MONASH University

MODERN SLAVERY ACT REPORT

REPORTING PERIOD JANUARY TO DECEMBER

2022

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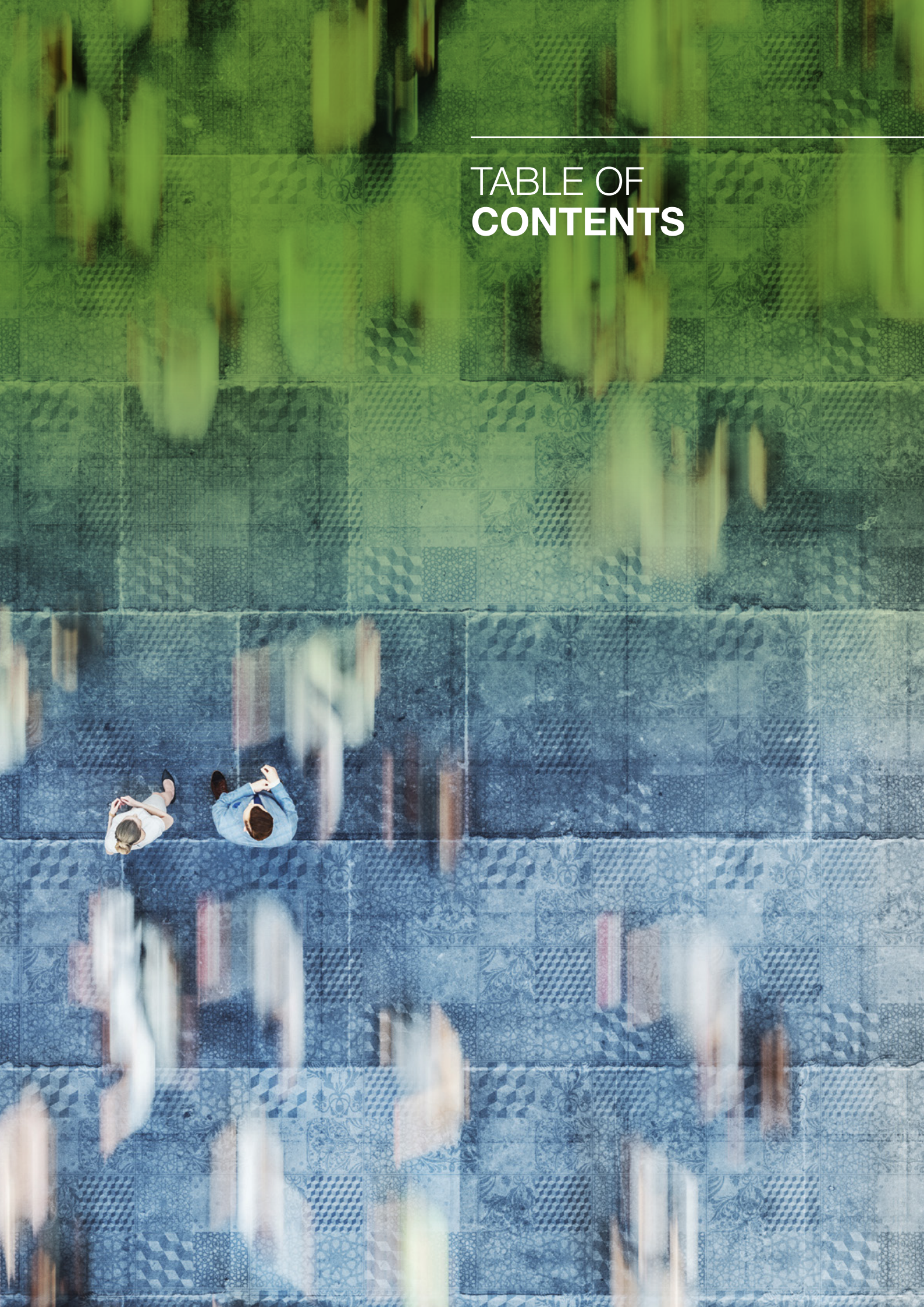

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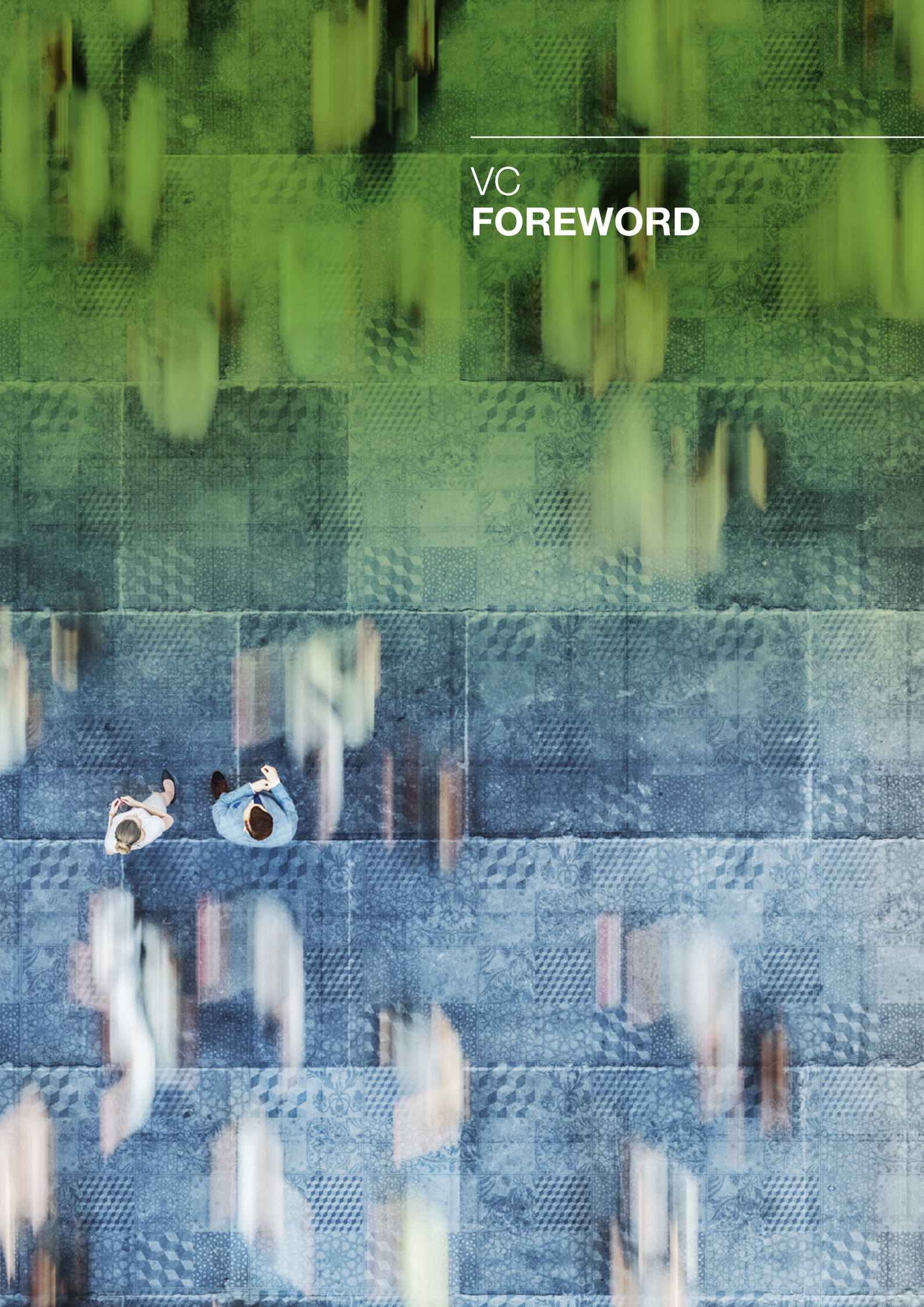
MONASH UNIVERSITY recognises that its Australian campuses are located on the unceded lands of the people of the Kulin nations, and pays its respects to their elders, past and present.

VC
FOREWORD



Monash University supports universal human rights and is opposed to all forms of modern slavery. With the completion of our third Modern Slavery Act Report, Monash University continues to demonstrate its commitment to sustainability and human rights.

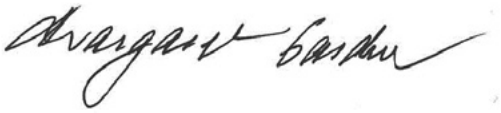
We remain committed to the United Nations' 17 Sustainable Development Goals, to achieve net zero emissions by 2030, and to actively seek out and address any potential instances of modern slavery within our global operations and supply chains.

Throughout 2022, we continued to operate in a highly dynamic, complex global environment – despite changes and challenges within our supply chain and operations, our ongoing flexible approach to our program enabled improvements to our targeted focus on modern slavery.

We recognise that we cannot do this alone – it requires accountability and a sustained effort and collaboration with our suppliers, partners and the wider Monash community. As our work progresses, we benefit from increased awareness of modern slavery across our community and around the world.

Our program of work contributes to the ability of people everywhere to live free from exploitation, experience safe work conditions, and receive fair treatment. Through Monash's education, research and operations to make positive change on a global scale, we will continue to champion human rights and sustainability.

Though we have made significant progress, we know there is still much to do. We are committed to reviewing and improving our supply chain and operations to assist in the drive to eradicate modern slavery.



Professor Margaret Gardner AC
President and Vice-Chancellor

THE MONASH UNIVERSITY **PLAN**

FIVE-YEAR PROGRAM

In 2020 Monash published our first Modern Slavery Report in which we set out a five-year program commencing 2021.

2021	2022	2023	2024	2025
Supporting procurement systems and processes Basic tracking system Internal risk assessments Risk assessments Compliance monitoring.	Onshore and off-shore training Advanced tracking system Industry deep-dive Agreement and sourcing templates update Assessment of new risks Operational framework Compliance monitoring Commence onboarding of offshore wholly controlled entities.	Training program review Expanded compliance monitoring Offshore agreement and sourcing templates update Implementation of operational framework Expand offshore training rollout.	Identify risks in onshore research and education activities Commence onboarding of offshore partially-controlled entities Continuous improvement for onshore entities Continue to expand offshore training.	Offshore research and education Continuous improvement Program review and forward planning.

KEY OUTCOMES **FOR 2022**

8 DIFFERENT COMMERCIAL CONTRACT TEMPLATES UPDATED WITH MODERN SLAVERY TERMS

2400 NEW SUPPLIERS ACCEPTED THROUGH UPDATED ONBOARDING PROCESS

20 IT HARDWARE MODELS ASSESSED WITH ELECTRONICS WATCH[1]:

8 KNOWN ASSEMBLY FACTORIES IDENTIFIED

8 FACTORIES IDENTIFIED WHERE INCREASED TRANSPARENCY IS REQUIRED

2 UNKNOWN ASSEMBLY FACTORIES IDENTIFIED

6 FACTORIES WHERE MONITORING AND REPORTING OCCURRED IN 2021

Feedback provided to the Attorney General's Department on Modern Slavery Legislation.

TRAINING STATISTICS:

4789 STAFF TRAINED VIA ONLINE TRAINING IN THE LAST YEAR

200+ STAFF RECEIVED ADDITIONAL TRAINING VIA FACE-TO-FACE PRESENTATION, ON RISK IDENTIFICATION, CLAUSES AND TEMPLATES.

100% KEY STAFF COMPLETED ONLINE TRAINING

1. Electronics Watch is a leading not-for-profit that aims to improve human rights in the IT hardware industry.

Over the 2022 reporting period, Monash University has identified no instances of modern slavery in our supply chain or operations. Significant progress on our five-year plan continues to be made. We acknowledge that as the program evolves, we may uncover risks as yet unknown. The lessons learned over the past three years, this year, and subsequent years will continue to shape the program of work. An updated program and action plan are included in this report.

PROCUREMENT

Those involved with the procurement of goods and services continue to play an important role in reducing our modern slavery risk. This is supported by updates to policies and procedures and training. As the program of work continues, the University updates its practices to reflect the lessons learned and implement improved ways of functioning

Training and awareness

- Allocated online modern slavery training to all new staff and monitored training completion for key staff against Key Performance Indicators (KPIs).
- Internal digital communications via internal social network Monash Workplace and staff newsletter to raise awareness
- Updates and maintenance to the University's Modern Slavery website.

Procurement process

- Reviewed the effectiveness of the modern slavery supplier onboarding process, intended to prevent the onboarding of suppliers – including preventing payment – in the event of non-compliance or identified risk. Manual intervention occurs for any compliance failures. In 2022, there were approximately 2400 suppliers onboarded through this gateway; 100 per cent of the suppliers required for this compliance check went through the new process. A number of low value or one-time suppliers are excluded from this process. Excluded suppliers also cover staff performing exam invigilation outside of their regular employment.
- As part of implementing our new Electronics Watch affiliation, we updated the IT New Hardware process to include a step to contact Electronics Watch with hardware model numbers to receive additional information on each supply chain.
- Monash College's offshore partner annual review process and staff recruitment audit were deferred until 2023 due to operational changes at Monash College in 2022.

Template Agreement updates

Updated Monash University Student Placement Agreements to include modern slavery provisions for release in 2023.

THIRD PARTY SPEND TRACKING SYSTEM

A new Working Group was formed by the Australian Universities Procurement Network (AUPN) to simplify the data requested from suppliers. This is to support a higher response rate and higher data quality when bulk supplier engagement occurs. This work will continue in 2023, and this additional preparatory work is necessary as the outcome relates to approximately 30 universities and may impact more than 100,000 suppliers.

INTERNAL ASSESSMENT

Solar panels

Solar panels have been assessed as high-risk both from solar grade polysilicon content and subsequent component or panel assembly[1,2]. The predominant nature of the risk is forced labour, and the risk is difficult to influence as geographic regions remain closely controlled. Additional work is underway and will continue in 2023 when the next material purchase of solar panels may occur.

Cleaning services

Cleaning services continue to be a particular area of potential modern slavery risk. The University has outlined its cleaning needs with the knowledge generated from the modern slavery program of work and discussions with a third party body established to improve labour practices and transparency in the cleaning industry. The primary risk types include forced labour, threats, and servitude, all of which the University is able to influence.

Apparel

The purchasing of high-risk apparel has been assessed to identify all material buyers of apparel, use-cases, spend levels, and current suppliers.

1. Apparel is purchased predominantly within Australia for four primary uses:
    - Sale
    - Events
    - Sports
    - Uniforms

1. **assets.cleanenergycouncil.org.au/documents/resources/reports/Addressing-Modern-Slavery-in-the-Clean-Energy-Sector.pdf** accessed 12 December 2022.
2. **www.state.gov/wp-content/uploads/2022/07/Forced-Labor-and-the-Clean-Energy-Transition-Finding-A-Responsible-Way-Forward.pdf** accessed 5 August 2022.

2. Where apparel is not predominantly made in Australia, the three main countries of origin are high-risk countries:
    - China
    - Bangladesh
    - Pakistan
3. Baseline work was undertaken to clarify the core requirements across the key buying groups
4. The key suppliers were contacted to provide any relevant information and certifications they may have. This was to improve or better understand our apparel supply chain, risks and any in-place positive supply chain efforts in reducing modern slavery risk
5. Research was also undertaken to identify current best-in-class which was found to be "seed to product" traceability where growing raw materials, processing them, and manufacturing products are all known and understood and fair. This level of transparency can be difficult due to the number of third party certifications of varying quality and transparency - it is not always easy to ascertain exactly what certifications mean and the quality of due diligence undertaken before they are issued.

The outcome of the review for apparel is that there are potential high risk aspects of our apparel supply chain that may benefit from increased transparency. A centralised approach to apparel supplier selection may be required as there are numerous groups that may have reason to buy apparel, and many apparel purchases are ad-hoc.

IT Hardware

The process for new IT hardware within Monash eSolutions has been updated to include a required step where basic product information is sent to Electronics Watch in order to increase transparency in our supply chain. The response from Electronics Watch assists in making informed buying decisions, but also enables us to respond to any relevant requests for help from Electronics Watch to assist in driving improvements to the IT electronics industry.

The primary risks are forced labour, threats and deception, human trafficking, servitude and slavery or slavery-like practices. There is scope to influence the major IT hardware suppliers in mitigating these risks.

Retail lease agreements

An initial review into retail leasing agreements, a potential high-risk area, has indicated there are a variety of engagement types. For example, a restaurant retail partner may be subject to franchise agreements with a third party. While the University can state that its retail lease agreements meet legal obligations – including for labour – a more detailed review of the various engagements may be undertaken to identify if additional terms are warranted to further reduce modern slavery risk. Retail leasing agreements will be assessed again in 2024 to allow the prioritisation of other risks in the meantime. The risk from retail leasing agreements includes forced labour, and the University is able to influence these risks.

ASSESSMENT OF OFFSHORE ENTITIES

Monash University Malaysia is now fully onboarded to the Modern Slavery program.

Monash University Indonesia and the World Mosquito Program have representation on both the Steering Committee and Working Group and continue their onboarding steps.

