

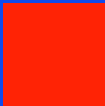


UTS
College

UNIVERSITY
OF TECHNOLOGY
SYDNEY

FY2025

**Modern Slavery
Statement**



Contents

Message from the CEO	3
About UTS College	4
Our structure, operations and supply chain	5
Modern slavery risks in our operations and supply chain	9
Our response to modern slavery risks	10
Education agents	16
Students	17
IT vendors	18
Further steps	19



UTS College Limited ACN 001 425 065

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) and is made for the financial year ending December 2025.

UTS College Limited (formally Insearch Limited trading as UTS College) (we, our, UTS College) is the reporting entity of this Modern Slavery Statement. As a controlled entity of a New South Wales state-owned corporation, UTS College is bound by the NSW Modern Slavery Act 2018 and is required to voluntarily submit a Modern Slavery Statement in accordance with section 6 of the Modern Slavery Act 2018 (Cth).

Message from the CEO

As a global enterprise, we are committed to ethical business practices that help to maintain the highest levels of health, safety, and human dignity globally. We condemn all forms of human rights abuses and the exploitation of children, and we are proud of the steps we have taken to combat modern slavery.

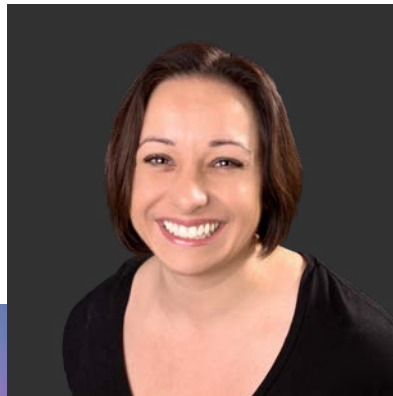
We recognise our responsibility to contribute to a world where every person is treated with dignity and afforded their fundamental rights. Accordingly, we take a proactive and risk-based approach to identify and address modern slavery. We assess and mitigate potential risks of modern slavery throughout all areas we operate in - whether within our supply chain, employee base, agent relationships, or educational partnerships.

Our approach extends beyond legal compliance, reflecting our intention to lead with integrity and embed ethical conduct in all aspects of our activities.

As an education provider, we recognise our unique ability to influence awareness, capability, understanding and behaviour among our staff and students. We are embedding modern slavery awareness not only through internal training, staff onboarding and professional development, but also in the design and delivery of our programs, through targeted student engagement, curriculum integration, and collaboration with expert organisations.

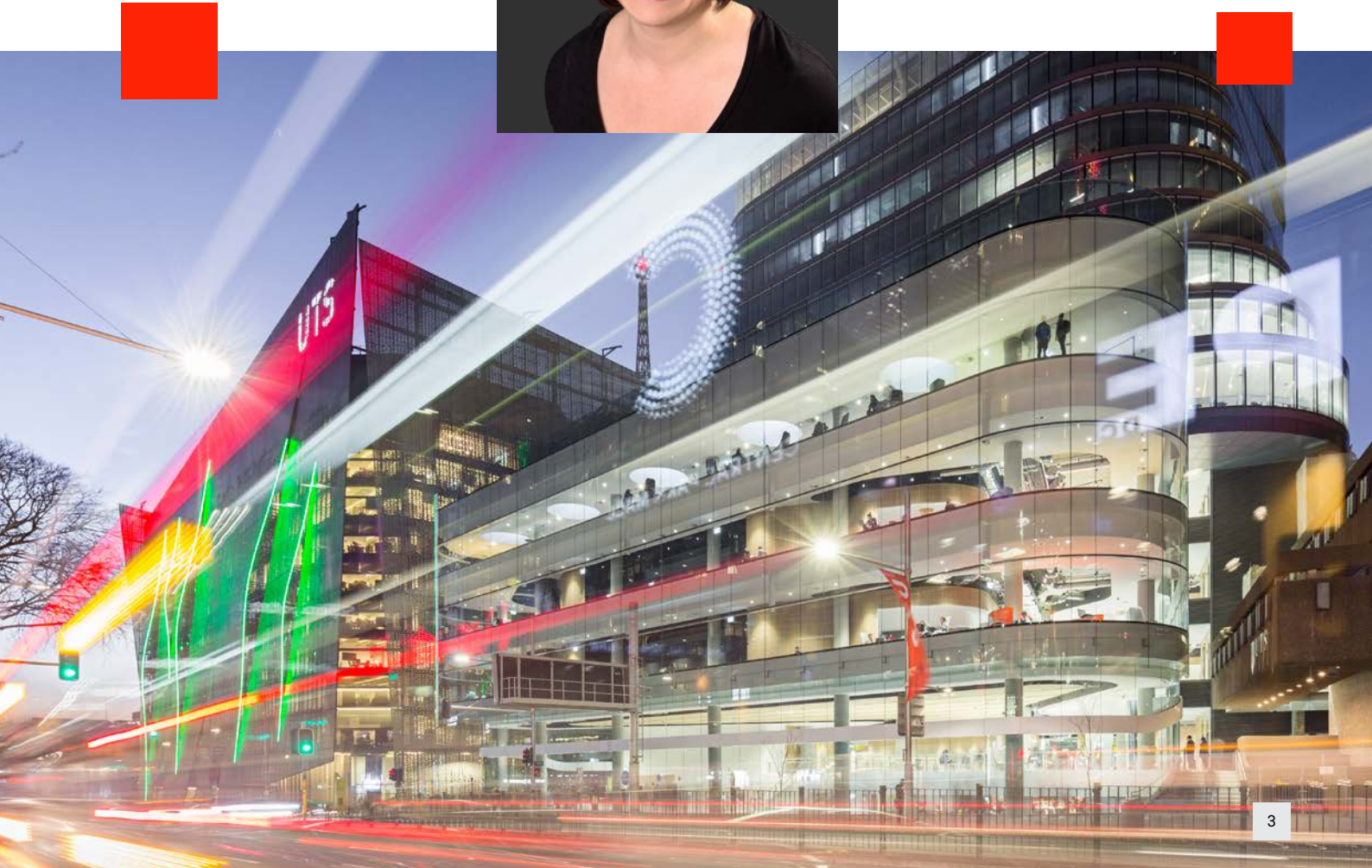
In parallel, we are strengthening our external relationships with education agents and suppliers, to ensure that human rights considerations are systematically embedded in how we select, engage and monitor our partners.

