

Bond University Modern Slavery Act Statement

2025

Bond University
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Australia

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Our commitment to Australian Aboriginal and Torres Strait Islander people

Bond University acknowledges the people of the Yugambeh language, upon whose ancestral lands our University now stands, and celebrates the contribution that Aboriginal and Torres Strait Islander people make to our institution.

Bond University has a long-standing and deeply embedded commitment to building strong relationships with the Aboriginal and Torres Strait Islander communities, with the primary goal of improving educational opportunities and providing culturally safe and supportive learning environments for our Indigenous students.



Introduction

Modern slavery remains a pervasive and deeply entrenched global challenge, encompassing practices such as forced labour, forced marriage, human trafficking, debt bondage, domestic servitude, and the worst forms of child labour. These forms of exploitation rely on coercion, deception, and abuse of power, systematically denying individuals their freedom, fundamental rights, and human dignity. Alarming, modern slavery is often concealed within global supply chains and everyday services, making it difficult to detect and allowing exploitation to persist largely unseen.

Australia continues to be recognised internationally for its legislative and policy response to modern slavery. The 2023-2024 Global Slavery Index ranked Australia as having the equal second-strongest government response globally, reflective of measures such as the Modern Slavery Act 2018 (Cth), strong criminal justice frameworks, and growing institutional accountability. Despite this, modern slavery persists domestically. Walk Free estimates that approximately 41,000 people in Australia were living in modern slavery, equating to 1.6 victims for every thousand people in the country.

Bond University remains steadfast in its commitment to combating modern slavery and respecting human rights. We are dedicated to safeguarding the wellbeing of all individuals within our operations and supply chains, including our staff, students, contractors, and suppliers. Through robust governance, responsible procurement practices, and collaboration with sector peers—particularly via the Australasian University Procurement Network (AUPN)—Bond University actively works to assess, mitigate, and address modern slavery risks.

This Modern Slavery Statement is presented for the reporting period 1 January to 31 December 2025. Prepared in accordance with the Modern Slavery Act 2018 (Cth) and aligned to Bond University's financial reporting cycle, the statement reflects our ongoing commitment to ethical conduct, transparency, and continuous improvement in preventing modern slavery within our operations and supply chains.



Part A – Reporting entity (Criterion 1)

Bond University was founded in 1989 as Australia's first private, not-for-profit university and, in 2025, was named Australia's top university for teaching in the Australian Financial Review (AFR) Best Universities Ranking. In the same year, the University on average, enrolled 4,543 students each semester, employed 1,520 staff each month, and generated an annual turnover of circa \$277 million.

The Modern Slavery Act's reporting requirement applies to large businesses and other entities in the Australian market with annual consolidated revenues of at least AUD \$100 million.

ABN: 88 010 694 121

Registered Address: 14 University Drive,
Bond University,
QLD 4229



Part B – Structure, operations, and supply chains (Criterion 2)

Structure

Bond University Limited is incorporated as a company limited by guarantee. Pursuant to the constitution of the company, the Membership of Bond University Limited comprises 30 members, drawn from alumni, staff, students and the external community.

The University has three campuses located in Australia. The University's controlled entities under 100% ownership are:

- Campus Operations Pty Ltd
- Lashkar Pty Ltd
- Bond Law Clinic Pty Ltd

Campus Operations Pty Ltd operates student accommodation including food and beverage facilities. Lashkar Pty Ltd holds and manages properties for the University, including the Bond Institute of Health and Sport buildings located in Robina, Queensland. Bond Law Clinic Pty Ltd operates as a free legal service dedicated to empowering the community with access to justice and vital legal assistance, while allowing students to prepare for a career in law by assisting our qualified professionals with real legal matters.

Risk assessment, reporting and data presented within this statement is for the consolidated group.

For the purposes of the Modern Slavery Act, the Bond University Council is the principle governing body operating as the Board of Bond University Limited. Comprising 10 councillors, the Bond University Council is accountable to university stakeholders and the wider community to ensure the University is managed prudently, efficiently, and in compliance with all relevant regulations. Council leads the University's community of students, staff and others to meet and advance the University's goals and objectives. Excluding the Vice Chancellor, all Councillors are non-executive and are elected based on the skills and experience they bring to the Council. Bond's Constitution provides for the rotation of Councillors, whereby no Councillor may serve for more than the maximum term allowed under the Constitution being eight years.

The University is organised into five academic groups being:

- Bond Business School
- Faculty of Health Science and Medicine
- Faculty of Society and Design
- Faculty of Law
- Transformation CoLab

A comprehensive array of professional administration services supports the University's students, staff and teaching, learning and research activities.

