



**MODERN
SLAVERY ACT
REPORT
2025**

MONASH UNIVERSITY recognises that its Australian campuses are located on the unceded lands of the people of the Kulin Nations, and pays its respects to their Elders, past and present. Monash is committed to fostering a society that recognises, respects and includes Indigenous peoples, cultures and knowledge.

The University contributes to the creation of this society by working with and celebrating Aboriginal and/or Torres Strait Islander peoples, cultures and knowledge, as well as Indigenous peoples of other places where Monash has a campus or major presence.

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FOREWORD BY THE VICE-CHANCELLOR AND PRESIDENT, MONASH UNIVERSITY




The 2025 Modern Slavery Act Report is Monash's sixth such report detailing our continuing work to identify the risks of modern slavery in our operations, investments and supply chains. It details the actions we have taken to address those risks as part of our commitment to enhancing transparency and reduce modern slavery.

This work is supported by a refreshed [Environmental, Social and Governance \(ESG\) Statement](#) that was developed in 2025, and our five-year program of activity.

In 2025 our work included a special focus on the University's sourcing arrangements for apparel. It included a capability uplift program among our suppliers to better identify and help address any shortcomings. We also continued to expand the use of technology to enhance our work, with new data analysis identifying a series of potential new risk indicators to guide our prevention work.

Monash has an unwavering commitment to human rights and responsible business practices, bolstered by our support for the United Nations' 17 Sustainable Development Goals, including the ending of modern slavery, all of which are embedded in the University's [Impact 2030](#) strategy. The framework and strategy shape our decisions and inform our daily operational practices.

As an institution, Monash was founded to realise social and technological transformation to meet the challenges of the age for the aspiring communities around us. These communities and our responsibilities extend to all of our operations, investments, and supply chains wherever they may be.



Professor Sharon Pickering

Vice-Chancellor and President

ABOUT THIS REPORT

Modern slavery is a pervasive problem that requires robust solutions based on collective action to generate change in global practice. Modern slavery refers to situations where threats, coercion and deception are used to undermine one's freedom and to inflict exploitation. These practices can include human trafficking, slavery, debt bondage, forced labour, the worst forms of child labour, domestic servitude, and forced marriage.

This is Monash University's sixth report under the *Modern Slavery Act 2018 (Cth)* (the Modern Slavery Act).

This report was approved by Monash University Council in its capacity as principal governing body of Monash University, on the 13 May 2026. Vice-Chancellor and President, Professor Sharon Pickering, is the responsible member.

MODERN SLAVERY AROUND THE WORLD

There are 27.6 million people in situations of forced labour on any given day. This translates to 3.5 people in forced labour for every thousand people in the world. Of the total population in forced labour, 11.8 million are women and girls. More than 3.3 million of all those in forced labour are children, which includes girls also counted in the women and girls subset. Forced labour exploitation generates an estimated USD 236 billion of illegal profits annually.¹

MODERN SLAVERY WITHIN AUSTRALIA – THE AUSTRALIAN FEDERAL POLICE

Over the 2024–2025 financial year, modern slavery reports made to the Australian Federal Police within Australia included a 150 per cent increase in Exit Trafficking where a person is forced, coerced, threatened or deceived into leaving Australia². Overall reports of human trafficking increase by 10 per cent each year.

The number of reported cases of forced marriage, sexual servitude, child trafficking, and slavery increased compared to the previous year, while reports of forced labour, trafficking in persons, debt bondage, and deceptive recruiting declined. Although the reduction in some categories is encouraging, the fact that there is still, on average, one report per day across different forms of exploitation remains deeply concerning.

This hidden, large-scale exploitation is becoming more common in global and local communities, often harming those least able to defend themselves and those least protected by policy and law.

This report demonstrates how Monash is working to identify the risks of modern slavery in our operations, investments and supply chain, and the actions we have taken to address those risks. These actions are part of our five-year continuous improvement program to systematically reduce modern slavery within our operations, investments and supply chain.

