

Modern Slavery Statement

2025 Financial Year



Flinders
University

FEARLESS

Contents

	About Flinders University	3
Part A	Reporting Entity	4
Part B	Structure, Operations and Supply Chains	5
Part C	Risks of Modern Slavery Practices in the Operations and Supply Chains of the University and Subsidiaries	6
Part D	Actions Taken to Assess and Address Risks	7
Part E	Assessment of the Effectiveness of Actions	8
Part F	Consultation	9
Part G	Other Information	10

Acknowledgement of Country

We respectfully acknowledge the Traditional Owners of the lands on which our campuses are located across South Australia and the Northern Territory. These lands are home to the Arrernte, Dagoman, First Nations of the South East, First Peoples of the River Murray and Mallee region, Jawoyn, Kurna, Larrakia, Ngadjuri, Ngarrindjeri, Ramindjeri, Warumungu, Wardaman, and Yolngu peoples.

We honour the enduring connection of these Nations to Country, culture and community, and pay our respects to Elders past and present, whose wisdom continues to guide us.

About Flinders University

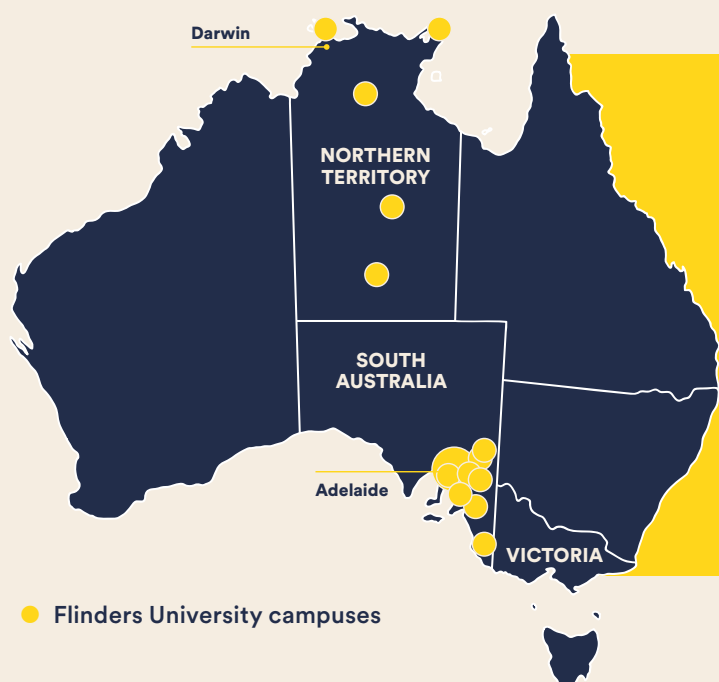
Established in 1966, we are building on almost 60 years of achievement with a vision to be internationally recognised as a world leader in research, an innovator in contemporary education, and the source of Australia's most enterprising graduates.

Headquartered in Adelaide, South Australia, we offer exceptional teaching on campus and online, with a physical presence extending across multiple locations.

With core values of integrity, courage, innovation and excellence, and an underlying ethos of being student centred, Flinders University has a bold mission of changing lives and changing the world.

As we enter an era of disruptive change and remarkable technological innovation, Flinders is well prepared for this unpredictable, exciting future.

Our strong network of external links keeps our work dynamic, enabling us to connect across barriers to create enterprising solutions for the future, to make a difference by changing lives and, ultimately, the world.



South Australia

Bedford Park

City Campus

Tonsley

Regional SA and VIC

Berri

Renmark

Mount Gambier

Victor Harbor

Murray Bridge

Nuriootpa

South-western
Victoria

Northern Territory

Darwin

Alice Springs

Nhulunbuy

Katherine

Tennant Creek

Part A

Reporting Entity

This is Flinders University’s modern slavery statement pursuant to the Modern Slavery Act 2018 (Cth) (the Act). This statement sets out the actions taken by Flinders to identify, assess, and address modern slavery risks across our operations and supply chains in the financial year period 1 January 2025 to 31 December 2025.

