles of transparency, fairness and accountability. Griffith's Procurement and Supply Policy and Supplier Code of Conduct were both updated to better align with the United Nations Sustainable Development Goals and to solidify Griffith's commitment to ethical procurement practices. By upholding these principles, Griffith strives to make a positive societal change, ensuring a more sustainable future for all.

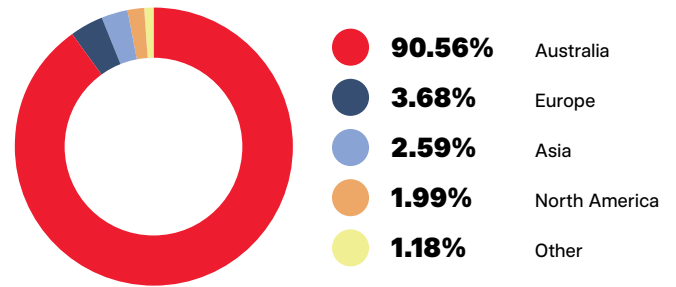


Chart 1: Griffith's Tier 1 suppliers spend locations

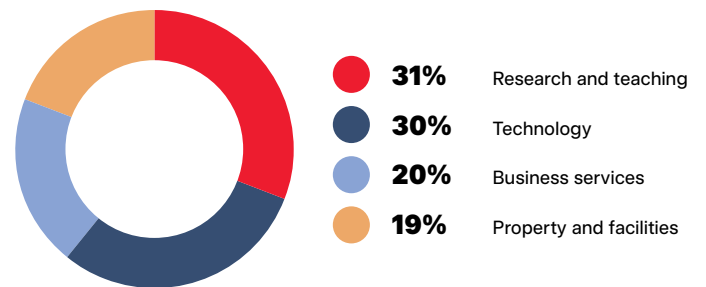


Chart 2: Griffith's spend per AUPN taxonomy, Level 1



CRITERION 3

The risks of modern slavery in our operations and supply chains

Griffith's approach to risk

Griffith undertook a thorough review of the Modern Slavery Supplier Assessment and Risk Management process developed in 2022 (illustrated in chart 4, page 13) and continued to assess new risks associated with existing and new suppliers, operating in those high-risk categories. This approach was instrumental in maintaining a focused approach on critical issues and enhancing the risk management process over time.

Identification of inherent risks

The assessment focused on identifying four key risk factors: a) vulnerable populations, b) business models, c) sectors, and d) geographies, across the spend categories. The following data sources were used to assess the risk in Griffith's supply chains:

- the [2023 Global Slavery Index](#) by the Walk Free Foundation
- the [2023 Trafficking in Persons Report](#) by the US Department of State
- [From Fake Job Ads to Human Trafficking](#) by the Mekong Club
- [Remediating Modern Slavery in Property and Construction: A Practical Guide for Effective Human Rights](#) by Property Australia.

Further insights were gained through regular interactions with strategic partners such as the Mekong Club, Electronics Watch, CAF, AUPN, and various internal groups including Griffith International, Student Life, Strategic Procurement and Supply, and Campus Life.

Assessment of inherent risks

To evaluate the inherent risks within the identified high-risk spend categories, Griffith used a modern slavery questionnaire, distributed via the Informed 365 Platform. This assessment was aimed at enhancing Griffith's understanding of the processes, systems and mechanisms companies employ to identify, address and account for modern slavery risks in their operations and supply chains. It was administered to both existing suppliers and organisations participating in sourcing events. The insights gained were pivotal in creating risk profiles for each supplier, spanning from very low to very high risk. These profiles became a key criterion of the supplier selection process, facilitating a more informed and ethically grounded procurement strategy.

Furthermore, risks were monitored through consistent oversight of the grievance mechanisms established in 2022 for contractors working on campus, along with the scrutiny of external media reports.

There were no reported cases of modern slavery in Griffith's operations and supply chains during this period.

- 1. Identification of inherent risks to people**
- 2. Risk prioritisation**
- 3. Assessment of residual risks to people using the modern slavery questionnaire for suppliers on the Informed 365 platform.**
- 4. Continuous improvement and capability building of internal and external stakeholders.**
- 5. Ongoing collaboration with internal and external stakeholders, monitoring and reporting.**

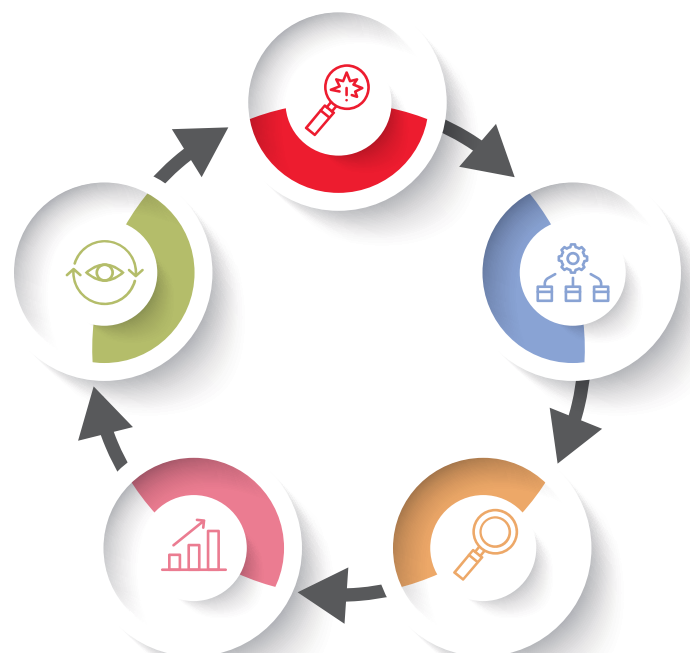


Figure 2: Griffith's Modern Slavery Supplier Assessment and Risk Management Procedure

Risks in Griffith's operations and supply chains

In 2023, Griffith's focus was on identifying and assessing the residual risks associated with organisations participating in sourcing events within spend categories identified as having a high risk of modern slavery. These categories comprised of property and facilities (encompassing construction, cleaning and electrical services), electronics (ICT hardware and services), and business services (specifically recruitment agencies for professional, executive, and academic staff).

