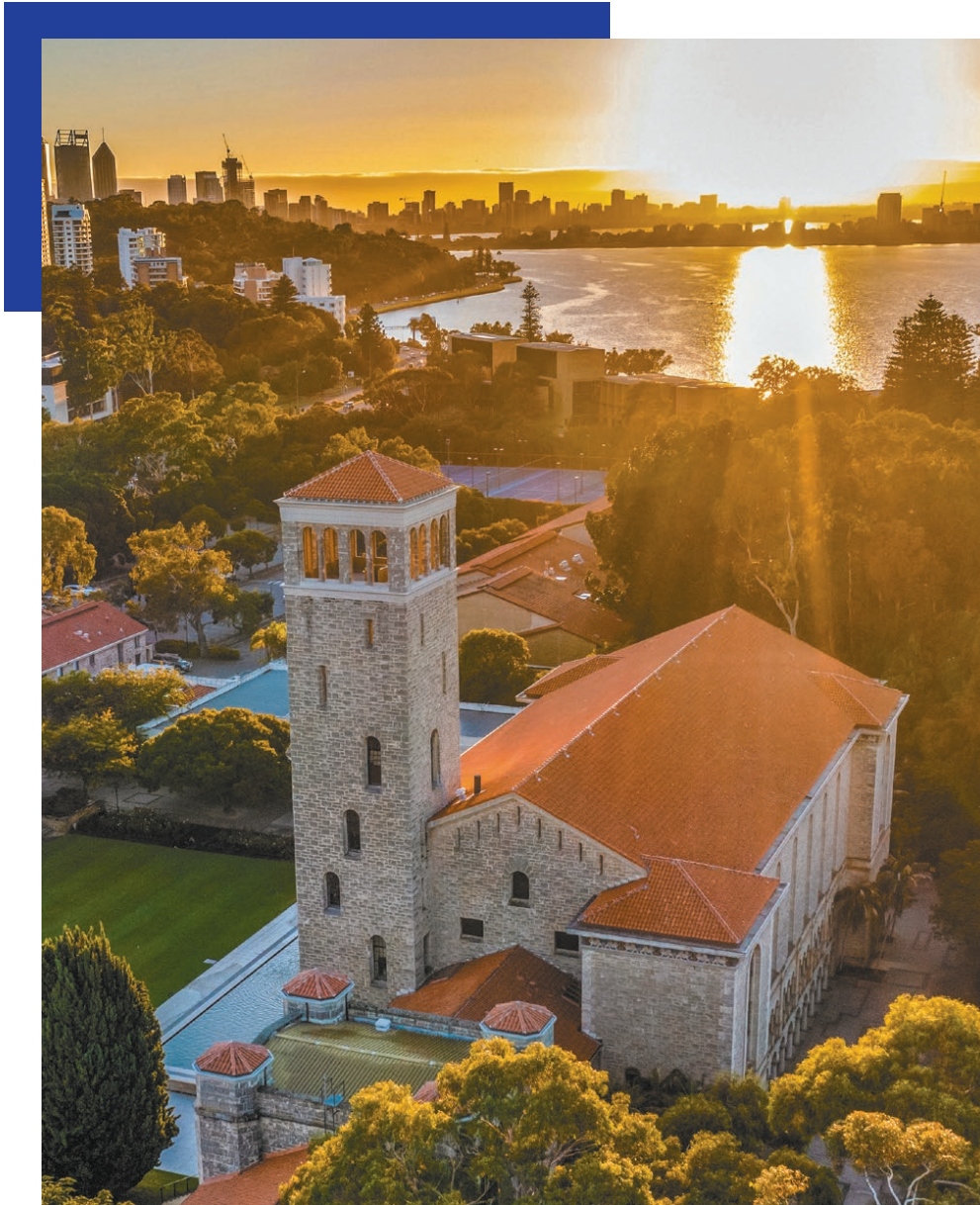




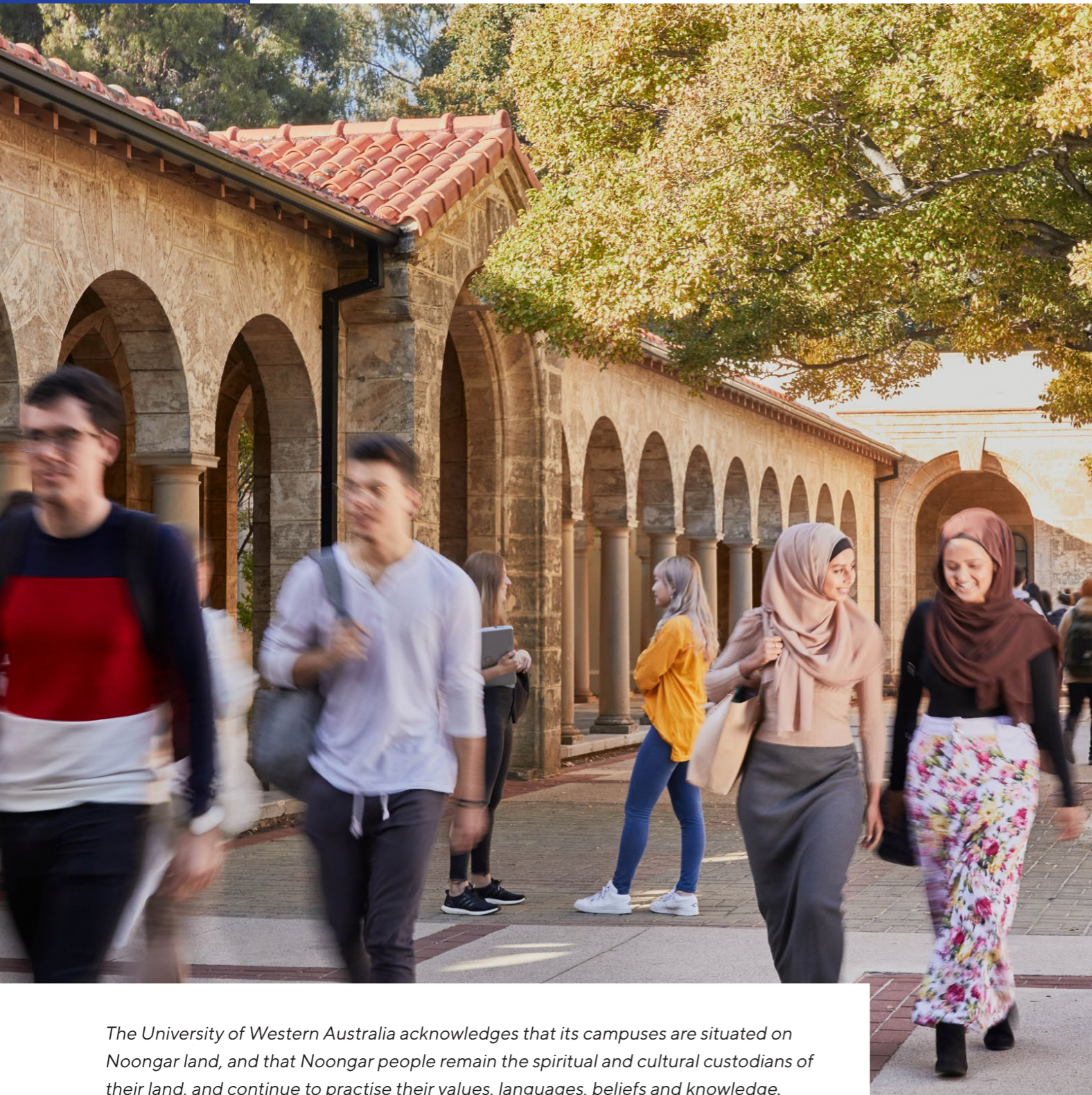
THE UNIVERSITY OF
**WESTERN
AUSTRALIA**



UWA Modern Slavery Statement 2022

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The University of Western Australia acknowledges that its campuses are situated on Noongar land, and that Noongar people remain the spiritual and cultural custodians of their land, and continue to practise their values, languages, beliefs and knowledge.





Opening Statement from the Vice-Chancellor

The *Commonwealth Modern Slavery Act 2018* (Cth) (the **Act**) established Australia's national modern slavery reporting requirement. Under the reporting requirement, certain large entities must publish annual Modern Slavery Statements describing their actions to assess and address modern slavery risks. The University of Western Australia (UWA) is a reporting entity under the requirements of the Act and we recognise our responsibility to address all forms of modern slavery associated with our operations and supply chains.

This Statement is the University's third Modern Slavery Statement, covering the period from January to December 2022 and encompassing The University of Western Australia and its subsidiaries.

This Statement has been prepared in consultation with the offices of each Executive portfolio and approved by the University's governing body, the Senate.

The University acknowledged the risk of modern slavery occurring in our operations and supply chains and is committed to continuously monitor, investigate and address these risks.

I thank and acknowledge the ongoing efforts of all staff and students in recognising modern slavery risks and taking appropriate steps to address them.

Professor Amit Chakma
Vice-Chancellor

Executive Summary

The University of Western Australia (UWA) is committed to its responsibility to employees, students, suppliers and community to ensure that modern slavery risks are identified and addressed within our operations and supply chains. This Statement reflects that commitment and reports on the steps undertaken to assess and address the risks of modern slavery within our operations and supply chain for the period 1 January 2022 to 31 December 2022.

We have undertaken assessment of our policies and practices through consultation and inquiry across UWA, as well as analysis of our supply chain. While the risk of modern slavery within our operations and supply chains is deemed to be low, we will continue efforts to enhance and improve on our policies, practices and culture on modern slavery across UWA.

APPROACH TO REVIEW AND DEVELOPMENT OF OUR STATEMENT

The UWA Modern Slavery Working Group, comprising representatives across key operational areas, was established to lead the planning and implementation of programs and processes to identify and address the risk of modern slavery. The Working Group operates under the direction of the Office of the Chief Financial Officer within the Executive group.