Flinders University (ABN 65 542 596 200) is a reporting entity for the purposes of the Act as it is an entity that carries on business in Australia with a consolidated revenue of over \$A100 million, during the reporting period.

Flinders is a statutory body established under section 3 of the Flinders University Act 1966 (SA). Our statutory functions are outlined in section 4 of the Act. Under the Act, the Council is the governing body of the University (s5(2)), with the Vice Chancellor the principal academic and Chief Executive Officer (s16(1a)). Flinders is committed to eliminating all forms of slavery and human trafficking from our operations and supply chain, in keeping with our mission “to change lives and change the world”, and supported by our “*Making a Difference – the 2025 Agenda*”.

Flinders has been working closely with the Australasian University Procurement Network (AUPN), as a member of the University Anti-slavery Working Group, where a sector wide effort to analyse, identify, educate and address modern slavery within supply chains has been progressing.

Making a Difference: The 2025 Agenda

Released in May 2016, a bold strategic plan focused on our People and Culture, Research, Education and Engagement and Impact with the aim of elevating Flinders into the top ten Australian universities by 2025.

During the reporting period, Flinders’ strategic plan, *Making a Difference: The 2025 Agenda*, outlined the University’s vision and mission for the coming years.

Flinders University’s vision is to become internationally recognised as a world leader in research, an innovator in contemporary education, and the source of Australia’s most enterprising graduates.

Our mission: to change lives and change the world.

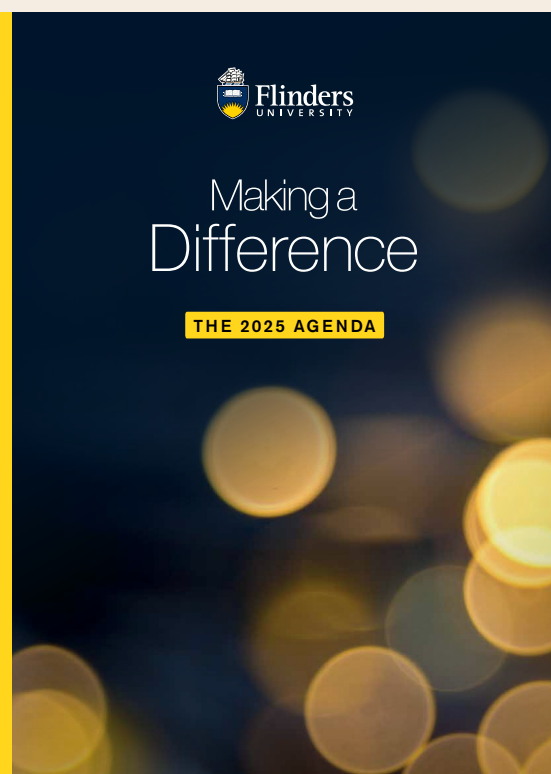
The plan is based on our four pillars:

People and culture

Research

Education

Engagement and impact.



Part B

Structure, Operations and Supply Chains

Flinders University is a public university headquartered in South Australia with a footprint that extends throughout regional and remote Australia.

Ranked in the top two per cent of world universities, Flinders is globally focused and locally engaged with a reputation for innovative research, excellence in contemporary teaching and learning, and exceptional student experience.

Our main campus is located at Bedford Park in Adelaide. Other campuses include the high-tech Tonsley campus and our Flinders City Campus at Festival Plaza in the heart of the city. Our Northern Territory Medical Program supports students to complete a Flinders Doctor of Medicine in Darwin through facilities in Alice Springs, Katherine and Nhulunbuy. Internationally, we deliver joint courses with leading universities in China, Hong Kong, Malaysia, Singapore, and Indonesia.

Flinders University’s research strengths include biomedical and clinical sciences, culture, policy and society, health and human behaviour, molecular science and technology, defence, engineering, water and environment.