In 2023 Griffith assessed 148 companies, using self-assessment questionnaires via the Informed 365 platform. This was 89 more assessments than the 59 companies assessed in 2022.

At the same time, Griffith continued to assess existing suppliers, including those offering goods across various spend categories through Griffith's Marketplace.

Griffith's suppliers were assessed using the Informed 365 Supplier Risk Index to establish the overall risk profile. As illustrated in Chart 5, there were no suppliers in the Very High risk rating. Less than 1% were High risk and over 70% in the Low and Very Low risk. This indicates that many organisations potentially exposed to high risks have established effective systems to manage and mitigate such risks in their operations and supply chains.

Interestingly from Griffith's data, there appears to be a positive correlation between the obligation to report under the Modern Slavery Act and lower risk levels, suggesting that statutory reporting can drive better risk practices.

Further collaboration to encourage the ongoing enhancement of supplier risk management capabilities is required with the 17% of suppliers in the Medium risk category.

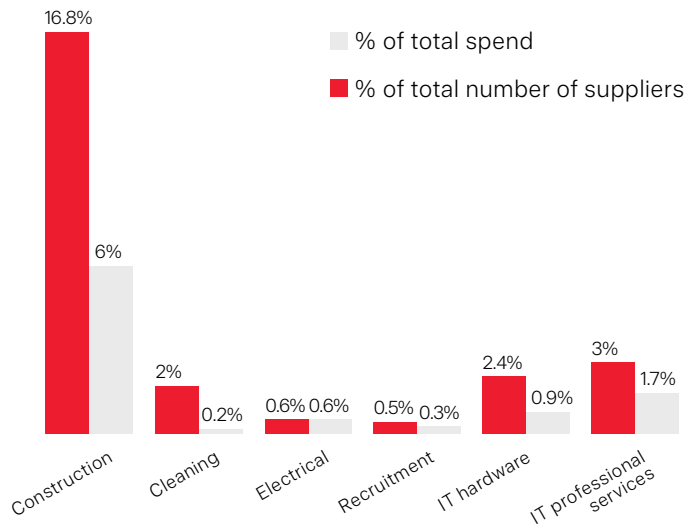


Chart 4: High-risk categories % of spend and suppliers



Chart 3: Number of suppliers assessed in 2022 and 2023

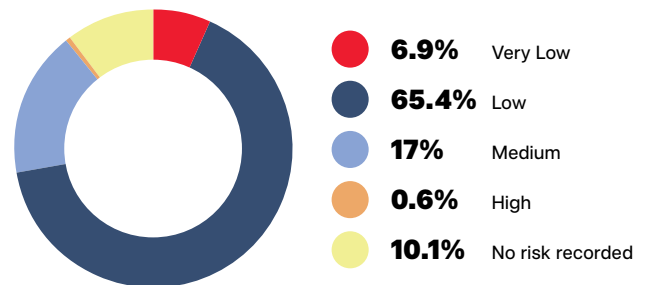


Chart 5: Overview of Informed 365 Supplier Risk Index for all suppliers assessed

Sourcing events in high-risk categories

The following section provides some insights into Griffiths sourcing events within high-risk categories during 2023 and the breakdown of the risk assessments. After the sourcing events, Griffith will continue to follow our approach to encourage our suppliers with Medium to Very High risk ratings to improve their modern slavery practices. This will be done using Improvement Plans and Griffith's Contract Management processes.

CONSTRUCTION

Category overview

% of total spend: 16.8%

% of total number of suppliers: 6%

Griffith University's extensive construction and development projects across its campuses carry potential modern slavery risks. As the University advances with the redevelopment of the Nathan Sciences precinct, new building developments, the closure of the Mount Gravatt campus, and the modifications to the Logan and Gold Coast campuses, the increased construction activity will increase the University's exposure to risks inherent within the construction sector. In the Australian context, the sector's reliance on subcontracting and informal labour arrangements exposes vulnerable populations (such as migrant workers) to the risk of exploitation and poor working conditions. Workers—especially those from overseas—may find themselves in situations of debt bondage, compelled to work to repay excessive recruitment fees.

In 2023, for most of the construction projects, Griffith continued to rely on panels of suppliers who were assessed for modern slavery risks in 2022. In 2024 Griffith will re-assess the panel and actively encourage the suppliers with Medium to Very High risk ratings to improve their modern slavery practices by issuing an Improvement Plan tailored to each supplier. This Improvement Plan will be managed as a critical part of Griffith's Contract Management process.

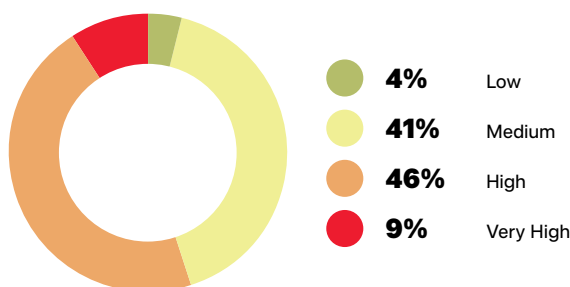


Chart 6: Overview Modern Slavery Survey risk profile of companies in the construction panel and N82 panel

One concern identified in this process was the sourcing of construction materials from outside Australia and New Zealand. This poses a potential risk, as it involves supply chains that might operate under less stringent labour laws and oversight, thereby increasing the likelihood of modern slavery practices. Additionally, issues related to subcontracting add to this complexity, as they can lead to reduced control and transparency over working conditions.

In response to these challenges, most of the companies assessed have implemented modern slavery management systems, demonstrating a proactive approach to mitigating these risks in the global supply chain. Griffith will continue to actively encourage the appointed suppliers to improve their modern slavery practices by issuing an Improvement Plan tailored to each supplier. The Improvement Plan will be managed as a critical part of Griffith's Contract Management process.

Griffith conducted internal site inspections at its Nathan, Logan and Gold Coast campuses in 2023 to ensure the modern slavery grievance posters were strategically placed in prominent places around the campuses.

