



MONASH  
University

Modern Slavery  
ACT REPORT

REPORTING  
PERIOD  
JANUARY TO  
DECEMBER  
**2023**



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VC  
**FOREWORD**





A handwritten signature in black ink that reads "Sharon Pickering". The signature is fluid and cursive, with the first name "Sharon" written in a larger, more prominent script than the last name "Pickering".

**Professor Sharon Pickering**  
Vice-Chancellor and President

Monash University is committed to actively seeking out and addressing any potential instances of modern slavery – within our global operations, investments, and supply chains.

Our 2023 Modern Slavery Act Report is our fourth such report and represents a pivotal step towards enhancing transparency.

It stands upon the groundwork laid in preceding years and demonstrates Monash's unwavering and ongoing commitment to human rights and responsible business practices.

Our rolling five-year program (2023–2027) to continuously improve our processes now includes key themes that run across all years. It includes targeted actions each year to focus on addressing specific risks, as well as comprehensive risk assessments to identify areas of concern.

In many places around the world 2023 was a year of increased conflict. Beyond the profound human and environmental toll, these conflicts reverberated across global supply chains and shipping networks, creating significant challenges for the University.

In meeting these challenges, Monash was able to draw on our own academic expertise, our global supplier network, and our local knowledge cultivated across various countries. Additionally, we continued to draw strength from the Australian higher education sector, working collectively for the betterment of victims whose faces we may never see.

Monash's support for the United Nations' 17 Sustainable Development Goals, including the ending of modern slavery, is embedded in the University's *Impact 2030* strategy and is bolstered by our Environmental, Social and Governance reporting framework. They are integral to shaping our strategic decisions and informing our daily operational practices. We are committed to enhancing transparency across all our operations, investments, and supply chains, and to working diligently to identify and address any areas of concern.

This commitment serves as the bedrock for all our endeavours as we work together with our partners for a world where all individuals are liberated from exploitation and entitled to safe working conditions and fair treatment. Though we have made significant progress, we know there is still much to do. We are committed to reviewing and improving our supply chain and operations to assist in the drive to eradicate modern slavery.

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# ACKNOWLEDGEMENT OF COUNTRY



## **ACKNOWLEDGEMENT OF COUNTRY AND TRADITIONAL OWNERS**

MONASH UNIVERSITY recognises that its Australian campuses are located on the unceded lands of the people of the Kulin Nations, and pays its respects to their Elders, past and present.

Monash is committed to fostering a society that recognises, respects and includes Indigenous peoples, cultures and knowledge.

The University contributes to the creation of this society by working with and celebrating Aboriginal and Torres Strait Islander peoples, cultures and knowledge, as well as Indigenous peoples of other places where Monash has a campus or major presence.

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THE  
MONASH  
UNIVERSITY  
**PLAN**





## FIVE-YEAR PROGRAM

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

Program of Work	2023	2024	2025	2026	2027	2028
Assess additional entities for onboarding	World Mosquito Program Monash University, Indonesia	Assess additional entities for onboarding	Assess additional entities for onboarding	Assess additional entities for onboarding	Assess additional entities for onboarding	Assess additional entities for onboarding
Risk identification	Annual review	Annual review Onshore research and education	Annual review Offshore research and education Assess University's solar plans	Annual review Retail lease agreement – review of practices	Annual review Second review of procurement practices	Annual review
Supplier screening and monitoring	Onboarding assessment and tender questions Monitor supplier news articles	Onboarding assessment and tender questions Monitor supplier news articles	Onboarding assessment and tender questions Monitor supplier news articles	Onboarding assessment and tender questions Monitor supplier news articles	Onboarding assessment and tender questions Monitor supplier news articles	Onboarding assessment and tender questions Monitor supplier news articles
Risk mitigations	Offshore agreement and sourcing template updates Cleaning services Security services IT Apparel Solar	IT Apparel Continue offshore agreement and sourcing template updates	IT Apparel	IT Apparel	IT Apparel	IT Apparel
Training	New staff Key staff Expand offshore training rollout	New staff Key staff Expand offshore training rollout	New staff Key staff	New staff Key staff	New staff Key staff	New staff Key staff
Remediation	IT Apparel Solar	IT Other remediations as required Remediation framework planning	IT Other remediations as required Remediation framework planning	IT Other remediations as required	IT Other remediations as required	IT Other remediations as required

Program of Work	2023	2024	2025	2026	2027	2028
Policies and procedures	Operational framework	Procurement Policy		Incorporate an assessment of the quality of Modern Slavery Act reports for our investment managers	Review of human rights protections embedded in key policies, procedures and contracts	
Effectiveness monitoring	Expanded compliance monitoring  Assess report and planning structure	Continuous improvement – onshore	Continuous improvement – offshore	Continuous improvement  Review of IT hardware risk mitigation	Continuous improvement  Review of apparel risk mitigation  Review of cleaning services	Continuous improvement  Review of security services
Audit and compliance	Spot check modern slavery clauses used – onshore	Spot check modern slavery clauses used – onshore	Spot check modern slavery clauses used – offshore  Program review	Spot check modern slavery clauses used	Spot check modern slavery clauses used  Review of apparel risk mitigation	Spot check modern slavery clauses used
Reporting	ESG  Annual Modern Slavery Act Report	ESG  Annual Modern Slavery Act Report	ESG  Annual Modern Slavery Act Report	ESG  Annual Modern Slavery Act Report	ESG  Annual Modern Slavery Act Report	ESG  Annual Modern Slavery Act Report

## 2023 ACTION PLAN

Monash University has a five-year plan in place to increase the scope and depth of each subsequent annual Modern Slavery Act Report.

The five-year plan is a dynamic initiative which is expected to change and evolve as we learn and develop our approaches along with the actors in our supply chains.

### Lessons from the past year that have informed the remainder of our program include:

- At times it may not be possible to buy with certainty, and less than ideal purchasing outcomes may occur. These may be avoided in some instances through consideration of modern slavery risk earlier in the solution definition phase of a project, where alternate valid and lower-risk products and services may be able to be designed into the solution.



# KEY OUTCOMES FOR 2023

## IT FINAL ASSEMBLY FACTORIES ASSESSED WITH ELECTRONICS WATCH

**21** KNOWN ASSEMBLY  
FACTORIES IDENTIFIED

**12** FACTORIES IDENTIFIED  
WHERE VIOLATIONS HAVE  
OCCURRED

**8** FACTORIES AT RISK OF  
VIOLATIONS

**11** FACTORIES WHERE  
REMEDATION IS ONGOING

**1557** NEW SUPPLIERS  
ADDED THROUGH THE  
ONBOARDING PROCESS  
(100% KPI REACHED)

## TRAINING STATISTICS:

**3761** STAFF COMPLETED MODERN  
SLAVERY TRAINING IN 2023

**8923** TOTAL COMPLETIONS OF  
MODERN SLAVERY TRAINING  
TO DATE

**100%** KEY STAFF COMPLETED  
TRAINING

FEEDBACK PROVIDED TO  
THE ATTORNEY GENERAL'S  
DEPARTMENT ON MODERN  
SLAVERY LEGISLATION.

1. Electronics Watch is a leading not-for-profit that aims to improve human rights in the IT hardware industry.

Our five-year program continued to evolve throughout 2023 with the identification of new risks and new methods to reduce risk. Our program is now structured around common themes for each year, which is an improvement on our initial prioritised, task-based approach with the introduction of enhanced continuity of core themes across the program.

In this report, we refer to ‘modern slavery’ as defined by the Modern Slavery Act 2018 (Cth).

## PROCUREMENT

Staff involved in the procurement of goods and services remain at the front line of our efforts to reduce the risk of modern slavery. The team maintains an overall approach to learn and continuously improve.

### Training and awareness

- Staff new to procurement or purchasing roles are identified and scheduled for mandatory modern slavery training.
- This year, our training expanded to Monash University, Malaysia, Monash University, Indonesia and World Mosquito Program staff.
- For modern slavery training, key staff are defined as senior executive roles, and staff that have been identified as having material commercial or purchasing components in their role.
- Our Key Performance Indicator (KPI) for staff working in these areas is 100 per cent and we reached 100 per cent of new staff completing their training.
- A communications plan was developed by the University Marketing, Admissions and Communications (UMAC) team, which helped deliver a variety of internal and external digital communications.
- The University’s Modern Slavery website was updated and maintained.

### Procurement process

- In 2023, 1557 new suppliers were onboarded through our gating process to identify and require manual handling of non-compliance.
- Our KPI for onboarding suppliers through this gate is 100 per cent, and we reached our target of 100 per cent of these new suppliers being onboarded via the mandatory gate. By design, this process does not apply to all suppliers as it excludes low-value and one-time suppliers, including staff who are engaged for exam invigilation outside of their regular employment.

- Our work with Electronics Watch to reduce the risk for new IT hardware continues to be highly beneficial. It includes the early identification of higher-risk products or factories, often prior to making purchasing decisions.
- As part of expanded compliance monitoring, Monash College undertook a review of recruitment, onboarding and retention against best practice. Five low-risk improvement recommendations were accepted for implementation in 2024 which will be managed by Monash College. Catering services used by the College were reviewed with a preferred provider list created. Those on the preferred provider list were assessed as having a low risk of modern slavery occurring within their business.
- Monash University, Malaysia, The World Mosquito Program and Monash University, Indonesia identified key staff, who were enrolled and then completed their modern slavery training.
- Monash College’s offshore partner annual review process and staff recruitment audit were deferred until 2024 due to operational changes at Monash College in 2023.

## INTERNAL ASSESSMENT

### Cleaning services

A significant tender for high-risk cleaning services was undertaken throughout most of 2023. The University's cleaning requirements for its Australian campuses and locations comprise one of the largest consolidated cleaning services programs in the country.

A case study on our approach to our cleaning services and the risk of modern slavery can be found later in this document.

### Solar panels

In 2023, the University concluded its strategic solar deployment across its existing buildings and campuses. The University will continue to assess future opportunities for solar deployment.

Additional information on solar panels can be found later in this document.

### Apparel

Apparel purchases are common across Monash entities and therefore present an opportunity to further reduce the risk of modern slavery in the University's supply chains.

Work was undertaken to interview key existing suppliers and to review any third-party certifications that relate to modern slavery in their operations and supply chains.

A variety of certifications were obtained, comprising self-certifications, lesser-known certifications and third-party certifications.

A new commercial approach to apparel will be undertaken in 2024 which will be designed to reduce risk. This is expected to include the execution of new supplier agreements and the development of supporting policies, processes and/or procedures to limit apparel purchases to a pre-approved panel of suppliers. Pre-approved suppliers will be limited to those that can demonstrate robust approaches to identifying, preventing and mitigating modern slavery and other human rights risks.

### IT hardware

Our ongoing work with Electronics Watch has led to significant improvements in the transparency of our IT hardware supply chain, which assists in identifying the potential occurrence of modern slavery. Our eSolutions team has worked to further integrate the benefits of our affiliation into our purchasing practices.

A case study on IT hardware can be found later in this document.

## ASSESSMENT OF OFFSHORE ENTITIES

Work continues to complete the onboarding of Monash University, Indonesia and the World Mosquito Program. Each entity has unique requirements which have been discovered during the onboarding process. The onboarding program tailors our approach to suit each entity and integrates their requirements into our modern slavery reduction and elimination program.

The discovery exercise in 2023 identified several areas that vary across entities, including:

- formal engagement of the entity in order to discuss agreements
- local processes and procedures
- how legal support is obtained
- local laws and customs
- local agreement types and templates
- goods and services purchased
- specific high-risk local industries
- high-risk imported goods specific to their country.

The discovery exercise provided the information required to plan to address each area in a manner that supports each entity, their local laws, customs and practices.

## COMPLIANCE MONITORING

KPIs are used to measure key areas of progress for compliance.

### Compliance audit: Contract terms and integration of entities into the program.

The Risk and Compliance Unit conducted an audit with the assistance of the Office of the General Counsel. Four recent Monash University Australia products and services agreements (three high-risk, one low-risk) were checked to identify whether suitable modern slavery terms were in place. Checks of the overall status of each entity and the modern slavery reduction and elimination program were also undertaken to identify areas for improvement.

#### Summary of findings:

All four agreements were found to have the correct modern slavery terms. Both high-risk and low-risk standard terms refer to the United Nation's Guiding Principles on Business and Human Rights. High-risk terms include the right to audit via a business or factory inspection. A compliance checklist was provided to offshore entities to which they submitted responses. Compliance checklists were informed by the Modern Slavery Act 2018 (Cth).

- **Monash College** is part of both the Working Group and Steering Committee. They have processes and policies in place and undertake due diligence on new suppliers. Monash College also produces an annual modern slavery compliance statement approved by its Board. An opportunity has been identified to include control testing and an assurance process to assess the effectiveness of measures and compliance with the University's modern slavery policies. This will be discussed with the Steering Committee and will be factored into the five-year rolling modern slavery reduction and elimination program if deemed appropriate.
- **Monash University, Malaysia** is in the process of aligning its various practices with Monash University Australia's modern slavery programs and practices. Local law does not currently require the Malaysia campus to report on modern slavery. Recruitment practices comply with local laws. In some instances, Monash University, Malaysia strives to work beyond local minimums, such as replacing 2x12-hour security shifts with 3x8-hour shifts. An Occupational Health, Safety and Wellbeing (OHSW) Committee promotes safe and healthy work environments. No coercion, threats or deceptive practices are tolerated. Monash University, Malaysia has representatives on the Modern Slavery Steering Committee and Working Group, and has identified that assistance may be required to uplift certain practices, including sourcing and supplier relationships.