In developing this Statement, UWA recognises that various facets of our operations may be subject to risk of modern slavery and accordingly, has engaged with our operational areas to identify current mitigations in place and future actions to address those risks. These facets of our operations include current and future students, staff, investments, supply chain, and subsidiaries.

This Statement recognises areas of risk within our supply chain which have been assessed through targeted analysis encompassing geographical location and spend analytics of high-risk supply categories, such as Facilities Management (incorporating construction), Information and Communication Technologies and Equipment and Consumables. The Statement has benefitted from our collaboration with the Australian Universities Procurement Network (AUPN) and the UWA Modern Slavery Research Cluster.

Through this engagement, collaboration and analysis, UWA has assessed that our overall modern slavery risk rating remained low in 2022. We do, however, acknowledge the work yet to be done to fully interrogate and mitigate these risks and to remediate any occurrences of modern slavery should they be identified.

DEFINITION OF MODERN SLAVERY

Modern Slavery is defined by the Department of Home Affairs as situations where coercion, threats, or deception are used to exploit victims and undermine or deprive them of their freedom.

OUR RISK PROFILE AND ASSESSMENT

UWA acknowledges a risk-based approach in identifying areas where the risk of Modern Slavery may present both directly and indirectly in our operations, including through our supply chains and work undertaken by our students within the broader community.

Through consultation, analysis and inquiry, UWA deems the overall risk of modern slavery within our operations and across our supply chains to be low.

Our supply chain carries risk of modern slavery due to the size and diversity of our purchasing networks, encompassing a large number of supply categories, serviced by both local and overseas suppliers, with a significant degree of sub-contracting prevalent in certain categories of expenditure. Modern slavery can occur in all tiers of the supply chain from material extraction to service delivery.

In 2022 over 99.5 percent of UWA's spend was purchased from suppliers in low-risk geographic locations. A small spend on equipment and consumables, and professional services with vendors in China and India was identified for further investigation. High-risk expenditure categories were identified in construction, electronic services and consumables, PC desktops and notebooks, and cleaning and waste and security. In 2022, purchases from suppliers specifically identified as high-risk accounted for less than 2% of total expenditure.