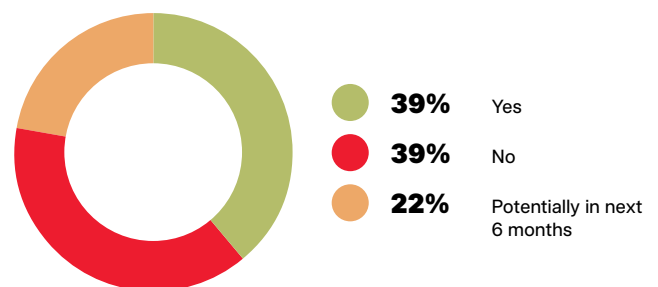


Chart 7: Construction companies procuring outside Australia and New Zealand

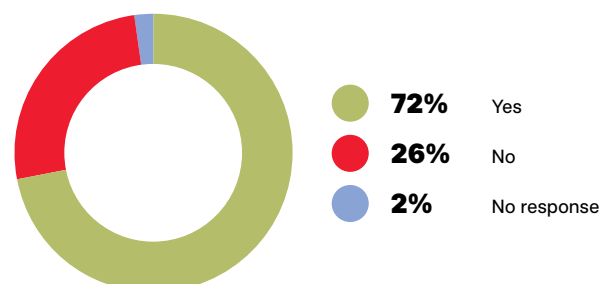


Chart 8: Construction companies with a Modern Slavery Risk Management process in place

CLEANING

Category overview

% of total spend: 2%

% of total number of suppliers: 0.2%

The University outsources the cleaning services across a building asset portfolio of more than 115 building assets and associated fixed plant and equipment across five campuses dispersed across the 300ha of campus. These services encompass standard, external, planned periodic, on-demand periodic cleaning services, and sanitary hygiene services, efficient waste management, and strict adherence to health and safety standards, across a diverse range of building classifications including state of the art research facilities.

In Australia's cleaning industry, the primary risks of modern slavery arise from the vulnerabilities of its workforce. This group largely comprises immigrants, international students and individuals from economically disadvantaged backgrounds, placing them at higher risk of exploitation. Factors like low wages, substandard working conditions and workplace isolation are prevalent. These issues are further intensified by cultural and language barriers, which contribute to a reduced awareness of rights among workers and difficulties in advocating for themselves.

The tender process conducted in 2023 involved a thorough assessment of 26 participating organisations for potential modern slavery risks.

The results highlighted a diverse risk landscape: 27% of the organisations were categorised as Very Low risk, 38% as Medium risk, and another 35% as High risk. None fell into either the Low or Very High risk categories.

A significant portion of these companies primarily employed migrant workers (69%) and international students (76.92%). However, 57% declared that they either have in place or are in the process of implementing various systems and controls to mitigate modern slavery risks, including CAF Prequalification¹.

The shortlisted suppliers had risk ratings of Medium and Very Low. The supplier awarded the contract had a Very Low risk rating and is CAF prequalified.

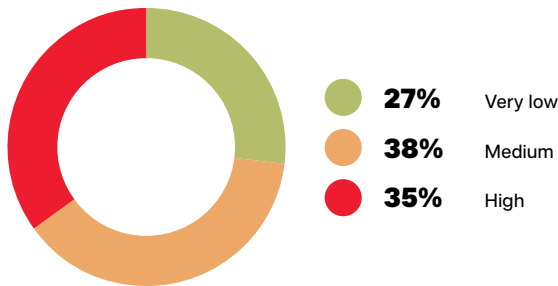


Chart 9: Overview Modern Slavery Survey risk profile of cleaning suppliers in sourcing process

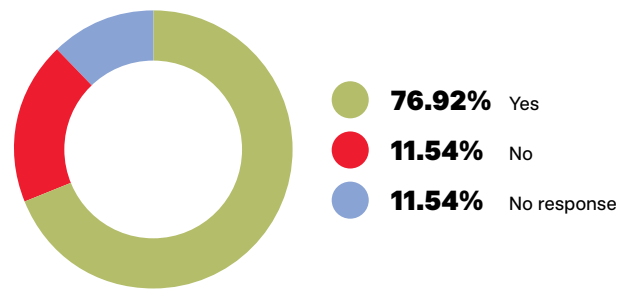


Chart 11: % of Cleaning respondents employing international students

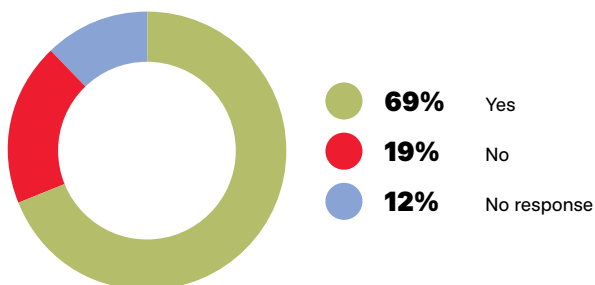


Chart 10: % of cleaning respondents employing migrant workers

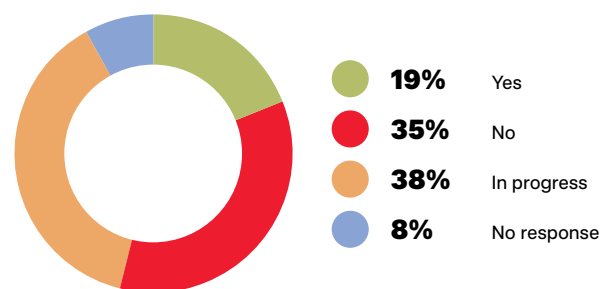


Chart 12: Cleaning respondents in sourcing process CAF prequalification status

¹The Cleaning Accountability Framework (CAF) Pre-qualification refers to a process that cleaning companies undergo to demonstrate their commitment to ethical business practices, compliance with labour laws, and promotion of workers' rights. This process involves assessing a company's employment practices, health and safety standards, and overall adherence to the principles of the Cleaning Accountability Framework and it is a mandatory pre-requisite to obtain the CAF Building Certification.

ELECTRICAL SERVICES

Category overview

% of total spend: 0.6%

% of total number of suppliers: 0.6%

In Australian universities, modern slavery risks in electrical services arise from complex, global supply chains and the layered outsourcing to third-party contractors, which can potentially conceal exploitative labour practices and obscure accountability. In the 2023 tender for the University's Electrical Services Panel, 31 companies participated and 26 were appointed to the electrical panels.

The risk assessment revealed that a significant number of these companies fell into the Low (29%) and Medium (42%) risk categories, while 29% were classified as High risk. None of these companies were deemed to have a Very High risk.

