Modern Slavery Statement
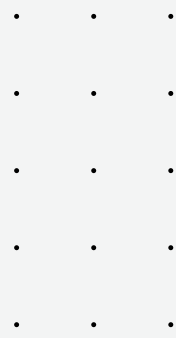
swinburne.edu.au

From our Vice-Chancellor

Driven by our vision of people and technology working together to build a better world, Swinburne University of Technology believes in the power of universities to contribute to the elimination of modern slavery globally. Swinburne recognises that freedom from slavery is a fundamental human right and the university opposes all forms of slavery and enforced labour.

As we pursue the end of slavery around the world, the university is taking steps to identify and eliminate any risk of these deplorable practices within the university's operations, its suppliers, and partner organisations.

In 2024, Swinburne maintained a strong focus on addressing modern slavery risks across its supply chain by collaborating with suppliers, partners, and education sector peers. Our Procurement team have continued to upskill and embed modern slavery education and action into every part of their work, mobilising cross-university teams to ensure risks are identified and acted on.

This year, a new modern slavery tool was implemented to determine risk and improve supply chain transparency. This has supported stronger due diligence actions and strengthened our ability to work with suppliers to better understand and address modern slavery risks. Reviews have been undertaken for many key high-risk tenders and Swinburne's standard contract templates include clauses addressing modern slavery.

As an educational institution, Swinburne emphasises raising awareness and educating students and staff on modern slavery. Throughout the year, stakeholders, staff, and students were informed about the university's actions to address modern slavery and what individuals can do. I am proud that Swinburne staff continue to take a leadership role in the sector when it comes to this important work.

The university also recognises the potential to influence companies positively through its investments, focusing on human rights issues including modern slavery, climate change, and sustainable development.

By fostering an inclusive and supportive culture, Swinburne aims to drive positive social outcomes through teaching, research, partnerships, investments and operations. We continue to take our responsibility to positively influence modern slavery seriously, leveraging all the tools at our disposal.

I look forward to Swinburne's continued efforts and innovations in addressing this serious global issue.

Professor Pascale G Quester
Vice-Chancellor and President

This statement covers the period
1 January 2024 to 31 December 2024

This statement was approved by the University Council of Swinburne University of Technology on 27 May 2025.

Professor Pascale G Quester
Vice-Chancellor and President

Acknowledgement of country

We respectfully acknowledge the Wurundjeri People of the Kulin Nation, who are the Traditional Owners of the land on which Swinburne's Australian campuses are located in Melbourne's east and outer-east, and pay our respect to their Elders past, present and emerging.

We are honoured to recognise our connection to Wurundjeri Country, history, culture, and spirituality through these locations, and strive to ensure that we operate in a manner that respects and honours the Elders and Ancestors of these lands.

We also respectfully acknowledge Swinburne's Aboriginal and Torres Strait Islander staff, students, alumni, partners and visitors.

We also acknowledge and respect the Traditional Owners of lands across Australia, their Elders, Ancestors, cultures, and heritage, and recognise the continuing sovereignties of all Aboriginal and Torres Strait Islander Nations.

About Swinburne University of Technology

Swinburne University of Technology is a dual-sector institution, defined and inspired by technology and innovation and renowned for our strong industry and community engagement.

Swinburne aspires to be the prototype of a new and different university – one that is truly of technology, innovation and entrepreneurship, and proud of it.

With a vision to bring people and technology together to build a better world, our people are driven by a shared purpose: to create tomorrow's technology and the human capital and talent required for a digital, tech-rich future.

Central to achieving our vision are four moon shots, which are our bold and ambitious objectives designed to embolden and energise our staff and partners to make a real difference in the world. Our moon shots are:

1. **Every Swinburne learner gets a work experience**
2. **Every Swinburne graduate gets a job**
3. **Every Swinburne partner gets a tech solution**
4. **Swinburne is the prototype of global best practice.**

Swinburne has an international reputation for quality research that connects science and technology with industry and the community, reflected in prestigious rankings which place Swinburne in the top one per cent of universities worldwide and the top 50 young universities under 50 years old.

Our researchers are collaborating with industry, communities, and government to co-create the technology solutions our world needs. As part of our strategic plan, we are injecting significant research investment into flagship areas where Swinburne is a world leader: Space and Aerospace Technology; Innovative Planet: smart solutions for sustainability; Medical Technology and Health Innovation; Innovative Society; Manufacturing Futures; and Digital Capability.

As a dual-sector university, Swinburne provides higher education and vocational education. We offer courses in a broad range of disciplines including arts and humanities, aviation, built environment and architecture, business, design, education, engineering, English language and study skills, film and television, games and animation, health sciences, occupational therapy, nursing, biomedical sports science, psychology, information technology, law, media and communications, and science.

Our close ties with industry provide students with opportunities for valuable workplace experiences during their studies. Industry representatives inform and shape our curriculum and Swinburne continues to lead the sector in our approach to ensuring students are job-ready by offering guaranteed work integrated learning experiences for all students.

Swinburne has three campuses located in the eastern suburbs of Melbourne at Hawthorn, Croydon and Wantirna. We have a fourth campus in Sarawak, Malaysia, as well as transnational education locations in Sri Lanka and Vietnam, each offering a small suite of sought-after Swinburne courses.

Swinburne is also a leader in online learning in collaboration with partners through Swinburne Online and Swinburne Open Education.

Swinburne holds an investment portfolio that is managed by a third-party specialist investment adviser under the direction of the Council and relevant sub-committees, and in line with the university's Responsible Investment Charter.