The risk of modern slavery to our employees is deemed to be low, with most employees governed by one of our Enterprise Agreements which are approved by the Fair Work Commission. Regulatory and legislative frameworks within Australia are supportive in minimising the risk of direct forms of

modern slavery in employment practices, such as servitude, debt bondage and deceptive recruitment practices. However, it is acknowledged that the use of sub-contractors and the employment of individuals outside of Australia may indirectly increase the risk of modern slavery in this area.

Student employment and co-curricular activities are governed by the Fair Work Act (in Australia) and covered by UWA policies and procedures. Indirect risk may exist where our students are employed by other organisations. Students may be vulnerable to being exploited in their workplaces, particularly those with limited support networks, low English language proficiency, or limited knowledge of workplace laws in Australia.



OUR ACTIONS & MITIGATIONS

UWA continues to work collaboratively through its Modern Slavery Working Group and in consultation with the sector to identify and enact improvement opportunities to our current procurement processes and practices. The use of a modern slavery supply chain platform enables the pro-active monitoring of suppliers and expenditure levels in high-risk locations and categories. This information is used to support risk identification and mitigation strategies in our strategic procurement activities.

UWA provides students with resources, support services and communications about the risks relevant to the workplace. Before offering employment and experiential learning opportunities, UWA performs preliminary checks on employers

and host organisations to ensure compliance under the *Fair Work Act*. Appraisal policies for third party and overseas providers are being developed. UWA is continuing to improve procedures, and policies to ensure the risk remains low.

UWA has a suite of policies, procedures and practices in place which assist in managing human rights, promoting diversity and ensuring compliance with relevant legislation, including the *Fair Work Act*, which collectively serve to minimise the risk of our employees being subject to modern slavery. UWA has an internal and external audit regime that examines compliance with these policies.

2022 HIGHLIGHTS



Figure 1. UWA modern slavery highlights 2022

Our University Structure, Operations and Supply Chains

ABOUT UWA

Established in 1911 as Western Australia's first university, The University of Western Australia (UWA) was also the first free university in the British Empire. As one of Australia's leading research-intensive universities UWA operates more than 40 intensive research centres and 22 schools, offering students tertiary degrees in 12 areas of study, in addition to having a broad range of successful industry partnerships. In 2022, UWA educated more than 25,000 students from across 100 countries. UWA is a member of the internationally recognised Australian Group of Eight universities and a foundation member of the Matariki Network of high-quality, research-intensive universities with a particular focus on student experience.

OUR GOVERNANCE

Senate

The University of Western Australia Act 1911 (WA) gives the Senate powers to act in the interests of UWA through the making of statutes, regulations, and by-laws and through the management of income and expenditure. It provides powers of delegation for the Senate, so that day-to-day management can be delegated to officers employed by UWA. UWA is responsible to the State Minister for Education for the proper conduct of its business under the State legislation, and to the Commonwealth Minister for Education for the delivery of our teaching and research programs, and for the provision of adequate infrastructure to support those programs.

Executive

The Senate appoints the Vice-Chancellor and works in partnership with the incumbent in this role to maximise UWA's capacity and performance, and to ensure our fiscal viability. The Vice-Chancellor

is delegated operational responsibility of UWA. The Vice-Chancellor appoints an executive group to assist with responsibilities for the academic, financial, administrative and other business of UWA.

OUR OPERATIONS

As a higher education institution, UWA's core activities of teaching, research and community engagement are highly dependent on the calibre and integrity of its people. UWA has a responsibility to ensure that its workforce and student body are provided with safeguards and mechanisms to mitigate modern slavery risks.

Education

Responsibility for the quality and delivery of education at UWA primarily lies with our schools. They design and deliver courses and units and are accountable for quality of teaching and student satisfaction with their educational experience. The Deputy Vice-Chancellor (Education) leads UWA's academic programs and education mission.

Research and Innovation

Responsibility for the quality and delivery of research at UWA lies with our schools, institutes and centres. They foster collaborative and multidisciplinary research teams that resolve real world challenges that are critical to the planet and its people. The Deputy Vice-Chancellor (Research) leads UWA's research mission and programs.

Partnerships

UWA is passionate about its partnerships and creating positive change for the wider community. It embodies this through support for a wide range of initiatives in key development areas of art, culture, sport, education and philanthropy.

OUR SUPPLY CHAIN

Our procurement activities apply to the acquisition of goods and services, whether purchased or leased, for all business units, across all sources of funding. These activities are guided by our procurement principles of probity, fair competition, value for money, sustainable procurement and risk managed procurement. Procurement activities are informed by the Finance Policy and the Procurement Financial Control Document. Purchases that are assessed to be high-risk undergo a formal tender process irrespective of the total dollar value of the resulting contract.

UWA non-employee related annual spend for 2022 was \$342 million, through active contracts, purchase orders or credit card expenditure ranging from one-off research equipment purchases to large value, multi-year contracts. UWA classifies its external spend across six key category areas to support the varied business needs of its College of Schools as well as the operational business units.

UWA is committed to transparency across our processes and policies, to drive up standards and highlight issues across our supply chain. UWA recognises the need for continuous improvement in the identification of risks beyond Tier 1 suppliers, the influence exerted in the actions we take to remediate, and the development of our people and culture to further understand and address modern slavery in our procurement and operations.

UWA's engagement with the Australian University Procurement Network (AUPN) and the initiatives developed by the AUPN Modern Slavery Working Group serve to inform UWA's approach to dealing with modern slavery independently, but also from an industry platform, leveraging the collective procurement spend of approximately \$16 billion annually across 38 participating universities.



Figure 2: UWA Procurement categories

Risks of Modern Slavery Practices in Our Operations and Supply Chains

Utilising the data and information available from our supply chain and through our wider consultation processes with our directorates, schools and subsidiaries, UWA would assess our risk of modern slavery in our operations and supply chain at this time to be low.

OUR STUDENTS

In 2022, 27,112 students were enrolled at UWA, with an equivalent full-time student load of 19,560.

