

UWA Modern Slavery Statement 2025

ABN 37 882 817 280



THE UNIVERSITY OF
**WESTERN
AUSTRALIA**

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Introduction

Acknowledgement of Country

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

From the Vice-Chancellor

At The University of Western Australia (UWA), we remain committed to upholding ethical standards, including addressing the risks of modern slavery across our operations and supply chains. As a leading university dedicated to world-class education, research, and community engagement, we continue to recognise our responsibility to contribute to a just and equitable society.

Modern slavery undermines human rights and the prosperity of our communities. As an organisation that fosters critical thinking and innovation, we are committed to using our research and professional expertise to develop our understanding of this complex issue. Through collaboration across the Australian higher education landscape and with other like-minded organisations, we aim to strengthen efforts to prevent and mitigate the risks of modern slavery.

UWA continues to refine our policies and practices to ensure transparency and accountability in our supply chains and operations. Through communications, education, research, and engagement, we seek to empower our students, staff, and wider networks to increase awareness and work to mitigate the risks of modern slavery.

2026 is a landmark year for UWA as we expand our operations into India with the establishment of our new campuses in Chennai and Mumbai, aiming to deepen educational and economic relationships, create new research and industry partnerships, and foster opportunities for collaboration that benefit both regions. UWA acknowledges the global reach and impact of this initiative in relation to modern slavery.

UWA's Modern Slavery Statement provides details of our approach to managing modern slavery risk in our operations and supply chain in accordance with the Modern Slavery Act 2018 (Cth).

The 2025 Modern Slavery Statement is made on behalf of The University of Western Australia and its controlled entities for the calendar year ended 31 December 2025 and was approved by the Senate of the University on 17 March 2026.

Professor Amit Chakma
Vice-Chancellor

Executive Summary

The University of Western Australia (UWA) is committed to its responsibility to staff, students, suppliers and community to ensure that modern slavery risks are identified and addressed across operations and supply chains. In accordance with the Modern Slavery Act 2018 (Cth), this Modern Slavery Statement reflects that commitment and reports on the steps undertaken to identify, assess and address the risks of modern slavery in operations and supply chain for the period 1 January 2025 to 31 December 2025 and future commitments in relation to mitigating modern slavery risks.

During 2025 UWA's modern slavery mitigation efforts focused on reviewing the effectiveness of our actions by conducting an independent review of our approach, carrying out a detailed risk assessment involving all key stakeholders, finalising the Modern Slavery Plan for 2026–27 and delivering against the commitments made in the 2024 Modern Slavery Statement. 2025 was a productive year for modern slavery risk mitigation at UWA, marked by a considerable strengthening of our approach. In addition to carrying out a detailed spend categorisation exercise to increase supply chain visibility, UWA sourced a training module, extended supplier due diligence, implemented a standard approach to procurement contract approvals that incorporates modern slavery risk assessment, developed a Supplier Code of Conduct, updated website resources, delivered education and resources to students throughout the year, in addition to continuing to explore ways to advance modern slavery mitigation and expand related engagement and collaborations.

For 2026, mitigation efforts will focus on developing UWA specific modern slavery training for staff, continuing to improve our spend analysis, developing a Modern Slavery Policy, implementing the Supplier Code of Conduct, plus continuing to expand our mitigations related to research, international students and controlled entities.

The risk of modern slavery within UWA's operations and supply chains remains low, due to strong compliance with legislative and policy frameworks and the predominance of Australian-based suppliers, but the University remains committed to continually strengthening its policies, practices, and culture to further mitigate modern slavery risks. UWA recognises that its operations may be subject to the risk of modern slavery, particularly in relation to current and future students, staff and investments and acknowledges the work yet to be done to fully mitigate these risks and to remediate any occurrences of modern slavery should they be identified.

UWA continues to be an active member of the Australian Universities Procurement Network (AUPN) and its Anti-Slavery Program that supports compliance with the Modern Slavery Act 2018 (Cth) while reducing duplication and has an established Modern Slavery Research Cluster which brings together interdisciplinary researchers and students from across UWA and our partners to contribute to tackling Modern Slavery.

About The University of Western Australia

GOVERNANCE

Established pursuant to the University of Western Australia Act 1911 as Western Australia's first university and founded with a mission to 'advance the prosperity and welfare of our communities'. The University of Western Australia (ABN 37 882 817 280) is a statutory corporation. The principal address is 35 Stirling Highway, Crawley, WA 6009. UWA is registered with the Australian Charities and Not-For-Profits Commission. UWA's CRICOS (Commonwealth Register of Institutions and Courses for Overseas Students) number is 00126G.

Senate

The *University of Western Australia Act 1911 (WA)* gives the Senate powers to act in the interests of UWA through the making of statutes, regulations, and by-laws and through the management of income and expenditure. It provides powers of delegation for the Senate, so that day-to-day management can be delegated to officers employed by UWA. The University is responsible to the State Minister for Education for the proper conduct of its business under the State legislation, and to the Commonwealth Minister for Education for the delivery of our teaching and research programs, and for the provision of adequate infrastructure to support those programs. The Senate consists of 17 members. The powers of the Senate are defined by the Senate Charter, and the Senate Code outlines the legal responsibilities, accountabilities and liabilities of each member of the Senate and details the standards and conduct to be adhered to by those members.

