



Modern Slavery Statement

2025



Contents

Introduction	02
About QUT	03
QUT structure	04
Operations	05
Supply chain	06
Risks of modern slavery practices	08
Actions taken and measuring effectiveness	12
Remediation actions in 2025	16
Australasian University Procurement Network (AUPN) Modern Slavery Program	18
Consultation	21
Approval	25



QUT acknowledges the Turrbal and Yugara, as the First Nations owners of the lands where QUT now stands. We pay respect to their Elders, lores, customs and creation spirits. We recognise that these lands have always been places of teaching, research and learning. QUT acknowledges the important role Aboriginal and Torres Strait Islander people play within the QUT community.



Introduction

Australia’s *Modern Slavery Act 2018 (Cth)*, which commenced on 1 January 2019, has strengthened transparency and accountability by requiring large entities to publish an annual statement describing how they assess and address modern slavery risks in their operations and supply chains.

Queensland University of Technology (QUT) (ABN 83 791 742 622) is committed to ethical, socially responsible and environmentally sustainable business practices. We recognise our responsibility to identify, prevent and address modern slavery risks across our operations and our supply chains—both direct and indirect.

This is the sixth *QUT Modern Slavery Statement* and covers the reporting period from 1 January 2025 to 31 December 2025.

In 2025, like many Australian universities, QUT continued to navigate a complex operating environment and competing priorities. While this influenced the timing of some planned program enhancements, we maintained strong core controls and continued to strengthen our approach in practical, risk-based ways. We remain committed to steady improvement and to embedding anti-slavery practices into the way we work.

This statement outlines the actions we have taken during 2025 and affirms our ongoing commitment to reducing the risk of modern slavery through continuous improvement, collaboration and transparency.

About QUT

QUT is the university for the real world, providing transformative education, student experiences and research relevant to our communities, guided by its values of ambition, integrity, inclusiveness, innovation and academic freedom.

Through bold research, inclusive education, lifelong learning and community engagement, QUT is shaping a future defined by purpose, progress and possibility.

Queensland is at a critical turning point with industries shifting, new sectors emerging and communities relying on educators to prepare learners for not just one but many careers.

As one of the youngest tertiary institutions in Australia, and among the top 200 universities globally for impact, QUT has built an agile ecosystem around its student community of more than 50,000.

We do this through the delivery of academic programs across our thriving faculties, QUT College, the Carumba Institute and research centres spanning business, creative industries, education, health, law, science and social justice.

While we continue to grow as a leader in technology and innovation our inner-city campuses at Gardens Point and Kelvin Grove are also evolving to ensure they remain vibrant, student-focused places of learning, research and connection for years to come.

QUT is deeply committed to embedding Indigenous Australian cultures, knowledges and perspectives across everything we do, and acknowledges the Turrbal and Yugara as the First Nations owners of the lands where QUT now stands. Through the Campus to Country: Positioning Strategy our campus buildings and learning spaces are grounded in a connection to Country that reflects this Indigenous Australian heritage.

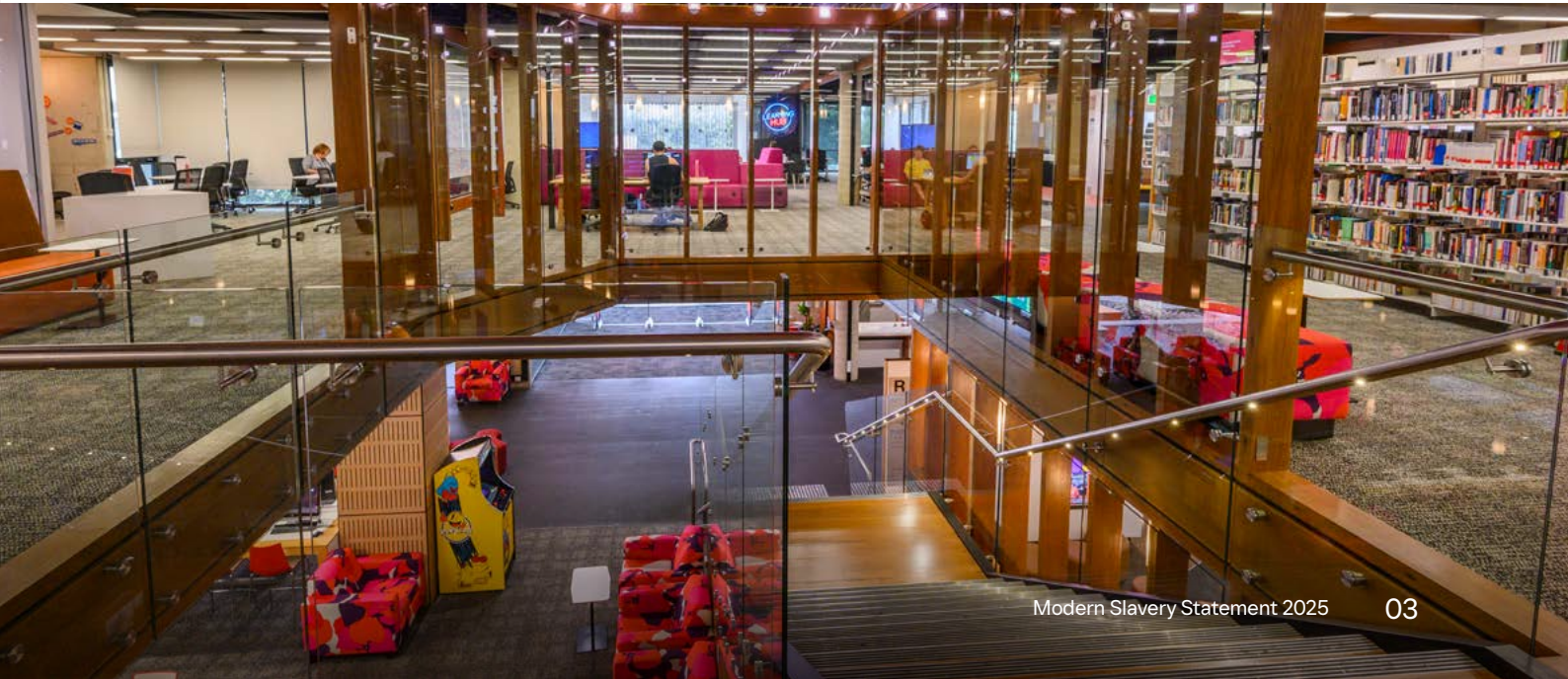
A complex higher education sector has continued to influence QUT operations in 2025, informed by regulatory change, fiscal constraints, global competition, workforce pressures and rapid technological advancement.