Operations

As Australia's first private not-for-profit university, Bond University seeks to be recognised internationally as a leading independent university, imbued with a spirit to innovate, a commitment to influence and a dedication to inspire tomorrow's professionals who share a personalised and transformational student experience. As a not-for-profit entity, the institution reinvests its surplus from operations back into the University.

In 2025, the University launched its new brand campaign, "Ambition Loves Company," celebrating the strength of its community and the collective drive of its members. Furthermore, the University broke ground on a major development of The Connections Precinct. Designed to unite the Medicine and Business programs in response to significant growth in Medicine, the precinct will feature a new anatomy laboratory double the size of the current facility, along with 33 new clinical skills rooms.

In 2025 operations are summarised as below

- Revenue - \$277 million
 - \$243 million Student Tuition and Research income
 - \$9.5 million Student services/Amenities/Accommodation
 - \$8.8 million Food and Beverages
 - \$8.3 million Investment Income
 - \$3.4 million Donations/prizes
 - \$1 million Consultancy
 - \$3 million Other Operational
- Expenditure - \$249 million
 - \$177 million Employee Expenditure
 - \$72 million Other Operational Expenditure
- Property, Plant and Equipment (Excluding Land) - \$40 million

Teaching delivery occurs across three campus locations consisting of the main campus on the Gold Coast, an institute specialising in Allied Health within proximity of Robina Hospital, and a Brisbane site focused on postgraduate and executive education. Almost 100% of tuition revenue generated requires in-person, face to face delivery at these campus locations with online material being supplemental only. Bond University manages and owns all food and beverage outlets and accommodation facilities on campus.

Supply Chains

Supporting the operations of the University requires the purchase of a diverse range of goods and services from a wide range of suppliers across multiple categories, including staffing. The University is committed to responsible procurement practices, proactively supporting local and First Nations suppliers where possible and leveraging its operations and supply chains to deliver positive outcomes

Procurement Supply chains (excluding salaried staff)

The University has made a considerable investment in collaborating with the Australasian Universities Procurement Network (AUPN) to ensure its spend categories align with their uniform reporting taxonomy. Through sharing data, the AUPN facilitates aggregated spend analysis, bench marking, reporting and transparency across the Higher Education sector, including through the implementation of a supplier risk portal.

At the highest level four categories have been derived from a granular level consisting of a detailed mapping exercise of more than 300 base level categories.

1. ***Property and Facilities*** - Maintenance and construction of buildings and facilities - All university facilities and buildings are located on the Gold Coast and Brisbane.
2. ***Research and Teaching*** - Procurement to support delivery of innovative and responsive teaching and learning including student placements, library/laboratory services and direct teaching expenses.
3. ***Business Services*** - Professional services such audit and insurance, marketing and media, travel, office related supplies, storage and logistics.
4. ***Technology*** - Environments with the increasing use of technology and online platforms including expenditure on IT hardware, audio visual, software and telecommunications.

The Australian university sector spend in 2025 was approximately \$14 billion across 186,000 unique suppliers. Bond University procurement spend (operational expenditure and asset purchases excluding land purchases and financing costs) was \$100 million across 1,600 unique suppliers.



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Part C – Risks of modern slavery practices in operations and supply chains of the University and subsidiaries (Criterion 3)

Risks in Operations

Bond's primary source of revenue is tuition, and its principal input in delivering this activity is staff salaries. Comprising 71% of operational expenditure and engaging approximately 1,500 staff, predominantly domiciled in Australia, salaries are Bond's single largest expenditure item. The Bond University Act 1987 makes provision for two staff associations. Professional staff are engaged under a Collective Agreement in the Federal jurisdiction and a negotiated agreement (MOU) between the University and Staff Association. Academic staff are covered by a Federal Award and a negotiated MOU.

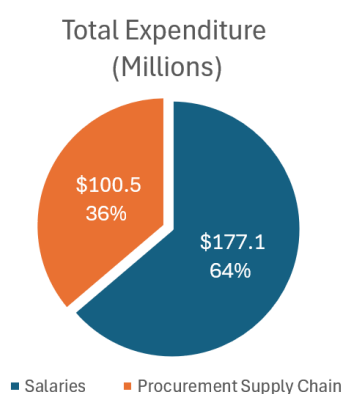
Location of employees in 2025

NSW	QLD	SA	VIC	OVERSEAS	TOTAL
2	1,512	1	1	2	1,520

With operations based primarily in Australia, auxiliary services including accommodation and food and beverage delivered in house, and a highly educated workforce engaged under applicable Awards, Collective Agreements and MOUs administered by a central HR team the University assesses its modern slavery risk as low. Only a small proportion of services, such as cleaning and security are outsourced, and these are provided by reputable suppliers that also report on Modern Slavery.

