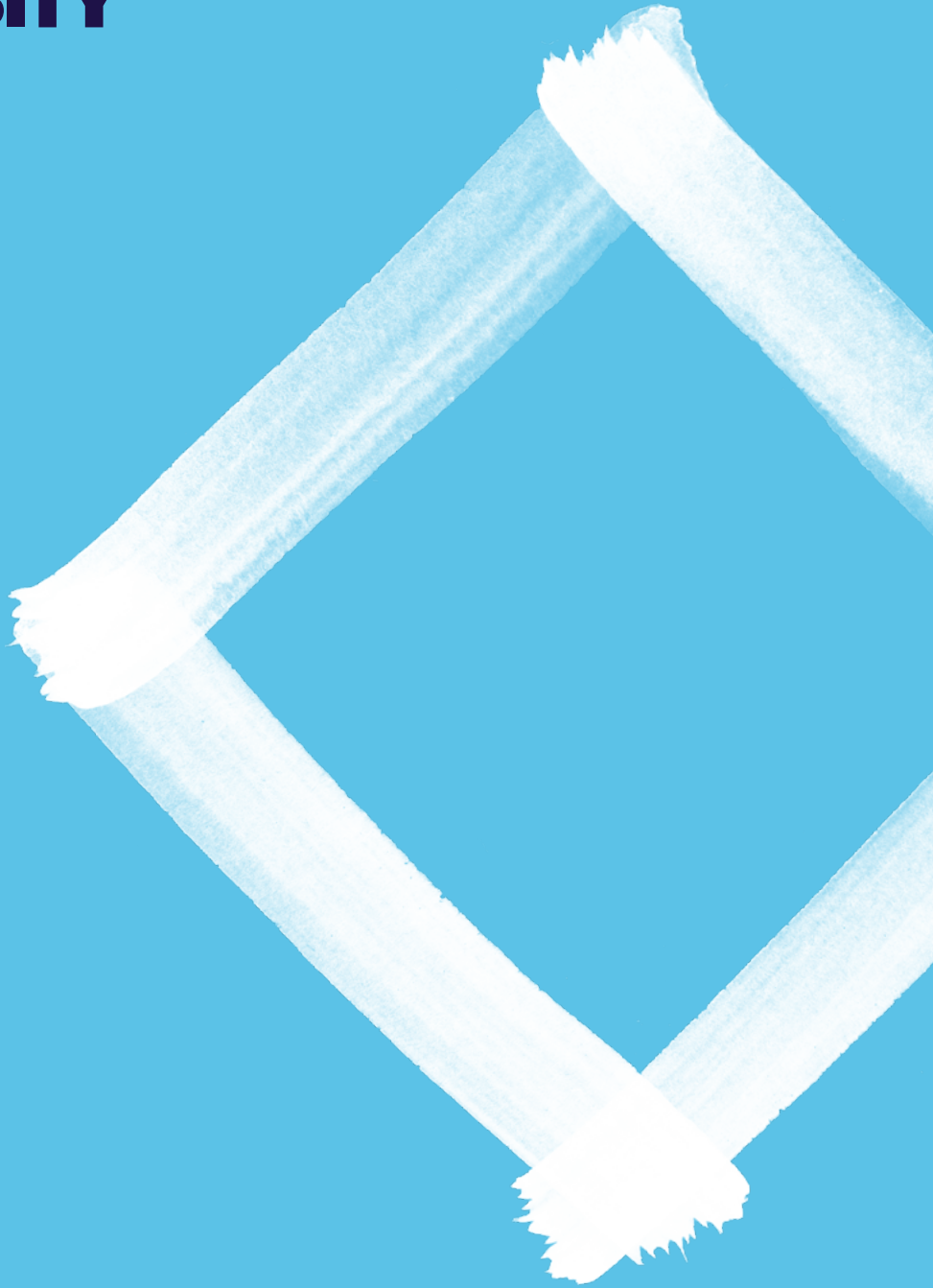


**VICTORIA
UNIVERSITY**



2025 Modern Slavery Statement



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Introduction

Victoria University's approach to addressing modern slavery

VU recognises that the presence of modern slavery in global and domestic supply chains is an unacceptable violation of human rights. Our response to modern slavery is guided by our institutional commitment to Protecting Country a principle rooted in Aboriginal knowledge systems that encompasses caring for people, communities, culture, and the environment. Addressing modern slavery is therefore both a moral responsibility and a strategic priority for VU.

We acknowledge that modern slavery disproportionately affects vulnerable communities, including Indigenous peoples globally, and undermines justice, dignity, and equality, all of which are central to the values embedded in Protecting Country. As a university that is proud of its partnerships with Aboriginal and Torres Strait Islander communities, and as a signatory to the UN Sustainable Development Goals (SDGs), we are committed to using our influence, knowledge, and resources to challenge and prevent exploitation.

VU's Protecting Country commitment drives us to operate ethically, build just systems, and prioritise relationships that honour human rights. By embedding anti-slavery actions across our procurement, teaching, research, and community engagement, we align with the principle that Country includes people and that all people deserve safety, respect, and freedom from exploitation.

What is modern slavery?

Modern slavery describes serious forms of exploitation in which people are controlled or compelled to work or live through force, threats, or deception, and are unable to leave. These practices include:

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

VU recognises modern slavery as a critical global challenge and is committed to taking meaningful action to prevent and address related risks within its operations and supply chains.

Our commitment

The University's commitment includes:

- ◆ Upholding and promoting human rights
- ◆ Engaging ethically with all suppliers, contractors, and business partners
- ◆ Identifying, evaluating, and mitigating modern slavery risks
- ◆ Taking active steps to encourage positive and responsible practices in areas where the University has influence

Modern slavery risk areas

Risks of modern slavery may occur across different contexts, including:

- ◆ Supplier Risk – Suppliers or partners that have failed to comply with modern slavery legislation or ethical labour standards
- ◆ Supply Category Risk – Industries commonly associated with higher risk, such as textiles, electronics, cleaning services, agriculture, extractive industries, and fishing
- ◆ Country Risk – Regions with higher vulnerability due to factors such as weak labour laws, political instability, or widespread poverty

Scope of this statement

This statement is made by Victoria University in accordance with the *Modern Slavery Act 2018* (Cth) and relates to the reporting period for the 2025 calendar year.

Do you need to report a concern about modern slavery within Victoria University's operations or supply chain?

VU encourages staff, students and others (including organisations or companies who have dealings with VU) to raise concerns about potential modern slavery in the first instance, via email to Director.Procurement@vu.edu.au. Concerns raised will be investigated as it relates to VU's operations and/or supply chains, following the processes outlined in the Complaints Policy & Procedures, as relevant.

Students needing support

Support for students

Student support and assistance is available via the [VU App](#) or by calling +61 3 9919 6100.

Support for staff 2025

[The VU EAP](#) (employee assistance program) service provides free and confidential counselling for all staff and their immediate family members. Staff can contact EAP on 1300 687 327 or email eap@convergeintl.com.au



A smoking ceremony on Wurundjeri Woi Wurrung land for the Footscray Park Open Day.



Country is alive.

Country is here and now and not some relic of the past.

We acknowledge and pay our deep respect to the Ancestors, Elders, and families of the Traditional Owners on all of our campuses.

At Victoria University (VU) we honour Indigenous cultures. Everything we do and every decision we make is underpinned by a commitment to Protecting Country.

Country is both a place of belonging and a way of believing, as well as contributing to the conservation of critical environmental and diverse cultural assets.

It is a community-driven movement towards long-term social, cultural, physical, and economic prosperity and sustainability.

About us

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

Victoria University (VU) (ABN 83 776 954 731) has a longstanding history of delivering accessible and inclusive education, with more than 100 years of service to communities in Melbourne's west and beyond. VU operates across multiple campuses in Melbourne's western suburbs and the city, as well as interstate at VU Sydney and VU Brisbane¹. The University also delivers education programs internationally through partnerships with institutions across Asia.

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

Victoria University is a dual sector institution, offering a comprehensive range of qualifications across vocational education and training (VET), undergraduate and postgraduate coursework, and higher degree research programs. This dual sector model supports flexible learning pathways, multiple entry and exit points, and enhanced education and employment outcomes for students.

A key feature of VU's approach to learning and teaching is the VU Block Model®, under which students study one subject at a time in focused study blocks. This model emphasises small, interactive classes and timely feedback, supporting improved student engagement and academic success. Victoria University was the first institution in Australia to implement the Block Model at scale and is now the largest provider globally delivering this mode of learning.

With more than seven years of exclusive Block Model delivery, VU has observed sustained improvements in student retention, completion, and satisfaction, reinforcing the University's commitment to student centred learning, equity, and academic excellence.

Victoria University is ranked among the top three per cent of universities worldwide and is recognised for its applied, impactful research addressing challenges related to people, place, and planet. Through its teaching, research, and operations, VU strives to act responsibly and ethically, including in identifying and addressing modern slavery risks within its activities and supply chains.

¹ Victorian campuses: City, Footscray Park, Footscray Nicholson, St Albans, Sunshine & Werribee

\$616.9m

Consolidated Revenue



52,656
Students



2,563
Staff



8
Campuses



3,198
Suppliers

2025 snapshot

52,656 total students

Student Equity
Participation
Rates

40.6%
OVERALL

39,571

**Higher Education
(HE) students**

13,085

**Vocational Education and
Training (VET) students**

Student Equity
Participation
Rates

36.5%
HE

Student Equity
Success
Rates

92.4%
HE

Student Equity
Participation
Rates

52.8%
VET

Student Equity
Success
Rates

82.4%
VET

41.3%

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

93.8%

success
rate

46.5% HE

and

71.3% VET

students live in
Melbourne's West

36%

of domestic students
were born overseas

13,589

International students studying at our Australian campuses

Education (QILT Student Experience Survey Results)

#2

in Victoria
for student
experience

84.2%

score for
skills
development

81.7%

score for teaching
quality and
engagement

79.1%

score for overall
educational
experience



310,000

alumni across
200 countries

Research

#6

in the world for
Sports Science
(Shanghai Ranking 2025)

#56

in the world for
Partnerships for the Goals
(Times Higher Education
Impact Rankings 2025)

17 SDGs

Published across all
UN Sustainable Development
Goals – with citations
4x the global average

NOTES:

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

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

Victoria University strategic plan 2022–28: start well, finish brilliantly

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

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

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

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

Our purpose

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

Our vision

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

Strategic drivers

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



Our vision

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

Our principles and values

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

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

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

Our governance

Governance and risk management

Victoria University's governance framework provides clear oversight, accountability, and assurance in meeting its statutory, ethical, and regulatory obligations, including those under the *Modern Slavery Act 2018* (Cth). Responsibilities are clearly defined across the University Council, Academic Board, and Executive Team in accordance with the *Victoria University Act 2010* (Vic).