We believe this contributes to a learning environment that not only informs, but empowers, our community to uphold and advocate for human dignity.



Morwenna Shahani

Chief Executive Officer
UTS College



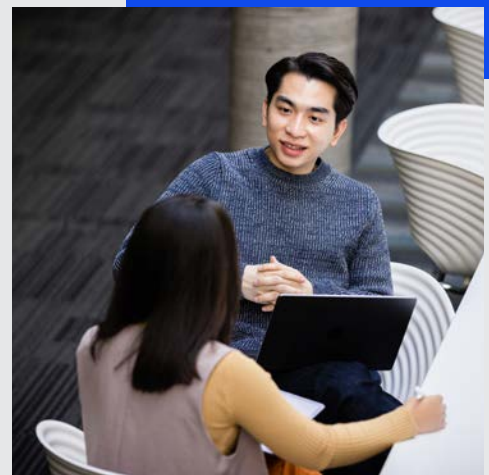
About UTS College

UTS College is a leader in pathway education. We were one of the first pathway colleges in Australia and have supported thousands of students – both Australian and international – to achieve their dreams and aspirations. This spirit of innovation has continued throughout our 35-year history and remains a feature of how we work today. We have consistently focused on the quality and originality of our educational delivery and have highly qualified and experienced academic teams. We have a very strong focus on the diversity of our student community to ensure richness in our student experience and an environment in which their perspectives, friendships and global networks can radically expand. This is more important now than ever.

Our focus on diversification has extended to transnational education (TNE), firstly through our long-standing SILC partnership with Shanghai University (one of the oldest collaborations for an Australian institution with a Chinese university), through our flagship campus in Sri Lanka and through our pathways operated with institutional partners in India, Bangladesh, Indonesia, South Korea and China. We understand the global nature of pathway education and its continually shifting policy and competitive landscape and seek to foster a culture that can adapt to ongoing change and see the opportunities within that environment.

Our culture is purpose-driven and collaborative, and we are dedicated to our students and proud of their achievements. We are committed to continuous improvement and to always seeking ways to do things differently and better. We aspire to be a place where our values of integrity, honesty, courage, compassion, respect and imagination are alive and tangible in our everyday interactions, in our planning and execution and in the way others see us.

The College is a wholly owned entity of the University of Technology Sydney (UTS) and our Sydney campus is based at UTS in the heart of the city. We enjoy and value our close strategic and operational relationships with the University across all areas of our work.



Our structure, operations and supply chain

Our structure

UTS College (ACN 001 425 065), formally Insearch Limited, is a company limited by guarantee and a controlled entity of the University of Technology Sydney (UTS). UTS was established under the University of Technology Sydney Act 1989 (NSW) and offers undergraduate and postgraduate degree programs and related educational operations. UTS College operates as a pathway provider to UTS.

Our head office is located at Level 13, UTS Building 10 (CB10), 235 Jones Street, Broadway, NSW 2007, Australia. UTS College leases its Sydney teaching campus, located in UTS Building 5 (CB05), 1-59 Quay Street, Haymarket NSW 2000, Australia, from UTS.