We offer undergraduate and postgraduate courses for a total of around 27,270 students and host around 7,161 international students from approximately 95 countries. Our main campus includes on-site accommodation for 560 students.

Flinders employs 2,332 full time equivalent staff across all campuses, with 1,015 academic staff and 1,317 professional staff as at 31 December 2025. Staff have the ability to join a union, with the predominant union representing staff being the National Tertiary Education Union (NTEU). The employment conditions of Flinders staff are covered by an Enterprise Agreement for the period 2023 to 2026.

Flinders University has a diverse supply chain that is common across Australasian Universities. Flinders has a spend profile that is distributed across a broad range of industries. The primary categories of spend for the University include:

- Construction and Minor Works
- Information Technology, including hardware, software and advisory
- Facilities Management, including cleaning, HVAC, and maintenance
- Professional Services, including advisory, and
- Laboratory Equipment and Supplies.

The University has established contracts for many of these categories with first tier suppliers, many of whom are reporting entities under the Modern Slavery Act. A significant percentage of Flinders spend, however, is with smaller non-reporting entities.

The majority of Flinders spend is with suppliers based in Australia (>95%), with spend across a broad range of industry sectors. Our major international spend in 2025 was with the United States of America, the United Kingdom, China, Canada, and Netherlands. Overall, 3609 suppliers were used in 2025, across 48 countries (see table below).

Flinders also has a controlling position with five controlled entities:

- FCD Health Ltd
- Flinders Partners Pty Ltd
- Flinders University Sports and Fitness Inc.
- Flinders Academy Pty Ltd
- Aged Care Research & Industry Innovation Australia Limited

Flinders Partners Pty Ltd’s procurement activities are conducted by the University and in accordance with the University’s operations and policy framework. FCD Health Ltd, Flinders University Sports and Fitness Inc, Aged Care Research & Industry Innovation Australia Limited and Flinders Academy Pty Ltd operate independently of the University.

Top 10 Countries by Spend	% of 2025 Spend	Level of Vulnerability to Modern Slavery (%)*
Australia	96.01%	7
United States of America	1.10%	25
United Kingdom	0.36%	14
China	0.28%	46
Canada	0.26%	11
Netherlands	0.18%	6
Vietnam	0.17%	44
Norway	0.15%	1
Ireland	0.15%	9
Hong Kong	0.13%	28

* Source – 2023 Global Slavery Index

Part C

Risks of Modern Slavery

Practices in the Operations and Supply Chains of the University and Subsidiaries

The nature of Flinders University’s operations and procurement activities, together with those of the entities it owns and controls, gives rise to modern slavery risks broadly consistent with those faced by the Australian higher education sector.

The University procures a diverse range of goods and services across its operations, including categories commonly recognised as presenting elevated modern slavery risks. These include information and communications technology (ICT) hardware such as laptops, desktop computers and mobile phones, construction, cleaning services, and specialist goods used in research and teaching activities.

During the 2025 reporting period, Flinders University’s procurement spend was reviewed using the Australasian Universities Procurement Network (AUPN) Anti Slavery Dashboard. This analysis identified higher risk spend categories including desktop hardware, commercial cleaning, medical and laboratory supplies, scientific equipment, software, and construction and building repair. These categories are associated with global supply chains, labour intensive production processes, or complex subcontracting arrangements that may have exposure to modern slavery risks.

Procurement in these categories is predominantly undertaken through first tier suppliers based in Australia. In many cases, Australian suppliers act as resellers or distributors of goods manufactured offshore. While the University’s direct visibility and influence beyond first tier suppliers is limited, Flinders University recognises the importance of improving understanding of supply chain risks and encouraging supplier awareness and engagement, where practicable.

The University also has a small proportion of spend involving countries assessed as presenting high modern slavery risks. This activity is generally very small in value and is often managed under established contractual arrangements. The majority of this activity relates to international student recruitment or student related refunds.