Reporting entity

The parent entity is Swinburne University of Technology (ABN 13 628 586 699), which is registered as an incorporated charitable institution with the Australian Charities and Not-for-profits Commission (ACNC). No other entity owns a share of Swinburne University of Technology.

Controlled Entities as at 31 December 2024

Swinburne Commercial Consulting (Nanjing) Co. Ltd
Swinburne Intellectual Property Trust
Swinburne International (Holdings) Pty Ltd
Swinburne Student Amenities Association Ltd (trading as Swinburne Student Life)
Swinburne Ventures Limited

Consolidated revenue for Swinburne and its controlled entities for the period 1 January 2024 to 31 December 2024 was $961 million.

Our commitment to sustainability and reconciliation

Swinburne recognises the importance of preparing tomorrow's leaders and decision makers to contribute to a sustainable future.

Our commitment to sustainability remains one of our core values. We are committed to fostering positive social, educational and environmentally sustainable change. We take a universal approach to sustainability, considering the physical and virtual environment we operate in, as well as our people, practices, and research.

Swinburne has made several commitments and taken action to support a sustainable future. In 2018, Swinburne committed to the United Nation's Sustainable Development Goals (SDGs). Joining organisations from around the globe, Swinburne committed to the 17 SDGs that aim to transform our world through ending poverty, protecting the planet, and ensuring prosperity for all on the road to 2030. SDG 8.7 calls for an end to modern slavery by 2030.

Swinburne was the first Australian university to achieve 'Elevate' status for our second Reconciliation Action Plan (RAP), the highest level of endorsement by Reconciliation Australia. Our third Reconciliation Action Plan 2020–2023 was also endorsed as an Elevate RAP, signifying Swinburne's strong commitment to reconciliation. Swinburne's next RAP plans to further impact genuine change. It has been developed collaboratively throughout 2024 and is currently being reviewed by Reconciliation Australia.

Swinburne was one of the first universities in Australia to implement a responsible investment charter. Implemented in 2015 and updated and approved annually, the Charter ensures environmental and social impacts are prioritised in our university's investment choices. Regular reporting on performance to the Charter is delivered by our investment manager to our governing bodies, who provide oversight and governance on Swinburne's investments.

In December 2019, Swinburne committed to becoming carbon neutral by 2025. The University is on track to deliver this commitment, expecting third party independent verification of its carbon neutrality in July 2025 via Climate Active.

In January 2020, we became the first university in Victoria to sign the Global Climate Emergency Letter in recognition of the need for a drastic societal shift to combat the growing threat of climate change. Since then several initiatives have been delivered, including 100% renewable electricity supply across all Australian campuses, LED lighting upgrades across all Australian campuses, offsetting of carbon offset from airflights to be carbon neutral, optimisation of heating, ventilation and air-conditioning systems, and a sustainable procurement framework. In combination, initiatives deployed to date have reduced the university's carbon footprint by over 60%, with planning and initiatives underway to reduce this further as well as increasing our maturity in carbon reporting.

For further details on our initiatives in this area, please see:

www.swinburne.edu.au/about/strategy-initiatives/sustainability-environment

Our risk and governance frameworks

Under the *Swinburne University of Technology Act 2010*, Council maintains responsibility and oversight of the university's Risk Management Policy and Framework through its Audit and Risk Committee.

The Vice-Chancellor, Professor Pascale Quester, is the President and Chief Executive Officer of the university and is responsible for the conduct of the university's affairs in all matters. The Council, Audit and Risk Committee, Executive and senior leaders support the desired risk culture by demonstrating consistent mindsets and behaviours.

Swinburne's approach to managing risk is aligned to relevant international risk management standards and the Victorian Government Risk Management Framework. It promotes an open and proactive approach to managing risk that considers both threats and opportunities, and is one where risk is appropriately identified, assessed, communicated, and managed across all levels of the University.

The Executive Group, senior management and risk partners across the University are responsible for driving a positive risk culture through initiatives and processes. The University's Enterprise Risks are reviewed every year to ensure they appropriately reflect the current landscape and the risks and challenges impacting the execution of the University's strategy. Management must provide mitigating strategies against the identified risks with quarterly reporting to the Audit and Risk Committee.

The University's Risk Appetite Statements articulate the amount of risk that the university is willing to accept or retain, to achieve its strategy. Swinburne has a low-risk appetite for any activity or action which may contravene its environmental/social responsibility and for non-adherence to legislative and regulatory requirements. Furthermore, Swinburne has zero appetite for deliberate ethical breaches perpetrated in the pursuit of its objectives, and for bribery corruption and fraud, regardless of local customs in other jurisdictions.

Corporate governance at the university is the set of values, principles, and processes by which the university is directed and controlled. The university's corporate governance underpins the behaviours and practices expected of Council, each member of Council, all staff, and the university in carrying out their responsibilities. The aim of the university's corporate governance is to ensure that good, ethical decisions are made by the right person.

Our supply chain

Swinburne procures goods and services from a broad range of industries that support the running of our physical campuses (such as cleaning, security, maintenance), enable the effective delivery of teaching and research (such as IT software, library subscriptions, laboratory consumables) and generally supports the operations of the university (such as advertising, recruitment, office supplies).

In 2024, the university engaged 13,952 to supply 95,627 transactions of goods or services (of which 35,332 of these were carried out via corporate card). **Table 1** highlights the proportion of spend across the different categories of spend by the university.

In 2024, 88% of Swinburne's supply chain spend was with Australian-based suppliers, including a considerable proportion located in the local areas surrounding the university's Melbourne campuses. Internationally, Swinburne has supply arrangements with businesses located across Europe, North America, and Asia. **Table 2** outlines the location of the university's most common suppliers outside Australia.