Risk management is embedded within Victoria University's planning, operations, and decision making processes. The University maintains an enterprise risk management framework aligned with the Victorian Government Risk Management Framework and the Australian Risk Management Standard (AS ISO 31000:2018). This framework supports the identification, assessment, monitoring, and management of risks across the University's activities.

Oversight of strategic and enterprise risks is undertaken through regular reviews by the University Council, the Audit and Risk Committee, and the Executive Team, taking into account both internal and external operating environments. These governance bodies collaboratively oversee a Risk Appetite Statement, which articulates the level of risk the University is prepared to accept in pursuit of its strategic objectives, while upholding strong governance, ethical conduct, and compliance. This statement guides decision making across the institution.

Modern slavery risk oversight and consultation

Oversight of Modern Slavery Risk is supported by a Modern Slavery Working Group, which brings together representatives from relevant functions across the University, including procurement, legal, risk, finance, IT and academic operations.

The Modern Slavery Working Group plays a central role in coordinating the University's approach to modern slavery risk management, including:

- ◆ Identifying and assessing modern slavery risks within the University's operations and supply chains
- ◆ Supporting procurement teams to integrate modern slavery considerations into supplier due diligence, sourcing decisions, and contract management
- ◆ Reviewing supplier risk assessments, including industry, geographic, and supplier specific risks
- ◆ Supporting awareness raising and capability building activities across the University
- ◆ Contributing to the development, review, and approval of Victoria University's Modern Slavery Statements

Consultation occurs on an ongoing basis through manager staff induction, targeted training designed to build awareness of modern slavery across the University community. These activities support employees to understand modern slavery risks, recognise potential indicators, and apply the University's policies and procedures in their day to day roles.

Training is tailored to reflect different levels of responsibility and exposure to risk, with additional focus for staff involved in procurement, contract management, and supplier engagement. Through these learning and development activities, Victoria University seeks to promote a shared understanding of modern slavery risks, reinforce ethical expectations, and embed responsible practices across its operations and supply chains.

Procurement and supplier governance

Procurement and supplier governance are key components of Victoria University's modern slavery risk management approach. Modern slavery considerations are integrated into procurement policies, procedures, and supplier engagement processes to support responsible sourcing and ethical supply chain management.

The University's procurement function works closely with the buyers to apply a risk based approach to supplier assessment and management. This includes:

- ◆ Identifying higher risk procurement categories and supplier relationships
- ◆ Incorporating modern slavery considerations into supplier onboarding, evaluation, and contract requirements
- ◆ Supporting suppliers to understand and meet the University's expectations regarding ethical labour practices and compliance

These arrangements help ensure that modern slavery risks are considered across procurement activities and are aligned with the University's broader governance and risk management framework.

Enterprise risk categories

Through its enterprise risk framework, Victoria University monitors and manages a range of material risks, including:

- ◆ **External Environment Risks**
Risks arising from factors largely outside the University's direct control, such as changes in the higher education sector, government policy and funding, geopolitical developments, economic conditions, Federal and State elections, and major disruptive events including pandemics.
- ◆ **Strategic Risks**
Risks in areas where the University has influence but where consequences may be significant. These include academic quality and integrity, partnerships and third party arrangements, financial sustainability, government relations, organisational culture, delivery of major projects, foreign interference, climate change, and ethical sourcing.
- ◆ **Operational Risks**
Risks associated with day to day operations, including work health and safety, business continuity, information and records management, cyber security, legislative and regulatory compliance, workforce capability and capacity, and financial and asset management.

These risks are managed through strong governance oversight, structured enterprise planning with regular monitoring, and clearly documented policies, procedures, and internal controls. Together, these mechanisms support Victoria University's ability to manage risk responsibly and to address modern slavery risks in a proportionate and risk based manner.

Sustainability

Community tree planting

In August, VU hosted its fourth annual Community Tree Planting Day at the Werribee Campus, where over 400 volunteers planted 5,000 native trees. This effort builds on the 12,500 trees planted in previous years and is supported by the Victorian Government's *More Trees for a Cooler, Greener West* initiative. The program enhances biodiversity, contributes to carbon capture, promotes urban cooling, and restores local ecosystems – reinforcing VU's commitment to environmental stewardship.

Refurbishments for good

VU is refurbishing and retrofitting its buildings to reduce environmental impact, improve efficiency and extend asset life. Through the Asset Consolidation and Workplace Plan, the University upgraded 32 learning spaces, modernised libraries, and delivered flexible, contemporary work environments. This work transforms ageing assets into sustainable, future-ready spaces and consolidates under-used areas to support modern ways of working and smarter space utilisation.

Embedding environmental risk in governance

VU has introduced a new enterprise risk category – Environmental Sustainability and Protecting Country – to ensure environmental and cultural considerations are embedded in strategic decision-making. Developed in collaboration with Moondani Balluk, this initiative integrates ecological and First Nations values into governance, strengthening alignment with sustainability goals.

Renewable energy procurement

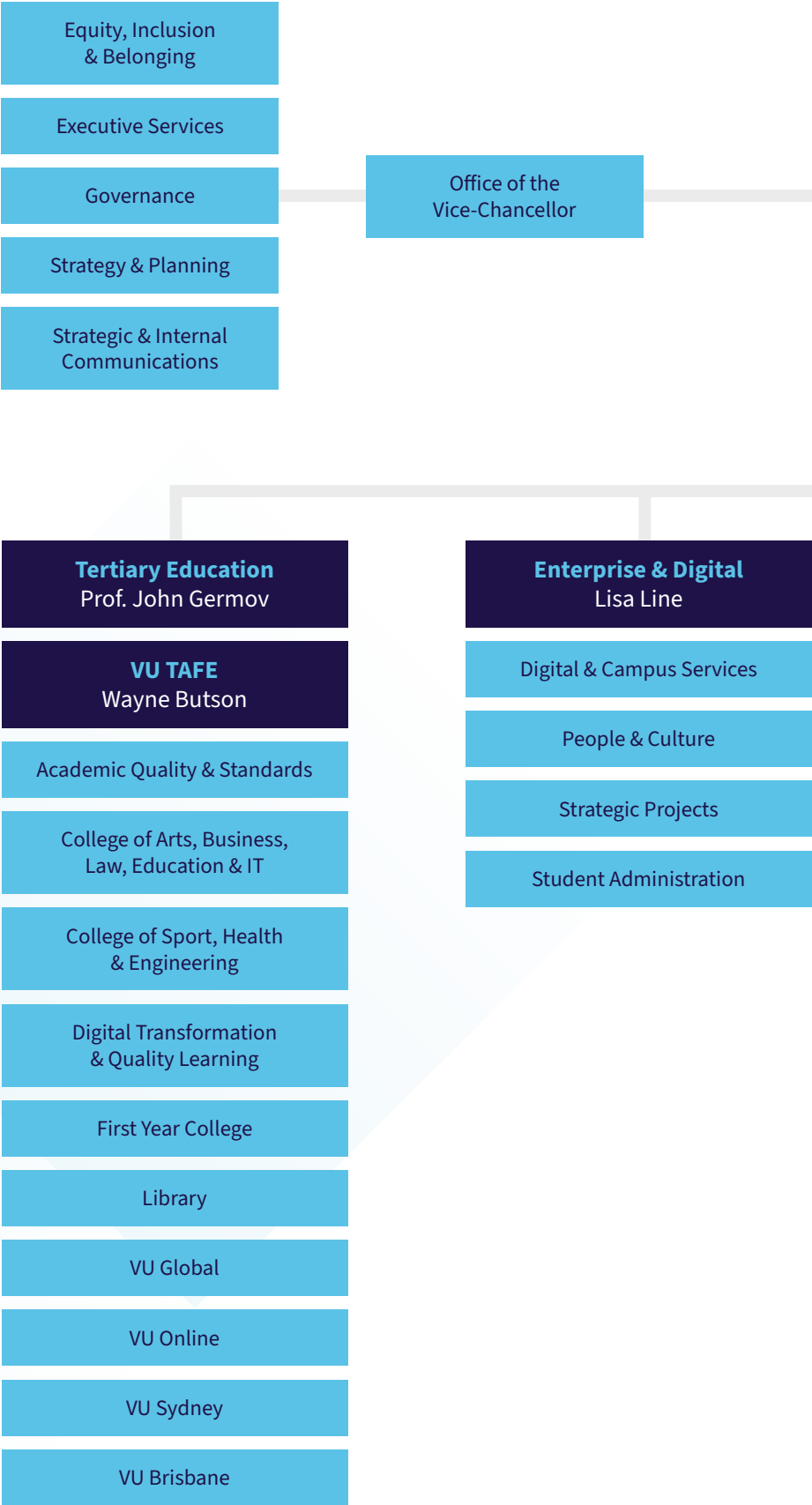
VU is securing its next large-scale energy contract to maintain 100% renewable electricity supply beyond June 2026. This procurement, conducted through the Business Renewables Buying Group, leverages collective purchasing power to deliver cost-effective renewable energy solutions.