UWA implements a range of policies and procedures upholding the rights and freedoms of all our students in line with national legislation and international commitments. The [University Charter of student rights and responsibilities](#) sets out the fundamental rights and responsibilities of students and their organisations at UWA.

Within the Office of the Deputy Vice-Chancellor (Education), Student Life encompasses services to students across student administration functions from enrolment through to graduation. Health and well-being services, social and academic support and the provision of participation opportunities through dedicated student equity programs are also available.

University Hall provides a comprehensive on-campus residential student experience. Additional off-campus accommodation services, childcare services, sport and recreation programs, activities and clubs are provided through affiliate relationships also reporting into the Student Life portfolio.

Workplace Risk

Student classroom and co-curricular learning is supported via experiential learning opportunities facilitated by UWA through:

- paid and unpaid placements/internships - undertaken for both credit and not-for-credit

- overseas placements with host organisations
- placements undertaken via third party providers
- industry mentoring programs
- industry projects.

Employment opportunities are advertised through a jobs board exclusively for UWA students. Students apply for these opportunities directly with the employer.

UWA deems the workplace risk to be low due to procedures and policies in place to safeguard exploitation.

OUR EMPLOYEES

In 2022, UWA's full-time employee equivalent was 3,150 employed.

UWA's terms and conditions of employment are set out in employment contracts and Enterprise Agreements. These industrial instruments meet all relevant legislative and common law obligations and are provided to all employees when they are engaged by UWA. At a minimum, the engagement of employees at UWA complies with the *Fair Work Act 2009* (Cth) and any other relevant legislation.

The majority of UWA employees' employment is governed by one of our Enterprise Agreements. These Enterprise Agreements provide the minimum terms and conditions of employment, for the individuals covered by them. Each of the Enterprise Agreements are approved by the Fair Work Commission.

Senior employees have individual employment contracts which are drafted in compliance with current legislation.

UWA has a suite of policies, procedures and practices in place which assist in managing human rights, promoting diversity and ensuring compliance with relevant legislation.

UWA has a comprehensive people-focused policy suite that provides protection for:

- prospective staff (during recruitment and selection); and
- staff during their employment.

These policies are designed to ensure a safe working environment, protection from mistreatment at work and aim to provide a workplace free of intimidation, threats, actual or threatened physical and/or sexual violence, forced labour and abusive working conditions. Policies are available to staff through UWA's Policy Library. Failure to comply with UWA policies may result in disciplinary action. There are also a range of mechanisms in place for staff to make enquiries or complaints regarding their employment, without fear of prejudice or adverse consequence.

UWA has an internal and external audit regime that examines compliance with employee entitlements. Audit findings and recommendations are reported and monitored via the University's governance systems.

UWA has a dedicated Human Resources team to assist employees with enquiries or complaints. The University's Integrity and Standards Unit assists non staff with enquiries or complaints. If staff remain unsatisfied or do not feel comfortable to approach Human Resources or the Integrity Standards Unit, they are able to lodge a dispute or grievance under UWA policies. In addition, the University is subject to the *Corruption, Crime and Misconduct Act 2003 (WA)* that compels University employees as 'public officers' to report instances of crime or corruption. *The Public Interest Disclosure Act 2003 (WA)*, affords protection for UWA employees who report instances of improper conduct.

OUR SUPPLY CHAIN

Geographic Risks

Some countries may have higher risks of modern slavery due to poor governance, weak rule of law, conflict, corruption, displacement, state failure to protect human rights, migration flows and socio-economic factors like poverty or widespread discrimination. [The Global Estimates of Modern Slavery](#) report (2022) indicates that there are 49.6 million people living in situations of modern slavery on any given day. Figures show that the problem is getting worse, with 10 million more people forced into modern slavery since the previous figures were released in 2017. The largest share of forced labour occurs in business enterprises of all sizes linked to the broader market economy, in sectors including services, manufacturing, construction, agriculture, and mining and quarrying. The [World Population Review](#) identified the top 6 countries with the highest levels of modern slavery as India, China, Pakistan, Bangladesh, Uzbekistan and North Korea.

Leveraging the capabilities of the FRDM modern slavery risk management tool, it was identified that in 2022 over 99.5 percent of UWA's spend was purchased from suppliers in low-risk geographic locations, in line with previous reporting years. Analysis identified that a small spend on equipment and consumables, and professional services with vendors in China and India, the top two countries at risk from modern slavery. FRDM data did not indicate any adverse media reporting or heightened risk factors relating to the identified suppliers. UWA will investigate these vendors and spending categories further in 2023.

Category Risks

Certain sectors may have high modern slavery risks because of their characteristics, products or processes. Likewise, certain products and services may have high modern slavery risks because of the way they are produced or provided. UWA has previously identified relevant high-risk industries that it procures goods and services from in construction, electronic services and consumables, PC desktops and notebooks, and cleaning and

waste and security. The FRDM tool has allowed UWA to undertake a detailed risk-based analysis of these categories, enhancing the effectiveness of category management activities and risk mitigation processes.

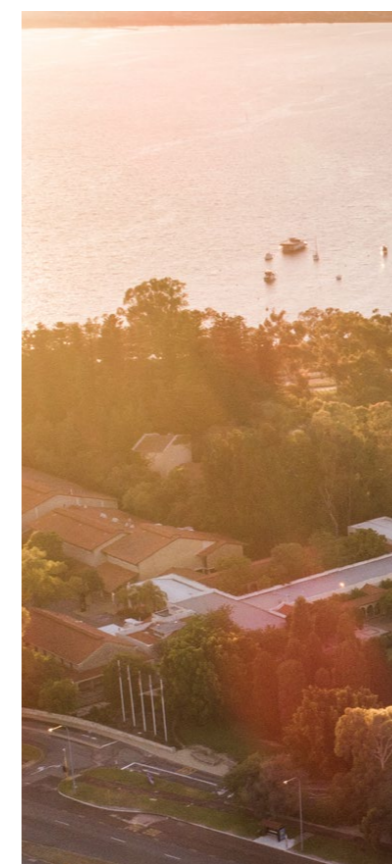
Procurement Process Risks

Generally, the larger and more complex the supply chain is, the harder it can be to identify and monitor modern slavery practices. Sub-contracting will also increase the risks of modern slavery. It is acknowledged that formal procurement policies and processes have an important role to play in reducing the risk of modern slavery in UWA's operations and supply chain by more effectively screening and assessing suppliers during the key phases of procurement activity, including the initial identification of suppliers, the evaluation of goods and services, and the formal contracting and onboarding of suppliers at the conclusion of a competitive selection process. To support and encourage positive change in the conduct of suppliers, the processes of identifying, engaging, evaluating and contracting with suppliers must address modern slavery risks and incorporate

reasonable and appropriate mitigations.