Typically, Swinburne establishes and maintains long-term relationships with high value and/or strategic suppliers. Swinburne aims to cultivate partnerships with suppliers with whom we may collaborate on strategically aligned areas, including research or educational outcomes. Suppliers of low-value and low-risk goods or services are engaged on an ongoing or ad hoc transactional relationship.

Table 1: Proportion of total spend by spend categories

Spend area	Proportion of total spend (%)
Property, Construction & Facilities Maintenance	23%
Labour & Professional Services	15%
IT Software	9%
Marketing & Events	7%
IT Services	7%
Library Services	6%
Lecturer and Teaching Expenses	6%
Undefined	6%
Student Services	5%
Corporate Services	5%
IT Hardware	4%
Energy & Utilities	3%
Laboratories and Research	2%
Property Management	2%
Office Related Supplies and Services	<1%

Table 2: Most common locations of international suppliers

Supplier country/region	Number of suppliers	Predominant spend areas
United States of America	148	Library materials, IT software, laboratory supplies, research and other expenses
United Kingdom	98	IT software, library materials, IT professional services, subscriptions and memberships, research equipment
Malaysia	52	Student recruitment (international), lecturer and teaching expenses, real estate
India	47	Student recruitment (international), professional services, travel expenses
China	46	Student recruitment (international), research equipment, research equipment parts and servicing, lecturer and teaching expenses
New Zealand	33	Research expenses, lecturer and teaching expenses
Indonesia	28	Student recruitment (international), travel expenses
Canada	27	Lecturer and teaching expenses, IT software, research equipment
Vietnam	24	Student recruitment (international), travel expenses
Singapore	22	Student recruitment (international), advertising and media, research expenses
Germany	21	Library materials, research equipment, research expenses, Student recruitment (international), IT software
Hong Kong	15	Student recruitment (international), events, research equipment parts and servicing, library materials

Understanding our modern slavery risks

Swinburne recognises and supports that freedom from slavery is a fundamental human right.

Swinburne relies on the Australian Modern Slavery Act's definition of modern slavery which includes eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour mean situations where children are subjected to slavery or similar practices or engaged in hazardous work.

We support the UN Guiding Principles on Business and Human Rights (UN Principles), which are the recognised global standard for preventing and addressing business-related human rights harm. We recognise our moral obligation to respect human rights and, as per the UN Principles, we will take action to prevent, mitigate and, where appropriate, remedy modern slavery across our operations, supply chains and in our investments.

Operational risks

Swinburne's total student headcount in 2024 was 45,258 across higher education and 22,787 across vocational education. At the end of 2024, Swinburne had more than 2,700 employees (2,383 full-time equivalent), comprising full-time, part-time and fixed term and casual staff.

Most Swinburne employees have terms and conditions of employment through one of the university's enterprise agreements. Staff are represented in the enterprise bargaining process by the National Tertiary Education Union (NTEU) and Australian Education Union (AEU) or can self-represent. Not all employees of the university choose to be a member of a union and membership is not compulsory. Australian-based employees who are not covered by an enterprise agreement are covered by modern awards. Swinburne supports freedom of association and employee representation and continues to have positive and regular interactions and communications with relevant Unions.

Swinburne is compliant with applicable labour laws and regulations. We do not impose any penalties or other negative consequences on employees wishing to cease their employment with the university. Employees leave their jobs without barriers or fear of consequences. On the rare occasions where we need to source labour from outside Australia (particularly to provide services within those geographies), we do so in a way that is compliant with the local labour laws and regulations and, to the extent appropriate, provide comparable terms and conditions to Swinburne's Australian employees.

We have policies and procedures in place to ensure a safe, equitable and supportive work and study environment for our staff and students. The university's People, Culture and Integrity Policy sets out the university's commitment to building a positive culture, promoting integrity, and supporting university members, community and industry partners. Ethical conduct is expected, encouraged, and supported with no tolerance for corrupt conduct, fraudulent activities, and maladministration. The policy requires that responsible persons must be free from a conflict of interest, bias and inappropriate influence when making decisions and dealing with other persons or organisations on behalf of the university. These policies are supported by the Complaints, Reviews, Appeals and Misconduct Framework for students and staff.

The university is committed to providing an environment for work and study that is safe, respectful, inclusive; free from bullying, violence, sexual harm, harassment and assault, discrimination, and harassment and vilification. The university is also committed to the safety of children and has zero tolerance for sexual harm and child abuse.

The university's position on improper conduct (including fraud and corruption, criminal offences, actions that lead to substantial risk to health and safety of a person) is guided by the principles of:

- upholding the highest standards of legal, ethical, and moral behaviour;
- ensuring the organisational culture and embedded risk controls effectively deter improper conduct;
- building willingness to report wrongdoing;
- ensuring compliance with public interest disclosure or whistle-blower legislation (including the *Public Interest Disclosure Act* and the *Corporations Act (2013,PID Act)*;
- protections for individuals who disclose improper conduct; and
- natural justice.

Swinburne researchers are committed to the highest ethical, professional, and scholarly standards. Our research adheres to the *Australian Code for the Responsible Conduct of Research (2018)*. We are committed to ensuring that all Swinburne research is conducted

responsibly with honesty, integrity and respect for human research participants, animals, and the environment. Research may be undertaken in partnership with a variety of Australian and international external parties that may include start-ups, small to medium enterprises, not-for-profit enterprises, multinationals, and government bodies. Due diligence is carried out on potential research partners to assess their ethical and sustainable business practices align with Swinburne's own integrity standards. Foreign interference legislation requirements are adhered to, supported by assessment and reporting processes, as applicable.