While these factors have limited enrolment growth to modest levels, they have firmly strengthened our focus on sustaining high performance across teaching, research and engagement.

As we look ahead, operational and capital plans are shaped by the need to balance short-term performance with ongoing investment in strategic priorities. As conditions evolve, QUT remains attentive to emerging risks and opportunities while delivering impact for our students, industry partners and the communities we serve.

QUT maintains its commitment to addressing modern slavery risks within our operations and supply chains.

More information about QUT business, history, operations and *Connections – the QUT Strategy 2023 to 2027* can be found in the *2025 QUT Annual Report* on our website at www.qut.edu.au/annual-report



QUT structure

The university’s governing body is the QUT Council, which oversees and reviews proper and effective management and operation of QUT and its controlled entities.



QUT Council is Chaired by the Chancellor, Ms Ann Sherry AO. Management of all operational and performance aspects of the university is the responsibility of the Vice-Chancellor and President, Professor Margaret Sheil AO.

The QUT structure is as follows:

- Academic Division
- Administrative Division
- Chancellery Division
- Faculty of Business and Law
- Faculty of Creative Industries, Education and Social Justice
- Faculty of Engineering
- Faculty of Health
- Faculty of Indigenous Knowledges and Culture
- Faculty of Science

The full university structure can be found on the QUT website at www.qut.edu.au/about/our-university/organisational-structure

- The university has eight controlled entities to support our operations. During the reporting period, five of these were operating as identified below:
- Brisbane Business School Pty Ltd (ABN 38 085 931 611)
 - QUT Student Managed Investment Fund (ABN 92 718 723 234) (operating)—please note this is defined as a fixed trust
 - QUT Enterprise Holdings Pty Ltd (ABN 97 097 319 778)
 - QUT Enterprise Holdings Trust (ABN 28 928 640 473) (operating)
 - qutbluebox Pty Ltd (ABN 34 118 773 096)
 - qutbluebox Trust (ABN 97 041 405 905) (operating)
 - QUT Advisory (ABN 82 099 110 924) (operating)—was previously Creative Industries Precinct (changed 2001)
 - Australian Battery Testing Centre Pty Ltd (ABN 95 671 332 237) (operating).

These controlled entities are considered as part of the QUT modern slavery risk assessment and consultation process, as described below.

Operations

The core operations of QUT are learning, teaching and research.

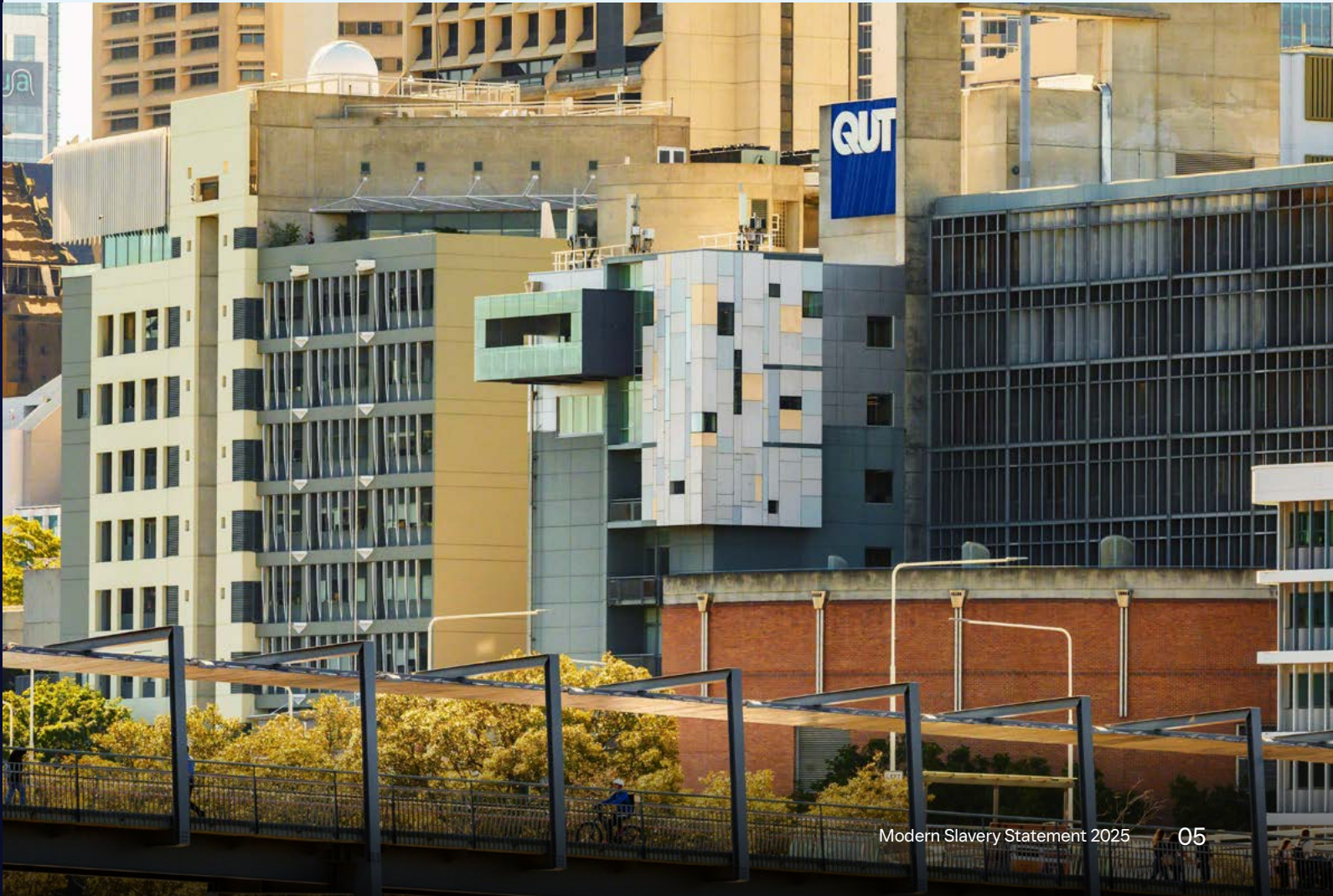
The university’s functions are to:

