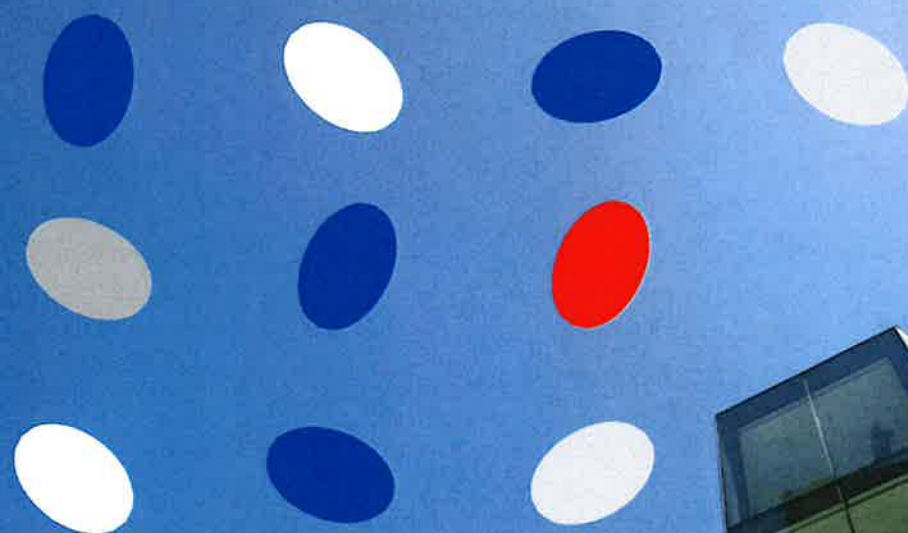




University of Technology Sydney

2025 Modern Slavery Statement



UTS CRICOS 00099F
UTS TEQSA PRV12060

Acknowledgement of Country

University of Technology Sydney (UTS) acknowledges the Gadigal people of the Eora Nation, the Boorooberongal people of the Dharug Nation, the Bidiagal people and the Gamaygal people upon whose ancestral lands our university stands. We would also like to pay respect to the Elders both past and present, acknowledging them as the traditional custodians of knowledge for these lands.

Introduction

This statement has been prepared pursuant to the *Modern Slavery Act 2018 (Cth)* and outlines actions taken by the University of Technology Sydney (UTS) to identify, assess and address modern slavery risks in its operations and supply chains over the period of 1 January 2025 to 31 December 2025.

Criterion 1: The reporting entity

UTS (ABN 77 257 686 961) is a statutory corporation established in NSW pursuant to the University of Technology Sydney Act (1989) NSW (UTS Act). UTS is registered with the Australian Charities and Not-For-Profits Commission and our CRICOS (Commonwealth Register of Institutions and Courses for Overseas Students) provider number is 00099F.

The statement is made by UTS following consultation with UTS Global Pty Ltd (ACN 32 154 014 481), one of its controlled entities (established pursuant to Section 16A of the UTS Act):

InSearch (Trading as UTS College ABN 39 001 425 065) is also a controlled entity and a reporting entity under the Modern Slavery Act. UTS College prepares its own Modern Slavery Statement, approved by its Board of Directors and is not included in this statement

Criterion 2: Structure, operations and supply chains

Structure and operations

UTS is a public university of technology defined by our support for the economic, social and cultural prosperity of our communities. We are measured by the success of our students, staff and partners and committed to research, innovation and the dissemination of knowledge of public value. We are, and always will be, an inclusive university.

In 2025 UTS:

- had approximately 54,406 students enrolled, including more than 15,380 international students
- offered over 524 undergraduate and postgraduate courses across traditional and emerging disciplines
- employed 4,399 full-time equivalent (including casual) staff members
- had a total expenditure on operating activities of \$1.4 billion
- engaged with more than 3,103 suppliers with an annual spend of approximately \$380M.

UTS Council is the governing body of the university, established in accordance with the UTS Act and By-law and relevant UTS Rules. Council composition comprises both appointed and elected members and its powers and functions include management and control of the university's affairs, concerns and property.

UTS is located primarily at its city campus, which comprises 3 main precincts: Broadway, Haymarket and Blackfriars. The UTS city campus provides teaching, learning, research, social and administrative facilities. Facilities are also located at the Moore Park and Botany precincts. Our principal address is 15 Broadway, Ultimo NSW 2007.

The full university structure and the responsibilities of each portfolio can be found on our [website](#).

Supply chains

The UTS supply chain includes procurement required to support university operations in teaching, learning, research and professional support services, as well as downstream partners (e.g. subcontractors and those supporting the delivery of international research programs). The categories of goods and services UTS procures are set out below.