Additional work will be undertaken to define areas for improvement in more detail, and to include addressing them in the works plan.

- **Monash University, Indonesia** undertakes background checks on suppliers. Many suppliers are recommendations received from Monash University Australia. Monash University, Indonesia has a representative on the Modern Slavery Steering Committee. The Indonesia campus is being onboarded and will require assistance in understanding the risks of their current practices and supply chain, and controls to mitigate risk. This is to be expected for an entity at this stage of onboarding.
- **World Mosquito Program** follows Monash University Australia's HR, OHSW and procurement policies and procedures. The World Mosquito Program is undergoing the onboarding process and has representation on both the Steering Committee and Working Group.
- **Monash Suzhou** follows Monash University Australia's HR, OHSW, and procurement policies and procedures, adjusted for local laws as required. The Suzhou campus will commence onboarding soon. It has been identified that training is required to assist staff in identifying risks. Future contracts will need to have clauses updated with modern slavery terms. Supplier checklists or other vetting processes will be needed to assess suppliers. A Working Group representative will be sought once Monash Suzhou has been officially engaged to commence onboarding.

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# ABOUT THIS REPORT





Modern slavery is a pervasive problem that requires robust solutions based on collective action to generate change in global practice. As part of the global community, Monash University recognises that we play an important role in helping eliminate exploitative labour practices.

Modern slavery refers to situations where threats, coercion or deception are used to undermine one's freedom and to inflict exploitation. These practices can include human trafficking, slavery, debt bondage, forced labour, the worst forms of child labour, domestic servitude and forced marriage.

The victims of modern slavery worldwide are estimated to number 50 million people daily—nearly one in every 150 people. A total of 28 million victims are in forced labour on any given day, including 12 million children<sup>1</sup>. These numbers have grown since the International Labour Organisation's 2022 report. An estimated 41,000 people are victims of modern slavery within Australia and Australian high-risk imports total \$26 billion per year<sup>2</sup>.

The following ongoing employment challenges continued globally in 2023:

- » Gig economy roles often provide limited job or income certainty, limited future career opportunities, and the transfer of risks and cost to workers.
- » The common hiring of staff as independent contractors when the nature and duration of their role would normally be considered as full-time employment. In Australia, areas other than risk transfer to the contractor, such as superannuation contributions, may be impacted to their future detriment.

The University recognises that the precarious nature of these roles may put pressure on vulnerable workers to accept sub-standard roles and increase the risk of modern slavery.

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

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

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

**This report was approved by Monash University Council in its capacity as principal governing body of Monash University, on 19 June 2024. Vice-Chancellor and President, Professor Sharon Pickering, is the responsible member.**

## OUR COMMITMENT

We are committed to actively contribute to a future without labour exploitation and human rights violations.

Monash University supports human rights within its operations and supply chain in full compliance with the Act. This is supported by an **Environmental, Social and Governance Statement 2021–2025**, and an endorsed five-year program of reduction and elimination of modern slavery. This program is also supported as part of Monash University's **sustainable development framework**.

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

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

This report outlines the actions taken by Monash University in relation to identifying and mitigating modern slavery risks within its operations and supply chain.

Although we located no specific instances of modern slavery in 2023, we have increased transparency in our electronics supply chain and identified specific issues and concerns that we continue to work on as part of our Electronics Watch affiliation. We continue to improve our program to identify and mitigate risks of the occurrence of modern slavery.

1.  **International Labour Organisation Global Estimates of Modern Slavery**, viewed 20 December 2022.

2.  **International Labour Organisation Global Estimates of Modern Slavery**, viewed 2 March 2024.

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# ABOUT OUR UNIVERSITY



## SUMMARY AND KEY STATISTICS

Monash University is a modern, global, research-intensive university, delivering education and research excellence in Australia and across the world with nine campuses and locations across six countries, two campus partnerships, and more than 100 partner universities.

Our strategic plan, *Impact 2030*, charts the path towards realising our purpose through research and education to address the challenges of the age—climate change, geopolitical security and thriving communities—for the betterment of present and future generations.



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THE UNIVERSITY'S  
**STRUCTURE,**  
**OPERATIONS AND**  
**SUPPLY CHAIN**



## STRUCTURE

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

The principal governing body of the University is the Monash University Council, chaired by the Chancellor, Mr Simon McKeon AO.

### CHANCELLOR (EX-OFFICIO)

#### Mr Simon McKeon AO

BCom LLB *Melb*, HonDPH *La Trobe* FAICD

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

### PRESIDENT AND VICE-CHANCELLOR (EX-OFFICIO) (RESIGNED 4 AUGUST 2023)

#### Professor Margaret Gardner AC

BEcon(Hons) PhD *Syd*, DUniv *Griffith* FASSA FAIM FAICD

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

### INTERIM PRESIDENT AND VICE-CHANCELLOR (EX-OFFICIO) (COMMENCED 5 AUGUST 2023)

#### Professor Susan Elliott AM

MBBS, MD *Melb*, FRACP

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

### PRESIDENT OF THE ACADEMIC BOARD (EX-OFFICIO)

#### Professor Robert Brooks

BEc(Hons) PhD *Monash*

Committees of Council membership: Honorary Degrees Committee

### APPOINTED COUNCILLORS

#### Mrs Pitsa Binnion PSM

BA Dip Ed, MACE

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

#### Professor Gill Callister PSM

BSW(Hons) BA

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

#### Dr Megan Clark AC

Deputy Chancellor

BSc(Hons) PhD FATSE FAICD FAusIMM

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

### The Hon Simon Crean (until 25 June 2023)

Deputy Chancellor

BEC LLB HonDLitt *Deakin*

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

#### Ms Geraldine Johns-Putra

BEC LLB(Hons) *Monash* LLM *Melb*

Committees of Council membership: ESG and Estates Committee (Chair from 18 July 2023), Audit and Risk Committee, Honorary Degrees Committee

#### Mr Peter Marriott

BEC(Hons) *Monash* FCA MAICD

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

#### Ms Jennifer Samms

BEC *Monash*

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

#### Mr John Simpson AM

Deputy Chancellor (from 7 December 2023)

BA *Melb* FCSG MAICD

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

### The Hon Peter Young AM KC

Deputy Chancellor

BJuris LLB *Monash*

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

### STAFF-ELECTED COUNCIL MEMBERS

#### Associate Professor Tui McKeown

BA(Hons), MA, PhD *Monash*

Committees of Council membership: ESG and Estates Committee

### STUDENT-ELECTED COUNCIL MEMBERS

#### Ms Ishka de Silva

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

### SECRETARY TO COUNCIL

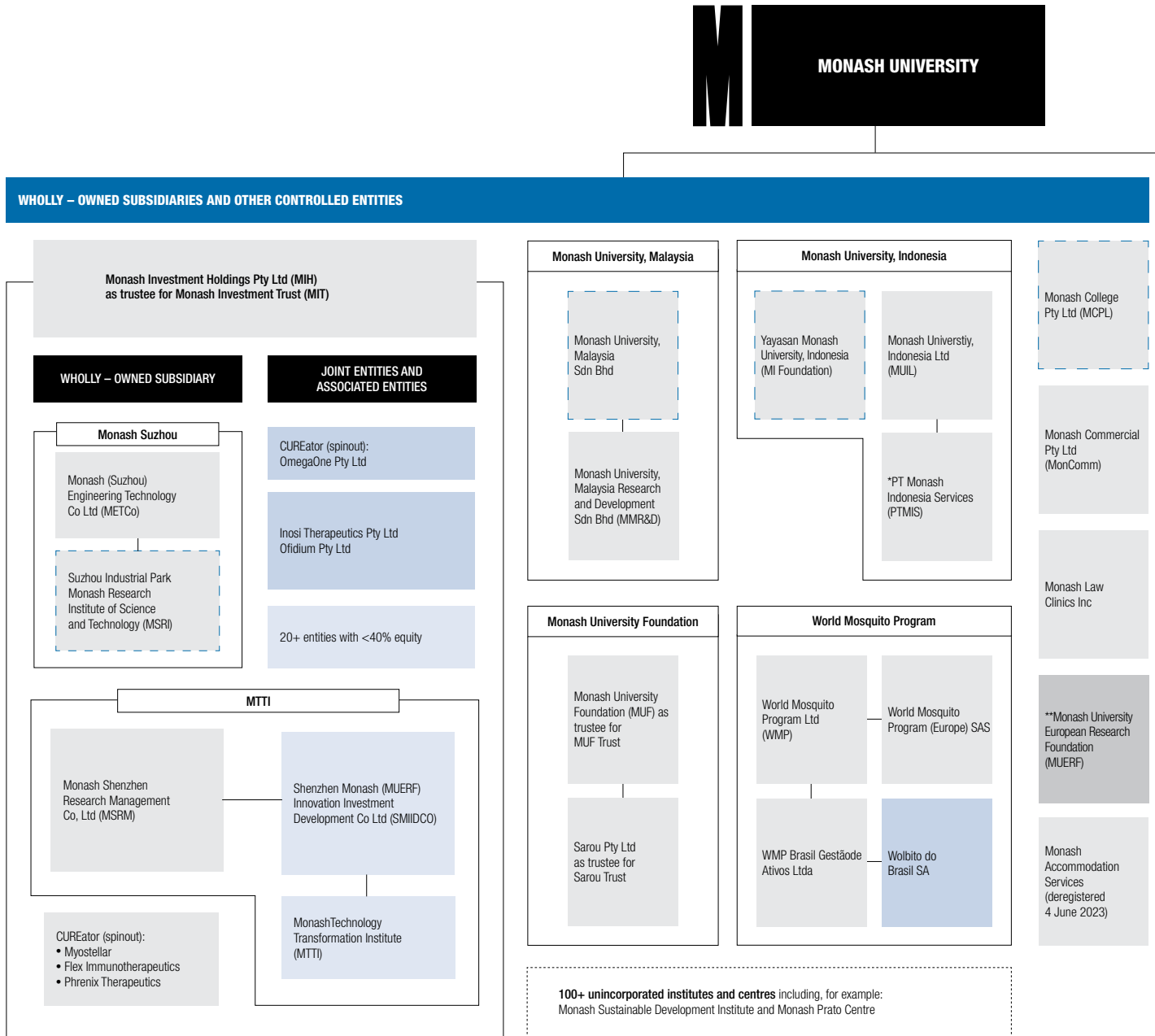
#### Mr Richard Long

\*Noting that The Hon Simon Crean sadly passed away on 25 June 2023.

## OVERALL GOVERNANCE AND MANAGEMENT

### MONASH GROUP STRUCTURE

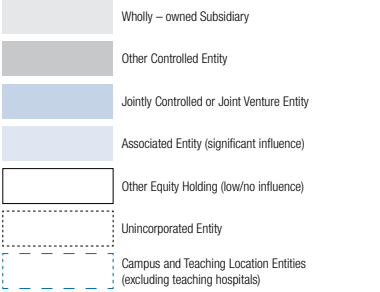
As at 7 December 2023



**JOINT ENTITIES, ASSOCIATED ENTITIES AND OTHER EQUITY HOLDINGS**



**LEGEND**



## REPORTING ENTITIES

The Act requires Monash University to report on all its controlled entities. Due to the size, complexity and geographic diversity of the University's global supply chains and operations, a staged approach has been used to prioritise the deep assessment of entities through our operational framework. Over subsequent years, additional entities will be included as we progress down the entity priority list.

### Prioritisation of entities (high to low):

- a. All entities that would independently qualify to report under the Act, as they are Australia-based and have more than \$100 million in revenue: Monash University, Monash University Foundation Pty Ltd, and Monash College Pty Ltd (qualified in 2021).
- b. All entities located offshore with more than \$100 million in revenue: Monash University, Malaysia Sdn Bhd.
- c. Other entities by revenue, operational size or risk—in the order determined by the Modern Slavery Steering Committee.

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

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

## OPERATIONS

Monash University has four campuses in Victoria, Australia, as well as international campuses and learning centres in Malaysia, China, India, Italy and Indonesia.

The University's core activities are education and research. Due to Monash's size and global presence, these are supported by a wide range of student services, global campuses, learning centres and research activities.

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

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

Monash College is a wholly owned company of Monash University, a registered charity with the Australian Charities and Not-for-profits Commission, and a higher education provider accredited by the Tertiary Education Quality and Standards Agency. Monash College is located in Melbourne, Australia.

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

## ACADEMIC STRUCTURE

### FACULTIES

1. Faculty of Art, Design and Architecture
2. Faculty of Arts
3. Faculty of Business and Economics
4. Faculty of Education
5. Faculty of Engineering
6. Faculty of Information Technology
7. Faculty of Law
8. Faculty of Medicine, Nursing and Health Sciences
9. Faculty of Pharmacy and Pharmaceutical Sciences
10. Faculty of Science.