UTS College also has premises, offices and staff in the following locations:

Name	Country	Structure	Functions
Insearch Education International Pty Ltd, 1995	Australia	Fully owned subsidiary and controlled entity	Holding company
Insearch Global Pty Ltd, 2018	Australia	Fully owned subsidiary and controlled entity	Holding company
Insearch (Shanghai) Limited, 2001	China	Fully owned subsidiary and controlled entity	Student recruitment services
Insearch Lanka (Pvt) Limited, 2018	Sri Lanka	Fully owned subsidiary and controlled entity	Sri Lankan campus
UTS College Limited Representative Office, 2015	Vietnam	Representative Office	Student recruitment services

Our operations

We are an Institute of Higher Education, registered through the Tertiary Education Quality and Standards Agency (TEQSA). Since late 2020, we have been using the business name UTS College. We provide pathway programs for domestic and international students to enter degree programs at UTS.

Our workforce comprises 215.17 full-time equivalent (FTE) employees, with some team members operating from overseas locations. All policies and procedures established by UTS College apply to all entities it owns and controls, including subsidiaries and overseas operations.

We operate two campuses: one in Sydney and the other in Colombo.

UTS College Sydney campus programs

At our campus in Sydney, we offer four levels of Academic English (AE2 to AE5), Cambridge International AS and A Levels, UTS Foundation Studies, seven diplomas: Diploma of Animation Production, Diploma of Business, Diploma of Communication, Diploma of Design & Architecture, Diploma of Engineering, Diploma of Information Technology, and Diploma of Science, and two graduate certificates: Graduate Certificate in Accounting and Finance, and Graduate Certificate in Technology Practice.