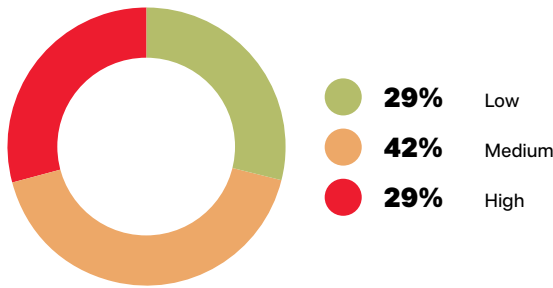


Chart 13: Overview of Modern Slavery Survey risk profile of electrical services suppliers

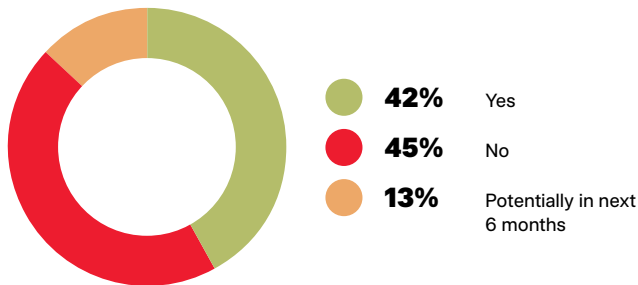


Chart 14: Electrical services respondents that source product, services, material and goods outside Australia and New Zealand

Reflecting on the typical business model for this sector, most of these companies rely on a subcontracting system and source their products, services and materials from outside Australia and New Zealand.

In this category, 74% have implemented processes to screen and assess their subcontractors before engagement. Additionally, 55% offer their staff capability-building training for modern slavery issues, with 39% extending this training to their subcontractors. This highlights an area for potential improvement in industry practice. Griffith will continue to actively encourage the appointed suppliers with Medium to High risk ratings to improve their modern slavery practices by issuing an Improvement Plan tailored to each supplier. The Improvement Plan will be managed as a critical part of Griffith's Contract Management process.

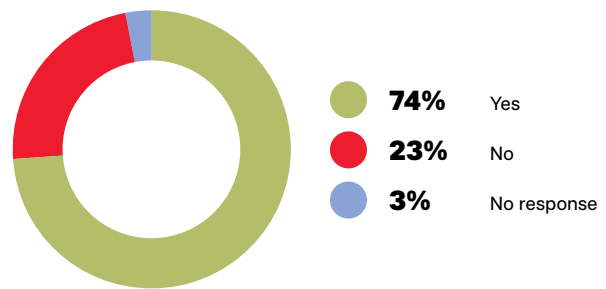


Chart 15: Electrical services respondents with a subcontractor screening and assessment process in place

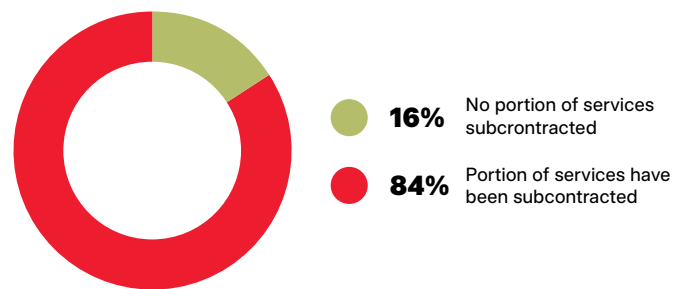


Chart 16: Electrical services respondents who have subcontracted a portion of services during the past 12 months

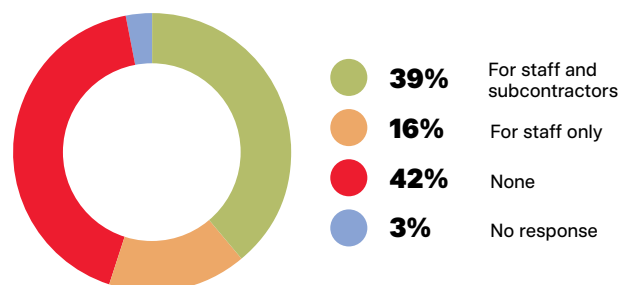


Chart 17: Electrical suppliers respondents implementing training programs to combat modern slavery in supply chains

BUSINESS SERVICES Recruitment agencies

Category overview

% of total spend: 0.5%

% of total number of suppliers: 0.3%

Griffith University's recruitment process, catering to a variety of roles ranging from academic staff to administrative and support positions, typically involves an internal recruitment team and may also include collaboration with third-party agencies for permanent, fixed-term, continuing employment and contingent labour. Vacancies are advertised on the University's official career page and other job portals. Positions are filled following a procedure that includes application collection, candidate shortlisting, interviewing and job offers, while ensuring compliance with employment standards and laws.

The University's 2023 Request for Proposal (RFP) for Recruitment Panels attracted responses from 72 companies, providing insights into modern slavery risks in the recruitment process. Impressively, 95.8% had a survey risk of Very Low, indicating widespread ethical compliance, but the presence of 1.4% in the Very High risk category underscores the need for ongoing vigilance in this sector. There were six suppliers appointed to the panel for Executive and Academic Recruitment, five had a Very Low survey risk rating and one did not complete the survey. There were five suppliers appointed to the panel for Professional Recruitment, four had a Very Low survey risk rating and one had a Medium risk rating. Griffith will encourage the Medium risk supplier to improve their modern slavery practice and implement an Improvement Plan where required.

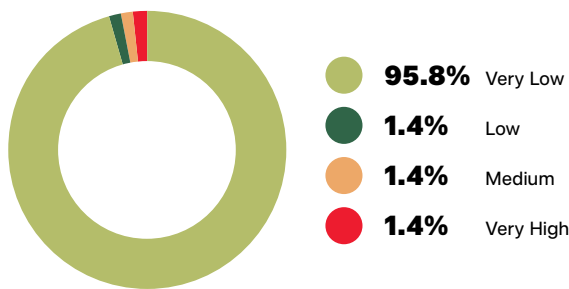


Chart 18: Overview of Modern Slavery Survey risk profile of recruitment agencies

A total of 67% of companies took active steps against human trafficking, especially through training with overseas partners.