Executive

The Senate appoints the Vice-Chancellor and works in partnership with the incumbent to maximise UWA's capacity and performance, and to ensure fiscal viability. The Vice-Chancellor has delegated operational responsibility of UWA. The Vice-Chancellor appoints an executive group to assist with responsibilities for the academic, financial, administrative and other business of UWA.

Members of the Executive: Vice Chancellor, Senior Deputy Vice-Chancellor, Deputy Vice-Chancellor (Education and Student Experience), Deputy Vice-Chancellor (Research), Deputy Vice-Chancellor (Operations) and the Chief Financial Officer.



PEOPLE

Students

24,585 Total equivalent full-time student load *

9,324 International

125 Countries

*Headcount 31,460

Staff

3,596 Full-time equivalent*

1,487 Academic

2,109 Professional

*Headcount 4,183 (1,812 Academic; 2,371 Professional)

OPERATIONS

Education, Research and Partnerships

Responsibility for the quality and delivery of education at UWA primarily lies within the schools. The 21 Schools design and deliver over 346 courses and 3,941 units (excluding research units) and are accountable for quality of teaching and student satisfaction with their educational experience. The Deputy Vice-Chancellor (Education and Student Experience) leads UWA's academic programs and education mission.

Responsibility for the quality and delivery of research at UWA lies within the schools, institutes and centres with their collaborative and multidisciplinary research teams that resolve real world challenges. The Deputy Vice-Chancellor (Research) leads UWA's research mission and programs.

UWA's commitment to the wider community is embodied through support for a wide range of initiatives across the arts, culture, sport, education and philanthropy.

The Vice-Chancellor leads the University's global partnership engagement, supported by the Pro-Vice Chancellor (Global Engagement).

Campuses

UWA has three key teaching and research locations in addition to other metro and regional sites:

- Perth Campus (main campus)
- UWA Health Campus at the Queen Elizabeth II Medical Centre
- UWA Albany Campus

UWA's estate extends over 440,000 square meters (gross floor area) across 27 metropolitan and regional sites. Near our Crawley campus, we have two student residences University Hall (765 rooms) and Forrest Hall (43 apartments for Forrest Research Foundation Scholars and Fellows) and over 200 houses and apartments in Crawley Village, supporting some of our PhD students and their families. Our regional and rural sites also have some student accommodation through shared houses and apartments.

Investment

\$1.77 billion cash and other financial assets held on investment as of 31 December 2025.

UWA has environmental, social and governance risks and considerations outlined in its Investment Policy Statement (IPS). The IPS incorporates the requirements of UWA under the Modern Slavery Act 2018 (Cth) and the expectations of UWA's implemented consultant, Mercer Investments (Australia) Limited and investment manager(s) to assess and address this risk and report on the issue in line with the regulations and with the IPS policy. UWA maintains a webpage to inform the community of the University's sustainable investment philosophy.

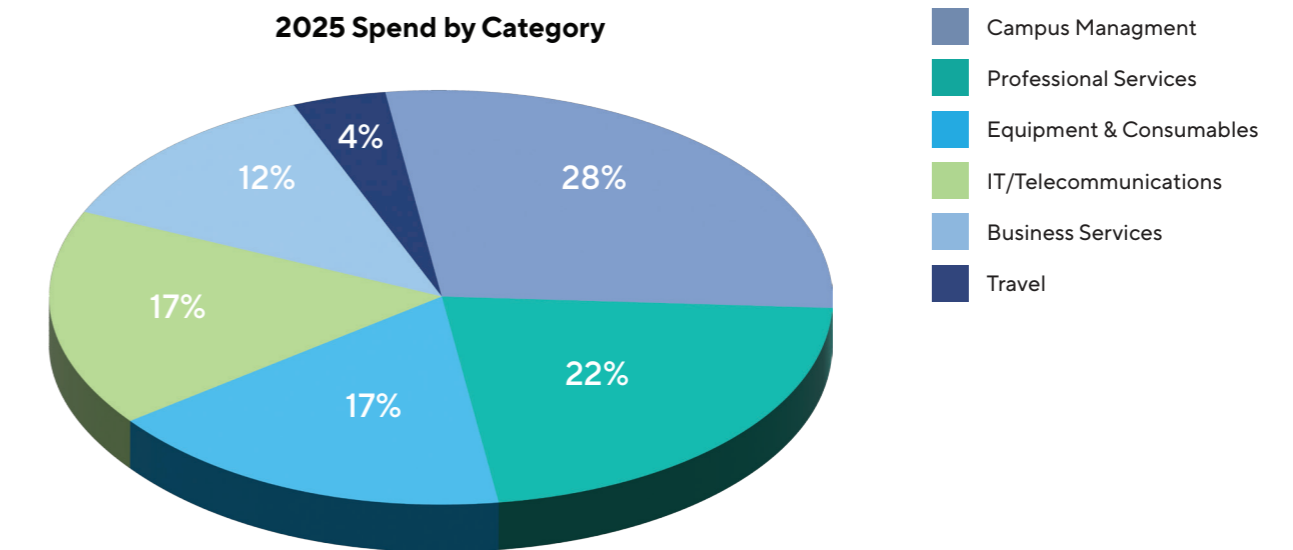
Supply Chain

UWA's diverse and complex supply chains reflect the breadth of activities that are undertaken to support the provision of education and research. The University classifies its expenditure on goods and services across six category areas to support

business need and facilitate management: Campus Management, Professional Services, Equipment & Consumables, IT/Telecommunications, Business Services and Travel.

