

Modern Slavery Act Statement

For the year ended 31 December 2025

Southern Cross University and its Controlled Entities

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Introduction

Southern Cross University is committed to identifying, assessing and addressing the risk of modern slavery across its operations and supply chains. This includes risks that may arise through procurement activities, student-related programs, research partnerships and commercial arrangements.

As a multi-campus public university operating across Australia and engaging with international partners, the University recognises that modern slavery risks can arise in complex supply chains and in areas where there is limited direct oversight of labour practices.

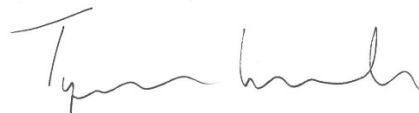
The University does not consider itself to be exposed to systemic modern slavery risks across its core operations. However, consistent with a risk-based approach under the *Modern Slavery Act 2018* (Cth), it recognises that heightened risks may arise in specific sectors, geographic regions and activities where there is limited visibility of labour conditions or reliance on third parties.

During the reporting period, the University continued to strengthen its approach through supplier risk monitoring, sector collaboration, refinement of internal processes and increased awareness across relevant staff groups. This work builds on prior years and is part of an ongoing, risk-based approach to continuous improvement.

This Statement is prepared in accordance with the *Modern Slavery Act 2018* (Cth) and the *Modern Slavery Act 2018* (NSW). It is made on behalf of Southern Cross University and its controlled entities and was approved by the University Council on 15 June 2026.



Sandra McPhee AM
Chancellor
Southern Cross University



Professor Tyrone Carlin
Vice-Chancellor and President
Southern Cross University

Part 1: Reporting Entity and Structure

Southern Cross University is established under the *Southern Cross University Act 1993* (NSW). The University is governed by its Council, which is responsible for overseeing strategy, risk and compliance.

This Statement covers Southern Cross University (ABN 41 995 651 524) and its controlled entities:

- **Southern Cross Campus Services Limited**
- **SCU Ventures Pty Limited**

These entities support the University's operations, including campus services and the delivery of education programs in metropolitan locations.

For the purposes of this Statement, references to "the University" include all controlled entities.

Structure
Reporting Entity Southern Cross University ABN 41 995 651 524 The University is a statutory body established under the <i>Southern Cross University Act 1993</i> (NSW). The University is registered as a charity with the Australian Charities and Not-for-Profit Commission.
Controlled Entities Southern Cross Campus Services Limited ('Campus Services') ACN 003 082 406 ABN 57 003 082 406 Campus Services is an Australian company limited by guarantee, incorporated in 1986, it has been wholly owned and controlled by the University since 1993. Campus Services is registered as a charity with the Australian Charities and Not-for-Profit Commission.
SCU Ventures Pty Limited ('SCU Ventures') ACN 165 638 719 ABN 81 165 638 719 SCU Ventures is an Australian private company, wholly owned and controlled by the University since 1 December, 2023. SCU Ventures is registered as a charity with the Australian Charities and Not-for-Profit Commission.

Part 2: Operations and supply chains

Operations

The University's core activities are teaching and research, supported by administrative and commercial functions. It operates campuses in regional and metropolitan locations across Australia, with additional partnerships supporting international student recruitment and program delivery.

Controlled entities contribute to:

- student accommodation, hospitality and fitness services; and
- delivery of education programs in metropolitan markets.

Supply Chains

The University engages a broad range of suppliers to support its operations, including providers of goods and services such as construction, information technology, facilities management, professional services and student recruitment.

These supply chains include both domestic and international suppliers and often involve multiple tiers of subcontracting, particularly in higher-risk categories such as construction, information and communication technology, and manufacturing. This complexity may reduce visibility over labour practices beyond Tier 1 suppliers and informs the University's prioritisation of risk-based due diligence activities.

Procurement is undertaken in accordance with legislative obligations and internal policies. The University also accesses sector-wide procurement arrangements, including NSW Government contracts and collaborative university frameworks.