¹ International Labour Organisation – *Data and Research on Forced Labour*, Accessed 16 February 2026.

² Australian Federal Police – *Reports of human trafficking nearly double over past five years*, Accessed 12 February 2026.



OUR COMMITMENT

We are committed to actively contributing to a future without modern slavery.

Monash University supports human rights within its operations, investments and supply chain, in full compliance with the *Modern Slavery Act 2018 (Cth)*. This is supported by a refreshed [Environmental, Social and Governance \(ESG\) Statement](#), our commitment to human rights extending ethical practices across our operations and procurement, and a program of reduction of modern slavery. These commitments are also further highlighted as part of Monash University's annual ESG reporting program.

Our program for the reduction of modern slavery has significant leadership support, including from the Vice-Chancellor's Group, and the Monash University Council (including the ESG and Estates Committee of Council).

As a global leader in research and education, Monash University welcomes feedback and questions, or the opportunity to provide additional information concerning this report or modern slavery. Please contact antislavery@monash.edu.

This report outlines the actions taken by Monash University in relation to identifying and mitigating modern slavery risks within its operations, investments and supply chain. In this report, we refer to 'modern slavery' as defined by the Act.

We have identified numerous areas of concern with the assistance of our affiliates. Affiliates are third party external service providers or advisors to the University that focus on human rights, and are able to explore our supply chain in more depth and identify any known issues. We continue to work with affiliates and their global networks to identify, clarify, address, remediate and monitor areas of concern in our supply chain. Our affiliates focus on worker rights and their ability to identify and engage with work sites in our global supply chain enabling key parts of our program.

Monash's commitment to reduce modern slavery is, fundamentally, preventing any risk of harm to people, and the protection of human life and freedom. Monash aims to deliver meaningful outcomes that improve the lives of people affected by modern slavery, which informs the goals of Monash's program to prevent modern slavery from its operations, investments, and supply chains.

THE MONASH UNIVERSITY FIVE-YEAR MODERN SLAVERY PROGRAM

Our five-year rolling modern slavery program continues to evolve. Our flexible approach includes cross-year themes and allows for adjustment to the program as new issues and opportunities are identified and prioritised. In addition to cross-year themes, there are specific tasks for each year. Each task will determine the next steps such as a deep dive, assessment of effectiveness, review of previous work to test effectiveness and identify improvements, and any plans or adjustments

2025	2026	2027	2028	2029
Offshore research and education.	Review of effectiveness of electronics solution (Electronics Watch).	Review of risks in procurement practices.	Review of security services.	Review of offshore entities modern slavery tools and effectiveness.
Spot check of modern slavery clauses – offshore.	Review of effectiveness of apparel panel.	Review of human rights protections embedded in key policies, procedures and contracts.	Modern Slavery website review.	Review of grievance approach.
Program review and forward planning.	Provide offshore entities with tools to standardise the monitoring of modern slavery requirements.	Review of cleaning services.	Scoring methodology for investment reports from our investment managers.	Review of remediation framework.
Remediation framework completion.	Integrated modern slavery grievance approach.	Review of apparel risk mitigations.		

Where a review identifies an opportunity for improvement, it will be implemented immediately, or included as actions in the program plan.

CROSS-YEAR TASKS



- ASSESS ADDITIONAL ENTITIES FOR ONBOARDING
- RISK IDENTIFICATION
- SUPPLIER SCREENING
- SUPPLIER MONITORING
- RISK MITIGATIONS
- TRAINING
- REMEDIATIONS
- POLICIES AND PROCEDURES
- CONTINUOUS IMPROVEMENT
- EFFECTIVENESS MONITORING
- AUDIT AND COMPLIANCE
- REPORTING (ESG, MODERN SLAVERY ACT REPORT)



