

# Modern Slavery Statement **2023**





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# About this statement

**This is RMIT's fourth Modern Slavery Statement (statement) under the Modern Slavery Act 2018 (Cth) (the Act) and covers the 2023 calendar year.**

In responding to our reporting obligations under the Act, this statement describes:

- RMIT's structure, operations and supply chains
- Our consultation processes with controlled entities
- Potential for modern slavery risks across our operations and supply chains
- Actions taken to assess and address risks of modern slavery across our operations and supply chains
- How we assess the effectiveness of our actions
- Our consultation processes with RMIT's controlled entities

The reporting entity for this statement, RMIT, trading as RMIT University, comprises the following wholly owned and controlled entities:

- RMIT Holdings Pty Ltd
  - RMIT University Vietnam LLC (RMIT Vietnam)
- RMIT Spain SL (RMIT Europe)
- RMIT Online Pty Ltd
- RMIT Training Pty Ltd

These entities are primarily based in Australia, Spain, and Vietnam, and consist of all RMIT's owned and controlled entities under the Act. As active participants in the Modern Slavery Working Group, these entities were involved in the drafting of this statement and the development of the RMIT Modern Slavery Roadmap to ensure the modern slavery risks related to their operations and supply chains are fully understood and appropriately reflected in this statement.

As required by the Act, RMIT's 2023 Modern Slavery Statement was endorsed and approved by the RMIT Council on 13 June 2024.



# Vice-Chancellor's statement



**At RMIT we recognise that the way we undertake our work, and the pathways we use to reach our goals, are just as important as our ultimate achievements. Because, as a university, our culture is built on the many ways in which our work as individuals supports and empowers the lives of others, wherever we operate across the world.**

RMIT's awareness and actions to address modern slavery are maturing. In 2023, the RMIT Modern Slavery Working Group developed a roadmap to guide our approach for the next three years. Importantly, all tenders now go through a new sourcing module which provides a consistent process to supply chain due diligence.

Furthermore, we are participating in the Australian Universities Procurement Network (AUPN) University Anti-Slavery Forum. This supports member universities with regard to transparency on human rights, risk management and the fulfillment of *Modern Slavery Act 2018* (Cth) reporting requirements. The shared intention is to reduce duplication and improve our capacity to drive change where modern slavery risks are identified in supply chains.

The RMIT Business and Human Rights Centre (BHRIGHT) also continues its important contribution. Located in the College of Business and Law, the dedicated team works to address the human rights impact of business through research, education, innovation and collaboration. BHRIGHT is the first centre of its kind in Australia, running masterclasses, consultancies and design labs to develop and support current and future leaders to integrate human rights standards.

As a community, we will stand together against modern slavery. At RMIT we see education as a path to choice and opportunity in a world where we should all be able to take our fundamental human rights as given.

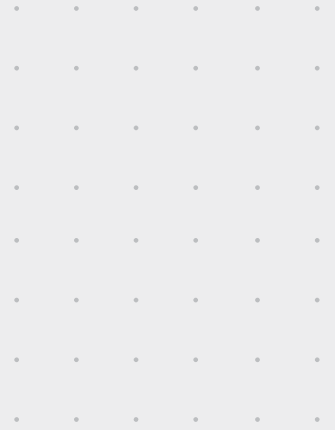
A handwritten signature in black ink that reads "Alec Cameron". The signature is written in a cursive, slightly stylized font.

**Professor Alec Cameron**  
Vice-Chancellor and President

17 June 2024

# Introduction





**RMIT University recognises modern slavery risk as a complex global human rights issue, and we continue to further our actions in pursuing the elimination of modern slavery across our operations and supply chains.**

‘Modern slavery’ describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

It is important to emphasise that modern slavery is only used to describe serious exploitation that involves the loss of freedom. Modern slavery does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal, harmful, and may be present in some situations of modern slavery.

The University’s understanding of modern slavery risk areas considers a number of factors and assesses inputs from a range of sources. Our approach is informed by expert business and human rights advisors, the UN Guiding Principles on Business and Human Rights (UNGPs), the Global Slavery Index, government advice, and ongoing developments in modern slavery risks and issues both globally and in Australia.

Our key areas of potential risk relating to modern slavery remain:

- Staff
- Students
- Supply chains (labour and materials)
- Philanthropic investments

As a signatory to the **UN Global Compact** – RMIT must operate in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights (including modern slavery), labour, environment and anti-corruption. RMIT’s awareness and actions to address modern slavery are maturing, as we strengthen our approach each reporting period.

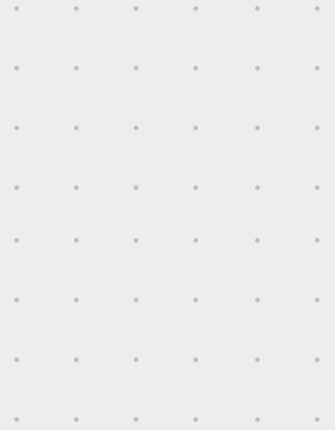


# About RMIT



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**RMIT is an international university of technology, design and enterprise with more than 90,000 students and over 11,000 staff globally. We empower people and communities to adapt and thrive across generations, with education, research and civic engagement that are applied, inclusive and impactful. Postgraduate, undergraduate, vocational education, foundation studies and online programs offer students a variety of work-relevant pathways.**

Our three substantial campuses in Melbourne are located in the City, Brunswick and Bundoora, along with other Victorian locations. We also have two campuses (Saigon South and Hanoi) and an English language centre in Vietnam and a research and innovation hub in Spain. In addition, programs are offered through partners in Singapore, Hong Kong, Sri Lanka, Indonesia, India and China, with research and industry partnerships across the globe.

Strong industry connections, forged over 136 years, remain integral to RMIT's leadership in education, applied and innovative research, and to the development of our graduates as skilled global citizens. This is why our alumni community is known for being highly employable and ready to adapt in complex times.

Alongside industry-relevance, creativity and inclusivity are hallmarks of an RMIT education. Our diverse global community of more than 500,000 graduates live, work and contribute in more than 150 countries around the world. Recognising that education is lifelong, many also return throughout their careers to refresh and update their skills or change career direction altogether.

As a collective and as individuals, we commit to respectful ways of working and understanding that acknowledge the experiences, history and knowledge of Aboriginal and Torres Strait Islander peoples. We actively strengthen relationships between Indigenous and non-Indigenous peoples for the benefit of all Australians and the communities in which RMIT operates.

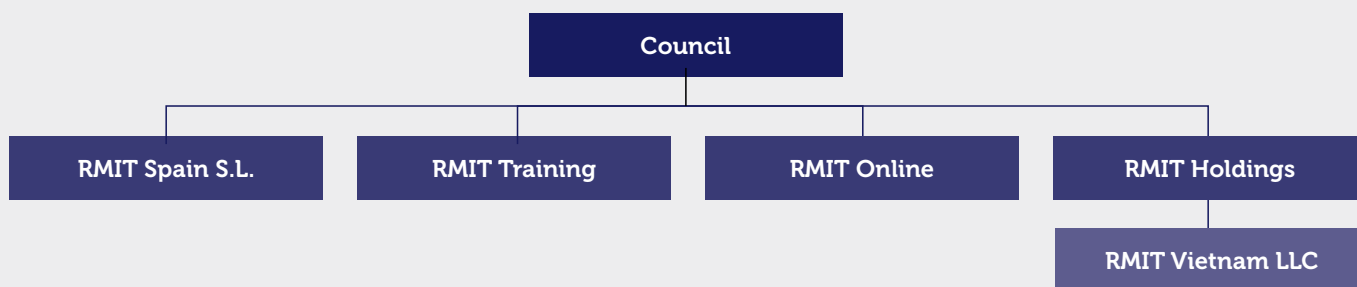
Our values are at the heart (durrung) of who we are, what we stand for, how we make decisions and the way we connect with each other at RMIT. These values unite us with a shared understanding that shapes how we live and work together on an international scale. They inform our approach to making a practical and positive difference in the communities we exist to serve and guide our modern slavery response. Because of our urban locations, we are intrinsically embedded in local communities and well-positioned to extend our positive engagement far and wide.