COMPLIANCE MONITORING

KPIs continue to be used and further developed to measure progress and compliance.

100 per cent of key staff completed the allocated online modern slavery training in 2022.

Two new online training completion KPIs have been identified for reporting in the 2023 reporting period to improve the reach of training by establishing the following two new KPIs, each of which has a completion target of 100 per cent:

- Members of the Modern Slavery Steering Committee and Working Group
- The 'most senior staff' at the University.

The modern slavery program of work has been integrated into the Monash University Environmental, Social and Governance (ESG) Framework and progress reporting against ESG commitments is provided throughout the year.

ABOUT THIS **REPORT**

Monash University focuses on delivering high-quality and innovative education and research globally, with an emphasis on ethical and good social governance while operating with integrity and respect.

Modern slavery is a pervasive problem that requires robust solutions based on collective action to generate change in global practice. Monash University recognises that, as part of the global community, we play an important role in helping eliminate exploitative labour practices.

Modern slavery refers to situations where threats, coercion or deception are used to undermine one's freedom and to inflict exploitation. These practices can include human trafficking, slavery, debt bondage, forced labour, the worst forms of child labour, domestic servitude, and forced marriage.

The victims of modern slavery worldwide are estimated to number 49.6 million people daily – nearly one in every 150 people. A total of 27.6 million victims are in forced labour on any given day – this number has grown since the International Labour Organisation's 2022 report[1].

This hidden, large-scale exploitation within our community often harms those least able to defend themselves and those least protected by policy and law.

This report is to demonstrate how Monash is working to identify the risks of modern slavery in our operations and supply chain, and the actions we have taken to address those risks. These are part of our five-year continuous improvement program to systematically address modern slavery within our operations and supply chain.

For the purposes of this report, references to "the University" include activity for all the reporting entities listed in this report unless indicated otherwise.

This is Monash University's third report under the Modern Slavery Act 2018 (Cth) (the Act).

This report was approved by Monash University Council in its capacity as principal governing body of Monash University, on 14 June 2023. President and Vice-Chancellor Margaret Gardner AC is the responsible member.

OUR COMMITMENT

Our commitment is to actively contribute to a future without labour exploitation and human rights violations.

Monash University supports human rights within its operations and supply chain in full compliance with the Act. This is supported by an Environmental, Social and Governance Statement 2021–2025, and an endorsed five-year modern slavery program of work. This program is also supported as part of Monash University's sustainable development framework.

Our program of work has significant leadership support, including the Vice-Chancellor's Group, the University Environmental, Social and Governance and Estates Committee, and the University Council.

As a global leader in research and education, Monash University welcomes feedback and/or questions, or the opportunity to provide additional information concerning this report. Please contact sustainable.procurement@monash.edu

This report outlines the actions taken by Monash University in relation to identifying and mitigating modern slavery risks within its operations and supply chain.

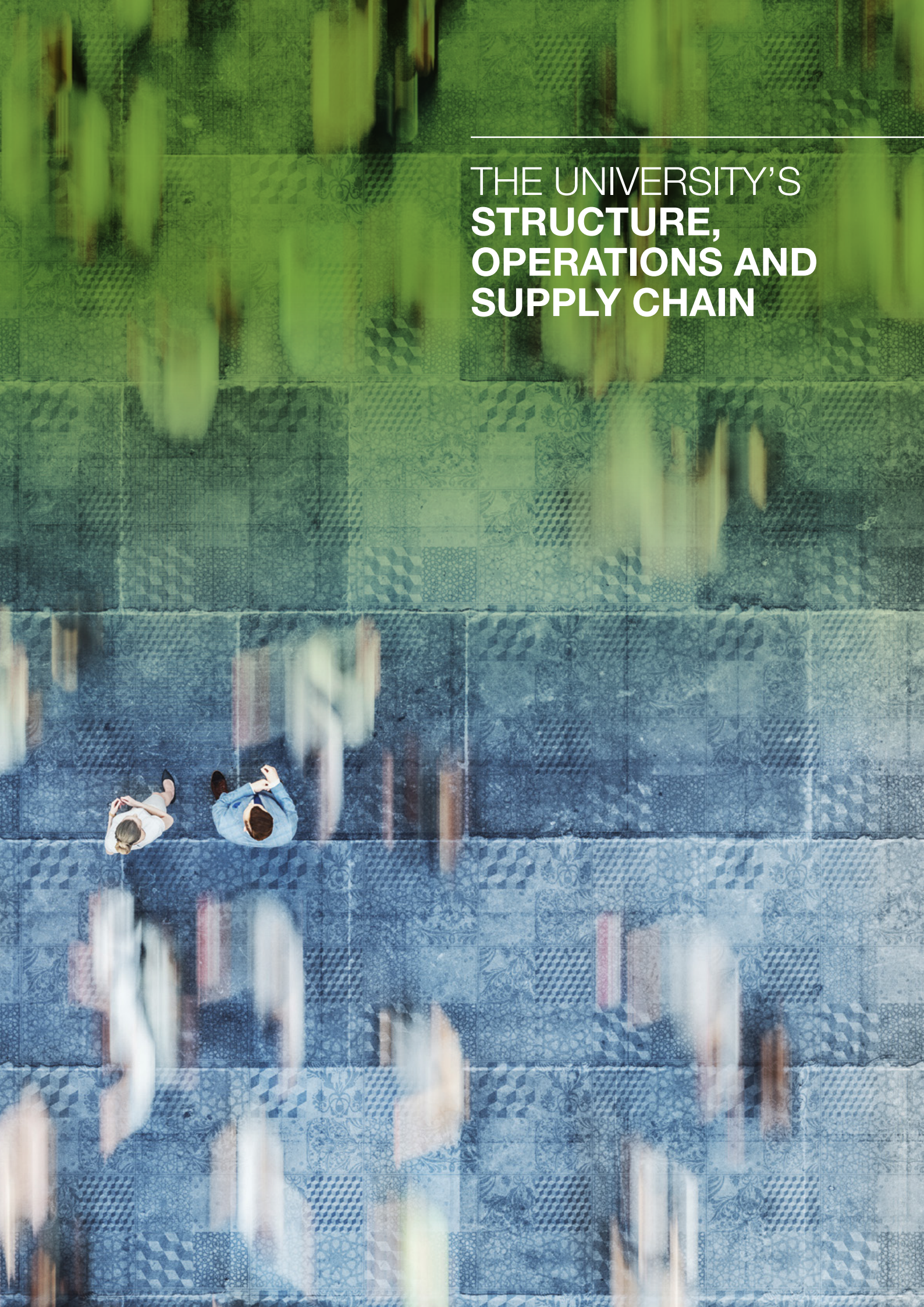
Although we located no instances of modern slavery in 2022, we continue to improve our program to identify and mitigate risks.

1. **International Labour Organisation Global Estimates of Modern Slavery,** viewed 20 December 2022.

ABOUT OUR **UNIVERSITY**

SUMMARY AND KEY STATISTICS

Monash University is a modern, global, research-intensive university, delivering education and research excellence in Australia and across the world with three international teaching locations, six campuses, and more than 100 partner universities. Our strategic plan, *Impact 2030*, charts the path towards realising our purpose through research and education to address the challenges of the age – climate change, geopolitical security and thriving communities – for the betterment of present and future generations.



THE UNIVERSITY'S **STRUCTURE, OPERATIONS AND SUPPLY CHAIN**

STRUCTURE

Monash University is constituted under the Monash University Act 2009 (Vic), which is supplemented by a framework of regulatory instruments, namely the Monash University statute, and a suite of regulations, as well as a range of policies and procedures. Monash University is regulated by the Higher Education Support Act 2003 (Cth) and the Tertiary Education Quality and Standards Agency Act 2011 (Cth), under which the University enjoys accreditation as an Australian higher education provider.

The principal governing body of the University is the Monash University Council, chaired by the Chancellor, Mr Simon McKeon AO.

CHANCELLOR (EX-OFFICIO)

Mr Simon McKeon AO

BCom LLB *Melb,* HonDPH *La Trobe* FAICD

Committees of Council membership: ESG and Estates Committee, Executive Committee (Chair), Honorary Degrees Committee (Chair), Membership Committee (Chair), Resources and Finance Committee, Selection and Remuneration Committee (Chair).

PRESIDENT AND VICE-CHANCELLOR (EX-OFFICIO)

Professor Margaret Gardner AC

BEcon(Hons) PhD *Syd,* DUniv *Griffith* FASSA FAIM FAICD

Committees of Council membership: ESG and Estates Committee, Executive Committee, Honorary Degrees Committee, Resources and Finance Committee, Selection and Remuneration Committee.

PRESIDENT OF THE ACADEMIC BOARD (EX-OFFICIO)

Professor Robert Brooks

BEc(Hons) PhD *Monash*

Committees of Council membership: Honorary Degrees Committee.

APPOINTED COUNCILLORS

Mrs Pitsa Binnion PSM

BA Dip Ed, MACE

Committees of Council membership: ESG and Estates Committee.

Professor Gill Callister PSM

BSW(Hons) BA

Committees of Council membership: ESG and Estates Committee, Resources and Finance Committee.

Dr Megan Clark AC

Deputy Chancellor

BSc(Hons) PhD Hon D.Sc *UWA*, Hon D App,Sci. *RMIT,* Hon D.Sc *Macquarie*, Hon LL.D *Monash* FATSE FAICD FAusIMM

Committees of Council membership: Audit and Risk Committee, Membership Committee, Selection and Remuneration Committee.

The Hon Simon Crean*

Deputy Chancellor

BEc LLB HonDLitt *Deakin*

Committees of Council membership: ESG and Estates Committee (Chair), Resources and Finance Committee, Selection and Remuneration Committee.

*Noting that The Hon Simon Crean sadly passed away on 25 June 2023.

Ms Geraldine Johns-Putra

BEc LLB(Hons) *Monash* LLM *Melb*

Committees of Council membership: Audit and Risk Committee, ESG and Estates Committee.

Ms Julie Ligeti *(Resigned 20 June 2022)*

BA LLB *Monash* GAICD

Committees of Council membership: ESG and Estates Committee, Membership Committee.

Mr Peter Marriott

BEc(Hons) *Monash* FCA MAICD

Committees of Council membership: Executive Committee, Resources and Finance Committee (Chair).

Ms Jennifer Samms

BEc *Monash*

Committees of Council membership: ESG and Estates Committee, Honorary Degrees Committee, Membership Committee.

Mr John Simpson

BA *Melb* FCSG MAICD

Committees of Council membership: Audit and Risk Committee, Honorary Degrees Committee, Membership Committee, Resources and Finance Committee.

The Hon Peter Young AM KC

Deputy Chancellor

BJuris LLB *Monash*

Committees of Council membership: Audit and Risk Committee (Chair), Honorary Degrees Committee, Membership Committee, Selection and Remuneration Committee.

STAFF-ELECTED COUNCIL MEMBERS

Ms Catherine McCormick

BMus/BTeach(Hons) *Melb*

Committees of Council membership: Resources and Finance Committee. (*From 1 January 2022 to 31 October 2022)*

Associate Professor Tui McKeown

BA(Hons), MA, PhD *Monash*

(*From 1 November 2022)*

STUDENT-ELECTED COUNCIL MEMBERS

Mr James McDonald

(From 1 January 2022 to 31 October 2022)

Committees of Council membership: Audit and Risk Committee, Resources and Finance Committee

Ms Ishka de Silva

(From 1 November 2022)

SECRETARY TO COUNCIL

Mr Richard Long

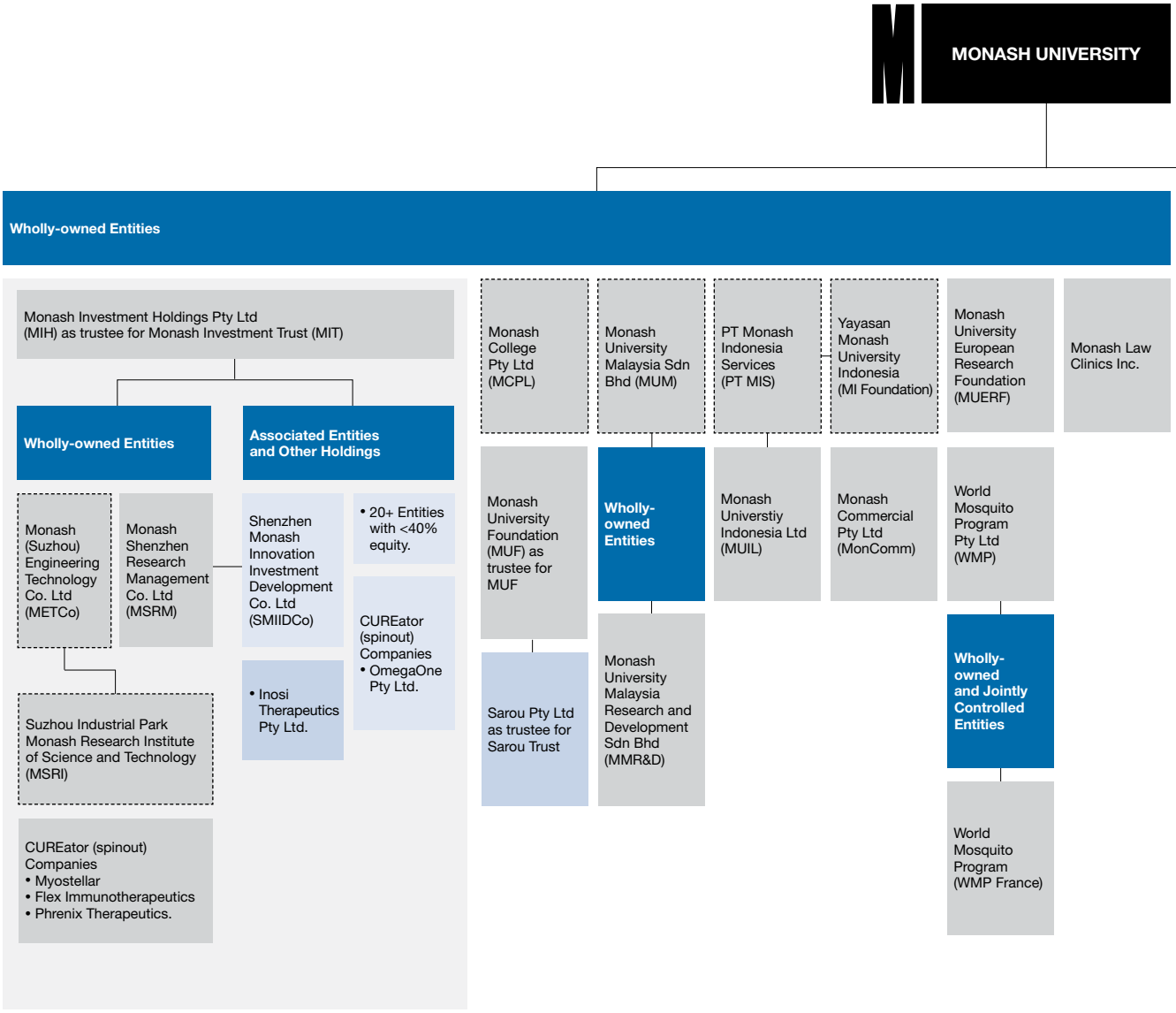
The Council is responsible for the overall superintendence of the University, with specific accountability to the relevant State and Commonwealth ministers under relevant legislation. The Council discharges its role by deliberating on strategies and policies to achieve the University's objectives, and by ensuring the University has in place appropriate and effective governance processes.

