Modern Slavery Statement

1 Introduction

This Statement is made by Open Universities Australia Pty Ltd (ACN 053 431 888) (**OUA**) pursuant to the *Modern Slavery Act 2018* (Cth) for the financial year ending 31 December 2025 (**Reporting Period**). The Statement outlines OUA's commitment to identifying and mitigating modern slavery risk in our operations and supply chains.

Our values, set out below, are in line with the commitments espoused in this Statement.

act for customer

care for each other

continuously improve

We are pleased to submit this Statement to the Australian Border Force to demonstrate how we understand our modern slavery risks, the steps we have taken and our plans going forward.

2 Our structure, operations and supply chains

2.1 Our structure

OUA is a registered charity based in Melbourne at 700 Collins Street, Docklands VIC 3008, and is owned by 7 Australian universities: Curtin University, Griffith University, Macquarie University, Monash University, RMIT University, Swinburne University of Technology and Adelaide University. Our Board of Directors comprises nominee directors from each of those universities.

Our organisation has a number of core functions, including Student Services, Partner Services, Product Management, Software Engineering, Marketing, and Corporate Services with cross-functional teams aligned to delivering on Student Experience, Partner Experience and OUA employee experience. OUA owns 3 dormant shelf companies that do not trade and have never traded.

2.2 Operations

Open Universities Australia (OUA) is a not-for-profit organisation that facilitates access to online tertiary education in Australia. Its purpose is to expand access to education by enabling students to enrol in university study through flexible, online study and open entry pathways.

OUA partners with 26 Australian universities to offer a broad range of study options, including over 2,700 subjects and 900 qualifications across multiple disciplines. The course portfolio is dynamic and updated regularly in line with partner offerings.

OUA employs approximately 200 staff, with 84% engaged full-time, 15% part-time, and 1% on a casual basis. The organisation supports more than 30,000 students annually and has assisted over 540,000 students since commencing operations.

Our current university partners are Adelaide University, Australian Catholic University, Australian National University, Bond University, Charles Sturt University, Curtin University, Edith Cowan University, Flinders University, Griffith University, James Cook University, La Trobe University, Macquarie University, Murdoch University, RMIT University, Swinburne University, University of Tasmania, Southern Cross University, The University of Newcastle, Torrens University Australia, University of New England, The University of Notre Dame Australia, University of Canberra University of Southern Queensland, University of the Sunshine Coast and University of Queensland.

2.3 Supply chain

During the Reporting Period, we had approximately 200 suppliers. We procure goods and services across the following areas (in alphabetical order):

- Accounting software
- Audit services
- Beverage supplies
- Clothing supplies
- Computer hardware
- Consulting services
- Courier services
- Disability support services
- Employee Assistance Program services
- Education services
- Electricity supplies
- Food supplies
- Higher education services
- Identity verification services
- Indoor plant supply and service
- Industry body membership subscription
- Insurance services
- IT services
- Legal services
- Market research services
- Marketing services
- Office cleaning services
- Office equipment
- Office fit out services
- Office supplies
- Payroll services
- Postal and courier services
- Premises lease
- Records management services
- Software services
- Transport services

Our higher education providers are Australian, and most of our other suppliers are too, although some may supply goods and services that originate from other jurisdictions. We utilise the services of some global software companies which are American, although some of these companies use foreign subsidiaries including those located in Singapore, the UK and parts of Europe. We also use a couple of professional services firms based in New Zealand.

3 Modern slavery risks in our operations and supply chains

3.1 In our operations

In seeking to identify the modern slavery risks in our operations and supply chain, we considered the potential for our business to cause, contribute to, or be directly linked to modern slavery. Given the fact that our operations are based in Australia, we assess our risk of modern slavery in our operations as low for two reasons. First, the risk of modern slavery in our direct employment of workers is considered low having regard to the fact that all of our staff are employed directly by OUA and work primarily in office-based roles. Second, our staff are also protected by and are afforded rights under the Commonwealth Fair Work legislation.

3.2 In our supply chain

As noted in section 2.3 above, the bulk of our direct suppliers are based in Australia (approximately 82% in the reporting period) and 99.8% of our expenditure is on the supply of services. Accordingly, the modern slavery risk within the first tier of our supply chain is likely to be low overall. While we are mindful that modern slavery risks are inherent in the supply chain behind the corporate merchandise we purchase, the lithium in our laptops and smartphones, the food and beverages we serve on our premises, these products accounted for less than 0.2% of our expenditure in 2025.

During the Reporting Period, approximately 58% of our annual procurement spend was directed to Australian higher education services. We consider that the risk of modern slavery practices occurring within the operations of these institutions is likely to be low given that they are required to comply with the legal framework regulating employment practices in Australia. Like us, their reliance on technology will mean that a particular risk in their supply chains is in IT and telecommunications. However, we rely on, and defer to, the descriptions of modern slavery risks in the modern slavery statements submitted by the universities (for those required to report) listed in section 2.2 above.