Category	Goods and Services
Business Services	• Human resources • Corporate professional services • Marketing & media • Travel & entertainment • Office related supplies & service • Logistics & storage
Property & Facilities	• Buildings & grounds • Construction, refurbishment & works • Property management • Utilities & renewables • Plant and equipment
Research and Training	• Laboratories & research expenses • Teaching expenses • Library services • Student services
Technology	• IT Software • IT Hardware • IT Professional services • Telecommunications • Audio visual

Criterion 3: Risks of modern slavery practices in operations and supply chains

UTS maintains a robust risk management framework that aligns with the *ISO 31000:2018 risk management* standard. As part of the process of strategic and operational planning, risk assessments are conducted annually and are part of a continuous improvement cycle:

- **Identify** - undertake risk reviews to better understand modern slavery risks and collaborate with other universities through a Community of Practice
- **Remediate** - work with business units to develop plans to address risk areas, implement plans and provide ongoing monitoring of risk
- **Sustain** - take learnings from previous phases to modify future approaches and conduct a maturity assessment on internal capabilities.

Further activities undertaken to strengthen procurement and supply chain management include:

- regularly assessing operations and supply chains to identify areas at high risk of modern slavery
- regularly conducting due diligence and risk assessments to identify and mitigate risks of modern slavery within supply chains
- established mechanisms for reporting any incidents of modern slavery.

During 2025, UTS started a review of modern slavery risks related to our operations, supply chains and collaborations. The review focused on the 4 areas outlined below. **Currently, 3,103 of our direct suppliers and trading partners – covering 98% of our supplier base – have been risk assessed.**

Area	Modern Slavery Risk Taxonomy	Risk factors
Our people	Employment practices Workers subjected to exploitative conditions, coercion, or other forms of abuse	• Exploitation of staff by subjecting them to long working hours, inadequate wages, or unsafe working conditions, particularly by taking advantage of their dependency on visa sponsors or fear of deportation. • Inadequate oversight and monitoring of labor practices within the university, allowing abusive employment conditions to persist undetected. • Exploitation of migrant workers or employees with vulnerable immigration status, subjecting them to discriminatory treatment, and limiting their ability to assert their rights.
	University Supply Chains and outsourced services Procurement and supply chain management, including suppliers and contractors - sourcing from high-risk regions, outsourced services	• Sourcing from regions with weak labour laws or a history of labor exploitation increases the risk of modern slavery within the supply chains. • Local or international suppliers are unable to demonstrate compliance with the Modern Slavery Act. • Lack of sufficient due-diligence and oversight over contract services for international student recruitment agencies, cleaning, catering, security, and maintenance contracts. • Services from industries that are considered high risk areas of modern slavery, such as IT, construction, medical consumables and cleaning. • Contracted workers may be vulnerable to modern slavery conditions due to dependence on recruiters, lack of legal protections and potential barriers to seeking help. • Decentralised procurement activities that impede oversight of localised due diligence related to modern slavery.
Our students	Engagements and interactions with domestic and international students Students subjected to various forms of exploitation, coercion, or abuse	• Lack of awareness of information about workplace risks, rights and support services. • Students might be deceived by fraudulent job offers that lead to exploitative working conditions. • International students might be unaware of their rights and the standard working conditions in Australia, making them more vulnerable to exploitation. • Work restrictions tied to student visas can lead to exploitation, as students might be forced to work illegally or under exploitative conditions to support themselves.

Area	Modern Slavery Risk Taxonomy	Risk factors
Our business	Research Collaborations International collaborations	- Collaborating with research institutions and/or research partners in countries with inadequate labor protection laws. - Collaborating entity engages in unethical labor practices. - Inadequate transparency and lack of scrutiny in research funding sources resulting in unintended association with unethical and exploitative practices. - Not conducting thorough risk assessments before starting research projects, especially those involving fieldwork in high-risk areas.
	Investments and fundraising activities Inadvertently supporting or being associated with entities engaged in exploitative labour practices, human trafficking, or violations of human rights through investment portfolios or fundraising efforts	Investments: - Holding investments in companies that have been linked to modern slavery, exploitation or other forms of human rights abuses - Inadequate due diligence on potential investment opportunities may result in investments in companies that have ties to modern slavery or human rights abuses. - Investments in industries known for a high prevalence of modern slavery, such as construction, mining, or hospitality. Advancement: - Accepting donations or funds from individuals, corporations, or foundations with questionable ethical practices, including ties to modern slavery or exploitative labour practices. - Insufficient transparency regarding the sources of funding, including investments and donations, can obscure potential connections to modern slavery or unethical practices.