For more information, visit [rmit.edu.au/about](https://rmit.edu.au/about)

## Controlled Entities

RMIT, trading as RMIT University (ABN 49 781 030 034), is the reporting entity for this statement. This entity comprises the following wholly owned and controlled entities, which have been included in this statement:

Entity	Identifier	Description
<b>RMIT Holdings Pty Ltd (Australia)</b>	ABN 74 096 911 312	The holding company for RMIT University, Vietnam LLC (a private Vietnamese company) operating the business of RMIT University Vietnam.
<b>RMIT University Vietnam LLC</b>	MSDN 0302169193	A wholly owned entity of RMIT Holding Pty Ltd. Its purpose is to conduct education and training activities for both undergraduate and postgraduate levels in Vietnam. It also supports research activities with an aim to help solve critical global problems and to deliver significant economic, social and environmental impact.
<b>RMIT Training Pty Ltd</b>	ABN 61 006 067 349	A wholly owned entity of RMIT. Its purpose is to provide English language programs, English language testing services and Pathways Foundation Studies to students for higher education requirements.
<b>RMIT Online Pty Ltd</b>	ABN 38 614 454 170	A wholly owned entity of RMIT. Its purpose is to advance education and life-long learning through online modern technology and pedagogy and to provide digital learning experiences. It provides undergraduate, postgraduate, vocational and short courses of study.
<b>RMIT Spain S.L.</b>	CIF B65886012	RMIT Spain S.L is a wholly owned entity of RMIT. Its purpose is to promote RMIT's global teaching and research activities.



RMIT's controlled entities are each governed by a Board of Directors and are focused on supporting important strategic initiatives in pathways, online, and international operations.

## Governance

RMIT University was established and is governed in accordance with the Royal Melbourne Institute of Technology Act 2010 (Vic). The responsible Minister throughout 2023 was the Hon. Gayle Tierney MP, Minister for Skills and TAFE and Minister for Regional Development.

### RMIT Council

Consistent with the RMIT Act, the Council is RMIT's governing body and has responsibility for the general direction and superintendence of the University.

The Chancellor presides as Chairperson at every meeting of Council and is responsible for providing leadership to the Council in achieving its role as set out in the Act. The Chancellor ensures that appropriate mechanisms are in place for monitoring and evaluating the Council's effectiveness and enables all members to contribute as independent individuals.

The Chancellor provides advice and support to the Vice-Chancellor and facilitates constructive communication between Council and the senior management of the University.

The Council's primary responsibilities include setting the strategic direction and financial plans, monitoring University performance, ensuring effective risk management, overseeing academic activities, and monitoring major strategic projects. The Council appoints the Vice-Chancellor and President.

In 2023, the RMIT Council consisted of:

- The Chancellor
- The Vice-Chancellor
- The Chair of the Academic Board
- Three persons appointed by the Governor in Council
- One person appointed by the Minister
- Four persons appointed by the Council
- One person elected by and from students
- One person elected by and from staff

One of the primary responsibilities of the Council is to oversee and monitor the assessment and management of risk across our organisation, including commercial activities. The Council continues to provide accountability and oversight for our modern slavery risk management approach, bearing responsibility for the review and endorsement of this statement.

The Audit and Risk Management Committee (ARMC) acts on behalf of the Council to provide independent assurance regarding the University's risk, control and compliance frameworks and has oversight of its financial affairs including statutory financial reporting. It is responsible for oversight of both the Internal Audit and External Audit functions.

The ARMC holds the Council's responsibility for oversight of modern slavery risk management practices.



## University Structure

Led by our Vice-Chancellor and senior executives, our structure is comprised of several operational portfolios, as well as academic colleges and schools.

### RMIT 2023 Organisational Structure



For more information on the RMIT Governance Structure, see the [2023 Annual Report](#).



# Our Compliance Landscape



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## Policy

Our policy approach is guided by a University-wide **Policy Governance Framework** (the Framework), which describes the processes for developing, approving, reviewing and maintaining policy documents at RMIT. The Framework applies to all policy documents developed for and on behalf of the University and its controlled entities.

The Framework is intended to fulfil the following objectives:

- a) provide high-quality, consistent and transparent policy documents for staff, students and affiliates of the RMIT Group.
- b) govern the control environment for effective compliance with legislation and other mandated requirements.
- c) enable the functioning of the University and its controlled entities to achieve enhanced efficiency in their operations.
- d) provide a structure for systematic development, communication, implementation and review of policy documents.
- e) provide a structure for incorporating reconciliation and Aboriginal and Torres Strait Islander self-determination as a core RMIT value.

RMIT has committed to addressing modern slavery, labour and human rights risks in all relevant policies.

As per the Framework, policies are subject to a major review at least every five years, or more frequently where changes to legislative or other requirements necessitate a review. During the review and consultation process, an assessment is made to determine whether the policy can be strengthened to support human rights issues, including modern slavery.

The table below outlines policies that either directly link to our approach to managing modern slavery risks or provide a governance mechanism through which modern slavery can be addressed (links have been provided to publicly disclosed policies).



<b>Policy</b>	<b>Context and relevance to modern slavery</b>	<b>Review Year</b>
<b><u>Anti-Corruption and Fraud Prevention Policy</u></b>	Defines the illegal or unacceptable, high-risk behaviours that constitute corruption and fraud, and reinforces RMIT's position of no tolerance for such conduct. Outlines strategies for the management of corruption and fraud risks. Encourages the highest level of integrity in organisational culture as an essential part of RMIT's management and corporate governance framework.	Approved 2020
<b><u>Code of Conduct</u></b>	Provides guidance and defines the enforceable standards for our ways of working, ways of knowing and ways of being. Outlines how we work together as a community of professionals, academics, education practitioners and researchers, setting the standard for ethical behaviour, and guiding our culture and attitude towards the elimination of modern slavery.	Approved 2020
<b><u>Compliance Policy</u></b>	Defines the RMIT framework and objectives for the management of compliance obligations and promotion of a positive compliance culture as an integral part of ensuring good governance and operational excellence at RMIT.	Approved 2020
<b><u>Complaints Governance Policy</u></b>	Sets out the principles and governance framework that inform our approach to complaint handling. <ul style="list-style-type: none"> <li>▪ To promote a culture where complaints are welcomed as an important component of our commitment to an inclusive, professional and productive work, research and learning environment.</li> <li>▪ To establish the principles and governance framework that inform the RMIT Group's approach to complaint handling.</li> <li>▪ To ensure complainants are treated with procedural fairness and respect.</li> </ul>	Approved 2021
<b><u>Controlled and Non-Controlled Entity Policy</u></b>	Establishes the governance framework for the University's controlled and non-controlled entities to ensure the University operates in accordance with its obligations under the RMIT Act and that the RMIT University Council has appropriate oversight of all functions and activities conducted by Entities.	Approved 2021
<b>Corporate Social Responsibility Framework</b>	Provides a screening methodology and a range of tools to identify individuals, businesses or organisations that may pose an ethical or reputational risk to the University. The framework allows us to implement appropriate risk mitigation and meet our CSR obligations as a signatory to the Compact. During 2023, work commenced to merge this framework with new Third Party Due Diligence processes under development. This work will continue into 2024 to ensure it is mainstreamed into core processes and may mean the standalone framework is rescinded.	Approved 2020