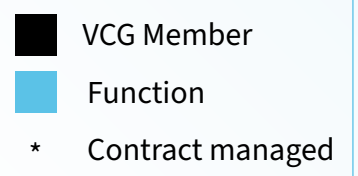
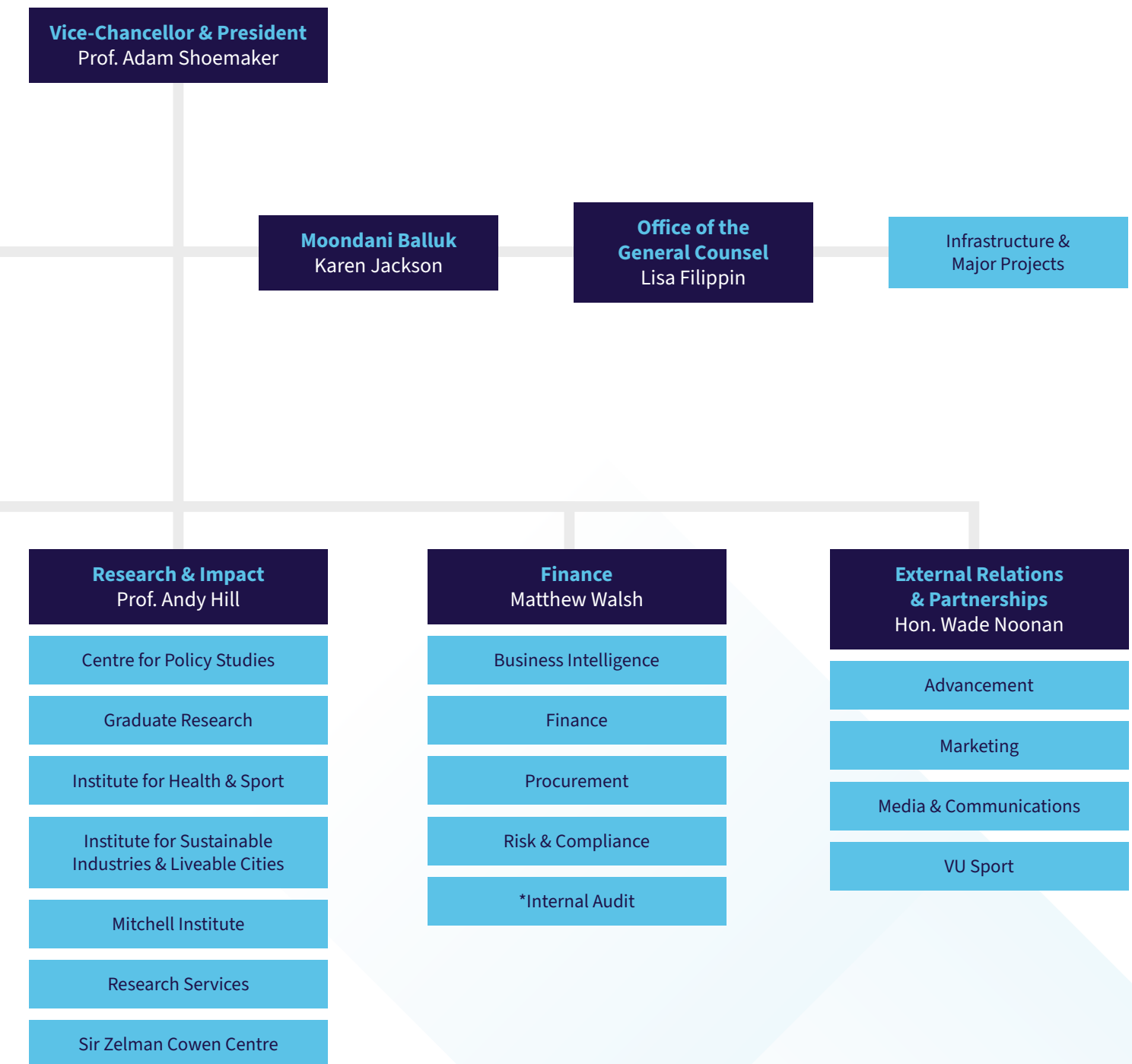
Infrastructure and technology transformation

VU is modernising infrastructure and technology to improve efficiency and reduce emissions. This has included: network modernisation to reduce our hardware footprint and carbon emissions; cloud transition; an asset replacement program (gas boilers to heat pumps), and continued upgrades to electrical switchboards, LED lighting, and heating/ cooling systems. These investments ensure VU's campuses become cleaner, smarter and better equipped to meet the demands of a sustainable future.

Organisational chart

The following chart depicts the University structure as of 31 December 2025.





Workforce



2,563 Total staff

including ongoing, fixed term, casual and sessional

1.6% SELF DESCRIBED

37.1% MEN

61.4% WOMEN

1.3% FIRST NATIONS

Employment and conduct principles

VU's community is proudly diverse and we are committed to providing a values-based culture focused on safe, inclusive, respectful, and productive workplace behaviours. This ensures we attract, develop and retain a diverse workforce, and become a destination university for emerging talent.

The Appropriate Workplace Behaviour Policy guides staff to make the right choices. It establishes core professional and behavioural expectations. These values shape how colleagues can expect to be treated when working together. This policy is underpinned by other associated policies and procedures, including:

- ◆ Recruitment and selection
- ◆ Discrimination and harassment
- ◆ Disability and accessibility
- ◆ Bullying prevention and management
- ◆ Diversity, inclusion and equal opportunity; staff complaints resolution
- ◆ Safety through conflict-of-interest management
- ◆ Health, safety and wellbeing.



1,878 Full time equivalent

including ongoing and fixed term

1131 Professional

740 Academic

includes VET teaching staff

7 Senior Management

Together they ensure that all people decisions are made in line with the principles of equity, fairness, and transparency.

The Gender Based Violence Prevention and Response Plan 2026-2029 further embeds our commitment to respect. The Plan responds to and reflects the lived experiences of our students, staff and broader community. This is a whole-of university undertaking that recognises that meaningful change requires more than policy – it demands a sustained commitment to education, prevention, partnership and response.

We will continue to drive action and progress, so every person at VU can thrive.

Procurement operations and supply chain risks

Victoria University (VU) operates under a centralised procurement model governed by its Purchasing Policy and Procedure, which enables consistent oversight of procurement activities and supplier engagement across the institution. This model supports greater visibility of supply chain risks, including risks of modern slavery, by consolidating procurement decision making and supplier management within a central function.

VU sources goods and services across a wide range of operational areas to support teaching, research, student services, facilities management, and corporate functions. As a large and complex organisation, the University recognises that modern slavery risks may arise within its supply chains, particularly where goods or services involve:

- ◆ Labour intensive service provision
- ◆ Multi tiered or opaque supply chains
- ◆ High risk industries or sectors
- ◆ Offshore production or sourcing from jurisdictions with weaker labour protections

The central Procurement function is responsible for strategic sourcing activities on behalf of the University, including establishing and managing centrally contracted suppliers. This approach assists VU in identifying areas of heightened supply chain risk and applying a risk based approach to procurement and supplier oversight.

The supply chain analysis in this statement includes VU's wholly owned subsidiary VU Online Pty Ltd (ABN 17 623 496 186).

Higher risk procurement areas

Modern slavery risks are more likely to be present in certain categories of goods and services procured by the University. These may include, but are not limited to:

- ◆ Cleaning, security, and facilities management services
- ◆ Construction, maintenance, and capital works
- ◆ Information technology and electronics
- ◆ Apparel and merchandise
- ◆ Catering, food services, and hospitality inputs

These risk areas are influenced by factors such as subcontracting arrangements, labour practices, sourcing of raw materials, and geographic location of production or service delivery.

Ethical procurement principles and risk awareness

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

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

Procurement operations and supply chain risks (cont.)

Preferred supplier model and risk concentration

Victoria University utilises a preferred supplier model for frequently purchased goods and services, primarily managed through Procurement, Campus Services, and Marketing. Preferred suppliers are appointed through competitive procurement processes and are engaged under centrally managed contractual arrangements.

While this model supports efficiency and value for money, it also plays a critical role in managing modern slavery risks by:

- ◆ Reducing reliance on ad hoc or unvetted suppliers
- ◆ Concentrating spend with approved suppliers subject to University requirements
- ◆ Improving the University's ability to identify, assess, and respond to supply chain risks
- ◆ By limiting procurement to approved supplier panels where possible, VU strengthens oversight of supplier

practices and reduces exposure to unmanaged modern slavery risks within its supply chains.

2025 spend profile

Victoria University continues to take active steps to identify, assess, and manage modern slavery risks within its procurement activities and supply chains. During the 2025 reporting period, the University undertook a structured analysis of its procurement expenditure using the ArcBlue Modern Slavery Risk Assessment Tool, developed by ArcBlue, a Bain & Company business. This assessment

Table 1: Spend by category

Row Labels	Proportion of Spend	Spend	Count of Suppliers
Corporate professional services	13.0%	30,177,146	253
Marketing & events	11.6%	27,072,316	289
Buildings & grounds	11.4%	26,618,451	141
Property management	9.9%	23,110,713	8
Construction, refurbishment & works	7.6%	17,748,557	23
IT maintenance & support services	7.0%	16,212,241	66
Student services	6.0%	14,043,206	1222
Regulatory fees & government charges	5.3%	12,435,499	20
Recruitment / contingent labour / advertising	3.6%	8,407,654	24
Educational partnerships	3.1%	7,320,040	14
Library services	3.0%	7,080,465	91
Laboratories & research	2.9%	6,735,047	163
IT software	2.7%	6,180,899	46
Not categorised	2.6%	6,061,381	636
Energy & utilities	2.4%	5,589,103	10
End user computing	1.2%	2,897,137	6
Telecommunications	1.1%	2,614,941	10
Travel & fleet	0.7%	1,636,887	25
Sponsorships	0.7%	1,518,079	15
IT software licences & subscriptions	0.6%	1,462,863	23
Universities (payments to)	0.6%	1,345,317	11
IT network hardware	0.5%	1,128,761	4
Bank fees & charges	0.4%	916,257	4
Stationery, office supplies & clothing	0.3%	769,395	12
Copyright	0.3%	693,883	5
Managed print services	0.3%	631,709	8
AV equipment	0.2%	519,882	11
Logistics & storage	0.2%	448,285	8
Cloud services	0.2%	428,162	5
Infrastructure as a Service (IaaS)	0.2%	418,569	1
Lecturer & teaching expenses	0.1%	336,804	11
Training & development	0.1%	240,198	22
Specialist services (research & medical)	0.1%	145,668	10
ICT software programming & development	0.0%	4,000	1
Grand Total	100.0%	232,949,513	3,198

formed a key component of the University’s broader modern slavery risk identification and mitigation activities.

The ArcBlue tool applies recognised external data sources, including the 2025 Global Slavery Index, RESPECT (Responsible and Ethical Private Sector Coalition Against Trafficking), and guidance issued by the NSW Anti-Slavery Commissioner on reasonable steps to address modern slavery risks. It enables a risk based assessment of procurement spend by reference to geographic location, procurement category, and supplier specific risk indicators. This approach assists the University in prioritising areas for further scrutiny and targeted action.