Criterion 4: Actions taken to address risks, due diligence and remediation processes

Risk Management and Governance

UTS is focused on ensuring that members of the executive and other senior managers promote a responsible risk management culture within their areas of responsibility, building awareness and compliance with policy and procedures.

The UTS Modern Slavery Working Group comprises senior representatives from across key areas of UTS to ensure:

- broad engagement in risk identification across our operations and supply chain
- progress on priority actions identified in our Modern Slavery Statements
- that UTS continues to comply with the requirements of the *Commonwealth Modern Slavery Act* and NSW Modern Slavery legislation.

The Working Group has facilitated a thorough and coordinated approach to identifying and addressing existing and emerging risks of modern slavery across our operations and assisted in increasing awareness of modern slavery across UTS.

UTS will undertake targeted testing of key controls to assess their design and operational effectiveness, identify any gaps, and implement remediation actions to strengthen alignment with regulatory obligations.

Our People

Raising awareness of modern slavery

UTS continues to build on a program of activities, events and communications designed to increase awareness of modern slavery among staff and students. UTS is home to [Anti-Slavery Australia](#) (ASA), the country's only specialist legal, research, and policy centre dedicated to ending modern slavery. Through free legal services, advocacy, and education, ASA works to protect the rights of those affected by modern slavery in Australia.

ASA offers 2 free online courses which are available on UTS Open, the UTS online public learning platform. 'Modern Slavery' provides an overview on the types of modern slavery, using examples and real-life stories to illustrate the issue and how to respond. 'Modern Slavery in the Home' focuses on identifying and addressing modern slavery in domestic settings, providing participants with practical skills to navigate difficult conversations and provide support. All UTS staff are provided with access to these courses.

Two further tailored education modules were developed and delivered by ASA for a neighbouring university, each course was designed for staff and students respectively. The courses provide practical knowledge on modern slavery, including its forms and drivers, indicators of risk, prevention strategies and available support options. Through this targeted education initiative, ASA strengthened awareness across the university sector, enhanced participants ability to identify and respond to potential modern slavery risks and prevent and address exploitation. UTS also shares information about educational initiatives including resources, forums and podcasts to raise awareness of forced marriage and other forms of modern slavery which can impact on students. For example, [ASA's Frontline Worker Guide: Identifying and Responding to Forced Marriage in Australia](#). This Guide supports frontline workers, including teachers, university staff and community members in Australia, to identify and respond to individuals affected by forced marriage. The Guide is currently being adapted into a series of short educational videos to increase its reach and accessibility for different audiences.

In 2025, UTS also displayed ASA's forced marriage awareness-raising posters on rotation on large digital screens across the Sydney campus. These screens are located in high-traffic areas, with the potential to reach the university's staff and student population of over 55,000 people. UTS will implement further communication and support initiatives within a broader and sustained engagement strategy for 2026. This will strengthen awareness, embed policy requirements in practice and ensure ongoing alignment with its reporting and compliance obligations. An example of this is our plan to host the [Human Mart exhibition](#) to raise awareness of modern slavery and make the issue more visible and personal. This will promote human rights, encourage ethical awareness and empower students and staff to recognise and respond to modern slavery.

Our Supply Chain and ethical sourcing

In 2025, UTS remained an active member of the University Anti-Slavery Program, led by the Australasian University Procurement Network (AUPN). This collaboration helps universities demonstrate leadership, streamline efforts and drive meaningful change in supply chains. By leveraging shared expertise, aggregated buying power and engagement with academics and civil society, AUPN members stay ahead of emerging risks while fostering a strong, cooperative procurement network. Key benefits include:

- **Compliance** – Demonstrating sector leadership on modern slavery.
- **Efficiency** – Reducing duplication and cutting costs.
- **Effectiveness** – Using collective buying power and scale to drive change.
- **Capability** – Accessing academic expertise and industry insights.
- **Collaboration** – Engaging with a committed, socially responsible procurement network.

UTS actively provided its procurement spend data to the AUPN to support a sector-wide modern slavery risk identification and mapping exercise. This approach deliberately leveraged the collective spend, expertise and market influence of Australian universities to strengthen supply chain risk visibility and drive meaningful impact at scale. By adopting a coordinated, sector-wide approach, UTS maximised efficiency, reduced duplication of effort and minimised the compliance burden on suppliers by avoiding repetitive information requests across institutions.