UWA has worked collaboratively with the Australian Universities Procurement Network (AUPN) to identify improvement opportunities to our current processes and practices. These have been captured and prioritised to address the key risk of entering into contractual relationships with suppliers which currently or historically have engaged in modern slavery. Over the preceding reporting periods, UWA has taken incremental steps to improve documentation, procedures, and checks and balances across the following elements of our procurement processes:

- Supplier identification and pre-qualification, including risk analysis and categorisation
- Competitive evaluation and due diligence, including tender criteria and process templates
- Onboarding and induction, including ongoing relationship management plans
- Contractual frameworks, including legal terms and key performance indicators
- Training level of procurement staff, in relation to modern slavery awareness and remedial processes.



Actions Taken to Assess and Address Risks

OUR MODERN SLAVERY WORKING GROUP

The role of the Modern Slavery Working Group is to provide a governance structure, under the direction of the Office of the Chief Financial Officer, to address the risk of modern slavery in UWA's operations and supply chain. Under this framework the Working Group identified areas across UWA's operations and supply chains with potential exposure to the risk of modern slavery and engaged with representatives from a broad cross-section of UWA to enable adequate understanding and oversight of those risks.

The Working Group comprises representatives across:

- Governance (including Legal)
- Finance
- Human Resources
- UWA Modern Slavery Research Cluster (academic representation)
- Student Life
- Campus Management (facilities)
- The University Club of Western Australia
- UWA Sport
- Perth International Arts Festival
- UWA Accommodation

The Working Group and the identified representatives are responsible for the coordination and preparation of this Statement as well as facilitating the future planning and oversight of modern slavery risk mitigations and remedies. In 2022 the role and composition of the Working Group was reviewed and updated to maintain alignment with current operational structures and ensure a more streamlined approach to statement preparation, along with more effective development, targeting and oversight of modern slavery initiatives going forward.

The Working Group has identified that a plan will be required to meet these responsibilities, which will be developed in accordance with UWA's commitment to continuous improvement. This will enable UWA to re-prioritise actions to meet the needs of the business and to ensure the focus of the activities align with current and future legislative requirements in modern slavery reporting.

OUR STUDENTS

Managing modern slavery risks for our students

The primary risk of student exploitation exists across arrangements in which students independently enter into unpaid placements or internships that are not-for-credit with external organisations. For international students this also includes employment in Australia, which may be exploitative, or involve sophisticated scams that could result in modern slavery.

Assessment of risk overall is low, however it is acknowledged that there may be elevated risk of modern slavery across placements undertaken with host organisations overseas, placements undertaken via third party providers, external employment arrangements for international students, and potential scams.

UWA is working towards developing appraisal processes of independent providers of work experience and placement opportunities. Third party providers of co-curricular activities seeking official badging recognition are asked to self-declare their observance of guidelines under the *Modern Slavery Act 2018* (Cth) and publication on the Modern Slavery Register (as applicable).

To mitigate risk and raise awareness of exploitation, UWA provides information to international students

of the potential risks when undertaking employment in Australia during their orientation, onboarding and when preparing for employment. International students are also supported through the provision of a dedicated International Student Support team, which includes an identified advisor for students with federal scholarships through the Department of Foreign Affairs and Trade and third-party sponsorship agreements.

UWA performs a preliminary check in line with the *Fair Work Act* of all student job advertisements prior to publishing via the jobs board. A message requesting that the student performs their own due diligence and seeks advice prior to signing a contract is added to the job advertisement. For unpaid opportunities, a link is provided to the *Fair Work Act*.

All Work Integrated Learning (WIL) placements are assessed by the WIL team or associated placements office. Students are only placed where there is a formal agreement between the host and UWA in effect. There are several check-in points with students on their placements and a post-placement evaluation. UWA-approved Student Placement Agreements comprise obligations under the *Fair Work Act 2009* (Cth) and students are counselled prior to embarking on Placement Agreements.

UWA also provides information of ongoing support services.

Managing modern slavery risks in student recruitment.