Policy	Context and relevance to modern slavery	Review Year
<b><u>Inclusion, Diversity and Equity Policy</u></b>	Sets out our commitment to providing an accessible and inclusive learning and work environment that promotes diversity, inclusion and equal opportunity and is free from discrimination, sexual harm, victimisation and vilification.	Approved 2022
<b><u>Procurement and Expenditure Policy</u></b>	Ensures all procurement and expenditure activities support RMIT's strategic objectives, comply with legislative and regulatory requirements, and include consideration of quality, service, environmental and social impacts. Makes explicit reference to the <i>Modern Slavery Act 2018</i> (Cth). This policy strengthens oversight of the RMIT-controlled entities to ensure greater compliance, risk management and governance.	Approved 2022
<b><u>Risk Management Policy</u></b>	Sets out the key principles and expectations to support the effective management and oversight of risks to the RMIT Group strategy, objectives, and activities, and promote transparency and integrity in the RMIT Group decision-making processes.	Approved 2023  (Effective 1 Jan 2024)
<b><u>Supplier Code of Conduct</u></b>	Outlines our minimum requirements regarding the conduct of our suppliers of goods and services in the areas of labour and human rights, protection against modern slavery, environmental management, health and safety, corporate governance, and ethical business practices.	Approved 2020  (Reviewed annually)
<b><u>Sustainability Policy</u></b>	Articulates RMIT's commitment to advancing its sustainability ambitions as an organisation that models institution-wide excellence. Ensures our strategies, processes, supply chains and partnerships meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption to achieve a culture of integrity. The policy explicitly requires RMIT to assess and address the risks of modern slavery in our operations and supply chains through due diligence and remediation processes, as well as implementing tools to assess the effectiveness of these actions.	Approved 2020  (Review commenced 2023)
<b><u>Third-Party Complaints Procedure</u></b>  (Authority for this document is established by the Complaints Governance Policy)	This procedure applies to any third party wishing to make a complaint or raise a concern about any aspect of the operations and business activities of the RMIT Group. A third party for the purposes of this procedure is any person not eligible to raise a complaint under the various staff and student policies and procedures.	Approved 2020  (Review commenced 2023)
<b><u>Whistleblower Procedure</u></b>  (Authority for this document is established by the Anti-Corruption and Fraud Prevention Policy)	This procedure provides a way for anyone to report concerns they may have about illegal, unethical or improper conduct involving RMIT or its staff, Council members, students or researchers while providing protection to the person making the report. It does not replace existing complaints, conduct or compliance policies but provides an additional avenue for matters to be raised in relation to specific types of conduct.	Reviewed in 2023

## Risk Management

RMIT's risk management framework establishes a systematic process of identification, management and monitoring of risk, including in relation to modern slavery. The framework is supported by:

- A defined Risk Management Policy based on ISO31000:2018 Risk Management, that articulates RMIT's approach to risk management and the key principles and responsibilities to facilitate the effective management of risks.
- A Council-appointed Audit and Risk Management Committee (ARMC) which regularly monitors and reports on the adequacy of arrangements in place to ensure that risks are effectively managed and reflective of the strategy across the group.
- An annual review and regular update of the RMIT risk profile.
- Active management and monitoring by all Colleges and Portfolios throughout the year to ensure that appropriate mitigation measures are in place and risk exposures remain consistent with RMIT's objectives.
- Provision of risk management support, advice, assessment tools and training for RMIT staff.
- Execution of the annual internal audit plan, which is primarily concerned with evaluating the effectiveness of internal controls, and is risk-based to place greater emphasis on those areas of higher risk to RMIT.
- An insurance program that protects RMIT from financial impacts as a result of physical loss of, or damage to, assets and activities, as well as injuries to RMIT staff, students and third parties.

Modern slavery risks within the University's operations, entities and supply chains are considered in numerous risk domains, including sustainability, property, education, technology and procurement risk domains.

A key component of the Risk Transformation Program for 2023 included identifying specific instances of modern slavery risks across colleges/portfolios and ensuring effective controls are in place to manage these risks; this will continue in 2024.

Over the next two years, the Risk Team will lead a project to streamline third-party due diligence. The team will design, implement and embed a consistent process to assess the risks arising from all third-party activities across the organisation, allowing for effective prioritisation of treatment plans and actions to mitigate these risks. This will include a 'customer-centric' approach which provides a streamlined and efficient approach to assess the risk of new third parties.

Third parties can be engaged by RMIT for numerous reasons and through varied pathways. Examples of third parties include new suppliers, new research partners, new Work Integrated Learning (WIL) partners and new philanthropic partners. It is critical that any risks introduced by these third parties are evaluated in a timely and accurate manner utilising the input of all relevant subject matter experts and a consistent risk assessment methodology. This project presents a major opportunity to strengthen due diligence of Corporate Social Responsibility issues, including modern slavery.

## Internal Audit

Internal Audit provides independent, objective assurance and consulting services designed to add value and improve the organisation's operations. Internal Audit's mission is to enhance and protect organisational value by providing risk-based and objective assurance, advice and insight. The Internal Audit Team reports functionally to RMIT Council via the ARMC, and administratively to the Chief Financial Officer and Vice-Chancellor.

In 2023, a key internal audit focused on 'Sustainability Governance'. The objective of the internal audit was to understand and assess how RMIT governs sustainability commitments and stated values, and its expectations across the spectrum of environmental, social and governance (ESG) issues relevant to the University. This audit provided an important opportunity to test the effectiveness of our modern slavery and broader ESG response.

The internal audit included an assessment of emerging Australian sustainability reporting requirements (as selected by the University) and their relevance to, and impact on, RMIT. This included considering whether our modern slavery response would meet potential changes to the Australian Government's expectations for how entities manage modern slavery risks following the three year review of the Act.

RMIT considered these potential changes as part of the development of a Modern Slavery Roadmap to help position the University to respond to any future amendments to the legislation. The implementation of management actions resulting from internal audits are monitored, validated and reported by the Internal Audit Team to the Audit & Risk Management Committee periodically.

## Modern Slavery Working Group

The Modern Slavery Working Group continued in 2023, as a formal sub-group of the RMIT Sustainability Committee. The Sustainability Committee has the responsibility and oversight for the coordination of sustainability initiatives across all areas of the University. Its goal is to ensure sustainability principles and practices are embedded within the University's core teaching and learning, research, governance and operational activities.

The Sustainability Committee reports through the Chair (the Deputy Vice-Chancellor, Education) to the Vice-Chancellor's Executive on the University's sustainability performance and makes recommendations about sustainability-related commitments, policies, planning and partnerships. It is also responsible for oversight of the University's commitment to the UN Sustainable Development Goals.

The Modern Slavery Working Group is required to:

- 1) Provide guidance and input into RMIT's annual Modern Slavery statements.
- 2) Monitor and report on compliance obligations under the Act to the RMIT governance bodies, as required.
- 3) Bring together key stakeholders from across RMIT, including the controlled entities, to drive continuous improvement in the University's response to addressing modern slavery.

The Working Group supports the ongoing development of governance frameworks, systems and processes to ensure compliance obligations are met, that our actions are effective and that plans are in place to continuously improve.

### RMIT Modern Slavery Roadmap

In 2023, a detailed Modern Slavery Roadmap was developed, with assistance from external business and human rights advisors. This provided an opportunity to review whether our current response remains fit for purpose and identify a suite of applied practical actions the University can take over the next three years to maximise our effectiveness by further enhancing our modern slavery response.

The actions were developed through consultation with key business units and sit across the following categories:

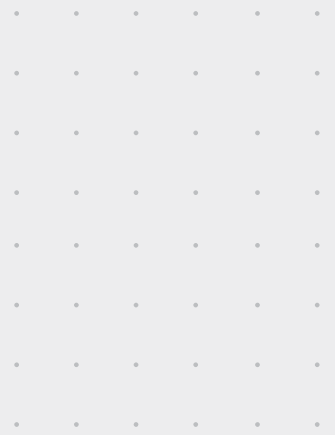
- Policy commitment
- Identifying and assessing risks
- Integrating responses and addressing risks
- Tracking effectiveness
- Communicating actions, and
- Grievance mechanisms and remediation

The roadmap aligns with the expectations for business to respect human rights set out in the UN Guiding Principles on Business and Human Rights (UNGPs). Going forward, the Working Group will proactively monitor the Roadmap implementation progress, which will provide another tool to track our effectiveness.

# Our People



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## Staff

RMIT employs just over 11,000 staff globally, comprising a workforce of professional and academic staff.

Australian onshore staff, including those employed by RMIT University, RMIT Training and RMIT Online, are based at one of our three campuses in Melbourne – Melbourne City, Brunswick and Bundoora. All RMIT University and RMIT Training staff are covered by Enterprise (Collective) Bargaining Agreements. As at 31 December 2023, Australian RMIT entities have 4,111 continuing, 1,488 fixed term and 4,571 casual staff.

RMIT Vietnam operates across three locations: with campuses in Ho Chi Minh City (Saigon South) and Hanoi, and an English Language Centre in Danang. RMIT Vietnam’s workforce is comprised of two employee types, definite (fixed term) and indefinite (continuing), in accordance with the Vietnam Labour Code 2019. Fixed-term and continuing are salaried staff while our casual employees are paid an hourly rate. As at 31 December 2023, RMIT Vietnam has 294 continuing, 714 fixed term, 275 casual staff.