The collective assessment also strengthened shared learning across the sector and ensured that insights were consistently applied to supplier engagement and risk mitigation activities. This enhanced the University's ability to influence suppliers, apply proportionate responses to identified risks and contribute to sustained improvements in modern slavery risk management.

In parallel, the university commenced implementation of the Inherent Risk Identification Tool (IRIT) taxonomy within its internal spend cubes. Embedding this taxonomy enables early identification of inherent modern slavery risk at the category level, allowing category managers to be alerted in advance and to proactively plan risk mitigation measures during the category strategy and category management phases.

Procurement risk management process

UTS acknowledges that in line with the UN Guiding Principles on Business and Human Rights, UTS may be involved in modern slavery through one of three ways: cause, contribute or directly linked. These risks may be elevated in certain supply chains, due to factors such as geographical location and / or source locations for materials and products procured.

UTS has a structured modern slavery risks management process in relation to procurement and supply chains. This process involves:

1. Identifying all direct vendors.
2. Mapping the location of suppliers, the amount of money UTS spends with them and the products and services they provide the university.
3. Evaluating the severity / probability of a risk.
4. Relationship to this risk (causes, contributing factors, or direct university impacts).
5. Risk profiling suppliers operating in high-risk, high-spend categories that are most salient to our sector. This is determined by consideration of the above factors, use of the IRIT and in coordination with AUPN Anti-Slavery program.
6. Issuing a Modern Slavery Questionnaire to suppliers profiled as a higher risk and working with these suppliers to improve practices, where possible to do so.

Engagement with the AUPN Modern Slavery Program

In 2025, UTS through its involvement in the AUPN Modern Slavery Program, advanced work across three program pillars: Risk Data, Capability Uplift and Stakeholder Engagement.

1. Risk Data

AUPN's Modern Slavery Program conducted sector-wide risk assessments to identify and prioritise supply chain categories with the highest potential impact. In 2025, UTS reviewed over 3,103 suppliers, representing a spend of \$380 million, to map and monitor modern slavery risks across procurement activities. Focus areas include medical equipment, ICT (i.e. laptops and end user computing) and Promotional Goods. These focus areas were driven by developments and decisions across the AUPN and included specific initiatives, such as the creation of informational leaflets about the risks of buying cheap promotional goods.

UTS also participated in procurement activities with University Procurement Hub (UPH) to address collective risks in high-risk categories and any issues with industry partners.

2. Capability Uplift

In 2025, UTS attended nine dedicated forums featuring expert speakers, survivor advocates and procurement professionals. These forums explored topics such as ethical apparel procurement and the use of risk identification tools. UTS also remained informed through regular newsletters, university case studies and monthly updates, supporting continuous learning and capability improvement.

Internally, UTS leveraged the Procurement Communities of Practice channel to raise awareness of supply chain risks and to encourage completion of relevant training. UTS intends to embed this training into the onboarding process for all staff involved in procurement and purchasing.

Awareness-raising has also been a key focus, with engagement through procurement communities of practice to communicate the university's obligations and highlight the impact that purchasing decisions can have on human rights outcomes. This training module is scheduled to become mandatory in 2026 for all procurement and purchasing practitioners across the university.

3. Supplier Engagement

In the ICT category, UTS participated in an Electronics Watch pilot program. Common risks identified included illegal wages, health and safety, discrimination, excessive hours, and forced labour.

The AUPN Supplier Assessment Questionnaires (SAQ) in the laboratory and medical consumables category has revealed a broad spectrum of understanding of modern slavery. In 2025 further engagement was conducted with five suppliers who presented the greatest levels of risk in medical and laboratory consumables category.

Further, AUPN began a detailed review into modern slavery risks in the medical gloves category. This is a significant area of procurement and was initiated following media alerts and notifications from the FRDM system, indicating concerns with business practices and instances of modern slavery in supply chains. This investigation builds on a review conducted in 2021 into the medical consumables sector and will be finalised in 2026.

The university took part in the Cleaning and Security Guarding UPH procurement processes, where suppliers were screened for modern slavery risks through targeted questionnaires and specific compliance requirements. These processes helped ensure that risk considerations were embedded at the point of supplier selection.

University representatives regularly attended and participated in relevant training, including sector-wide seminars, particularly those focused on higher-risk categories or emerging sources of support. This ongoing engagement helped build capability and awareness across procurement teams, strengthening the university's overall approach to risk identification and management.

Ethical sourcing improvements

Procurement effort and resources were prioritised toward categories with elevated modern slavery risk indicators and higher levels of spend. This risk-based approach ensured that attention and action were directed where they would have the greatest impact.