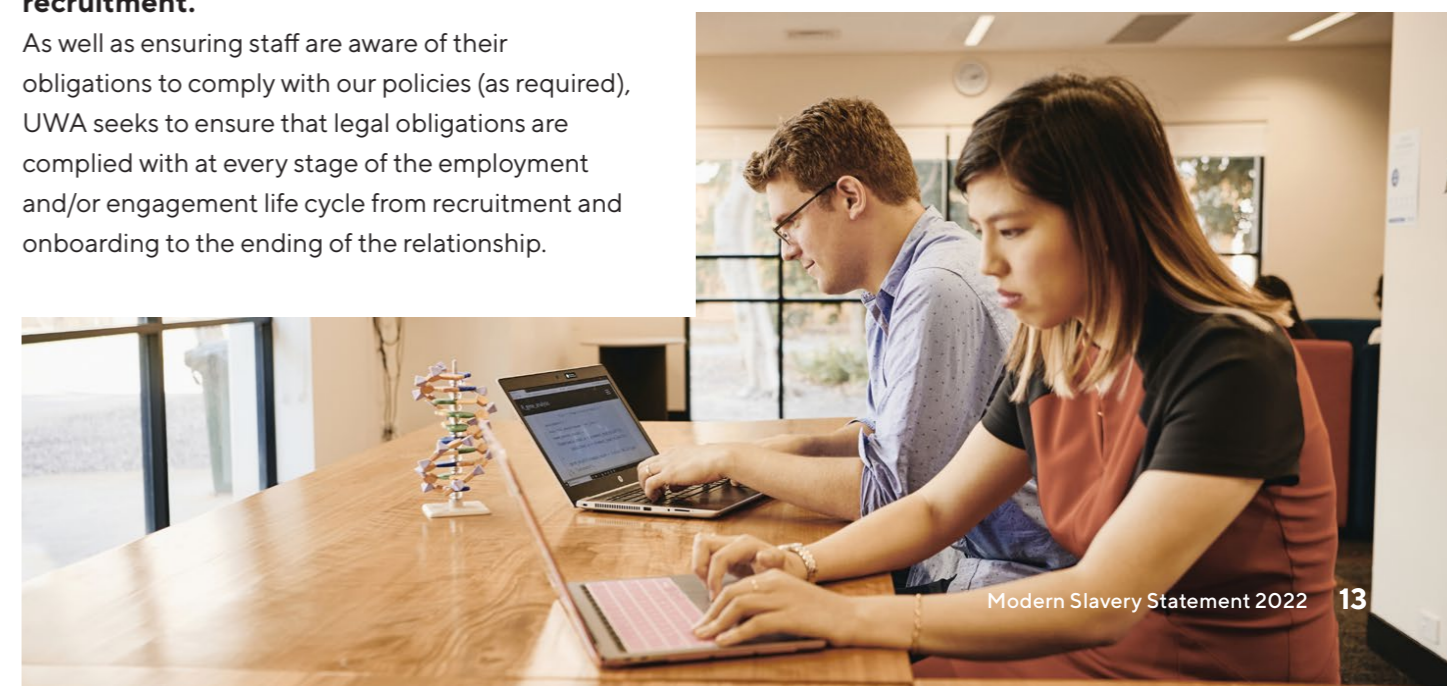
As well as ensuring staff are aware of their obligations to comply with our policies (as required), UWA seeks to ensure that legal obligations are complied with at every stage of the employment and/or engagement life cycle from recruitment and onboarding to the ending of the relationship.

UWA undertakes due diligence on scholarship/sponsorship body/organisation/ individual (entity) with whom UWA enters a contract. Should concerns of acts of modern slavery be raised as a result of this due diligence process, outcomes of reviews, throughout the duration of agreement, or through other means of identification, UWA is committed to appropriately addressing these with the contracted party.

UWA Future Students Recruitment portfolio within The Office of the Deputy Vice-Chancellor (Education) ensures compliance with Education Services for Overseas Students (ESOS) and ESOS National Code, working only with education agents and third parties who have been vetted, and who have references from other tertiary institutions.

UWA's in-market teams, agents and on-campus staff advise students appropriately of their rights and obligations and respond promptly to and investigate complaints or concerns students raise. UWA's engagement network with other Australian institutions such as Universities Australia and the International Directors Forum allows for broader awareness and identification of any industry concerns of modern slavery.

UWA is monitored through the TEQSA compliance framework in relation to universities meeting their obligations under ESOS and the National Code.



OUR EMPLOYEES

In managing modern slavery risks in the workplace, UWA:

- ensures staff are aware of their obligations to comply with our policies;
- ensures that all legal obligations are complied with at every stage of the employment life cycle from recruitment and on-boarding to the end of the relationship;
- does not charge staff for the costs associated with their recruitment or engagement; and
- ensures staff have the appropriate working rights to work in the country within which they are working.

UWA is committed to continuous improvement and conducts reviews of relevant policies to ensure ongoing compliance with the relevant legislation and minimise risks of Modern Slavery in its workplace. This was completed through a review of all employment policies in 2022.

To minimise the risks associated with unpaid appointments (volunteering, vocational placements or work experience), UWA is committed to assess its current practice and introduce appropriate mechanisms to ensure a person is a genuine volunteer or intern and would not be entitled to payments or other entitlements under UWA's Enterprise Agreements or policies.



OUR INVESTMENTS

UWA has Environmental, Social and Governance (ESG) risks and considerations outlined in its Investment Policy Statement (IPS), which incorporates the requirements of UWA under the *Modern Slavery Act 2018* (Cth) and the expectations of our Implemented Consultant and Investment Manager(s) to assess and address this risk and report on the issue in line with the regulations and with the IPS policy. Compliance with the IPS and operations of investment consultant is overseen by the UWA Investment Committee, a standing committee of Senate.

OUR SUPPLY CHAIN

Modern Slavery Risk Platform (FRDM)

In 2022 UWA deployed the FRDM (pronounced freedom) tool, the AUPN's selected technology enabler to tackle modern slavery within supply chains. The platform algorithmically identifies modern slavery risks throughout the AUPN member universities' supply chains, enabling UWA to make informed decisions and take action to address modern slavery risk. Via the tool, UWA has been able to augment its modern slavery mitigation outcomes by accessing:

- Supplier assessments and scoring
- Sub supplier visibility
- Supplier data cleansing/coding
- Adverse media reporting
- Supplier onboarding tools
- Templates

The combination of tools and resources made available to UWA via FDRM will continue to provide vital support to the UWA procurement team in performing the following activities:

- Developing content for the annual modern slavery statements
- Qualifying suppliers for modern slavery risk and other ESG standards during tender processes
- Managing, scoring and nesting questionnaires into supplier profiles

- Viewing lower tier suppliers where modern slavery risk may be higher and/or previously unidentified
- Cleansing expenditure data to universal standards (i.e. AUPN taxonomy)
- Gaining market insight on modern slavery via articles and media on risk types tied to AUPN suppliers/industries
- Increasing the capabilities of our team to identify, understand and action modern slavery risks

Category Evaluation

The FRDM risk management tool was used to conduct an analysis of modern slavery risk levels against the entirety of UWA's 2022 non-salary operational expenditure. This analysis identified that almost 96% of the UWA supply chain was serviced within low-risk categories in 2022. There was less than 2% of UWA's expenditure in categories with a high-risk classification. The high-risk category expenditure was predominantly composed of suppliers of electronic consumables, software, computers and peripherals, and wireless communications equipment. The remainder was mostly comprised of marketing and legal services, supplied through corporations located in Australia, but with overseas offices in countries listed as moderate or high-risk locations for modern slavery. Additional analysis revealed that no Tier 2 or Tier 3 business partners within UWA's supply chain were categorised as high-risk.