Additionally, 42% of companies said they collaborated with NGOs and local authorities, demonstrating their dedication to reducing risks in overseas recruitment.

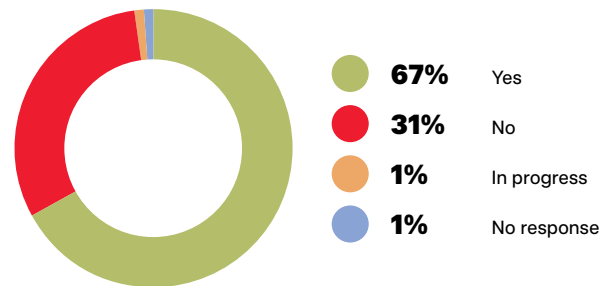


Chart 19: % of responding agencies training on trafficking prevention and ethical recruitment

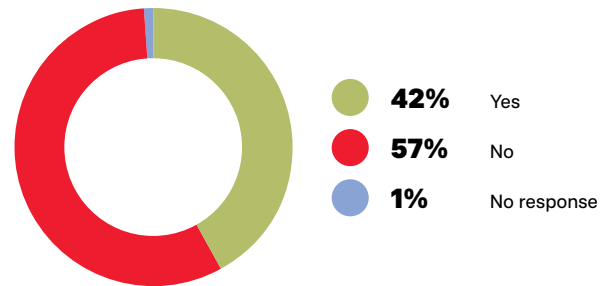


Chart 20: % of responding agencies collaborating

TECHNOLOGY IT (Information Technology) hardware

Category overview

% of total spend: 2.4%

% of total number of suppliers: 0.9%

Griffith procures a range of IT hardware to support its operations, which includes computers (such as desktops, laptops and tablets) for use by staff and students, servers for data storage and network services, and various networking equipment such as routers and switches. Additionally, Griffith acquires printers, scanners, audio-visual equipment for classrooms, specialised laboratory computers and hardware for research purposes, various storage devices, peripheral devices such as keyboards and mice, and interactive learning tools. The associated potential modern slavery risks in procuring these items often stem from complex global supply chains that rely on subcontracting. These can include the use of conflict minerals from countries that use forced labour, exploitative labour practices in manufacturing plants with poor working conditions and inadequate wages—especially in regions with weak labour law enforcement.

KnowTheChain published a report titled *2022 Information and Communications Technology Benchmark Findings Report*² that looked at technology supply chain transparency. It was identified that four in five (80%) of the companies operating in this category had not yet disclosed their tier one suppliers. Limited public access to this information creates challenges in understanding and assessing their modern slavery risk profile. The use of modern slavery questionnaires—as a tool for assessing supply chain integrity—has often proven less effective with many of the technology companies. Recognising this limitation, Griffith considered an alternative more effective approach, collaborating with other public buyers through Electronics Watch to leverage collective influence and gain greater transparency. This evidence-based approach employed by Electronics Watch involves in-depth research, collaboration with local NGOs, and worker-driven monitoring to uncover and address labour rights issues. While this approach yields more accurate and comprehensive results regarding modern slavery risks in supply chains, the process is inherently long-term, requiring sustained engagement and efforts.

In 2023, Griffith conducted an IT service sourcing event, during which participating organisations were assessed using the Informed 365 questionnaire. Remarkably, all organisations scored a Low-risk rating. This outcome can be attributed to the robust mechanisms and processes each organisation has in place to address risks associated with practices such as sourcing materials from overseas and subcontracting portions of the services to third-party organisations.

² [KTC-2022-ICT-Benchmark-Report.pdf \(knowthechain.org\)](https://www.knowthechain.org/KTC-2022-ICT-Benchmark-Report.pdf)

RESEARCH AND LABORATORY SUPPLIES

Category overview

% of total spend: 10.3%

% of total number of suppliers: 13.1%

At Griffith University, procurement for research and teaching categories involves acquiring scientific research equipment, laboratory supplies, chemicals and consumables, while ensuring compliance with safety and quality standards. The University engages with specialised suppliers to access the latest technologies and high-quality materials. Procurement processes are tailored for individual research projects, often requiring unique or specialised equipment.

The procurement of research and laboratory supplies can potentially involve modern slavery risks, particularly when these items are sourced from regions or industries known for poor labour practices. For instance, some laboratory equipment or materials might come from supply chains in countries where regulations and monitoring of labour conditions are inadequate. This situation can lead to the exploitation of workers, including unsafe working conditions, unfair wages, forced labour, or even child labour.

The assessment of the three current suppliers who responded revealed an even distribution of companies across Low, Medium and High risk levels. Although all companies source materials and components from outside Australia and New Zealand, those that proactively manage potential modern slavery risks through established processes and consistent reviews are considered Low Risk. In contrast, the High-risk company lacks such measures. Griffith will encourage the Medium- and High-risk suppliers to improve their modern slavery practices using an Improvement Plan tailored to each supplier. Contract Managers will monitor and report progress against the Improvement Plans.

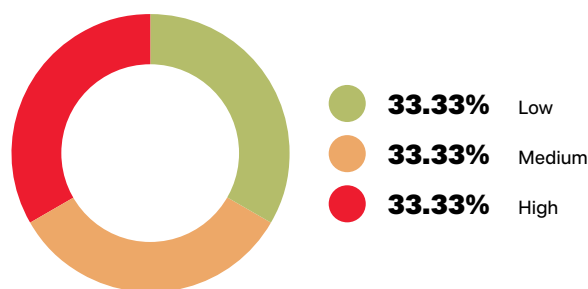


Chart 21: Overview of residual modern slavery risk of responding research and laboratory supplies companies

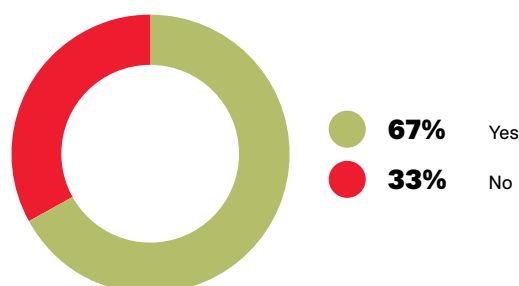


Chart 22: Responding research and laboratory suppliers with modern slavery risk management in place

OFFICE SUPPLIES

Category overview

% of total spend: 0.2%

% of total number of suppliers: 0.3%

To support Griffith's operations, a variety of office supplies are purchased in this category. The range includes a) paper products, such as notebooks and printing paper, b) electronic devices, such as computers and printers, c) furniture such as desks and chairs, and d) miscellaneous items such as pens, markers and whiteboards.