UTS College and TNE partner locations

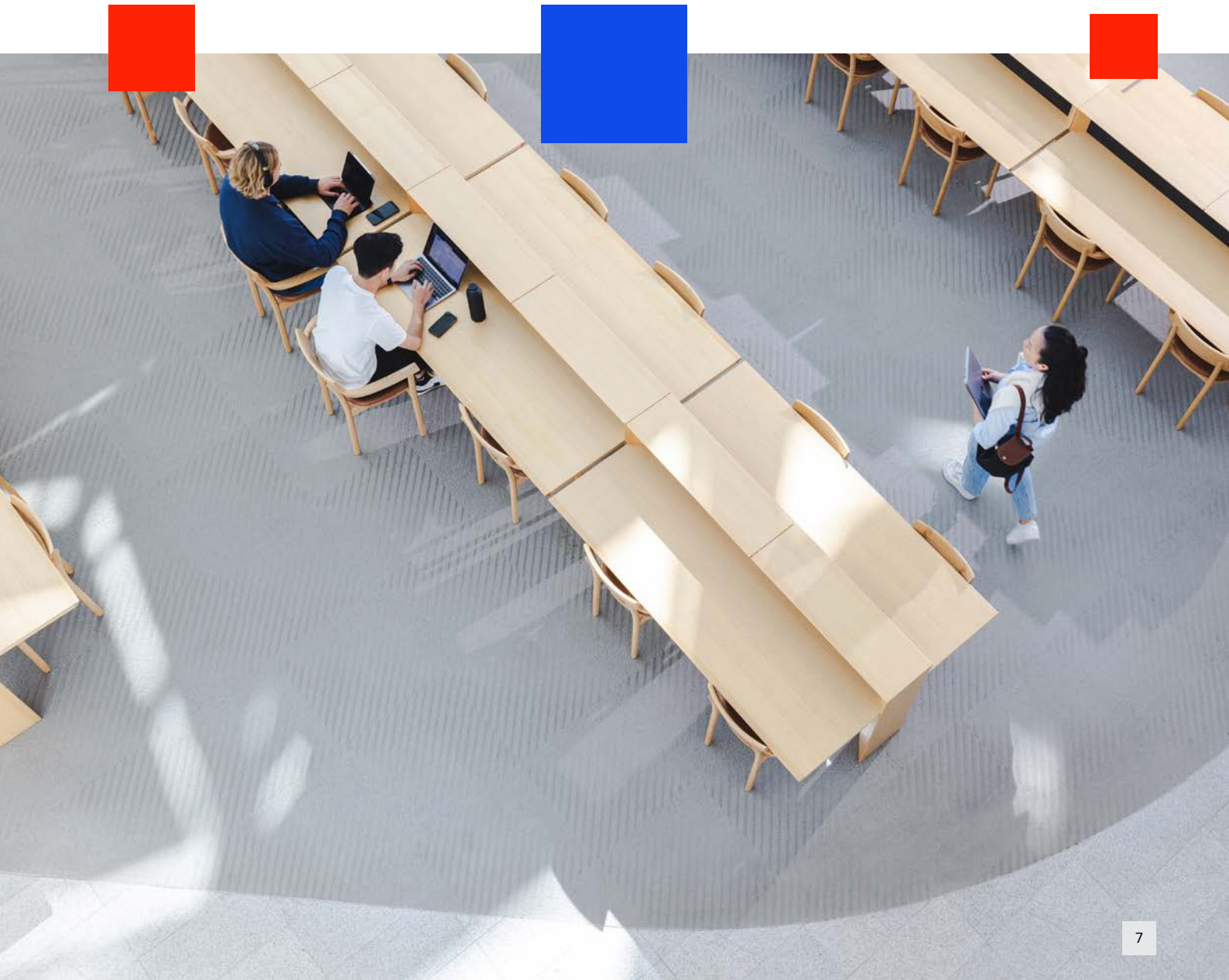


Our supply chain

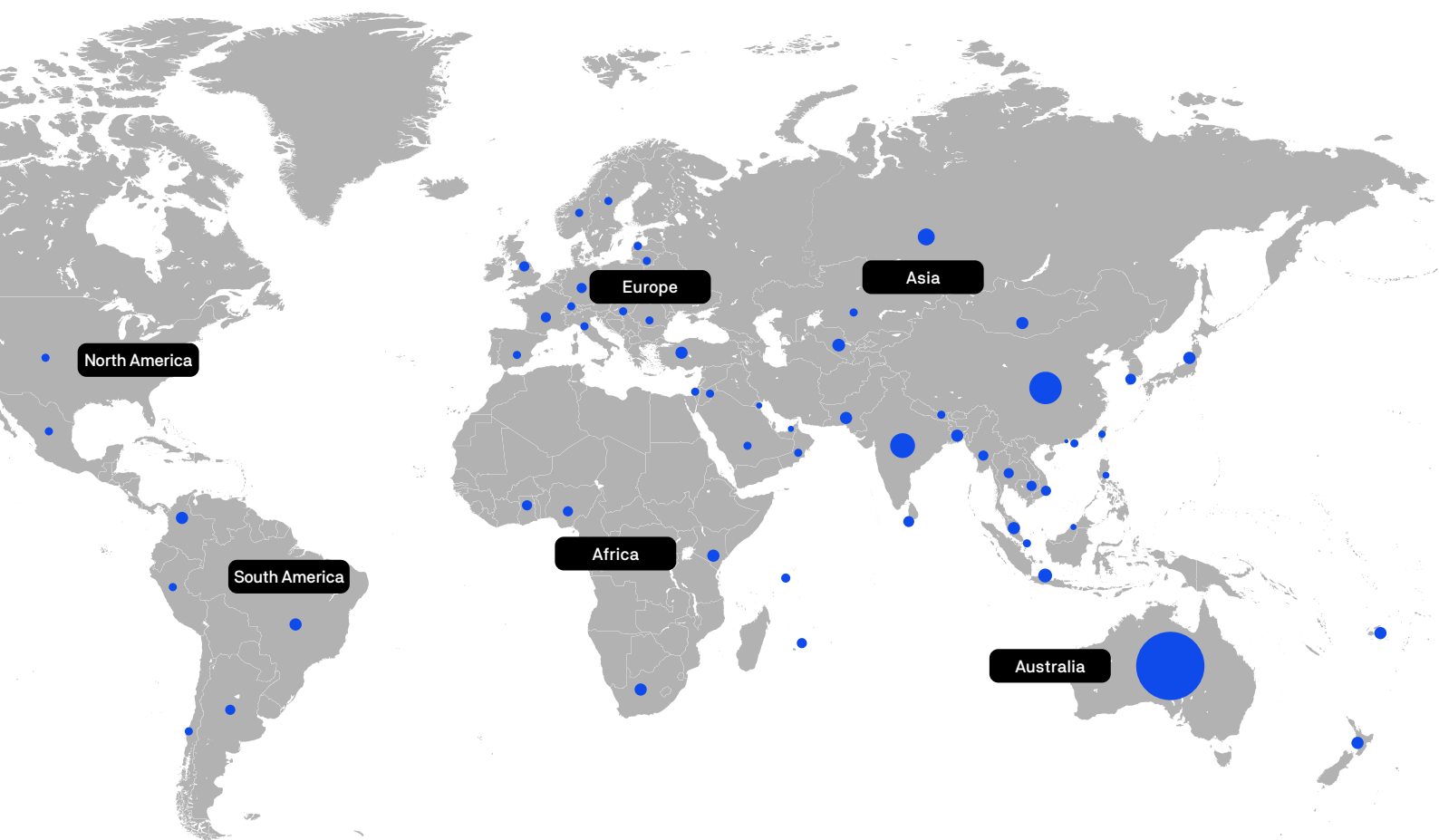
Our supply chain is extensive and global, and incorporates a wide range of products and services spanning a variety of industry sectors, broadly grouped as follows:

- contracted education agents who operate as our direct agents to recruit international students for UTS College. Education agents provide international students with information about options for studying and living overseas and support them with their course and student visa applications. We have 235 contracted education agents across 1896 branches in 90 countries around the world, as outlined on the map on page 8.
- property, including rent of buildings, and property services, including cleaning, engineering and maintenance services, security, and waste disposal
- information technology and telecommunications, including hardware, software, and consulting services
- human resources
- financial services; and
- marketing and promotional services.