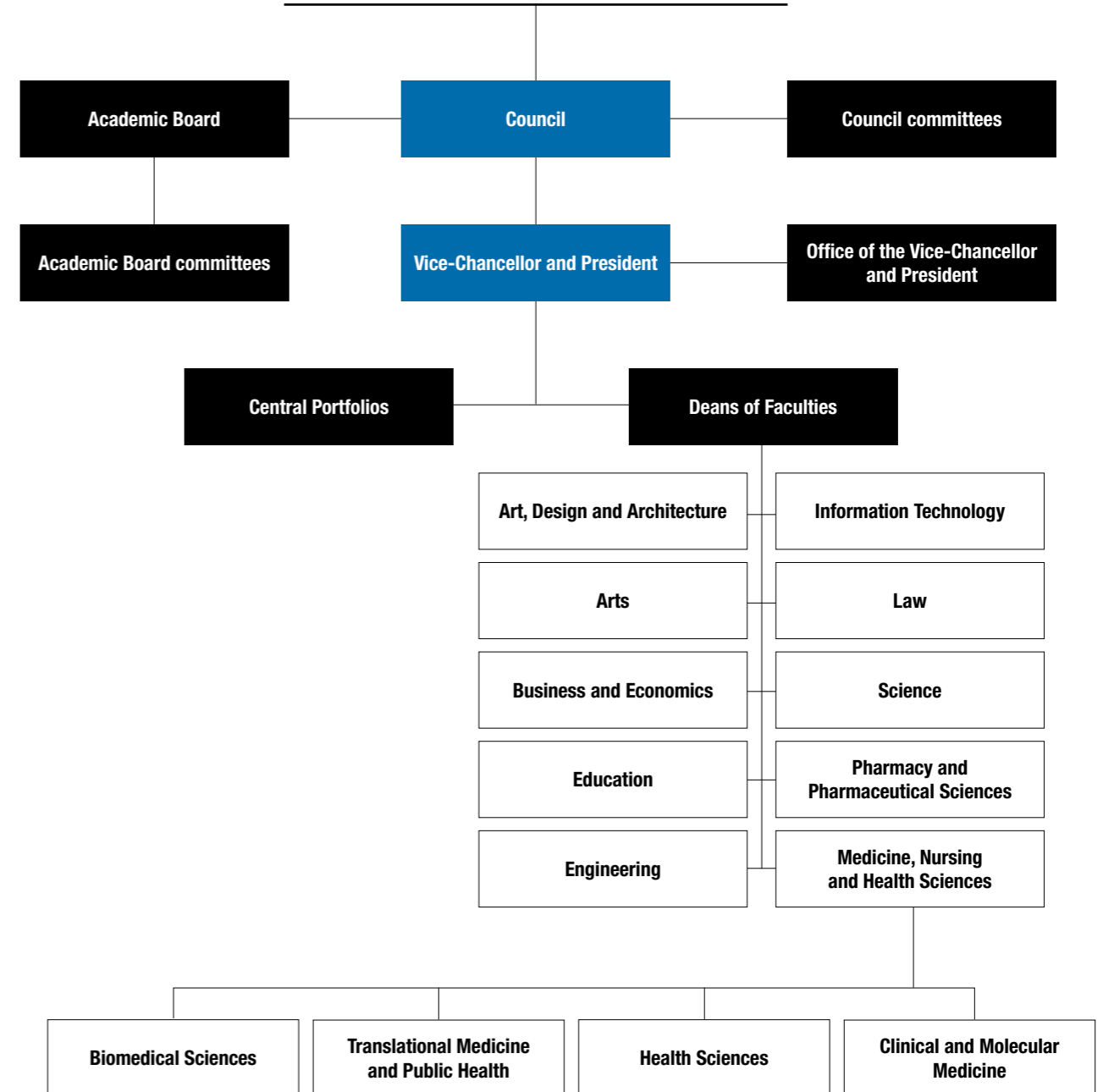
THE REPORTING ENTITY AND THE UNIVERSITY'S STRUCTURE

REPORTING ENTITY

Monash University is constituted under the *Monash University Act 2009* (Vic), which is supplemented by a framework of regulatory instruments, namely the Monash University statute and a suite of regulations, as well as a range of policies and procedures. Monash University is regulated by the *Higher Education Support Act 2003* (Cth) and the *Tertiary Education Quality and Standards Agency Act 2011* (Cth), under which the University has accreditation as an Australian higher education provider.