Swinburne has an independent disclosure service for employees and third parties to report suspected or actual illegal or improper activity. Information outlining how to access this service and the process for managing disclosures is found within Swinburne's Improper Conduct and Whistleblowing Guidelines. Disclosers may disclose anonymously if they wish.

Investment portfolio risk

Through investments in public and private companies, we can have an impact on the environment and communities worldwide. We believe we have an opportunity to influence those companies to create positive change. Our areas of focus within our Responsible Investment Charter are:

- climate change.
- human rights and modern slavery.
- sustainable development.

Swinburne requires our investment fund manager to undertake an annual review of Swinburne's portfolio performance against the Responsible Investment Charter and best practice. The 2024 review confirmed that Swinburne's investments comply with all commitments within the Investment Charter and the portfolio continues to perform well across all key ESG metrics monitored. The university rated A+ in Mercer's Responsible Investment Evaluation and ranks within the upper quartile of its global peer group, and well above the global university and education sector.

Importantly, the assessment confirmed that the portfolio has no exposure to companies with high severity red flag incidents in relation to modern slavery (aligned to UN Global Compact principles on forced labour and child labour). Swinburne's investment manager reports at least annually to the Swinburne Audit and Risk Committee, and Council, on regular assessments undertaken to confirm this position.

Supply chain risks

Swinburne conducts a yearly analysis on its procurement spend to assess the risks of modern slavery across our supply chain. The risk assessment for 2024 spend is based on outputs from the ArcBlue (part of Bain & Company) modern slavery tool. This tool determines risk exposure using different sources (e.g. 2023 Global Slavery Index, RESPECT Responsible and Ethical Private Sector Coalition Against Trafficking, NSW Anti-Slavery Commissioner Guidance on Reasonable Steps etc.) and produces a risk level assessment at a country, spend category (i.e. broadly aligned to industries), and supplier level.

Insights from the tool highlight that in 2024 Swinburne procured from 77 spend categories (975 suppliers) that contain an inherent high risk of modern slavery, influenced by factors such as complex global goods supply chains and low skill labour workforces (see **Graph 1**). The level of risk assigned to each category presents a view on the level of risk for that industry's supply chain, rather than the risk of the direct supplier alone.

Key categories of the university's spend that contain an inherent high risk of modern slavery are listed in **Table 3**.

Swinburne procures goods directly from overseas countries, albeit the proportion of these overseas suppliers is small relative to the number of total suppliers (21.2%). Of these, 138 suppliers located across the Asian, South American, and African regions are presenting with higher inherent risks of modern slavery, as shown in **Graph 2** and **Table 4** due to the higher rates of modern slavery and human trafficking prevalent in those regions.

As the university predominantly focuses on local procurement, Swinburne's spend with suppliers based in high-risk locations outside of Australia is mostly limited to student (international) recruitment services and educational support services (e.g. thesis examination and marking services).

The map (**Graph 2**) outlines Swinburne's suppliers in 2024 by country in relation to the prevalence of modern slavery risks as per the ArcBlue tool

Bringing together the two inherent risk assessments of Spend Category and Country into one overall risk score, Swinburne's modern slavery tool identifies 23 unique suppliers (1% of total suppliers) who are identified as being of a very high risk of modern slavey and 1,129 unique suppliers (31% of total suppliers) who are identified as being of a high risk of modern slavery (see **Graph 4**). Whilst these results are in line with educational organisations of our size, we continue to work with fellow universities, the AUPN and our suppliers to reduce our overall modern slavery risk.

The spend categories and countries identified as high risk are the subject of Swinburne's detailed analysis that is conducted during strategic procurement tenders and specific category reviews. Many of the spend areas require a deeper analysis of suppliers, taking into account their complex global supply chains, as opposed to purely focusing on the individual supplier that Swinburne transacts directly with. Strategic procurement projects delivered across Swinburne in 2024 considered and addressed inherent modern slavery risks for the relevant category and/or country.

While we continue to assess and address the overall modern slavery risk across our operations, investments and research activities, our supply chain remained our primary focus of action in 2024, given that this is the area where the potential risks of modern slavery occurrences are most prevalent.