AUPN Engagement

UWA participates as a member of the AUPN in their Modern Slavery program, which provides synergy with other universities in making a larger impact in identifying and addressing modern slavery in our supply chain.

UWA has sought to upskill its procurement team in understanding modern slavery, the legislation surrounding modern slavery and the ramifications to our supply chain and operations. This has been, and continues to be, achieved by collaboration with the AUPN, through participation in forums, webinars and conferences and from research of

publications, toolkits and assessments provided by independent bodies such as Walk Free, Fair Supply and Unchained Solutions.

Enhancing the Procurement Process

Activities completed to date include:

- Incorporation of Modern Slavery clauses into UWA's standard terms and conditions of supply, including Purchase Order, Goods and Services, and Consultancy agreements
- Development of modern slavery KPI's for inclusion in supplier contractual agreements
- Inclusion of modern slavery evaluation criteria in tender documentation and associated due diligence processes
- Training of procurement staff using modern slavery e-modules (identifying and assessing modern slavery, and managing modern slavery risks)

Activities scheduled for continued refinement and roll-out include:

- Modern slavery risk assessment tool and remediation process
- Development and delivery of modern slavery awareness training across all UWA stakeholder groups

UWA continues to work collaboratively through its Modern Slavery Working Group and in consultation with the AUPN to identify further improvement opportunities to our current procurement processes and practices.



Assessment of the Effectiveness of Our Actions

OUR STUDENTS

UWA is satisfied that its current policies and procedures have been effective in minimising risks of Modern Slavery to the student body. To date, UWA has not identified any instances of modern slavery and has not received any grievances from any prospective or current students that they may have been subject to modern slavery.

As approximately 2% was identified as high-risk in the IT equipment and services categories, UWA procurement engaged internally to ensure that appropriate risk analysis is conducted in relation to the procurement of equipment and services from such suppliers, with mitigating actions undertaken in the development and delivery of appropriate procurement strategies and competitive processes, including specification development and contract frameworks.

OUR EMPLOYEES

UWA is satisfied that its current policies and procedures have been effective in minimising risks of Modern Slavery in its workforce. During 2022, UWA did not identify any instances of modern slavery or receive any grievances from any prospective staff or current staff that they may have been subject to modern slavery.

AUPN Supplier Self-Assessment Questionnaire (SAQ)

UWA supports the ongoing process of the development of a unified SAQ in the FRDM tool. UWA's historical experience in conducting its own SAQ process on an annual basis has been adversely affected by poor completion/return rates, coupled with increasing resistance to participation by suppliers, due to multiple surveys being issued across the sector on a continual basis.

OUR SUPPLY CHAIN

Supply Chain Assessment

In 2022 no goods and services were purchased from high-risk construction suppliers. All expenditure in that category was under the low and medium-risk classifications in FRDM. All high-risk suppliers providing electronic services and consumables and PC equipment were located within Australia and accounted for less than 2% of total expenditure in 2022.

The AUPN Modern Slavery Working Group intends to develop a SAQ to be issued via the FRDM tool and conducted a pilot process in 2022. This collaborative approach across the 38 participating universities should reduce the resistance in the market to the multiple SAQ's issued for completion. It will act as a one stop shop for responding to all the universities, will be run through the FRDM tool, and will enhance our industry insights into our respective supply chains.

UWA has been able to leverage the FRDM tool to pro-actively monitor supplier and expenditure levels in those high-risk areas. This information is used to consult with UWA stakeholders to ascertain the overall level of risk in engaging with such suppliers, and agree to any necessary mitigating actions reflecting legal, financial, operational and procurement requirements.

Until a combined AUPN SAQ is fully developed and rolled out, UWA will continue to leverage the FRDM tool to perform spot checks and risk-based analysis of suppliers, corresponding with scheduled procurement and category management activity and/or queries or complaints from internal or external sources.

Contractor Management Framework

UWA has commenced the process of developing a UWA-wide Contractor Management Framework, which will incorporate numerous improvements to supplier identification, evaluation, contracting, onboarding, and monitoring. UWA procurement will work with key stakeholders to develop and roll-out this framework, to ensure that modern slavery requirements are reflected in resulting policies, processes and communications.