2025 Spend Profile

\$536 million	+4%	\$517 million (2024)
Total non-employee related expenses		
4,350 Suppliers	-18%	5,294 (2024)
156 Sub-categories of goods and services	+123%	70 (2024)
64 Countries	-19%	79 (2024)



CATEGORY	SUB-CATEGORIES INCLUDE
Campus Management	Building repair and maintenance, construction, equipment maintenance, utilities, security services, furniture, property rent, electrical services.
Professional Services	Recruitment agents, training & development, subject matter specialists (research and business), legal services, construction services, allied health services, strategy & analysis, auditing services.
Equipment & Consumables	Scientific equipment and maintenance, medical & laboratory chemicals, gases, animal feed, consumables.
IT/Telecommunications	Software licences, audio visual services & equipment, data centre, infrastructure, hardware, networking support, cyber security.
Business Services	Marketing, events, logistics, office supplies, clothing, catering, libraries
Travel	Travel management system and services, transport and accommodation

CONTROLLED ENTITIES

1. The University Club of Western Australia Pty Ltd
ABN 46 100 673 603
Principal activity - Events and Function Centre (University Club)
2. Perth International Arts Festival Ltd
ABN 85 631 934 677
Principal activity - Arts and Culture Events (Perth Festival)
3. UWA Sport Pty Ltd
ABN 96 605 887 189
Principal activity - Sports and Recreational Activities (UWA Sport)
4. UWA Accommodation Services Pty Ltd
ABN 74 144 621 974
Principal activity - Student Accommodation
5. UWA Accommodation Holdings Pty Ltd
ABN 30 662 309 382
Principal activity - Short Term Accommodation
6. Perth Festival Special Projects Ltd
ABN 79 655 389 469
A wholly owned subsidiary of Perth International Arts Festival Ltd
Principal activity - Arts and Culture Events
7. Raine Medical Research Foundation Ltd
ABN 98 682 675 145
Principal activity - Fundraising and Management of Partnering and Grants
8. The University of Western Australia - India Private Limited (UWA India) is a Private Limited Entity, incorporated in India (CIN: U85306MH2025FTC462780), with the majority shareholder being UWA International Holdings Pty Ltd (UWA IH) (ACN 691 577 689). Established as a controlled entity at the end of 2025
Principal activity - Deliver Academic Programs to Overseas Students

APPROACH TO MODERN SLAVERY MITIGATION

UWA is committed to its responsibility to staff, students, and community to ensure that modern slavery risks are identified and addressed within its operations, investments, research, controlled entities and supply chains.

This statement reflects that commitment and reports on the steps undertaken to identify, assess and address the risks of modern slavery for the period 1 January 2025 to 31 December 2025 and future commitments in relation to mitigating modern slavery risks. The University's approach is based on the 2011 United Nations Guiding Principles on Business and Human Rights¹ and the underlying 'Protect, Respect and Remedy' framework.

The Chief Financial Officer is the University Executive accountable for the development of the UWA Modern Slavery Statement by the Modern Slavery Working Group (Working Group). The Working Group operates under the direction of the Office of the Chief Financial Officer and is chaired on their behalf by the Head of Procurement.

The Working Group's terms of reference encompass the following responsibilities:

- Develop and have oversight of UWA's annual Modern Slavery Statement
- Develop and manage UWA's Modern Slavery Plan and related targets
- Manage modern slavery mitigations in accordance with the Modern Slavery Plan
- Review membership and terms of reference for continuous enhancement
- Inform UWA's approach to modern slavery mitigation through benchmarking, collaboration, and research.

UWA has an established governance framework, including key policy documents that relate specifically to modern slavery including the Code of Ethics and Code of Conduct, the Corporate Social Responsibility Policy and the Investment Policy.

In developing this Statement, UWA recognises that its operations, supply chains and controlled entities may be subject to the risk of modern slavery and accordingly, has engaged with all relevant operational areas to identify current mitigations in place, actions taken during the reporting period and future actions planned to address those risks.

Controlled entities were consulted in the development of this statement to identify the level of modern slavery risk in their operations and supply chains, to understand current mitigation strategies underway and those planned and to look for opportunities to improve the management of these risks into the future. It is again acknowledged that more in-depth and frequent engagements in future reporting periods would be beneficial.



¹ 2011 United Nations Guiding Principles on Business and Human Rights <https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights>

Identifying Modern Slavery Risks

When identifying modern slavery risks, UWA understands that this relates to the potential for UWA and its subsidiaries to cause, contribute to or be directly linked to modern slavery through its operations and supply chains.

It is acknowledged that the risk of modern slavery is present throughout the organisation, with the risks considered to be greater within UWA's operations (including staff, students and investments), and supply chain than within research and education. Consequently, UWA's previous efforts to assess and mitigate modern slavery risks focused on operations and supply chain, but during 2025 these efforts have been expanded to incorporate research practices.