At RMIT Europe (based in Barcelona, Spain), 35 employees in Spain are engaged as either permanent/ongoing, training contracts, or under internship agreements. All employment contracts are issued in accordance with the Spanish National Collective Agreement for Private Universities and in compliance with Spanish labour laws, under which very few situations for temporary employment are allowed. Interns are paid at RMIT Europe.

### Area of risk

The inherent level of modern slavery risk within our operations for directly employed staff in Australia is deemed low, given the workplace protections in place that comply with applicable labour rights legislation and the types of roles typically undertaken by our people. A comparable approach is taken for our staff in Vietnam and Spain.

Information on the protections in place for our workforce is described in the following section.

### Actions taken

- All Australian onshore employees are covered by either an applicable Enterprise Agreement or the relevant modern award and we work to ensure compliance with our obligations under relevant employment legislation, such as the *Fair Work Act 2009* (Cth).
- Labour contracts for RMIT Vietnam’s employees are prepared by our People Team (Human Resources) using templates created in accordance with the prevailing Labour Code and reviewed by an independent legal advisor. All agreements comply with Vietnam labour rights legislation, including the labour code, statutory insurance and tax laws. We continue to provide worker benefits that exceed legislative requirements under the Vietnam Labour Code 2019.
- RMIT Spain’s employment contracts are prepared by a third-party provider, and all current contracts have been prepared in accordance with the Spanish National Collective Agreement for Private Universities and are compliant with Spanish labour laws. Due to recent legislative changes in Spain, RMIT Spain can only issue temporary employment contracts for very limited reasons, e.g. maternity leave cover.

## Students

In 2023, RMIT had 91,544 students enrolled globally, including 14,559 in Vietnam.

Beyond involvement in their course of study, our student population may be engaged in other activities, either as a component of their study or as volunteering. This may include involvement in Work Integrated Learning (WIL) programs, work experience, internships or volunteering. Volunteering can include participation in one of our clubs, societies, collectives or as part of a community project or event.

RMIT prides itself on being a unique institution whose reach extends beyond its campuses in Melbourne and Vietnam, with programs offered through partners in Singapore, Hong Kong, Sri Lanka, Indonesia, India and China, with research and industry partnerships across the globe.

### Area of risk

The risk of modern slavery among our student population is not deemed high. However, there are risk factors arising from the activities of our student body that may give rise to substandard treatment, including their involvement in WIL programs, unpaid work experience, internship arrangements and volunteering.

We understand that in such situations, students may not be afforded the same protections as those provided under an employer-employee arrangement and that there is a potential for exploitation.

We also recognise that students may undertake work with third parties not connected to their studies (such as part time work) and that this may involve risks of exploitation. These risks may be heightened for international students who may not be aware of their workplace rights and help seeking pathways.

We also acknowledge that we have a role to play in educating students that may take up future careers in sectors that are at high risk for modern slavery (such as sectors that may rely on higher risk goods or services). Engaging with these students during their time at university can help ensure they are aware of how modern slavery might occur in these sectors and position them to drive change. For example, our Project Management students are taught about modern slavery risks in the construction industry.

### Actions taken

To manage the risk of substandard treatment of students, we continue to maintain a number of practices:

#### Work Integrated Learning (WIL) programs

- **Partner screening:** all prospective WIL partners and other relevant third-party organisations are screened via a desktop scan to assess their appropriateness and legitimacy. For student experience programs, a third party is used to identify partners and allocate students to these partners.

In 2023, there was a major focus on Health, Safety and Wellbeing (HSW) with the implementation of a new framework due diligence for WIL. Industry partner due diligence is now implemented across all colleges. RMIT requires all new WIL industry partners to complete the WIL due diligence form prior to signing the WIL agreement. A discipline-based, risk assessment process has been developed to identify and assess any industry-specific requirements, which provides an opportunity to look at specific sectors that are at high risk of modern slavery.

- **Partner agreements:** the WIL Partner Agreement defines the partner's responsibility for student welfare, including the provision of a safe and secure working environment.

## Global Experience Programs

The Global Experience Program uses third-party agents to arrange and oversee placements. Contracts and agreements are in place to ensure that the health, safety and wellbeing of our students is paramount during their global experiences, these include:

- International Student Exchange Agreement
- Third Party Provider Agreement
- Work Integrated Learning Agreement

All students undertake a compulsory 'Preparing for Learning Abroad' training module in which they are supported to create a safety plan in preparation for any unforeseen incidents while overseas. The module includes how to respond in the event of a travel or safety incident, how to maintain good health while abroad and responding to a medical emergency. International SOS are engaged to provide 24/7 support to students if they need urgent assistance overseas.

Any new partnership goes through the Global Partner Approval Process (GPAP), with extensive due diligence undertaken to understand country and partner risks and to ensure partners have strong values alignment with RMIT.

## Volunteering programs and activities

Following a major review of existing practices, Student Life implemented ten key recommendations to mitigate risk, enhance quality assurance and improve student experience relating to volunteering activities and engagement.

The majority of these were co-designed by students and delivered throughout 2022-23, including the establishment of the 'Student Volunteering Steering Group' and a 'Student Volunteering Quality Assurance Framework'.

The Quality Assurance Framework is made up of an internal governance structure and quality assurance instruments including:

- A Student Volunteering definition, Volunteer Agreement and Volunteer Activity Descriptions endorsed by RMIT Legal.
- A Volunteer Program Management Health Check.
- Standardised 'Volunteer Training' covering volunteer rights, responsibilities, volunteer and child safety, conduct and privacy policy, communication, inclusion and accessibility, wellbeing and support information.

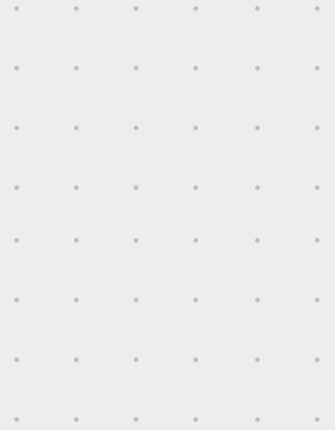
Further activities relating to the Student Volunteer program endorsement, evaluation and volunteer recognition are continuously delivered as BAU and monitored via the Student Volunteer Community of Practise and Steering Group.



# Our Supply Chain







## Context

As one of Australia’s largest tertiary institutions, RMIT has a significant impact through the University’s operational footprint and supply chain. This allows the University to leverage its buying power to drive improved practices in the supply chain and support the strategic objective of contributing to the communities we serve.

Guided by the RMIT Procurement Policy and Procedure, RMIT integrates sustainability considerations into its procurement practices including processes, responsibilities and governance. The University’s approach to sustainable procurement is aligned with the international standard, ISO 20400:2017 Sustainable Procurement – guidance (ISO 20400). The standard defines sustainable procurement as “procurement that has the most positive environmental, social and economic impacts possible over the entire life cycle”.

RMIT has a sector-specific supply chain to procure the goods and services needed to conduct our activities, which includes our entities outside of Australia.

Throughout this statement, Tier 1 in our supply chain represents the supplier with whom we have a direct relationship – we directly purchase goods and services from them. Tier 2 represents the suppliers of our Tier 1 supplier(s), Tier 3 represents the suppliers of Tier 2, and so on. We maintain formal and long-standing relationships with our contracted suppliers and undertake regular reviews of supplier relationships and contracts on an ongoing basis.

Through our Workday procurement platform, we have been able to present our total Tier 1 supplier spend for 2023, including Vietnam and Europe. This new way of reporting provides a more consistent methodology and transparency across our entities, and more granular data than was provided in our previous statements.

In 2023, RMIT engaged directly with 3,724 distinct Tier 1 suppliers across all entities (suppliers may be engaged by multiple entities).