Modern slavery considerations are embedded within the University's procurement governance framework, including alignment with applicable NSW procurement requirements and sector guidance.

Part 3: Modern Slavery risks in operations and supply chains

Risks in Operations

Modern slavery risks within the University's operations may arise in specific contexts where there is limited visibility or control over labour conditions. These include:

- **International student recruitment and support**, where students may be vulnerable to exploitation in employment or accommodation
- **Student placements**, particularly where hosted by external organisations or in offshore settings
- **Research and partnership activities**, including collaborations in higher-risk jurisdictions

These risks are not considered systemic but require active monitoring and appropriate controls.

Risks to Students

The University recognises that international students may be exposed to heightened risks of exploitation due to factors such as visa dependency, financial pressures, unfamiliarity with Australian workplace rights, and reliance on third parties for employment and accommodation.

To mitigate these risks, the University adopts a proactive approach which includes:

- embedding modern slavery considerations into international student recruitment and support practices;
- monitoring risks associated with education agents and third-party providers;
- providing accessible information to students on workplace rights and support services; and
- maintaining pathways for students to raise concerns confidentially and access support where required.

The University continues to strengthen its understanding of modern slavery risks in relation to international students, including risks associated with employment, accommodation and third-party arrangements. This includes ongoing collaboration with the higher education sector and external stakeholders to identify emerging risks and improve prevention and response measures.

Risks in Supply Chains

The University's primary exposure to modern slavery risk arises through its supply chain, particularly in sectors and regions with known higher risks. These include:

- construction and facilities-related services
- information and communication technology supply chains
- scientific and laboratory equipment

- cleaning and security services
- international recruitment services

These sectors are considered higher priority risk areas, as they often involve complex subcontracting arrangements, offshore production, and extended supply chains where risks of forced labour, exploitation and inadequate working conditions are more prevalent.

Supplier Risk Assessment

During the reporting period, the University used supplier analytics provided through the ArcBlue platform, supported by its participation in the Australasian Universities Procurement Network (AUPN).

This approach combines country, sector and spend data to assess supplier risk. Based on available data, the University's exposure is assessed as low to moderate relative to sector benchmarks, with the majority of suppliers rated as low risk and a smaller number identified in higher-risk categories requiring further attention.

Top 10 Level 4 Category Risk by Suppliers

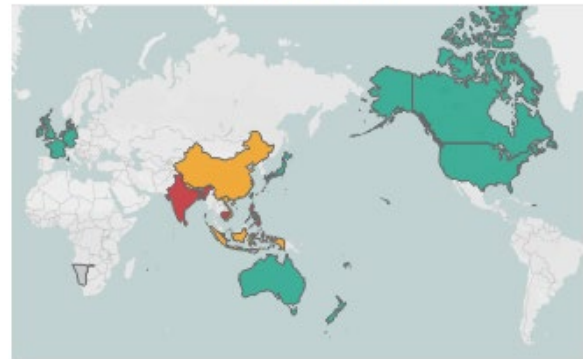
Top 10 Level 4 Categories	% of Total Suppliers	No. Suppliers	Risk
Medical and Lab Consumables	25.16%	197	High
Student Recruitment	4.34 %	34	Medium
Scientific Equipment	3.70%	29	High
Software Licences	3.58%	28	High
Couriers, Freight	2.68%	21	High
Software As A Service	2.43%	19	High
Professional Subscriptions	2.43%	19	Low
Electronic Resources & Databases	2.30%	18	Medium
Electrical Services	2.17%	17	Medium
Building Repair & Construction	2.04%	16	High

Unique SCU suppliers in each Country Risk

Unique Suppliers	Risk
25	High
26	Medium
731	Low
2	Unknown

Source: ArcBlue Consulting Analytics Tool

Country Risk



Part 4: Actions taken to assess and address risks

Due Diligence and Screening

The University undertakes a range of due diligence activities to identify and assess modern slavery risks, including:

- supplier risk profiling using analytics platforms
- targeted supplier questionnaires for higher-risk categories
- contract terms addressing modern slavery obligations
- monitoring of supplier performance and compliance

Where higher-risk suppliers are identified, further assessment and engagement is undertaken.