We work with more than 561 first-tier suppliers located in more than 35 countries. While we recognise that risks of modern slavery can exist deeper in supply chains, this statement focuses on our first-tier suppliers, as we have not yet extended formal due diligence or risk assessment processes to our second-tier suppliers. We acknowledge the importance of addressing modern slavery risks at all levels of the supply chain and are committed to progressively expanding the scope of our assessments over time.



UTS College education agents by country



Our **235** contracted education agents are located in 1896 branches across 90 countries around the world.

Consultation

In preparing this statement, we engaged each of the reporting entities covered by this statement and consulted the entities we own or control. We engaged with our primary supplier, our major IT vendor, through targeted questionnaires and follow up analysis. For education agents, we did not issue questionnaires during this reporting period and instead prioritised strengthening onboarding, contractual and monitoring processes.



Modern slavery risks in our operations and supply chain

Operations risk assessment

The risk of modern slavery within our direct operations has been assessed as low, given the nature of our workforce and operational structure. However, this risk will continue to be monitored regularly to ensure responsiveness to any changes in the operational landscape or external risk factors.

Supply chain risk assessment

In previous statements, we have assessed the risk of modern slavery by assigning all suppliers with a risk rating, based on the following table:

A	High risk, high spend	C	High spend, low risk
B	High risk, low spend	D	Low spend, low risk

In doing so, we considered the following criteria:

- **Country/region risk:** for countries and regions with a high risk of modern slavery due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors (e.g., poverty). The College references the Global Slavery Index to identify ‘high risk’ countries.
- **Sector/industry risk:** for sectors and industries with a high risk of modern slavery because of their characteristics, products, and processes.
- **Commodity/product risk:** for commodities and products produced with a high risk of modern slavery because of the way they are produced, provided, or used.

As demonstrated below, UTS College takes the above criteria into account, and also factors in the volume and value of our work with suppliers to ensure greater scrutiny where it is most relevant. This assessment produced two classes of first tier suppliers who were potentially susceptible to risk of modern slavery:

- Education agents with offices in ‘high risk countries’ (according to the Global Slavery Index). Our education agents are graded internally in tiers, representing their work with the College. The tiers largely relate to their level of student recruitment to UTS College. Only agents in top tiers with operations in high-risk countries were reviewed.
- Information technology vendors that supply us with IT hardware.

We used the identification of these two classes of supplier to develop a periodic supplier review and questionnaire system.

For this statement, we issued targeted questionnaires to our primary supplier, our IT vendor.

No questionnaires were issued to education agents during this reporting period, as we adopted an alternative due diligence approach focused on strengthening internal controls.

This risk assessment has also informed a more targeted approach to supplier oversight, including the identification of primary suppliers for enhanced due diligence.

Our response to modern slavery risks

Targeted approach to primary suppliers

In contrast to our previous approach to modern slavery, and to support a more targeted and risk-based approach to due diligence, we have introduced a new class of supplier – primary suppliers – who will be the focus of our enhanced due diligence and monitoring activities during the reporting period. This represents a shift from a broad, compliance-based approach to a more focused model that prioritises higher risk and strategically significant suppliers.

This approach enables us to apply deeper scrutiny and more robust assessment of supply chain risks, rather than maintaining a baseline level of compliance across all suppliers.

We have identified one supplier as a primary supplier, our major IT vendor.

This change in approach has been informed by engagement with Anti-Slavery Australia and reflects emerging good practice in modern slavery risk management, which supports targeted and proportionate due diligence.

We recognise that education institutions have a broader role to play in addressing modern slavery. In addition to managing risk within our supply chain, we are committed to contributing to prevention through education. This includes increasing awareness among students and staff, supporting informed decision making, and equipping our community to identify and respond to potential risks.