The associated modern slavery risks in these supply chains encompass forced labour and exploitative working conditions, especially in the manufacturing sectors of developing countries where these goods are commonly produced.

The supplier assessment focused on Griffith's major suppliers, yielding some insightful findings. First, it reveals that most of these suppliers fall into the Low-risk category in terms of modern slavery concerns. Despite all of them sourcing materials from overseas, they have implemented various mechanisms and processes to mitigate and address potential risks associated with modern slavery. Second, an encouraging trend is that all but one of the suppliers assessed proactively offered modern slavery training to their staff and suppliers.

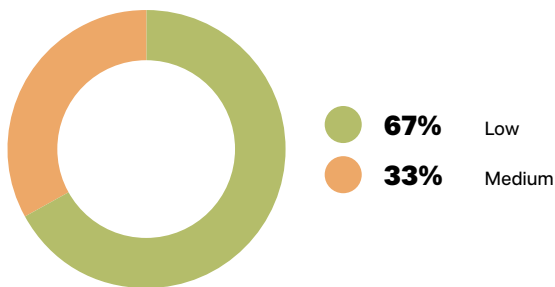


Chart 23: Overview of residual modern slavery risk, responding office supplies companies

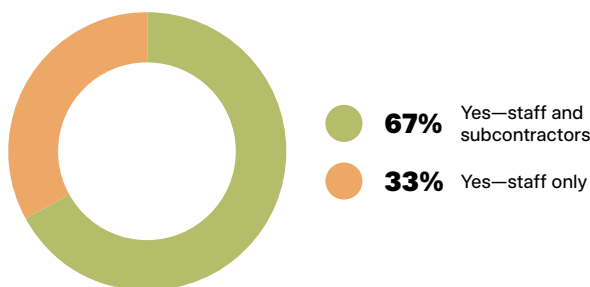


Chart 24: Responding office supplies companies with modern slavery training for staff and suppliers

Griffith Marketplace

Griffith Marketplace is an integrated catalogue-driven marketplace that enables staff with purchasing authority to easily find and buy goods from Griffith's preferred suppliers. This platform offers a wide array of products spanning various categories including electronics, office supplies, furniture, printing services, and research and laboratory supplies. In 2023, Griffith's Marketplace hosted 41 suppliers. Griffith initiated a comprehensive engagement process with its suppliers. This effort led to assessment responses from six suppliers, specifically those in the research and laboratory and office supply sectors. The findings from these assessments are described in pages 18 and 19.

Risks for students

Griffith is committed to preparing students for life and recognises its duty of care towards students. The University actively raises awareness of modern slavery by educating students about modern slavery and alerting them to the dangers of exploitation and scams. This is particularly crucial for international students, who are often more vulnerable due to language barriers and unfamiliarity with local laws.

Recently, Griffith became aware of a sophisticated scam known as the Human Trade Scam that may impact our students. This scam targets young professionals in search of employment. The scam involves job advertisements that promise high salaries and attractive perks, which are a facade for a more sinister operation. The targeted individuals—often well-educated and multilingual—are enticed by the promise of easy work and significant benefits, only to find themselves trapped in compounds across South East Asia, far from their home countries. They are forced into scamming others and suffer from debt bondage, physical and sexual violence, and other abuses. The victims of these scams are defrauded and suffer financial losses, incur debts and face social stigma.

Approximately 220,000 individuals worldwide have been trafficked to this region as result of having been the victim of these types of online scams.



GRIFFITH

CRITERION 4

Griffith's actions to assess and address the risks identified

In 2023, Griffith developed a Modern Slavery Maturity Model that aligns with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and was crafted after an extensive review by two strategic partners: the Mekong Club and Electronics Watch. It consists of two primary elements:

- **framework:** This component presents five stages of maturity that intersect with the UNGPs, outlining specific actions for each level. This framework was crucial in assessing the initial stance in combating modern slavery and in steering Griffith's advancement towards more sophisticated measures.
- **diagnostic tool:** Griffith used a self-evaluation tool, designed to pinpoint a baseline maturity level. It played a key role in identifying the current status, defining the objectives and clarifying the steps required to fulfill those goals.

Implementing this model and diagnostic tool was pivotal in shaping the three-year strategic plan, aimed at mitigating and addressing the risks identified in Griffith's operation and supply chain, and progressively refining the approach to modern slavery.



Figure 3: Operationalising our responsibility to respect human rights through the UNGPs.

Each element of the UNGPs includes internal- and external-facing actions to guide organisations in integrating modern slavery and, more broadly, human rights considerations into their business operations. These actions are summarised below:

POLICY COMMITMENT	GOVERNANCE	DUE DILIGENCE	REMEDATION	ISSUES OF CONTEXT
Policy suite	Accountability and responsibilities	Risk identification	Remediation mechanisms	Compliance with local laws and International Human Rights standards
Stakeholder engagement	Communication	Risk assessment		
	Continuous improvement	Leverage and supply chain collaboration		
		Capability building for internal stakeholders		
		Capability building for external stakeholders		
		Monitoring and review		
		Reporting		
		Grievance		

Policy commitment and governance

In 2023, Griffith continued to strengthen its policy commitments and governance through targeted actions. This focused approach was aimed at enhancing the strategies and furthering effective and ethical compliance in Griffith's operations and supply chains.