Where risks are identified, the University applies a structured escalation and response approach, which may include:

- engagement with suppliers to seek clarification and corrective action
- requiring suppliers to implement remediation measures within defined timeframes
- ongoing monitoring of supplier performance
- consideration of contract termination or disengagement where risks are not adequately addressed

This approach reflects the University's expectation that suppliers actively identify, address and remediate modern slavery risks within their own operations and supply chains.

Modern slavery considerations are embedded within the University's procurement governance framework, including alignment with applicable NSW procurement requirements and sector guidance.

Sector Collaboration

The University continues to participate in sector initiatives through AUPN, including:

- shared supplier risk assessments
- category-based reviews (e.g. medical consumables, ICT supply chains)
- collaborative engagement with suppliers and industry bodies

Through its participation in AUPN, the University contributes to a coordinated sector-wide approach. In 2025, the program reviewed over 180,000 suppliers representing approximately \$14 billion in combined spend, enabling universities to identify and prioritise higher-risk categories and suppliers at scale. Participation in these initiatives allows the University to leverage sector expertise and collective influence.

The AUPN's program of Supplier Assessment Questionnaires (SAQ) in the laboratory and medical consumables category revealed a broad spectrum of understanding of modern slavery. In 2025, further engagement was conducted with five suppliers that presented the highest levels of risk in the medical and laboratory consumables category.

In the ICT category, 22 universities participated in an Electronics Watch pilot, monitoring 27 factories across seven countries. Common risks identified included legal wages, health and safety, discrimination, excessive hours, and forced labour. Remediation is underway in 13 cases, and two instances required direct university engagement to resolve outstanding issues. Southern Cross University was not one of those universities.

This supplier approach by category will continue throughout 2026. The ArcBlue portal provides access to all detailed supplier responses.

Industry Benchmarking and Collaboration

Southern Cross University maintains membership with the AUPN and collaborates with the higher education sector to strengthen and uplift procurement capability across 41 Australian and New Zealand universities.

The program leverages collective spend, market influence and expertise to maximise purchasing power, drive ethical procurement, and support compliance with the *Modern Slavery Act 2018* (Cth).

The AUPN Modern Slavery Program operates across several key pillars, including risk data, capability uplift, supplier engagement, industry collaboration and third-party support. These initiatives enable the University to access shared data insights, participate in targeted engagement activities, and contribute to the development of sector-wide responses to modern slavery risks.

Agreements, Policies, and Procedures

The University continued to review and update its suite of policies and procedures throughout the reporting year. Respect for Human Rights, including alignment with applicable legislation, are embedded throughout all University policies and procedures.

Policy	Relevant references
International Education Agent Management Policy and Procedures	This Policy sets out Southern Cross University's requirements for the appointment, management, and termination of its international education agents (Agents). It requires taking reasonable steps to identify, assess and address risks of Modern Slavery practices in the operations and supply chains used in the recruitment of international students, as outlined in the Agent Agreement.
Research Collaboration Procedures	Ensure that any research collaboration complies with obligations under the Modern Slavery Act.
Code of Conduct	Integrity demonstrated through advancing human rights and our commitment to provide opportunities for students and staff in an inclusive, culturally safe environment – clause (5) b Respect for Law and University Governance – clauses (7) – (8) Ethical decision making – clause (31)
Harassment, Bullying, and Discrimination Prevention Policy	The policy sets out the University's commitment to ensuring all staff and students are treated fairly and with dignity and respect and providing an environment free from harassment, bullying, and unlawful discrimination.
Sexual Misconduct (Prevention and Response) Policy	The University aims to provide an environment where all members of the University are treated fairly and with dignity and respect, free from Sexual Misconduct.