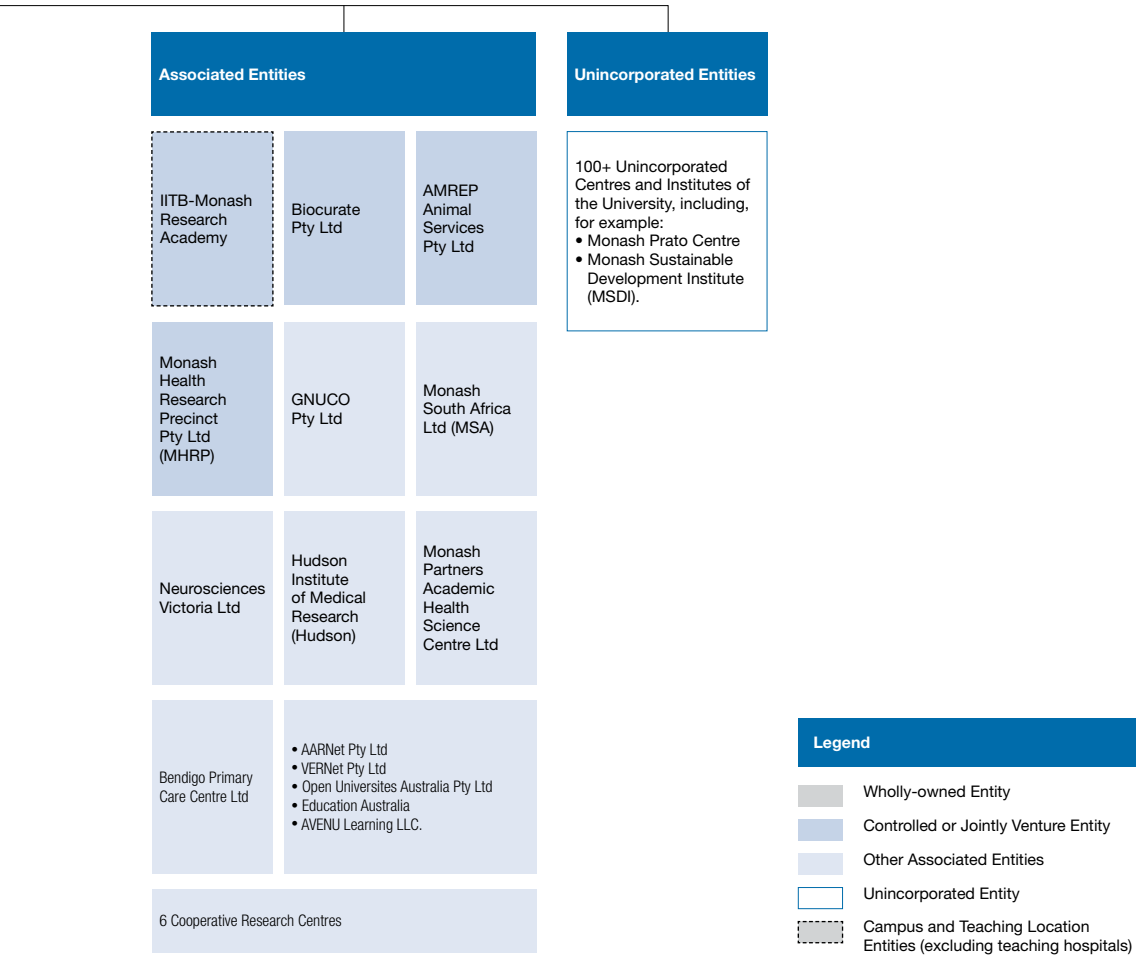
The University has four Australian campuses (exclusive of Monash College), five offshore campuses or learning centres, and has ten faculties and seven portfolios.

OVERALL GOVERNANCE AND MANAGEMENT

MONASH GROUP STRUCTURE

As at 28 November 2022




Associated Entities
Unincorporated Entities
IITB-Monash Research Academy
Biocurate Pty Ltd
AMREP Animal Services Pty Ltd
100+ Unincorporated Centres and Institutes of the University, including, for example:
• Monash Prato Centre
• Monash Sustainable Development Institute (MSDI).
Monash Health Research Precinct Pty Ltd (MHRP)
GNUCO Pty Ltd
Monash South Africa Ltd (MSA)
Neurosciences Victoria Ltd
Hudson Institute of Medical Research (Hudson)
Monash Partners Academic Health Science Centre Ltd
Bendigo Primary Care Centre Ltd
• AARNet Pty Ltd
• VERNet Pty Ltd
• Open Universites Australia Pty Ltd
• Education Australia
• AVENU Learning LLC.
6 Cooperative Research Centres
Legend
Wholly-owned Entity
Controlled or Jointly Venture Entity
Other Associated Entities
Unincorporated Entity
Campus and Teaching Location Entities (excluding teaching hospitals)

REPORTING ENTITIES

The Act requires Monash University to report on all its controlled entities. Due to the size, complexity and geographic diversity of the University's global supply chains and operations, a staged approach has been used to prioritise the deep assessment of entities via our Operational Framework. Over subsequent years, additional entities will be included as we progress down the entity priority list.

Prioritisation of entities (high to low):

a. All entities that would independently qualify to report under the Act, as they are Australia-based and have more than $100 million in revenue: Monash University, Monash University Foundation Pty Ltd, and Monash College Pty Ltd (qualified in 2021)

b. All entities located offshore with more than $100 million in revenue: Monash University Malaysia Sdn Bhd

c. Other entities by revenue, operational size or risk – in the order determined by the Modern Slavery Steering Committee.

Entities were identified with the assistance of the Risk and Compliance Unit and Executive Services. The entities were identified and assessed in relation to the degree of control, revenue, and location.

All controlled entities are within scope of this report, however a staged approach to onboarding has occurred due to the large number of entities. During onboarding each entity is assessed for risk in more detail.

Monash University,^ ABN 12 377 614 012

ENTITY NAME	INCORPORATED IN
Monash University Malaysia Sdn Bhd,^ 199801002475 (458601-U)	Malaysia
Monash College Pty Ltd,^ ABN 64 064 031 714	Australia
Monash University Indonesia Ltd,^ ACN 610 548 144	Australia
Monash University Indonesia Foundation (Yayasan Monash University Indonesia),^ (NIB) 1211000643608	Indonesia
PT Monash Indonesia Services,^ (NIB) 1281001461563	Indonesia
Monash University Foundation Pty Ltd (the Trustee of Monash University FoundationTrust),^ ABN 94 178 965 125	Australia
World Mosquito Program Ltd,^ ACN 654 255 455	Australia
World Mosquito Program (Europe) SAS^ – SIREN 908 337 553	Europe
Monash Accommodation Services Pty Ltd, ABN 34 103 317 826	Australia
Monash Shenzhen Research Management Co, 91440300MA5FLX6Y0L	China
Monash Commercial Pty Ltd, ABN 14 095 891 722	Australia
Monash University Malaysia Research and Development Sdn Bhd, 1157117-M	Malaysia
Monash University European Foundation (MUERF*), 02534860974	Italy
Monash Law Clinics Inc, ABN 90 901 523 080	Australia

^ Entities which have been either completely or partially onboarded.

* MUERF is an independent entity with no higher authority under Italian law; however, Monash University, as the sole member of its highest governing body, the Steering Council, remains accountable for its activities.

OPERATIONS

Monash University has four campuses in Victoria, Australia, as well as international campuses and learning centres in Malaysia, China, India, Italy, and Indonesia.

The University's core activities are education and research. Due to Monash's size and global presence, these are supported by a wide range of student services, as well as global campuses, learning centres and research activities.

Monash University Foundation, which generates investment income for the future benefit of Monash University, is operated from within Monash University in the portfolio of the Chief Financial Officer and Senior Vice-President.

Monash College provides educational programs and services to international and domestic students as well as recruitment services for employers seeking talent.

Monash College is a wholly owned company of Monash University, a registered charity with the Australian Charities and Not-for-profits Commission, and a higher education provider accredited by the Tertiary Education Quality and Standards Agency. Monash College is located in Melbourne, Australia.

Professor Margaret Gardner AC, President and Vice-Chancellor, is responsible for the management of Monash University, (including Monash College), overseeing operations and the University's academic standards.

ACADEMIC STRUCTURE

FACULTIES

1. Faculty of Art, Design and Architecture
2. Faculty of Arts
3. Faculty of Business and Economics
4. Faculty of Education
5. Faculty of Engineering
6. Faculty of Information Technology
7. Faculty of Law
8. Faculty of Medicine, Nursing and Health Sciences
9. Faculty of Pharmacy and Pharmaceutical Sciences
10. Faculty of Science

OPERATIONAL STRUCTURE

The President and Vice-Chancellor is supported by members of the Senior Executive, who are responsible for the strategic direction of the University's activities across the portfolios.

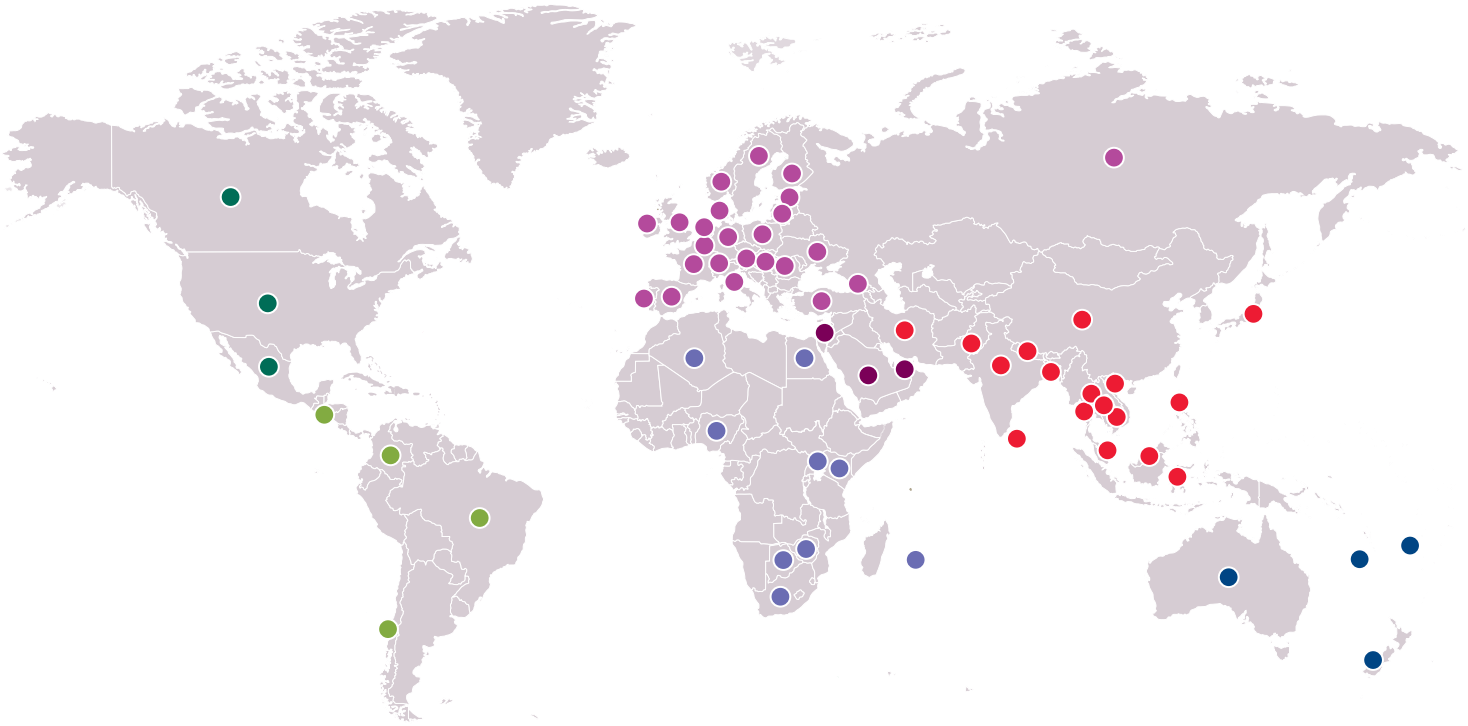
Senior Executive portfolios

- President and Vice-Chancellor
- Provost and Senior Vice-President
- Deputy Vice-Chancellor (Enterprise and Engagement) and Senior Vice-President
- Deputy Vice-Chancellor (Education) and Senior Vice-President
- Deputy Vice-Chancellor (Research) and Senior Vice-President
- Chief Operating Officer and Senior Vice-President
- Chief Financial Officer and Senior Vice-President.

SUPPLY CHAIN

To support our global research and education operations, Monash engages with a wide variety of suppliers. These vary from common goods and services to some of the most specialised suppliers worldwide that support Monash's leading research projects.

Analysis was undertaken of detailed purchase order data for the 2022 reporting year. In 2022, Monash purchased from more than 14,000 suppliers in 64 countries. Of these suppliers, 2400 were new suppliers that were onboarded using the new mandatory modern slavery onboarding process.



NORTH AMERICA

Canada
Mexico
USA

SOUTH AMERICA

Brazil
Chile
Colombia
Panama

AFRICA

Botswana
Egypt
Kenya
Mauritius
Nigeria
South Africa
Uganda
Zimbabwe

MIDDLE EAST

Iran*
Saudi Arabia
UAE
Israel

EUROPE AND RUSSIA

Austria
Belgium
Czechia
Denmark
Estonia
Finland
France
Georgia
Germany
Hungary
Italy
Ireland
Latvia
Netherlands
Norway
Poland
Portugal
Romania
Russia
Spain
Sweden
Switzerland
Turkey
Ukraine
United Kingdom

ASIA

Bangladesh
Brunei
Cambodia
China
India
Indonesia
Japan
Korea
Laos
Malaysia
Myanmar
Nepal
Pakistan
Philippines
Singapore
Sri Lanka
Russia
Thailand
Vietnam

OCEANIA

Australia
Fiji
New Caledonia
New Zealand

*Scholarship related spend.

SPEND AND INVESTMENTS

Monash University spend

IN 2022, MONASH UNIVERSITY SPENT $1.07B
with its suppliers of goods and services.
Of this, $341 million was spent with non-profits such as hospitals, universities, and medical research institutes.

The largest categories of spend were:

- IT Consultancy
- IT technical services
- Lab equipment.

Monash University investments

IN 2022, MONASH UNIVERSITY'S CONSOLIDATED INVESTMENTS TOTALLED $2B
(including Monash University Foundation)

The largest areas of investment were:

- Term deposits
- Diversified yield funds
- Quality short-term money market securities
- Low-carbon global shares
- Investment properties.

Monash University Malaysia spend

IN 2021, MONASH UNIVERSITY MALAYSIA SPENT $21.2M
with its suppliers of goods and services.

The largest categories of spend were:

- IT Software
- Advertising and media
- Lab supplies
- Research equipment.

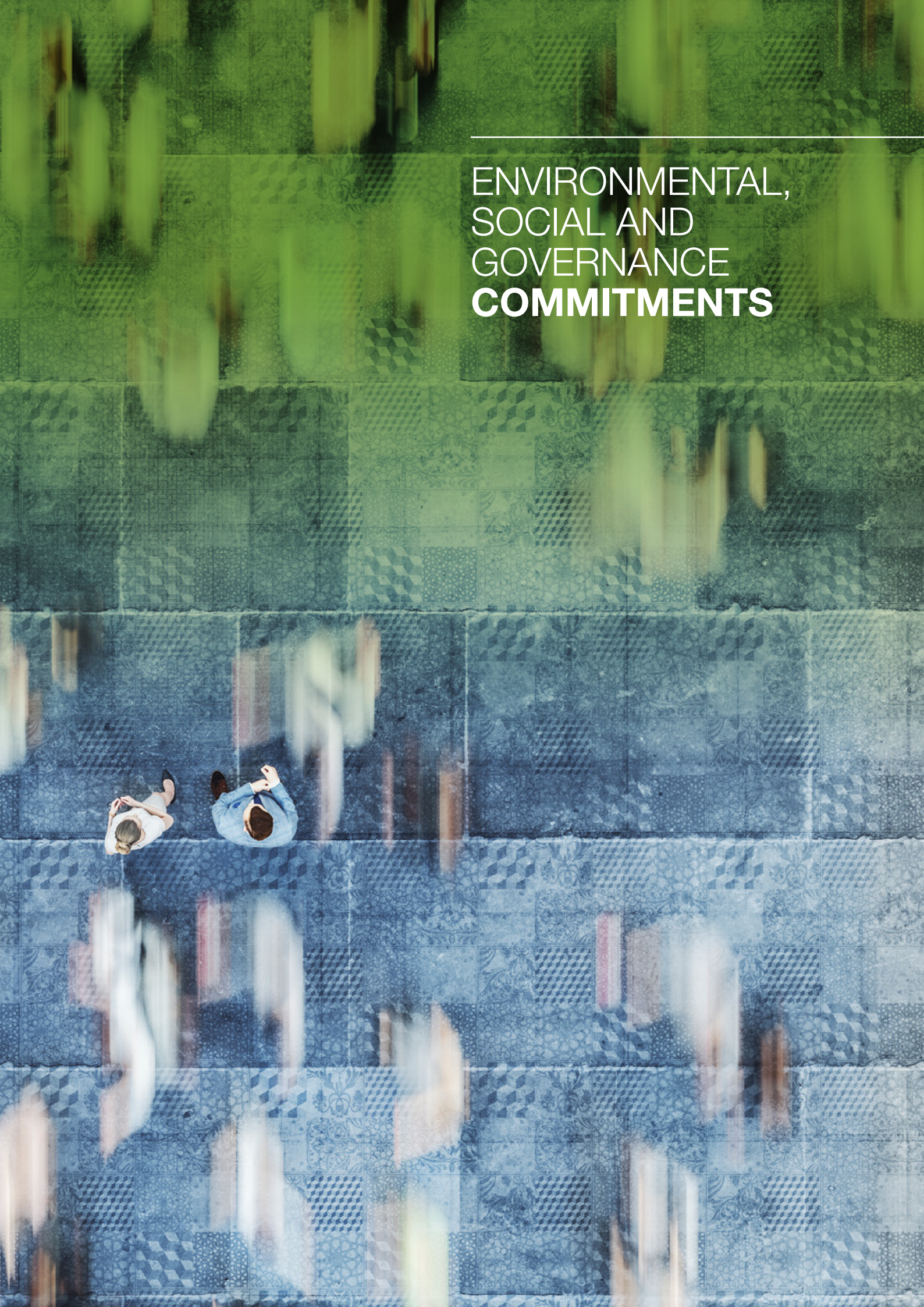
Monash College spend

IN 2022, MONASH COLLEGE SPENT $12M
with its suppliers of goods and services.