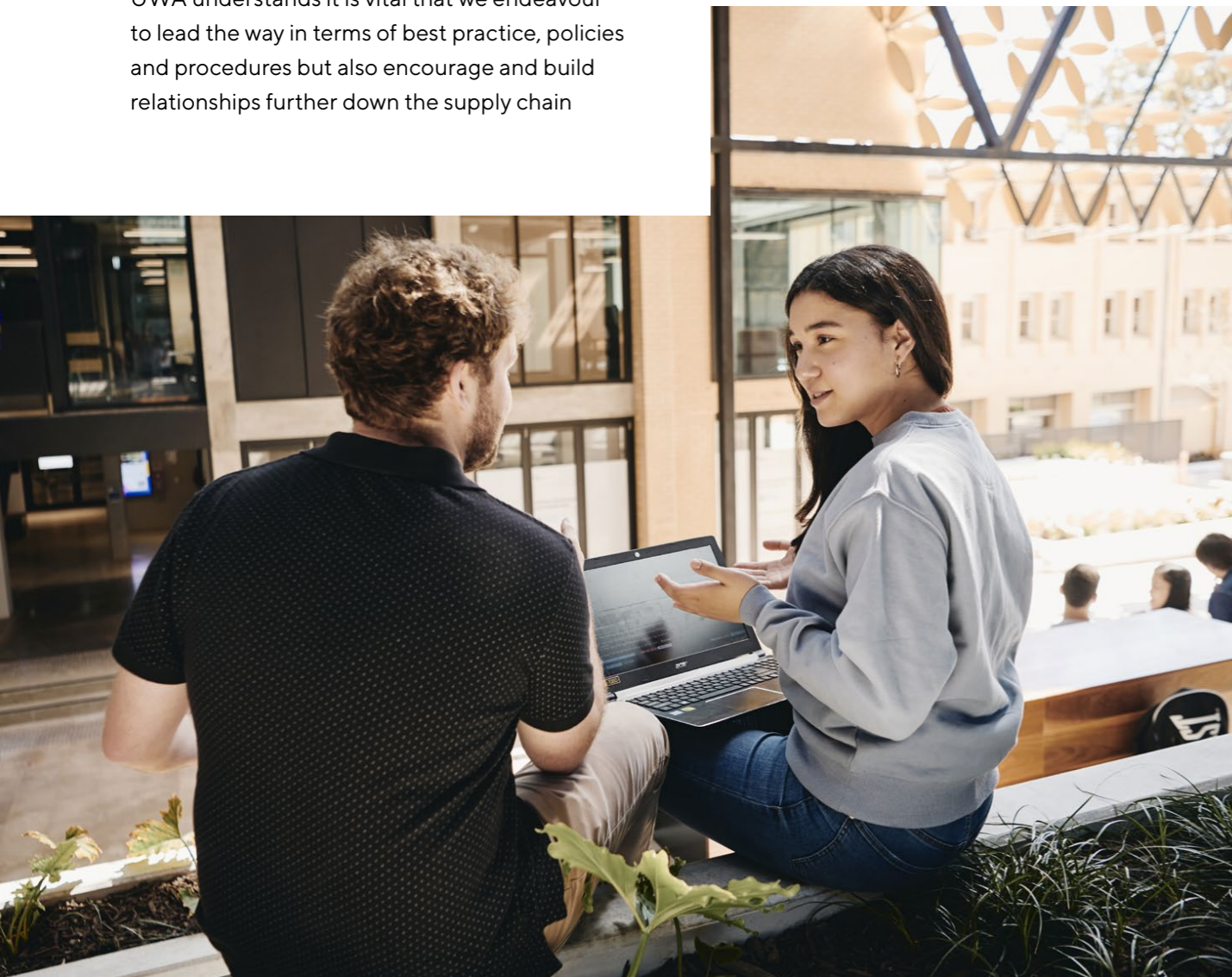
UWA Modern Slavery Plan

UWA has previously stated its aspiration to develop a modern slavery plan. Under revised Working Group membership, commencement of the plan will start in 2023.

As a reporting entity and as an institute of learning, UWA understands it is vital that we endeavour to lead the way in terms of best practice, policies and procedures but also encourage and build relationships further down the supply chain

to address modern slavery and wider ESG responsibilities. Through the development of a plan and via ongoing AUPN engagement, the mechanisms and measures identified within this Statement will be developed to further investigate our supply chain with a focus on medium to high-risk supply.

UWA is committed to identify, assess, mitigate or remediate any real or perceived instances of modern slavery within its operations and supply chain. We will continue to develop and improve our engagement process across UWA through the Modern Slavery Working Group.



Our Process of Consultation with Controlled Entities

OUR SUBSIDIARIES

UWA's subsidiaries are:

The University Club of Western Australia Pty Ltd

- Principal Activity - Events and Function Centre

Perth International Arts Festival Ltd

- Principal Activity - Arts and Culture Events

UWA Sport Pty Ltd

- Principal Activity - Sports and Recreational Activities

UWA Accommodation Services Pty Ltd

- Principal Activity - Student Accommodation

UWA Accommodation Holdings Pty Ltd

- Principal Activity - Hotel Operator. Established in 2022, with trading commencing in 2023.

For the purposes of this Statement, subsidiaries were asked to provide details of current policies, processes and activities in place to address the risk of modern slavery. All subsidiaries will engage further with the Working Group and UWA procurement to identify and mitigate supply chain risks going forward.

The University Club of Western Australia Pty Ltd (University Club)

The University Club has identified the international farming of coffee beans as being at risk of potential modern slavery activities. The University Club supplier is however certified as Fair Trade and has given a commitment that products are sourced and manufactured ethically. Where possible The University Club aims to source locally within WA or within wider Australia minimising the risk of unethical agricultural practices. The University Club also remains in line with industry award and NES conditions to ensure fair treatment of all staff, including non-resident visa holders.

In relation to sourcing processes, The University Club utilises the UWA sourcing and contract templates and has participated in supplier Self-Assessment Questionnaires and contributing to the UWA Modern Slavery plan.

The University Club ensures the equal treatment of all staff and conducts all recruitment and selection processes in a fair and confidential manner while aligning to the *Fair Work Act 2009* (Cth) and the requirements of the vacant position.



**Perth International Arts Festival Ltd
(Perth Festival)**

The Perth Festival’s risk assessment of current activity is deemed to be minimal in relation to modern slavery. The Perth Festival acknowledges that in the arts there is risk of non-payment to performers and other artists, however it is vigilant in ensuring that these practices do not happen. The Perth Festival has a dedicated People team to ensure fairness in all aspects of their activities and focuses on ensuring that all staff and artists are paid correctly and at the appropriate rates by undertaking regular contract reviews, confirming salary advice with Live Performance Australia and having a system of checks and balances across its operations. In 2022 we undertook a bench-marking process to ensure that wages were comparable across Australia and locally in the arts industry. Adjustments were made based on these results.

UWA Sport Pty Ltd

Staff of UWA Sport fall under the appropriate safeguards and agreements applied by UWA.

UWA Sport has functions dedicated to People, Culture and Inclusion with oversight on the safety and wellbeing of its staff. While UWA Sport’s supply chain includes some high-risk categories such as sporting goods and uniform suppliers, it endeavours to source locally where possible to reduce exposure to modern slavery risks in overseas countries where employment safeguards may not be as stringent. Further, UWA procurement processes and systems are used for large acquisitions and projects.

UWA Accommodation Services Pty Ltd

This subsidiary does not have any staff and is not an operating entity. This entity processes incentives under the National Rental Affordability Scheme Incentive, that UWA receives from the government as part of an accommodation affordability scheme. Operation and management of the property and tenancy management services are performed UWA.





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