1. provide education at university standard
 2. provide facilities for, and encourage, study and research
 3. encourage the advancement and development of knowledge, and its application to government, industry, commerce and the community
 4. provide courses of study or instruction (at the level of achievement QUT Council considers appropriate) to meet community needs
 5. confer higher education awards
 6. disseminate knowledge and promote scholarship
 7. provide facilities and resources for the wellbeing of university students, staff and other persons undertaking QUT courses
 8. exploit commercially, for the benefit of QUT, a facility or resource of the university including, for example, study, research or knowledge, or the practical application of study, research or knowledge, belonging to the university, whether alone or with someone else
 9. perform other functions given to QUT under the QUT Act or another Act.
- QUT activities are largely undertaken across our two campuses at Gardens Point and Kelvin Grove and various distributed sites located in Queensland, Australia and one located in Canberra, Australia.

QUT does not own or operate overseas campuses. Some staff and students may travel overseas from time to time to undertake university-related work or study. The university’s controlled entities operate in Queensland, Australia.

As outlined in the annual report, in 2025 QUT had:

- 53,554 students (39,359 full time and 14,195 part time), including 971 Aboriginal and Torres Strait Islander students
- a total of 4,520 full-time equivalent (FTE) staff members
- \$1.4 billion in revenue.



Supply chain

QUT recognises that there are modern slavery risks across the goods, services and works that we purchase, and is committed to identifying and addressing these.

In 2025, QUT transacted with 17,673 unique suppliers. QUT spent \$344.3 million with external suppliers in 2025 across the following areas, inclusive of approximately \$30.0 million in corporate card spend.

Category	Includes, but is not limited to
Research, equipment and consumables	Equipment, scientific and medical consumables, chemicals, gases, and laboratory supplies.
Property and facilities	Construction, operations, maintenance, fleet, security, waste, cleaning, transportation services and minor works.
Technology	Computer hardware and accessories, software and licensing (including as a service), and audio visual and ICT services.
Business and teaching services	Professional services, human resources, library services, contingent labour, marketing, and media, legal, audit, logistics, freight, postage, financial services, banking, catering, uniforms, travel and insurance.
Non-procurement spend	Non-procurement/non-addressable spend (including QUT investments) and any spend that we are not able to currently categorise accurately.

QUT 2025 procurement spend

Total spend: \$344.3m
Note: includes \$4.9m non-procurement and \$4.7m undefined spend

Category spend

Property and facilities: \$72.5m
Technology: \$66.4m
Research equipment and consumables: \$56.8m
Business and teaching services: \$139.0m