## OPERATIONAL STRUCTURE

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

### Senior Executive portfolios

- Vice-Chancellor and President
- Provost and Senior Vice-President
- Deputy Vice-Chancellor (Enterprise and Engagement) and Senior Vice-President
- Deputy Vice-Chancellor (Education) and Senior Vice-President
- Deputy Vice-Chancellor (Research) and Senior Vice-President
- Chief Operating Officer and Senior Vice-President
- Chief Financial Officer and Senior Vice-President.



**Monash University,^ ABN 12 377 614 012**

ENTITY NAME	JURISDICTION OF REGISTRATION
<b>Campuses</b>	
Monash University, Malaysia Sdn Bhd, ^199801002475 (458601-U) > Monash University, Malaysia Research and Development Sdn Bhd	Malaysia
Monash University, Indonesia Foundation (Yayasan Monash University, Indonesia) ^(NIB) 1211000643608, PT Monash Indonesia Services*, ^(NIB) 1281001461563	Indonesia
<b>Other</b>	
Monash Accommodation Services Pty Ltd, ABN 34 103 317 826 – deregistered June 2023	Australia
Monash College Pty Ltd, ^ABN 64 064 031 714	Australia
Monash Commercial Pty Ltd, ABN 14 095 891 722	Australia
Monash Investment Holdings Pty Ltd > Monash Investment Trust, Australia > Monash Shenzhen Research Management Co Ltd, China, 91440300MA5FLX6Y0L > Monash (Suzhou) Engineering Technology Co Ltd, China > Ofidium Pty Ltd, Australia > Suzhou Industrial Park Monash Research Institute of Science and Technology, China > Myostellar Pty Ltd > Flex Immunotherapeutics Pty Ltd > Phrenix Therapeutics Pty Ltd	Australia
Monash University, Indonesia Ltd, ^ACN 610 548 144	Australia
Monash University Foundation Pty Ltd, ^ABN 94 178 965 125	Australia
World Mosquito Program Ltd, ^ACN 654 255 455 > World Mosquito Program Europe, France, SAS^ – SIREN 908 337 553 > WMP Brasil Gestão de Ativos Ltda, Brazil	Australia
Monash University European Research Foundation ETS**	Italy

^ Entities which have been either completely or partially onboarded.

\*PT Monash Indonesia Services has two shareholders: Monash University and Monash University, Indonesia Limited.

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

## SUPPLY CHAIN

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

Analysis was undertaken of detailed purchase order data for the 2023 reporting year.

In 2023, Monash purchased from 15,174 suppliers in 63 countries including the following countries identified as high-risk: Afghanistan, Bangladesh, Cambodia, China, India, Laos, Malaysia, Pakistan, Sri Lanka, Thailand and Vietnam. Of these suppliers, 1557 were new suppliers that were onboarded using the new mandatory modern slavery onboarding process. This number excludes low-value and one-time suppliers.

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## SPEND AND INVESTMENTS



**Monash University spend**

**IN 2023,  
MONASH UNIVERSITY SPENT**

**\$1.23B**

with its suppliers of goods and services. Of this, \$359 million was spent with non-profits such as hospitals, universities and medical research institutes.

**The largest categories of spend were:**

- Construction, buildings and grounds
- Corporate professional services
- IT professional services.



**Monash University investments**

**IN 2023,  
MONASH UNIVERSITY'S  
CONSOLIDATED INVESTMENTS TOTAL**

**\$1.9B**

(including Monash University Foundation).

**The largest areas of investment were:**

- Term deposits
- Australian and international equities
- Core fixed interest
- Alternative debt
- Investment properties.

## SPEND AND INVESTMENTS



Monash University, Malaysia spend

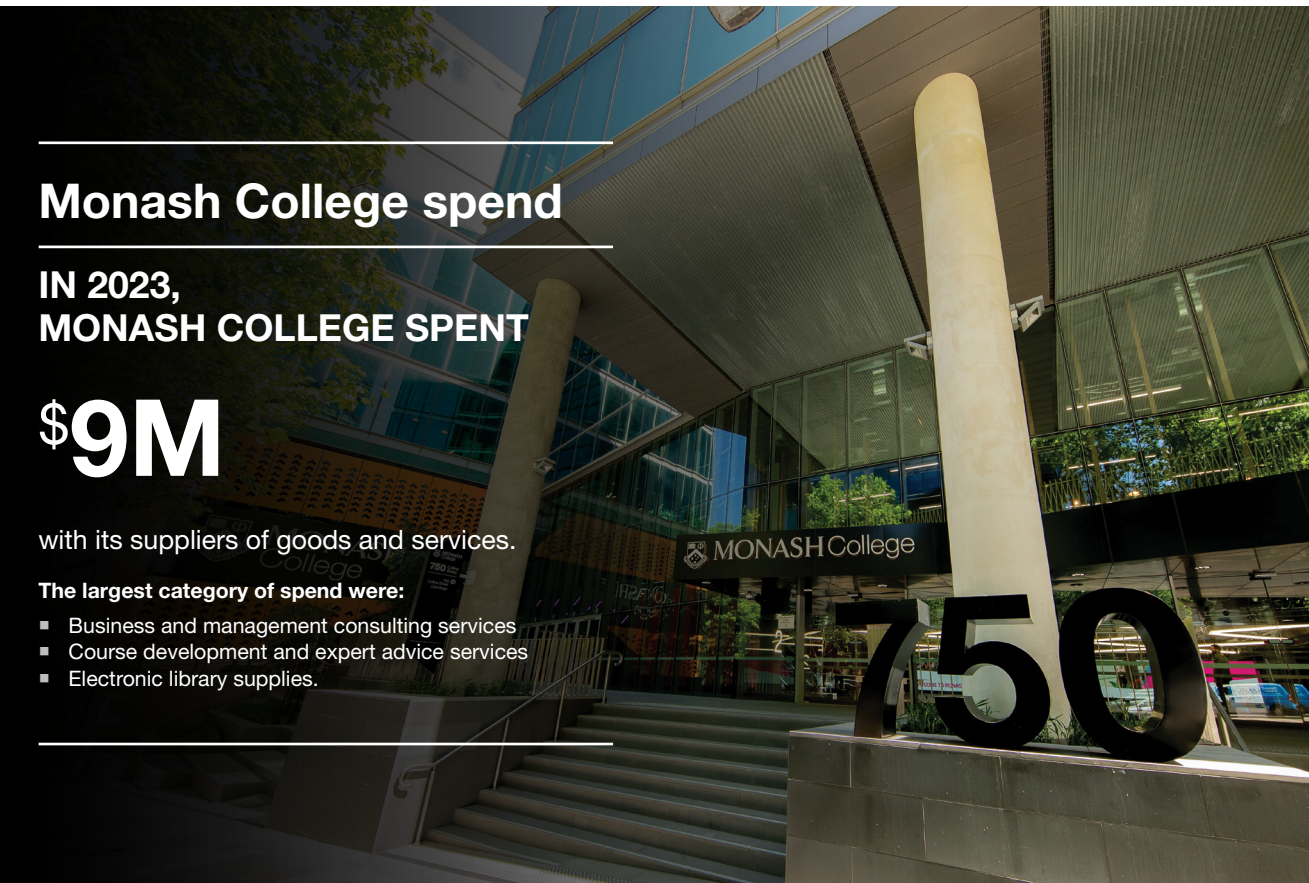
IN 2023,  
MONASH UNIVERSITY, MALAYSIA SPENT

**\$24.7M**

with its suppliers of goods and services.

The largest categories of spend were:

- Research equipment
- Refurbishment works
- AV hardware
- IT software.



Monash College spend

IN 2023,  
MONASH COLLEGE SPENT

**\$9M**

with its suppliers of goods and services.

The largest category of spend were:

- Business and management consulting services
- Course development and expert advice services
- Electronic library supplies.



**Monash University, Indonesia spend**

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**IN 2023,  
MONASH UNIVERSITY, INDONESIA SPENT**

**\$0.47M**

with its suppliers of goods and services.

The largest categories of spend were:

- IT
- Advertising
- Facilities management.

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**World Mosquito Program spend**

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**IN 2023,  
THE WORLD MOSQUITO PROGRAM SPENT**

**\$16.8M**

with its suppliers of goods and services.

The largest category of spend were:

- Contractors
- Travel
- IT.

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ENVIRONMENTAL,  
SOCIAL AND  
GOVERNANCE  
**COMMITMENTS**



In the pursuit of excellence in sustainability, the University has an **Environmental, Social and Governance Statement 2021–2025** approved by the University Council in 2021. The University also has a **sustainable development framework** in place.

The modern slavery program of work has been integrated into these two initiatives to facilitate a cohesive approach to the critical issues of global sustainability and modern slavery. Progress updates are now provided to the ESG project.

Protecting and promoting human rights is integral to Monash University, and requires a broad framework to cover both operations and our supply chains.

**Our commitment to the United Nation’s (UN) Sustainable Development Goals includes that we will:**

- support and promote the principles of the Sustainable Development Goals
- undertake research that provides solutions to sustainable development challenges
- provide the educational opportunity for our students to acquire the knowledge and skills needed to promote sustainable development
- contribute to the achievement of the Sustainable Development Goals by ensuring our campuses and major programs are environmentally sustainable and socially inclusive
- report on our activities in support of the Sustainable Development Goals.



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# MODERN SLAVERY GOVERNANCE STRUCTURE

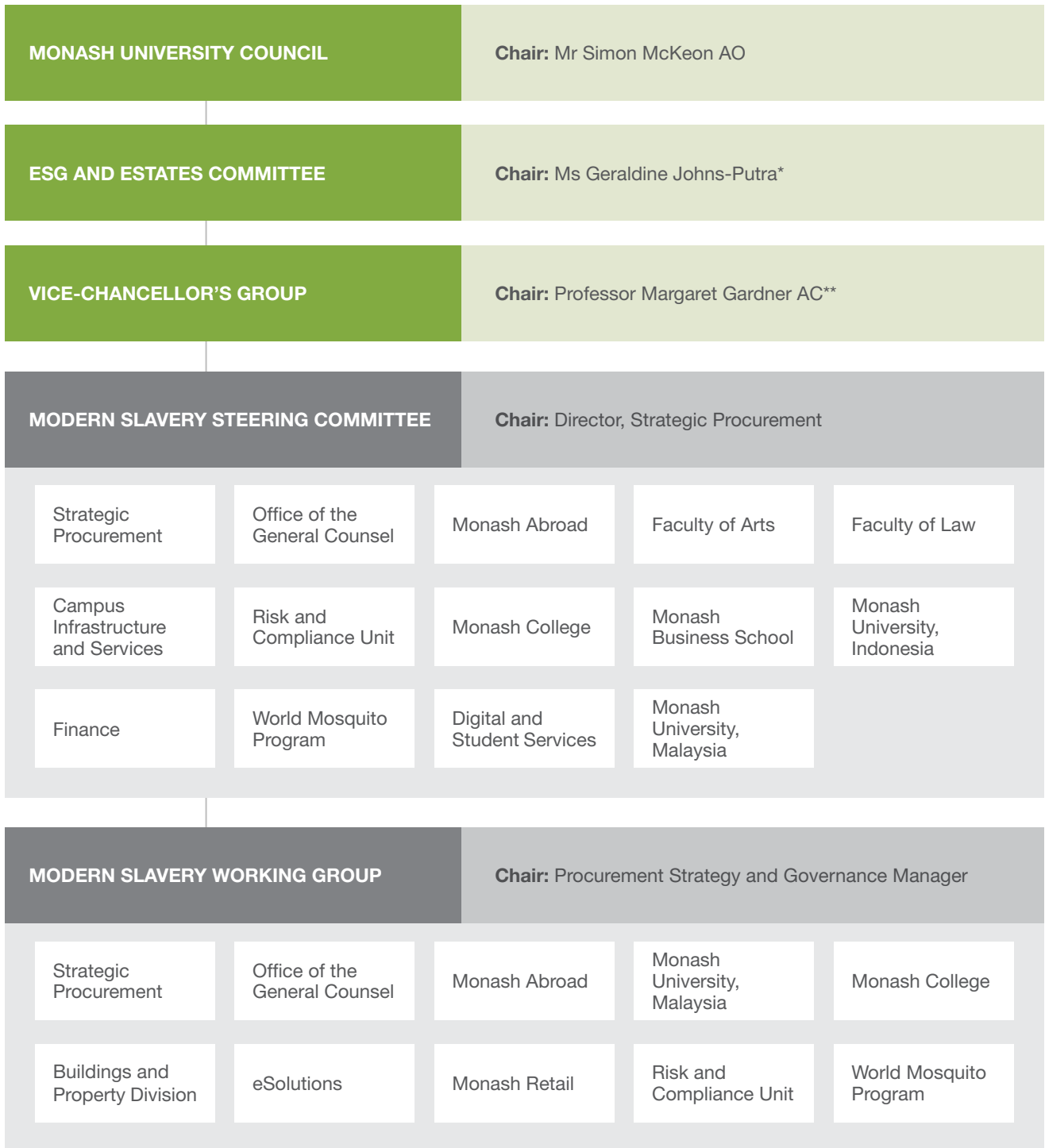




Monash has a clearly defined governance structure supported by an expert advisory panel to oversee the development and implementation of the modern slavery program of work.

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

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



\*Noting that The Hon Simon Crean held the position initially in 2023, and sadly passed away on 25 June 2023.