### Number of Tier 1 Suppliers by RMIT Location

Entity	Number of suppliers		
	2021	2022	2023
<b>RMIT AUS</b>	2,906	3,587	3,724
<b>RMIT VTN</b>	599	834	894
<b>RMIT Spain</b>	67	113	111

### Total Spend by RMIT Location

Entity	Total Spend AUD		
	2021	2022	2023
<b>RMIT AUS</b>	\$395,650,062	\$391,126,660	\$438,018,330
<b>RMIT VTN*</b>	\$19,251,002	\$20,419,165	\$48,091,943
<b>RMIT Spain*</b>	\$502,051	\$1,090,260	\$1,088,502

\*These figures are based on date of invoice issued, and include total supplier spend across CAPEX and OPEX. They may be slightly different to the RMIT Annual Report due to pre-payments and accruals. RMIT Vietnam and RMIT Spain spend data is captured in AUD, with currencies converted from VND and EUR based on the average exchange applicable for the relevant calendar year.

**Figure 3: RMIT Percentage of Total Spend by Region (includes all entities)**

Region	Percentage Spend		
	2021	2022	2023
Australia	82.67%	80.29%	78.46%
Asia	6.52%	12.01%	13.92%
Europe	3.99%	3.92%	3.38%
North America	6.53%	3.67%	4.09%
Oceania (inc NZ)	0.28%	0.07%	0.10%
Africa	0.01%	0.02%	0.02%
South America	0.00%	0.02%	0.03%

In 2023, approximately 78.46% of our overall spend, across all entities, was paid to suppliers based in Australia.

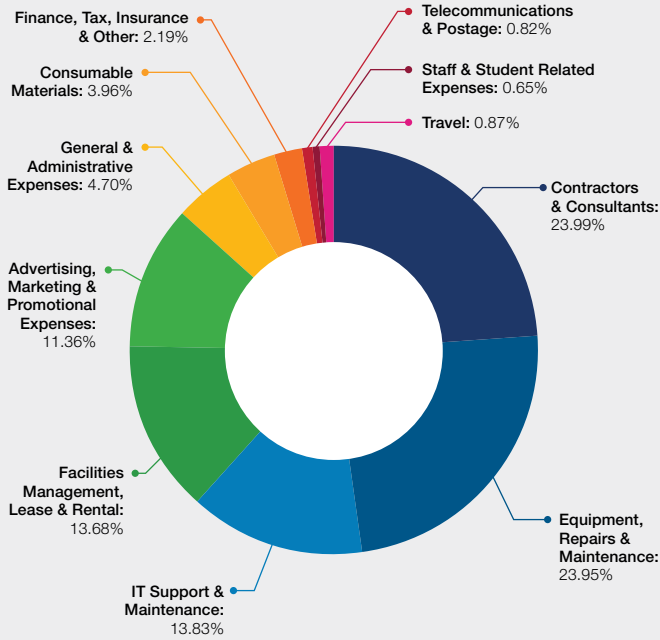
Supplier expenditure from other locations has been grouped by region, as is practical. Suppliers based in countries with a higher risk of modern slavery may be present in the regional groupings shown. We take a risk-to-people approach, recognising that supplier spend does not correlate to modern slavery prevalence and that the risk of modern slavery may be present even in our smallest suppliers.

Our supplier expenditure is ordered by spend categories, which are explained below:

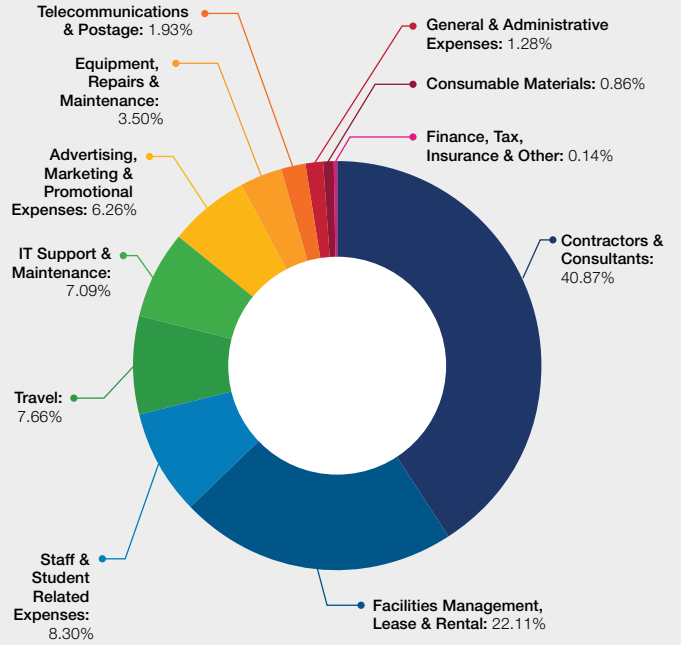
Spend category	Description
<b>Advertising, Marketing &amp; Promotional Expenses</b>	Promotional, media, marketing and event management expenditure.
<b>Consumable Materials</b>	Office consumables, printing, lab supplies and educational materials.
<b>Contractors and Consultants</b>	Includes those providing professional services to RMIT.
<b>Equipment, Repairs &amp; Maintenance</b>	Property and building maintenance, equipment and IT hardware.
<b>Facilities Management, Lease &amp; Rental</b>	Facilities management and leasing, including cleaning, waste removal, utilities, security services and car park management.
<b>Finance, Tax, Insurance &amp; Other</b>	Banking, insurance and investment management.
<b>General &amp; Administrative Expenses</b>	Document management and storage as well as items such as memberships and subscriptions.
<b>IT Support &amp; Maintenance</b>	IT software licensing and managed services.
<b>Staff &amp; Student Related Expenses</b>	OHS support, professional development and awards.
<b>Telecommunications &amp; Postage</b>	Freight, logistics, postage, storage and telecommunications.
<b>Travel</b>	University travel requirements, such as flights, hotels and car hire.

Below is the spend data by category for each RMIT entity:

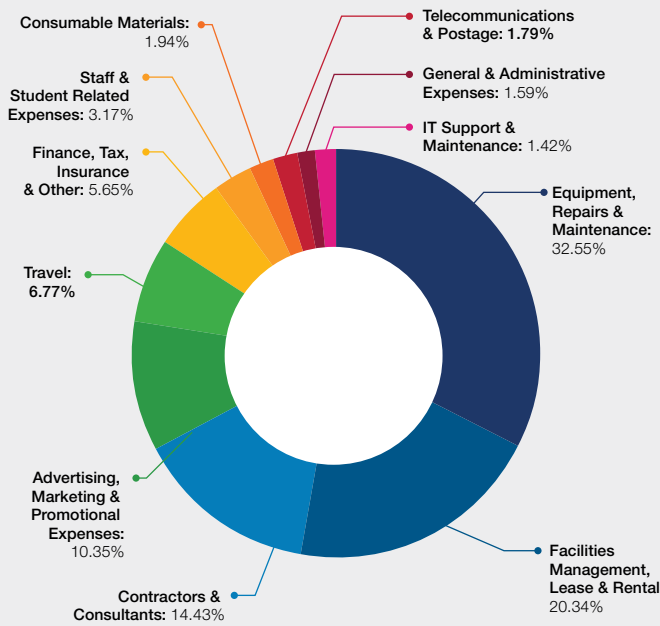
### RMIT Australia



### RMIT Spain



### RMIT Vietnam



## Managing our supply chain risks

We acknowledge that while over half of our Tier 1 suppliers are based in Australia, some of these suppliers may have complex supply chains and source inputs from higher-risk geographies. We also recognise that Australia is not immune to modern slavery risks and are committed to also monitoring our onshore suppliers for risks. Due to the limited visibility of our extended supply chain, we recognise the importance of understanding our relationship to potential modern slavery risks, in line with the UNGPs. As such, in identifying our risks, we endeavour to consider whether there is potential that we could cause, contribute to, or be directly linked to modern slavery practices.

In 2023, RMIT reviewed and revised the controls in place in relation to modern slavery compliance management. Implementation will commence in 2024 to enable progress in supplier visibility.

### Supplier and partner contracts and agreements

Our supplier and partner agreements all include specific clauses on modern slavery, including the University's standard Services Agreement, Licence to Occupy, and Purchase Order Terms and Conditions. Localised versions of these contracts are in full use by our controlled entities outside of Australia to ensure compliance with relevant legislation in the respective region. Our legal and compliance teams have confirmed the currency and appropriateness of the relevant clauses.