During 2025 the Modern Slavery Working Group undertook a risk assessment that encompassed supply chain, research operations, people (staff and students), investments, international operations and travel plus transnational education. This risk assessment sought to identify modern slavery risks, causal factors, consequences, controls in place, residual risk and the exercise was able to determine what actions should be put in place to improve the related level of risk.

Supply Chain

According to Walk Free's Global Slavery Index², Australia is exposed to the risk of modern slavery through its imports, including those purchased by UWA. Whilst UWA's overall supply chain risk is considered low due to consistently low levels of imports, it is acknowledged that services such as cleaning, catering, maintenance, security and construction, which account for a considerable proportion of the University's expenditure, have an elevated risk of modern slavery.

During 2025, UWA adopted a multi-faceted approach to strengthening the identification of modern slavery risks within its diverse and complex supply chain, that ranges from once-off low value consumable purchases to high value, multi-year equipment and maintenance contracts. Key supply chain risk identification activities undertaken during 2025 include:

Leveraging university sector tools: Utilising the Australian Procurement Network (AUPN) Modern Slavery Dashboard to enhance visibility of modern slavery risks across spend categories.

Improving spend transparency: Working towards participating in the Australian University Procurement Network (AUPN) collaborative spend analysis program by implementing the Sievo system to improve the accuracy and consistency of spend categorisation. Associated due diligence spanned the second half of 2025, positioning UWA to implement the program during the first half of 2026.

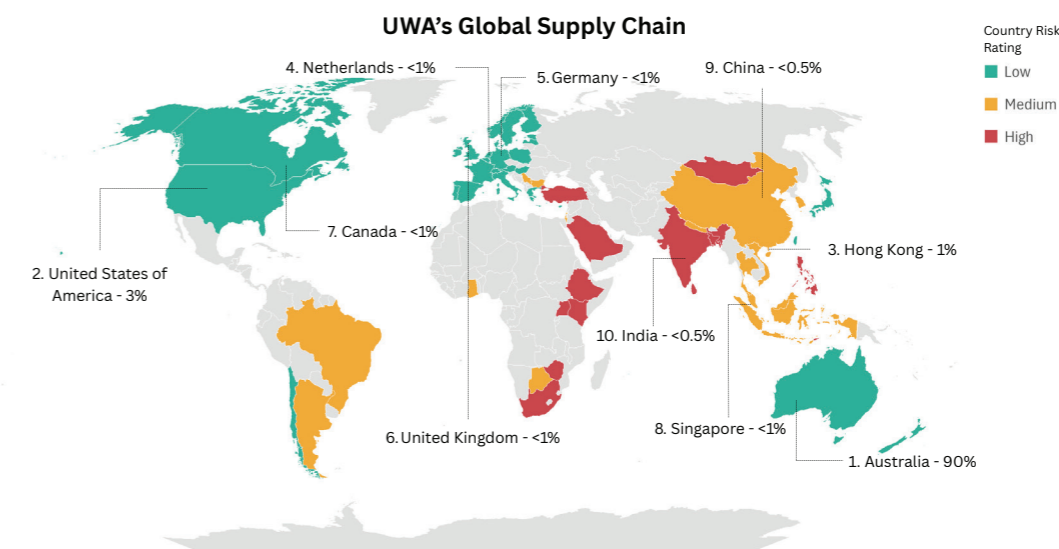
Supplier risk segmentation and due diligence: Conducting a supplier segmentation exercise to identify UWA's suppliers assessed as higher risk and then requesting the completion of a Supplier Self-Assessment Questionnaires (SAQ). Utilising the AUPN's standard template, this process enhanced UWA's understanding of supplier practices and related compliance and risk.

Independent spend analysis: Engaging an external spend analysis consultant to recategorise UWA's 2025 spend in accordance with AUPN taxonomy and identify higher risk suppliers. The outcomes of this analysis informed this Statement and helped shape the development of the University's supply chain mitigation activities for 2026.

Supply Chain risk assessment: Conducting a risk assessment that identified key risks within UWA's supply chain, including varying levels of awareness or knowledge related to modern slavery risk across the University, and limitations in current contract management processes and systems to actively and adequately monitor ongoing risks of existing supplier base. These key risks, identified collaboratively during the risk assessment, have informed both current modern slavery prevention actions and UWA's roadmap of mitigations.

In 2025, UWA procured goods and services from a diverse supplier base spanning 64 countries, with more than 90% of expenditure with Australian organisations. UWA's global supply chain includes countries that are rated low, medium or high by the AUPN dashboard.

The map below illustrates three aspects of UWA's global supply chain: our top ten countries by spend (ranked 1 to 10), the share of expenditure allocated to each of these countries and the modern slavery country risk ratings that apply across our whole supply chain.