4 Actions taken to assess and address modern slavery risks

4.1 In our operations

We are committed to ensuring that our employees are paid in line with market rates. Our approach includes the consideration of market benchmarks (AON), internal relativities and performance-based rewards. Even though we are a not-for-profit organisation, we benchmark against commercially focused organisations to hire and keep high calibre people.

Our People and Culture team conduct checks to ensure that those we recruit are of legal working age and are working of their own free will. Furthermore, our Code of Conduct sets out the expected behaviours of all our employees, namely respect, fairness and high social and ethical standards. We do not tolerate discrimination or harassment and endeavour to sustain the health, safety and wellbeing of our employees and contractors.

Our Whistleblowing Policy provides a way for our employees to report their concerns confidentially, freely and without fear of repercussion. We did not receive any reports of actual or suspected instances of modern slavery via our reporting channels during the Reporting Period. If, hypothetically, it was found that OUA had caused or contributed to modern slavery, we would seek to remediate the impact by taking a person-centred approach protecting the safety and wellbeing of the affected person and then undertaking a full investigation of the situation to ensure that an appropriate corrective action plan is implemented.

4.2 In our supply chain

Foreign suppliers accounted for approximately 18% (by value) of our expenditure in 2025. US software suppliers make up approximately 95% (by value) of our foreign expenditure.

OUA applies a structured, risk-based methodology to identify and assess modern slavery risks within its supplier base. This methodology is designed to ensure consistency, transparency, and alignment with the *Modern Slavery Act 2018* (Cth).

Supplier risk is assessed across four key dimensions:

- **Country risk** – the level of modern slavery risk in the jurisdictions where labour is sourced, informed by external indices including the *Global Slavery Index* (2023) and the *US Trafficking in Persons Report* (2025)
- **Sector risk** – the inherent risk associated with the type of goods or services provided, including factors such as labour intensity and workforce characteristics
- **Engagement model risk** – how labour is structured and supplied, including the use of labour hire, outsourcing, or subcontracting arrangements
- **Worker vulnerability** – the degree to which workers may be exposed to exploitation, based on factors such as skill level and language barriers that may adversely impact their ability to exercise workplace rights.

These factors are assessed using a standardised scoring model to produce an overall supplier risk rating. The methodology is supported by defined weightings and escalation rules to ensure higher-risk scenarios are appropriately identified.

OUA supplements this model with the application of professional judgement, particularly where specific risk indicators or mitigating factors are identified. Suppliers assessed as higher risk may be subject to enhanced due diligence, contractual controls, and ongoing monitoring.

Beginning in our second reporting period, we identified suppliers operating in countries assessed as having a higher risk of modern slavery. For those suppliers, we applied the above methodology and assessed them as being medium risk and carried out enhanced due diligence. During the reporting period, there were a total of 3 suppliers assessed as medium risk (operating in India and the Philippines). No suppliers have been identified as high or very high risk.

In all cases the supplier was compliant with the Australian legislation. For two new suppliers that we onboarded during the reporting period, we:

- reviewed the supplier's answers to our Supplier Questionnaire prior to contracting; and
- included a modern slavery compliance clause in the contract (requiring compliance with our Supplier Code of Conduct).

The third (existing) supplier has a modern slavery compliance clause in the contract.

5 Assessing the effectiveness of our actions

We will use key performance indicators (KPIs) to measure how effective our actions to identify and address modern slavery practices in any part of our operations and supply chains have been. Over this reporting period, we assessed the effectiveness of our actions across four key performance areas:

- Governance & due diligence
- Procurement & supply chain
- HR practices, training & education
- Grievances and reporting.

Against each of these focus areas we have developed KPIs that we will use to assess the effectiveness of our actions. These include: the percentage of higher risk suppliers subjected to due diligence and risk assessment; the percentage of higher risk supplier contracts with modern slavery clauses; completion rate for modern slavery awareness training; and the number of modern slavery cases identified and remediated.

KPI	2025 RP	Comment
percentage of higher risk suppliers subjected to due diligence and risk assessment	100%	
percentage of higher risk supplier contracts with modern slavery clauses	100%	
completion rate for modern slavery awareness training	100%	
number of modern slavery cases reported to OUA	0	

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement.

6 Consultation and approval

As OUA's shelf companies remain dormant, it was not necessary for us to address the mandatory reporting criteria requiring every statement to "describe the process of consultation with any entities the reporting entity owns or controls."

This statement was approved by the Board of Directors on 21 May 2026.

Signed,

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Professor S. Bruce Dowton
Chairman

Dated this 27 day of May 2026