Our focus for the coming reporting period is to continue monitoring this supplier’s activities. To support this, we have undertaken and will continue to implement the following actions, which will be progressively extended to other primary suppliers in future reporting periods:

Action	Description
Primary Supplier Questionnaire	In addition to any ordinary supplier review that a primary supplier must undertake, we have created and will provide an additional questionnaire to any primary supplier to seek additional details regarding that supplier’s supply chains and operations. This requires suppliers to demonstrate, rather than simply attest to, the effectiveness of their modern slavery controls.
Second-Tier Mapping	Using the Primary Supplier Questionnaire, we will begin to map our second-tier suppliers, with the objective of improving visibility of upstream risks and enabling future engagement.
Contractual Audit	Where available, we will exercise contractual audit rights or explore mechanisms to verify supplier compliance with modern slavery obligations.
Contract Review	We will review all contracts with primary suppliers to ensure that robust modern slavery obligations are included, including requirements to cascade obligations through the supply chain. Where necessary, contracts will be updated to strengthen these provisions.
Competitor Review	We will review the practices of comparable suppliers to understand industry standards and identify opportunities for improvement. Where higher standards are identified, we will engage with the supplier to drive alignment with leading practice.
Policy and Statement Review	We will review the supplier’s Modern Slavery Statement and related policies to ensure alignment with our expectations and assess the extent to which these are supported by operational evidence.



Our policies on modern slavery

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. Our **Vision, Purpose and Code of Ethics** statement provides overarching principles to our business conduct and staff actions. It reinforces our commitment to ethical conduct and human rights, supporting modern slavery prevention through integrity, respect, and accountability.

Our staff **Code of Conduct** outlines expectations for ethical behaviour and now includes specific provisions on Modern Slavery awareness for all staff, volunteers, contractors, subcontractors, and affiliates. It also provides information about the College's Public Interest Disclosure Policy, which supports a safe and confidential process for reporting concerns about unethical or unlawful conduct. All staff are required to acknowledge and agree to comply with the Code of Conduct annually, reinforcing our commitment to transparency, accountability, and ethical practices across all levels of our operations.

Our **public interest disclosure and procurement policies** are designed to support responsible business practices. These are particularly relevant to modern slavery by encouraging transparency, ethical sourcing, and the reporting of any suspected misconduct or exploitation. They have been updated to include principles designed to mitigate the risk of modern slavery and to ensure modern slavery risks are considered during the procurement process, and are available to all staff via the intranet.

We have engaged **Anti-Slavery Australia (ASA)** to support our operations and advise on implementing new strategies to combat the existence of modern slavery. On their advice, we have implemented the primary supplier focus to expand our monitoring and reporting, and we have invited them to participate in key events including Welcome Week to increase awareness of modern slavery among students and staff. We look forward to collaborating further with ASA in the future.

A dedicated **webpage** outlines our commitment to eliminating modern slavery from our business and provides details as to how we are going about this. This, combined with modern slavery information being made available in student handbooks, orientation and events, has strengthened modern slavery awareness for our students.

We continue to consult with UTS regarding a unified approach to modern slavery.



Our due diligence processes on modern slavery

As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain, we take / will take the following actions outlined below during future reporting periods:

Action	Description
Sri Lankan suppliers	We will either implement targeted supplier questionnaires or strengthen contractual obligations to ensure modern slavery risks are appropriately identified and managed by suppliers associated with our Sri Lankan campus.
Grievances mechanisms	We will strengthen grievance channels, and increase awareness of these channels, to ensure safe, accessible, and effective reporting of modern slavery risks and incidents across all operations and supply chains.
Strengthened contractual provisions for suppliers and business partners	We have begun, and will continue, requiring high-value suppliers to warrant that they: ● comply with all Australian Modern Slavery Laws and relevant Foreign Modern Slavery Laws that apply to the supply in the location in which they operate ● will use best endeavours to ensure that there is no modern slavery in the supplier's supply chain or operations ● will notify us if any material risk of modern slavery is identified ● will maintain records in relation to the supplier's supply chains and operations – which must be provided to us on request.
Strengthened contractual provisions for low transaction value suppliers <i>(who are considered high risk)</i>	We require low-value suppliers to warrant that: ● they comply with all Australian Modern Slavery Laws ● they use best endeavours to ensure that there is no modern slavery in their supply chain or operations ● if the supplier identifies any material risk of modern slavery in its supply chain or operations, the supplier must promptly notify us.



Supplier adherence to our values and ethics

We are committed to identifying, managing, and addressing modern slavery risks in our operations and supply chains, including clear processes to investigate and respond when concerns or allegations arise. We aim to ensure that those in our supply chain and contractors comply with our values.

Our contracts with education agents oblige them to take reasonable action to comply with the relevant provisions of the Modern Slavery Act 2018 (Cth) and other legislation preventing financial crime and terrorism funding, by incorporating specific clauses into partnership agreements. These clauses require education agents to take reasonable steps to identify, assess, and address risks of modern slavery within their operations and supply chains. Education agents must also commit to ongoing due diligence, cooperate with the College's reporting obligations, and uphold ethical standards.

Training

To ensure a high level of understanding of the risks of modern slavery in our supply chain and our business, we have:

- implemented mandatory awareness training for all staff during the onboarding process
- made yearly training available to all staff on modern slavery and human rights (on an optional basis).