In 2025, Victoria University recorded total procurement expenditure of \$232.9m across 3,198 suppliers, excluding credit card transactions. Of these suppliers, 277 recorded annual expenditure exceeding \$100,000, with approximately 48% of total spend concentrated among the top 25 suppliers. This concentration of spend provides the University with greater leverage to influence supplier practices and focus engagement and risk mitigation

efforts within a smaller cohort of higher value suppliers.

In addition to centrally managed procurement, the University incurred \$3.5m in credit card expenditure across 15,945 transactions. The largest categories of credit card spending were Travel & Accommodation, Catering/Meals, Fees & Subscriptions and Staff Development account for 55% of total credit card expenditure. Victoria University recognises that credit card transactions present inherent challenges for modern slavery risk assessment, particularly due to limitations in merchant data, including incomplete information regarding supplier identity, ownership, and geographic location. As a result, the University continues to improve the quality of credit card reporting and oversight to enhance visibility of potential risks over time.

Interpretation of risk exposure

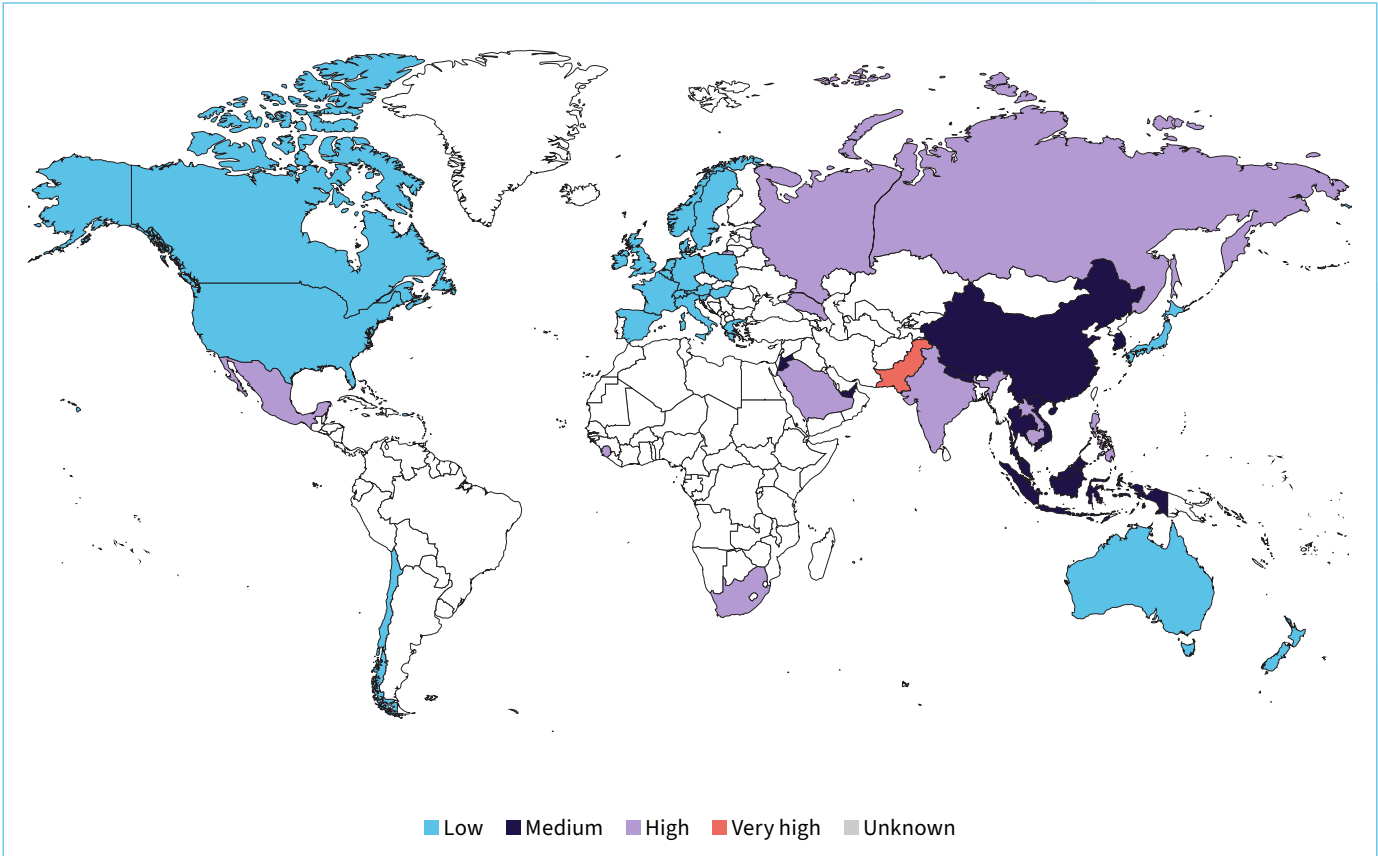
The University’s procurement spend profile indicates that modern slavery risk exposure is primarily concentrated within specific procurement categories and supplier cohorts, particularly those associated

with labour intensive services, complex supply chains, or offshore production. The concentration of spend among a limited number of high value suppliers enables a targeted, risk based approach to supplier engagement and oversight. Conversely, lower value and transactional expenditure, including credit card use, represents a more diffuse area of potential risk and remains a focus for ongoing improvement in monitoring and control mechanisms.

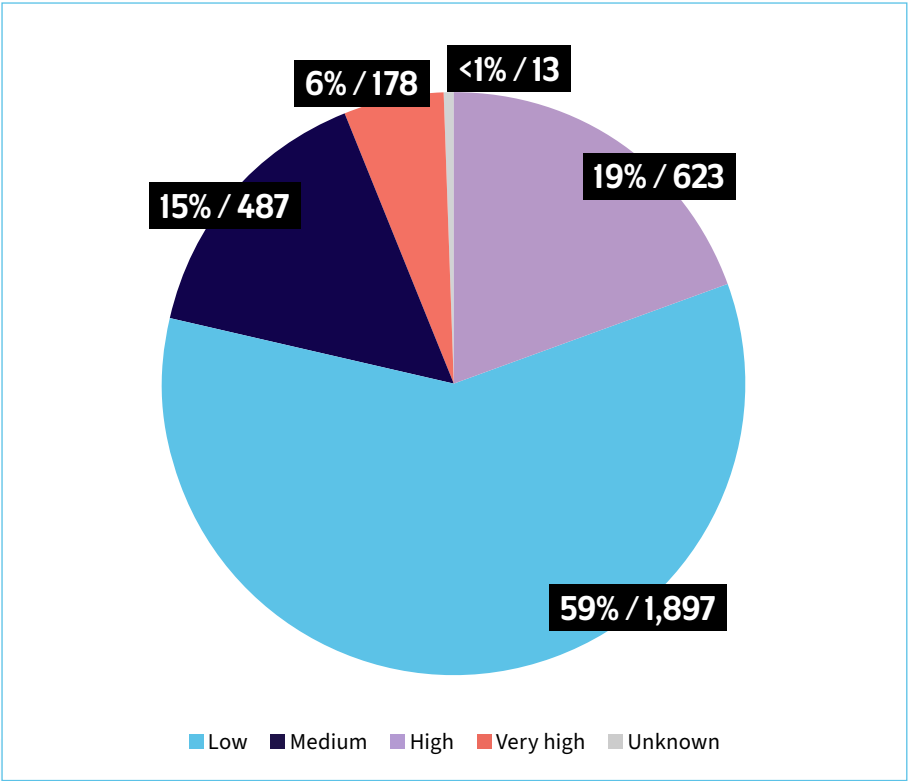
Table 1 provides a detailed breakdown of Victoria University’s procurement expenditure by category for the 2025 reporting period, excluding credit card transactions.

Using the Modern Slavery Risk Assessment Tool, supplier risk was identified by country. **Graph 1** outlines Victoria University’s suppliers in 2025 and highlights their exposure to varying levels of modern slavery risk.

Graph 1: Global view of suppliers and risk levels



Graph 2 All Supplier Risk Rating Levels



Graph 2: Using a combined assessment of spend category and country risk, the Modern Slavery Risk Assessment Tool identified 178 unique suppliers (6% of total suppliers) as very high risk, and 623 unique suppliers (19%) as high risk for modern slavery. The majority of VU suppliers (59%) were assessed as low risk.

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

Victoria University spend with international suppliers was \$16.68m or 7.2% of total university spend in 2025.

Victoria University’s procurement practices aim to address modern slavery risks within its supply chain through structured risk assessment processes and targeted, proactive strategies. The University remains committed to ongoing monitoring of identified higher risk categories and to taking proportionate and appropriate actions to mitigate modern slavery risks across its operations and supply chains.

Risks identified in Victoria University’s operations and supply chain

Victoria University’s (VU) supply chain includes a mix of domestic and international suppliers, with procurement activity spanning 132 distinct spend categories during the 2025 reporting period. Given the scale and complexity of the University’s operations, the identification of modern slavery risks requires a structured, risk based assessment that considers multiple dimensions of potential exposure. Consistent with previous reporting periods, VU’s analysis focuses on three primary risk lenses:

- ◆ Supplier risk,
- ◆ Procurement category risk, and
- ◆ Country and geographic risk.

The 2025 assessment identified 801 suppliers across 100 procurement categories assessed as presenting a higher inherent risk of modern slavery. These risk classifications reflect factors commonly associated with elevated modern slavery exposure, including labour intensive production or service delivery, complex and multi-tiered international

Table 2: International payments by country

Country	Spend	Companies	Spend Categories
Singapore	5,261,595	13	Educational Partnerships, Electronic Resources & Databases, Memberships, Physical Books & Journals, Platform as a Service (PaaS), Professional Subscriptions, Student Recruitment (International)
United States of America	5,151,317	40	IT Server Hardware, Payroll, Content Streaming, Course Development & Accreditation & Expert Advice Services, Educational Partnerships, Electronic Resources & Databases, Memberships, Physical Books & Journals, Professional Subscriptions, Promotional Items & Merchandise, Scientific Equipment, Software as a Service/Subscription (SaaS), Software Licences (not SaaS), Strategy And Analysis, Training & Development
India	768,479	25	Audio & Video Equipment, Conference Attendance Fees, Market Research, Memberships, Sponsorships, Student Recruitment (International), Subject Matter Specialist (Business)
United Kingdom	752,889	26	Electronic Resources & Databases, Media & Advertising, Physical Books & Journals, Software as a Service/Subscription (SaaS), Software Licences (not SaaS), Student Recruitment (International), Content Streaming, Software as a Service/Subscription (SaaS)
Netherlands	614,757	7	Electronic Resources & Databases, Physical Books & Journals, Platform as a Service (PaaS), Software Licences (not SaaS)
China	573,852	26	Accommodation, Conference & Exhibition Hosting Fees, Conference Attendance Fees, Corporate Insurances, Electronic Resources & Databases, Medical And Lab Consumables, Sample Testing Services, Student Support, Student Recruitment (International), Subject Matter Specialist (Business), Subject Matter Specialist (Research)
Ireland	558,895	3	Software Licences (not SaaS)
Germany	431,258	6	Educational Partnerships, Professional Subscriptions, Software Licences (not SaaS), Student Recruitment (International)
Hong Kong, Special Administrative Region of China	261,123	10	Conference & Exhibition Hosting Fees, Sample Testing Services, Student Recruitment (International)
Vietnam	248,836	10	Awards & Gifts, Student Recruitment (International)

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

supply chains, and reliance on lower skilled or vulnerable labour in certain industries.

