



Federation University Australia

Modern Slavery Statement

Reporting period: 1 January 2025 to 31 December 2025

Prepared in accordance with: *Modern Slavery Act 2018 (Cth)*

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Federation University Australia – Modern Slavery Statement

Introduction

This Modern Slavery Statement (Statement) is made by Federation University Australia (the University) pursuant to section 16 of the *Modern Slavery Act 2018 (Cth)* (the Act). It describes the steps taken during the reporting period to identify, assess and address the risks of modern slavery in the University's operations and supply chains.

This Statement builds on and is informed by the University's previous Modern Slavery Statements for the 2022–2024 reporting periods and reflects a continued and maturing focus on governance, procurement oversight, supplier engagement and staff capability. The Statement covers the University and the entities it owns or controls, as set out below.

Part A: The Reporting Entities

Federation University Australia

Federation University Australia is a public Australian university operating across the higher education and vocational education and training (TAFE) sectors. The University operates campuses in Victoria and undertakes teaching, research and engagement activities domestically and internationally through onshore operations, partnerships and collaborations.

Employability.Life

Employability.Life (Employability.Life) is a wholly owned controlled entity of the University. Its activities are focused on employability-related services, digital platforms, partnerships and programs designed to improve graduate employment outcomes and workforce capability. Employability.Life operates primarily in India and engages a range of professional, digital, consultancy and technology service providers.

Federation Education Services Ltd (FES)

Federation Education Services Ltd (FES) is a controlled entity of the University and manages teaching and learning, commercial, accommodation, facilities, hospitality and campus-related services. FES activities involve higher-volume operational procurement and contracted service delivery, including cleaning, maintenance, security, facilities management and retail-adjacent services.

This Statement is made as a **joint statement** covering Federation University Australia, Employability.Life and Federation Education Services Ltd. Consultation has occurred across the University and these controlled entities as part of the preparation of this Statement.

Governance Alignment for Controlled Entities

The University maintains governance arrangements to support alignment of modern slavery risk management across its controlled entities. This includes oversight of procurement, legal and risk frameworks, alignment of procurement policies and standard contract templates, and access by Employability.Life and FES to central legal, procurement and compliance expertise. Controlled entities are required to manage procurement and supplier relationships consistently with the University's modern slavery expectations, while applying additional operational controls where appropriate to the nature and scale of their activities. Regular engagement

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between the University and its controlled entities supports shared awareness of risks, escalation of issues and continuous improvement across the group.

Part B: Operations and Supply Chains

Operations

Across the reporting entities, core operational activities include:

- delivery of higher education and TAFE programs;
- research, research commercialisation and industry engagement;
- international education, student recruitment and offshore collaboration;
- student support, accommodation, hospitality and ancillary services;
- employability platforms, partnerships and capability programs; and
- corporate, professional and facilities services supporting these activities.

Operations are primarily undertaken in Australia, with offshore activity largely limited to international education and recruitment, research collaboration, technology-enabled services and the upstream manufacture of goods.

Supply Chains – Overview

The University and its controlled entities procure goods and services through a decentralised operating model supported by a centralised procurement framework. Supply chains include both direct suppliers (tier one) and extended upstream suppliers (lower tiers), with the latter generally presenting greater inherent modern slavery risk due to reduced visibility and control.

The principal categories of goods and services procured across the group include:

- **Information and communications technology (ICT):** hardware, peripherals, software licensing, cloud services and systems integration;
- **Construction and capital works:** building works, refurbishments, fit-outs and associated professional services;
- **Facilities management and outsourced services:** cleaning, security, maintenance, waste management and grounds services;
- **Labour-hire and contracting:** short-term labour, specialist contractors and technical services;
- **Professional services:** legal, audit, consulting, marketing, digital and advisory services;
- **Education-related goods and services:** teaching materials, laboratory equipment, uniforms and consumables;
- **Accommodation and hospitality supply chains:** food services, linen, consumables and retail-adjacent goods; and
- **International supply chains:** manufacturing of ICT equipment, uniforms and consumables, and overseas education, recruitment and service providers.

Procurement is undertaken using a combination of University-managed contracts, preferred supplier arrangements and sector-wide agreements, particularly through the Australian Universities Procurement Network (AUPN).

Part C: Risks of Modern Slavery Practices

The University recognises that modern slavery risks are most likely to arise:

- in labour-intensive industries;
- where there is extensive subcontracting or use of labour-hire;
- in lower tiers of supply chains where visibility is limited; and
- in regions with weaker labour protections or regulatory oversight.