Current supplier and partner agreements include a right-to-audit clause. In 2023, critical Property Services vendors were audited on employment contracts and payslips, and no regulatory breaches were identified. Vendors were reminded to ensure recruitment processes and contracts, including payment conditions as agreed in the substantive agreements, are enforced. We continue to engage with our high-risk vendors throughout the year to ensure they remain compliant.

### Due diligence processes and procurement systems

The RMIT Procurement Policy and Procedures applicable to the RMIT Group explicitly prioritise compliance with the Modern Slavery Act and commitment to the triple bottom line approach regarding environmental, social and financial sustainability, including labour and human rights principles. All RMIT staff are required to proactively assess the risk profile of any proposed procurement and refer high-risk expenditures to the RMIT Procurement Team.

The RMIT Workday Enterprise Resource Planning System incorporates a common supplier registration process for all new suppliers. A supplier registration form captures key information on each supplier during onboarding, including acknowledgement of RMIT's Supplier Code of Conduct, and requests supplier responses on human rights (including modern slavery), labour standards, and environmental practices. This is then assessed based on sector and geographical risk for modern slavery. The information is made visible in summary format to all staff who use the supplier search function in the Workday system, allowing them to better identify those that have acknowledged the Supplier Code of Conduct and considered their obligations on human rights, labour standards and modern slavery.

In 2023, RMIT registered 1,294 suppliers through the Workday system; of these 57.4% were subjected to the additional CSR screening process. Following this process, 0.23% of the prospective suppliers provided an insufficient response following evaluation and were not registered as suppliers.

The CSR Framework is applied in the procurement process to meet these principles and to ensure suppliers meet the minimum requirements regarding their own ethical practices. During 2023, the CSR framework became fully embedded into core procurement processes and includes a comprehensive screening process for all prospective suppliers and the signing of the RMIT Supplier Code of Conduct as a requirement of the contract process. This mainstreaming of CSR into core Workday processes will see the framework continue to evolve into wider third-party due diligence processes in 2024.

A new Sourcing module was created in Workday at the end of 2023 – this has strengthened and further standardised processes. Suppliers undertake detailed due diligence processes (including modern slavery) and are then assessed against a new Environmental, Social and Governance (ESG) framework, comprising strategic Indigenous commitments, sustainability, diversity and inclusion, and industry engagement. This module is used across RMIT’s global operations.

In 2023, RMIT updated the Contract Management Policy and Procedure to strengthen strategic linkage obligations on the contract owners, including obligations to seek input and advice on sustainability and due diligence procedures during the procurement planning process.

Sustainability outcomes are also driven through the contract management process with existing vendors.

## Sector collaboration

In 2023, RMIT joined the **Australian Universities Procurement Network (AUPN)**, a group which represents the Australasian and New Zealand higher education sectors and works to improve excellence in procurement practice and in the skills of procurement professionals.

Part of the AUPN’s offering is the University Anti-Slavery Program. The AUPN is leading a sector collaboration to support member universities to meet the challenge of human rights transparency and risk management in their supply chains and contribute to the fulfilment of *Modern Slavery Act 2018* (Cth) reporting requirements. By working together, it is designed to minimise the duplication of activities and associated costs across individual universities, including risk assessment, implementation of systems and remediation.

As a member of this program, RMIT participates in monthly forums to share best practice and improve capability uplift on the topic of modern slavery.



## High-risk spend categories

A component of the Sustainable Procurement Plan is an annual risk assessment of RMIT's spend categories, with a particular focus on modern slavery. The assessment is done by the Procurement and Sustainability teams to ensure currency.

The following information outlines the associated example actions undertaken at RMIT in 2023 to address specific categories of suppliers which have been identified as having a higher risk of modern slavery:

### Property Services Vendors – Business as Usual Operations

#### Inherent modern slavery risks

Property Services vendors are essential to the operation of our campuses. Within the 'Equipment, Repairs & Maintenance' and 'Facilities Management' spend categories, a variety of Property Services vendors are engaged on an ongoing basis to support on-campus operations. These vendors include cleaning services, security, building maintenance, waste management, vertical transport (lifts and elevators), removals and mailroom services.

Industries of this nature may pose a key modern slavery risk relevant to service procurement, where personnel may be subject to the withholding of wages, immigration-related coercion and threats, debt bondage, confiscation of personal and travel documents, and dangerous and substandard working conditions.

#### Actions Taken

In 2023, RMIT undertook a public procurement process to renew our campus security provider contract. The new contract will commence on 1 July 2024 with express contractual obligations built upon from the incumbent contract, including provider obligation to comply with regulatory requirements, particularly anti-slavery provisions, RMIT right to audit and no subcontracting without RMIT pre-approval.

### Property Services Vendors – Construction (labour and materials)

#### Inherent modern slavery risks

Construction work performed in upgrading and constructing new buildings may present risks of modern slavery. The construction industry can be vulnerable to sub-standard working conditions, poor safety practices and worker exploitation. The risks may be driven by the construction industry's competitive bidding process and post-pandemic labour shortages.

In addition, construction companies may source materials from countries considered at a higher risk of modern slavery

#### Actions Taken

Property Services has a range of panels in place to provide access to pre-qualified suppliers for building services, construction, hazardous material removal and furniture supplies.

Centralised management of Property Services vendors and supplier panels includes the Builders Panel, in which members are prequalified for construction projects under \$5M, subject to demonstrated continual compliance with panel agreements including the upholding of labour standards and modern slavery risk minimisation.

Non-panel construction services are subject to tender and include a comprehensive CSR screening process and signing of the RMIT Supplier Code of Conduct as a requirement of the contract process. All tenders also have a weighting for sustainability, Indigenous and student engagement outcomes, and sustainability outcomes.

## Electronics and IT hardware (computers, audio-visual, etc.)

### Inherent modern slavery risks

The use of electronics is essential for students and staff during our everyday operations, including the use of computers, projectors, audio-visual equipment, and associated networking and peripheral devices on our campuses. Electronics and hardware have a high modern slavery risk, most prevalent in the raw material extraction that occurs to supply the electronics industry, including the mining of conflict minerals, where workers may be subject to dangerous and life-threatening working conditions.

The risk of modern slavery is also present during the manufacture of electronic goods in high-risk geographies, where forced labour or other modern slavery practices may be present.

### Actions Taken

The procurement process for electronics and IT hardware follows our organisation-wide due diligence procedures and screening for suppliers that may have indicators of higher modern slavery risk. The Agreements for the supply of IT and audio-visual hardware give RMIT the right to audit to ensure ethical employment and legislative rights are fully complied with, including labour standards and modern slavery obligations. The new agreements, set up in 2023, include comprehensive modern slavery coverage and supply chain reporting which will be finalised and implemented in 2024.

## IT development and hosting services

### Inherent modern slavery risks

As a technology-driven university, we continue to rely on hosted IT services, including learning and administrative platforms. As such services are often hosted and supported overseas, the risk of exploitation and mistreatment for offshore technology providers is present in these sectors, including IT development, hosting and support.

### Actions Taken

Acting on the modern slavery risk indicators present in IT development and hosting services, we prioritise using RMIT terms and conditions incorporating CSR and modern slavery standards in new and renewing IT suppliers. Where the vendor's terms and conditions are utilised instead, we require RMIT standards to be incorporated. Audit clauses are now incorporated in all new contracts. Since 2022, RMIT's core hosting arrangements have been via the Australian Government. Most IT development resources used by RMIT are now either internal teams or in Australia subject to compliance with Australian laws. Where offshore resources are utilised, the vendor is required to get RMIT pre-approval, keep records demonstrating compliance with Australia's modern slavery laws and notify RMIT within 10 days in the event of any actual, suspected or alleged breach.

## Laboratory supplies, office supplies and furniture

### Inherent modern slavery risks

In many areas of campus operations, we utilise products such as laboratory and classroom supplies (e.g. rubber gloves, chemicals, paper, and stationery) as well as equipment for ongoing use (e.g. tables, chairs, desks, and other furniture). The manufacturing of the associated input materials has a high risk of modern slavery as they may include forced labour, child labour and more broadly, instances of sub-standard and exploitative labour conditions, where informal and unregulated suppliers are common.

These risks may come from activities such as the harvesting of natural rubber for rubber glove production, and the cultivation of plants and timber used in furniture and paper processing.