Corporate card spend

Total corporate card spend: \$30.0m

Supplier spend

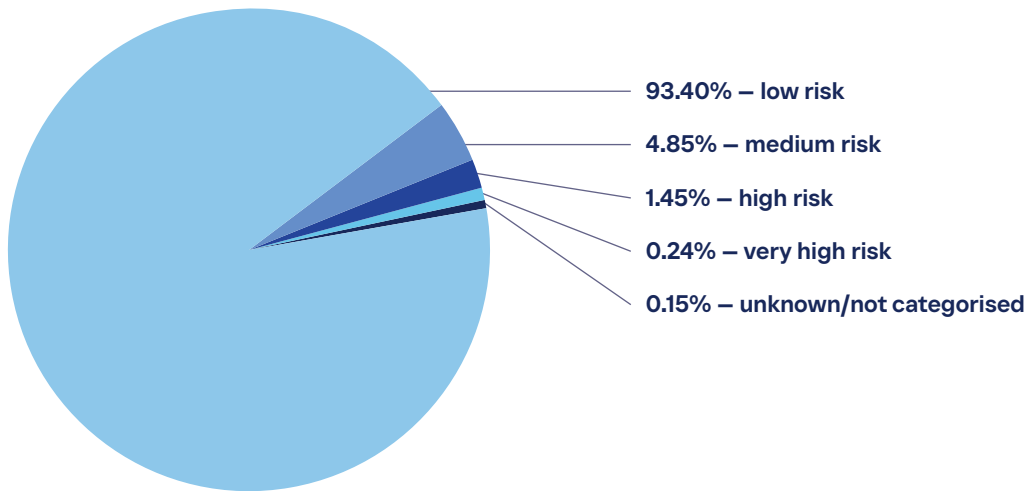
Total supplier count: 17,673

In 2025, our 100 top suppliers (by expenditure) accounted for 61 per cent of total expenditure, and our 700 top suppliers accounted for 90 per cent.

Top supplier count	1–100	101–300	301–700	Total (0–700)
Percentage of total spend	61%	19%	10%	90%
Spend value	\$213m	\$64m	\$34m	\$311m

Risk

In 2025, country risk ratings by supplier were as follows:



The very high-risk country engagements were with seven suppliers in Papua New Guinea and one supplier in Iraq. The payment made to the supplier in Iraq (\$409) was for a QUT external examination payment for an exam that was held in Duhok, Iraq.

The spend for \$150,863 in Papua New Guinea is, in part, for the Partnerships for Improving Education (PIE) program. This program is designed to improve access, equity and student learning outcomes in the early grades through a capacity development, systems-strengthening approach.

The PIE is a five-year investment in teaching and learning with a focus on improving the delivery of access to and quality of education for children in the early grades of primary school in Papua New Guinea (PNG).

The program began in July 2022 and is being implemented in close partnership with the PNG National Department of Education (NDoE).

Expenditure incurred outside of the PIE program is in relation to research work undertaken by teams that work closely with a range of agriculture industries in Australia, with smallholder farmers throughout the Pacific. This research is focused on improving the livelihoods of Indigenous peoples, especially women, and is instrumental in setting up new industries based on fruits and nuts from the rainforest.



Risks of modern slavery practices

In 2025, QUT continues to assess our overall risk of modern slavery as medium, consistent with other Australian universities and large, complex organisations.

While the majority of the university’s operations are based in Australia where the prevalence of modern slavery is generally lower, risks remain present within extended and global supply chains, including high-risk categories such as offshore manufacturing. QUT continues to take a proactive and risk based approach to identifying, assessing and mitigating these risks.

As the QUT approach to modern slavery continues to mature, the university recognises the need to broaden its risk lens beyond procurement and supply chains to more explicitly consider student related modern slavery risks, including risks associated with student recruitment pathways and student vulnerability. This includes progressing work to better understand how students may be exposed to modern slavery like practices and strengthening remediation pathways that focus on clear, accessible support mechanisms to help students seek assistance where concerns arise.

The QUT modern slavery program continues to operate through a distributed governance model, with oversight, risk mitigation and action delivery undertaken by staff contributing through the Anti-Slavery Reference Group and associated working groups as part of their substantive roles. Consistent with the findings of the QUT governance review, this approach is considered appropriate and proportionate to the university’s current risk profile, maturity and operating environment. The model has enabled meaningful progress in strengthening controls, building awareness and meeting reporting obligations, while fostering shared accountability across the university.

As QUT continues to mature its approach, opportunities to further enhance visibility, coordination and leadership engagement will continue to be considered through ongoing governance review and continuous improvement activities.

The Anti Slavery Reference Group continues to play a central role in monitoring and managing modern slavery risks across the university. The group meets quarterly, with members responsible for reviewing and monitoring risks within their respective functional areas, reporting on emerging issues and progressing mitigation actions or improvements relevant to their areas of accountability. This includes identifying gaps, escalating issues where required and contributing to continuous improvement in the university’s approach.

Modern slavery risk management at QUT is underpinned by its Enterprise Risk Management Framework, approved by QUT Council and overseen by the Risk and Audit Committee. This framework supports a systematic and proactive approach to managing risks across the university and continues to guide the assessment of modern slavery risks across QUT activities, including teaching, research, student related activities, investments, human resources, commercial operations, and procurement and supply chain arrangements.

Teaching and student services

In 2025, QUT had 43,511 domestic students and 10,043 international students enrolled. These numbers are slightly higher than 2024 student levels, reflecting the ongoing appeal

of QUT’s programs and student experience. University teaching and student support services continue to be delivered primarily in Australia by QUT-employed staff, in accordance with the university’s employment policies and procedures.

QUT recognises that students, particularly international students, may face increased vulnerability to modern slavery risks, including when engaging in work or volunteering in Australia, or participating in work integrated learning (WIL) and international learning experiences. To support and protect students, QUT provides education and awareness programs on their rights and ensures that student support services are easily accessible and well communicated.

All WIL arrangements require industry partners to sign an agreement that includes obligations to comply with relevant legislation and provide appropriate, varied tasks that support student learning outcomes. While additional modern slavery-specific clauses were previously considered for these agreements, it was determined that the nature of these learning activities and the existing contractual protections were sufficient to manage risk in this area.