Future reporting periods will continue to focus on identifying, reviewing and managing potential modern slavery risks across both domestic and international operations.

Top Countries by Risk in 2025		% of University spend	Level of Vulnerability to Modern Slavery (%)*
High	Philippines	0.0081%	66
High	Kenya	0.0289%	66
High	Bangladesh	0.0222%	58
High	Cambodia	0.0005%	58
High	India	0.0932%	56
High	Sri Lanka	0.0214%	56
High	Saudi Arabia	0.0039%	53
High	South Africa	0.0049%	52

* Source – 2023 Global Slavery Index



Part D

Actions Taken to Assess and Address Risks

Prior to, and during, the 2025 reporting period, Flinders University continued to operate a procurement framework that incorporates consideration of modern slavery risks into procurement decision making, consistent with the University's broader social procurement Framework.

Modern slavery assessments are applied in accordance with a risk based approach, with initial focus on higher value and higher risk procurement activities. In these circumstances, request for proposal and tender processes include questions on suppliers' approach to managing modern slavery risks. These questions are reviewed and refined based on experience and are supported through their inclusion in procurement evaluations, including the application of scored criteria as part of the social procurement element.

During 2025, the University continued to implement and communicate its Procurement Policy, which includes a strengthened focus on procurement principles such as ethical conduct, sustainability and social responsibility. The University's obligations under the Modern Slavery Act 2018 (Cth) form part of these principles, supporting consistent consideration of modern slavery risks across procurement activities.

In parallel with internal measures, Flinders University, as a member of the Australasian Universities Procurement Network (AUPN), contributed to sector wide initiatives to improve awareness and capability, identify higher risk areas within university supply chains, and support collaborative approaches to addressing modern slavery risks. This reflects a sector wide approach that emphasises collaboration rather than isolated or reactive actions. As part of this work, Flinders University participated in the AUPN Anti Slavery initiatives.

As a member of the AUPN, Flinders University participates in a coordinated, sector wide approach to identifying and addressing modern slavery risks across university supply chains. In 2025, the AUPN Modern Slavery Program undertook large scale, data driven risk assessments covering more than 180,000 suppliers across member universities, representing approximately \$14 billion in combined procurement spend. This work supported the identification and prioritisation of higher risk categories, including medical equipment, information and communications technology (ICT), and international student recruitment, informing targeted and risk based responses.

The AUPN program also places emphasis on capability building, supplier engagement and collaboration. Activities during 2025 included professional development forums, sector communications and the continued rollout of ACRATH's Educating for Change micro credentials, developed in partnership with Flinders University and the University of South Australia. Supplier engagement initiatives included the use of supplier assessment questionnaires in the medical and laboratory consumables category, focused engagement with suppliers presenting higher risk, and continued review of modern slavery risks in the global medical gloves supply chain. In the ICT category, universities participated in electronics watch monitoring where risks such as unfair wages, excessive working hours or forced labour were identified.



Part E

Assessment of the Effectiveness of Actions

The 2025 reporting period represented ongoing improvement in Flinders University's approach to identifying and addressing modern slavery risks within its operations and supply chains. During the year, processes and initiatives continued to be implemented and refined, and areas for further improvement were identified. While progress has been made, the University recognises that it continues to build capability and maturity in this area, both for the University and for the entities it owns or controls.

Effectiveness is assessed through a combination of internal governance processes and participation in the Australasian Universities Procurement Network (AUPN) Modern Slavery Program. At a sector level, effectiveness is informed by the outcomes of supplier risk assessments, identification of higher risk categories, supplier engagement activities, remediation activity where issues are identified, and the development of sector wide guidance and tools.

Insights from initiatives such as supplier assessment questionnaires, Electronics Watch monitoring and thematic supply chain reviews are considered in the ongoing refinement of procurement practices and risk management.