When considered alongside the University's procurement spend profile, these findings indicate that modern slavery risk is concentrated within specific categories and supplier cohorts rather than being evenly distributed across the supply chain. This aligns with the University's expenditure analysis, which shows a significant proportion of total procurement spend consolidated among a smaller number of higher value suppliers, providing greater opportunity for focused engagement and oversight.

These risk identification outcomes directly inform the actions taken by Victoria University to assess and address modern slavery risks. In particular, the identification of higher risk categories and suppliers supports a prioritised, risk based approach to:

- ◆ supplier assessment and review activities,
- ◆ the application of procurement and contractual controls,
- ◆ targeted engagement with suppliers operating in higher risk areas, and
- ◆ internal capability building and awareness initiatives for relevant staff.

At the same time, the University acknowledges that lower value and transactional procurement, including dispersed supplier relationships, may present different challenges for visibility and control. As described further in the actions taken section, these areas remain a focus for ongoing improvement in monitoring, reporting, and procurement practices.

The outcomes of this analysis are used to guide continuous improvement in the University's procurement framework and modern slavery response, ensuring that actions taken are proportionate to identified risks and aligned with Victoria University's broader governance and ethical commitments.

Through a structured supply chain mapping process, Victoria University identified a number of procurement categories within its operations that present an elevated risk of modern slavery. Each category was evaluated using a risk based methodology that considered relevant indicators such as geographic location, sourcing of materials, labour practices including wage arrangements, and prevailing industry conditions.

Analysis of country risk

Analysis of country based risk identified 164 suppliers assessed as presenting high or very high modern slavery risk due to the geographic location of their operations. Collectively, these suppliers accounted for 6% of Victoria University's total procurement spend, with 0.88% of this expenditure associated with International Student Recruitment activities. While the overall spend exposure is limited, the presence of activity in higher risk jurisdictions reinforces the need for ongoing monitoring and a proportionate, risk based approach to oversight in these areas.

Table 3: High risk spend categories

Category & Spend	Risk Type	Assessment of Risk
Construction (\$17.75m)	Materials manufacturing	VU recognizes the modern slavery risks in both raw materials and finished products used in construction projects. The tendering process includes a thorough assessment of contractors to ensure appropriate controls are in place to mitigate modern slavery risks. VU aligns with the Local Jobs First Act 2003 for state government funding construction projects, which prioritizes local content before sourcing materials from international suppliers. In 2024 & 2025, Victoria University commenced two Local Jobs First Standard projects with total grant funding of \$23.26 million. Both projects are in Metropolitan Melbourne, with an average commitment of 97% local content for professional services. During 2025 one construction contract was procured with a commitment of 91% minimum local content. By procuring local content the modern slavery supply chain risk is minimised.
IT software & services (\$17.4m)	Location of spend	90% of software in 2025 was sourced from Australian suppliers, with the top 10 purchases [Desire2learn Australia, Oracle, SoftwareOne, NTT Australia, SFDC Australia, Careerhub, Technology One, Qualtrics LLC, Exemplar Learning, One Diversified] totalling \$11.3m. VU considers domestic software procurement low risk. However, it acknowledges that some software may be resold through Australian resellers representing international companies. Further analysis on international software purchases is provided in Table 4 .
Recruitment (\$8.06m)	Wages and conditions	Temporary labour is sourced through a contracted panel of recruitment firms operating in Australia. Non-panel firms must meet the same compliance requirements, including rate and fee transparency and registration with the Labour Hire Authority. Given these controls, the modern slavery risk in this category is considered low.
Commercial cleaning (\$5.05m)	Wages and conditions	The cleaning and security industries are widely recognised as high risk sectors for modern slavery. VU's tender processes require all contractors to demonstrate compliance with relevant labour laws and the Modern Slavery Act.
Security equipment & services (\$4.34m)	Wages and conditions	VU acknowledges the risk associated with security services, particularly concerning wages and working conditions. VU requires suppliers in the security category to participate in payroll compliance audits as part of the contract compliance.
Laboratories & research (\$1.47m)	Wages and conditions	65 suppliers classified as providing chemicals and consumable products including personal protective equipment (PPE). VU recognises that this category is high risk of wage and condition in equality. The manufacture of laboratory and PPE is recognised as a higher risk category for modern slavery, due to global supply chains, reliance on migrant labour, and known industry wide risks associated with recruitment practices. VU will continue to manage risks in this category by procuring through established suppliers, monitoring disclosures and industry developments, and incorporating learnings into ongoing procurement and risk management practices.
Uniforms & clothing (\$238k)	Wages and conditions	Uniforms are recognised as a high risk category for modern slavery due to the complexity of global textile supply chains and known labour vulnerabilities. In selecting VU's preferred supplier, VU took into account the supplier's advanced supply chain management practices, which are designed to identify, assess, and mitigate modern slavery risks across their operations and extended supply chain.

Table 4: High risk international spend categories

Supply Categories	Total Supplier (\$ International)	Suppliers Rated High & Very High Risk (\$ International)	% of Total	Assessment of Risk
Student Recruitment (International)	2,343,056	2,050,132	87%	VU engages both domestic and international student recruitment agencies. While due diligence processes are in place to assess new agents, VU acknowledges the opportunity to further strengthen these arrangements to better safeguard students and minimise potential risks. International student recruitment is undertaken through a combination of Australian based companies and overseas organisations, with total expenditure of \$16.15 million. This highlights the importance of holding all international agents, irrespective of location, to consistent and robust standards of compliance with modern slavery obligations. As an initial measure, VU has updated its contracts to include obligations for recruitment agents to comply with Modern Slavery laws.
Software as a Service/ Subscription (SaaS)	275,354	275,354	100%	VU spent \$17.4 million on software, including Software as a Service and non SaaS products, during the reporting period, with 90.7% of this spend directed to local Australian suppliers. This significantly reduces exposure to modern slavery risk. The remaining spend related to international suppliers, with approximately 98% sourced from countries assessed as low risk. One software product supporting ultrasound technology, representing approximately 0.2% of international spend, was sourced from a country assessed as medium risk. While software development is generally considered a low risk industry, VU recognises the potential for hidden labour exploitation where work is outsourced through complex subcontracting arrangements. The modern slavery risk assessment tool rated software as a high risk category overall due to sector wide risk factors, however no specific VU software suppliers were identified as having a high risk of modern slavery in their operations or supply chains. Based on this assessment, VU considers the current risk of modern slavery in its software supply chain to be low and will continue to monitor and manage this risk through its procurement and due diligence processes.
Software Licences (Not SaaS)	1,326,110	1,326,110	100%	

Measuring our effectiveness

(Reporting against actions stated in the 2024 Modern Slavery Statement)

Victoria University is committed to assessing the effectiveness of its actions to identify, prevent, and mitigate modern slavery risks.

The Modern Slavery Working Group supports effectiveness by:

- ◆ Monitoring procurement related controls, such as supplier risk assessments and due diligence processes
- ◆ Identifying gaps, emerging risks, and opportunities for improvement
- ◆ Informing continuous improvement initiatives and updates to policies and procedures

Progress and completed actions during 2024

1. VU policies & procedures

Planned Action:	Completed Action:
Develop and include Modern Slavery Commitment Plans in tender documentation, enabling suppliers to outline specific actions and commitments in alignment with VU’s modern slavery obligations.	Completed and embedded in tender processes Ongoing review to balance the importance of supplier commitments and the efficiency of tender processes for both suppliers and VU.
Finalise and publish the Supplier Code of Conduct (drafted in 2024), incorporating key obligations under the Modern Slavery Act for all suppliers.	VU finalised and published in August 2025 its first Supplier Code of Conduct statement, incorporating key obligations under the Modern Slavery Act for all suppliers. This document is available on the VU public website ‘Information for Suppliers’ and queries from new suppliers are directed to this site.