Risks in Subsidiaries

The University's subsidiary entities, Campus Operations Pty Ltd, Lashkar Pty Ltd and Bond Law Clinic Pty Ltd, are 100% owned and managed by Bond University Ltd. This statement is for the consolidated group.



Risks in our Supply Chain



~\$100 million



1,600 Suppliers



40+ Countries

There are greater risks within the University's supply chain compared to operations given the diverse range of products and services procured. Bond University's Modern Slavery Framework identifies three primary risk factors (Country, Category and Spend) that have and will continue to apply to our risk methodology and our overall supplier risk rating. This framework assists in developing a more targeted and impactful strategy to combat human rights violations.

Country Risk - Level of risk or vulnerability that a country exhibits concerning the prevalence and enforcement of laws related to modern slavery. The Global Slavery Index (GSI) ([Walkfree Org](https://www.walkfree.org/)) is a tool that assesses and ranks countries based on their efforts to address modern slavery and the prevalence of modern slavery within their borders. Total Vulnerability rating is weighted at: Low 0-25, Medium 25-50, High 50-75, Very High 75-100.

Over 98% of Bond's expenditure is directed to low-risk countries. The table below summarises our supply chain expenditure based on the head office location of the supplier. One high-risk country identified below is the Solomon Islands, this expenditure relates exclusively to Bond's final-year medical students undertaking six week clinical internship at Gizo Provincial Hospital and Helena Goldie Hospital in Munda, Western Province. As this spend is limited to supervised clinical education delivered through established public health institutions, Bond University does not identify any modern slavery risk associated with this expenditure.

Country	Global Slavery Index rating*	Expenditure	%
Australia	Low	93,136,366	92%
United States of America	Low	1,644,169	2%
Ireland	Low	1,198,407	1%
Netherlands Antilles	Low	950,052	1%
United Kingdom	Low	744,772	1%
Canada	Low	653,810	1%
Solomon Islands	High	379,147	0%
Germany	Low	327,704	0%
China	Medium	290,870	0%
Denmark	Low	236,657	0%
Other (31 Countries)		1,425,407	1%
Total		100,987,360	100%

Category Risk - Level of risk associated with specific categories or sectors where modern slavery is prevalent or has a higher likelihood of occurrence. Each of the more than 300 base level expenditure categories have been assigned a low, medium, or high rating. Risk ratings have been developed in conjunction with the AUPN using sources including the Global Slavery Index, The Responsible and Ethical Private Sector Coalition against Trafficking ([RESPECT](#)) and the NSW Anti-Slavery Commissioner [GRS Inherent Risk Identification Tool](#) and industry consulting specialist ArcBlue.

The University's spend breakdown per category in 2025 was as follows.

Category	Low	Medium	High	Total	% of total procurement spend
Infrastructure			35,811,297	35,811,297	35%
Marketing & Events	75,786	8,181,236	5,555,480	13,812,502	14%
Facilities Maintenance	304,237	1,359,239	7,480,336	9,143,812	9%
IT Services			7,231,987	7,231,987	7%
Student Services	980,943	5,234,959		6,215,902	6%
Corporate Services	2,113,731	5,341	2,734,981	4,854,053	5%
Library Services		3,341,462	438,134	3,779,596	4%
Contracted Services/Advice	2,862,018		973,566	3,835,585	4%
Energy & Utilities		2,250,596		2,250,596	2%
IT Hardware			3,029,407	3,029,407	3%
Other	759,717	3,030,806	7,232,102	11,022,625	11%

Spend Risk - Level of risk weighted per supplier at Low for \$0-10,000, Medium \$10,000-50,000, High \$50,000-100,000, Very High >\$100,000.

Spend Risk	Number of Suppliers	%
Low: \$0-10,000	956	60%
Medium: \$10,000-50,000	409	26%
High: \$50,000-100,000	106	7%
Very High: >\$100,000	128	8%
Total	1,599	100%

Overall Procurement Supply Chain Risk Rating - The risk ratings for country, category, and spend are consolidated into overall risk rating with category having a significant higher weighting. Overall Risk Rating = (Category*5) x Country Risk x Spend Risk.

Based on this analysis, approximately 70% of the University's procurement spend for the reporting period was assessed as 'high' risk, representing the second-highest risk rating. This outcome is primarily attributable to significant expenditure incurred during the year to support the development of the University's new Connections Precinct building. The construction sector is recognised as having an elevated inherent risk of modern slavery and as a result, expenditure within this category attracts a higher category risk rating. In addition, the scale and value of the investment resulted in an increased spend risk, further contributing to the overall risk assessment.