The largest categories of spend were:

- Business and management consulting services
- Course development and expert advice services
- Electronic library supplies.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE **COMMITMENTS**



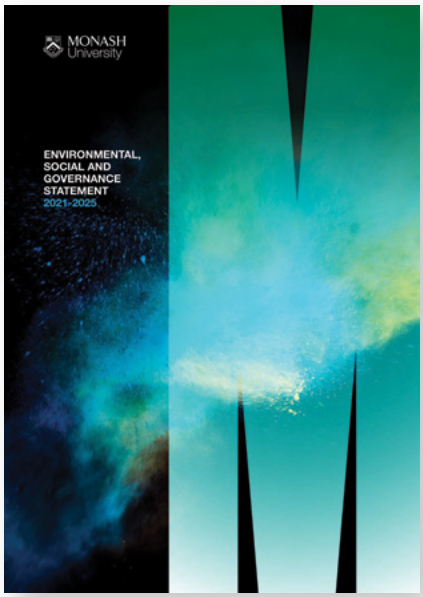
In the pursuit of excellence in sustainability, the University has an Environmental, Social and Governance Statement 2021-2025 approved by the University Council in 2021. The University also has in place a sustainable development framework.

The modern slavery program of work has been integrated into these two initiatives to facilitate a cohesive approach to the critical issues of global sustainability and modern slavery. Progress updates are now provided to the ESG project.

Protecting and promoting human rights is integral to Monash University, and requires a broad framework to cover both operations and our supply chains.

Our commitment to the United Nations Sustainable Development Goals includes that we will:

- support and promote the principles of the Sustainable Development Goals
- undertake research that provides solutions to sustainable development challenges
- provide the educational opportunity for our students to acquire the knowledge and skills needed to promote sustainable development
- contribute to the achievement of the Sustainable Development Goals by ensuring our campuses and major programs are environmentally sustainable and socially inclusive
- report on our activities in support of the Sustainable Development Goals.



ENGAGEMENT

Building a sustainable future is the most pressing challenge confronting communities globally. Governments and industry worldwide are searching for answers to help them meet this challenge. The University will mobilise governments, industry and communities to adopt sustainable practice.

Monash is committed to better leveraging the nexus between the University, industry, government and community to enhance the collective impact. The University will utilise this model to build its international reputation for initiating and accelerating action in areas where it is already established leader, as well as in emerging priorities areas such waste management, waste to energy and the transition to hydrogen.

The priorities are:

- The University will leverage its position as a critical mass of research, education and innovation to attract investment to the Monash Technology Precinct.
- Building on relationships with key stakeholders such as Greater South East Melbourne, the University will establish a participatory process to engage key stakeholders to drive adoption of environmental and social principles in South East Melbourne and further progress collaborative development of local water, waste and energy solutions.
- Momentum is growing for stronger partnerships between Australia and its Pacific neighbours and this is anchored around many priorities that align with ESG. The University will develop a Pacific engagement plan to coordinate its regional efforts to promote action on sustainable practice, social justice and good governance.

MODERN SLAVERY

Monash University supports all efforts to eliminate modern slavery and is committed to delivering a robust, meaningful response to the Modern Slavery Act.

The priorities are:

- The University will leverage its procurement and supply chain operations, its investments and fund managers, as well as research and teaching activities to identify and eliminate slavery risks for its own supply chain as well as leveraging University research to inform governments and civil society strategies to address human slavery globally.
- A comprehensive, multi-year program will be implemented to identify and manage modern slavery risks throughout Monash University's extensive global networks, focusing on high-risk areas, risk reviews, training and awareness, and supporting Monash partners to understand their supply chains.
- A comprehensive structure, including executive oversight committee and working group to leverage deep academic expertise, will be established to support the University's modern slavery program. The program will be dynamic and respond to the changing environment in which Monash operates, reporting annually on steps to:
  - identify slavery risks as they relate to particular activities of the University;
  - understand the specific causal factors which lead to the practices;
  - develop an action plan to remediate (noting the imperative to work with the affected area); and
  - measure the effectiveness of the University's response and actions.
- Monash will utilise its research expertise to develop impact measures that enable the assessment and development of efforts to counter modern slavery and to improve and target these efforts.
- The University will share and communicate research findings that can inform regional and global efforts to eliminate modern slavery. This work is an essential component of the efforts focused on the reduction and eradication of exploitation in all its forms.

GOVERNANCE

The University will explore opportunities to improve its capture and reporting of environmental, social and governance advances.

Monash University makes transformative contributions to some of the most important environmental and social initiatives of our age: as a signatory to the UN Sustainable Development Goals, the UN Global Compact and International Universities Climate Alliance; as host institute for organisations like ClimateWorks, the Sustainable Development Solutions Network Australia, NZ and Pacific Hub and other centres that mobilise adoption of sustainable practice; through pioneering world-class research, and through education programs such as the Global Immersion Guarantee and the Master of Environment and Sustainability. It is time for the University to introduce a more coordinated approach that provides greater transparency of our activities and commitments in these areas, their alignment within the broad mission of the University and how we can continue to improve in them.

The University should seek to introduce a more coordinated approach to the capture and reporting of ESG and SDG advances, capable of providing greater transparency and celebration of our activities and our commitments in these areas, as well as how they fit within the broad mission of the University and how we can continue to improve in them. Enhanced capture and reporting will rely on an increased understanding of the SDG framework with the Monash community. The priorities are:

- Monash will fold ESG monitoring and implementation into the University's business as usual planning, implementation, monitoring and reporting processes.
- The University will find ways to amplify its SDG reporting, for example by a regular report on the impact of its SDG activities, and integrate this with the University's other reporting processes.
- ESG progress and monitoring will be the subject of further consideration by the University Council.

The University will finalise its approach to these steps by the end of 2021.

INVESTMENT

The University will continue to transition its investment portfolio towards carbon neutrality.

Fund managers are increasingly allocating resources to develop products and capture interest in climate aligned and social outcome orientated investments. Monash aims to lead Australian universities in this endeavour, building on its earlier progress to embed responsible investment action and low carbon investment strategies into its investment practices. The University will also recognise and satisfy its corporate responsibilities to manage its finances responsibly and sustainably at all times. The priorities are:

- As a sustainability and social justice pioneer, Monash will work with fund managers to define the pathways that enable it to achieve carbon neutrality across its externally managed investments by 2050. This approach supports the broader University's Net Zero aspirations, while satisfying its fiduciary responsibilities.
- Monash will report annually on its progress to improve the climate alignment of its investments as part of the University's broader responsible investment and sustainable development goals (SDG) reporting processes.

MODERN SLAVERY **GOVERNANCE STRUCTURE**

Monash has a clearly defined governance structure supported by an expert advisory panel to oversee the development and implementation of the modern slavery program of work.

The remit of this structure is to develop, review and refine the University's response to modern slavery within our operations and supply chains.

While the steering committee determines program direction, there is an escalation pathway that utilises the University's management structure. As the modern slavery program of work is managed by Strategic Procurement, escalations are managed from Strategic Procurement to the Chief Financial Officer and Senior Vice-President, who is a member of the Vice-Chancellor's Group.

MONASH UNIVERSITY COUNCIL	**Chair:** Mr Simon McKeon AO
ESG AND ESTATES COMMITTEE	**Chair:** The Hon Simon Crean*
VICE-CHANCELLOR'S GROUP	**Chair:** Professor Margaret Gardner AC
MODERN SLAVERY STEERING COMMITTEE	**Chair:** Director, Strategic Procurement

Strategic Procurement	Office of the General Counsel	Monash Abroad	Faculty of Arts	Faculty of Law
Campus Infrastructure and Services	Risk and Compliance Unit	Monash College	Monash Business School	Monash University Indonesia
Finance	World Mosquito Program	Digital and Student Services	Monash University Malaysia	

MODERN SLAVERY WORKING GROUP	**Chair:** Procurement Strategy and Governance Manager

Strategic Procurement	Office of the General Counsel	Monash Abroad	Monash Malaysia	Monash College
Buildings and Property Division	eSolutions	Monash Retail	Risk and Compliance Unit	World Mosquito Program

*Noting that The Hon Simon Crean sadly passed away on 25 June 2023.

IDENTIFYING RISKS IN OUR **OPERATIONS AND SUPPLY CHAIN**

With such large-scale and global operations, more than $2 billion in investment portfolios and cash equivalents, and more than $1 billion in annual spend with suppliers, Monash acknowledges there is the potential to cause, contribute to, or be directly or indirectly linked to modern slavery risks in its operations and supply chains.

RISK IN OPERATIONS

University operations include more than 86,000 students supported by more than 8400 staff across five countries. Each country has specific labour practice laws and obligations. At-risk groups both domestically and overseas include vulnerable populations due to job insecurity, economic hardship, cultural practices, literacy and language issues, or the lack of knowledge about local laws. Any of these can contribute to increased risk of exploitation.

There are two key operational risks for Monash

Recruitment practices for both staff and students

- Monash University works to ensure all recruitment activities actively avoid risks for staff and students (including international students) in relation to servitude, forced labour, debt bondage in a homestay environment, and in their search for employment. Monash University has developed rigorous policies, processes and monitoring to identify and avoid such risks. Monash is satisfied that our current set of relevant HR policies, procedures and student services programs are addressing these risks and will continue to improve as we learn.

Procurement practices

- Monash recognises our operations can impact our direct suppliers with potential flow-on effects to downstream suppliers that may in turn facilitate or incentivise modern slavery practices such as forced labour, debt bondage, and slavery.
- This supply chain influence from operations arises from:
  - planned or unplanned business drivers such as last-minute purchasing or unexpected demand placing undue pressure on the market
  - internal stakeholder requirements or expectations
  - procurement practices including contract terms, negotiated pricing, and requested tender response or delivery timeframes.

These may drive counterproductive behaviours or expectations across the University, including:

- setting unreasonable delivery or response timeframes
- acceptance of, or actively seeking, unreasonable below-market pricing
- seeking unreasonably high investment returns
- investing or purchasing from known high-risk industries or countries without relevant due diligence
- the acceptance of ambiguous responses to modern slavery information requests in tenders
- the acceptance of multi-level subcontracting without sufficient due diligence.

Any of these operational practices may indirectly increase the risk of illegal or unsustainable business practices, including labour exploitation, in order to satisfy demand created by the University.

These risks will need to be assessed and, if necessary, addressed via education and changes to policies and processes.

INSIGHTS INTO OUR WORKFORCE

Workforce Disclosures (December 2021 – December 2022)

	DECEMBER 2022							DECEMBER 2021						
	ALL EMPLOYEES		ONGOING			FIXED TERM AND CASUAL		ALL EMPLOYEES		ONGOING			FIXED TERM AND CASUAL	
	NUMBER (HEADCOUNT)	FTE	FULL-TIME (HEADCOUNT)	PART-TIME (HEADCOUNT)	FTE	NUMBER (HEADCOUNT)	FTE	NUMBER (HEADCOUNT)	FTE	FULL-TIME (HEADCOUNT)	PART-TIME (HEADCOUNT)	FTE	NUMBER (HEADCOUNT)	FTE
GENDER														
Women Executives	8	8	0	0	0	8	8	11	11	1	0	1.00	10	10
Women (total staff)	**5898**	**4815**	**2114**	**562**	**2503**	**3222**	**2313**	**5573**	**4551**	**1936**	**562**	**2329**	**3075**	**2223**
Men Executives	11	11	2	0	2.00	9	9	14	14	1	0	1.00	13	13
Men (total staff)	**4184**	**3614**	**1708**	**113**	**1772**	**2363**	**1841**	**4110**	**3544**	**1643**	**99**	**1702**	**2368**	**1843**
Self-described Executives														
Self-described (total staff)	**17**	**13**	**5**	**1**	**6**	**11**	**8**	**6**	**6**	**2**	**0**	**2**	**4**	**4**
AGE														
15-24	474	257	14	2	15	458	242	311	154	3	2	4	306	150
25-34	2166	1731	483	49	515	1634	1216	1958	1,524	365	36	390	1557	1134
35-44	3101	2701	1186	256	1363	1658	1337	3026	2,635	1103	228	1262	1695	1374
45-54	2388	2097	1180	209	1322	999	775	2383	2,086	1122	230	1282	1031	803
55-64	1497	1311	772	117	848	608	462	1482	1,305	770	116	848	596	457
Over 64	474	346	192	43	216	239	130	529	398	218	49	246	262	152
Total employees	**10,099**	**8442**	**3827**	**676**	**4281**	**5596**	**4161**	**9689**	**8101**	**3581**	**661**	**4032**	**5447**	**4069**

Notes:

- Last Pay Period Date: 2021 – 17/12/2021 and 2022 – 16/12/2022
- Dataset includes active paid staff members as at the last pay period date (Monash University Australian payroll staff only)
- Staff on unpaid leave has been excluded from the dataset
- Active casual/sessional staff members who did not work has been excluded from the dataset
- All roles covered by Monash enterprise agreements have been classified consistently with the Monash Enterprise Agreement (Academic and Professional Staff) 2019, the Monash University Enterprise Agreement (Trades and Services Staff—Building and Metal Trades Staff) 2009 and the Monash University Enterprise Agreement (Trades and Services Staff—Catering and Retail, Cleaning and Caretaking and Miscellaneous Services Staff) 2005. The University has a suite of policies and procedures that govern recruitment, selection and employment at the University. These are consistent with employment standards and provide for transparent operational governance, fair treatment and a commitment to a culture of integrity and professionalism with equity, diversity and inclusion being key pillars of these policies and procedures
- The variation in the 2021 workforce disclosure figures from the figures disclosed in 2021 Annual Report are due to reporting errors occurring in the development of figures for the 2021 Annual Report. The workforce figures for previous years have been validated as a true and accurate representation of the reporting requirements. The increase in the University's full-time equivalent workforce was the result of strong growth in external research funding, and the transition of staff to more secure forms of employment
- Workforce figures are derived based on the Department of Education and Training definition which requires active staff numbers for the relevant pay period of the year. This may result in discrepancy in workforce figures across the year.

Student enrolment (headcount) by attendance type and coordinating campus: 2018-2022* data

CAMPUS	STUDENT ATTENDANCE TYPE	YR2018	YR2019	YR2020	YR2021	YR2022
Caulfield	Full-time	18,707	19,727	16,757	15,042	13,786
Caulfield	Part-time	2335	2123	2314	2317	2402
Sub-total		**21,042**	**21,850**	**19,071**	**17,359**	**16,188**
Clayton	Full-time	35,296	37,312	38,941	40,405	36,893
Clayton	Part-time	8492	8967	10,184	12,040	12,473
Sub-total		**43,788**	**46,279**	**49,125**	**52,445**	**49,366**
Gippsland	Full-time	378	385	398	394	402
Gippsland	Part-time	20	9	4	2	1
Sub-total		**398**	**394**	**402**	**396**	**403**
Parkville	Full-time	1415	1437	1436	1600	1,755
Parkville	Part-time	651	627	595	539	483
Sub-total		**2066**	**2064**	**2031**	**2139**	**2238**
Peninsula	Full-time	3689	3731	3659	3519	3233
Peninsula	Part-time	671	661	632	716	726
Sub-total		**4360**	**4392**	**4291**	**4235**	**3959**
Total		**71,654**	**74,979**	**74,920**	**76,574**	**72,154**

Notes:
- 2022 data are preliminary as of 10 January 2023
- Enrolment figures based on full-year data reported to the Department of Education
- Does not include students enrolled on overseas campuses or offshore partners
- Monash University transferred its Gippsland campus to become part of Federation University Australia on 1 January 2014. Monash ceased making offers to new students, and has made arrangements with Federation University Australia regarding teaching its continuing students. One Monash offering – the MBBS medicine course – will continue to admit Monash students at Gippsland.

Source: Enterprise Intelligence and Insights, government Department of Education submission data.

RISK IN SUPPLY CHAIN

Monash University engages with a mix of resellers, head contractors and direct providers in our procurement of goods, services and works. Depending on the nature of the procurement and its associated supply chain, Monash may contribute or be directly linked to modern slavery risks.

Supply chains involving multiple layers of international suppliers inherently carry higher risks, and can include various forms of modern slavery practices depending on the type of raw materials, components, and the countries involved in the supply.

For goods procurement and construction in particular, the risks of modern slavery are often hidden in the supply chain, potentially one or more steps beyond the University's visibility into its supply chain. While Monash may be indirectly linked to the risks that exist at the raw material and/or manufacturing levels, our current ability to identify our risks may be restricted by purchasing those products through a reseller or head contractor.

Where the supply chains are shorter and predominantly based in the countries in which we operate, Monash may be in a better position to minimise our contribution to the risks through responsible procurement practices, education, and contract management.