	Country	Number of Suppliers	Key Subcategories
1	Australia	3,730	Building repair & construction, equipment maintenance
2	United States of America	155	IT services, scientific equipment
3	Hong Kong	17	Educational services, laboratories and research
4	Netherlands	12	IT services, electronic databases
5	Germany	29	Electronic databases, laboratories & research
6	United Kingdom	72	Software licenses, research equipment
7	Canada	24	IT services, advisory services
8	Singapore	31	Software licenses, marketing & events
9	China	37	Scientific equipment, education services
10	India	11	Infrastructure and networking support, IT services

Other higher risk countries that UWA purchased goods and services from include Timor-Leste, the Philippines, Sri Lanka, Bangladesh, Saudi Arabia, South Africa, Turkey and Mongolia however related spend only accounted for 0.2% of total 2025 spend.

² Global Slavery Index: <https://www.walkfree.org/global-slavery-index/>

Operations

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

STUDENTS

International student recruitment is recognised as a key modern slavery risk within the higher education sector. As students are welcomed from across the globe, international students may be vulnerable to practices such as debt bondage or exploitation by education or migration agents.

Integrated learning opportunities for students, which are an important component of UWA's learning and teaching experience, also carry potential modern slavery risks. These opportunities include paid and unpaid placements or internships, overseas placements with host organisations, placements

undertaken via third party providers, industry mentoring programs, international research project work, global learning or exchange opportunities, and industry projects.

STAFF

UWA's staff are protected by UWA's terms and conditions of employment, its industrial agreements, and related policies and procedures that support ongoing compliance. These measures provide a framework that protect staff and sets out clear processes to raise or identify potential risks.

The risk assessment identified that individuals engaged in insecure, informal, or visa-dependent roles could be at a heightened risk of modern slavery. This includes, but is not limited to, casual

staff, postdoctoral researchers, international students, higher degree by research (HDR) students, volunteers, interns, individuals undertaking practicums or placements, and those employed on short-term contracts.

RESEARCH

The risk assessment identified that inadequate policies and practices to identify and mitigate modern slavery risks in research-related partnerships, and fieldwork could result in unethical labour practices or human rights violations.

INVESTMENTS

UWA acknowledges that there is potential for the investments made by the University to inadvertently support entities or sectors with poor labour practices, including forced labour, human trafficking, or exploitative working conditions, either directly within their operations or across their supply chains, thereby exposing UWA to modern slavery risks.

CONTROLLED ENTITIES

Further work is still required to undertake a more comprehensive assessment of modern slavery risk across the University's controlled entities, and this will continue to be a focus for 2026.

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

The University Club has identified the international farming of coffee beans as their highest risk of modern slavery.

Perth International Arts Festival Ltd (Perth Festival)

Perth Festival has undertaken a risk-based assessment of its operations and supply chains to identify potential modern slavery risks. Based on the nature, scale and geographic location of its activities, the Perth Festival has assessed its overall modern slavery risk as low.

The Perth Festival operates predominantly within Australia and engages artists, performers, employees and suppliers under formal contractual arrangements. The Perth Festival recognises, however, that the arts and cultural sector can present specific vulnerabilities, including risks associated with underpayment, insecure work arrangements, and the engagement of freelance artists and short-term contractors. While no incidents of modern slavery have been identified, the Perth Festival acknowledges these inherent sector risks and remains vigilant in mitigating them.

UWA Sport Pty Ltd

Staff of UWA Sport fall under the appropriate safeguards and agreements applied by UWA. UWA Sport has functions dedicated to People, Culture and Inclusion with oversight on the safety and wellbeing of its staff. While UWA Sport's supply chain includes some high-risk categories such as sporting goods and uniform suppliers, it endeavours to source locally, where possible.

UWA Accommodation Services Pty Ltd

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

UWA Accommodation Holdings Pty Ltd

This entity facilitates hotel management operations. Its primary activity is the management of an external operator (AAPC Limited and AAPC Properties - together referred to as Accor Pacific) to deliver hotel services and operations to and on behalf of UWA. Accor Pacific (AAPC) is responsible for the hotel operations and publishes its own annual Modern Slavery Statements in accordance with the Modern Slavery Act.

Raine Medical Research Foundation Ltd

This entity was established in late 2024 and reports minimum spend and activity.



Actions taken to Assess and Address Modern Slavery Risks

Informed by the comprehensive risk assessment described under section 2 above, the Modern Slavery Working Group developed UWA's Modern Slavery Plan during 2025. This Plan represents a significant milestone and will serve as a roadmap to guide modern slavery mitigation activities during 2026 and 2027 across the University.

Supply Chain

Policy Framework

UWA's expenditure is governed by the procurement principles of probity, fairness, value for money, sustainability and risk managed procurement. Procurement activities are governed by the Finance Policy and the Procurement Financial Control Document (FCD). Purchases that are assessed to be high value and / or high-risk undergo a formal procurement process facilitated by Procurement. In 2025, the Procurement FCD underwent a further annual review and update, enhancing clarity of requirements and strengthening spend management practices through ongoing continuous improvement.

A Supplier Code of Conduct was developed to clearly establish UWA's expectations for ethical labour practices, improving supplier accountability and providing a consistent basis for engagement and enforcement.

Supply Chain Analysis

UWA undertakes an annual risk-based analysis of its expenditure to identify higher risk categories, countries and suppliers as part of ongoing category management activities. The high-risk suppliers identified via this process were invited to complete a SAQ (Self-Assessment Questionnaire) which was scored in line with AUPN guidance, and related mitigation plans were determined by the Category Managers.