ACTION	OUTCOME
<p>Review relevant University policies and include references to modern slavery where relevant and appropriate.</p>	<ul style="list-style-type: none"> Started to develop a list of policies that should reference modern slavery. Updated the Griffith Travel Policy to reference modern slavery risk. Commenced the review of the Talent Acquisition Policy. Updated the Modern Slavery Supplier Assessment and Risk Management Procedure.
<p>Implement tools and methods to monitor the effectiveness of Griffith's actions and promptly take steps to remediate identified concerns where appropriate.</p>	<ul style="list-style-type: none"> Developed the Modern Slavery Maturity Model. Developed a 3-year Action Plan.
<p>Continue to use the Modern Slavery Task Force as a strategic advisory group to implement the University's Modern Slavery Action Plan.</p> <p>Continue to have a dedicated resource to manage Modern Slavery at Griffith University.</p>	<ul style="list-style-type: none"> 3 Task Force Meetings were held in 2023. <p>Dedicated Resources for 2023</p> <ul style="list-style-type: none"> 1 Senior FTE 1 Junior FTE for five months as a support.
<p>Continue to engage in multi-stakeholder initiatives such as AUPN, Electronics Watch and the Mekong Club to identify and address risks of modern slavery proactively and explore new collaboration opportunities.</p>	<ul style="list-style-type: none"> Subscribed to FRDM— media alerts. Participated in the Electronics Watch Working Group.



Due diligence

In 2023 Griffith has enhanced its due diligence approach through the following actions:

ACTION	OUTCOMES
<p>Continued to play an active role within AUPN to leverage resources, expertise and innovation to advance the University sector's approach to modern slavery.</p>	<ul style="list-style-type: none"> ▪ Led the Risk Identification and Prioritisation Working Group. ▪ Invited the Mekong Club as guest speaker. ▪ Leading the potential transition of Modern Slavery software provider. ▪ Commenced conversations with the Red Cross to establish an online Work Right Hub for International Students.
<p>Rolled out and monitored the completion rate of the modern slavery training for suppliers, starting with High-risk, high-priority supply chains, and develop new tools and initiatives to support suppliers in advancing their approach to modern slavery and meeting Griffith's expectations.</p>	<ul style="list-style-type: none"> ▪ Developed a Handbook and Guidelines for Suppliers, designed to guide them through Griffith's due diligence process. Both documents were published on the Supplying to Griffith webpage. ▪ Suppliers receiving the modern slavery questionnaire are being offered a complimentary initial consultation with the Mekong Club. ▪ Trialled supplier education sessions as part of a tender process to create awareness. ▪ Mekong Club Supplier Portal is in development to be shared with Griffith's suppliers in near future.
<p>Continued to monitor Griffith's operations to identify emerging risks and prioritise and address those risks.</p>	<ul style="list-style-type: none"> ▪ Continuous engagement with external stakeholders such as the Mekong Club, Electronics Watch and CAF (Cleaning Accountability Framework). ▪ Conducted sessions with internal stakeholders—such as Griffith International and the Student Life team—to discuss modern slavery, jointly pinpoint potential risks within the University's processes and developed a plan to mitigate and address these risks, e.g., vulnerability to scam of international students. ▪ Streamlined the Informed 365 due diligence questionnaires, assessment and supplier management process—refer to the Modern Slavery Supplier Assessment and Risk Management Procedure. Main change: Tailored the survey based on the supply profile. All suppliers are asked to complete a short questionnaire and only the Medium/High/Very High-risk suppliers required to complete a longer, more granular survey. ▪ Assisted internal stakeholders in assessing modern slavery as part of their sourcing activities e.g. consultations and training. ▪ Assisted internal stakeholders in assessing existing suppliers' modern slavery risk profile using Informed 365 Platform with risk rating as a key evaluation criterion in sourcing events. ▪ Started to roll out an Improvement Plan to suppliers rated High Risk (5 suppliers) through Informed 365.
<p>Rolled out and monitored the completion rate of the e-learning modern slavery training for staff and launched new learning initiatives to continue to embed modern slavery considerations into Griffith's business decisions.</p>	<ul style="list-style-type: none"> ▪ Griffith's Modern Slavery Training Module was piloted with 33 staff members across functions (CS, L&T, Sustainability). The Module includes an introduction from the Vice Chancellor. ▪ Training session for the 15 procurement staff on supplier due diligence and the use of Informed 365.

ACTION	OUTCOMES
<p>Collaborated with key stakeholders to launch new initiatives to raise students' awareness and understanding of modern slavery.</p>	<ul style="list-style-type: none"> ▪ Three webinars (including external guest speakers) on modern slavery were delivered within the Green Bites program participants³: <ol style="list-style-type: none"> 1. Electronics Watch: interplay between environmental risks and human rights 2. Mekong Club: Modern Slavery in the Private Sector with focus on the apparel industry to support the Clothing Library Initiative led by one of Griffith's students. 3. CAF: Modern slavery in the cleaning industry—the risks, how to spot them and what to do to mitigate and/or account for ▪ One domestic Griffith Business School student did an internship with the anti-slavery team. ▪ One international student completed a work placement with the anti-slavery team. ▪ Human Trafficking Scam awareness initiatives were delivered including a newsletter and information on MyGriffith. ▪ A module on modern slavery was added to Griffith's online MBA. ▪ Presentations were given to Griffith International, Student Life, and Student Health, Counselling and Wellbeing. ▪ We presented on Griffith's approach to modern slavery and the lessons learned at both the Queensland Procurement Community of Practice and Electronics Watch's international summit.
<p>Continued to engage with High-risk and high-priority suppliers through the Informed 365 dashboard for risk assessment and management, ethical onboarding, and awareness and capability building.</p>	<ul style="list-style-type: none"> ▪ Increased number of suppliers assessed (from 59 in FY22 to 148 in FY23) ▪ Suppliers now agree with Griffith's Supplier Code of Conduct in the assessment phase via Informed 365—they cannot submit the modern slavery questionnaire unless they read and acknowledge Griffith's Supplier Code of Conduct.
<p>Engaged with key external and internal stakeholders to conduct a deep-dive risk assessment in selected, high-priority supply chains.</p>	<ul style="list-style-type: none"> ▪ Electronics Watch—We participated in a large global technology Working Group aimed at creating a critical mass among public procurers around the world to demand disclosure and transparency.
<p>Carried out targeted on-site assessments in High-risk and high-priority supply chains.</p>	<ul style="list-style-type: none"> ▪ On-site visits to construction sites on campuses (Nathan, Gold Coast and Logan) were conducted to ensure that grievance posters for workers are placed in strategic locations to create awareness for construction staff in modern slavery related issues.

³Green Bites are short online sessions aimed at creating awareness of environmental and socially sustainable practices within Griffith University.