\*\*Professor Sharon Pickering was appointed as Vice Chancellor on 29 January 2024.

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IDENTIFYING  
RISKS IN OUR  
**OPERATIONS AND  
SUPPLY CHAIN**



With large-scale and global operations amounting to more than \$2 billion in investment portfolios and cash equivalents, and more than \$1 billion in annual spend with suppliers, Monash acknowledges there is a risk of it unknowingly facilitating, contributing to or being associated with modern slavery in its operations and supply chains, whether directly or indirectly.

## RISK IN OPERATIONS

Monash University's operations cater to over 84,000 students, supported by over 18,000 staff across six countries. Each country has specific labour practice laws and obligations. At-risk groups, both domestically and overseas, include vulnerable populations as a result of job insecurity, economic hardship, cultural practices, literacy and language issues, or the lack of knowledge about local laws. Any of these can contribute to increased risk of exploitation.

The following points represent two key operational risks for Monash.

### Recruitment practices for both staff and students

- Monash University works to ensure all recruitment activities actively avoid risks for staff and students (including international students) in relation to servitude, forced labour, debt bondage in a homestay environment, and in their search for employment. Monash University has developed policies, processes and monitoring to identify and avoid such risks. Monash is satisfied that our current set of relevant Human Resources (HR) policies, procedures and student services programs are addressing these risks.

### Procurement practices

- Monash recognises our operations can impact our direct suppliers with potential flow-on effects to downstream suppliers that may in turn facilitate or incentivise modern slavery practices such as forced labour, debt bondage, and slavery.
- This supply chain influence as a result of operations arises from:
  - » planned or unplanned business drivers such as last-minute purchasing or unexpected demand placing undue pressure on the market
  - » internal stakeholder requirements or expectations
  - » procurement practices including contract terms, negotiated pricing, and requested tender response or delivery timeframes.

These may drive counterproductive behaviours or expectations across the University, including:

- » setting unreasonable delivery or response timeframes
- » acceptance of, or actively seeking, unreasonable below-market pricing
- » seeking unreasonably high investment returns
- » investing or purchasing from known high-risk industries or countries without relevant due diligence
- » the acceptance of ambiguous responses to modern slavery information requests in tenders
- » the acceptance of multi-level subcontracting without sufficient due diligence.

Any of these operational practices may indirectly increase the risk of illegal or unsustainable business practices, including labour exploitation, in order to satisfy demand created by the University.

These risks will be assessed in 2024 and where required will be addressed through education and changes to policies and processes. Our online modern slavery training module includes examples of some of these issues.

INSIGHTS INTO OUR WORKFORCE

Table 13: Workforce disclosures (December 2022–December 2023)

	DECEMBER 2023										DECEMBER 2022										
	ALL EMPLOYEES					ONGOING					FIXED TERM					CASUAL					
	NUMBER	FTE	FULL	PART	FTE	NUMBER	FTE	NUMBER	FTE	NUMBER	FTE	NUMBER	FTE	NUMBER	FTE	NUMBER	FTE	NUMBER	FTE		
<b>GENDER</b>																					
Women Executives	10	10	1	–	1	9	9	9	–	–	8	8	–	–	8	8	–	–	–	–	
Women (total staff)	6164	5095	2313	604	2733	2250	1915	446	5916	4849	2109	2508	1876	1010	465						
Men Executives	12	12	2	–	2	10	10	–	11	11	2	–	–	9	9	–	–	–	–	–	
Men (total staff)	4293	3718	1861	122	1933	1694	1483	301	4203	3650	1726	1793	1499	679	357						
Self-described Executives	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	
Self-described (total staff)	18	16	6	–	6	8	8	2	17	13	5	1	6	5	2						
<b>AGE</b>																					
15-24	602	364	61	2	62	111	96	205	630	388	34	2	35	97	82	487	251				
25-34	2443	1977	651	70	700	1098	987	289	2952	1932	575	70	623	1096	1006	611	303				
35-44	3161	2797	1320	285	1518	1329	1171	108	3086	2702	1225	279	1422	1342	1170	240	109				
45-54	2402	2131	1232	215	1377	787	674	80	2230	2022	1132	195	1268	794	671	169	83				
55-64	1455	1264	756	118	835	477	387	42	1395	1216	729	106	795	443	367	117	54				
Over 64	412	295	160	36	180	150	91	24	383	272	145	35	165	143	85	60	23				
<b>Total employees</b>	<b>10,475</b>	<b>8828</b>	<b>4180</b>	<b>726</b>	<b>4672</b>	<b>3952</b>	<b>3407</b>	<b>749</b>	<b>10,136</b>	<b>8512</b>	<b>3840</b>	<b>687</b>	<b>4307</b>	<b>3915</b>	<b>3391</b>	<b>1694</b>	<b>824</b>				

NOTES

1. Last pay period date: 2022–16 December 2022 and 2023–12 December 2023
2. Dataset includes active paid staff members as at the last pay period date (Monash University Australia payroll staff only).
3. Staff on unpaid leave have been excluded from the dataset.
4. Active casual/sessional staff members who did not work have been excluded from the dataset.
5. Workforce figures are derived based on the Department of Jobs, Skills, Industry and Regions definition, which requires active staff numbers for the relevant pay period of the year. This may result in discrepancy in workforce figures across the year.
6. There are minor variations to 2022 reporting with the implementation of an enhanced HR reporting system and the retrospective submission of timesheets.
7. All roles covered by our enterprise agreements have been classified consistently with the Monash Enterprise Agreement (Academic and Professional Staff) 2019, the Monash University Enterprise Agreement (Trades and Services Staff – Building and Metal Trades Staff) 2009 and the Monash University Enterprise Agreement (Trades and Services Staff-Catering and Retail, Cleaning and Caretaking and Miscellaneous Services Staff) 2005. We have a suite of policies and procedures that govern recruitment, selection and employment. These are consistent with employment standards and provide for transparent operational governance, fair treatment and a commitment to a culture of integrity and professionalism, with equity, diversity and inclusion being key pillars of these policies and procedures.

## INSIGHTS INTO OUR WORKFORCE

**Table 7: Student enrolment in Australia (headcount) by attendance type and coordinating campus: 2019–2023 data**

CAMPUS	STUDENT ATTENDANCE TYPE	2019	2020	2021	2022	2023
Caulfield	Full-time	19,727	16,757	15,042	13,550	13,860
	Part-time	2123	2314	2317	2617	2328
<b>Sub-total</b>		<b>21,850</b>	<b>19,071</b>	<b>17,359</b>	<b>16,167</b>	<b>16,188</b>
Clayton	Full-time	37,312	38,941	40,405	35,956	37,783
	Part-time	8967	10,184	12,040	13,573	13,912
<b>Sub-total</b>		<b>46,279</b>	<b>49,125</b>	<b>52,445</b>	<b>49,529</b>	<b>51,969</b>
Gippsland	Full-time	385	398	394	402	395
	Part-time	9	4	2	1	1
<b>Sub-total</b>		<b>394</b>	<b>402</b>	<b>396</b>	<b>403</b>	<b>396</b>
Parkville	Full-time	1437	1436	1600	1692	1967
	Part-time	627	595	539	556	537
<b>Sub – total</b>		<b>2064</b>	<b>2031</b>	<b>2139</b>	<b>2248</b>	<b>2504</b>
Peninsula	Full-time	3731	3659	3519	3222	3242
	Part-time	661	632	716	783	856
<b>Sub-total</b>		<b>4392</b>	<b>4291</b>	<b>4235</b>	<b>4005</b>	<b>4098</b>
<b>Total*</b>		<b>74,979</b>	<b>74,920</b>	<b>76,574</b>	<b>72,352</b>	<b>74,881</b>

**NOTES:**

- > 2023 data are preliminary as of 31 January 2024 and subject to government verification process
- > Does not include students enrolled on overseas campuses or offshore partners
- > The University transferred its Gippsland campus to become part of Federation University Australia on 1 January 2014. We ceased making offers to new students and have made arrangements with Federation University Australia regarding teaching its continuing students. One Monash offering – the MBBS medicine course – continues to admit Monash students at Gippsland.

## RISK IN SUPPLY CHAIN

Monash University communicates clearly about modern slavery risks, expectations and requirements with its high-risk supply chains.

The University engages with a mix of resellers, head contractors and direct providers in our procurement of goods, services and works. Depending on the nature of the procurement and its associated supply chain, Monash may contribute or be directly linked to modern slavery risks.

Supply chains involving multiple layers of international suppliers inherently carry higher risks and can include various forms of modern slavery practices depending on the type of industry, raw materials, components and the countries involved in supply and processing.

For goods procurement and construction in particular, the risks of modern slavery are often hidden in the supply chain, potentially one or more steps beyond the University's visibility into it. While Monash may be indirectly linked to the risks that exist at the raw material and/or manufacturing levels, our ability to identify our risks may be restricted by purchasing those products through a reseller or head contractor.

Where the supply chains are shorter and predominantly based in the countries in which we operate, Monash may be better placed to minimise our contribution to modern slavery risks through responsible procurement practices, education and contract management.

Where the delivery of goods, services and investment outcomes includes the use of both direct and downstream labour from vulnerable communities, any exploitative practices in the engagement of that labour by third parties or their downstream suppliers may be indirectly attributable to the demand created for goods, services or investments by Monash University.

As shown in 'Risk in operations' above, Monash has identified business practices that may position suppliers as vulnerable and increase the risks within their business or supply chain.

The University, both directly and as part of the Australian Universities Procurement Network (AUPN), has discussed modern slavery with several common suppliers as part of a consultative process.

Monash recognises that our operations and supply chains are complex and understands there will be unforeseen circumstances and challenges ahead as we address modern slavery risks. We are focused on understanding the existing risks more deeply and are exploring ways to reduce and eliminate them.

We will continue to collaborate with our peers, suppliers and external affiliations, as well as draw on the extensive knowledge of our academic experts and insights from other industries to develop meaningful solutions to the identified risks. The actions described below will be reviewed and fine-tuned as knowledge comes to hand.

### CASE STUDY 01: IDENTIFYING AND REDUCING RISK IN ELECTRONICS HARDWARE

While the IT hardware supply chain provides critical products and services to the University, it is fast-paced, complex and often opaque.

To increase transparency in our IT electronics supply chain, Monash has engaged with Electronics Watch, a leading not-for-profit that brings public buyers together to independently monitor and improve human rights in the IT hardware industry.

Electronics Watch maintains a database of final assembly factories and components for many IT hardware products, and seeks to improve the transparency of those supply chains by utilising the support of affiliates. Electronics Watch also supports its affiliates to work with suppliers on the disclosure of factories that are linked to the purchased product models.

As our work with Electronics Watch matures, we continue to integrate new practices into our proven IT methodology to drive transparency and accountability across our IT hardware supply base. The University will strengthen its work with Electronics Watch on factory disclosures in the future. Factory disclosures are a fundamental step to due diligence in human rights and risk management.

Electronics Watch uses monitoring partners near workers' communities in-country and partnership models to monitor working conditions in factories. The model used is to build trust and transparency across the supply base, especially with workers in public buyers supply chains.

Electronics Watch manages remediation on documented rights violations and risk in collaboration with brand companies, manufacturers and the [Responsible Business Alliance \(RBA\)](#). To make the collaboration effective, Electronics Watch and the RBA have set up the [Terms of Engagement](#) to guide the process after Electronics Watch has delivered a monitoring report.

In 2023, product models were assessed before making large-scale purchasing decisions of Standard Operating Environment (SOE) IT hardware. This has enabled both informed buying and the ability to inform the supply chain that modern slavery risks play a critical role in our purchasing decisions.

Some suppliers have been unsuccessful in selling certain products to the University due to unresolved modern slavery concerns with specific final assembly factories. This has been communicated to send a clear message back to the market—large sales opportunities may be lost specifically due to the way our supplier manages risk in their supply chain, and the lack of reasonable responses from the supplier or their assembly factories.

This is an outcome typically reserved for non-responsive or purposefully opaque supply chains as our preference is to work with our supply chain to help those at risk.

The University also works with Electronics Watch and other public buyers of IT hardware. This includes considering, and sometimes communicating, requests for our assistance to send messages to our suppliers where factories that make products we purchase are known to be of concern, opaque or non-responsive to reasonable information requests about their practices.

The University received information on more than 20 final assembly factories in 2023. These factories are, or are likely to be, part of our IT hardware supply chain and have been identified as having issues with the occurrence of modern slavery in their business.

Modern slavery issues were identified by various means including in-person interviews, site visits and online sources such as recruiting and court documents.

Assessments include classifying these issues as either ‘risks’ or ‘violations’. Violations are generally determined based on a violation of the human rights laws of the country which applies to that factory. Risks are identified when there is sufficient evidence to prove the likelihood that a potential violation of human rights laws exists, but there is insufficient evidence to state that a violation has occurred.

The data we obtained includes issues identified in the recent past but which are still considered open, such as ongoing remediation that may occur over several years. Limited information is provided in the report due to the sensitive and generally ongoing nature of efforts to improve anti-modern slavery outcomes. It is recognised that the discovery of these issues is a positive outcome of both our program of reduction and elimination of modern slavery and Electronics Watch affiliation, as this new transparency allows the opportunity for all parties to work together on these issues.