Based on risk assessments undertaken during the reporting period, the following areas were identified as presenting heightened inherent risk across the group:

- outsourced cleaning, security and facilities services, involving vulnerable or low-paid workforces;
- labour-hire and short-term contracting arrangements;
- construction and capital works involving multilayer subcontracting;
- manufacture of ICT hardware, uniforms and consumables sourced offshore;
- accommodation, hospitality and campus services supply chains managed by FES; and
- international recruitment, partnerships and service providers.

These risk areas are consistent with those identified in previous reporting periods. No material new high-risk categories were identified during the 2025 reporting period.

Part D: Actions Taken to Assess and Address Risks

Drawing on approaches reflected in modern slavery statements published by a range of Australian universities, the University continues to align its framework with emerging sector good practice. Common elements observed across the higher education sector include a strong emphasis on risk-based procurement, centralised legal and procurement oversight, supplier engagement beyond tier one, and collaboration through AUPN and similar forums. These elements inform the University's approach, while being adapted to the scale, complexity and risk profile of its operations.

Procurement Framework

The University maintains a documented procurement framework that applies across the University and, where relevant, its controlled entities. Key features of the framework relevant to modern slavery risk management include:

- a risk-based procurement approach proportionate to spend, category and supplier risk;
- mandatory use of approved procurement templates and contract terms for higher-risk procurements;
- integration of modern slavery considerations into procurement planning and supplier selection; and
- access to central procurement expertise for complex or high-risk engagements.

FES aligns its procurement practices with the University framework while maintaining additional operational controls appropriate to its higher exposure service categories.

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Legal and Contractual Controls

Modern slavery risk is addressed through standard legal and commercial templates, including:

- modern slavery representations, warranties and compliance obligations in supplier contracts;
- requirements for suppliers to comply with applicable labour laws and not engage in modern slavery practices;
- rights for the University or FES to request information, conduct reviews or take remedial action where risks are identified; and
- termination rights for serious or unremediated breaches.

These clauses are embedded in standard form contracts and procurement templates and are reviewed periodically to maintain alignment with legislative requirements and sector practice.

Supplier Due Diligence and Engagement

During the reporting period, the University and its controlled entities:

- continued to use AUPN and sector-led supply chain risk assessment tools;
- undertook enhanced due diligence for higher-risk procurement categories;
- engaged with suppliers to seek confirmation of compliance with modern slavery obligations; and
- applied escalation pathways where risks or concerns were identified.

Training and Awareness

Actions undertaken during the reporting period included:

- development of internal guidance materials to support identification and escalation of risks; and
- preparation for broader embedding of modern slavery content into online compliance training.

Part E: Assessment of Effectiveness

The effectiveness of the actions described above is assessed through:

- review of procurement activity and contract compliance;
- monitoring supplier engagement and responses;
- internal feedback from operational areas; and
- continuous improvement informed by sector guidance and peer benchmarking.

Consistent with emerging practice across the higher education sector, the University adopts a continuous improvement approach to modern slavery risk management. This recognises that visibility into supply chains, particularly beyond tier one suppliers, develops over time and requires ongoing refinement of controls, processes and engagement strategies. The University uses each reporting cycle to reflect on lessons learned, identify areas for enhancement and progressively strengthen its framework, rather than treating compliance as a static or one-off exercise.

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The University acknowledges that measuring effectiveness in this area is complex and iterative. Continuous refinement of controls and processes remains a focus.

Part F: Consultation

Consultation in preparing this Statement occurred across relevant areas of Federation University Australia, EmployabilityLife Pty Ltd and Federation Enterprises Pty Ltd, including procurement, finance, facilities, governance and legal functions. This consultation supports a consistent, group-wide approach to managing modern slavery risks.

Part G: Other Relevant Information

The University and its controlled entities continue to participate in sector-wide collaboration, particularly through AUPN, to improve collective understanding of supply chain risks and to adopt leading practice approaches appropriate to the higher education sector.

Part H: Looking Ahead

In the next reporting period, the University intends to:

- further embed modern slavery considerations into procurement and contract management practices across the group;
 - strengthen supplier due diligence for higher-risk categories;
 - expand staff training and awareness initiatives; and
 - continue refining governance, reporting and escalation mechanisms.
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Approval

This Statement was approved by the governing body of Federation University Australia in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)*.

Signed:



Vice-Chancellor and President
Federation University Australia

Date: 6 May 2026