In 2025, QUT had 2,330 higher degree by research (HDR) students enrolled. All HDR students receive at least the minimum QUT scholarship rate of \$33,637 (2025 rate) per annum. International HDR students without scholarships must provide evidence that they can support themselves financially for the duration of their stay in Australia, with a minimum funding level of \$29,710 per year,



in line with student visa requirements. In addition, QUT recommends limited working hours for HDR students while enrolled, and scholarship recipients must obtain approval from both their supervisor and Head of School before undertaking additional work.

Research

QUT undertakes diverse and impactful research activities, including collaborations and partnerships with local and international organisations. In doing so, we recognise the potential for modern slavery risks to arise, particularly in projects that:

- involve human participants based in countries with elevated risk profiles; and/or
- require the procurement of goods, services or equipment for research purposes, including the sourcing of human biospecimens from international biobanks.

All QUT researchers, including staff and students, are expected to uphold responsible research practices in accordance with the Australian Code for the Responsible Conduct of Research, as well as relevant ethics guidelines and legislative requirements. This commitment helps ensure that human participants of research are treated with care and respect, with appropriate consideration given to the needs of minority groups and vulnerable people.

Research involving human participants continues to undergo review by the University Human Research Ethics Committee (UHREC) or an authorised delegated review body, in accordance with the ethical principles outlined in the *National Statement on Ethical Conduct in Human Research* (2023). Although the 2023 National Statement applies for 2025, it will be superseded by the 2025 National Statement which came into effect in early 2026. This approach ensures alignment with national standards and provides safeguards against the exploitation of

participants in the conduct of research.

The QUT Office of Research Ethics and Integrity (OREI) plays a critical role in supporting researchers through training, guidance, processes and expert advice—embedding a strong research culture and enabling high standards of integrity and compliance.

As our research activity evolves, QUT is increasingly exploring innovative research supply models.

Management of human resources

All permanent, fixed term and casual staff engaged by QUT are recruited through transparent processes in accordance with approved policies and the QUT Enterprise Agreements. These agreements govern the employment terms and conditions for both academic and professional staff, ensuring fair and equitable treatment across the workforce.

In 2025, QUT entered into an enforceable undertaking with the Fair Work Ombudsman in relation to historical underpayments. These underpayments arose partly due to the inability of the time and attendance system to integrate into the payroll system and ensure automatic payment of staff entitlements. QUT self-identified these underpayments, and as part of the enforceable undertaking, is conducting a comprehensive external review of entitlements. During this review, QUT will be remedying any underpayment, including with interest and superannuation where applicable and implementing a new time and attendance system which will automatically pay staff entitlements and strengthen governance and oversight to ensure ongoing compliance with workplace laws.

To supplement its workforce and meet temporary operational needs, QUT also engages temporary staff through various mechanisms, including the Queensland Government Standing Offer Arrangement and the university's own Contract or Purchasing Terms and Conditions. These arrangements require

labour hire providers to hold a valid labour hire licence, in compliance with Queensland legislation designed to protect workers from exploitation and uphold the integrity of the labour hire industry. QUT has also included modern slavery clauses in contracts with labour hire and contingent workforce providers to strengthen supplier accountability and promote responsible employment practices.

Investments

As part of its operations, QUT makes financial investments and is committed to responsible investment practices. QUT has appointed the Queensland Investment Corporation (QIC) to oversee and manage the university's investment portfolio. QIC has its own published Modern Slavery Statement and is committed to embedding environmental, social and governance (ESG) factors into its investment decision making to support long-term, ethical and sustainable outcomes.

The QUT Finance and Planning Committee provides oversight of the university's investment strategy, including the selection of QIC investment options and monitoring of performance and associated risks. QIC is responsible for the selection and management of underlying fund managers and investment mandates. QUT does not directly appoint or manage individual fund managers. QUT relies on QIC's investment governance framework, including its approach to environmental, social and governance considerations and modern slavery risk management. As our approach matures, QUT will continue to monitor the practices of investment partners, including how they assess and address modern slavery risks within their operations and supply chains.

Commercial operations

In 2025, QUT maintained a number

of commercial licences, leases and agreements across its Gardens Point and Kelvin Grove campuses, as well as additional licences at external sites used for collaborative research and other activities. These arrangements include retail tenancies, telecommunications infrastructure, childcare facilities and collaborative research space, and are governed by legal agreements requiring compliance with applicable legislation.

Engagement with industry partners

QUT engages with a broad range of industry partners across its operations, consistent with *Connections—the QUT strategy 2023-2027*. These partners may be Australian or international entities, located in a variety of countries. Engagement of industry partners includes a due diligence process to ensure the partner is a legitimate business operation. Any concerns identified through this process are flagged with the accountable senior staff member for consideration and further action, if required.

Contracts and agreements within the Office of Industry Engagement (OIE) were reviewed internally and it was confirmed that modern slavery clauses were not required for the agreements and deed templates specifically used by the OIE, given the nature of these engagements.

Risk in controlled entities

QUT has a number of controlled entities (as listed above), including corporate trustees and trusts that primarily function as asset-holding or investment vehicles. These entities generally have limited independent operations, no direct employees and minimal direct supply chain activity. The modern slavery risks associated with controlled entities have been assessed as low, based on the nature and scale of activities undertaken during the reporting period.

Engagement with donors

While QUT aims to engage with donors who align with our values and ethical standards, there remains a risk that some donors may have operations or supply chains linked to modern slavery practices. To help mitigate this risk, due diligence procedures are undertaken for major donors and appropriate clauses are included in donation agreements where necessary.