In early 2026, UWA engaged the services of a spend analysis consultant to carry out a thorough categorisation exercise in relation to 2025 spend to inform this Statement and future mitigation activities.

Procurement Process

UWA appreciates that procurement processes have an important role to play in reducing the risk of modern slavery in operations and supply chain. Specific ongoing related activities include:

- Considering modern slavery risks during all Procurement-managed evaluation processes, by means of related evaluation criteria.
- Incorporating modern slavery clauses in each procurement contract with suppliers executed on UWA templates.
- Establishing panels to consolidate the number of suppliers engaged, to achieve greater transparency, operational efficiencies, sustainable outcomes, and facilitate supplier management.
- Incorporating specific modern slavery-related obligations into several supplier contracts that require active progress on modern slavery awareness, risk mitigation, and continuous improvement.
- Adopting a technology-based approach to run Procurement-led market processes, to increase transparency and consistency in supplier engagement and improve oversight of procurement activity.
- Introducing a standardised procurement contract approval process, incorporating modern slavery due diligence and strengthening oversight of supplier risk.

Training

The Procurement team continues to develop their understanding of modern slavery and the potential impact on supply chains and operations through participation in forums, webinars, conferences, and from related publications. They also undertake the Chartered Institute of Procurement and Supply's (CIPS) Ethical Procurement & eLearning Test annually.

Contract Management

A contract lifecycle management system (CLMS) and contract management framework is in the process of being implemented. Once operational by mid 2026, the program will strengthen UWA's ability to identify and mitigate modern slavery risks by improving visibility, consistency, and oversight across the contract lifecycle.

Collaboration

The Australasian Universities Procurement Network (AUPN) modern slavery program is a Higher Education sector-wide initiative involving 41 universities across Australia and New Zealand. The program leverages member collective expenditure and market influence as well as expertise to maximize purchasing power, drive ethical procurement, and ensure compliance with the Modern Slavery Act 2018 (Cth). Key sector-wide initiatives that UWA benefited from during the reporting period include:

- Risk Data: Sector-wide risk assessments to identify and prioritise supply chain categories to be managed at sector level, including medical equipment, ICT, and international student recruitment.
- Capability Uplift: Regular professional development and knowledge sharing opportunities, including forums, newsletters, university case studies.
- Supplier Engagement: Self-Assessment Questionnaires (SAQ) in laboratory and medical consumables, followed by engagement with the five highest risk suppliers. Plus, UWA participated in an Electronics Watch pilot, that monitors 27 factories across seven countries.

- Industry Collaboration: Including a temporary migrant survey that captured 150 international student experiences from 18 universities and is being used to develop sector-wide guidance.
- Third Party Support: UWA benefited from the Australian Catholic Religion Against Trafficking in Humans' (ACRATH) Educating for Change micro-credentialed course.

Throughout 2025, UWA has been working towards the implementation of the AUPN spend analysis program powered by Sievo, by conducting all related due diligence and stakeholder engagement. UWA is now poised to implement during the first half of 2026 which will strengthen spend analysis through greatly enhanced transparency, visibility and benchmarking.



Operations

There is a publicly available reporting tool on UWA's website for reporting incidents of inappropriate behaviour by, or toward, a member of the University community, including current, former or prospective students or staff as well as community members. Modern slavery is incorporated as a specific reportable field, and it is possible to make an anonymous report or without identifying anyone else involved. To date no reports of any modern slavery related issues have been submitted via this portal to the Complaint Resolution and Student Conduct Centre. Support has been provided to a small number of students who have raised related concerns during the year.

STUDENTS

Governance

UWA has a range of policies and procedures upholding the rights and freedoms of all students in line with national legislation and international commitments. The University Charter of Student Rights and Responsibilities sets out the fundamental rights and responsibilities of students and their organisations at UWA.

Recruitment

The UWA Future Student Recruitment team consolidates all marketing, communications, admissions and future student related activity.

Engagement follows the Australian Privacy Principles (APP) from the Privacy Act 1988 in all interactions with students, parents and agents. This is to protect the identity of the student and the personal information that is provided to the University through an enquiry or study application.

In the recruitment of international students, the University ensures compliance with Education Services for Overseas Students (ESOS) and the ESOS National Code, working only with education agents and third parties who have been vetted through a due diligence process. UWA's staff and agents advise students appropriately of their rights and obligations and respond promptly to and investigate complaints or concerns students raise.

UWA's engagement network with other Australian institutions such as the Australian Universities International Directors Forum and industry associations such as the International Education Association of Australia (IEAA) allows for broader awareness and identification of any industry concerns of modern slavery.

Onboarding and Orientation

The divisions of Student Wellbeing and Engagement, International Student Support and Global Learning and Sponsored Students are within the portfolio of the Deputy Vice Chancellor, (Education and Student Experience). These teams are responsible for designing and delivering education to raise students' awareness of modern slavery in all its forms. Information sessions are delivered during orientation to ensure international students are aware of potential risks and students can discuss concerns by visiting The Living Room without an appointment or refer into [mental health and wellbeing support](#), to access specialist confidential support and advocacy as well as guidance and support on how to report concerns. Information is also included in pre-departure sessions for international students. The University ensures compliance with Education Services for Overseas Students (ESOS) and ESOS National Code when onboarding and orienting students.