The principal governing body of the University is the Monash University Council, chaired by the Chancellor, Dr Megan Clark AC.

The *Monash University Act 2009*



Members of Council

The following persons were members of the Council and Council committees during 2025.

EX OFFICIO MEMBERS

Dr Megan Clark AC Chancellor

BSc(Hons) PhD FATSE FAICD FAusIMM
Current term as Chancellor: 02/07/2024 – 01/07/2029
First appointed to Council: 01/04/2015
> Executive Committee, Chair
> Honorary Degrees Committee, Chair
> Membership Committee, Chair
> Selection and Remuneration Committee, Chair
> ESG and Estates Committee, member
> Resources and Finance Committee, member

Professor Sharon Pickering Vice-Chancellor and President

BA MA PhD FASSA
Appointed Vice-Chancellor: 29/01/2024
> ESG and Estates Committee, member
> Executive Committee, member
> Honorary Degrees Committee, member
> Membership Committee, member
> Resources and Finance Committee, member
> Selection and Remuneration Committee, member

Professor Carla Wilkin Academic Board President

BCom(Hons) PhD FCPA CA SFHEA MACS (Snr)
Current term: 01/01/2024 – 31/12/2025
First appointed: 01/01/2024
> Honorary Degrees Committee, member



APPOINTED MEMBERS

MEMBERS APPOINTED BY THE GOVERNOR IN COUNCIL

Geraldine Johns-Putra Deputy Chancellor

BEC LLB(Hons) LLM
Current term: 01/07/2025 – 30/06/2028
First appointed: 01/07/2019
> ESG and Estates Committee, Chair
> Membership Committee, member
> Selection and Remuneration Committee, member

Ms Julie Ligeti

BA/LLB GAICD
Current term: 15/10/2025 – 14/10/2028
Re-appointed: 15/10/2025
First appointed: 01/01/2018 – 20/06/2022

Dr Jane McAloon AM (until 31 December 2025)

LLB BEc (Hons) Grad Dip Corp Gov FAICD
Term: 01/09/2024 – 31/12/2025
First appointed: 01/09/2024
> Audit and Risk Committee, member

Ms Jennifer Samms

BEC
Current term: 01/07/2023 – 30/06/2026
Re-appointed: 01/01/2020
First appointed: 01/09/2002 – 31/12/2006
> ESG and Estates Committee, member
> Honorary Degrees Committee, member

MEMBER APPOINTED BY THE MINISTER

Dr Gillian Sparkes AM

B App Sc Grad Dip App Sc PhD MBA FAICD FIPAA
Current term: 01/01/2024 – 30/06/2026
First appointed: 01/01/2024
> ESG and Estates Committee, member
> Resources and Finance Committee, member

MEMBERS APPOINTED BY THE COUNCIL

Mr Peter Marriott Deputy Chancellor¹

BEC(Hons) FCA MAICD
Current term: 01/01/2025 – 31/12/2027
First appointed: 01/01/2019
> Resources and Finance Committee, Chair
> Executive Committee, member
> Membership Committee, member
> Selection and Remuneration Committee, member

¹ Mr Marriott was appointed Deputy Chancellor from 13 August 2025

Mrs Pitsa Binnion PSM

BA Dip Ed MACE
Current term: 01/01/2024 - 31/12/2026
First appointed: 01/01/2021
> Audit and Risk Committee, member
> ESG and Estates Committee, member

Professor Gill Callister PSM (until 31 December 2025)

BSW(Hons) BA
Term: 01/01/2023 - 31/12/2025
First appointed: 01/01/2020
Honorary Degrees Committee, member
Resources and Finance Committee, member

Mr John Simpson AM Deputy Chancellor (until 31 July 2025)

BA FCSG MAICD
Term: 01/01/2024 – 31/07/2025
First appointed: 21/10/2014
> Audit and Risk Committee, member
> Resources and Finance Committee, member
> Selection and Remuneration Committee, member