Policy	Relevant references
Work Health and Safety Policy and associated procedures	The policy promotes the health, safety, and welfare of all University employees, students, contractors, and visitors to the University.
Whistleblowing Policy and Procedures	The University is committed to undertaking its activities to the highest standards of honest and ethical behaviour. The policy sets out the support and protection available to those who report wrongdoing.
Fraud and Corruption Prevention Policy	The policy outlines how the University detects, reports, assesses, and deals with possible Fraud and Corruption and supports the University's Code of Conduct in promoting a fair and honest working and learning environment.
Procurement Policy	The policy articulates a key procurement principle, Social Procurement – that University funds are expended efficiently, economically, and ethically, including respect for stakeholders' interests, the rule of law, and human rights – and the University's commitment to identifying and mitigating the risk of Modern Slavery.

Southern Cross University's legal agreement templates – including Purchase Order Terms and Conditions, Consultancy Agreements, Research Agreements and International Student Agent Agreements – incorporate modern slavery clauses that set out the University's requirements relating to modern slavery and compliance with applicable legislation. These templates are reviewed regularly to ensure they remain up to date with changing legal and compliance requirements.

Education and Awareness

During the reporting year, the University expanded its modern slavery capability uplift activities, including the introduction of an online certified training course available to relevant staff.

This is supported by participation in AUPN-led initiatives, including sector forums, knowledge-sharing activities and access to micro-credential training programs developed in collaboration with external organisations such as ACRATH. These programs support

increased awareness and capability across both staff and students in identifying and responding to modern slavery risks.

The University continued to maintain its [modern slavery webpage](#), which is available to all staff and students. The page outlines its commitment to preventing modern slavery in all its forms and provides useful information and resources for stakeholders.

Part 5: Assessment of actions

The University assesses the effectiveness of its modern slavery response through:

- monitoring supplier risk ratings and trends over time
- completion of due diligence activities
- staff training participation
- monitoring of reported concerns or incidents

These indicators are reviewed periodically to inform ongoing improvements to processes and controls and are considered alongside qualitative insights, including supplier engagement outcomes and participation in sector initiatives, to assess the effectiveness of the University's approach.

Outcomes are reported through internal governance processes to inform ongoing improvements and support alignment with evolving sector expectations and regulatory guidance.

Part 6: Consultation with Controlled Entities

The University consulted with its controlled entities in preparing this Statement. This included:

- engagement with senior management;
- confirmation of relevant policies and procedures being applied;
- shared use of procurement and risk assessment processes; and
- ongoing reporting and communication throughout the reporting period.

Part 7: Other relevant information

Next Steps

In the 2026 reporting year, in accordance with the *Modern Slavery Act 2018* (Cth), the University plans to:

- Review modern slavery clauses used across procurement documentation and contracts to ensure they are relevant, robust, and aligned with the legislative and sector expectations.
- Continue to build awareness of the *Modern Slavery Act 2018* (Cth) and associated responsibilities across the central Procurement Services team and wider University by ensuring all staff involved with procurement practices undertake compulsory modern slavery training.
- Continue to utilise the ArcBlue Modern Slavery Solution tool to monitor risk and identify any instances of modern slavery in our supply chain, which includes conducting data analysis for the controlled entities.
- Continue to benefit from collaborative activities planned for 2026 by the AUPN, including:
 - Completion of a detailed review into modern slavery risk in the medical gloves sector.
 - Continue with Electronics Watch Pilot sector-wide engagement to address identified issues in the electronics supply chain.
 - Attend topic-specific groups to support the development of guidance, resources and sector-wide approaches such as Anti-Slavery forums with subject matter expert guest speakers and university case study presentations.
 - Introduce additional sector-specific micro-credentials training modules for health, social work, education and law/criminology for university staff and students.
 - Sector Collaboration on International Student Risk.
- Continued participation in sector-wide initiatives addressing modern slavery risks affecting international students, including collaboration on research and guidance informed by student experience and sector data.

The University will continue to align its approach with evolving Commonwealth and NSW expectations, including ongoing engagement with sector guidance and the NSW Anti-Slavery Commissioner's framework.