Where the delivery of goods, services and investment outcomes includes the use of both direct and downstream labour from vulnerable communities, any exploitative practices in the engagement of that labour by third parties or their downstream suppliers may be indirectly attributable to the demand created for goods, services or investments by Monash University.

As shown in "Risk in operations" above, Monash has identified some business practices that may position suppliers as vulnerable and increase the risks within their business or supply chain.

The University, both directly and as part of the Australian University Procurement Network (AUPN), has discussed modern slavery with a number of common suppliers as part of a consultative process.

Monash recognises that our operations and supply chains are complex and understands that there will be unforeseen circumstances and challenges that lie ahead as we address modern slavery risks. We are focused on understanding the existing risks more deeply, and are exploring ways to address them.

We will continue to collaborate with our peers, our suppliers, and our external affiliations, as well as draw on the extensive knowledge of our academic experts and insights from other industries to develop meaningful solutions for the identified risks. The actions described below will be reviewed and fine-tuned as knowledge comes to hand.

CASE STUDY 01: REDUCING RISK IN ELECTRONICS HARDWARE

While the IT hardware supply chain is fast-paced and at times opaque, it provides critical products and services to the University.

THIRD PARTY AFFILIATION IMPROVING TRANSPARENCY

To increase transparency in our IT electronics supply chain, the University has engaged with Electronics Watch, a leading not-for-profit that brings together public buyers in an effort to independently monitor and improve human rights in the IT hardware industry.

Electronics Watch maintains a database of final assembly factories for many products and seeks to improve the transparency of those factories utilising the support of affiliates.

Electronics Watch uses in-country and partnership models to monitor factories. The model used is to build trust and transparency across the supply base.

The University implemented a two-step and integrated approach to electronics purchasing:

1. Current baseline: The University initially supplied a list of its common IT hardware to Electronics Watch, and received in return a detailed spreadsheet of final assembly locations for our products and any known issues regarding those locations. This list covered hardware currently in use
2. New models: The University's eSolutions department updated its Buying New Hardware process to include a step for sending the new hardware details to Electronics Watch and receiving a reply. This process is predominantly used for planned volume IT purchases and allows IT purchases to be checked before a buying decision is made.

In 2022, 20 model numbers were assessed.

Where a product's final assembly factory is not known to the University, Electronics Watch can seek the missing information from suppliers – this occurred in six instances.

If Electronics Watch are familiar with the factory but have a known issue such as missing information on that factory or poor factory engagement, Electronics Watch may ask its members, as buyers of that product, to assist in obtaining that information or drawing attention to the issue. This occurred in nine instances in 2022. Though these concerns do not directly indicate modern slavery, they do cause concern and raise the risk potential, and justify increased focus by Electronic Watch and the University to reduce that specific risk with each factory by trying to improve transparency, initially through improved communications.

The Electronics Watch affiliation allows proactive and ongoing monitoring of risk in our key electronics purchasing. It supports informed decision-making, and includes a two-way feedback loop so that Electronics Watch and the University can continue to drive transparency in this traditionally opaque industry.

IT hardware is the University's first high-risk area with active risk pre-identification, mitigation and ongoing monitoring steps in place. This is initiated as part of Monash eSolutions' new internal process step, with timely insights provided by our Electronics Watch affiliation.

The University is aware of the high velocity within the IT industry, and that it demands ongoing vigilance. The solution currently being implemented allows for an increase in supply chain transparency as early as possible. Initial results show that, in some instances, it is possible to have supply chain modern slavery insights at the earliest stages of product/service purchasing consideration, well before buying processes or approaches to market commence.

The additional supply chain transparency now in place supports a more informed approach to market and may also influence initial demand formation. By having better knowledge earlier in the buying process, the University can engage and influence the industry positively, rather than simply avoiding the issues by buying alternate products, which does little to change practices.

CASE STUDY 02: SUPPLY CHAIN RISK ASSESSMENT, INVESTIGATION AND ACTION – SOLAR PANELS

This case study describes a risk assessment of buying solar panels.

RISK ASSESSMENT

There is widespread concern about the supply chain for solar panels[1]. This includes the raw solar-grade polysilicon production as well as some areas of assembly and panel production.

There has been an increased focus on solar panels with the United States blocking some imports and/or demanding additional information to reduce the risk prior to allowing importation.

The primary concern is forced labour[1]. Approximately 95 per cent of the world's panels depend on polysilicon, with the Uyghur Autonomous Region supplying 45 per cent of the world's solar grade polysilicon. Furthermore, there are suggestions that related panel manufacturing and solar cell component assembly may be implicated.

Antislavery.org has reported[1] that all four of the region's largest polysilicon manufacturers are involved with forced labour directly or indirectly through their sourcing of raw materials. The four largest solar panel suppliers in the world buy from at least one of these polysilicon manufacturers.

Solar, at what cost?

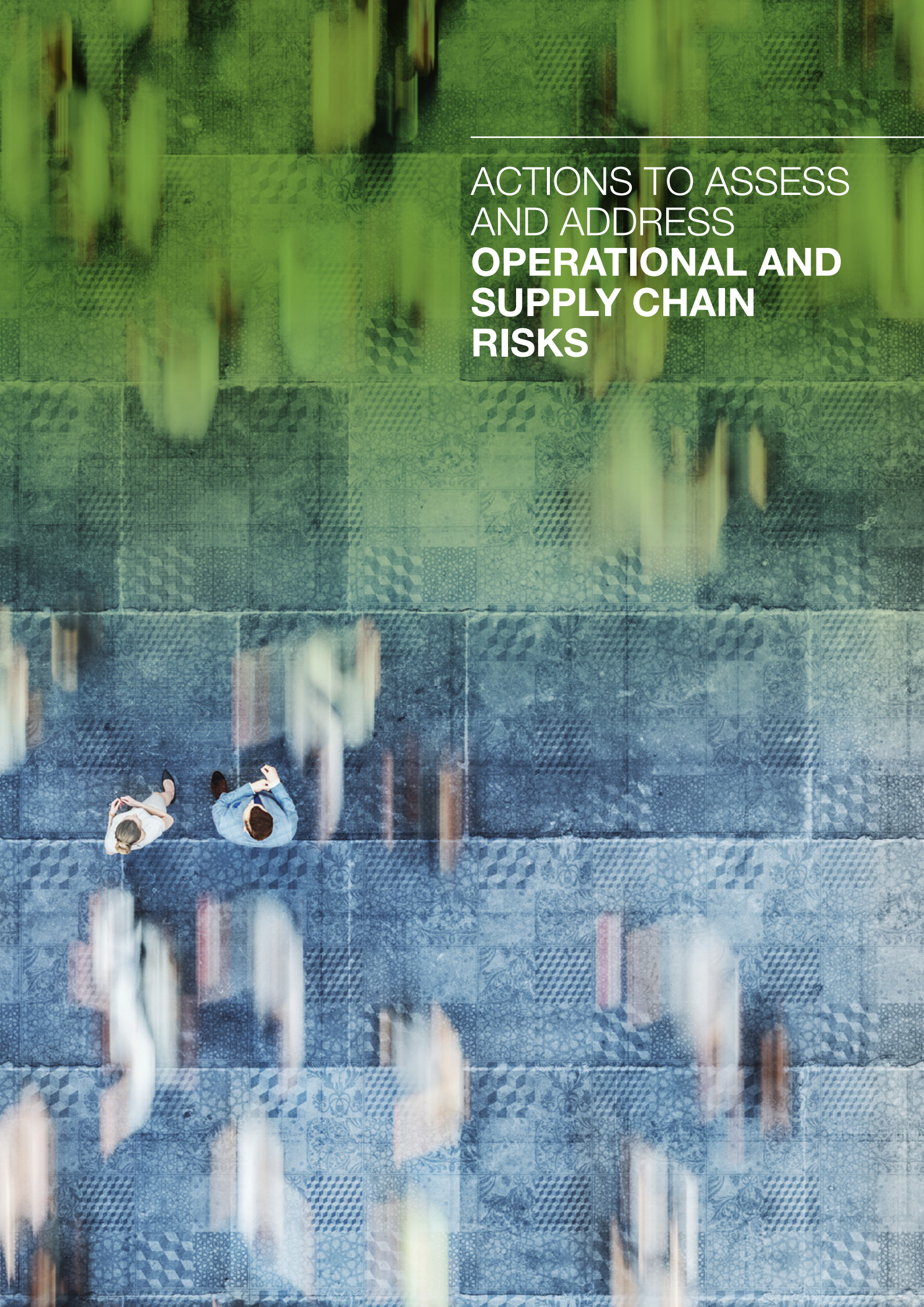
The University obtains approximately 95 per cent of its power from wind turbine generation and has deployed solar panels at key locations to augment supply.

As part of the due diligence undertaken into solar, the University has mapped proposed panel model numbers and their supply chains as far back as possible - to panel construction, component assembly, and raw polysilicon manufacturing.

At this time, all panels proposed by our supplier have been traced back to raw polysilicon sources of concern, which may also include sub-component assembly of concern.

As the project progresses, various panel types have been proposed by our supplier. The University will continue to work with its supplier to identify and assess any proposed panels to better understand the risks and options. Progress is regularly discussed in the Modern Slavery Working Group and Steering Committee, and insights learned from any intended solar panel purchases will be provided to the Building and Property Division prior to making purchasing decisions. This work is ongoing.

1. **www.antislavery.org/solar-panel-industry-uyghur-forced-labour/** accessed 24 November 2022.



ACTIONS TO ASSESS AND ADDRESS **OPERATIONAL AND SUPPLY CHAIN RISKS**

OPERATIONAL RISKS

Recruitment practices

One of the key operational risks for Monash relates to recruitment practices for both staff and students. Monash works to ensure all recruitment activities actively avoid risks for staff and students (including international students) in relation to servitude, forced labour, debt bondage in a homestay environment and in seeking employment. Monash has developed rigorous policies, processes, and monitoring practices to identify and avoid such risks. Monash is satisfied that our current set of relevant HR policies, procedures, and student services programs address these risks, and we will continue to improve them as we learn. These are described below.

All Monash University employees are engaged via employment instruments that meet or exceed Australian legal requirements. Monash Human Resources (HR) maintains and manages these agreements, is involved in the engagement of all staff, and has robust hiring practices in place. This includes fair recruitment and hiring processes, as well as conditions of work and behaviour in the workplace requirements. Monash HR practices are subject to audit.

Monash staff and students have clearly prescribed rights through readily available policies and websites. Bullying, discrimination, harassment (including sexual harassment), victimisation and vilification are unlawful and are not tolerated.

In addition to policies setting out the requirements and rights of all staff and students, Monash has a number of easily accessible complaint and grievance processes. This includes clear identification, explanation and access to both internal and third-party complaint avenues, anonymous complaint handling, and set timeframes for complaints to be addressed before escalation.

Monash College has robust recruitment processes that includes working rights and qualification checks, and verifying that all employees are above minimum working age in line with relevant Australian employment legislation.

In 2021, Monash College updated its Recruitment and Selection Policy and Procedure to include reference to modern slavery and associated legislation. The internal audit of staff recruitment was deferred until 2023 due to staffing shortages.

Periodically, the College engages with third-party recruitment agencies and consultants. Where possible, the College utilises the University's preferred suppliers. The network of homestay hosts and education and migration agents is subject to a recruitment and vetting process which is actively monitored and managed according to Monash College policies and procedures.

It was identified that students, particularly international students, may be at risk in the early phase of their careers – even though this employment is not formally part of University operations or supply chains in many cases. Within Australia, to reduce employment-related risk for students, the Group Manager Career Connect and Graduations has the Career Connect program in place which educates students by providing employability workshops, workplace rights advice such as tax, residency status, work conditions, pay rates, Fair Work Ombudsman, and Fair Work links. This important information is shared with student organisations and cohorts at each campus.

The modern slavery program undertakes an annual check with the Group Manager, Career Connect and Graduations who now have responsibility to maintain ongoing awareness of the Career Connect program and its proactive management of this risk. This year included the release of a "Working in Australia" module to educate students on worker rights, entitlements and obligations.

The risk from student employment within Australia with third parties is now considered to have a comprehensive education, risk mitigation program and grievance mechanism in place. It is actively managed by the Group Manager, Career Connect and Graduations. Additional work is underway to extend similar support to Monash University Malaysia and Monash University Indonesia.

Procurement practices

As a leading institution in the higher education sector, Monash is committed to educating our staff and students on the challenges and opportunities of the human rights agendas, and Monash's academic expertise is central to meeting this commitment.

In consultation with our academic experts, Monash developed and launched a procurement-focused modern slavery training module at the end of 2021. The training aims to raise awareness of hidden slavery practices in supply chains and signs of potential issues. In the first stage of deployment, the training was assigned to staff with significant procurement responsibilities. Further deployment to all staff with procurement responsibilities and all new staff occurred in 2022.

As part of our continuous improvement work, in 2022:

- Modern Slavery Steering Committee
- Modern Slavery Working Group
- The most senior University staff were also added to our key staff list for training and will be reported on as a KPI in our next report.

For more than 200 staff in hands-on contract and commercial roles, face-to-face training courses were undertaken for risk identification as well the implementation of the new contract clauses and sourcing templates from a combined procurement and legal perspective across:

- Finance
- Office of the General Counsel,
- Buildings and Property Division,
- eSolutions, and
- Monash College ahead of the updated clauses rollout.

A staff guide for risk review and risk rating selection was also produced and distributed upon request.

Monash also has a mature procurement framework in place, including a value and risk-based approach to procure goods and services, detailed policies, standardised templates, governance, separation of duties, training and auditing.

Our procurement policies and procedures, as well as sourcing document templates, provide detailed guidance to staff on responsible procurement practices, such as allowing sufficient time for procurement planning, clear specifications, setting realistic expectations, ethics, confidentiality, and probity.

The Strategic Procurement team, which leads the implementation of the modern slavery program of work, also completes the Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply eLearning program and test on an annual basis.

Further work will be carried out to identify and improve potential undue pressures that may be placed on our supply chain as a result of setting short delivery times or unreasonable results. These may occur due to individual or business practices or expectations.

SUPPLY CHAIN RISKS

Considering the wide spectrum of goods, services and works Monash procures, and the extensive network of both domestic and global suppliers, we expect most forms of modern slavery may exist to varying degrees and at various stages along our supply chains, particularly where low-skilled and vulnerable migrant workers are involved, and where conflict or political instability exist.

Our approach to mitigating these risks is through creating awareness and asserting influence through supply chain risk analysis, sourcing, contractual instruments, and training.

RISK ASSESSMENTS

Assessing risk in Australia

- Our risk assessment methodology is multi-pronged and dynamic. Each year, we utilise the latest Department of Homeland Affairs and Global Slavery Index advice for high-risk focus areas for Australian imports. We also use our spend-based risk assessment system created via our work with AUPN, with additional guidance provided from our academic experts.

Assessing risk in countries outside Australia

- We utilised the Global Slavery Index for identifying high-risk imports to Malaysia, and will expand to include the countries we operate in over time as we expand our scope to include additional offshore entities in subsequent years. During the onboarding process for Monash University Malaysia, it was noted that the Global Slavery Index also highlighted that Malaysia is a country of concern in relation to labour rights, identifying that beyond imports to Malaysia, local practices may be of particular concern.

Preparations undertaken for the wider deployment of an advanced supplier risk assessment system

- Our new third party system will complement the industry and country-based risk assessment system currently in place. It currently provides a significant global supplier database, product material breakdown data, and news monitoring service with alerts related to our suppliers.
- The new system also allows the potential for risk identification and management at the Higher Education Sector level across all participating universities.
- After a limited supplier trial, the AUPN received feedback that a more simplified approach to questionnaires would be beneficial. Additional work is being undertaken on streamlining questionnaires before they are used more widely across our supply base.
- Once we start to deploy supplier questionnaires more widely, the system has the potential to reduce the workload for common suppliers between universities by allowing an efficient reply once, share to 30-plus universities approach to modern slavery information requests from the sector.
- Periodically we refresh the data to ensure the system provides us the latest view of our supply chain.

Spend-based risk assessment

- An assessment of spend against known high-risk countries and categories was undertaken in 2022 with the outcomes below. A key outcome is that our supply chain risks predominantly lie in the types of goods and services procured rather than where we procure from, and that we have a small number of suppliers that account for the majority of spend in high-risk categories. This has informed our approach to address the risks by directing efforts to high-risk categories and, more specifically, the high-spend suppliers within these categories.

SUPPLY CHAIN RISKS SUMMARY

11 HIGH-RISK COUNTRIES WITH SPEND

(China, India, Bangladesh, Laos, People's Democratic Republic of Pakistan, Vietnam, Thailand, Malaysia, Sri Lanka, Cambodia, Afghanistan)

128
SUPPLIERS

$5.78M
COMBINED SPEND

80%
of the spend is concentrated with **20** suppliers

- Most of the spend is on lower-risk professional support services in those counties, such as auditing, research, and marketing. One key exception is chemicals, which may include some that could be high-risk, especially at the raw materials extraction stage – though the location of extraction may be in another country
- These figures include some scholarship and research-related spend, and excludes some Monash-related entity spend
- Iran may be considered as low-risk and excluded as it is a scholarship-related spend.