Modern slavery considerations were also embedded into sourcing activities. Criteria were integrated into sourcing documentation, including RFx processes, tenders and panel arrangements, to assess supplier capability and the maturity of their risk management practices.

UTS also strengthened its commitment to ethical sourcing in the following ways:

Area	Activities undertaken
Preferred Suppliers	Through the tendering process and broader due-diligence, a list of UTS Preferred Suppliers form a panel of suppliers that are bound under contract to abide by UTS terms and conditions. Appropriate contract clauses addressing modern slavery are included. These clauses cover key areas such as compliance with modern slavery laws, taking corrective action if issues are found and potential termination of contract for serious breaches. UTS restricts purchases to within the approved supplier cohort. Ongoing due diligence is applied for modern slavery and overall supplier diversification risks and any non-compliance found the supplier risks removal from the panel. All new vendors in high-risk categories, as well as those engaged through collective purchasing arrangements, are also assessed for modern slavery and other ESG risks during the evaluation and onboarding stages, in accordance with the structured Modern Slavery Risk Management process.
Supplier Code of Conduct	Suppliers are provided the Supplier Code of Conduct, which includes an outline of expectations regarding labour, human rights and implications for non-compliance.
Sourcing activities	UTS uses benefit trackers and Spend Cube for mapping sourcing activities. These activities are cross-referenced with government regulatory standards to flag high-risk categories and inform procurement decisions. High-risk findings are validated through deeper due diligence during contract renewal, tendering processes or engagement with suppliers.
Questionnaire for Vendors	All new vendors are advised of UTS position on modern slavery and ethical sourcing. Vendors identified in high risk categories (such as medical supplies) may be required to complete a questionnaire as part of contractual obligations. UTS follows up on responses to the questionnaire and further engagement with the vendor may be conducted where there is a specific need or modern slavery risk. UTS may provide these vendors, where needed, with the AUPN Supplier Anti-Slavery Kit, which contains 6 practical recommendations to help suppliers improve their awareness and practices regarding modern slavery risks.

Area	Activities undertaken
Training	UTS has a training module for supervisors and managers with financial delegation for procurement and purchasing. This module includes guidance on reducing the risks of modern slavery when procuring goods and services. The module is under review and has already been updated with improvements, such as training notifications, to ensure staff continue to complete the compliance training. Additionally, the Anti-Slavery Awareness course for UTS staff has been updated following feedback from key stakeholders. Implementation will commence in 2026 with plans for UTS wide promotion to encourage participation.
Monthly Forums	In addition to collaboration with the AUPN's Modern Slavery Program UTS also participated in monthly forums and maintained membership in the Modern Slavery Risk Review subcommittee. The AUPN forum is a key driver of modern slavery risk management. Relevant information or initiatives shared in the forum are considered for action by UTS and the sector to improve procurement process, supply chain risks or other areas of the university who are mitigating risks of modern slavery. These forums and engagement bring the insight and expertise of other sectors to UTS, providing different approaches and other risk mitigation for modern slavery.
Staff procurement guidance	UTS purchasing staff receive ongoing internal education on procurement choices, especially in high-risk categories. Staff are encouraged to consider the risks associated with purchasing goods and to avoid buying certain items. This includes not purchasing very low cost promotional goods from sources where these low costs indicate an increased likelihood of modern slavery in the supply chain. As UTS may be limited in its control and influence over a given supplier's modern slavery risk management practices, UTS staff are also encouraged more broadly to take further consideration and care when making purchasing decisions, where possible.

Property and contractors

UTS has successfully renewed its membership of the Cleaning Accountability Framework (CAF), ensuring continued access to industry standards, benchmarking tools and best-practice guidance for cleaning operations. UTS was the first university in Australia to have a CAF 3-Star certified building at Moore Park Campus.

The CAF membership is driven by UTS awareness of the modern slavery risk to people, through employment arrangements where staff are sourced through contractors, particularly in the areas of cleaning, security and hospitality. The CAF provides access to a range of resources and support to address modern slavery risks. This partnership has contributed to increasing awareness of modern slavery among key staff at UTS and enables a pathway for consultation with unions representing staff in the contract cleaning industry.

UTS recognises those companies who are likewise committed to ethical business practices and strives to mitigate modern slavery risks in the following ways:

- The contractor must fully and genuinely cooperate in the CAF certification process to achieve the 3-Star Standard and maintain compliance for the remainder of the contract.
- UTS intends to complete one audit of the cleaning contractor per year.
- The contractor is contractually obligated to align with CAF and will be required to regularly report to UTS on ongoing compliance with the CAF 3-Star Standard. Guidance will be provided to assist contractors meet this obligation.
- The cleaning contractor will be required to participate in CAF's job security provisions, which seek to ensure that long-term cleaners do not lose their job as a result of a change of contract.