While the risk rating reflects the value and nature of this spend rather than the identification of actual modern slavery incidents, it highlights the importance of proactive risk management. The University continues to apply enhanced due diligence and supplier engagement measures for high-risk categories to mitigate potential modern slavery risks within its supply chains.

Overall Procurement Supply Chain Risk Rating

Risk Rating	Expenditure	%
Very High	824,549	1%
High	70,434,621	70%
Medium	676,453	1%
Low	29,051,737	29%
Total	100,987,360	100%

Part D – Actions taken to assess and address risks (Criterion 4)

Bond University undertakes the following actions to assess and address modern slavery risks in our operations and supply chain.

Collaboration with AUPN

Bond University is a member of the Australasian Universities Procurement Network (AUPN), a collaborative group comprising 41 Universities, and the Modern Slavery Working Group (MSWG). All AUPN member universities actively contribute resources and data in relation to Modern Slavery and leverages our collective spend and market influence as well as expertise to maximise purchasing power, drive ethical procurement, and ensure compliance with the Modern Slavery Act 2018 (Cth).

High Risk Rating Reviews

During the reporting period, Bond University commenced a major construction project of the Connections Precinct that accounted for approximately 30% of total University procurement expenditure. The project is undertaken by ADCO Construction, a nationally recognised construction company whom the University has maintained a trusted relationship of more than 20 years which provides a strong foundation for managing modern slavery risks. Over the course of this partnership, ADCO has consistently demonstrated strong governance frameworks, ethical leadership, transparency in operations and a clear commitment to meeting modern slavery obligations. These factors were central to the University's assessment of modern slavery risk .

Modern slavery considerations were incorporated into the University's engagement with ADCO through:

- Confidence on ADCO's established policies, controls and processes addressing ethical labour practices and supply chain risk;
- Ongoing oversight arrangements aligned with the scale and risk profile of the project; and
- Contractual expectations that reinforce compliance with modern slavery legislation and responsible sourcing practices.

While construction remains classified as a high risk category due to inherent sector risk, Bond University is satisfied that the engagement of ADCO, combined with the University's due diligence and contract management processes, provides an appropriate and proportionate response to mitigating modern slavery risks associated with the project.

Within the same period, the University also appointed a new campus cleaning service provider. As the facilities management services are recognised as a higher risk for modern slavery, this change was identified as a key opportunity to strengthen our risk management controls. As part of the procurement and contracting process, we ensured modern slavery clauses were present within the agreement. These clauses require the supplier to comply with applicable modern slavery laws, uphold ethical labour practices, and maintain transparency within their operations and supply chains.

This approach reflects Bond University's commitment to proactively assessing and addressing modern slavery risks in high risk industries through contractual safeguards and responsible supplier engagement.

Training and Education

Bond University recognises that effective training and education are critical to building organisational capability to identify, assess and respond to modern slavery risks. During the reporting period, the University continued to promote awareness and understanding of modern slavery across its staff, students and broader stakeholder community through a range of awareness raising and educational activities.

The University adopted a broad approach to modern slavery awareness by integrating key concepts into structured staff and student engagement initiatives, academic output and external communications. Bond academics have actively contributed informed commentary and analysis on modern slavery issues through articles and publications distributed to the wider community and external media channels. These communications addressed contemporary modern slavery risks, ethical supply chain considerations and responsible business practices, and were intended to promote informed public discussion.

Modern slavery education was also incorporated within University wide sustainability and engagement initiatives with interactive learning activities designed to encourage critical thinking and practical understanding of exploitation risks were made available to staff and

students during campus events, reinforcing the relevance of modern slavery issues within everyday organisational and personal decision making.

Bond academics continued to support sector and industry by contributing to conferences, forums and professional discussions that addressed sustainability and ethical risk management, including modern slavery risks within complex supply chains such as the defence force. These activities helped position modern slavery as a key component of broader sustainability and governance conversations across multiple industries.

In addition, modern slavery continues to be embedded within the University's academic curriculum. Relevant subjects within our Business programs incorporate learning modules and case studies.

Guiding Policies and Procedures

Bond University has developed and maintains the policies listed below, which assist in addressing overarching risks of modern slavery within our operations and supply chains. Procurement guides for tendering incorporate specific assessment of modern slavery.