Mr Steven Skala AO

BA LLB(Hons) BCL
Current term: 01/08/2025 – 31/07/2028
First appointed: 01/08/2025
> Resources and Finance Committee, member

The Hon Peter Young AM KC Deputy Chancellor (until 31 December 2025)

BJuris LLB
Term: 01/01/2023 – 31/12/2025
First appointed: 01/01/2014
> Audit and Risk Committee, Chair
> Executive Committee, member
> Honorary Degrees Committee, member
> Membership Committee, member
> Selection and Remuneration Committee, member

STAFF-ELECTED MEMBER

Professor Wayne Hodgson

BSc Grad Cert High Ed PhD
Current term: 01/11/2024 – 31/10/2026
First appointed: 01/11/2024
> Audit and Risk Committee, member
> Resources and Finance Committee, member

STUDENT-ELECTED MEMBER

Mr Demitrios Kaminis

Current term: 01/11/2024 – 31/10/2026
First appointed: 01/11/2024
> ESG and Estates Committee, member

UNIVERSITY SECRETARY

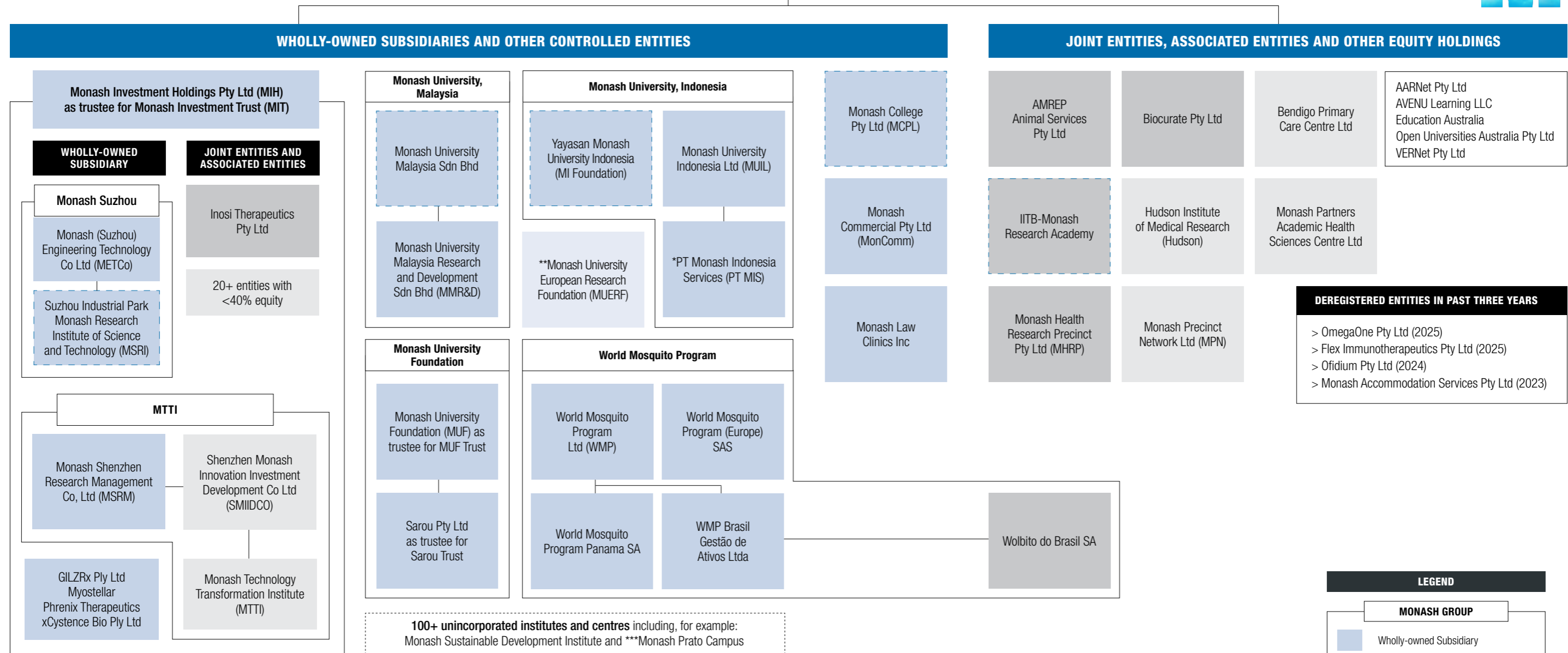
Mr Donald Speagle

LLB (Hons), BSc, MPA

Information about the current members of Council, including their skills and experience, is available on the Monash University website.

Overall governance and management

as at 31 December 2025



NOTES:

* PTMIS is listed as wholly-owned but has two shareholders, MU and MUIL (ie, the University has full control).

** MUERF is independent from the University. MUERF is governed by its Steering Council with Monash University being the sole member.

*** Formerly known as Monash Prato Centre.

- > (Controlled) Subsidiaries are those in which Monash is not the sole shareholder but has more than 50 per cent equity (i.e. control).
- > Jointly Controlled and Joint Venture Entities are those that have contractual arrangements which ensure control (or veto) in partnership with another shareholder.
- > Associated entities are typically between 20-50 per cent owned with the ability to exert significant influence over decisions, policies, etc.

- > Other equity holdings are typically below 20 per cent owned.
- > *PTMIS is listed as wholly-owned but has two shareholders, MU and MUIL (i.e. the University has full control).