2. Supplier engagement & assessment

Planned Action:	Completed Action:
Engage with suppliers across identified high-risk categories to complete Supplier Assessment Questionnaires (SAQs), including: ◆ Software Licences ◆ Cleaning Services ◆ Security Services ◆ Agency Contractors & ◆ Temporary Workers	During 2025 27 tenders were undertaken which included Modern Slavery assessments of 174 suppliers. Categories tendered included Construction, Security, Cleaning, Recruitment, Software, HR services, Financial and Marketing Services. 32 suppliers who were assessed as low risk in regards to Modern Slavery risk management were appointed as suppliers to VU. ◆ SAQs specifically sent to 11 high risk suppliers (IT & Security) ◆ 4 companies did not respond & were followed up ◆ 2 companies stated they did not provide specific details to clients and instead referred to their Modern Slavery Statements ◆ 5 companies (4 IT and 1 Security) completed SAQs

Planned Action:	Completed Action:																											
Suppliers identified as having a high overall risk of modern slavery will be required to submit a formal commitment plan.	During 2025, the focus of modern slavery activity was on implementing a risk based approach to supplier oversight, including establishing clear expectations for suppliers assessed as having a higher overall risk of modern slavery. This action required that any supplier identified as high risk would be required to submit a formal commitment plan outlining how modern slavery risks are identified, managed, and remediated. Supplier risk assessments and self assessment questionnaires (SAQs) completed during the year confirmed that all suppliers within the higher risk cohort had existing policies, governance frameworks, and operational controls aligned to modern slavery legislative requirements. These included modern slavery or human rights statements, supplier codes of conduct, ethical recruitment practices, and active monitoring and audit processes across their own supply chains. Based on this assessment, no suppliers were identified as requiring an immediate additional formal commitment plan in 2025, as existing documentation and demonstrated practices were assessed as sufficient to address identified risks. In effect, the suppliers current policies, public disclosures, and ongoing compliance activities served as an implicit commitment to managing modern slavery risks. To ensure this action remains effective and responsive to changing risk profiles, suppliers assessed as higher risk will continue to be closely monitored. Where future assessments identify gaps, elevated risk, or changes to operating conditions, suppliers will be required to provide a formal commitment plan detailing corrective actions, timeframes, and accountability mechanisms. Updated assessments and disclosures are scheduled for review in 2027 to confirm continued alignment with expectations and legislative requirements. Overall, the 2025 outcome demonstrates that the action has been implemented as intended, with a clear mechanism in place to require formal commitment plans should higher or unmanaged modern slavery risks be identified in future reporting periods.																											
Review and update the International Education Assessment Form to include specific references to modern slavery risks in the recruitment checklist for international student agents.	VU added compliance to the Modern Slavery Act into the agent contracts. 24. MODERN SLAVERY ACT 24.1. VU is a reporting entity as defined in the <i>Modern Slavery Act 2018</i> (Cth) (MS Act). In the conduct of its activities and in managing its supply chain the Agent shall hold itself to the highest ethical standards, and warrants it will not engage in any activity, practice or conduct which may involve human trafficking, slavery and slavery like practices, forced labour, the sale or exploitation of children, debt bonded labour or other exploitative practices, either directly or indirectly. The Agent must not breach or cause VU to be in breach of the provisions of the MS Act.																											
Participate in the Electronics Watch pilot program, promoting worker driven, independent monitoring of modern slavery risks in ICT supply chains.	Electronics Watch (EW) helps public buyers work together to identify exploitation in factories via ongoing work monitoring. They provide worker education, negotiation with factory owners for better working in global electronics supply chains and regular monitoring reports for buyers. VU participated as part of the pilot program in a coordinated sector wide engagement to address identified issues in the electronics supply chain, representing the first global trial of its kind with Electronics Watch. <table><tr><th>Metric</th><th>VU Result</th><th>22 Universities Participated</th></tr><tr><td>Products submitted</td><td>3</td><td>81</td></tr><tr><td>Total spend</td><td>Not identified</td><td>\$21.3M</td></tr><tr><td>Tier 1 supplier identified</td><td>3</td><td>66</td></tr><tr><td>Factories mapped</td><td>10 Factories 2 Mines</td><td>27 Factories</td></tr><tr><td>Countries represented</td><td>Hungary, Poland, Bolivia, China, Malaysia</td><td>Bolivia, China, Taiwan, India, Malaysia, Vietnam, Thailand, Hungary</td></tr><tr><td>Very high risk factories located</td><td>China, Malaysia</td><td>China, Taiwan, Malaysia, Thailand</td></tr><tr><td>Common risk themes</td><td>Deception about wages and benefits, Forced overtime, forced student labour, Restrictions of the right to resign Deception about toxic chemicals, Restriction of movement</td><td>Legal Wages, Occupational Health & Safety, Discrimination in hiring & occupation, Excessive working hours, Forced labour, Recruitment & employment conditions</td></tr><tr><td>Remediation underway</td><td>5 factories being monitored by EW</td><td>13 cases under remediation via EW (no university action required)</td></tr></table>	Metric	VU Result	22 Universities Participated	Products submitted	3	81	Total spend	Not identified	\$21.3M	Tier 1 supplier identified	3	66	Factories mapped	10 Factories 2 Mines	27 Factories	Countries represented	Hungary, Poland, Bolivia, China, Malaysia	Bolivia, China, Taiwan, India, Malaysia, Vietnam, Thailand, Hungary	Very high risk factories located	China, Malaysia	China, Taiwan, Malaysia, Thailand	Common risk themes	Deception about wages and benefits, Forced overtime, forced student labour, Restrictions of the right to resign Deception about toxic chemicals, Restriction of movement	Legal Wages, Occupational Health & Safety, Discrimination in hiring & occupation, Excessive working hours, Forced labour, Recruitment & employment conditions	Remediation underway	5 factories being monitored by EW	13 cases under remediation via EW (no university action required)
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3. Continuous improvement in spend data analysis

Planned Action:	Completed Action:
Implement a third-party spend analytics solution to enhance reporting accuracy and improve tracking of spend by category, supporting better risk identification and mitigation.	The action to implement a third party spend analytics solution to enhance reporting accuracy and improve tracking of spend by category was considered during 2025. This initiative was intended to strengthen data visibility across supplier spend and support more targeted identification and mitigation of modern slavery risks. During the reporting period, this initiative was placed on hold to prioritise the implementation of the Procure to Pay (P2P) enhancement project. The P2P project is a foundational system improvement designed to standardise procurement processes, improve data quality, and strengthen controls across the procurement lifecycle. Completion of this project is a necessary prerequisite to ensure that any future spend analytics solution is effective, accurate, and sustainable. Deferring the spend analytics solution reflects a deliberate sequencing of initiatives rather than a reduction in commitment to the action. The completion of the P2P enhancement project will provide a robust and future ready data environment, enabling more sophisticated and reliable spend analytics, improved category classification, and enhanced supplier risk profiling. Subject to successful completion of the P2P enhancement project, the implementation of a third party spend analytics solution will be planned as a formal action for 2027. This future implementation will support more advanced analysis of supplier spend patterns and further strengthen modern slavery risk identification, monitoring, and mitigation across the supply chain.

4. Training & awareness

Planned Action:	Completed Action:																												
- Continue delivering Modern Slavery Awareness Training for staff across all departments. - Integrate Modern Slavery Awareness Training into the 2025 University Career Conversations: Learning and Development Program. - Maintain ongoing training programs for: - Students - Manager Essentials [Finance for Managers] - Suppliers, with emphasis on onboarding new suppliers - Expand Modern Slavery Awareness Training to International Student Recruitment Agents.	VU continued to build internal and external capability to identify and address modern slavery risks through the delivery of Modern Slavery Awareness Training. During the reporting period, training was provided in-person or as synchronous webinars directly to a total of 147 participants, comprising: - Staff: 91 participants, including 30 staff who completed training as part of the Manager Essentials program, strengthening leadership capability in managing modern slavery risks - Students: 10 participants, supporting broader awareness and responsible practices within the VU community - Suppliers: 46 participants, reinforcing expectations regarding ethical labour practices and compliance within the supply chain. The suppliers were from 19 companies with the following industry classifications and Modern Slavery Risk Category: <table><tr><th>Industry Classification</th><th>Modern Slavery Risk</th></tr><tr><td>Translation & Accessibility Services</td><td>High</td></tr><tr><td>Construction Project Management</td><td>Low</td></tr><tr><td>Security Services</td><td>High</td></tr><tr><td>Architects</td><td>Low</td></tr><tr><td>Scientific Equipment</td><td>High</td></tr><tr><td>Equipment & Infrastructure Hire</td><td>High</td></tr><tr><td>Telecommunications Services</td><td>Low</td></tr><tr><td>Building Repair & Construction</td><td>High</td></tr><tr><td>Medical & Lab Consumables</td><td>High</td></tr><tr><td>Software Licences (Not SAAS)</td><td>High</td></tr><tr><td>Software as a Service</td><td>High</td></tr><tr><td>Photography</td><td>Low</td></tr><tr><td>Promotional Items & Merchandise</td><td>High</td></tr></table>	Industry Classification	Modern Slavery Risk	Translation & Accessibility Services	High	Construction Project Management	Low	Security Services	High	Architects	Low	Scientific Equipment	High	Equipment & Infrastructure Hire	High	Telecommunications Services	Low	Building Repair & Construction	High	Medical & Lab Consumables	High	Software Licences (Not SAAS)	High	Software as a Service	High	Photography	Low	Promotional Items & Merchandise	High
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Translation & Accessibility Services	High																												
Construction Project Management	Low																												
Security Services	High																												
Architects	Low																												
Scientific Equipment	High																												
Equipment & Infrastructure Hire	High																												
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Sector collaboration

Australasian University Procurement Network Modern Slavery Program

The Australasian Universities Procurement Network (AUPN) modern slavery program is a Higher Education sector-wide initiative involving 41 universities across Australia and New Zealand. The program leverages our collective spend and market influence as well as expertise to maximize purchasing power, drive ethical procurement, and ensure compliance with the *Modern Slavery Act 2018* (Cth).

2025 program pillars & initiatives

In 2025, the AUPN MS program operates under 5 program pillars.

1. Risk data

AUPN's Modern Slavery Program conducted sector-wide risk assessments to identify and prioritise supply chain categories with the highest potential impact. In 2025, member universities reviewed over 180,000 suppliers, representing a combined spend of \$14 billion, to map and monitor modern slavery risks across procurement activities. This data-driven approach enables targeted interventions and helps ensure compliance with the *Modern Slavery Act 2018* (Cth) and related regulations. Focus areas include medical equipment, ICT, and international student recruitment.

2. Capability uplift

The program invests in ongoing professional development and knowledge sharing to strengthen sector-wide capability in addressing modern slavery. In 2025, nine dedicated forums brought together expert speakers, survivor advocates, and procurement professionals to discuss topics such as ethical apparel procurement and risk identification tools. Regular newsletters, university case studies, and monthly updates facilitate continuous learning and improvement. The sector also benefits from national rollout of ACRATH's Educating for Change micro-credentials, developed in partnership with Flinders University and the University of South Australia. These six online modules, free for staff and students, cover an introduction to modern slavery, university-

specific risks, and practical sector guidance. As of the end of the 2025, they have been implemented by 32 Universities in Australia.

3. Supplier engagement

The AUPN's program of Supplier Assessment Questionnaires (SAQ) in laboratory and medical consumables category has revealed a broad spectrum of understanding of modern slavery. In 2025 further engagement was conducted with 5 suppliers who presented the greatest levels of risk in medical and laboratory consumables category.

Further to this, AUPN begun a detailed review into modern slavery risks in the medical gloves sector. This process builds on a review conducted in 2021 and will be finalised in 2026.