6 HIGH-RISK CATEGORIES

(Cleaning services, electronics, security services, retail leases, apparel, solar panels)

1702
SUPPLIERS 8 COUNTRIES

$72.9M
COMBINED SPEND

80%
of the spend is concentrated with **6** suppliers

- Taking into consideration our proximity to the risk, bargaining power, supplier dependency, availability of alternative suppliers, and level of spend, each of these categories is either being addressed via a specific action or has an action plan in place. These are discussed further in the "Areas of focus" section.

SOURCING PROCESSES

Monash has both short-term tactical and longer-term strategic engagements with suppliers. Significant purchases follow a formal tendering process unless a formal exception is sought and granted by Strategic Procurement.

As part of this tendering process, suppliers are required to provide information in their response related to environmental and social responsibility. The information requested regarding social responsibility includes specific mention of modern slavery within the supplier and its supply chain, information regarding compliance, and the supplier's actions taken to address modern slavery. The information requested within standard tender templates including contract templates has been updated. This was supported by training of relevant staff including purchasing, commercial, procurement and legal staff. Additional updates of these document sets will occur as the Procurement Framework, Supplier Code of Conduct and Reporting Procedure are being prepared for release.

NEW SUPPLIER ONBOARDING

All new recurring suppliers to Monash University Australia must confirm they are compliant with relevant modern slavery requirements in order to proceed through Monash's supplier onboarding (supplier creation) process. A supplier that has not successfully been through this process is not able to be ordered from or paid. Approximately 2400 supplier records were created through this process in 2022.

Additional due diligence is conducted in the supplier selection process for contracts assessed as being high-value and/or high-risk. Monash assesses information from potential suppliers through these processes including:

- the company's modern slavery statement
- answers to a range of specific modern slavery questions
- details on their practices and other relevant information.

Contracts with these suppliers are then supported through a framework of template modern slavery clauses which have been developed for use based on the risk profile of the goods and services being procured.

The University has low-risk and high-risk tender and clause templates. Commercial and legal staff have received training and supporting quick guides, and will have ongoing assistance for modern slavery risk assessment of tenders and agreements. Commercial and legal staff may use the corresponding templates after the risk level has been determined.

CONTRACT AND SOURCING DOCUMENT TEMPLATE WORDING

A framework of template clauses has been created and deployed by Strategic Procurement, an academic expert, and the Office of the General Counsel for implementation in key documents where Monash is procuring goods or services, including sourcing documents and relevant template agreements.

The template clauses include:

- "low-risk" provisions for general use
- "high-risk" provisions applicable to high-risk suppliers or procurements
- specific terms related to electronics hardware.

The "low-risk" provisions require suppliers to identify, assess and address modern slavery risks within their operations and supply chain, and subsequently notify Monash of any instances of modern slavery practice. They also provide the right for the University to terminate any arrangements with the supplier in the event they have failed to rectify and default in their obligations under the provisions or have provided the University with false or misleading information.

The "high-risk" provisions place additional obligations on suppliers to provide a detailed report on their efforts in identifying, assessing, and addressing modern slavery risks, as well as to request their downstream suppliers to comply with similar conditions. Where risk is deemed to be very high, an inspection provision can be added to enable Monash or its nominated agent to conduct investigations.

The "electronics hardware" terms are used in addition to the "low risk" or "high-risk" and to specifically address the procurement of electronics. They authorise University-appointed third parties (in particular, Electronics Watch and its affiliates) to undertake physical inspections of factories, interview employees and inspect records of factories.

These clauses are approved and have been implemented in the various templates by the Office of General Counsel.

TRAINING AND COMMUNICATIONS

The training module was developed and continues to be deployed using real-life scenarios to create awareness among staff with procurement responsibilities.

The publicly accessible Monash University modern slavery website is the homepage for the University's modern slavery program of work. This website will host the annual Modern Slavery Reports as they are published, outline our approach to tackle modern slavery, and provide additional educational resources. Its content will grow as the program progresses. There is also a Monash College modern slavery website.

An integrated digital communications campaign using both internal and social platforms is being implemented as the program continues. This campaign includes social media and web-based communications, and aims to raise awareness, promote discussion, and provide additional skills and information on the issue to staff and students.

AREAS OF FOCUS

Using risk assessments, supplier questionnaires, industry, and academic knowledge, Monash has identified the following areas within its supply chain that are of higher potential risk. We have increased our focus on these areas.

Cleaning services

- Monash incurs significant cleaning services expenditure due to the size of its various campuses. There are 60 suppliers and a concentration with one supplier
- Due to the higher proportion of low-skilled, temporary and/or migrant workers employed in cleaning services, we acknowledge that the risk of forced labour and debt bondage may exist within the labour practice of our suppliers. As a significant customer, we are mindful of the demand our service requirements place on the suppliers, which may contribute to malpractice. Monash will continue to engage our suppliers in an open dialogue about our expectations regarding labour practice, and work with third-party experts where practicable to understand where we may improve our practices and increase supply chain transparency
- In Australia, Monash engages its cleaning services via third-party service providers that are only engaged after a robust tendering process. Terms and conditions are made binding via comprehensive formal agreements. Further subcontracting of the work is only permitted with the approval of Monash University
- Despite these measures, Monash has identified cleaning services to be an area of potential modern slavery risk. Though there is no evidence to indicate any issues among our current suppliers, we have continued to assess the potential to improve transparency and further reduce risk.

Security services

- Monash has a material spend on security services. There are 31 suppliers with a heavy concentration with one supplier.
- Security services have a similar risk profile to cleaning services. Monash's spending is also significant in this area. We will adopt a similar approach to cleaning services to address the risks
- As part of our prioritised risk approach, a deep-dive into this area will occur in subsequent years. Currently, the concentration with one key 'tier one' supplier allows us to apply a focused approach to work closely with this supplier. However, this is not considered to be a comprehensive approach and it may be improved
- Offshore entities will be considered when they are risk-assessed.

Computers and electronic equipment – including related conflict minerals

- Monash procures and incurs significant costs on electronics. The supply base is diversified with over 300 suppliers, but continues to have a concentration of expenditure with a handful of global suppliers.
- Electronics have high-risk and complex supply chains, from raw materials and component manufacture to primary assembly of the device, where modern slavery can occur at multiple stages along the supply chain. Risks include forced labour, the worst forms of child labour, slavery, human trafficking, and debt bondage. Supply chain transparency is generally opaque and the entities within the supply chain may also be commercially sensitive
- Despite the large spend, Monash is likely to be a relatively small buyer to our global suppliers. While we may often buy directly from original equipment manufacturers (OEMs), our influence on their supply chains would be limited due to proximity to risk and bargaining power considerations. Our relationship with the risk in electronics is directly linked
- The current focus is on increasing the transparency of the primary assembly location for all relevant products Monash purchases, which is typically an offshore factory assembling the final components into branded products on behalf of OEMs

- In the first year of our program, Monash engaged one of its key computer suppliers and reviewed its approach addressing risks of modern slavery in its supply chain. The supplier was found to be well-advanced in this area. Though satisfied with the actions of this key electronics supplier, Monash considers this industry to be of particular risk, and in 2022 undertook the following steps to improve transparency:
  - Monash has been working closely with a third-party global monitoring and compliance entity, Electronics Watch, is an affiliate, and now benefits from increased transparency in our IT hardware.
- Our ongoing risk management strategy includes using contract terms, third-party monitoring and sector leverage through AUPN and Electronics Watch's extensive network of affiliates. Each of Monash's offshore controlled entities will be integrated into our electronics risk mitigation strategy once they reach that stage of onboarding.

Cotton and apparel

- The expenditure of Monash's Australian campuses within this industry are comparatively low compared to the other high-risk areas, but the risks are real. There are now 20 suppliers, with a concentration of spend across eight suppliers. It is possible there are additional small suppliers not identified by category-based spend analysis such as incorrect coding of small one-off orders or purchases made by credit card
- Similar to electronics, the supply chains of apparel tend to be long, complex, opaque and global in scale. The risk profiles between apparel and electronics are similar. Where raw materials supply and/or manufacturing occur in countries known to have human rights violation issues, the risk level increases. Due to proximity to risk, low spend and restricted visibility of supply chains, our relationship with the risks inherent in our apparel supply chain is directly linked
- Monash University requests information from local suppliers to assess their compliance with legislation such as the Fair Work Act 2009. We encourage suppliers and/or their supply chain to comply with reputable industry codes such as Ethical Clothing Australia, Better Cotton Initiative, and Fairtrade.
- To further mitigate risks, foundational work has been undertaken to identify best practice in increasing transparency within our supply chain to provide a step-change improvement in Monash-branded apparel procurement, from raw materials through to manufacturing.
- Minimal apparel spend is attributed to our offshore entities. They will be considered when their onboarding is at the appropriate stage, including the potential to share suppliers used by Monash's Australian entities.

Retail leasing agreements

- Monash's Australian campus expenditure at Monash retail outlets is comparatively low, but the risks are material. Many of the retail outlets provide catering or food services, which are potentially high-risk. Engagements of this type are typically put in place through a leasing agreement with the University.
- Catering and food service providers have a similar labour force and risk profile to cleaning and security services. It is also an industry popular with domestic and international students seeking employment. The production of ingredients may also be a risk. Monash may contribute to risks at the service level due to student involvement (as discussed in the "Operational risks" section) and through our lease agreements with on-campus providers. However, Monash may be directly linked to the downstream risks due to our proximity to risks.

  The risks identified are:
  - tier one and two food services labour
  - ingredients at the farm level
  - rice, cocoa, and fish sourced from countries of particular concern (as addressed in our 2021 report).
- Monash is aware food services staff may also be engaged by retail partners for service within retail food outlets that operate on our campuses, and that this is a high-risk area
- We have completed an initial review of the various commercial engagement methods for retail partners and to understand the types of standard lease documents used. A wide variety of engagement types such as franchising are involved. Existing agreements are compliant with all legal obligations including labour obligations. Though still a potentially high-risk area, the detailed review has allowed this to be reduced to secondary priority for scheduling purposes after other higher priority risks have been addressed
- Offshore entities will be considered when they are risk-assessed.

Glove manufacturing – an update on a key issue from 2021

- In 2020, Monash University, in conjunction with the AUPN, identified an instance of modern slavery within its supply chain for latex gloves where it was likely that a third party providing labour supply services to an offshore subcontractor to a Monash supplier was engaging in:
  - deceptive recruiting practices
  - high recruitment fees
  - passport withholding
  - forced salary deductions
  - forced overtime
  - substandard living conditions.
- The outcome of this globally significant issue continues to be monitored as it progresses and has been the subject of global media coverage. Sources monitored include the supplier's published continuous improvement report
- The supplier's due diligence of recruiting agencies has been improved, including compliance with SEDEX Members Ethical Trade Audit (SMETA) or the Business Social Compliance Initiative (BSCI) Code of Conduct
- The glove manufacturer terminated the use of the labour supplier in question, and undertook remediation steps such as significant payments to impacted workers and ensuring the return of passports. This matter is now considered substantively remediated
- Although the University does not have a large spend in this area, we recognise the impact our spend has on creating demand in this supply chain
- This supplier and the entire glove manufacturing industry continues to be monitored as a high-risk supply chain
- In 2022, the supplier reported that they expected to spend over $75 million in improved accommodation for more than 10,000 employees (Note: this has not been independently verified by the University for completion or impact).

ADDITIONAL AREAS OF CONCERN IDENTIFIED IN 2022

Solar panels were prioritised more highly due to an identified potential business requirement which caused anticipated spend to become material.

ADDITIONAL ENTITY-SPECIFIC AREAS OF FOCUS

MONASH COLLEGE

In 2022, Monash College met with considerable operational headwinds that resulted in a deferral of some of Monash College's planned 2022 deliverables.

Monash College focused on:

- Ensuring all key staff were identified and received online training
- Supporting Freedom (FRDM) tool and Supplier Code of Conduct development.
- Supporting the cleaning and security high-risk services deep-dives.

Monash College offshore partnerships

The high-level risk assessment exercise conducted on Monash College offshore partners included a Modern slavery self-assessment questionnaire. The exercise concluded that all partners were assessed as low-average risk ratings. A key recommendation from the review was for partnership agreements to include a modern slavery compliance clause, which has been completed. The due diligence process for new partnerships was updated to request modern slavery compliance evidence. The agreement includes the modern slavery compliance clause which was signed by the new partnerships established in 2021. While progress is being made to embed this requirement in audit and due diligence processes, the evaluation of the effectiveness of these processes and steps to address policy gaps is yet to occur.

In 2022, a risk self-assessment of new partners Singapore Institute of Management (SIM) and Universal College Bangladesh (UCB) was conducted and covered a range of modern slavery questions covering general queries, employment conditions, and policies and procedures. SIM is considered a low-risk environment as its laws and regulations around minimum work standards and wages in particular are well-defined and implemented. Bangladesh is considered a higher-risk environment where the government has made significant efforts in improving its modern slavery response in recent years.

Whilst these initial assessments did not raise specific concerns, there is an opportunity to provide all offshore partners with tools to standardise the monitoring of modern slavery requirements. This includes an educative program of work around responsible sourcing audits and mechanisms to identify potential modern slavery risks. As part of Monash College's annual health check and auditing processes, modern slavery will be an area that is included as part of its program of work.

Carry-over actions from the 2021 action plan:

Embed supplier compliance and ethical due diligence questionnaires into procurement procedures and documents

- The vendor management onboarding process was updated to include modern slavery compliance and to align with the Monash University process for implementation in 2022
- This action is in the plan for 2023, which includes updating the contract clauses, reviewing the procurement policies and procedures, and rolling out the supplier code of conduct.

Ensure engagement of third-party service providers complies with relevant policies and procedures including modern slavery and procurement -

- The Office of the General Council (OGC) has updated the student placement agreement templates for Monash students undertaking placements with third parties (i.e. hosts) as part of their degrees to include modern slavery provisions clause. The Industry Placement team will implement the updated agreements in 2023.

MONASH UNIVERSITY INVESTMENTS, INCLUDING THE MONASH UNIVERSITY FOUNDATION PTY LTD

Monash University aims to be at the forefront of developing and leading the incorporation of environmental, social and governance (ESG) principles into its investment policy. Monash, via its investment advisor and investment managers, actively engages on ESG issues to influence corporate behaviour where possible.

The ESG investment process will:

- require the University and investment fund managers to be signatories to the United Nations Principles for Responsible Investment (PRI), which works to understand the investment implications of ESG factors, and to support its international network of investor signatories in integrating these factors into their investment and ownership decisions
- use a best-practice rating scheme or third-party review to select investment fund managers and/or investment funds
- invest in some tailored portfolios that exclude exposure to coal, tobacco, uranium, and cluster munitions
- incorporate the investment managers' approach to integrating ESG in the annual manager reviews and sector reviews
- review opportunities to invest in ESG-oriented investment strategies that meet the investment objectives of the long-term investment pool
- require fund managers to actively engage with investment companies on ESG issues –in the course of engagement with investment fund managers, if the University finds such managers to be unresponsive or unwilling to become responsive to our approach to ESG principles within a timeframe that the Monash University Council considers reasonable, Monash will divest from all investments with those managers
- seek annual updates from all investment managers on what they have done in relation to the Modern Slavery Act over the past 12 months.

Throughout 2022, all fund managers were signatories to the PRI and provided the University with all required reporting on their progress in relation to modern slavery.

MONASH UNIVERSITY MALAYSIA

Monash University Malaysia is part-way through onboarding to the modern slavery program.

Engagement with senior representation has been completed, and a representative is in the modern slavery steering committee and modern slavery working group. A total of 12 key staff involved in procurement of high-risk areas completed the online modern slavery training in 2022. The online training will be extended to senior staff (heads) and key staff involved in procurement tender committees in 2023.