- > **MUERF is independent from the University. MUERF is governed by its Steering Council with Monash University being the sole member.
- > MTTI cluster is in the process of being wound up (eta early 2026).

DEREGISTERED ENTITIES IN 2025:

- > OmegaOne Pty Ltd (14 May 2025) – Joint Venture/Jointly Controlled Entity
- > Flex Immunotherapeutics Pty Ltd (8 June 2025) – Wholly-owned Subsidiary

REPORTING ENTITIES

All controlled entities are within scope of this report. A staged approach to onboarding takes place due to the large number of entities. Each entity is assessed for risk in more detail during onboarding.

MONASH GROUP CONTROLLED ENTITIES

ENTITY NAME	JURISDICTION OF REGISTRATION
Campuses	
Monash University Malaysia Sdn Bhd > Monash University Malaysia Research and Development Sdn Bhd	Malaysia
Monash University Indonesia Foundation (Yayasan Monash University Indonesia) PT Monash Indonesia Services*	Indonesia
Other	
Monash College Pty Ltd	Australia
Monash Commercial Pty Ltd	Australia
Monash Investment Holdings Pty Ltd > Monash Investment Trust, Australia > Monash Shenzhen Research Management Co Ltd, China > Monash (Suzhou) Engineering Technology Co Ltd, China > Suzhou Industrial Park Monash Research Institute of Science and Technology, China > Myostellar Pty Ltd > Flex Immunotherapeutics Pty Ltd (<i>deregistered 8 June 2025</i>) > OmegaOne Pty Ltd (<i>deregistered 14 May 2025</i>) > Phrenix Therapeutics Pty Ltd > GILZRx Pty Ltd > xCystence Bio Pty Ltd	Australia
Monash University Indonesia Ltd	Australia
Monash University Foundation Pty Ltd	Australia
World Mosquito Program Ltd > World Mosquito Program Europe, France > WMP Brasil Gestão de Ativos Ltda, Brazil > World Mosquito Program Panama SA (<i>registered 3 January 2025</i>)	Australia France Brazil Panama
Monash University European Research Foundation ETS**	Italy

*PT Monash Indonesia Services has two shareholders: Monash University and Monash University Indonesia Limited.

**Monash University European Research Foundation ETS is independent of the University under Italian law. It is governed by its Steering Council with Monash University being the sole member.