In the ICT category, 22 universities participated in an Electronics Watch pilot, monitoring 27 factories across seven countries. Common risks identified included legal wages, health and safety, discrimination, excessive hours, and forced labour. Remediation is underway in 13 cases, with two instances requiring direct university engagement to resolve outstanding issues.

4. Industry collaboration

The Modern Slavery Program is built on sector-wide collaboration. Through initiatives like the Temporary migrant survey which captured international student experiences, and the International Student Risk Roundtable, 2025 saw universities come together to share ideas and information with the goal of developing best practice guidance and responses.

In 2025, 18 universities contributed over 150 student responses to the temporary migrant survey, building an evidence base for future action. Key outcomes include a new project focussed on the development of sector-wide guidance, due to be completed in 2026, increased recognition of university responsibility, and identification of barriers. In 2025, the sector brought together 11 Universities for the International Student Risk Roundtable, bringing together university stakeholders and experts address risks which face students across their journey, from recruitment outside of Australia to their experiences on our campuses.

5. Third party support

External partnerships and third-party expertise underpin the program's efforts. The rollout of ACRATH's Educating for Change micro-credentials exemplifies effective collaboration with advocacy and training organisations. The sector also benefits from partnerships with global organisations such as Electronics Watch, which provides independent monitoring and remediation support in electronics supply chains. These collaborations ensure universities have access to credible resources, up-to-date training, and specialist support, enhancing their ability to prevent and address modern slavery risks.

The AUPN Modern Slavery Program has established a robust foundation for collective action, continuous improvement, and sector-wide capability uplift. Future priorities include expanding risk assessments, deepening supplier engagement, the development of guidance covering student protections, and exploring stronger analytics capabilities through third party systems.

For more information, please visit <https://www.hes.edu.au/university-anti-slavery-program>

International student risk

In 2024 VU participated in the National Temporary Migrant Survey provided by the Migrant Justice Institute. This survey was designed to capture international student's experiences of working in Australia including modern slavery indicators and related vulnerabilities.

The survey was provided to international students and 383 respondents nominated VU as their education provider. In May 2025 VU received a personalised report given the number of respondents.

The report provided to VU indicated that 122 respondents (34%) experienced one or more modern slavery indicators.

Very few respondents reported their experiences to anyone other than a friend, family co-worker or their employer. The survey results included The University was only contacted in 3 instances.

Data from this report was shared broadly across the Student Portfolio, covering both domestic and international students. The Modern Slavery Awareness Training was updated to include more specific information about identified risks to students. A tailored training session was provided to staff in the Student Equity Safety & Wellbeing team as they offer student support and counselling to students.

A sector wide report from the Migrant Justice Institute will be provided to all University Anti-Slavery Program members in early 2026. This will contribute to developing an evidence based, sector wide response throughout 2026.

Supplier engagement and risk review

Victoria University (VU) undertakes quarterly or semi-annual business review meetings with preferred suppliers that have been identified as either high spend or higher risk in relation to modern slavery. These engagements provide a structured forum to discuss supplier exposure to modern slavery risks, review existing controls, and identify opportunities to strengthen mitigation measures and continuous improvement initiatives.

In addition, VU recognises that a number of smaller suppliers may not be subject to mandatory reporting obligations under the *Modern Slavery Act 2018* (Cth). Where appropriate, the University supports these suppliers by sharing resources, guidance, and expectations relating to ethical sourcing and responsible labour practices. This approach is intended to encourage alignment with the University's ethical standards and to support suppliers in building capability to identify and manage modern slavery risks within their own operations and supply chains.

Proactive supplier collaboration – case studies

Victoria University maintains collaborative relationships with key suppliers to promote transparency, accountability, and responsible business practices throughout its supply chain. Recent examples of proactive and constructive supplier engagement include:

• Zinc Pty Ltd (Zinc Group)

As VU's provider of promotional products, Zinc has implemented a comprehensive vendor assessment framework. The promotional products industry involves diverse supply chains with varying risks, including modern slavery and ethical sourcing concerns. Zinc Group (Zinc) recognises that, despite not being a reporting entity under the Australian *Modern Slavery Act 2018*, they have a responsibility to promote transparency and work proactively with suppliers and clients to reduce these risks.

• Reed Events Pty Ltd

As the University's provider of graduation management services, Reed Events (Reed), remains strongly committed to ethical sourcing, transparent supply chain management, and the proactive identification and mitigation of modern slavery risks. As a supplier of academic dress and graduation products items that are globally recognised as high risk categories Reed considers it their responsibility to ensure robust oversight, due diligence, and continuous improvement across all tiers of their supply chain.

These examples demonstrate Victoria University's collaborative approach to supplier engagement, which supports increased visibility of supply chain practices and encourages continuous improvement. Through constructive dialogue and shared responsibility, VU seeks to strengthen ethical standards and reduce modern slavery risks across its operations and supply chains.



Zinc Group

Zinc's commitments

Zinc is committed to ethical sourcing and to minimising the potential for modern slavery across their operations.

Specifically, Zinc:

- 1 Will not knowingly use or contribute to modern slavery practices in any form.
- 2 Actively works to identify and eliminate modern slavery risks across their business, partnerships, and supply chains.
- 3 Rejects any form of exploitation, labour rights abuse, coercion, or punishment.
- 4 Recognises ethical processes as essential to value, quality, and "fit for purpose" considerations.
- 5 Supports clients in making purchasing decisions that consider more than cost alone.

Supplier engagement and risk review (cont.)

How zinc manages modern slavery risk

Zinc's approach aligns with industry wide best practice and focuses on:

- 1 Strong supplier relationships
 - ◆ Clear communication of expectations.
 - ◆ Increasing awareness through engagement, discussion, and training.
 - ◆ Sharing information on actions taken to address modern slavery risks when required.
- 2 Reviewing their own operations to understand how purchasing practices may influence supplier behaviour.
- 3 Conducting appropriate due diligence to better identify, assess, and mitigate potential risks.
- 4 Working with industry associations to strengthen capability and promote responsible supply chains.
- 5 Using their collective influence to encourage broader industry progress toward ethical, slavery free sourcing.

Supplier assurance & auditing

Zinc requires all offshore supply partners to meet recognised international social accountability standards.

This includes:

- ◆ A current, valid social accountability audit (e.g., SMETA, BSCI), updated annually.
- ◆ Monitoring through Zinc's Audited Supply Partner Directory, which alerts Zinc 30 days before audit expiry.
- ◆ Regular factory visits by Zinc's leadership team members and Zinc's China based audit team to ensure compliance.
- ◆ Meeting The Walt Disney Company Supply Chain Code of Conduct and maintaining a valid FAMA (Facility and Merchandise Authorisation) for authorised production.

Zinc's physical presence in China and Hong Kong enables direct sourcing from manufacturers, reducing reliance on intermediaries and supporting supply chain transparency.



Reed Events

Activities and continued due diligence

1. Review and re-confirmation of supplier compliance

Over the past year, Reed Graduation Services undertook a renewed review of their active suppliers, two offshore garment manufacturing and five local Australian suppliers to confirm continued adherence to their Modern Slavery Risk Management Framework. This included:

- ◆ Requesting updated statements of compliance and declarations of non-involvement with forced labour practices
- ◆ Reviewing supplier policies related to worker rights, recruitment practices, subcontracting, and raw material procurement
- ◆ Conducting supplier interviews and desktop assessments to verify that previously implemented corrective actions remain active

This process has reaffirmed that their suppliers maintain practices consistent with Reeds ethical sourcing expectations.

2. Traceability and supply-chain mapping enhancements

Recognising that the highest modern slavery risks often exist beyond Tier 1 suppliers, Reed expanded efforts to understand the deeper supply chain, particularly for textiles, frames, and packaging materials. Recent reviews included:

- ◆ Mapping six Tier 2 suppliers associated with fabric production, trimming, and embroidery
- ◆ Requesting additional documentation relating to cotton and polyester yarn sourcing
- ◆ Seeking confirmations from suppliers regarding the absence of sourcing from high risk regions identified by the Global Slavery Index

Reed's suppliers have provided updated declarations and documentation to support these verifications.

3. Local supplier risk assessments

Building on the audit conducted with Reeds onshore certificate frame supplier in 2025, Reeds expanded localised due diligence to include:

- ◆ A Modern Slavery Risk Assessment Questionnaire completed by five key Australian suppliers
- ◆ A review of material origins, with a focus on glass, wood, packaging and print materials
- ◆ Verification that suppliers maintain appropriate internal controls for labour hire, subcontracting, and working conditions oversight

These assessments confirmed that local suppliers maintain low risk profiles and demonstrate willingness to improve transparency in Reed's supply chains.

Upcoming 2026 Supplier Audits

A comprehensive program of offshore supplier audits is scheduled for 2026, led by Reed's Managing Director. These audits reflect Reed's commitment to strengthening visibility and accountability across all areas of their supply chain, including both physical product manufacturing and technology service delivery.

4. Garment manufacturing suppliers

In 2026, Reed's Managing Director will conduct a dedicated visit to one key offshore garment manufacturing partner. This audit will include:

- ◆ Factory site inspections focused on working conditions, production processes, and workforce practices
- ◆ Worker interviews, where appropriate, to obtain direct insight into labour conditions
- ◆ Assessment of labour hire and recruitment practices, including checks for subcontracting
- ◆ Expanded documentation reviews covering Tier 2 and Tier 3 fabric, yarn, and accessory suppliers
- ◆ Verification of previously identified corrective actions and confirmation of ongoing compliance

5. Web services partner

Separately, Reed has planned an additional offshore visit in 2026 to audit their Web Services partner, who supports Reed's technology platforms and online ordering systems. This visit will be conducted jointly by:

- ◆ the Reed Managing Director, and
- ◆ Senior Australian-based management from the Web Services partner

This audit will focus on:

- ◆ Reviewing workplace standards and staffing arrangements
- ◆ Evaluating governance, data-handling controls, and labour hire practices
- ◆ Confirming alignment with Reed's Modern Slavery policy expectations
- ◆ Strengthening transparency and oversight within their digital services supply chain

Continuous improvement and policy development

During the past year, Reed Graduation Services has further embedded modern slavery considerations into their procurement and operational processes by:

- ◆ Updating their Supplier Code of Conduct to strengthen standards relating to forced labour, recruitment practices, and worker welfare
- ◆ Training internal staff involved in supplier selection and purchasing, to ensure they can identify red flags and escalate risks appropriately
- ◆ Implementing a more structured annual review cycle for supply chain risk

These improvements reflect Reed's long term commitment to responsible sourcing and to supporting the broader efforts of partners such as Victoria University to address modern slavery risks.