In 2026, UTS will continue to engage with the CAF regarding certification of further buildings on campus. Support will be sought through governance pathways for investment, prioritisation of building certification and timelines for implementation.

Our Students

As a global education provider, UTS is particularly focused on the significant risk faced by international students. Ensuring vulnerable student cohorts, such as international students, are protected from modern slavery and other forms of exploitation, such as underpayment of wages and exploitation of visa arrangements, is a key area of action at UTS. The university has implemented a wide range of ongoing services for all students to support their awareness of modern slavery risks, learning, health and wellbeing. These are delivered by teams led by the Deputy Vice-Chancellor (International) and the Deputy Vice-Chancellor (Education and Students).

Services are also delivered by the Student Services Unit include: UTS HELPS (providing English language and academic support services), UTS Careers, UTS Health, UTS Counselling Financial Assistance Services, and UTS Housing. Services include:

Area	Risk factors and activities undertaken
Work rights	Commencing international students are advised by UTS about their rights to work as student visa holders in Australia through the UTS Orientation program. UTS Careers has a particular focus on ensuring students understand their rights and entitlements in the workplace and continue to use the career management platform (CareerHub) to: • monitor opportunities posted to the job board and reject those that do not meet minimum wage requirements • monitor employer accounts for potential job scams and reject / block identified scams • share information on job postings to encourage all students to visit the Fair Work Australia website to prepare for employment and understand their employment rights • house relevant career related resources; including a targeted International Student Career Guide and work rights information • provide an avenue for internship students to anonymously report concerns, in addition to the formal internship processes. At the end of 2024, UTS Careers added content on modern slavery to the Work Integrated Learning (WIL) to Work program for international students. This new content was accessed by 343 students who completed the program in 2025. The WIL to Work program is designed to specifically support international students in preparing for WIL experiences in the workforce before they graduate. UTS has included a Modern Slavery awareness section into the Essential International Advice (EIA) session for international students during orientation. The information raises awareness to eradicating modern slavery, contact details for help, how to make a report and other contacts for advice and support. There is also a focus on managing risks for international students with a series of communications and social media posts on workplace rights and other issues to be aware of, such as recruitment scams.
Student welfare	UTS works with its student representative organisations to provide practical support and services that support student welfare. The UTS Student Association offers an ongoing free breakfast and dinner food services several times a week and a free Food Pantry on campus to assist students facing hardship and reduce financial stress. UTS Counselling Service provides ongoing counselling support and case management for local and international students. It assists students in accessing internal support (eg Financial Assistance for emergency housing) and external support (eg Red Cross and Anti-Slavery Australia) for potential issues such as servitude or forced marriage.
Legal services	The UTS Student Legal Service provides information about employment rights in a number of community languages for international students. It also provides free and confidential legal advice to any students that experience difficulties. In addition, ASA (based in the Faculty of Law) provides free, confidential legal and migration services to people who have experienced, or are at risk of modern slavery in Australia, including forced labour and forced marriage.

Our Business

Research Collaborations

UTS's external research partners are diverse and include a range of state, national and international organisations. UTS also engages a range of organisations that provide goods and services in support of our research projects. These organisations are engaged in line with UTS Procurement Guidelines. In the context of UTS research contracts, UTS standard agreements include Modern Slavery Terms.

International Collaborations

Activities where UTS operates beyond the borders of Australia may include:

- research collaborations
- research training opportunities
- teaching and learning
- academic arrangements that provide entry to UTS courses in Sydney, and
- provision of professional consultancy services.

The UTS Offshore Policy requires that all UTS offshore courses and activities comply with Australia's and the host country's relevant legal and regulatory requirements.

UTS offshore partners will usually be institutes of higher education with high educational reputations and academic standing. Any other partners must be of such an academic standing and reputation to satisfy the Vice-Chancellor that they are appropriate UTS offshore partners. Offshore partners can also include institutes that provide strategic connections but are not necessarily of high academic standing. Importantly, these partners must also align with UTS values and ethics. UTS also partners with organisations where offshore networks are of mutual benefit. All legal agreements and memoranda of understanding now reference UTS approach to preventing modern slavery.

UTS seeks to understand the policies and practices of our partners in relation to modern slavery. The due diligence and risk assessment processes assess all prospective domestic and international partners including:

- due diligence and opportunity and risk assessments evaluating the fit with UTS (both strategic and values-based), and
- considering any human rights, unethical or unfair activities performed by the potential partner.