OUR RANKINGS

#36 IN THE WORLD
QS WORLD UNIVERSITY RANKINGS 2026

#37 IN THE WORLD
QS SUSTAINABILITY RANKINGS 2026

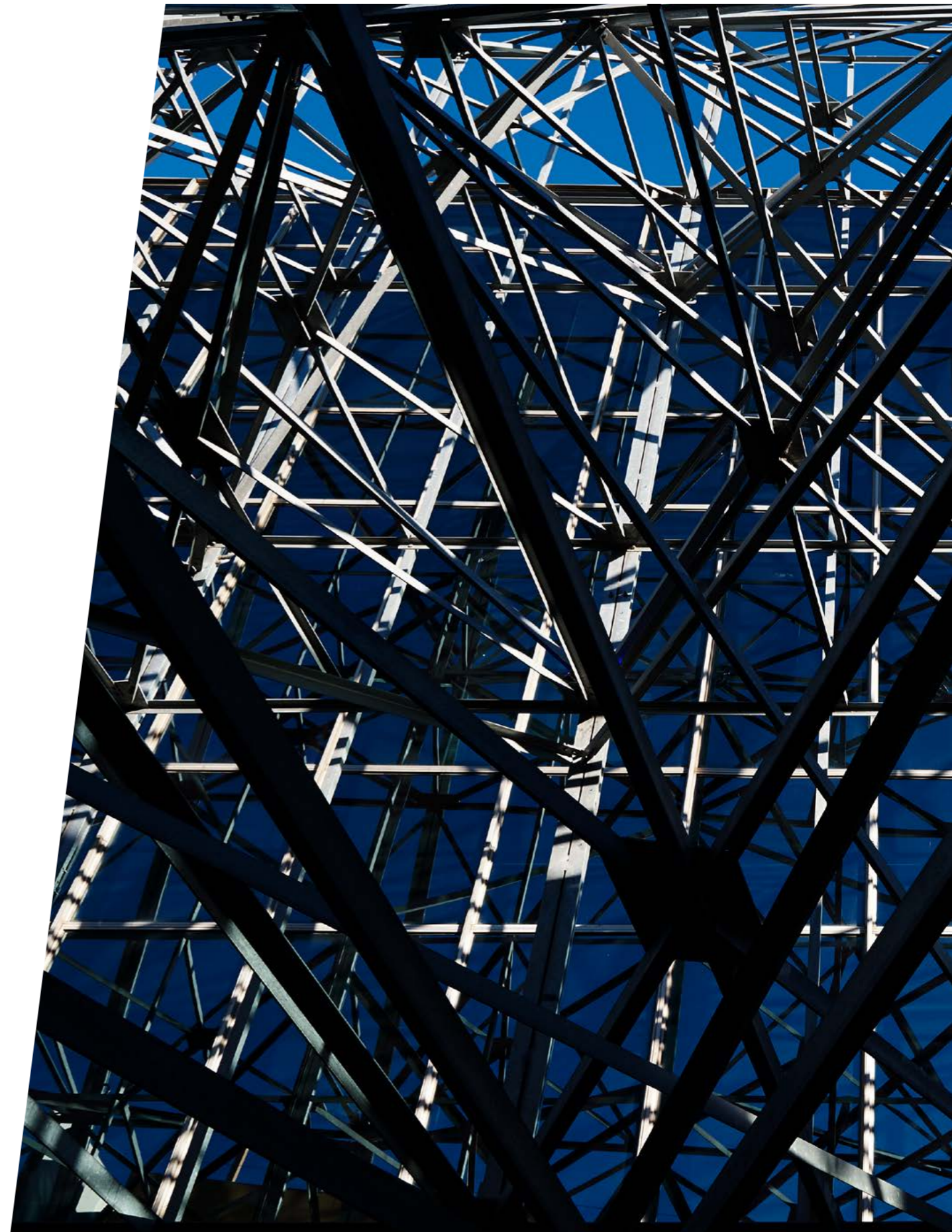
#38 IN THE WORLD
U.S NEWS AND WORLD REPORT 2025-2026