Training is delivered via an online course run by UTS Online. The course has the functionality to record who undertakes it and we may review these results to ensure that all requisite staff complete the training.

To the extent it is possible, we require our business partners to provide training to their staff and their suppliers and providers.



Grievances mechanisms and remediation

During the reporting period we received no reports of modern slavery through our grievance channels. However, we recognise that this does not necessarily mean there are no risks or instances of modern slavery taking place. We will continue to monitor and take action to remediate appropriately in the future if required.

Our effectiveness in combatting modern slavery

Over this reporting period, we have taken initial steps to measure the effectiveness of our modern slavery risk management framework. Our approach is evolving from a compliance-based model to an evidence-based model, where supplier responses are supplemented with independent information and ongoing monitoring. We have measured the effectiveness of our actions to identify and address instances of modern slavery using the following key performance indicators (KPIs).

- supplier screening: the number and type of issues identified on screening suppliers and subcontractors.
- contract clauses: the number of major contracts with modern slavery provisions.
- public interest disclosure: the number of reported breaches in the past year.
- reviews: the number of reported breaches from annual education agent reviews.
- remedial action: the instances of remedial action required.

In relation to our primary supplier, our due diligence activities went beyond questionnaire responses and included independent validation against publicly reported human rights and modern slavery disclosures. This enabled us to assess not only the existence of controls, but also evidence of their application, including audit findings, corrective action implementation and remediation outcomes.

This approach will be progressively extended to other high-risk suppliers over future reporting periods.



Education agents

Education agents have been under regulatory scrutiny for some time due to the risks they pose. International students are recognised as being socially, legally and financially vulnerable to education agents, vulnerabilities that can be exploited through improper practices. The Australian Government's 2023 Rapid Review into the Exploitation of Australia's Visa System observed that around 75 per cent of international students engage education agents to assist with entry into the Australian education system, many of whom are based overseas.

Education agents pose modern slavery risks due to the nature of their role, including involvement in migration processes, study and working rights, and financial arrangements. These activities create potential risks such as restriction of movement, coercive working conditions linked to visa arrangements, or deceptive practices affecting both students and employees. There is also a risk that education agencies may engage in employment practices that do not meet acceptable labour standards or indirectly expose individuals to exploitation.

Our approach to agents

To manage these risks, we apply a structured vetting and approval process for all new education agents. Each new agent must complete the Education Agent Appointment Form and provide a clear rationale for their proposed engagement. Reference checks are conducted using a structured checklist which includes consideration of ethical conduct and labour practices. All information is assessed through internal review processes to determine suitability prior to engagement.

During this reporting period, we made a deliberate decision not to rely on questionnaires as the primary due diligence tool for education agents. Instead, we focused on strengthening our internal controls and oversight mechanisms to better identify and manage modern slavery risk.

We commenced strengthening our education agent due diligence framework to incorporate a more systematic and risk-based assessment of modern slavery risk across the full lifecycle of the relationship. This includes enhancements to onboarding, contracting and ongoing monitoring processes. This reflects a shift toward embedding modern slavery risk assessment into core business processes, rather than relying on periodic self-reported information.

Key enhancements implemented during the reporting period include:

- strengthened contractual provisions requiring agents to implement appropriate labour and ethical practices, cooperate with due diligence activities, and proactively notify us of any identified risks
- expansion of annual review processes to incorporate modern slavery risk indicators, red flag identification and escalation pathways.

Planned enhancements for the next reporting period include:

- enhanced onboarding checklist questions specifically designed to identify modern slavery risk indicators, including labour practices, subcontracting arrangements and grievance mechanisms
- strengthened and formalised reference check procedures to include targeted modern slavery risk questions and documented assessment criteria.

We maintain long standing relationships with our education agents and apply structured engagement, monitoring and review processes to oversee these partnerships. Annual reviews assess agent performance, compliance with contractual obligations and indicators of modern slavery risk.

Education agents represent a significant component of our supply chain. As such, we continue to monitor modern slavery risk through strengthened due diligence processes and structured annual reviews.

Over the next reporting period, we will continue to formalise these measures into a structured education agent due diligence framework, with the objective of ensuring that modern slavery risk is systematically identified, assessed and monitored across all agent relationships.

Students

As an education provider, we recognise that we have a broader role in addressing modern slavery beyond managing risks in our operations and supply chain. We adopt a proactive approach to prevention through education, recognising our role in influencing awareness, capability and behaviour among students. We are committed to increasing awareness and building capability among our students to identify and respond to modern slavery risks.

Our small class sizes enable close engagement with students, which supports early identification of potential modern slavery risks and vulnerabilities. We support student awareness of modern slavery through engagement with Anti-Slavery Australia, and we provide accessible reporting pathways that enable students to raise concerns confidentially.