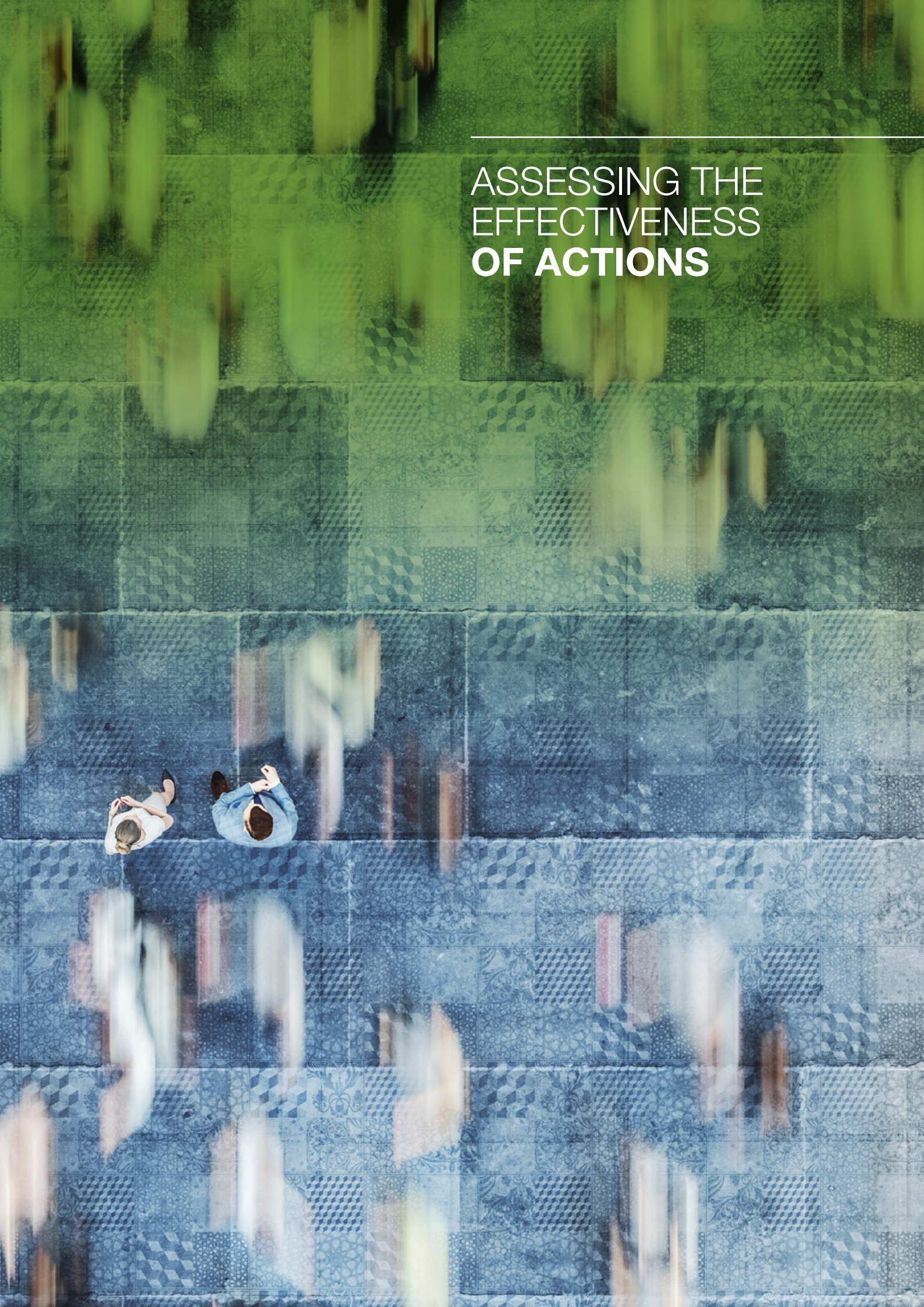
Spend analysis is underway to allow a clearer understanding of the supply base and prepare data for uploading to the FRDM supplier risk assessment tool.

An initial risk assessment for Monash University Malaysia has been undertaken, primarily using the Global Slavery Index report of high risks for Malaysia.

High-risk areas relevant to Monash University Malaysia are:

- Malaysia is characterised by a large, vulnerable local population and the use of low-skilled migrant labour. There may be risk even when using tier one suppliers, especially if there are additional layers of labour subcontracting where supply chain opacity becomes an even larger issue
- Garments and apparel are high-risk. Although spend in this area is low, we will address this by utilising the solution deemed suitable for Monash in Australia if possible. This solution is still being assessed
- Construction services in Malaysia, even when tier one suppliers are used. Large construction projects that are likely to involve one or more levels of subcontracting are of particular concern
- Many construction materials are high-risk
- The electronics purchased by Monash University Malaysia are from tier one OEMs and are captured by the whole-of-Monash electronics risk reduction program we have in place. Malaysia also has factories producing electronics that are considered high-risk.

ASSESSING THE EFFECTIVENESS **OF ACTIONS**



GENERAL APPROACH

Monash recognises the complexity of modern slavery, and has established the Monash University Modern Slavery Governance Structure to guide and assess its modern slavery program and the evolving framework, specifically for review and remediation of any concerns or instances identified.

In addition to an existing control framework to ensure compliance in the following areas, the University's modern slavery program has established an advisory committee with decades of global expertise and experience in the areas of:

- human trafficking and slavery
- criminology
- operations and supply chain management
- employment law and regulation
- temporary migration
- business law
- human rights
- global business
- migration and inclusion
- violence against women.

When instances of modern slavery are identified, initial data is sought, and the working group and steering committee are consulted to identify the best way forward, with a focus on helping the victims and implementing realistic actions in response to the issue through to its identified reasonable resolution and follow-up plans. If at any stage it is identified that there may be an imminent threat to a victim's safety or wellbeing, the Australian Federal Police will be contacted as a matter of urgency.

As further high-risk areas are identified, and as our program continues to mature, a framework is being developed based on the lessons we've learned. This framework will form the basis for a policy once proven to be efficient, effective and meaningful.

Effectiveness of actions can be assessed at various levels. Monash will undertake a robust assessment of the effectiveness of its actions in subsequent years of its five-year modern slavery program, with these reviews reflecting the progressing program of work:

1. Internal compliance checks with checklists designed in conjunction with our academic experts. Examples already identified include:
    a. confirming the use of the correct contract and RFT templates containing the latest modern slavery terms
    b. the supplier onboarding gate being effectively in place
    c. training completion rate by key staff
    d. supplier questionnaires
    e. documentation of all high-risk areas and their status through to completion.
2. External sector engagement (such as via the AUPN) to assess cross-university effectiveness, combined supplier influence, and compare sector performance with Monash
3. External stakeholder engagement to continue the dialogue with third parties in relation to risk identification and strategising in relation to identified risk
4. Affected labourers identified as being subject to modern slavery practices and how they are progressing after remediation steps have been taken. This is a longer-term goal
5. Where appropriate, the use of third-party partners or auditors to check on suppliers and factories – including offshore – to check that real and meaningful progress has been made and remains in effect.

KEY PERFORMANCE INDICATORS

KPIs will be utilised where possible to measure progress and set targets. These may be adjusted over subsequent reporting periods in line with ensuring relevance and continuous improvement.

Supplier onboarding

KPI: Percentage of supplier compliance (excluding one-time suppliers)

Target:	100%
Achieved:	100%

The new Monash University Australia modern slavery supplier onboarding gate has been in place for 2400 new suppliers over 2022.

There has been 100 per cent compliance from new suppliers and no manual exceptions processed. This meets our KPI of 100 per cent compliance for normal supplier onboarding. Exceptions to this rule are low-value, low-risk one-time suppliers and credit card transactions, or manual supplier onboarding exception approval should it be justified. One-time suppliers and credit card transactions are deemed suitable for an alternate procurement approach at this time. This is by design as part of a prioritised approach, and they will be considered at a later time in addition to other entities.

Modern slavery reporting by fund managers

KPI: Percentage of fund managers providing annual update on their modern slavery report

Target:	100%
Achieved:	100%

Monash University investment fund managers must provide an annual report to the University. This includes a mandatory report on modern slavery-related actions undertaken over the previous 12 months.

All reports were reviewed and included an acceptable level of detail, listing meaningful and reasonable actions such as supplier risk assessments, investment risk assessments, and staff training. Reporting on meaningful modern slavery progress by fund managers has a 100 per cent KPI which has been satisfied.

Staff training

KPI: Percentage of key procurement and legal staff completing the training

Target:	100%
Achieved	100%

A total of 4797 staff completed the online modern slavery training module in 2022. Of that number, approximately 105 staff were considered as key staff, and all of those key staff have completed online training.

New KPIs identified for 2023:

Two new online training completion KPIs have been identified for reporting against in the 2023 reporting period to improve the effectiveness of training by establishing the following two new KPIs, each of which has a target of 100 per cent.

- members of the Modern Slavery Steering Committee and Working Group
- the most senior University staff.

Update offshore partners review process (Monash College only)

KPI: Percentage of offshore partners completed the updated desktop review process

Target:	100%
Achieved:	NA

The offshore partner annual desktop review process builds on the self assessment questionnaire. After assessing all partners as low-risk, the intent in 2022 was to review all partners. However, this was deferred for operational reasons. Two new partners undertook self-assessment, one of which was considered low-risk, the other operates in a higher risk environment. Further work is required on audits, training and standardised tools for our offshore partners. Review of modern slavery compliance is scheduled to be incorporated into the partner auditing process.

A REVIEW OF OUR 2022 COMMITMENTS/HIGHLIGHTS

2021 Commitment	What we did in 2022
ONSHORE AND OFFSHORE TRAINING	
Extend the modern slavery training module to relevant staff at Monash University Australia, Monash College, Monash University Malaysia and other newly-onboarded entities as deemed appropriate by the senior leadership group in each entity.	Online training rollout has progressed well across Monash University, Monash College, and offshore to Monash Malaysia. More than 200 staff received additional face-to-face training.
ADVANCED TRACKING SYSTEM	
Operationalise FRDM across Monash University Australia and Monash College.	FRDM is operational however wider use is pending enhancements to supplier questionnaires.
Collate and analyse procurement data from Monash University Malaysia and other newly-onboarded entities.	Internal spend data continues to be analysed for insights that help direct our work. However, material insights from FRDM are delayed whilst the AUPN determines the best data gathering method, which may impact up to 100,000 suppliers.
INDUSTRY DEEP-DIVE	
Commence deep-dive with Electronics Watch for Monash University's ICT hardware procurements.	Electronics was analysed, and a solution was put in place with an updated process to implement change. This includes in-country proactive monitoring and alerts.
Assess feasibility of participating in the higher education sector pilot managed by the Cleaning Accountability Framework, and explore alternative deep-dive mechanisms for cleaning and security services.	Assessed – participation in CAF/AUPN. The pilot is not possible as the University's business requirements are more time-sensitive. The University may engage CAF in specific areas for support.
Map out existing supply chains for our main apparel suppliers.	All apparel requirements, suppliers, and buyers have been mapped out. Suppliers have been assessed.
AGREEMENT AND SOURCING TEMPLATES UPDATE	
Commence update of agreement and sourcing document templates across Monash University Australia and Monash College.	Agreement and sourcing templates have been updated. Training has been completed by more than 200 staff. New templates have been rolled out.
ASSESSMENT OF NEW RISKS	
Solar panels assessment.	Solar panel assessment has been completed back to raw materials. Additional assessment to be undertaken once final specifications are known.
Catering pre-assessment undertaken and moved to a secondary priority.	Initial leasing assessment undertaken. Leases comply with labour laws. Further work to be considered. Complex lease arrangements identified including third party franchise agreements.
Lab coats moved to a secondary priority after completion of apparel RFT.	Temporarily on hold to allow prioritisation of higher risks.
Security Services tender planning and analytics support underway.	Security services work commences in 2023 in line with business requirements.
OPERATIONAL FRAMEWORK	
Develop an operational framework to coordinate and guide implementation of modern slavery actions across entities.	Operational framework has been drafted and is awaiting approval and implementation in 2023.
COMPLIANCE MONITORING	
Continue monitoring of supplier onboarding and completion of modern slavery training.	2022: KPIs in place and reported on. Three additional KPIs identified for 2023.
COMMENCE ONBOARDING OF WHOLLY-CONTROLLED OFFSHORE ENTITIES	
Continue onboarding of Monash University Malaysia.	2022: Monash Malaysia is fully onboarded.
Commence onboarding of World Mosquito Program Ltd and Monash University Indonesia.	2022: World Mosquito Program and Monash University Indonesia have commenced and are progressing through onboarding.
MONASH COLLEGE SPECIFIC COMMITMENTS:	
Supplier management and tendering process. Internal audit of staff selection process. Offshore partnership review. Embed compliance and ethical questionnaires into procurement procedures and documents. Bulk update of student placement agreements.	These were deferred for operational reasons and are currently planned for 2023.

REMEDIATION

Monash identified no incident requiring remediation in 2022.

However, we acknowledge we may not have visibility of all areas where remediation may be required.

We also acknowledge that ensuring the effectiveness of any remediation may be very difficult. When the opportunity to remediate arises, it will be discussed with the Working Group and academic experts, and then reported to the Steering Committee. Solutions for impacted parties may include:

- direct monitoring
- indirect monitoring via a qualified third party
- termination of the engagement.

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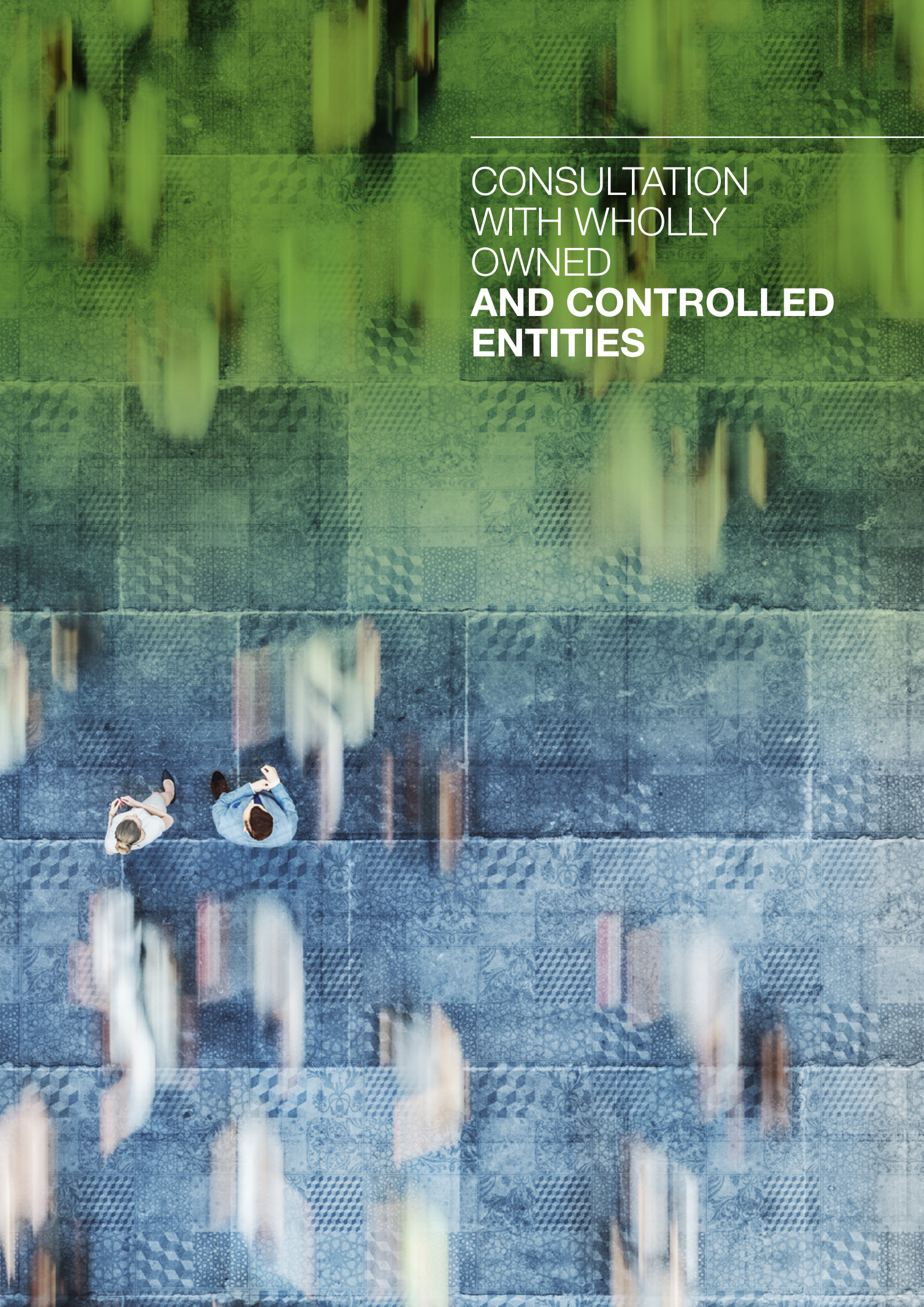
CONSULTATION WITH WHOLLY OWNED **AND CONTROLLED ENTITIES**



PROCUREMENT

Monash University has a distributed procurement model embedded in most of the entities within scope of this report. Primary University-wide procurement policies and procedures are managed by Strategic Procurement, which provides support, as required, across any procurement projects, typically high-value/risk and/or University-wide contracts.

The Strategic Procurement team annually completes the Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply eLearning program and test. Strategic Procurement is leading the modern slavery program for all in-scope entities and the preparation of the joint Modern Slavery Report for Monash University. Direct engagement with relevant entity staff has occurred to understand their situation and procurement, and to assist with their compliance.