Supply chain

Modern slavery risks within QUT supply chains arise primarily from labour-intensive service delivery models, subcontracting practices and the engagement of migrant or temporary workforces. Categories such as cleaning, security, catering, building maintenance, ICT hardware and apparel/uniforms are globally recognised as higher risk due to known issues relating to underpayment, excessive working hours, recruitment

fees and limited worker bargaining power.

Suppliers engaged by QUT are required to comply with QUT Purchase Order Terms and Conditions at the point of onboarding, acknowledging these requirements before any goods, services or works are supplied.

These terms and conditions include clauses requiring compliance with all relevant legislation, including obligations under modern slavery laws.

In addition to modern slavery requirements, the QUT Purchase Order Terms and Conditions also incorporate the *Queensland Procurement Policy (QPP) 2023 Ethical Supplier Mandate (ESM)*. Under this mandate, suppliers must uphold ethical business practices, including lawful employment conditions, appropriate payment of wages and avoiding any form of coercive or exploitative labour practices.

Compliance with the ESM is monitored by the Queensland Government's compliance branch, which may issue warnings or breaches to suppliers where unethical conduct is identified. QUT checks supplier status against this portal during onboarding and applies these requirements consistently across procurement activity to ensure suppliers meet expected ethical standards.

From 1 January 2026, the ESM was discontinued and replaced by the Procurement Assurance Model, which enforces compliance with the Supplier Code of Conduct in accordance with the *Queensland Procurement Policy 2026*. QUT will update its Purchase Order Terms and Conditions and supplier onboarding processes, with ongoing supplier due diligence checks, to reflect these policy changes and continue to uphold an ethical and responsible supply chain. There will be a strong focus on ensuring that there is no weakening of controls during the transition.

Actions taken and measuring effectiveness

In assessing the effectiveness of its actions in 2025, QUT focused on whether key controls were operating as intended, whether modern slavery risks were being identified earlier, and whether the capability and awareness of the university was improving in high-influence areas.

While recognising current resourcing constraints, QUT used a combination of governance oversight, targeted reviews, supplier engagement outcomes and monitoring activities to assess whether its approach remains appropriate and proportionate to its risk profile.

To support this assessment, QUT progressed a coordinated program of actions during the reporting period. These actions focused on strengthening supplier governance, embedding modern slavery considerations into procurement and policy frameworks, expanding education and awareness for staff and students, enhancing support mechanisms for students—particularly international students—and continuing sector collaboration through the Australasian University Procurement Network (AUPN).

Oversight of these activities was provided by the QUT Anti Slavery Reference Group, which operates through shared responsibility across functional areas in the absence of dedicated modern slavery resourcing.

In 2025, QUT undertook a formal review of the group's structure, purpose and terms of reference. This review informed a pilot operating model comprising of three sub working groups:

- Procurement and Supply Chain
- Education and Awareness
- Students and Research.

This model enabled improved engagement, clearer accountability and stronger action ownership. Building on this progress, QUT is progressing a refined governance structure to be implemented in 2026 to support continued program maturity.

In assessing effectiveness, the university's 2025 focus was on maintaining and reinforcing established controls, policies and practices to manage modern slavery risks, recognising current resourcing constraints. Ongoing monitoring and reporting through the Anti Slavery Reference Group provided assurance that risks were being actively reviewed and mitigated.

As QUT continues to mature its approach, work is underway to introduce more formal mechanisms to measure program effectiveness, enabling continuous improvement and stronger assurance over time.

These actions support core QUT objectives to proactively manage modern slavery risks, build staff capability, and empower students to understand their rights, access support and seek remediation where exploitation has occurred.

In 2025, QUT measured the effectiveness of its Anti Slavery Program against three core objectives. Progress was assessed through delivery of targeted actions, ongoing monitoring by the Anti Slavery Reference Group and status tracking against agreed measures, as summarised below.



Key measures	Summary of actions in 2025	Progress/status
Objective 1: Proactively understand and mitigate modern slavery risks across operations and supply chains		
Supplier engagement and compliance	Updated QUT procurement policy to embed responsible procurement pillars, including modern slavery.	Completed and ongoing
Risk alert reviews and action	Updated procurement documentation and responsible procurement tools to strengthen identification and mitigation of modern slavery risks.	
Partnerships and collaboration		
Incident reporting and remediation	Strengthened purchase order terms and conditions, including refined modern slavery clauses, ethical supplier mandate requirements and updated termination rights.	
	Aligned cleaning contracts with the BSCAA framework, including certification requirements.	
	Continued sector wide collaboration through AUPN and participation in the Electronics Watch pilot, including follow up on ICT supplier risk alerts.	
	Maintained incident tracking and remediation processes, with support provided where required.	
Objective 2: Empower staff with the knowledge skills and systems to identify, respond to and mitigate risks		
Training completion	Ensured 100% completion of modern slavery training for Anti Slavery Reference Group members and relevant procurement and finance staff.	Completed and ongoing
Awareness activities		
Integration into operational processes	Updated QUT general required (mandatory) training to include modern slavery resources accessible to all staff.	
	Released new ACRATH modern slavery training modules via the QUT LMS for all staff.	
	Delivered key awareness communications, including Anti-slavery Day messages and targeted reminders to senior leadership.	
	Maintained up to date intranet content with guidance, statements and reporting pathways.	
	Piloted a revised Anti Slavery Reference Group sub working structure to strengthen ownership and accountability.	