Depending on the outcome of the initial risk assessment, such as where a prospective research partner may be considered a higher risk, external due diligence may be sought from an independent company that specialises in the area of research and geographical location. This process will help inform any decision, to either agree to or decline a partnership opportunity.

Appropriate academic and other relevant quality assurance standards and practices must also be met with respect to offshore activities delivered by UTS or its offshore partners.

Investments and Advancement

Under the [Treasury and Investments Policy](#), UTS recognises the definition of responsible investment that aligns with the United Nations Principles for Responsible Investment. ESG considerations are factored into the valuation of investments and the investment management process, to ensure consistency with UTS values.

The [UTS Philanthropic Fundraising Policy](#) addresses issues relating to modern slavery. This policy sets out the clear expectations of all staff across the university in undertaking fundraising activities. Prospective donors and philanthropic opportunities (proposal) are guided by Opportunity Assessment and Due Diligence Framework and reviewed through the Opportunity Assessment and Due Diligence Procedure (OA and DD Procedure), developed by UTS and the Advancement and Alumni Unit. This procedure incorporates a review of the donor's management of any risks of modern slavery in their operations and supply chain and compliance to submitting a Modern Slavery Statement, as required by legislation or as voluntarily reported.

In addition, the OA and DD Procedure reviews how the donors' funds were earned and their strategic and values alignment with UTS, including consideration of potential or actual breaches of human rights and / or unethical or unfair activities. Periodic review of existing donors' approach to management of any risks of modern slavery in their operations and supply chain, as well as updates to modern slavery statements, is also undertaken by the Advancement and Alumni Unit.

Research and policy advocacy

UTS is home to academics and research organisations which advance policy and advocacy on modern slavery in Australia. For example, ASA continues to advocate for a National Compensation Scheme for Survivors of Slavery.

In 2025 it continued its work in relation to changes to domestic legislation, such as the *Modern Slavery Act 2018 (Cth)* review. UTS Academics also continue to participate in podcasts and media events that promote the rights of migrant workers and raise awareness to important issues, such as unpaid wages compensation and other forms of workplace exploitation.

Policy, grievance mechanisms and reporting

UTS has a standalone [Modern Slavery Policy](#) that was approved by UTS Council in 2025. This policy provides clarity about our obligations and intentions related to preventing modern slavery in UTS operations and supply chains. Further, UTS has supporting policies which govern how UTS responds to modern slavery, such as the [UTS Code of Conduct](#) and [Procurement Policy](#).

In 2025, UTS adopted a new [Gender-based Violence Prevention and Response Policy](#) which includes reference to a range of forms of modern slavery including forced marriage, trafficking for the purpose of sexual exploitation, indecent assault, stalking and sexual assault. A new university wide approach to Gender Based Violence (GBV) has been implemented to support UTS's commitment to meeting its obligations under the National Higher Education Code to Prevent and Respond to Gender-Based Violence. This includes creating more consistent processes and a single reporting portal. The goal for these changes is to make it easier and safer for students, staff and others to seek support and report concerns on their own terms, including through making anonymous disclosures and / or reports.

The new processes reflect the UTS commitment to a trauma-informed, person-centred system that builds trust and ensures every concern is taken seriously. UTS safety caseworkers have also been employed to offer confidential support to staff and students who can help coordinate practical arrangements, such as safety and support planning.

These changes are supported through a new website – [Respect At UTS](#) – along with an increased focus on communications to UTS students and staff. Any disclosures or reports of modern slavery related to GBV will be included in report to UTS Council every 6 months, which will include de-identified data on incidents and any trends and will be notified to UTS Governance Committee and Audit and Risk Committee.

Further, UTS actively encourages the reporting of other concerns related to modern slavery. The university has a confidential reporting mechanism on its public website for staff, students and stakeholders to report any suspicions or incidents related to modern slavery. The [Speak up at UTS](#) webpage includes information about and links to [modern slavery](#) reporting. Individuals can also contact ModernSlaveryReporting@uts.edu.au.

Criterion 5: Assessing the effectiveness of actions taken

UTS is committed to continuous improvement in our efforts to combat modern slavery. These efforts include:

- annual risk assessment activities
- enhancing our approach to compliance for higher risk areas in our operations and supply chain
- development of risk mitigation strategies in line with the Risk Management Framework
- implementation of the stand-alone Modern Slavery Policy
- reviews of UTS Procurement Policies and Procedures practices
- reporting and review of student and staff complaints via Safety and Wellbeing Reports to UTS Council, as required by the Health and Safety Policy, and Student Complaints Resolution Office, in line with the Student Complaints Policy and Procedures
- ensuring students are aware that if they are dissatisfied with the resolution of a complaint made to UTS they have the right to request a review or appeal via the [National Student Ombudsman](#)
- the Modern Slavery Working Group monitoring completion of actions identified in our Modern Slavery Statements and other reporting activities
- documenting modern slavery continuous improvement achievements in our annual Statements.