**12 factories were found to have violations.**

**8 factories were found to have risks.**

**1 factory was found to have both violations and risks.**

Violations	Number of factories
Discrimination in employment and occupation	7
Fair recruitment	12
Freedom of employment	9
Occupational Health and Safety	12
Termination of employment	3
Wages and benefits	10
Working hours	7
Violence-free workplace	6
Coercion of student interns	1
Freedom of association and collective bargaining	1

**Additional information on violations**

The type of violation and number of instances were identified in the data set. There is a clear pattern of abuse including:

- » targeting students, a group known to be at increased risk of modern slavery
- » excessive overtime
- » income deductions, including those that effectively prevent resignation
- » failure to pay social security
- » harassment of women
- » the deprivation of promised signing bonuses.

The type of violations discovered include items not considered to be modern slavery, but are still used to inform site specific remediation.

**Fair recruitment:**

- Excessive use of students and dispatch workers. (6)
- Recruiters or employees not registered to contribute to social security. (5)
- Workers hired without receiving or signing an employment contract. (3)
- Employers’ failure to renew work permits, leading to staff being confined to their hostel. (2)

**Freedom of employment:**

- Students coerced to complete internships unrelated to their study under threat of not receiving their diplomas. (9)
- Income deductions or other methods used to prevent workers from resigning. (6)
- Workers required to work in excess of legal overtime limits and no ability to refuse overtime. (5)

**Occupational Health and Safety:**

- Student interns working overtime and night shifts in violation of the law. (8)
- Failure to cover fees for health checks as required by law. (3)
- Failure to recognise work injuries suffered on the job-deprivation of medical benefits. (3)
- Unsafe work conditions such as standing 12 hours per day and handling toxic chemicals without training or protection. (2)
- Death, potentially related to 12 hours work per day (Non-homicide, non-substance abuse). (1)

**Wages and benefits:**

- Systemic deceit deprives employees of promised signing bonuses. (6)
- No contribution to housing funds for some employees. (4)
- Redefinition of the work week to deprive workers of legally mandated overtime premiums. (3)
- Illicit fines deducted from wages including for ‘poor attitude’ or normal production failures. (3)

**Working hours:**

- A total of 60–80 hours’ work a week during busy periods, often without a day off. (7)

**Violence-free workplace:**

- Women reporting harassment by staff. (5)

**Discrimination:**

- Older job seekers excluded from hiring. (2)

Remediation is ongoing in 11 factories and is actively managed by Electronics Watch and their in-country partners. In two instances, the identification of the issues resulted in positive responses from our direct supplier, leading to improved responses from their assembly factory. [Electronics Watch](#) is facilitating remediation in collaboration with brands and suppliers based on the Terms of Engagement process with the Responsible Business Alliance.

Risks	Number of factories
Discrimination in employment and occupation	8
Fair recruitment	5
Freedom of employment	6
Occupational Health and Safety	6
Termination of employment	0
Wages and benefits	3
Working hours	2
Violence-free workplace	3
Age discrimination	1
Illicit recruiters	1

The University receives regular status reports on each monitored factory directly linked to its supply chains as well as general reports on risks and violations in the ICT supply chain. It works with its suppliers and Electronics Watch to improve transparency in the supply chain to understand the exact locations of final assembly and component suppliers linked to procured product models. Electronics Watch supports the University in its engagement with suppliers through letters, to raise the profile of a factory and our concerns as a customer. If the University is not satisfied that appropriate steps are being taken to mitigate modern slavery risks we will reconsider using the supplier.

**CASE STUDY 02:  
SOLAR PANELS**

In 2023, a final solar deployment occurred which concluded the University’s strategic solar deployment across its existing buildings and campuses. Recognising the high risk of modern slavery in the solar panel supply chain, the risk was further assessed during the procurement process before the final procurement report was approved.

This risk assessment considered:

- » The identification of likely supply chains, which went all the way back to the mining of raw materials in some instances.
- » The identification of market options which satisfied requirements and could be proven to not include modern slavery risk.
- » The high global demand for solar panels and the limited influence the University’s intended spend on this deployment would have in the marketplace.
- » The assessment of various approaches by the University, including a review by the Modern Slavery Steering Committee.

The outcome of the review was to note that Monash had limited supply options and buying power, which limited the University’s ability to influence the market for this one planned purchase.

Discussions resulted in the following suggested improvements:

- » When an energy solution is being considered – before selecting solar energy as a solution – an informed decision should be made regarding which energy solution should be chosen, taking the modern slavery risk into account.
- » If Monash seeks to make future material solar panel purchases, the University may explore the consolidation of buying power with other universities (for example via the AUPN, subject to Australian Competition and Consumer Commission processes or approval).



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ACTIONS TO ASSESS  
AND ADDRESS  
**OPERATIONAL AND  
SUPPLY CHAIN  
RISKS**



## OPERATIONAL RISKS

### Recruitment practices

One of the key operational risks for Monash relates to recruitment practices for staff and students. Monash works to ensure all recruitment activities actively avoid risks for staff and students (including international students) in relation to servitude, forced labour, debt bondage in a homestay environment, and in seeking employment. Monash has developed policies, processes and monitoring practices to identify and avoid such risks. Monash is satisfied that our current set of relevant HR policies, procedures and student services programs address these risks, and we will continue to improve them as needed over time. These are described below.

All Monash University employees are engaged via employment instruments that meet or exceed Australian legal requirements. Monash HR is involved in the engagement of all staff, maintains and manages these agreements, and has formal hiring practices in place. This includes fair recruitment and hiring processes, as well as conditions of work and behaviour in the workplace requirements. Monash HR practices are subject to audit.

Monash staff and students have clearly prescribed rights through readily available policies and websites. Bullying, discrimination, harassment (including sexual harassment), victimisation and vilification are unlawful and are not tolerated.

In addition to policies setting out the requirements and rights of all staff and students, Monash has several easily accessible complaint and grievance processes. This includes clear identification, explanation and access to both internal and third-party complaint avenues, anonymous complaint handling, and set timeframes for complaints to be addressed before escalation.

Monash College has recruitment processes that include working rights and qualification checks, and verifying that all employees are above minimum working age in line with relevant Australian employment legislation.

In 2021, Monash College updated its Recruitment and Selection Policy and Procedure to include reference to modern slavery and associated legislation. An internal audit of staff recruitment was undertaken in late 2023 with the final report to be received in 2024.

The College engages with third-party recruitment agencies and consultants periodically, and utilises the University's preferred suppliers where possible.

The network of migration agents used for the Professional Year is subject to a recruitment and vetting process which is actively monitored and managed according to Monash College policies and procedures.

In 2023, the agent agreement for the Professional Year program was updated to include the modern slavery clauses drafted by the Office of the General Council.

It was identified that students, particularly international students, may be at risk in the early phase of their careers even though, in many cases, this employment is not formally part of University operations or supply chains. To reduce employment-related risk for students within Australia, Career Connect and Graduations has the Career Connect program in place to educate students by providing employability workshops, workplace rights information and resources on work conditions, pay rates, Fair Work Ombudsman and Fair Work links. This important information is shared with student organisations and cohorts at each campus.

The modern slavery reduction and elimination program undertakes an annual check with the Group Manager, Career Connect and Graduations, in respect of their responsibility to maintain ongoing awareness of the Career Connect program and its proactive management of modern slavery risks.

The risk of modern slavery occurring in student employment within Australia with third parties is now reduced through a comprehensive education and risk mitigation program, as well as a grievance mechanism. It is actively managed by the Group Manager, [Career Connect](#) and Graduations. Additional work is underway to extend similar support to Monash University, Malaysia and Monash University, Indonesia.

### Procurement practices

As a leading institution in the higher education sector, Monash is committed to educating our staff and students on the challenges and opportunities of advancing human rights. Monash's academic expertise is central to meeting this commitment.

In consultation with our academic experts, Monash developed and launched a procurement-focused modern slavery training module at the end of 2021. The training aims to raise awareness of hidden slavery practices in supply chains and to notice signs of potential issues. In the first stage of deployment, the training was assigned to staff with significant procurement responsibilities. Further deployment to all staff with procurement responsibilities and all new staff occurred in 2023.

Monash also has a mature procurement framework in place, including a value and risk-based approach to procure goods and services, detailed policies, standardised templates, governance, separation of duties, training and auditing.

Our procurement policies and procedures, as well as sourcing document templates, provide detailed guidance to staff on responsible procurement practices, such as allowing sufficient time for procurement planning, clear specifications, setting realistic expectations, ethics, confidentiality and probity.

Specific advice is provided by Strategic Procurement as needed across the University and its entities, such as when a tender is being planned for the purchase of a high-risk product or service. This advice comprises customised questions, advice on standard term usage, and the review of modern slavery tender responses as subject matter experts. Highly complex analytical expertise is, at times, provided for complex high-risk services to reduce the risk of engaging a supplier connected with modern slavery.

The Strategic Procurement team, which leads the implementation of the program of reduction and elimination of modern slavery, also completes the Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply eLearning program and tests on an annual basis.

## SUPPLY CHAIN RISKS

Considering the wide spectrum of goods, services and works Monash procures, and the extensive network of domestic and global suppliers, there is a reasonable presumption that most forms of modern slavery may exist to varying degrees and at various stages along our supply chains, particularly where low-skilled and vulnerable migrant workers are involved, and where conflict or political instability exist. The University seeks to identify, eliminate and remediate any such instances.

Our approach to mitigating the existence of modern slavery in our organisation and supply chains is to create awareness and assert influence through supply chain risk analysis, sourcing, contractual instruments and training.

Further work will be carried out to identify and improve potential undue pressures that may be placed on our supply chain as a result of setting short delivery times or unreasonable results. These may occur due to either individual or business practices or expectations.

## RISK ASSESSMENTS

### Assessing risk in Australia

- Our risk assessment methodology is multi-pronged and dynamic. Each year, we utilise the latest Department of Home Affairs and Global Slavery Index advice for high-risk focus areas for Australian imports. We also use our spend-based risk assessment system created via our work with AUPN, with additional guidance from our academic experts.

Factors include – but are not limited to – industry, product source location, and product or service types.

### Assessing risk in countries outside Australia

- We utilised the Global Slavery Index for identifying high-risk imports to Malaysia. In addition to the risks from products imported into Malaysia, Malaysia is a country of concern regarding labour rights. In addition to the risks from products imported into Malaysia, Malaysia is a country of concern regarding labour rights. Further work is required to investigate areas of concern in relation to labour rights.
- Our Electronics Watch affiliation enabled risk and issue identification for many areas of our electronics supply chain.

### Building a sector-wide, approach to risk identification

The University continues to work as a contributing member of the AUPN to assess additional risk management methodologies and systems.

This higher education sector approach seeks to share information on risks and risk mitigations where reasonable. It will also enable a view of the modern slavery risk facing the broader university sector.

An initial version has been deployed and continues to be developed. It is anticipated that the sector approach will augment our existing risk management methodology.

### Spend-based risk assessment

- An assessment of spend against known high-risk countries and categories was undertaken in 2023 with the outcomes below. A key outcome shows that our supply chain modern slavery risks predominantly lie in the types of goods and services procured rather than where we procure from, and that we have a small number of suppliers that account for the majority of spend in high-risk categories. This has informed our approach to address the risks by directing efforts to high-risk categories, especially the high-spend suppliers within these categories.

## SOURCING PROCESSES

Monash has both short-term tactical and longer-term strategic engagements with suppliers. Significant purchases follow a formal tendering process unless a formal exception is sought and granted by Strategic Procurement. As part of this tendering process, suppliers are required to provide information in their response related to environmental and social responsibility. The information requested regarding social responsibility includes specific mention of modern slavery within the supplier and its supply chain, information regarding compliance, and the supplier's actions taken to address modern slavery. Specific information requirements may be utilised for known high-risk products and services.

**NEW SUPPLIER ONBOARDING**

All new mid-to-high value or recurring suppliers to Monash University must confirm they are compliant with relevant modern slavery requirements to proceed

through Monash's supplier onboarding (supplier creation) process in Australia. A supplier that has not successfully been through this process is not able to be ordered from or paid. A total of 1557 supplier records were created through this process in 2023.

**SUPPLY CHAIN RISKS SUMMARY**

# 11 HIGH-RISK COUNTRIES WITH SPEND

(China, India, Bangladesh, Laos, Pakistan, Vietnam, Thailand, Malaysia, Sri Lanka, Cambodia, Afghanistan)

**143**  
SUPPLIERS

**\$6.3M**  
COMBINED  
SPEND

**80%**  
of the spend is concentrated with **23** suppliers

- » Most of the spend is on lower-risk professional support services in those countries such as auditing, research and marketing. One key exception is chemicals, which may include some that could be high-risk, especially at the raw materials extraction stage despite the extraction location being in another country.
- » These figures include some scholarship and research-related spend, and excludes some Monash-related entity spend.
- » Iran may be considered as low-risk and excluded as it is a scholarship-related spend.

# 6 HIGH-RISK CATEGORIES

(cleaning services, electronics, security services, retail leases, apparel, solar panels)

**1908**  
SUPPLIERS  
11 COUNTRIES\*

**\$84.3M**  
COMBINED  
SPEND

**80%**  
of the spend is concentrated with **9** suppliers\*

\*A supplier may be operating in and supplying from more than one country.