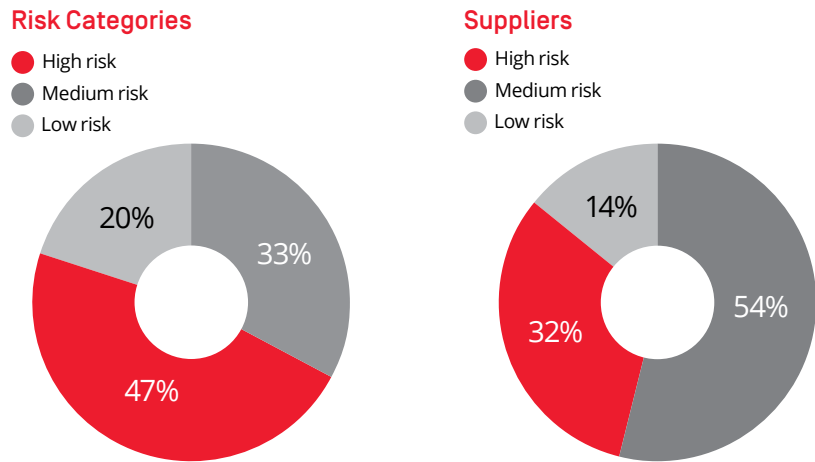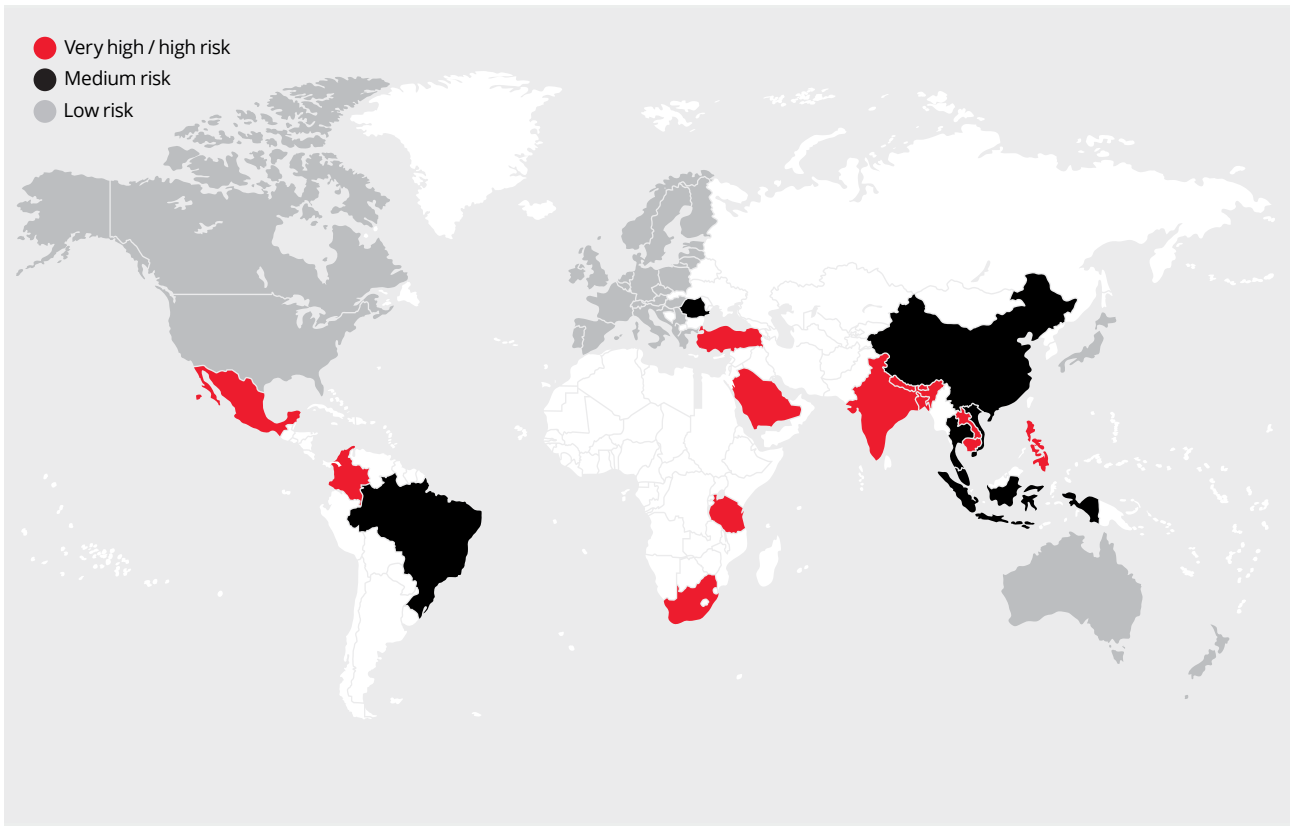## Graph 1: Spend category inherent risk level

Risk Categories
- 🔴 High risk
- ⬤ Medium risk
- ⬤ Low risk

Suppliers
- 🔴 High risk
- ⬤ Medium risk
- ⬤ Low risk

Table 3: Inherent high-risk spend areas

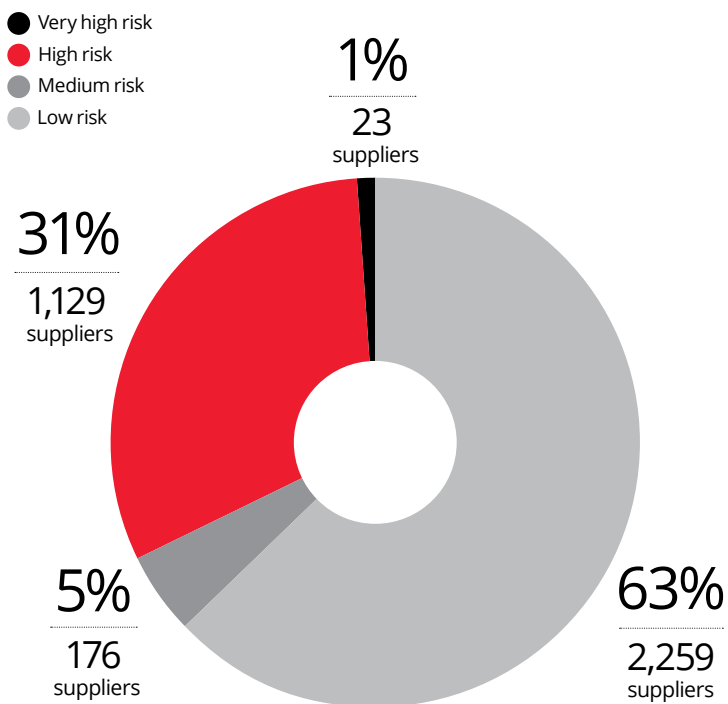| Goods	Services
• peripheral equipment • Equipment (scientific, engineering, telecommunications, AV, medical, electronics) • IT network infrastructure • Stationery and kitchen supplies • Laboratory supplies • Merchandise and apparel, including uniforms and PPE • Mobile devices and accessories	• Commercial cleaning and hygiene services • Security • Construction • Catering • Hotels and motels • International student recruitment • Software Licences