Remediation

In 2022, Griffith developed a robust approach to grievances and remediation, which included establishing a comprehensive procedure and implementing legitimate processes that are accessible, impartial and transparent.

Building on these foundations in 2023, Griffith took further steps to ensure the effectiveness of its grievance mechanisms. This included placing grievance posters in strategic locations for contractor and sub-contractor workers across campuses, ensuring visibility and accessibility. Griffith also activated the existing Your Call hotline to include whistleblowing for modern slavery issues. The phone line is monitored regularly and processes are in place for the escalation and management of grievances.

In 2023 no grievances were lodged.

Issues of context

The UNGPs provide a global standard for preventing and addressing the risk of adverse impacts on human rights linked to business activity. The “issues of context” in the UNGP refer to the specific circumstances within which an organisation operates that can affect the realisation of human rights. These can include legal, political, economic, social and cultural conditions. Understanding the context is crucial for businesses to identify, prevent and mitigate their human rights impacts effectively.

Griffith does not operate abroad but its supply chains extend internationally—the University strives to implement the UNGPs wherever it has an impact, recognising that engagement and dialogue play a pivotal role to advance human rights.

To this end, Griffith has been creating opportunities for engaging with stakeholders, including suppliers, NGOs (the Mekong Club, Electronics Watch, CAF, the Red Cross), and industry peers (AUPN, QLD Procurement Community of Practice), to gain valuable insights into the human rights context and challenges in the supply chains, helping to inform more effective strategies for addressing these issues. An example of this is the invaluable contribution of the CEO from the Mekong Club, and a human trafficking academic expert, who is a member of Griffith’s Modern Slavery Task Force. Their deep insights into the latest trends and challenges in modern slavery significantly enhanced our organisation’s capacity for effective risk management, compliance, and ethical decision-making, ensuring the strategies remained informed and proactive.

CRITERION 5

How we assess the effectiveness of our actions

At Griffith, we believe that monitoring and reviewing the progress of initiatives to eradicate modern slavery from our operations and supply chains is critical to improving our approach over time and addressing emerging issues. We recognise that full eradication will take time and is an ongoing challenge and that much of what we do helps minimise the risk of modern slavery in our supply chains.

In 2023, Griffith assessed the effectiveness of its Modern Slavery actions through the following actions.

ACTION	ASSESSMENT EFFECTIVENESS
Regular reviews and tracking actions	Continually reviewed progress against the 2023 Action Plan.
	Reported action progress to the Modern Slavery Task Force.
Regularly checking risk assessment processes and trend identification	Continually worked with affiliates to identify emerging risks. Assessed new suppliers to identify risk profile.
Regular engagement	Met regularly with the University Task Force.
	Held regular meetings with affiliates.
	Engaged regularly with Student Services and Human Resources, focusing on training and awareness for students and staff.
Internal audits and monitoring	Conducted campus site audits to ensure that posters for onsite contractors were in prominent positions and visible.
Working with suppliers	Implemented a process for Improvement Plans linked to suppliers in High-risk categories to improve their capacity and capability to respond to modern slavery risks.
Trend identification	Regular engagement with Affiliates to identify new trends
	Monitored the Your Call line for any grievances.
Partnering with industry groups	Worked with affiliates to identify high-risk areas in the sector.
	Collaborated with Electronics Watch to support a large High-risk technology supplier to improve their capacity to respond to modern slavery risks.

CRITERION 6

Consultation

This statement is made on behalf of Griffith University and its non-operational subsidiary International Water Centre Pty Ltd.

CRITERION 7

Other relevant information

Key learnings

Reflecting on Griffith's 2023 efforts to identify, mitigate, and address modern slavery risks, engaging both internal and external stakeholders has been pivotal.

This collaborative approach has not only heightened awareness but has also ensured strategic alignment, fostering a culture of risk awareness and responsibility throughout the organisation.

Incorporating diverse stakeholder perspectives has provided practical insights, enhancing the adaptability and effectiveness of the action plans. For instance, integrating Modern Slavery Risk Assessments into Griffith's supplier evaluation process has significantly improved effectiveness, achieving a 98 per cent completion rate in assessing new suppliers for modern slavery risks.

These efforts highlight the value of a collaborative and informed approach in combating modern slavery, guiding the continued commitment to ethical operations and impactful actions against modern slavery in Griffith's supply chain.

While Griffith acknowledges the growth in its maturity to address modern slavery, it also understands the complexities and changing landscape within its global supply chains, and the need to continually evolve and collaborate to address emerging risks. The identification of Medium to Very High risks within Griffith's supply chain, highlights the need to have a proactive approach for managing residual risks. These residual risks will be addressed using Modern Slavery Improvement Plans tailored to individual appointed suppliers, that will form a critical part of Griffith's Contract Management Framework and will fall under the responsibility of the Contract Managers to monitor progress.

2024 Work Plan

As Griffith looks ahead, the University remains steadfast in advancing human rights in its operations and supply chain. The achievements and insights gained in the past year have propelled Griffith forward, inspiring strategic initiatives and targeted actions outlined in the 2024 Modern Slavery Acton Plan. Focus will be placed on the following:

The University's operations

- Continually reviewing relevant university policies and recruitment processes to ensure they reference Modern Slavery.
- Build capability for staff by rolling out modern slavery training.
- Conduct supplier questionnaires with student recruitment agencies.
- Create an awareness campaign during recruitment and onboarding of international students.
- Continue to use Your Call as a mechanism for modern slavery grievances to be raised.
- Continue to actively promote Griffith's grievance channels to contractors working on campus.

University supply chain

- Continue to use Informed 365 to assess suppliers' modern slavery risk during sourcing processes.
- Continue to assess existing suppliers with High-risk supply chains using Informed 365.
- Continue to embed the Improvement Plan processes into Griffith's Contract Management of highest risk suppliers.
- Collaboration with key internal and external stakeholders to better understand risk in Griffith's supply chains.

Students

- Continue to promote scam awareness.
- Work with Student Life to increase awareness of forced marriages.

Declaration

This statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and constitutes the Modern Slavery Statement of Griffith University for the year ending 31 December 2023.

The statement was approved by the Griffith University Council on 10 June 2024 and has been signed by the Vice Chancellor on 10 June 2024.



Professor Carolyn Evans
Vice Chancellor and President





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