- » Considering our proximity to the risk, bargaining power, supplier dependency, availability of alternative suppliers and level of spend, each of these categories is either being addressed via a specific action or has an action plan in place. These are discussed further in the 'Areas of focus' section (page 44).

Excluded are one-off or low-value suppliers that utilise a more stream-lined process due to the large volume and generally lower risk profile.

Additional due diligence is conducted in the supplier selection process for contracts assessed as being high-value and/or high-risk. Monash assesses information from potential suppliers through these processes, including:

- the company's modern slavery statement
- answers to a range of specific modern slavery questions
- details on the supplier's practices and other relevant information
- any relevant third-party certifications the supplier may have.

Contracts with these suppliers are then supported through a framework of template modern slavery clauses which have been developed for use based on the risk profile of the goods and services being procured.

The University has low-risk and high-risk tender and clause templates. Commercial and legal staff have received training and supporting quick guides, and will have ongoing assistance for modern slavery risk assessment of tenders and agreements. Commercial and legal staff may use the corresponding templates after the risk level has been determined.

## CONTRACT AND SOURCING DOCUMENT TEMPLATE WORDING

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A framework of template clauses has been created and deployed by Strategic Procurement, an academic expert, and the Office of the General Counsel for implementation in key documents where Monash is procuring goods or services, including sourcing documents and relevant template agreements.

### The template clauses include:

- 'low-risk' provisions for general use
- 'high-risk' provisions applicable to high-risk suppliers or procurements
- specific terms related to electronics hardware.

The 'low-risk' provisions require suppliers to identify, assess and address modern slavery within their operations and supply chain, and subsequently notify Monash of any instances of modern slavery practice. They also provide the right for the University to terminate any arrangements with the supplier in the event they have failed to rectify according to their obligations under the provisions or have provided the University with false or misleading information.

The 'high-risk' provisions place additional obligations on suppliers to provide a detailed report on their efforts in identifying, assessing and addressing modern slavery risks, as well as to request their downstream suppliers to comply with similar conditions. An inspection provision can be added where risk is deemed to be very high to enable Monash or its nominated agent to conduct investigations.

The 'electronics hardware' terms are used in addition to 'low-risk' or 'high-risk' to specifically address the procurement of electronics. They authorise University-appointed third parties (in particular, Electronics Watch and its affiliates) to undertake physical inspections of factories, interview employees and inspect factory records.

These clauses are approved and have been implemented in the various templates by the Office of General Counsel and are now being used in new agreements.

## TRAINING AND COMMUNICATIONS

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The training module was developed and continues to use real-life scenarios to create awareness among staff with procurement responsibilities.

The publicly accessible **Monash University Modern Slavery website** is the homepage for the University's modern slavery program of reduction and elimination of modern slavery. This website hosts the annual Modern Slavery Act Reports as they are published, outlines our approach to tackle modern slavery, and provides additional educational resources. Its content will grow as the program progresses. There is also a **Monash College Modern Slavery website**.

An integrated digital communications campaign using both internal and social platforms will be executed annually as the program continues. This campaign includes social media and web-based communications, and aims to raise awareness, promote discussion, and provide additional skills and information on the issue to staff and students.

### CASE STUDY 03: COMPLEX CLEANING SERVICES TENDER

In 2023, the University's Buildings and Property Division (BPD) executed one of the largest cleaning services tenders in Australia. This represents one of the highest value, most complex and high-risk services the University utilises.

#### Understanding the risks

Cleaning services is identified as a high-risk industry by the Department of Home Affairs. Potential risks include withholding of wages, immigration-related coercion and threats, deceptive recruitment, excessive overtime, debt bondage, confiscation of personal and travel documents, and dangerous and substandard working conditions. These have all been found within Australia's cleaning industry<sup>1</sup>.

Cleaning industry workers are identified as vulnerable due to complex supply chain structures, lack of transparency and negligent contracting practices, insufficient resources to monitor and enforce compliance, dangerous work, low barriers to entry, a high proportion of temporary/casual migrant workers whose immigration status may be precarious, and workers with a lack of social networks or knowledge regarding workplace rights and very little power to obtain redress when experiencing exploitation at work<sup>1</sup>.

The procurement approach was developed from the earliest stages to target increased transparency in the specification and delivery of services. This supported the reduction of modern slavery risk in this very complex, large-scale, high-risk area. The University's expectations were made clear to all tenderers at the start of the Request for Tender process, which was well received by the industry as transparent and fair. The process benefited from significant senior executive sponsorship, including support to consider any methods to reduce and manage risk in this area.

#### Key activities/requirements included:

- Highly detailed tender pricing and worker transparency to enable comparative assessment and for this transparency to be maintained throughout the contract duration.
- Reasonable workloads must be taken into account at a detailed level and be factored into all staff volumes and scheduling.
- The risks and avenues by which risks may be realised must be understood with mitigation approaches provided.
- The successful supplier must maintain its risk focus throughout the contract duration, not just at the time of tendering.

- The service solution must enable frequent and efficient variation to the required work with transparency and efficiency for both parties.
- The avoidance of subcontracting as much as possible (planned and clearly identified subcontracting is allowed for some non-core areas such as pest control, but modern slavery information from subcontractors is required before they are approved).
- Strong history of good general employment practices.
- Evidence to confirm compliance with the Modern Slavery Act (Cth) including up to date modern slavery reports to be provided each year.
- Compliance with the Victorian Government Supplier Code of Conduct.
- The creation of specific high-risk modern slavery clauses targeted at cleaning services, for inclusion in the final agreement.
- The consolidation of services under one provider to enable a consistent approach to managing the services and risk.
- The requirement for the supplier to provide detailed data throughout the contract duration, which will be assessed by the University using automation to allow the rapid identification of very specific areas of concern.
- Reasonable productivity levels based on area type were identified with the assistance of the Cleaning Accountability Framework (CAF), including to mitigate the risk of overworking staff.

A complex in-house resource planning and pricing model was created by Strategic Procurement and BPD, which enabled the application of these productivity rates to resource and task planning and pricing.

This model was developed at a very detailed level—the model covers the exact area of the various types of locations, rooms and labs on every floor in every building at:

- Clayton campus, including Monash Residential Services
- Caulfield campus
- Peninsula campus
- Clayton off-campus buildings and locations
- 750 Collins St, Melbourne
- Parkville campus
- Alfred Hospital Centre (University-cleaned areas)
- Monash Medical Centre
- 555 Lonsdale Street, Melbourne
- 30 Collins St, Melbourne
- various other off-campus locations from which Monash staff operate.

1. [CAF Modern Slavery Guidance Contractors](#), viewed 7 February 2023.

The model was initially used to undertake a level-playing-field evaluation of tender responses with certain fixed fields, and will be used by the University to support ongoing management of the complex cleaning contract.

### Assessing modern slavery disclosures

As part of tender evaluations, modern slavery disclosures were rated against a modern slavery quality scoring matrix<sup>2</sup> divided into areas aligned with the Modern Slavery Act's reporting requirements, including:

- Structure and operations
  - organisational structure
  - major sites and locations
  - employees
  - consultation process including affiliated entities.
- Supply chain
  - number of suppliers
  - suppliers by country/region
  - supply spend
  - spend by category.
- Modern slavery risks in operations and supply chains
  - expertise demonstrated
  - risk assessment model
  - risk scoping
  - assessment of risks in operations and supply chain
  - risk linkage (caused by, contribute to and linked to)
  - types of modern slavery risks.
- Due diligence and remediation processes
  - due diligence process
  - remediation process
  - relevant policies
  - resources used to assess suppliers
  - modern slavery training for employees and suppliers.
- Effectiveness assessments
  - effectiveness of risk management
  - KPIs
  - external collaboration
  - examples of actions and case studies.

Each section was further broken down into information expected to be received, which was used to score each of the above requirements.

2. Pham, N., Cui, B., & Ruthbah, U. (2021) Measuring the Disclosure Quality of Modern Slavery Statements: ASX300 Companies [White Paper]. Monash Centre for Financial Studies, Monash Business School. DOI: 10.26180/17170742.

### Planning for a transparent future for cleaning services

The University will commence cleaning services in 2024 using the new methods, tools and reporting. Further updates will be provided in the next Modern Slavery Act Report.

### CASE STUDY 04: COMPLEX SECURITY SERVICES TENDER

Another major procurement process undertaken by the University in 2023 was for security services. Like cleaning, security is a highly labour intensive complex industry vulnerable to modern slavery. Accordingly, similar mitigation strategies to those employed in the cleaning process were used during the very early procurement stages of tender planning, through to the evaluation, negotiation and contracting stages.

The University has a material spend on security services.

Of the 31 suppliers, there is a heavy concentration on one supplier.

- Security services have a similar risk profile to cleaning services. The University's spending is also significant in this area. We adopted a similar approach to cleaning services to address the risks.
- A deep dive into this area will occur in subsequent years as part of our prioritised risk approach. Currently, the concentration with one key 'tier one' supplier allows us to apply a focused approach to work closely with this supplier.

Each tenderer was asked to demonstrate how their organisation reduces the risks of modern slavery in their organisation and supply chains, and to provide information on, or evidence for:

- » Steps undertaken to identify and address risks of modern slavery practices in the organisation's operations and supply chain during the tendering and throughout the life of the contract.
- » Meeting of exceeding Australian legal requirements including complying with their obligations under the Modern Slavery Act 2018 (Cth), and capability to maintain compliance during the life of the contract.
- » The publication of an accurate Modern Slavery Act report each year.
- » Processes in place to identify, manage and remediate any modern slavery or associated practices identified within its operations or supply chain.

- » Risk management and due diligence processes to identify, investigate and remediate any instances of modern slavery and related labour risks, including all forms of forced labour, bonded labour and human trafficking in the organisation's operations and in those of its suppliers, and to remove the offending practices.
- » Notify the University of any suspected or documented modern slavery cases within its operations or supply chain during the life of the contract.
- » Conduct any due diligence for modern slavery and related labour risks prior to any proposed subcontracting, which must be approved by the University.
- » Having required licences to hire labour including subcontractors' staff.
- » University to have authority to disclose information to Australian Government entities if required.
- » Provide training to employees on modern slavery and related labour risks to introduce good employment practices.
- » Requirement of the service provider to provide reports/ data during the life of the contract to identify any areas of concern.
- » Confirmation that the tenderers will adhere to any University policies as notified by the University from time to time, together with the Victorian State Government Supplier Code of Conduct.

A detailed pricing model was produced by BPD and Strategic Procurement seeking itemised and transparent hourly rates, and requiring on-costs broken down to categories in line with the Security Services Industry Award and respondent's enterprise agreement awards if applicable.

### Assessing modern slavery disclosures

The tender included a social responsibility criterion which had a sub criterion to address modern slavery in order to understand the tenderers' practices. This section was broken down into following categories:

- employment practices
- social and labour responsibility
- general business ethics.

### Planning for a transparent future security service

The successful security services tenderer and the University will commence security services in 2024 adopting the new methods, tools and reporting.

Further updates will be provided in the next Modern Slavery Act Report.

## AREAS OF FOCUS

Using risk assessments, supplier questionnaires, and academic and industry knowledge, Monash has identified the following areas within its supply chain that are of higher potential risk. We have increased our focus on these areas.

### Cotton and apparel

Work has been undertaken to:

- Identify the various groups that buy apparel across the University.
- Understand the nature of what they buy, what drives demand and supplier selection.
- Factor in other considerations such as Monash University branding rules.
- Understand existing proven suppliers and recognise any efforts they have made to reduce modern slavery risk.

The majority of spend on apparel is by Monash Retail. Other buyers include higher risk spot-buying of small quantities of products, such as by a team for a specific project. These purchases have been identified as especially high risk due to a strong focus on price and delivery timeframe with insufficient understanding of the supply chain risk.

The University continues to evaluate creating a pre-approved panel of apparel suppliers and assess introducing practices to funnel apparel spend through the pre-approved panel. This work is expected to be completed in 2024.

### Retail leasing agreements

Existing agreements are compliant with all legal obligations including labour obligations at the time of execution. Due to the wide variety of agreement types and expiry dates, an agreement is assessed against the latest modern slavery and other template clauses when an agreement is to be entered into or is to be renewed or extended prior to execution. If needed, clauses are uplifted to meet the latest requirements. This ensures that the document is updated during the renewal process including:

- any changes required to meet legal obligations
- the update/introduction of modern slavery clauses.



## ADDITIONAL ENTITY – SPECIFIC AREAS OF FOCUS

### MONASH COLLEGE

The primary focus throughout 2023 for Monash College was on training and compliance. Monash College also participated in the Monash University Modern Slavery Steering Committee and Modern Slavery Working Group, and has supported the implementation of the FRDM supply chain risk management tool and staff training.

Monash College identified supply chain risks remain unchanged from the 2022 report. Monash College spent \$9 million with suppliers in 2023 and used the Monash University preferred suppliers list. High-risk supply chains, including cleaning service and IT hardware, are managed by the University through BPD and eSolutions.