The implementation of improved reporting systems during 2025 supported improved visibility of modern slavery risks across the University's supply chain, including the ability to identify higher risk expenditure. The University will continue to enhance data quality and reporting processes to further support risk identification over time.

Capability building activities also provide indicators of effectiveness. Observations regarding the volume and quality of supplier responses to modern slavery related questions during procurement processes have indicated increased awareness across both reporting and non reporting entities. Participation in sector forums, training initiatives and the rollout of ACRATH's Educating for Change micro credentials has contributed to improved awareness and understanding across the University community. Flinders University will continue to refine its approach to measuring and improving the effectiveness of actions taken to address modern slavery risks as sector wide guidance, tools and data capabilities continue to develop.



Part F

Consultation

Flinders University recognises the importance of consultation in identifying and addressing modern slavery risks within its operations and supply chains. Internal consultation occurs across relevant University functions, to support alignment between operational practices and governance oversight in the preparation and ongoing review of this statement.

The University also engages with on-campus retailers to promote ethical and sustainable sourcing practices that align with university values. This includes working with food and beverage providers to encourage responsible supply chain practices. As part of these arrangements, all coffee sold on the Flinders campus has been certified Fairtrade since 2016, with a range of other food products also meeting recognised ethical sourcing standards.

Flinders University consults with its controlled entities to support awareness of modern slavery risks and promote appropriate management practices within their operations and supply chains. The University has a controlling interest in FCD Health Ltd, Flinders Partners Pty Ltd, Flinders University Sports and Fitness Inc., Flinders Academy Pty Ltd, and Aged Care Research & Industry Innovation Australia Limited.

Procurement activities for Flinders Partners Pty Ltd are undertaken by the University in accordance with university policies, while the other controlled entities operate independently. The University also holds a reporting-level ownership interest, but not control, in Flinders Reproductive Medicine Pty Ltd (trading as Flinders Fertility). Flinders University will continue to engage with these entities to support ongoing improvements in understanding and managing modern slavery risks.

Externally, consultation is undertaken through active participation in the Australasian Universities Procurement Network (AUPN). Through the AUPN Modern Slavery Program, Flinders University collaborates with universities across Australia and New Zealand on shared risk assessments, collective supplier engagement activities and the development of sector-wide responses to identified modern slavery risks. In 2025, this included participation in forums, working groups, surveys and roundtables.

The University also benefits from consultation with external specialists and independent organisations engaged through the AUPN, including monitoring, advocacy and training partners. These engagements support access to specialist expertise, sector data and emerging best practice, contributing to the ongoing refinement of the University's approach to identifying, mitigating and addressing modern slavery risks.



Part G

Other Information

As Flinders University enters its next reporting period, it will continue to develop and strengthen its approach to identifying and addressing modern slavery risks within its operations and supply chains. This work in 2026 will be undertaken in the context of the University's long-term strategic plan, *Agenda 2035: Impact. With Purpose.*, which was developed through extensive consultation and sets the framework for how the University will deliver ethical, sustainable and socially responsible outcomes over the next decade.

Consistent with Agenda 2035's focus on impact, accountability and ethical practice, the University's forward priorities include continuing to improve procurement spend data analysis to support more effective identification and assessment of modern slavery risks. Enhanced data capability is intended to strengthen risk-based decision-making and support more targeted actions where higher-risk areas are identified. Flinders University will also continue to build awareness of modern slavery risks across its operations and supply chains, ensuring these risks are appropriately considered by staff and key stakeholders as part of university decision-making processes.

As Agenda 2035 is implemented, Flinders University will seek to embed modern slavery risk management within its broader approach to governance, ethical conduct and social responsibility. Future reporting periods will reflect the University's ongoing progress in this area, informed by sector collaboration, evolving guidance and continuous improvement.

This statement was approved by the Council of Flinders University on 21 May 2026.



Professor Colin Stirling

Professor Colin Stirling President & Vice Chancellor
21 May 2026