### Actions Taken

All RMIT Lab Consumables Panel Agreements explicitly require that suppliers ensure their own suppliers also comply with the RMIT Supplier Code of Conduct, relevant human rights and modern slavery obligations. RMIT has the full right to access and audit operations and records to verify compliance. Any off-panel lab consumables purchases are subject to CSR due diligence per the supplier registration process. The procurement process to renew the Lab Consumables Panel commenced in 2023, seeking to establish a new panel arrangement in 2024 that will minimise off-panel lab consumables purchases and therefore suppliers at risk of contravening Australian modern slavery laws.

The RMIT Furniture Panel ensures that only furniture which complies with the RMIT Furniture Standards is supplied to the University. The Standard requires furniture to meet a range of sustainability rating/certification schemes, which take into account CSR, labour standards and modern slavery risk management. Where builders and architects propose alternative furniture not available from the RMIT Furniture Panel, the alternative furniture supply arrangements are also subject to the RMIT Furniture Standards.

RMIT has a single, whole-of-university supplier for office supplies and stationery to ensure products are ethically and sustainably sourced. The Agreement explicitly requires that as a Tier 1 supplier, their suppliers also comply with the RMIT Supplier Code of Conduct, relevant human rights and modern slavery obligations. RMIT has the full right to access and audit operations and records to verify compliance.

The existing centrally-managed agreements for printing services incorporate similar human rights and modern slavery risk management obligations.

## Clothing and merchandise

### Inherent modern slavery risks

The RMIT Store owned and operated by the University is responsible for providing a range of official branded clothing, accessories and course equipment which is sold online and on campus. Despite a small category of spend, the items sold remain highly visible and are produced by third-party clothing and textile manufacturers locally and offshore.

Some products sold through the RMIT Store may carry modern slavery risks due to the involvement of third-party sourcing of materials and manufacturing as well as the risk of practices such as unauthorised subcontracting.

### Actions Taken

The RMIT Store has continued to refine its supplier screening practices and onboarding requirements. Information and evidence is required beyond Tier 1 suppliers, including supplier audit reports and corrective action plans.

The ethical sourcing practices of the RMIT Store have been uniquely tailored to size, scale and types of goods sold in the Store and values of the University. These practices have been developed to mitigate against the risk of forced and slave labour of the goods sold and are in addition to the broader due diligence requirements embedded into standard procurement.

More broadly, sustainability outreach and engagement with students through key events such as Sustainability Week and Fashion Revolution speak to how students can buy ethically.



## Directly procured food and beverages (RMIT kitchens, tea points and meeting rooms)

### Inherent modern slavery risks

RMIT has kitchens, tea points and meeting rooms that provide beverage supplies such as tea, coffee, and sugar. Food procurement may present a risk of forced labour and instances of sub-standard and exploitative labour conditions in supply chains and during processing.

### Actions Taken

As a Fair Trade University since 2009, RMIT preferences Fairtrade certified products which maintain third-party certification providing for fair and equitable protection of food producers. This is in addition to our standard procurement due diligence processes. We continue to work with our stationery suppliers (who supply this category) to ensure we encourage local buyers across RMIT to select these products.

## On-campus retailers

### Inherent modern slavery risks

Retail and hospitality industry workers can be vulnerable to sub-standard working conditions and underpayment of wages, due to industry-specific factors driven by the casual and seasonal nature of this work. Certain goods, which may be sold by retailers, such as seafood, dried fruit and nuts, coffee, palm oil, cocoa, coconut, and rice are also at high risk of forced labour, human trafficking and debt bondage.

RMIT leases space to external vendors who operate on-site to sell food and beverages. These vendors are treated as RMIT tenants and therefore operate outside of our centralised procurement practices.

### Actions Taken

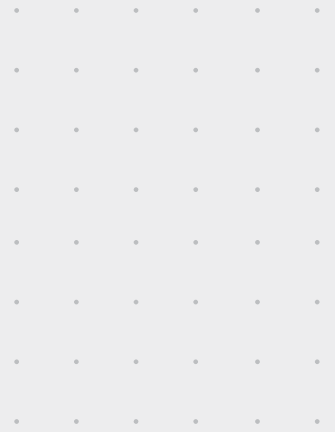
Contractual arrangements are in place with on-campus retailers via our Licence to Occupy agreement. The templates now refer to a general obligation for licensees to comply with all applicable laws and there is a specific schedule attached to our licenses which calls out compliance with the RMIT Supplier Code of Conduct, Sustainability Policy and sustainability commitments, including Fair Trade.

## Actions taken across other procurement categories

RMIT's Travel Management Services Agreement puts the onus on the supplier to be responsible for human rights compliance for itself, the supplier's personnel and the supplier's supply chain participants. They must notify RMIT promptly or within 10 days of becoming aware of any human rights breach and are obligated to cooperate and assist RMIT in any investigation or legal proceedings in relation to any actual, alleged or suspected breach. In 2023, vendors were required to complete and submit the CSR questionnaire to RMIT's satisfaction as a pre-requisite to participation in the Hotels Panel renewal process.

# Our Philanthropic Investments





## A tertiary education can transform lives, giving students the opportunity to access knowledge and pursue their passion.

**RMIT Philanthropy** connects our community of supporters – donors, staff, alumni, industry partners and students – with University initiatives they are passionate about, to deliver strategic funding and support that advances RMIT’s ambitions.

In 2023, 1,662 students were supported through scholarships, prizes and travel while \$100,000 of philanthropic funding was made available to support students experiencing hardship continue with their studies.

The RMIT Responsible Investment Principles guide the University’s investment managers to ensure the portfolio minimises activities that have a material impact on climate change, including involvement in fossil fuels, while screening for issues relating to public health and wellbeing.

As of 31 December 2023, RMIT held \$104.9M in philanthropic funds across a range of investments, including equities, bonds and cash. 100 per cent of the equity component of the RMIT philanthropic funds are invested in two responsible investment products with no material exposure to fossil fuels:

- **Russell Investments Sustainable Global Shares ex Fossil Fuels Fund:** a fund that invests in a broad range of global shares, with a 60% reduced exposure to carbon emissions compared to the MSCI ACWI ex Australia Index. Designed with Russell Investments’ robust decarbonisation strategy, the Fund uses a combination of carbon footprint, fossil fuel reserves, a proprietary green energy ratio and ESG scoring to determine the companies and their weighting within the Fund. The Fund excludes companies with fossil fuel reserves, as well as companies with significant involvement in fossil fuels. In addition to the decarbonisation strategy, other controversial industries are excluded including tobacco, cluster munitions, anti-personnel mines and nuclear weapons. The Fund’s portfolio is positively tilted towards companies with higher-than-average material ESG scores and will continue to evolve to reflect best practice in sustainable investing.
- **Russell Investments Australian Responsible Investment (RARI) ETF:** a fund that invests in Australian shares and trusts listed on the ASX that also excludes companies with fossil fuel reserves. The fund is weighted towards companies that demonstrate positive ESG characteristics after negatively screening for companies that have significant involvement in a range of activities including tobacco, gambling and controversial weapons. RARI has been certified by Responsible Investment Association Australasia (RIAA) to the strict operational and disclosure practices required under the Responsible Investment Certification Program.

Additionally, RMIT utilises a small component of its philanthropic funding to undertake 'impact investing' which is an investment designed to generate measurable, beneficial social or environmental impact alongside a financial return. Since 2019, RMIT has been working with Skalata Ventures, a not-for-profit organisation that runs an independently-funded seed program to scale and grow early-stage companies into significant and sustainable businesses. This fund

supports future pathways and seed investments for the start-up community, such as those which are developed through the **RMIT Activator program**.

For more information visit: **[rmit.edu.au/responsibleinvestment](https://rmit.edu.au/responsibleinvestment)**



## Inherent modern slavery risks

There is a level of risk of modern slavery within the underlying asset holdings of any investment product. The combined modern slavery risk profile across the underlying assets is complex, with many of these assets being exchange-listed companies with global operations and international, multi-tiered supply chains. Some of these companies are required to produce a modern slavery statement under the Act, with this level of reporting providing greater transparency of asset-level modern slavery risk programs to investors.