Student Internships, Placements and Unpaid Work

UWA has a standard process for placements and internship places for all students no matter the unit of enrolment or course of study to simplify the approach and facilitate related oversight. All placement documentation is entered and received prior to confirmation of placement and applications being received by a placement host. This measure ensures the placement is assessed as acceptable for placement and does not better suit a paid

employment position or breach fair work rules. In addition, placement check points are mandatory including feedback from the host organisation, and these checks trigger reviews by staff to ensure placement health and reviews are met.

Student employment

Employment opportunities are advertised through a jobs board exclusively for UWA students, although students can apply for these opportunities directly with the employer. Due diligence is undertaken prior to the approval of each organisation and then each job is also reviewed to ensure that it complies with the Fair Work Act, lists a salary or relevant award and is not on a commission or trial basis.

Awareness and Advocacy

UWA's [modern slavery webpage](#) includes information on the signs of modern slavery, particular risks for international students, the rights of individuals while living and working in Australia, and how to seek support and/or make a report in relation to modern slavery.

The UWA Modern Slavery Research Cluster is an interdisciplinary network of researchers from across the University. In 2025 they held a public webinar showcasing the work of the Cluster across History, Business and Law with a guest speaker.

Student Support

UWA provides a publicly available fees calculator that ensures all prospective students and their advisors are clear about the actual costs of courses that includes frequently asked questions and guidance on appropriate fee levels. This tool serves to enable accurate budgeting and guard against unscrupulous agents increasing fees.



STAFF

UWA's terms and conditions of employment are set out in employment contracts and Enterprise Agreements. These industrial instruments comply with all relevant legislative and common law obligations and are provided to employees at the commencement of their engagement with UWA. The University's employment practices met the requirements of the *Fair Work Act 2009* (Cth) and all other applicable legislation.

UWA engages senior employees through individual employment contracts that comply with current legislation. Letters of appointment for adjuncts and other non-employees are prepared in accordance with relevant legislation, including the *Work Health and Safety Act 2020* (WA), *Equal Opportunity Act 1984* (WA), and reflect University policies and applicable Commonwealth privacy requirements.

UWA has a suite of policies, procedures and practices that promote equal opportunity, support diversity and inclusion, and ensure compliance with anti-discrimination and human rights legislation from recruitment through to retirement. These policies are designed to provide a safe working environment and protect staff from mistreatment at work. They also aim to provide a workplace free of intimidation, threats, actual or threatened physical and/or sexual violence, forced labour and abusive working conditions. Policies are available to staff through UWA's Policy Library and failure to comply may result in disciplinary action. There are also a range of mechanisms in place for staff to make enquiries or complaints regarding their employment, without fear of prejudice or adverse consequence.

UWA has a dedicated People and Culture team to assist employees with enquiries or complaints. The University's Complaint Resolution and Student Conduct Centre assists non-employee staff with enquiries or complaints. If staff remain unsatisfied or do not feel comfortable approaching People and Culture or the Complaint Resolution and Student

Conduct Centre, they are able to lodge a dispute or grievance in line with their Enterprise Agreements or the relevant policy (for staff engaged under other industrial instrument) or make a confidential disclosure to a University Disclosure Officer.

To actively manage modern slavery risks in the workplace, UWA:

- Ensures staff are aware of their obligations to comply with policies
- Ensures that all legal obligations are complied with at every stage of the employment life cycle
- Does not charge staff for the costs associated with their recruitment or engagement (apart from occasionally items like a National Police Clearance)
- Ensures staff have the appropriate working rights to work in the appropriate country

During 2025, the People and Culture team focused their modern slavery mitigation efforts on conducting a review of available modern slavery training courses with a view to rolling out to staff who are interacting directly with students or have frequent purchasing responsibilities. A training course was selected, trialled and integrated into our learning portal, and those who undertook the training found it valuable. The modules will continue to be available as required and will inform future iterations.

RESEARCH

UWA's Office of Research continues to work towards adopting a sector-based, best practice approach to assessing modern slavery risk in its research engagements. This includes the incorporation of modern slavery-related clauses into standard UWA research contracts to ensure appropriate terms are agreed with partners. Work has also commenced towards ensuring UWA's due diligence assessment processes for individual research contracts consider modern slavery risks.

INVESTMENTS

In accordance with the University's Investment Policy Statement (IPS), UWA expects its implemented consultant and investment manager(s) to assess and address modern slavery risk as they would any other risk and to comply with reasonable requests for information from UWA. Investment managers are expected to manage and report on modern slavery in line with local regulations, as well as in line with UWA's IPS.

UWA's implemented consultant, Mercer, reports to the University annually on modern slavery combined with other environmental, social and governance (ESG) measures. Mercer is required to monitor and screen UWA's investment portfolio for any modern slavery risks or red or amber flag indicators and provide details of any risk mitigations in related reports to the Investment Committee. The University also requires Mercer and their investment managers to actively engage with any companies that are found to have red flag exposures.