Table 4: Summary of suppliers from inherent high-risk countries

High-risk country	Number of suppliers
India	47
South Africa	6
Sri Lanka	5
Bangladesh	4
Cambodia	3
Philippines	3
Pakistan	2
Saudi Arabia	2
Laos	1
Turkiye	1
Timor-Leste	1

Graph 2: Geographical spread of suppliers and inherent risk levels

- 🔴 Very high / high risk
- ⚫ Medium risk
- ⚪ Low risk

Graph 4: Overall supplier risk level

- ⚫ Very high risk
- 🔴 High risk
- ⚫ Medium risk
- ⚪ Low risk

1%
23
suppliers

31%
1,129
suppliers

5%
176
suppliers

63%
2,259
suppliers

Our actions to assess and address risks of modern slavery

Swinburne recognises its responsibility to act to prevent, mitigate and, where appropriate, remedy modern slavery in our operations.

We also accept our obligation to work collaboratively with our direct and indirect suppliers to address the risks of occurrence of modern slavery across our supply chain. In 2024, we undertook several actions in this area and contributed significantly to the Australian Universities Procurement Network (AUPN) Anti-Slavery Program's sector response.

Raising the awareness and understanding of modern slavery

As an educational institution, Swinburne recognises the importance of raising awareness and educating our students and staff on the critical human rights issue of modern slavery.

Throughout 2024, we continued to deliver presentations to senior stakeholders, staff, and students on modern slavery. Furthermore, we included modern slavery as an ongoing content topic within the induction pack training materials distributed to new starters within the Procurement Team and the university as a whole. These sessions and materials provided information on the issue of modern slavery and its prevalence, the actions being undertaken by Swinburne, and, importantly, what actions individuals should take to assess and address related risks. In 2024, all members of the Procurement team received detailed modern slavery training, which elevated the capability of these practitioners to identify and acting on risks across Swinburne's supply chain.

Representatives across Procurement, Legal, Risk and Governance, Research and other operational teams have been engaged on this issue to mobilise cross-university collaboration through ad hoc forums and specific initiatives.

Swinburne's procurement framework

Swinburne's procurement framework is structured around a strong focus on sustainability and improving social outcomes, including reducing risks and occurrence of modern slavery in our supply chains. We take a holistic view of value for money in our strategic procurement of goods and services. This means that we base our purchasing decisions on a wide variety of criteria, including environmental and social factors, as well as more common criteria of quality, timeliness, and cost. We avoid setting unrealistic delivery timeframes and/or driving suppliers to offer unrealistically low prices, understanding the risks that this can present to labour exploitation (including modern slavery) and other negative impacts.

The framework consists of policies, procedures, guidance materials, templates, and tools that strive to deliver a balance of commercial and social value through any procurement that the university undertakes. In 2024, we continued to embed the framework in our working practices through university-wide communications, presentations, and training. The procurement framework contains due diligence measures in procurement processes to assess the risk of modern slavery across both new and ongoing supplier engagements. Regardless of any other considerations, any procurement determined to contain an inherent high risk of modern slavery is referred to the Procurement team. Project planning, evaluation and decision-making stages of strategic and tactical procurement projects include a focus on modern slavery. A modern slavery risk questionnaire is included in procurement (tendering) projects where the risk of modern slavery exists.

Swinburne's contract terms

As a key control mechanism, Swinburne's standard contract templates include clauses addressing modern slavery risk. These terms and conditions outline the supplier's obligation to investigate modern slavery in their own operations and supply chains, as well as assess and address risks, take meaningful actions including due diligence and remediation, and have necessary processes and systems in place. These terms also include an obligation for suppliers to include similar clauses in their own contracts with suppliers, supporting our intent to create positive impact across our entire supply chain. Modern slavery clauses are embedded in all our new supply arrangements and in existing supplier contracts as they are renewed.

Swinburne's supplier due diligence

To mitigate the risk of modern slavery in key service contracts, the procurement team undertakes the following activities:

- periodic issuing of questionnaires to selected suppliers requesting information to understand risks and actions taken;
- tender evaluation requiring suppliers to demonstrate policies, processes, and/or systems to reduce the risk of modern slavery and actions to mitigate or address modern slavery risks;
- periodic assessment of wages being paid at market/award rates, including auditing of employee payslips; and
- executing contracts with obligations specific to reducing labour exploitation and modern slavery.

In 2024, Swinburne used the ArcBlue supply chain transparency and modern slavery tool in its own procurement processes and when collaborating with the broader university sector on specific anti-modern slavery initiatives. The tool supports improved supply chain visibility, undertaking of due diligence actions and providing indicators to measure effectiveness. The results of due diligence during our own tender processes indicated a wide range of maturity in the modern slavery efforts within the suppliers assessed, and most responses required further information to better understand specific modern slavery risks.

To supplement the ArcBlue tool, Swinburne leveraged media monitoring alerts that related to suppliers, countries, and industries relevant to the university sector. These alerts were and remain critical to support capability uplift initiatives. During 2024, armed with the insights provided by these tools on where risks might be high across Swinburne's supply chain, the Procurement Team undertook deeper modern slavery reviews across specific spend categories.