Strategic Procurement is responsible for coordinating all procurement activity across the University, implementing procurement policy and procedures, and providing category management for strategic categories across the University. Strategic Procurement also provides strategic sourcing support across the University, and expert support, advice and tools to all procurement specialists. Procurement specialists are located in business portfolios for specialist procurement categories (for example, Buildings and Property Division and eSolutions), and are responsible for the procurement and contract management of specified categories.

Monash College and Monash University Malaysia have their own procurement functions. They work closely with Monash University to drive alignment and the application of suitable policies and procedures where necessary. Monash College and Monash University Malaysia representatives are part of the modern slavery working group.

Monash University Foundation is managed within the portfolio of the Chief Financial Officer and Senior Vice- President. The foundation operates within Monash University Australia's purchasing process and has representation on the Modern Slavery Steering Committee.

OPERATIONS

Reporting structures are structured so that Monash University, the parent entity, is aware in all situations of operational concern and key decisions for all controlled entities.

An operations representative is present on both the Modern Slavery Steering Committee and the Modern Slavery Working Group.

CONSULTATION AND ONBOARDING OF ENTITIES

The onboarding process has now been refined and we have a proven, structured approach that includes both ongoing engagement and consultation. It is expected that additional entities outside of those that currently exist will be created over time, therefore an efficient, standardised approach was warranted.

The following key steps are undertaken for onboarding new entities. The first entity to commence onboarding was Monash College, followed by Monash Malaysia, Monash University Indonesia and the World Mosquito Program. A phased approach is used for thorough onboarding.

- **Engagement:**
  Raising the topic of modern slavery and the program of work with a suitable member of the senior executive group of the entity. Due to a clear reporting line of the CEOs of wholly-owned entities through to the Vice-Chancellor, initial engagement is efficient and simple
- **Entity representation:**
  A request is made for the nomination of appropriate staff to represent the entity on the working group and steering committee
- **Knowledge transfer:**
  Background briefings are provided to relevant staff from the entity to increase awareness and the level of modern slavery knowledge within the entity
- **Supply chain risk assessment:**
  The cleansing and inclusion of the entity's procurement data into our database, including uploading into the FRDM tool for risk assessment. An assessment of the entity's specific risks within their home country as identified by the latest Global Slavery Index report
- **Additional consultation specific to the entity, including:**
  - the identification of the unique risks and concerns the entity may have
  - understanding the operations and supply chains the entity has in place
  - the identification of template agreements, processes, procedures, and any sourcing documents that may need to be reviewed, including any that may be in foreign languages
  - relevant legal nuances (for an offshore entity), including any existing modern slavery-related legal obligations that apply in their country, and staff employment instruments in place
  - planning and socialisation of timing, expectations, and outcomes – these are updated in conjunction with the entity representatives

  - subsequent phased introduction of the modern slavery program of work for that entity, followed by the commencement of a more detailed inclusion in the next annual Modern Slavery Report.

- **Training:**
  The identification of key staff in the entity to undertake modern slavery training, the rollout of the multimedia training module to those staff, and the tracking of its completion.

The work required to onboard an entity, including any risks identified and the plans to address them, are discussed in the working group and steering committee meetings before being factored into the work program. The entity's representative in the working group and/or the steering committee creates a central, knowledgeable, conduit back into the entity for all aspects of the program.

The degree to which these steps apply may vary. Reasons for this may include the provision of certain services by Monash University (the parent entity) to some related entities. This may vary from entity to entity.

In this way, the process was continually refined. During 2022, we determined that we had a well-defined, common, proven onboarding methodology that we have now formalised into our Modern Slavery Operational Framework, scheduled for approval and introduction in 2023.

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OTHER **RELEVANT INFORMATION**

BUILDING A STRONGER HIGHER EDUCATION SECTOR

As a leading education and research institute, Monash University recognises the importance of supporting the wider Australian higher education sector. Monash has made considerable contributions to the AUPN Modern Slavery Program through active participation in various working groups and having significant representation on the AUPN Modern Slavery Academic Advisory Board. This sector-level contribution by Monash is in addition to the University's own modern slavery program of work.

The AUPN has assembled a Modern Slavery Working Group, aimed at building a sector-based approach to reduce modern slavery risk by producing supporting solutions and materials to enable member universities to drive efficiencies and create opportunities to identify issues across the sector. This includes standardised contract clauses, key supplier engagement forums, and a cross-university Modern Slavery Academic Advisory Board.

Three of the nine board members are Monash academic staff members who are leading experts in employment law, criminology and international human rights matters.

The benefits of the coordinated higher education sector approach that the AUPN facilitates includes efficiencies in assessing, identifying and remediating risks across supply chains. This coordinated approach also supports bespoke reporting by individual universities, depending on their situation.

For those universities utilising the FRDM supplier risk assessment tool, the efficiencies also flow on to suppliers who may benefit from responding to modern slavery-related requirements from more than 30 universities through a single portal.

Apart from AUPN, Monash is also an active participant in a number of higher education sector initiatives. Examples include:

- Council of Australasian University Directors of Information Technology (CAUDIT) – 63 members uniting to transform how research and education leverages the latest digital technologies
- Council of Australian University Librarians (CAUL)
- Tertiary Education Facilities Management Association (TEFMA)
- Australian University Senior Finance Officer Group (AUSFOG)
- Group of Eight Universities
- Universities Australia.

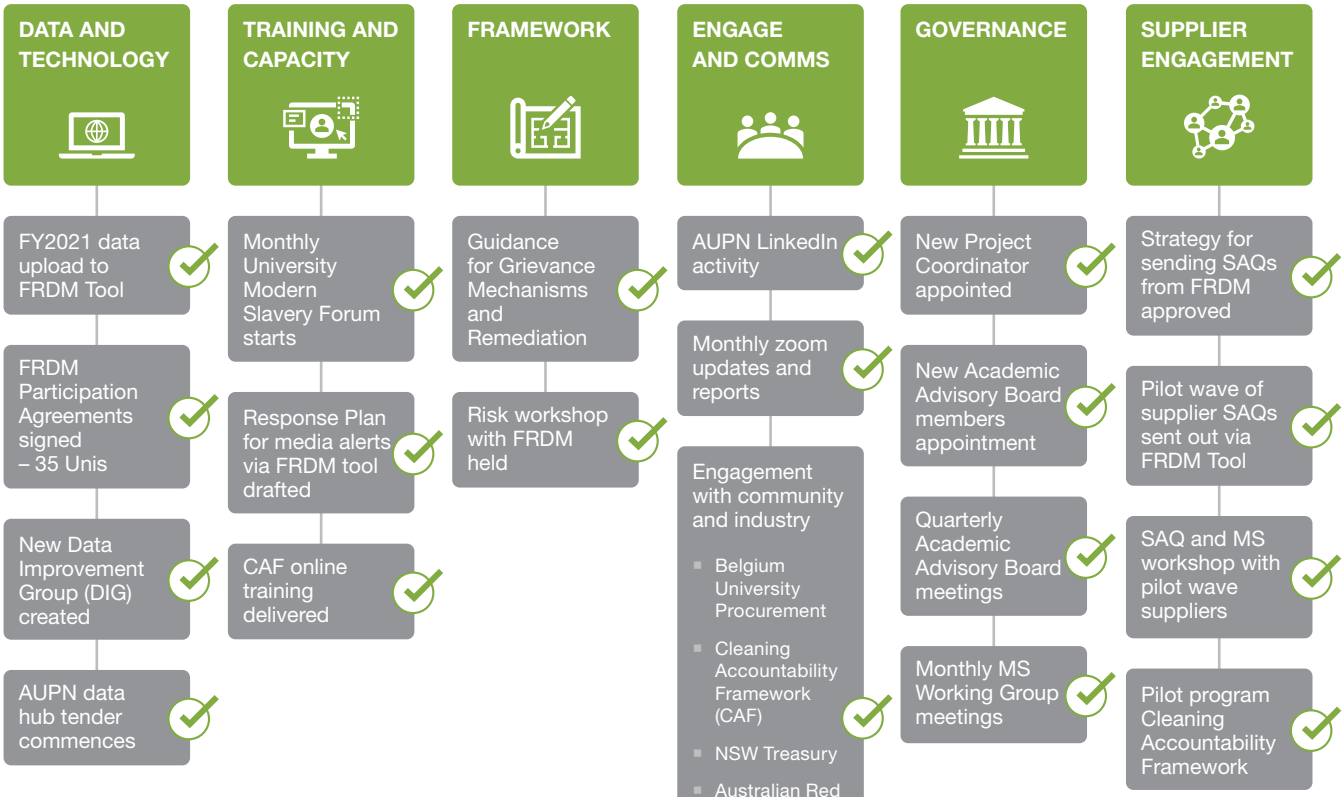
ACKNOWLEDGEMENTS

Monash University academics contributed to the Modern Slavery program of work, including this report:

- Monash Business School
  - Dr Ingrid Landau, Business Law and Taxation
  - Professor Dayna Simpson, Operation and Supply Chain Management
  - Dr Nga Pham, Monash Centre for Financial Studies.
- Faculty of Arts
  - Professor Marie Segrave, Criminology.

2022 AUPN MODERN SLAVERY WORKING GROUP KEY ACHIEVEMENTS

PROGRAM KEY ACHIEVEMENTS IN 2022



EVENTS AND KEY DELIVERABLES IN 2022

ONGOING: Weekly FRDM project meetings, change management meetings and monthly status updates; monthly Modern Slavery Working Group meetings and monthly University Forum meetings; quarterly Academic Advisory Board meetings and presentations to the AUPN community

2022

Q1

- FRDM testing January
- Soft-Launch January
- GO-LIVE February
- Train-the trainer sessions March
- 2nd data upload
- Nominations for 2022 Academic Advisory Board (AAB)
- Formation of University Modern Slavery Forum and Data Improvement Group
- 1st University Modern Slavery Forum meeting.

Q2

- 2022 Academic Advisory Board members appointed
- New Program Project Coordinator appointed
- Data improvement workshop with uni's, FRDM and Arc Blue
- Presentation to Belgium Universities on Ethical Procurement
- 1st Data Improvement Group meeting held
- Strategy for a pilot of FRDM supplier SAQs
- Sustainability project of the Year Award.

Q3

- Pilot of supplier SAQs from FRDM Tool commences
- Universities complete a self assessment via FRDM Tool
- Risk workshop with FRDM held
- Academic Advisory Board meeting – University Modern Slavery statement review
- AUPN spend data hub tender commences
- Weekly meetings with FRDM to resolve issues commence
- Supplier feedback session on the FRDM SAQ process undertaken.

Q4

- Individual meetings with suppliers to discuss FRDM SAQ results
- Recruitment of new AUPN Modern Slavery Program Manager
- AUPN Australian Modern Slavery Act review feedback session with Professor John McMillan AO
- University CAF program pilot commences.

2023

2023 PLANNED[1]

- Commencement of AUPN Modern Slavery Program Manager
- Operationalisation of FRDM, including more training and processes defined
- Integration with new AUPN spend data hub service provider
- Supplier engagement
- 2023 priorities survey.

CONTINUOUS IMPROVEMENT

1. Third Statement due 30 June 2023.

2023 ACTION **PLAN**

Monash University has a five-year plan in place to increase the scope of entities covered by each subsequent annual Modern Slavery Act Report until all relevant Monash entities and operations are within scope of the report.

The five-year plan is a dynamic initiative which is expected to change and evolve as we learn and mature our approaches along with the actors in our supply chains.

Lessons from the past year that have informed the remainder of our program include:

- There may be scenarios where it is not possible to safely buy with certainty. If these are identified, guidance will be sought from international standards and guidelines with the goal of dealing directly with these complexities in detail.

2023 ACTIONS

Training program review

- Survey training effectiveness.

Expanded compliance monitoring

- Implement and track three new KPIs for training.

Offshore agreement and sourcing templates update

- Assessment of WMP and Indonesia local agreement and sourcing templates against modern slavery requirements.

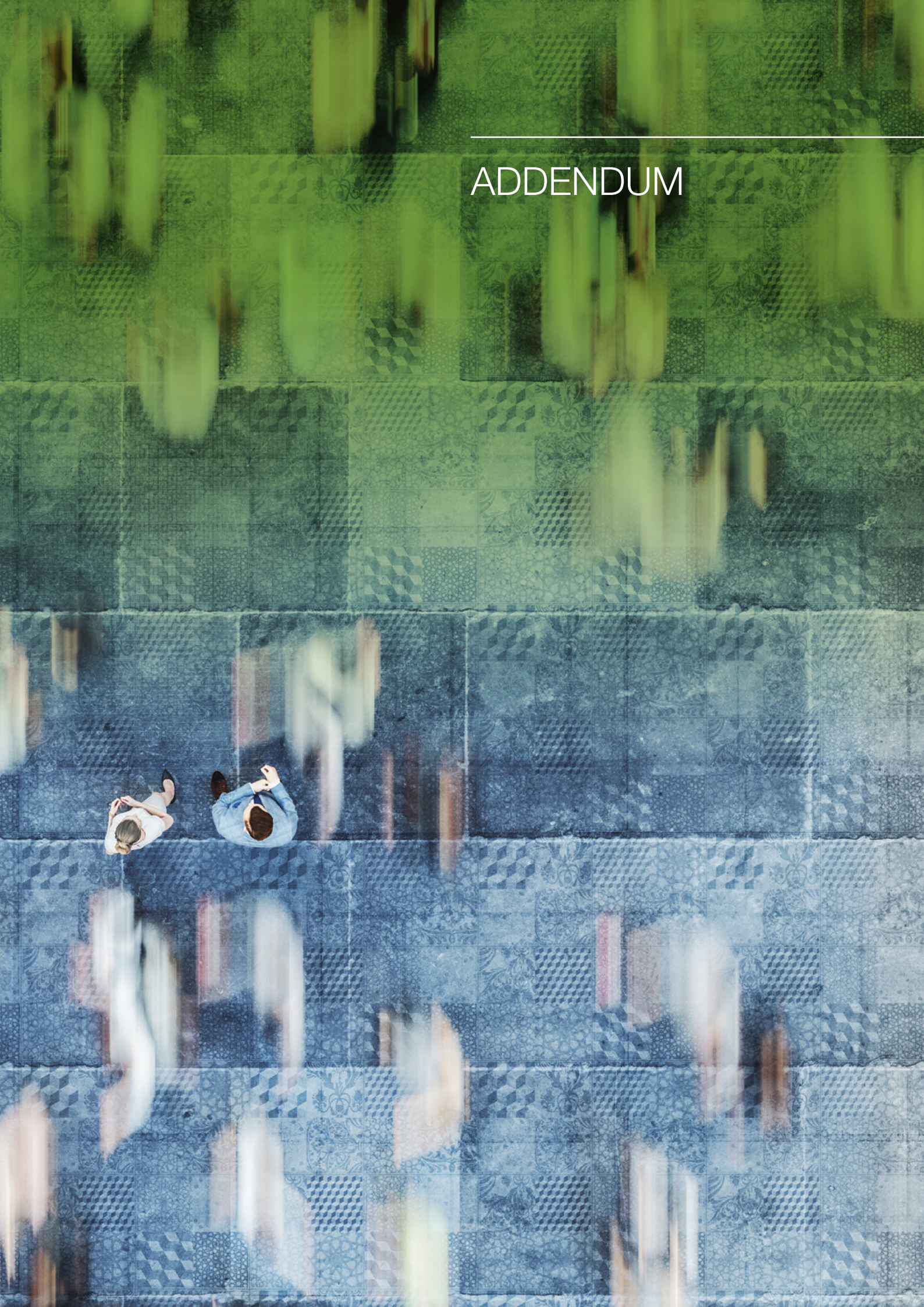
Implementation of operational framework

- Operational framework approval and commencement.

Expand offshore training rollout

- Expand training to WMP and Monash Indonesia.

ADDENDUM



MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of

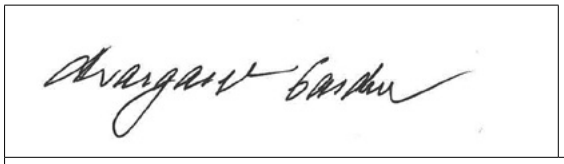
Monash University (ABN 12 377 614 012)	
as defined by the *Modern Slavery Act 2018* (Cth)[1] ("the Act") on	14 June 2023

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of

Monash University Council

as defined by the Act[2]:



President and Vice-Chancellor Margaret Gardner AC is the responsible member.

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

MANDATORY CRITERIA	PAGE NUMBER/S
a) Identify the reporting entity.	20
b) Describe the reporting entity's structure, operations and supply chains.	17–23
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	8–10, 22–23, 28–33, 35–43
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	9–10, 34–43
e) Describe how the reporting entity assesses the effectiveness of these actions.	8, 41, 44–48
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	27, 51–52
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	25, 55–59

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

MONASH University

CONTACT DETAILS

Manager Procurement Strategy & Governance
211 Wellington Rd, Mulgrave 3170, Australia

E: sustainable.procurement@monash.edu
monash.edu

facebook.com/Monash.University

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