Our approach to students

During the reporting period, we strengthened and formalised our student-facing awareness initiatives, including:

- updating our website to include accessible information on modern slavery risks, support pathways and reporting mechanisms
- incorporating modern slavery awareness content into student handbooks
- embedding information on reporting pathways and support services across key student communication channels.

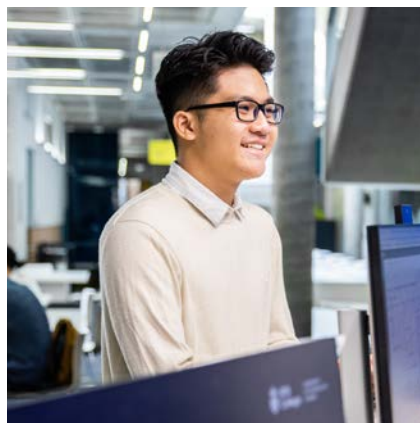
We also engaged with Anti-Slavery Australia to support student awareness initiatives and have implemented their advice on how to engage with our students.

We intend to expand student engagement in future reporting periods. Planned initiatives for the next reporting period include:

- inviting Anti-Slavery Australia to participate in key student events, including Welcome Week activities and the Welcome to Campus Fair
- providing students with practical guidance on identifying indicators of modern slavery and accessing support and reporting pathways
- increasing visibility and accessibility of reporting and support mechanisms available to students.

These initiatives are intended to ensure that students are informed, supported and equipped to respond to modern slavery risks in both their study and work environments.

This reflects our broader approach of embedding modern slavery awareness into the student experience and contributing to prevention through education, consistent with our role as a higher education provider.



IT vendors

We source our hardware supplies primarily from one large, established supplier. A second, much smaller supplier is used occasionally, but their role in our supply chain is minimal and not considered material from a risk or spend perspective.

The two first-tier IT hardware suppliers are based in Australia, with the major supplier a subsidiary of an American company. We have engaged with our major IT hardware supplier to review their approach to managing these risks. While we have confirmed that the supplier has established policies, governance structures and processes to assess and manage these risks, we recognise that modern slavery risks are inherent in its extended global supply chain, which involves offshore manufacturing and component assembly in regions where heightened modern slavery risks exist.

These risks are driven by complex subcontracting structures, reliance on low-cost labour and known industry risks within electronics manufacturing supply chains. As a result, we have identified our major IT vendor as a primary supplier, requiring enhanced due diligence and ongoing monitoring during the reporting period.

Our approach to IT vendors

We conducted enhanced due diligence on our primary IT hardware supplier through a detailed modern slavery questionnaire and a review of publicly available disclosures, including its most recent Modern Slavery Statement and human rights due diligence reporting. This approach was designed to assess both the existence of controls and evidence of their effectiveness in practice.

This review confirmed that the supplier operates a comprehensive global human rights due diligence framework aligned to international standards, including the Responsible Business Alliance Code of Conduct, and applies risk-based supplier screening, audit programs and corrective action processes across its supply chain.

Our assessment identified that modern slavery risks remain inherent in the supplier's multi-tier global supply chain, particularly in its electronics manufacturing, and its use of migrant labour and upstream raw materials. We also noted that the supplier has identified instances of labour practice non-conformances through its audit program and has implemented corrective action plans and remediation processes, including reimbursement of recruitment fees where required.

The identification and remediation of these issues provide evidence of an active and functioning control environment, rather than reliance solely on policy commitments.

While the supplier demonstrates a mature control environment, we recognise that residual risk remains due to the scale, geographic spread and complexity of its supply chain. Accordingly, we have classified this supplier as a primary supplier and will continue enhanced monitoring, including ongoing review of audit outcomes, remediation activity and compliance with contractual obligations.



Further steps

In addition to those further steps identified throughout this report, we have identified the following actions. These actions are based on our review of the effectiveness of the steps we have taken to identify, assess and address modern slavery risks in our operations and supply chains:

- undertake further investigations into our operations and supply chain
- build awareness and understanding of the issue by conducting more education and training for staff
- enhance our ability to assess risk by using external resources, experts, and software to assist with modern slavery risk assessment.

We have been advised that UTS has recently submitted a Modern Slavery Statement to the Australian Border Force. While we are not covered by the UTS statement and are a separate legal entity with a different procurement and supply chain profile, we will continue to consult with UTS on an annual basis.

Board approval

This **Modern Slavery Statement** is made by UTS College Limited ACN 001 425 065 for the financial year ending December 2025 (being FY2025).

This statement was approved by our Board of Directors on 25 June 2026.

Signature of Chief Executive Officer	
Name	Morwenna Shahani
Date	25 June 2026





UTS
College

**UNIVERSITY
OF TECHNOLOGY
SYDNEY**