Collaboration as a university sector

The Australian University Procurement Network (AUPN), the peak body for strategic procurement across the higher education sector in Australia and New Zealand, is taking an active approach to addressing this critical human rights issue.

Recognising the opportunity for universities to work together to leverage aggregated buying power and resources, a working group was established in August 2019 to drive a sector-wide approach. Renamed in 2023 as the AUPN's Anti-Slavery Program, the vision of the program is to support members to improve supply chain human rights transparency, reduce individual university costs and resources, collaborate on risks and issues for greater impact, and contribute to reporting requirements.

Swinburne's Director of Procurement, Sustainability and Property Services continued as Chair of this program in 2024, performing an important leadership role in driving outcomes. Working group members contributed their time and effort on a voluntary basis, with each AUPN member university contributing towards the program through a portion of membership fees. This funding goes towards program management, engagement of specialised subject matter expertise, and execution of specific initiatives Through this program, it is envisaged that both AUPN members and their suppliers will benefit from improved operational efficiencies and gain improved effectiveness in mitigating risk and improving social performance in supply chains.

The program delivered several key initiatives in 2024.

Academic Advisory Board

An Academic Advisory Board was established in July 2020 and refreshed in 2022 with ten academic members from seven universities with specific experience and expertise in modern slavery. With an aim to enrich the sector approach, academics were asked to provide insight and contribute expertise to help members understand risks and take action relative to the academic's area of expertise. Key insights were disseminated to universities through communications and guidance materials.

Risk tool and supplier engagement

ArcBlue's modern slavery tool was implemented at Swinburne (and across most other Australian universities) at the start of 2024. As outlined earlier, this solution determines risk from different sources and applies an inherent risk score at a country, spend category, and supplier level.

The aggregated data in the tool reflects the large breadth and scale of our combined supply chains across the sector and the crossover of suppliers being used by multiple universities.

Templates and guidance

Templates and guidance documents are made available to all AUPN members by the program, including a risk questionnaire, contract clauses, supplier code of conduct guidelines, guidance on effective grievance mechanisms and remediation, and modern slavery statement guidelines. These materials aim to provide member universities with information on grievance mechanisms, remediation, and a university's role in preventing and mitigating modern slavery within their supply chains. The materials go beyond procurement/supply chain considerations and offer overall guidance on grievance mechanisms and remediation universities' operations.

Capability uplift and engagement

One of the program's key objectives is to raise awareness, educate and stimulate action across the university sector, external stakeholders, and suppliers.

The monthly University Anti-Slavery Forum continued to build momentum during 2024, showcasing a suite of external speakers sharing insights and learnings on important topics related to modern slavery. Up to 85 procurement and other university staff attended each of the nine sessions throughout the year, representing 40 Australian and New Zealand universities. Speakers included representatives from Australian Red Cross, Property Council of Australia, Supply Chain Sustainability School and The Freedom Hub. Meetings also discussed progress on key initiatives, updates on action addressing key risks, and invited suggestions for collaboration. Minutes and key resources were disseminated across teams and made available through the AUPN portal.

The program engaged externally during 2024 to gather insights from other sectors and collaboration programs as well as raise awareness of the AUPN program. Groups engaged include Migrant Justice Institute, Anti-Slavery Australia, and ACRATH (Australian Catholic Religious Against the Trafficking of Humans).

Further information on the AUPN Program:

www.hes.edu.au/australasian-universities-procurement-network

Measuring our effectiveness

The influence and purpose retained by universities in society create an opportunity for Swinburne to take a leadership role, together with the wider university sector, in addressing Modern Slavery risks and actual instances.

Swinburne recognises that our approach to this critical issue will continue to evolve over time and that measuring our effectiveness is essential to prioritise our efforts for the periods ahead.

We will measure our effectiveness through:

- ongoing contribution into reviews of Swinburne's risk assessment framework and processes to ensure appropriate and up-to-date consideration of human rights abuses across our operations and supply chains;

- periodic reviews of the risk profile of Swinburne's existing supplier base with particular attention devoted to the progress made to reduce supplier risk profiles through action and review (for example, responses to questionnaires); and

- monitoring of progress against Swinburne modern slavery key performance indicators, including the number of:

Our Commitment	2024 Outcomes
All Swinburne staff and students are made aware of modern slavery issues through communications and training	Comprehensive Procurement framework continued to be embedded, including modern slavery information, education, processes, policies and risk monitoring within supplier relationships. Eighty key purchasers and procurers representing significant proportion of high risk spend completed refresher training on Swinburne's procurement framework and modern slavery risks. Revision of the communication and education process with modern slavery to be included in the new starter training and quarterly refresher courses available for key purchasers and procurers. Swinburne staff continued their involvement and education through AUPN meetings and training sessions.
Swinburne supplier engagement reviews that incorporate an assessment of modern slavery risks in the supplier's operations and supply chain	Tender documents and subsequent evaluations require suppliers to demonstrate policies, processes, and/or systems to reduce the risk of modern slavery and actual actions taken to comply with policies. In 2024, modern slavery reviews were undertaken for key high-risk tenders, including cleaning services, printing, merchandise, lighting and building refurbishments.
Swinburne supplier contracts that include modern slavery clauses	Swinburne's standard contract templates include clauses addressing modern slavery risk. The terms and conditions outline the supplier's obligation to investigate modern slavery in its operations and supply chains, assess and address risks, take meaningful actions including due diligence and remediation, and ensure necessary processes and systems are in place. They also include an obligation for suppliers to include similar clauses in their contracts with suppliers, supporting our intent to create positive impact through the end-to-end supply chain beyond our direct suppliers. These clauses continue to be embedded in all new supply arrangements and in existing supplier contracts as they are renewed.
High-risk suppliers engaged in response to risk alerts or undertaking proactive reviews.	Deep modern slavery assessments continued to be undertaken. In 2024, five assessments were undertaken in high-risk areas across categories including services and merchandise. These assessments including activities such as reviewing supplier information to understand risks and actions taken and auditing of employee payslips to assess market rate wages.
Year-on-year reduction in the proportion of suppliers indicated as being of a higher risk of modern slavery	The University continues to make progress in reducing suppliers at the level of very high and high risk of modern slavery.
Completion by suppliers of the ArcBlue modern slavery risk questionnaire	Supported ArcBlue to identify and work with 20 suppliers to undertake the risk questionnaire and related assessments