## Actions Taken

The University invests through a 'pooled funds' structure, where investments are not directly held by RMIT. Pooled funds are those where there are several different types of investors whose money is 'pooled' and invested together.

The use of pooled funds means that direct investment decisions, such as whether to buy shares in an individual company are not made by the University. Instead, RMIT works with an asset consultant to set parameters on the Environmental, Social and Governance (ESG) impacts of its investments. The asset consultant then assists the University in finding suitable investment products that best match the University's ESG parameters.

The RMIT Responsible Investment Principles guide our investment managers, to ensure that our portfolio minimises activities that have a material impact on climate change, including involvement in fossil fuels, while screening for issues relating to public health and wellbeing, including human rights and modern slavery. We monitor the portfolio in relation to globally accepted norms on corporate sustainability behaviours to ensure we meet our commitments to the UN Global Compact.

RMIT also requires our investment managers to be a signatory to the UN Principles for Responsible Investment (PRI). PRI is the world's leading proponent of responsible investment. The PRI works with its international network of signatories to put the six Principles for Responsible Investment into practice. Its goals are to understand the investment implications of ESG issues and to support signatories in integrating these issues into investment and ownership decisions.

RMIT's external investment managers, Russell Investment Management Ltd are subject to the requirements of the *Modern Slavery Act 2018* (Cth). They publish an annual Modern Slavery Statement on [their website](#).

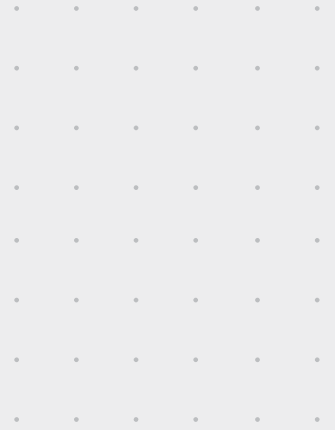
In assessing the risk Modern Slavery in their Australian business, they have divided their supply chain into two groups:

- 1. Investments Supply Chain:** businesses that support their investment solutions business:
  - Modern Slavery risk has been specifically added to the initial due diligence information-gathering process undertaken by a dedicated due diligence team in respect of the Russell Investments Australia Funds. Additionally, quarterly risk management questionnaires, which are completed by all money managers who manage the Russell Investments Australia Funds, now contain specific questions about the risk of modern slavery within the money manager's business and supply chain.
  - Russell Investments has been a member of Investors Against Slavery and Trafficking (IAST) APAC since 2022. Membership improves their knowledge of incidences of modern slavery within their investment supply chain and assists them to more effectively engage with investee companies to identify and address potential Modern Slavery issues.
- 2. Operations Supply Chain:** businesses that support the day-to-day running:
  - modern slavery risk has also been included in periodic meetings with certain suppliers in their Operations Supply Chain. Further opportunities for engagement in this area will continue to be explored.

The University requires an update from its investment managers on what actions have been taken to address modern slavery as part of their standard reporting to the RMIT Investment Committee.

# Grievance reporting and remediation





**RMIT’s Whistleblower Procedure is the primary mechanism for anyone wishing to report concerns they may have about illegal, unethical or improper conduct involving RMIT or its staff, Council members, students or researchers, while protecting the person making the report. We continue to operate an externally managed whistleblower hotline, via our third-party vendor Stopline.**

Modern slavery was added as a category in the overall RMIT Group Complaints report in 2023. Any allegations or **complaints** of modern slavery would be highlighted in the report to the Audit and Risk Management Committee (ARMC) of the RMIT Council on a quarterly basis.

In 2023, we did not receive any whistleblowing allegations or complaints that alleged breaches of the Modern Slavery Act. We acknowledge this does not necessarily indicate that no modern slavery occurred during this period and we remain committed to ensuring our whistleblowing mechanisms are trusted and accessible to our stakeholder groups.

Throughout 2023, the Central Complaints and Investigations Team worked to build and design a new centralised digital complaints management system, which will launch in June 2024. Part of the new system rollout will be a global, public-facing complaints portal, where anyone can anonymously lodge a complaint regarding allegations of modern slavery breaches.

Safer Community is our dedicated service for students and staff to report unwanted or threatening behaviour, including whether they are experiencing, or know someone who is experiencing substandard treatment.

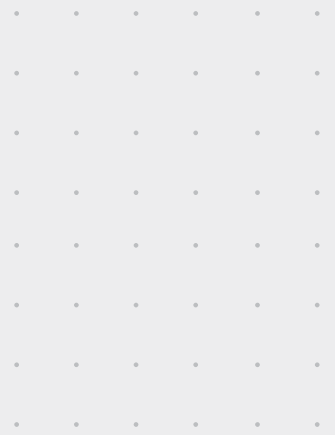
Within the RMIT Modern Slavery Roadmap, an action has been identified to develop a response and remediation protocol that will enable an effective response to identified modern slavery issues. At present, any such instances would be responded to in accordance with our existing policies and procedures.



# Our Impact







Since its founding, RMIT has been an active and influential member of civil society, working to build trust and create shared benefits in the communities where we operate. To meet future challenges and shape the world, RMIT expects all graduates to demonstrate a wide range of practical skills and expertise whatever their program of study, including being ethical global citizens. RMIT's collaborative approach to research means we work together with our partners to develop and apply knowledge to shape a better world. It is with this lens of learning, teaching, research and partnership that RMIT can have the greatest impact in helping to address global challenges such as human rights and modern slavery.

One such example of the positive impact the University can have through research and industry outreach is the RMIT **Business and Human Rights Centre (BHRIGHT)**. Located in the College of Business and Law, the Centre addresses the human rights impact of business through research, education, innovation and collaboration. BHRIGHT is the first centre for business and human rights in Australia, running masterclasses, consultancies and design labs to generate and share innovation and train current and future leaders to develop and integrate human rights standards in their respective industry contexts.

BHRIGHT amplifies the voices of affected communities and workers through a range of conceptual frameworks and methods to develop solutions for a future that is fairer, more equitable and sustainable.

Examples of work from BHRIGHT in 2023 include:

- In August 2023, BHRIGHT launched an important new report, **“Where’s the Beef”**. The report was launched at a webinar with Patricia Fernandez, Secretary/Treasurer for the **Australasian Meat Industry Employees’ Union**, Professor Shelley Marshall and Distinguished Professor Anthony Forsyth of RMIT. During the worst of the COVID-19

pandemic, BHRIGHT repeatedly reported how meat processing plants acted as **incubators of covid, exposing the poor working conditions across many plants**. In the preceding years, the Fair Work Ombudsman’s Baiada Inquiry, as well as ABC’s Lateline and Four Corners, uncovered the shocking conditions of workers brought from Asia and Pacific Islands to work in abattoirs on temporary visas. Isolated, underpaid, forced to work extremely long hours and required to pay high rents for overcrowded and unsafe employee accommodation, their conditions meet the definition of modern slavery. Despite having been alerted to these high modern slavery risks in Australia, the ‘Where’s the Beef’ report finds that the big sellers of meat to Australian consumers are paying inadequate attention to modern slavery risks and are failing to take the steps required to improve the working conditions of vulnerable, migrant workers. Since the report’s launch there has been significant engagement from industry and government, with a number of retailers and consultancies that work with retailers and government officials at the briefing.

- Also in August was the Global Compact Network Australia Annual Dialogue on Business and Human Rights, hosted by Corrs Chambers Westgarth. The event brought together representatives from Australian business, government, civil society, academia and the investor community to discuss emerging risks and opportunities and explore ways to collaborate on the continued implementation of the UN Guiding Principles on Business and Human Rights (UNGPs) and the UN Global Compact Ten Principles. Two BHRIGHT members, Director Jonathan Kolieb and Professor Shelley Marshall participated in “The Great Debate” pondering whether Australia should enact a mandatory human rights due diligence law.

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The Modern Slavery Act sets out seven mandatory criteria for the content of statements:

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	Our People	18
	Our Supply Chain	22
<b>Description of the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.</b>	Our People	18
	Our Supply Chain	22
	Our Philanthropic Investments	32
<b>Description of the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.</b>	Our Compliance Landscape	12
	Our People	18
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	Grievance reporting and remediation	36
<b>Description of how the reporting entity assesses the effectiveness of such actions.</b>	Throughout	–
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