Mercer surveys its underlying investment managers annually on their monitoring and management of UN Global Compact (UNGC) and modern slavery red flagged incidents and utilises the results of the survey along with other routine screening assessments, to guide their manager engagement process based on exposure and materiality. As of 31 December 2025, there were no holdings within the University's portfolio with any modern slavery red flags.

CONTROLLED ENTITIES

Where possible the University Club sources locally within West Australia or Australia to minimise the risk of unethical agricultural practices. The University Club also remains in line with industry award and National Employment Standards to ensure fair treatment of all staff, including non-resident visa holders.

While UWA Sport's supply chain includes some high-risk categories such as sporting goods and

uniform suppliers, it endeavours to source locally from respected Australia based suppliers wherever possible to reduce exposure to modern slavery risks.

UWA Sport and the University Club conduct their high value procurement processes in conjunction with UWA's Campus Management and / or the Procurement team.

The Perth Festival places a strong emphasis on ethical employment practices and fair treatment of all workers. Responsibility for these matters is supported through a dedicated People team and established governance and payroll controls. Key actions undertaken to assess and address modern slavery risks by the Perth Festival include:

- Ensuring all employees, artists and contractors are engaged under written agreements that clearly set out payment terms and conditions
- Regular review of employment and engagement contracts to confirm appropriate classification, remuneration and compliance with applicable industrial instruments
- Verification of pay rates and conditions through reference to relevant industry guidance, including advice from Live Performance Australia
- Implementation of payroll and finance controls, including segregation of duties and approval processes, to support accurate and timely payment
- Ongoing oversight by management to ensure fair and lawful remuneration practices across the organisation

Through these measures, the Perth Festival seeks to reduce the risk of exploitation, underpayment or unfair labour practices within its operations and to promote ethical and responsible employment practices consistent with modern slavery obligations.

It is acknowledged that UWA's controlled entities would benefit from additional support from the Working Group to understand, assess and address their modern slavery risk.

Assessing the Effectiveness of Actions

Assessing the effectiveness of the University's approach to modern slavery mitigation involves monitoring operations and supply chains for any signs of exploitation. During this reporting period, UWA did not identify any potential concerns but recognises that addressing modern slavery requires continuous vigilance, improvement, and adaptation.

During 2025 the Working Group undertook a comprehensive risk assessment and progressed the mitigation commitments made in the 2024 Statement among other initiatives and

collaborations. UWA also engaged the human rights expertise of Fair Futures in early 2025 to review our approach to modern slavery mitigation and receive guidance on continuous improvement opportunities. This reflects the importance UWA attaches to its responsibility in relation to modern slavery mitigation and demonstrates a commitment to augmenting the effectiveness of its actions.

UWA is committed to strengthening identification and assessment processes and expanding the reach and impact of mitigation and remediation strategies.

Other Relevant Information

For 2026, the University's mitigation efforts will be focused on continuing to improve our approach to modern slavery mitigation by undertaking the following additional actions::

- Create and maintain an accessible modern slavery knowledge base for all staff, providing guidance and tools to support responsible procurement practices.

Governance Action Plan

- Implement a Modern Slavery Policy to ensure staff have clear procedures for managing modern slavery risks within procurement activities.
- Continue to increase oversight of modern slavery risks across UWA's controlled entities and develop related policy frameworks.

Risk Assessment & Due Diligence

- Complete the implementation of the AUPN Sievo spend analysis system to enhance visibility and monitoring of supply chain risks.
- Develop a risk-based supplier due diligence tool within the contract management framework.

Supplier Management

- Implement the Supplier Code of Conduct and embed references in templates and contracts.
- Develop a supply chain specific modern slavery remediation plan outlining clear steps for addressing potential issues.
- Participate in ongoing monitoring of ICT suppliers via the AUPN supported arrangement with Electronics Watch.

Supply Chain Action Plan

Training & Awareness

- Provide specific modern slavery awareness training for staff involved in high-risk procurement projects to be delivered as part of the procurement planning process.

Contract Lifecycle Management

- Implement a Contract Lifecycle Management System to support consistent contract oversight.
- Develop and implement a Contract Management Framework to standardise contract risk assessments, governance and monitoring processes and integrate modern slavery mitigation.
- Increase performance monitoring in alignment with the Contract Management Framework.

STAFF

- Develop and implement concise online modern slavery training for UWA staff particularly for those in higher risk roles, e.g. student-facing, purchasing.
- Strengthen the capturing of appropriate data in the Human Resource Information System (HRIS) and associated payroll systems.
- Strengthen role evaluation and classification processes, particularly in relation to casual staff.

Operations Action Plan

STUDENTS

- Improve communications to address student safety and support pathways.
- Enhance engagement with student-related bodies in relation to modern slavery.
- Review international student agent agreement templates.
- Increase engagement with the Australian Federal Policy (AFP) and WAPOL Community Engagement Division

RESEARCH

- Explore the development of modern slavery specific due diligence in relation to research contracts and partnerships.
- Design appropriate referral pathways for projects or contracts identified as high risk.
- Build the capacity of staff to identify modern slavery risks in research activities and how to respond.

INTERNATIONAL OPERATION & TRAVEL

- Establish operations and frameworks that include reporting mechanisms and develop appropriate related communications channels.





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