Priorities for the future

Swinburne recognises that continuous learning and improvement is an important component of any journey to eliminate modern slavery. Priorities for 2025 include:
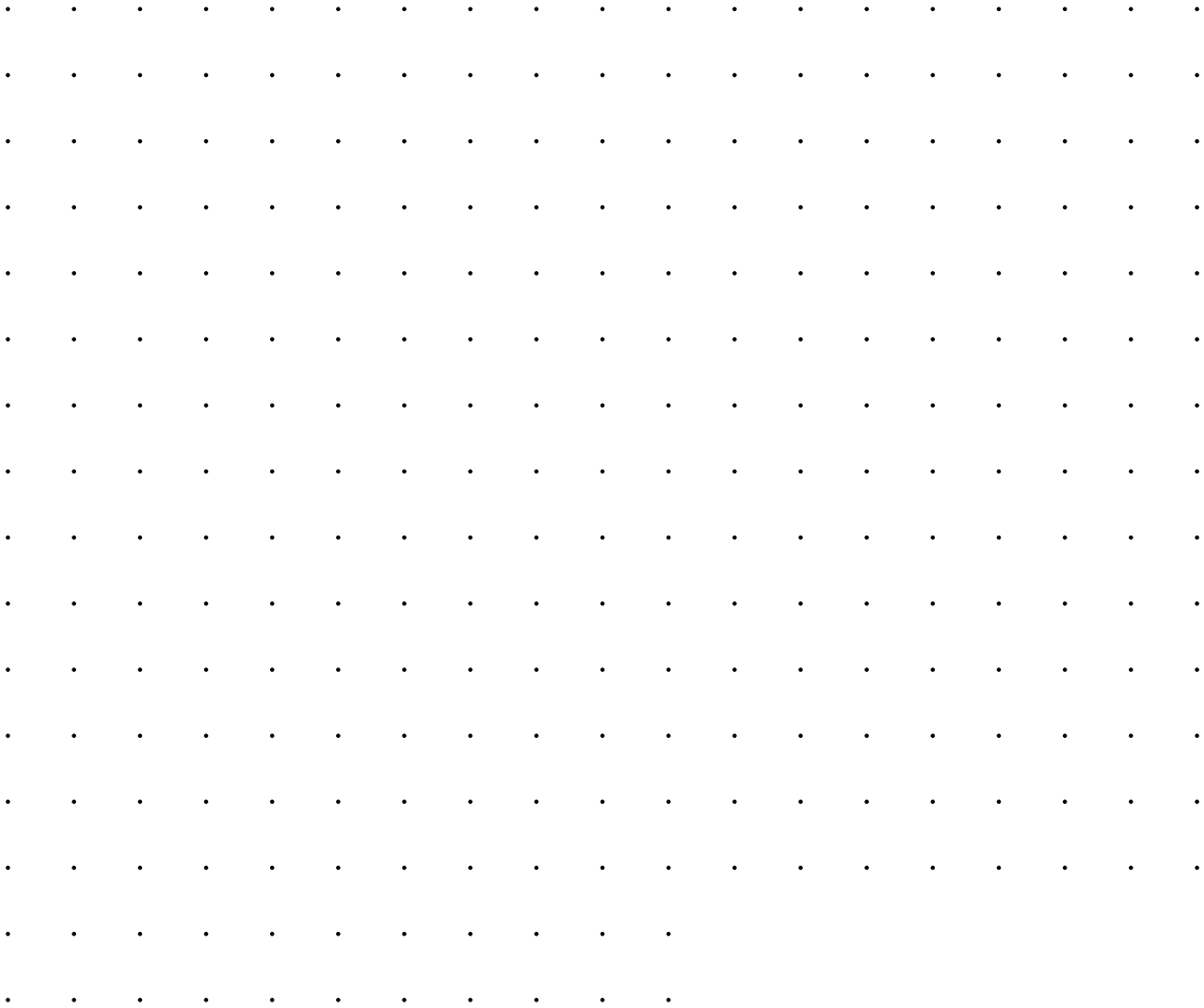
- further capability uplift across the Procurement and Sustainability teams to better identify modern slavery risk and assess supplier maturity (alongside other ESG priorities) in strategic procurement processes;

- Further use of analytics embedded in the ArcBlue modern slavery tool within Swinburne's procurement processes, utilising its insights during tenders and deep assessment of higher risk spend areas;
- engaging suppliers to secure participation in the rollout of modern slavery questionnaires across selected high risk spend areas;
- collaborating with the university sector to support key issues or risks that the AUPN Modern Slavery Program acts on;

- engaging with university Governance and Legal teams to review the appropriateness of Swinburne's complaints procedures and services to support modern slavery grievances; and
- delivering presentations, communications, and training sessions to raise awareness and uplift capabilities across the university around modern slavery.