Key measures	Summary of actions in 2025	Progress/status
Objective 3: Empower and support students to understand their rights, report incidents and access services		
Student training and awareness	Issued agent 'newsbites' update to all QUT international recruitment agents reinforcing compliance obligations and linking to relevant resources.	Completed and ongoing
Targeted briefings for WIL and overseas study	Continued use of modern slavery clauses within Recruitment Services Agreements (RSAs) with annual compliance declarations from international agents.	
Reporting and support mechanisms	Received and reviewed QUT-specific insights from the Temporary Migrant Work Survey (2024), noting no direct actions required in 2025, pending further sector recommendations.	
	Reinforced contractual compliance with retailers through communications reminding them of wage and modern slavery obligations.	
	Ensured contract compliance mechanisms apply across QUT commercial operations and retail tenants.	

The QUT 2025 focus was on maintaining and strengthening established controls while piloting improved governance and delivery models. As the Anti Slavery Program continues to mature, QUT will further formalise performance measures to support deeper evaluation of effectiveness and continuous improvement.



Remediation actions in 2025

The published *QUT Remediation Plan* remained in place throughout 2025. No instances of modern slavery requiring remediation were identified during the reporting period.

The university's remediation framework is designed to respond not only to confirmed instances of modern slavery, but also to suspected exploitation or indicators of harm involving staff, students, suppliers or research activities. Reporting pathways are available through confidential internal channels, student support services and external referral mechanisms, with an emphasis on victim-centred responses, non-retaliation and access to appropriate support.

In November 2025, as part of the Australasian Universities Procurement Network (AUPN) program of work on modern slavery, and in response to emerging concerns regarding modern slavery risks within medical glove supply chains, the AUPN initiated a sector wide review of medical gloves. The review sought to strengthen collective due diligence across the sector and support a coordinated response to identified risks within the glove industry.

In January 2026, correspondence was received via the AUPN from a supplier relating to allegations raised in March 2025 concerning adverse human rights impacts associated with the supply of medical gloves. QUT had not engaged this supplier.

The AUPN continues to represent the sector in relation to this matter, providing updates on identified risks as well as the outcomes of the sector wide review. QUT will consider and implement any relevant actions arising from the review's findings and recommendations that are provided throughout 2026.



Australasian University Procurement Network (AUPN) Modern Slavery Program

The Australasian Universities Procurement Network (AUPN) Modern Slavery Program is a Higher Education sector-wide initiative involving 41 universities across Australia and New Zealand, including QUT.

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

2025 program pillars and initiatives

In 2025, the AUPN Modern Slavery Program operates under five program pillars.

1. Risk data

AUPN's Modern Slavery Program conducted sector-wide risk assessments to identify and prioritise supply chain categories with the highest potential impact. In 2025, member universities reviewed over 180,000 suppliers, representing a combined spend of \$14 billion, to map and monitor modern slavery risks across procurement activities. This data-driven approach enables targeted interventions and helps ensure compliance with the Modern Slavery Act 2018 (Cth) and related regulations. Focus areas include medical equipment, ICT and international student recruitment.

2. Capability uplift

The program invests in ongoing professional development and knowledge sharing to strengthen sector-wide capability in addressing modern slavery. In 2025, nine dedicated forums brought together expert speakers, survivor advocates and procurement professionals to discuss topics such as ethical apparel procurement and risk identification tools. Regular newsletters, university case studies and monthly updates facilitate continuous learning and improvement. The sector also benefits from national rollout of ACRATH's Educating for Change micro-credentials, developed in partnership with Flinders University and the University of South Australia. These six online modules, free for staff and students, cover an introduction to modern slavery, university-specific risks and practical sector guidance. As of the end of the 2025, they have been implemented by 32 universities in Australia.

3. Supplier engagement

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

Further to this, AUPN began a detailed review into modern slavery risks in the medical gloves sector. This process builds on a review conducted in 2021 and will be finalised in 2026.

In the ICT category, 22 universities participated in an Electronics Watch pilot, monitoring 27 factories across seven countries. Common risks identified included illegal wages, health and safety, discrimination, excessive hours and forced labour. Remediation is underway in 13 cases, with two instances requiring direct university engagement to resolve outstanding issues.

4. Industry collaboration

The Modern Slavery Program is built on sector-wide collaboration. Through initiatives like the National Temporary Migrant Work Survey which captured international student experiences, and the International Student Risk Roundtable, 2025 saw universities come together to share ideas and information with the goal of developing best practice guidance and responses.

In 2025, 18 universities contributed over 150 student responses to the National Temporary Migrant Work Survey, building an evidence base for future action. Key outcomes include a new project focused on the development of sector-wide guidance, due to be completed in 2026, increased recognition of university responsibility and identification of barriers.

In 2025, the International Student Risk Roundtable brought together stakeholders from 11 universities with experts to address the risks which face students across their journey, from recruitment outside of Australia to their experiences on our campuses.

5. Third party support

External partnerships and third-party expertise underpin the program's efforts. The rollout of ACRATH's Educating for Change micro-credentials exemplifies effective collaboration with advocacy and training organisations. The sector also benefits from partnerships with global organisations such as Electronics Watch, which provides independent monitoring and remediation support in electronics supply chains. These collaborations ensure universities have access to credible resources, up-to-date training and specialist support, enhancing their ability to prevent and address modern slavery risks.

The AUPN Modern Slavery Program has established a robust foundation for collective action, continuous improvement and sector-wide capability uplift. Future priorities include expanding risk assessments, deepening supplier engagement, the development of guidance covering student protections and exploring stronger analytics capabilities through third party systems.

For more information, please visit hes.edu.au/university-anti-slavery-program





Consultation

In addition to consultation with the AUPN as outlined above, QUT continued its Anti-Slavery Reference Group.