Case study: indirect modern slavery risk – laboratory gloves supply chain (2025)

In 2025, VU purchased 89,616 laboratory gloves (including nitrile, latex and non-latex variants) through its own online procurement catalogue. The catalogue operates as an aggregator platform, enabling purchasing from approved laboratory and chemical suppliers.

The manufacture of laboratory consumables and PPE is recognised as a higher-risk category for modern slavery, due to complex global supply chains.

In early 2026, a PPE manufacturer notified customers of serious labour rights allegations involving a small upstream supplier that provided PPE mouldings to one of its manufacturing facilities in Southeast Asia. This supplier is not a direct supplier to VU and did not have a contractual relationship with VU, but formed part of the extended supply chain for specific PPE products. In 2025 VU purchased approximately 10,000 gloves from this PPE manufacturer.

The PPE manufacturer advised that it became aware of the allegations in 2025 and undertook a range of remediation and response actions. Following the allegations, the upstream supplier terminated workers and commenced repatriation processes. As a result, the PPE manufacturer suspended its relationship with the supplier later in 2025. The upstream supplier subsequently entered liquidation. The PPE manufacturer has publicly stated that it continues to support affected workers in collaboration with relevant industry partners.

VU assessed this matter as an indirect, lower-tier supply chain risk, with no evidence of modern slavery identified within VU's direct supplier relationships. Nevertheless, the case highlights the inherent risks present in complex global supply chains and the importance of conducting due diligence beyond first tier suppliers.

VU will continue to manage modern slavery risks in this category by procuring through established suppliers, monitoring supplier disclosures and industry developments, and incorporating learnings from identified incidents into ongoing procurement and risk management practices.

Responsible investments

Investment portfolio risk

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

As at 31 December 2025, one hundred per cent of the equity component of our funds are invested in two responsible investment products:

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

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

As at 31 December 2025:

- ◆ The RARI portfolio exhibited carbon intensity of 72.5 tonnes CO₂ per
- ◆ \$1m revenue (USD) compared to the benchmark's 167 tonnes.

The Global Shares ex Fossil Fuels portfolio exhibited carbon intensity of 42 tonnes CO₂ per \$1m revenue (USD) compared to the benchmark's 110.7 tonnes.

The index which the ETF tracks is weighted to companies that exhibit positive ESG characteristics. This is determined using Russell Investments' proprietary Material ESG Scores, which are based on issues financially material to a company's business.

These issues are identified using the industry-level materiality map developed by the Sustainability Accounting Standards Board (SASB), relevant to each company.

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

The consultant uses information from a variety of sources, including third party data providers, as well as data gathered as part of their investment and operational due diligence processes to help understand the risks of Modern Slavery within their investment funds. Modern Slavery risks variables (such as indicators for human rights, human capital and human supply chain risks) are available for securities within each Australia Fund that the consultant manages. These variables help them to understand the potential for exposure to Modern Slavery in the equity portfolios, and they are regularly reviewed as part of their Enhanced Oversight Process, which requires the portfolio managers to assess ESG risks in their funds as part of their quarterly fund review process.

Russell Investments have been a signatory of the United Nations-supported Principles for Responsible Investment (PRI) since 2009. Their 2025 PRI Transparency Report can be found on their website.

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

It is an investor-led, multi-stakeholder project that was established to engage with companies in the region to promote effective action in finding, fixing and preventing modern slavery in operations and supply chains. IAST APAC currently comprises 50 investor members with AU\$12 trillion in Assets Under Management (AUM).

Planned actions

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

Planned action 1: improving international student awareness of modern slavery risks

Enhance awareness of modern slavery risks among international students by embedding targeted education at the pre departure stage of the student journey prior to commencement of studies at VU. This action will focus on early intervention and prevention by providing clear, accessible information before students arrive in Australia.

Educational video resources will be developed to inform students of their workplace rights, relevant Australian employment laws, and common indicators of exploitation. The materials will also clearly outline available support pathways, including who students can contact if they suspect their rights are being breached while studying or working.

This initiative aims to empower international students to identify potential modern slavery risks, seek support early, and make informed decisions, thereby reducing vulnerability to exploitation and strengthening institutional prevention and safeguarding measures.

Planned action 2: student placements information awareness

Develop content for student placement inductions that translate the key messages from existing VU Modern Slavery Awareness Training into a student facing, and placement specific context.

Planned action 3: enterprise risk assessment

This action will establish a consistent and documented approach to identifying, assessing, and managing modern slavery risks, providing an ongoing stream of assurance to senior leadership and supporting timely, informed decision making. The documented risk assessment will strengthen governance oversight and embed modern slavery considerations within enterprise and departmental risk management frameworks.

Planned action 4: training & awareness

- ◆ Continue delivering Modern Slavery Awareness Training for staff across all departments.
- ◆ Maintain ongoing training programs for:
 - ◆ Students
 - ◆ Manager Essentials [Finance for Managers]
 - ◆ Suppliers, with emphasis on onboarding new suppliers

Planned action 5: electronics watch pilot program

Continuing with the Electronics Watch pilot program, promoting worker-driven, independent monitoring of modern slavery risks in ICT supply chains. The service will be used to assess new technology suppliers that will be procured from in 2026.

Effectiveness of actions

Victoria University (VU) considers that the actions taken to date to identify, assess, and manage modern slavery risks demonstrate a strong commitment to the prevention of modern slavery across its operations and supply chains. Based on the risk assessment activities undertaken during the reporting period, VU did not identify any instances or specific risks of modern slavery within its operations or direct supply chain.

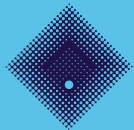
While no direct modern slavery risks were identified, the University acknowledges that modern slavery is a complex and evolving issue and that risks may not always be readily visible. Accordingly, VU recognises the importance of maintaining ongoing vigilance and continuous improvement. Further actions, as outlined in this statement, will support the continued strengthening

of controls, awareness, and oversight to minimise the risk of exploitation within the University's operations and supply chains over time.

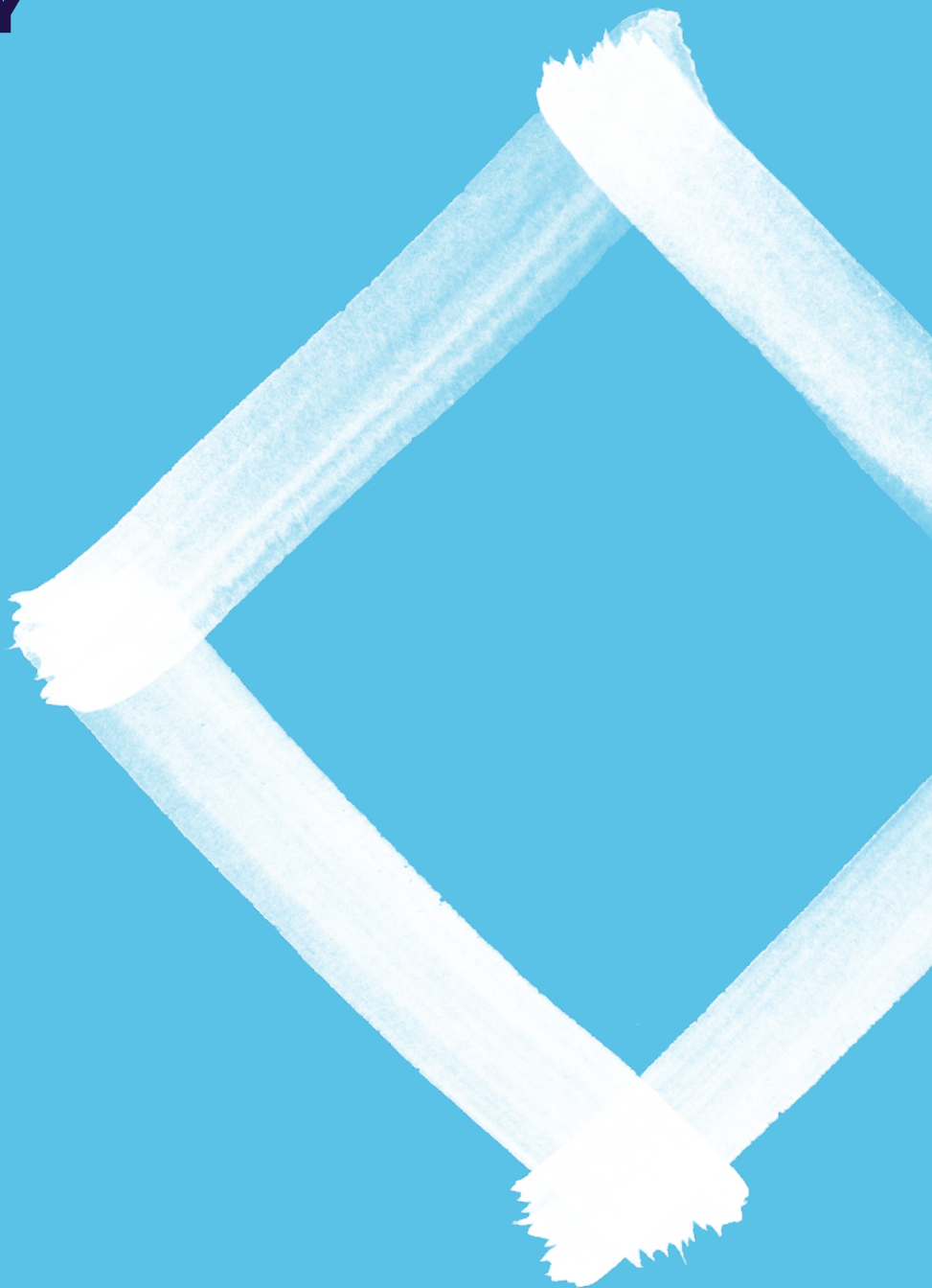
This Modern Slavery Statement is made by Victoria University in accordance with the *Modern Slavery Act 2018* (Cth). The statement has been approved by the Victoria University Council and is signed by Professor Adam Shoemaker, Vice-Chancellor.

A handwritten signature in black ink, reading 'Adam Shoemaker', with a stylized flourish at the end.

Professor Adam Shoemaker,
Vice-Chancellor of Victoria University



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