UTS's 2024 Modern Slavery Statement identified priority actions to mitigate potential modern slavery risks across our key identified risk areas. These commitments were implemented throughout 2025 as indicated in our response to Criterion 4 above:

- determining appropriate risk thresholds for assurances around supplier performance and compliance with UTS Modern Slavery standards and policies
- reviewing and updating the training module for all supervisors and managers with financial delegation for procurement and purchasing

- cooperatively working with cleaning contractors in the CAF certification process to achieve the 3-Star Standard (once available) at the Moore Park Campus, and maintaining compliance CAF 3-star standard
- making modern slavery content available to international students via the WIL to work program
- further promoting the modern slavery policy adopted in 2025 across the UTS community
- continuing liaison with UTS Global Pty Ltd to raise awareness of modern slavery risks, the reporting requirements of the Act, informing them of the actions UTS is undertaking and provide them with updates on our progress
- reviewing current processes for disclosures and complaints related to modern slavery to ensure greater awareness of mechanisms for support and redress, and a more consistent, trauma informed approach to case management and reporting.

Priority action areas for 2026 have been identified as:

- The Modern Slavery Working Group will continue to lead a coordinated approach to identifying and addressing modern slavery risks across UTS operations and supply chain while ensuring compliance with Commonwealth and NSW modern slavery legislation.
- Continue to deliver communication and support initiatives as part of a broader anti-modern slavery engagement strategy.
- Raise awareness of supply chain risks through the Procurement Communities of Practice.
- Embed modern slavery training into the onboarding process for all staff involved in procurement and purchasing.
- Apply relevant risk mitigation actions following the review outcomes of the AUPN investigation into the medical gloves category of the medical consumable sector.
- Enhance the modern slavery training module for supervisors and managers with procurement and purchasing delegations to strengthen guidance on reducing modern slavery risk.
- Implement the updated Anti-Slavery Awareness course and promote it across UTS to encourage staff participation.
- Continue to engage with the CAF to certify additional campus buildings, prioritise investment and implement certification timelines.
- Explore with CAF if their awareness and training programs can be extended to the broader UTS workforce and implement as appropriate.
- Report all modern slavery disclosures related to GBV to UTS Council every six months, providing de-identified data on incidents, trends and notifying UTS Governance Committee and Audit and Risk Committee.
- Undertake targeted testing of key controls to assess their design and operational effectiveness, identify any gaps, and implement remediation actions to strengthen alignment with regulatory obligations.

Criterion 6: Consultation with entities owned or controlled by UTS

During 2025 consultation was undertaken with UTS's controlled entities listed below, to identify current and / or prospective activities which present modern slavery risks:

- UTS College
- UTS Global Pty Ltd, and
- UTS Beijing Ltd and UTS Research and Innovation Institute (Shenzhen) Co Ltd.

UTS Global

The Directors of UTS Global Pty Ltd, UTS Beijing Ltd and UTS Research and Innovation Institute (Shenzhen) Co Ltd, comprise of current UTS executives and staff who have been briefed on modern slavery risks. UTS Global Pty Ltd provides management and administrative services to the university related to UTS representative offices overseas.

Currently, UTS Global Pty Ltd provides services related to the strategic direction and management of a representative office in Beijing, China, UTS Beijing Ltd, which is a wholly foreign-owned entity of which UTS Global Pty Ltd is the only shareholder, which provides relationship management, market intelligence and profile-building services to UTS.

UTS Research and Innovation Institute (Shenzhen) Co Ltd

This was a wholly foreign-owned entity of which UTS Global Pty Ltd was the sole shareholder. It provided business development, technology transfer, consultancy and industry engagement services to UTS, particularly research-focused engagement. The company was wound up and deregistered in 2025 due to unfavourable shifts in the economic environment and a tightening of regulatory settings.

UTS College

UTS College continues to produce its own Modern Slavery Statement.

Vice-Chancellor's approval

This fifth Modern Slavery Statement provided by UTS is pursuant to Section 13 of the Modern Slavery Act 2018 (Cth) and was approved by University Council on Wednesday 17th June 2026.



Professor Andrew Parfitt

Vice-Chancellor