#### Areas of focus for Monash College in 2023 included:

- Ensuring the modern slavery training module was assigned to and completed by all staff with a financial delegation. Procurement training has been delayed to 2024 to be undertaken post the implementation of Pro-Spend.
- Updating the agent agreement for the Professional Year program to include the modern slavery clauses as drafted by the Office of the General Counsel.
- Review and rationalisation based on a low risk of modern slavery occurring in the business of each of the catering services provided to Monash College with a view to establishing a preferred catering service list with approved caterers.
- Recruitment, onboarding and retention audit, with five low-risk recommendations.

#### Monash College offshore partnerships

- The Offshore Agreement template includes anti-modern slavery clauses required by the University to meet its obligations under the Modern Slavery Act 2018 (Cth) for all new providers to sign. One new offshore partner, Tianhua College, commenced in 2023. The Tianhua agreement has these anti-modern slavery clauses. Further risk assessment of this provider in relation to modern slavery will be conducted in 2024.
- Expanding the modern slavery training module to offshore partners was not achieved in 2023. The intended recipients of the training are senior level staff at offshore partners.

### MONASH UNIVERSITY INVESTMENTS, INCLUDING THE MONASH UNIVERSITY FOUNDATION PTY LTD

Monash, via its investment advisor and investment managers, actively engages on ESG issues to influence corporate behaviour where possible.

#### The ESG investment process will:

- Require the University and investment fund managers to be signatories to the United Nation's Principles for Responsible Investment (PRI). The PRI requires the incorporation of ESG issues, including modern slavery risk, into analysis and decision making processes.
- Incorporate third-party ESG ratings in the selection process for fund managers.
- Invest in some tailored portfolios that exclude exposure to coal, tobacco, uranium and cluster munitions.
- Incorporate the investment managers' approach to integrating ESG in the annual manager reviews and sector reviews.
- Review opportunities to invest in ESG – oriented investment strategies that meet the investment objectives of the long-term investment pool.
- Require fund managers to actively engage with investment companies on ESG issues.
- Seek annual updates from all investment managers on what they have done in relation to the Modern Slavery Act over the past 12 months.

**Throughout 2023, all fund managers were signatories to the PRI and provided the University with all required reporting on their progress in relation to modern slavery.**

## MONASH UNIVERSITY, MALAYSIA

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Monash University, Malaysia has representatives on the Modern Slavery Steering Committee and Working Group.

Staff training requirements are checked annually to ensure that relevant senior staff and those working in commercial or legal roles have undertaken the modern slavery training.

In 2023, work began on assessing the contracting methods utilised by Monash University, Malaysia.

### Work undertaken includes:

- Identify any existing contract templates.
- Ensure template anti-modern slavery clauses are added to all contract templates and adjusted to suit local Malaysian laws.
- Identify any use of internal or third party lawyers to ensure use of the updated templates.

In 2024 work begins to update and deploy new templates.

## MONASH UNIVERSITY, INDONESIA

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Monash University, Indonesia has a representative on the steering committee.

In 2023, we continued to onboard Monash University, Indonesia according to the University's cross-entity operational framework. Key staff were identified and completed modern slavery training.

In 2024 additional spend analysis and risk identification will be undertaken.

## WORLD MOSQUITO PROGRAM

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The World Mosquito Program has representatives on the Steering Committee and Working Group.

We continue to onboard the World Mosquito Program according to the University's cross-entity operational framework.

In 2024 additional spend analysis and risk identification will be undertaken.

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# ASSESSING THE EFFECTIVENESS OF ACTIONS



## GENERAL APPROACH

Monash recognises the complexity of modern slavery and has established the Monash University Modern Slavery Governance Structure to guide and assess its modern slavery reduction and elimination program and the evolving framework specifically for review and remediation of any concerns or instances identified.

In addition to an existing control framework to ensure compliance in the following areas, the University's modern slavery reduction and elimination program has established an advisory committee with decades of global expertise and experience in the areas of:

- human trafficking and slavery
- criminology
- operations and supply chain management
- employment law and regulation
- temporary migration
- business law
- human rights
- global business
- migration and inclusion
- violence against women.

The University is completing final internal approvals before the release of a Modern Slavery Reporting Procedure, which supports the lodgement of concerns through various channels and defines how they must be managed, with senior executive accountability.

Specific complaints or concerns received will be managed as per the Modern Slavery Reporting Procedure.

If the modern slavery reduction and elimination program uncovers potential or actual instances of modern slavery, initial data will be obtained and the Working Group and Steering Committee will be consulted to identify the best way forward, with a focus on helping the victims and implementing realistic actions in response to the issue up to its identified reasonable resolution and follow-up plans.

If there may be an imminent threat identified to a victim's safety or wellbeing at any stage, the Australian Federal Police (or other national police force in other countries) will be contacted as a matter of urgency.

Monash will undertake an assessment of the effectiveness of its actions in subsequent years of its five-year modern slavery reduction and elimination program, with these reviews reflecting the progressing program of work:

1. Where appropriate, the use of third-party partners or auditors to check on suppliers and factories – including offshore – to verify that real and meaningful progress has been made and remains in effect. This is currently in place for IT hardware.
2. Internal compliance checks with checklists designed in conjunction with our academic experts. Examples already identified include:
  - a. confirming the use of the correct contract and RFT templates containing the latest anti-modern slavery clauses, which was first completed in 2023
  - b. the supplier onboarding gate being effectively in place, which is confirmed annually
  - c. training completion rate by key staff, which is updated and calculated annually
  - d. supplier questionnaires – currently on a case by case basis and during tenders while a more comprehensive solution is being developed with the AUPN
  - e. documentaton of all high-risk areas and their status through to completion.
3. External sector engagement (such as via the AUPN) to assess cross-university effectiveness, combined supplier influence, and compare sector performance with Monash.
4. External stakeholder engagement to continue the dialogue with third parties in relation to risk identification and strategising in relation to identified risk.
5. Affected labourers identified as being subject to modern slavery practices and how they are progressing after remediation steps have been taken. This is a longer-term goal.

## KEY PERFORMANCE INDICATORS

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

### Supplier onboarding

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

Target:	100%
Achieved:	100%

The new Monash University modern slavery supplier onboarding gate has been in place for 1557 new suppliers over 2023.

There has been 100 per cent compliance with the onboarding gate from new suppliers and no manual exceptions processed.

This meets our KPI of 100 per cent compliance for normal supplier onboarding. Exceptions to this rule are low-value, low-risk one-time suppliers and credit card transactions, or manual supplier onboarding exception approval should it be justified. One-time suppliers and credit card transactions are deemed suitable for an alternate procurement approach at this time. This is by design as part of a prioritised approach, and they will be considered at a later time in addition to other entities.

### Staff training

KPI: Percentage of key procurement and legal staff completing the training

Target:	100%
Achieved:	100%

A total of 3761 staff completed the online modern slavery training module in 2023.

#### All new KPIs for 2023 were met:

- The most senior University staff 55/55 – 100%.
- Modern Slavery Steering Committee 18/18 – 100%.
- Modern Slavery Working Group 17/17 – 100%.
- Staff that work in areas that may include material commercial, legal or purchasing matters 136/136 – 100%.

Duplication of numbers may occur in some instances if a staff member is part of more than one of the above groups that requires training against a group KPI.

Training in modern slavery has been widely deployed across the University including to all new staff.

Reporting year	Completed
2022	5162
2023	3761
<b>Total trained</b>	<b>8923</b>

### Modern slavery reporting by fund managers

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

Target:	100%
Achieved:	100%

Monash University investment fund managers must provide an annual report to the University. This includes a mandatory report on modern slavery-related actions undertaken over the previous 12 months.

All reports were reviewed and included an acceptable level of detail. Each listed meaningful and reasonable actions such as supplier risk assessments, investment risk assessments, and staff training.

Reporting on meaningful modern slavery progress by fund managers has a 100 per cent KPI which has been satisfied.

### Update offshore partners review process (Monash College only)

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

Target:	100%
Achieved:	NIL

The offshore partner annual desktop review process builds on the self-assessment questionnaire. After assessing all partners as low-risk, the intent in 2023 was to review all partners. However, this was deferred for operational reasons. Two new partners undertook self-assessment, one of which was considered low-risk, the other operates in a higher risk environment. Further work is required on audits, training and standardised tools for our offshore partners. Review of modern slavery compliance is scheduled to be incorporated into the partner auditing process.

## A REVIEW OF OUR 2022 COMMITMENTS/HIGHLIGHTS

2022 commitment	What we did in 2023
<b>Expanded monitoring of compliance with requirement to include modern slavery clause</b>	Spot compliance checks were undertaken on several contracts executed recently to ensure anti-modern slavery terms were in use, and the correct high or low-risk terms were used. The audit was carried out by Risk and Compliance and the Office of the General Counsel.
<b>Offshore agreement and sourcing template updates</b>	A discovery exercise was undertaken to understand the situation for each offshore entity that has commenced onboarding. This included a review of the methods used to create and execute agreements by each entity. This includes any use of in-house, third party, and/or Monash University legal counsel. The use of contract templates was also identified as well as the types of contracts typically used. It was identified that the requirements including standard contract terms are unique to each country, and the way in which updates are deployed varies by entity. This exercise allows the creation of a specific plan to update the templates for each entity. This may require significant work such as translation into different languages.
<b>Implementation of operational framework</b>	The Operational Framework is currently being used for onboarding Monash University, Indonesia and the World Mosquito Program. It was modelled on lessons learned when onboarding Monash University, Malaysia. The framework is designed to be suitable for the onboarding of any current or future entity globally.
<b>Expanded offshore training rollout</b>	Training has been deployed more deeply into Monash University, Malaysia, Monash University, Indonesia, and the World Mosquito Program, with additional roles being identified as requiring mandatory training. The training package has been successfully deployed to the training system used by each entity.
<b>Apparel</b>	A commercial solution for apparel is being executed in 2024, utilising baseline work undertaken in 2023. The creation of a pre-approved apparel panel is being planned.
<b>Cleaning</b>	A high-value and complex tender was completed in 2023 addressing the significant modern slavery risk of cleaning services. Preventing modern slavery was at the core of the procurement process and contract design and execution. Material improvements have been developed which await operationalisation and review in 2024 and subsequent years.
<b>Security</b>	A high-value and complex tender was completed in 2023, addressing the potential modern slavery risk of security services. Preventing modern slavery was at the core of the procurement process and contract design and execution. Material improvements have been developed which await operationalisation and review in 2024 and subsequent years.
<b>Solar</b>	<p>The University deployed most of its planned solar panels in previous years. An assessment of an additional planned solar deployment highlighted the risk of modern slavery in this industry. The University is a relatively small customer, with limited proven low risk of modern slavery options in the market. Efforts by the University to increase transparency in the supply chain highlighted the modern slavery risk across a multitude of solar panel brands. Many panels can be traced back to solar grade polysilicon and/or panel producers. There is strong concentration of suppliers within the solar industry including at the raw polysilicon, individual component and panel assembly levels of production.</p> <p>BPD has identified the following for future projects that may result in solar deployment:</p> <ul style="list-style-type: none"> <li>» Consideration of the existence of modern slavery should occur at the early planning stages before a decision has been made on the energy type (i.e. solar vs wind).</li> <li>» This risk will need to be assessed early in project planning to identify changes in supply chains such as new lower-risk suppliers.</li> <li>» The University may consider the benefits of increasing purchasing power via the AUPN (subject to ACCC approval and processes).</li> </ul>

2022 commitment	What we did in 2023
<b>Supplier due diligence in tenders/ processes</b>	Suppliers are asked several questions during tenders related to responsible procurement, employment and anti-modern slavery practices. Where a tender is for known high-risk products or services, customised modern slavery questions and evaluations are typically used in addition to anti-modern slavery contract clauses made for high-risk purchasing being used in the supplier agreements. At this time, the best approach has been using a bespoke approach tailored to that industry, product or service. A broader higher education sector approach to supplier questionnaires is being worked on as part of our participation in the AUPN.
<b>Training program review</b>	This has been deferred. Additional training KPIs have been introduced in 2023 to ensure training is completed by a wider variety of staff, with 100 per cent of key staff completing their training. The course enjoys a high uptake, including many instances of voluntary enrolment. All new staff are also allocated the training. While the Steering Committee has determined that training is functioning acceptably, there will be an assessment of training effectiveness scheduled which will establish the ideal training frequency by assessing information retention at various lengths of time after training was completed.
<b>Monash College partner review</b>	One new partner commenced in 2023 which will be reviewed in 2024.
<b>Student Placement Agreements updated and deployed</b>	Developed by the Industry Placement team in 2023.

## REMEDIATION

Remediation is underway with 11 factories via our affiliation with Electronics Watch.

Monash identified no other incident requiring remediation in 2023.

We acknowledge we may not have visibility of all areas where remediation may be required. Where remediation may be required, it will be discussed with the Working Group and academic experts, and then reported to the Steering Committee. Solutions for impacted parties may include:

- direct monitoring
- indirect monitoring via a qualified third party
- termination of the engagement.

The University has identified the need to have a remediation framework which has been included in our program plan for 2024 and 2025.

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CONSULTATION  
WITH WHOLLY  
OWNED  
**AND CONTROLLED  
ENTITIES**





## PROCUREMENT

Monash University has a distributed procurement model embedded in most entities within scope of this report. Strategic Procurement manages primary University-wide procurement policies and procedures, and provides support across any procurement projects as required, typically high-value risk and/or University-wide contracts.