Consultation and engagement with the representatives of this group is a critical part of our response. The group met four times throughout 2025, with the sub working groups meeting an additional two times.

The Anti Slavery Reference Group provides a formal mechanism for cross university consultation and coordination on modern slavery matters. It brings together representatives from key operational, academic and professional areas, including those responsible for managing supply chain and student related and institutional risks. In 2025, the Reference Group comprised representatives from a broad range of functional areas across the university. This approach to membership is intended to remain broad, representative and multidisciplinary in 2026 and beyond to ensure effective oversight, shared accountability and informed decision making.

2025 representation

- Finance Business Solutions
- QUT International
- Digital Business Solutions
- Business Development
- Research
- Work Integrated Learning
- Student Services and Equity
- Graduate Research Centre (GRC)
- Assurance and Audit
- Faculty Operations
- Teaching (through a Head of School)
- Graduate Research Centre
- Human Resources
- Commercial Operations
- Engagement

Other information and next steps

The actions and focus areas identified for 2026 and beyond align with the three core QUT objectives and reflect the reality that effectively addressing modern slavery risks is a long term endeavour. Meaningful and sustainable progress requires ongoing effort, time and capability building, particularly within large, complex institutions and extended supply chains.

Looking ahead, the university's multi-year focus will be on further maturing its response by embedding good practice, strengthening internal capability, enhancing supplier engagement and maintaining visibility over higher risk categories. This includes expanding modern slavery risk considerations beyond supply chains to more explicitly encompass risks relating to students, staff and research activities.

As in previous years, delivery of the action plan will continue to be monitored and guided by the QUT Anti Slavery Reference Group. The group remains focused on ensuring actions are practical, proportionate and aligned with the university's broader ethical sourcing and responsible business objectives.

Action item	Actions by objective for 2026 and beyond (noting that these will take time to implement)
Objective: Procurement and supply chain	
1	Design and implement risk based due diligence and screening tools for higher risk suppliers, including international student recruiters and agents, as part of onboarding, contract renewal and ongoing contract management processes.
2	Using AUPN endorsed tools and templates, undertake Supplier Assessment Questionnaires (SAQs) with at least one strategic supplier in each major spend category and review responses to identify improvement opportunities and remediation actions where required.
3	Update procurement and contract management training to ensure modern slavery risks are addressed and delivered to identified high risk or high influence groups (e.g. digital, property and facilities, research and capital works stakeholders).
4	Review upcoming sourcing activities to embed stronger ethical supplier outcomes aligned with the Queensland Procurement Policy 2026 – Purposeful Public Procurement outcomes, including refreshed modern slavery clauses, evaluation criteria and contract management requirements.
5	Continue active participation in AUPN initiatives and pilot programs (e.g. Electronics Watch, medical gloves), including reviewing outcomes, responding to risk alerts and incorporating learnings into QUT procurement practices.
Objective: Education and awareness	
1	Develop and implement a coordinated modern slavery communications plan for 2026 to drive awareness, behavioural change and leadership visibility across staff, students and suppliers.
2	Review available external training (e.g. ACRATH and sector alternatives) and refresh the suite of QUT modern slavery tools, templates and guidance to ensure consistency, relevance and ease of access.
3	Create an external facing modern slavery webpage for QUT that houses the Modern Slavery Statement, supplier expectations, training resources, tools and guidance, serving as a central reference for both internal and external stakeholders.
4	Implement a central tracking mechanism for all modern slavery related education and training delivered to staff and students, with regular review of participation and completion rates to inform future targeting.
5	Introduce targeted awareness sessions or briefings for senior leaders and decision makers to strengthen sponsorship, accountability and organisational influence for modern slavery initiatives.

Action item	Actions by objective for 2026 and beyond (noting that these will take time to implement)
Objective: Students, research and staff	
1	Expand the QUT modern slavery remediation framework to explicitly cover student, staff and research related risks, including clear escalation pathways, support services and referral mechanisms.
2	Develop and implement an action plan in response to the 2024 International Student Survey Campaign (Migrants and International Students), addressing identified vulnerabilities and sector recommendations as they emerge.
3	Identify and deliver tailored modern slavery education to higher risk cohorts, including international students, WIL participants, researchers working offshore and staff involved in recruitment, placement or fieldwork activities.
4	Review the integration of modern slavery considerations into research governance, ethics and risk assessment processes where human participants, overseas partners or vulnerable populations are involved, and assess what could be strengthened.
5	Establish mechanisms to capture feedback from students and staff on awareness, reporting pathways and support services to inform continuous improvement of prevention and remediation approaches.





Approval

This sixth *Modern Slavery Statement* provided by QUT is pursuant to Section 13 of the *Modern Slavery Act 2018 (Cth)* and has been approved by the Council of Queensland University of Technology.

Professor Margaret Sheil AO
Vice-Chancellor and President
QUT

Sources of data:

- QUT Annual Report
- QUT website
- QUT Anti-Slavery Reference Group – working groups and actions
- QUT Anti-Slavery Reference Group – Action Plan
- QUT Anti-Slavery Effectiveness Measures
- QUT spend data provided February 2025 for Australian University Procurement Networking Benchmarking Data
- AUPN Anti-Slavery Dashboard
- QUT Spend Analytics Platform – Sievo for 2025 spend data
- QUT Anti-Slavery Remediation Plan
- AUPN – University Anti-Slavery Program Overview 2025