- Ethical Conduct
- Code of Conduct
- Conduct for Working with Children and Young Persons
- Public Interest Disclosure
- Sexual Exploitation, Abuse, Assault and Harassment
- Human Research Ethics
- Bullying and Harassment
- Workplace Health and Safety
- Procurement
- Student Regulation and Code of Conduct

Part E – Assessment of the effectiveness of actions (Criterion 5)

Bond University is committed to enhancing our processes to tackle the challenging and complex issue of modern slavery. Monitoring and reviewing the progress of our initiatives to eradicate modern slavery from our operations and supply chains is crucial for improving our approach over time and addressing emerging issues. In pursuit of this goal, evaluation of our approach throughout 2025 against our Action Pillars are summarised below.

Action Pillar	Effectiveness
Understand the Legislation	During the reporting period, Bond University maintained oversight of developments relating to the Modern Slavery Act 2018 (Cth), including the Australian Government's consultation on proposed reforms following the statutory review in 2025. Although no substantive legislative amendments took effect, ongoing monitoring supported continued compliance with current obligations and informed internal discussions on governance, reporting and due diligence practices, ensuring the University remains well positioned to respond to future legislative change.
Engage with Industry Experts	Continuing engagement with established sector bodies and specialist advisors, including AUPN, ArcBlue and the University Procurement Hub (UPH). These engagements strengthened access to expert advice, enhanced procurement and supply chain insight through shared data and analytics, and supported collaboration with peer institutions. Collectively, these relationships contributed to improved understanding of modern slavery risks and opportunities to influence supplier practices at a sector level.
Procurement Process & Policies	Our procurement and tender guidelines incorporate specific assessment when conducting new tenders to ensure compliance with the Act.
Ongoing Supplier Analysis	Participation within AUPN supports continued professional development and enables ongoing engagement with evolving best practices in modern slavery risk management. Attendance at monthly forums, together with access to newsletters and university case study presentations, supports awareness of emerging risks, sector wide challenges and practical approaches to supplier assessment. These activities inform procurement practices and contribute to a consistent and informed approach to identifying and managing modern slavery risks across supply chains.

Part F – Consultation (Criterion 6)

The University's subsidiary entities, Campus Operations Pty Ltd, Lashkar Pty Ltd, and Bond Law Clinic Pty Ltd, are 100% owned by Bond University Limited and management across the three entities are consistent. The risk assessment, reporting and data for this statement is for the consolidated group.



Part G – Other information and conclusion (Criterion 7)

Bond University acknowledges the meaningful progress made in its efforts to address modern slavery and remains committed to strengthening its impact beyond supply chain activities. Through collaboration with academic, industry, and government stakeholders, we seek to contribute to coordinated and system wide responses. As part of our continuous improvement, we are focused on several key areas:

1. **Strengthening Supplier Assurance:** Developing a deeper understanding of supply chain structures and risk dynamics. This includes strengthening approaches to identifying and mitigating modern slavery risks through targeted supplier engagement and collaboration. Key initiatives we will explore include partnerships with global organisations such as Electronics Watch, which provides independent monitoring and remediation support within electronics supply chains, supporting greater transparency and accountability in higher risk procurement categories.
2. **Expanding Education and Awareness:** As an education institution, our operations and supply chains are significant. Increasing awareness across our community—including students, staff, suppliers, and contractors is central to our strategy. In 2026, this continues to include:
 - Sharing academic research with industry partners to support better risk understanding and prevention.
 - Introducing tailored initiatives for international students engaged in part-time employment to strengthen awareness of workplace rights and vulnerabilities. This includes participation in coordinated sector wide initiatives led through AUPN during 2024-25 to build evidence and improve national responses to modern slavery risks affecting international students. Activities included involvement in the International Student Risk Roundtable and collective participation in the National Temporary Migrant Survey, which expanded the sector's evidence base and deepened understanding of risks across the student lifecycle. These initiatives have supported the development of sector wide guidance for universities, scheduled for completion in 2026, and

reinforced the shared responsibility of universities in protecting international students.

- Leveraging external partnership expertise, through the rollout of ACRATH's Educating for Change micro-credential. This initiative has provided accessible, structured training to students and staff, strengthened understanding of modern slavery indicators and response pathways, and increased capability to identify and respond to risks.
- Continuing to enhance training and support tools for staff involved in assessing and responding to modern slavery

3. **Refining Policies and Governance:** We are conducting regular reviews of university policies and procedures to align with best practices and evolving regulatory requirements, ensuring a robust governance framework.

Bond University will continue to strengthen its approach, building on existing progress and working collaboratively with sector partners and stakeholders to address modern slavery risks effectively and responsibly.

Signed

A handwritten signature in black ink, reading "Tim Brailsford". The signature is written in a cursive, flowing style.

Professor Tim Brailsford

Vice Chancellor and President

This statement was approved by the council of Bond University Ltd.



BOND
UNIVERSITY

SPORTS