The Strategic Procurement team annually completes the Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply eLearning program and test. Strategic Procurement leads the modern slavery reduction and elimination program for all in-scope entities and the preparation of the joint Modern Slavery Act Report for Monash University. It also provides subject matter expertise for all modern slavery-related issues across the University and its entities. Relevant entity staff have been engaged directly to understand their situation and procurement, and to assist with their compliance.

Strategic Procurement is responsible for coordinating all procurement activity across the University, implementing procurement policy and procedures, and providing category management for strategic categories across the University. Strategic Procurement also provides strategic sourcing support across the University, as well as expert support, advice and tools to all procurement specialists. Procurement specialists are located in business portfolios for specialist procurement categories (such as BPD and eSolutions), and are responsible for the procurement and contract management of specified categories.

Monash College and Monash University, Malaysia have their own procurement functions. They work closely with Monash University to drive alignment and the application of suitable policies and procedures where necessary. Monash College and Monash University, Malaysia representatives are part of the Modern Slavery Working Group. Monash University Foundation is managed within the portfolio of the Chief Financial Officer and Senior Vice-President. The Foundation operates within Monash University's Australian purchasing processes and has representation on the Modern Slavery Steering Committee.

## OPERATIONS

Reporting structures are structured so that Monash University, the parent entity, is aware in all situations of operational concern and key decisions for all controlled entities.

An operations representative is present on both the Modern Slavery Steering Committee and the Modern Slavery Working Group.

## CONSULTATION AND ONBOARDING OF ENTITIES

The onboarding process has now been refined and we have a proven, structured approach that includes both ongoing engagement and consultation. It is expected that additional entities outside of those that currently exist will be created over time, which warranted an efficient, standardised approach.

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

A phased approach is used for thorough onboarding.

- **Engagement:**  
Raising the topic of modern slavery and the program of work with a suitable member of the entity's senior executive group. Due to a clear reporting line of the CEOs of wholly owned entities to the Vice-Chancellor and President, initial engagement is efficient and simple.
- **Entity representation:**  
A request is made for the nomination of appropriate staff to represent the entity on the working group and steering committee.
- **Knowledge transfer:**  
Background briefings are provided to relevant staff from the entity to increase awareness and the level of modern slavery knowledge within the entity.
- **Supply chain risk assessment:**  
The cleansing and inclusion of the entity's procurement data into our database, including uploading into the FRDM tool for risk assessment. An assessment of the entity's specific risks within their home country as identified by the latest Global Slavery Index report.
- **Additional consultation specific to the entity, including:**
  - » the identification of the unique risks and concerns the entity may have
  - » understanding the operations and supply chains the entity has in place
  - » the identification of template agreements, processes, procedures, and any sourcing documents that may need to be reviewed, including any that may be in foreign languages
  - » relevant legal nuances (for an offshore entities), including any existing modern slavery-related legal obligations that apply in their country, and staff employment instruments in place

- » planning and socialisation of timing, expectations, and outcomes—these are updated in conjunction with the entity representatives
  - » subsequent phased introduction of the modern slavery program of work for that entity, followed by the commencement of a more detailed inclusion in the next annual Modern Slavery Act Report.
- **Training:**  
The identification of key staff in the entity to undertake modern slavery training, the rollout of the multimedia training module to those staff, and the tracking of its completion.

The work required to onboard an entity, including any risks identified and the plans to address them, is discussed at the Working Group and Steering Committee meetings before being factored into the work program. The entity's representative in the Working Group and/or the Steering Committee creates a central, knowledgeable consult back into the entity for all aspects of the program.

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

In this way, the process was continually refined. During 2023, we determined that we had a well-defined, common, proven onboarding methodology that we have now formalised into our Modern Slavery Operational Framework. This framework provides an all-in-one document that explains why and how onboarding occurs.





# ONE MONASH

## A GLOBAL COMMUNITY

As a university with a global footprint, we know we have to play our part in solving the problems facing the world. Our main base is in Australia, but our presence extends to locations in China, Malaysia, Indonesia, Italy and India. We also have partnerships with many international teaching institutions. Through our shared values, experiences and goals, we are more connected now than ever.

Each Monash campus has its own personality, and all are friendly, welcoming communities where you'll feel at home.

- 3** INTERNATIONAL TEACHING LOCATIONS
  - ITALY Prato
  - INDIA Mumbai
  - CHINA Suzhou
- 6** CAMPUSES
  - MALAYSIA Kuala Lumpur
  - INDONESIA Jakarta
  - AUSTRALIA MELBOURNE
    - Clayton
    - Caulfield
    - Parkville
    - Peninsula
- 100+** PARTNER UNIVERSITIES AROUND THE GLOBE

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# OTHER RELEVANT INFORMATION



## BUILDING A STRONGER HIGHER EDUCATION SECTOR

As a leading education and research institution, Monash University recognises the importance of supporting the wider Australian higher education sector. Monash has made considerable contributions to the AUPN Modern Slavery Program through active participation in various working groups and having significant representation on the AUPN Modern Slavery Academic Advisory Board. This sector-level contribution by Monash is separate to the University's own modern slavery reduction and elimination program of work.

The AUPN has assembled an anti-Modern Slavery Working Group aimed at building a sector-based approach to reduce modern slavery risk by producing supporting solutions and materials to enable member universities to drive efficiencies and create opportunities to identify issues across the sector. This includes standardised contract clauses, key supplier engagement forums, and a cross-university Modern slavery Academic Advisory Board.

Three of the 10 board members are Monash academic staff members who are leading experts in employment law, criminology and international human rights matters.

The benefits of the coordinated higher education sector approach that the AUPN facilitates includes efficiencies in assessing, identifying and remediating risks across supply chains. This coordinated approach also supports bespoke reporting by individual universities depending on their situation. Work is still underway on a cross-sector approach to modern slavery risk management.

Apart from AUPN, Monash is also an active participant in a number of higher education sector initiatives.

Examples include:

- Council of Australasian University Directors of Information Technology (CAUDIT)
- Council of Australian University Librarians (CAUL)
- Tertiary Education Facilities Management Association (TEFMA)
- Australian University Senior Finance Officer Group (AUSFOG)
- Group of Eight Universities
- Universities Australia.

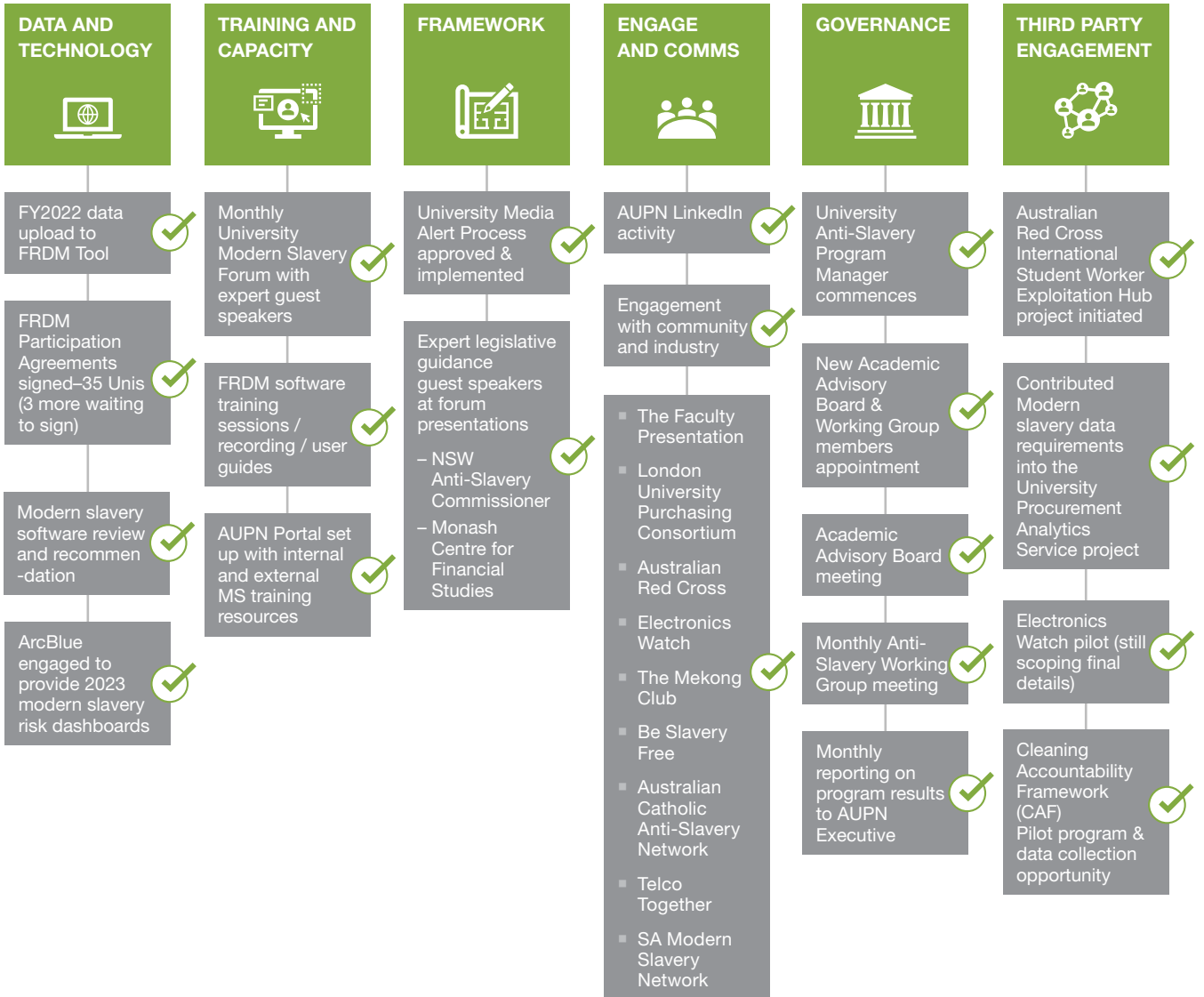
## ACKNOWLEDGEMENTS

Monash University academics contributed to the modern slavery reduction and elimination program of work, including this report:

- Monash Business School
  - » Dr Ingrid Landau, Business Law and Taxation
  - » Professor Dayna Simpson, Department of Management.
  - » Dr Nga Pham, Monash Centre for Financial Studies.
- Faculty of Arts
  - » Professor Marie Segrave, School of Social Sciences.
- Faculty of Law
  - » Associate Professor Samantha Currie, Faculty of Law.

## 2023 AUPN MODERN SLAVERY WORKING GROUP KEY ACHIEVEMENTS

### PROGRAM KEY ACHIEVEMENTS IN 2023



## 2023 PROGRAM PILLARS

### KEY AREAS OF FOCUS FOR THE PROGRAM IN 2023

<b>RISK SOFTWARE</b> 	<b>CAPABILITY UPLIFT</b> 	<b>ENGAGEMENT</b> 	<b>ISSUES / RISKS COLLABORATION</b> 	<b>THIRD PARTY PROGRAM SUPPORT</b> 
<ul style="list-style-type: none"> <li>▪ Training and training materials</li> <li>▪ University support</li> <li>▪ Data uploads and quality</li> <li>▪ Operational processes</li> <li>▪ Issue remediation</li> </ul>	<ul style="list-style-type: none"> <li>▪ Academic Advisory Board</li> <li>▪ University Modern Slavery Forums</li> <li>▪ Expert insights</li> <li>▪ Sector risk insights</li> </ul>	<ul style="list-style-type: none"> <li>▪ Resources for stakeholder engagement</li> <li>▪ External collaborations</li> <li>▪ Presentation to university stakeholder groups</li> </ul>	<ul style="list-style-type: none"> <li>▪ Supplier questionnaires and analysis</li> <li>▪ Subgroups to act on category risks and issues</li> <li>▪ Media alert action collaboration</li> </ul>	<ul style="list-style-type: none"> <li>▪ Cleaning Accountability Framework (CAF)</li> <li>▪ Electronics Watch review</li> <li>▪ Australian Red Cross – international student risk</li> <li>▪ Others</li> </ul>

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# ADDENDUM





## Modern Slavery ACT 2018 (Cth) – STATEMENT ANNEXURE

### Principal Governing Body Approval

This Modern Slavery statement was approved by the *principal governing body* of

Monash University (ABN 12 377 614 012)

as defined by the *Modern Slavery Act 2018* (Cth)<sup>1</sup> ('the Act') on


19 June 2024

### Signature of Responsible Member

This Modern Slavery statement is signed by a *responsible member* of

Monash University Council

as defined by the Act<sup>2</sup>:



President and Vice-Chancellor Sharon Pickering is the responsible member.

### Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

MANDATORY CRITERIA	PAGE NUMBER/S
a) Identify the reporting entity.	a) 15, 23
b) Describe the reporting entity's structure, operations and supply chains.	b) 19-27, 31
c) Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	c) 11-12, 24, 33-38
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	d) 8, 11-12, 36-38, 40-48, 52-53
e) Describe how the reporting entity assesses the effectiveness of these actions.	e) 8, 13, 51-53
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	f) 22-23, 31, 47-48, 55-56
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	g) 59-63

1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign Modern Slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

## CONTACT DETAILS

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