#58 IN THE WORLD
TIMES HIGHER EDUCATION WORLD UNIVERSITY RANKINGS 2026

#63 IN THE WORLD
TIMES HIGHER EDUCATION WORLD REPUTATION RANKINGS 2025

#76 IN THE WORLD
SHANGHAI ACADEMIC RANKING OF WORLD UNIVERSITIES 2025

OPERATIONS AND SUPPLY CHAIN



OUR GLOBAL FOOTPRINT

MONASH BOSTON HUB
CAMBRIDGE, USA

MONASH PRATO CAMPUS
PRATO, ITALY

MONASH UNIVERSITY MALAYSIA
BANDAR SUNWAY

MONASH SUZHOU 蒙纳士苏州
PARTNERSHIP WITH
SOUTHEAST UNIVERSITY
SUZHOU CHINA

INDIAN INSTITUTE OF TECHNOLOGY
BOMBAY (IITB -MONASH RESEARCH ACADEMY)
MUMBAI, INDIA

MONASH UNIVERSITY INDONESIA
BUMI SERPONG DAMAI (BSD) CITY,
SOUTH WEST JAKARTA

MONASH UNIVERSITY AUSTRALIA
CLAYTON, CAULFIELD, PARKVILLE,
PENINSULA, ALFRED AND MONASH
CITY CAMPUS

REPORT ON FINANCIAL OPERATIONS

UNDERLYING OPERATING PERFORMANCE

At an underlying operating result level, the Group incurred a \$309.1 million net result (2024: \$48.7 million net result) from core operations.

Underlying operating performance

	Group		Monash University	
	2024	2025	2024	2025
	\$million	\$million	\$million	\$million
Operating revenue	3776.4	4293.4	3473.1	3962.7
Operating expenses	3468.0	3713.3	3292.3	3576.6
Operating result	308.4	580.1	180.8	386.1
<i>Adjusted for:</i>				
Philanthropic funds ¹	(33.9)	(33.8)	(33.5)	(32.2)
Investment income	(225.8)	(237.2)	(153.3)	(153.2)
Fair value gains ²	7.7	(100.6)	5.0	(14.2)
Dividends/distributions reinvested	(182.8)	(65.0)	(85.6)	(38.2)
Other investments ³	(50.7)	(71.6)	(72.8)	(100.8)
Underlying result including non-recurring items	48.7	309.1	(6.0)	200.7

NOTES:

1. Donations are classified as either research income or philanthropic funds. In 2025, the Group recognised \$33.8 million as donations and bequests and \$49.5 million as predominantly research income.
2. Fair value gains reflect changes in the market value of both property and financial instruments.
3. Other investments include interest earned and trust contributions received.



RESEARCH

\$685 million

IN RESEARCH INCOME 2025



APPROXIMATELY

3000

ACTIVE RESEARCH PROJECTS

AROUND THE GLOBE



A LARGE AND VARIED number of research areas including significant representation in **MEDICINE, NURSING AND HEALTH SCIENCES (MNHS)**

STAFF HEADLINE FIGURES

MONASH UNIVERSITY, AUSTRALIA

Workforce disclosures (December 2024–December 2025)

	DECEMBER 2024							
	ALL EMPLOYEES		ONGOING		FIXED TERM		CASUAL	
	Number (Headcount)	FTE	Full-Time (Headcount)	Part-Time (Headcount)	Number (Headcount)	FTE	Number (Headcount)	FTE
GENDER								
Women Executives	13	13	1		12	12		
Women (total staff)	6110	5057	2441	621	2271	1880	777	311
Men Executives	12	12	1		11	11		
Men (total staff)	4273	3674	1954	135	1716	1445	468	197
Self-described Executives								
Self-described (total staff)	24	18	6		13	11	5	1
AGE								
15–24	503	285	48	8	99	83	348	149
25–34	2430	1953	700	77	1224	1023	429	177
35–44	3132	2732	1377	273	1293	1095	189	73
45–54	2469	2187	1310	218	793	675	148	60
55–64	1473	1290	798	132	449	370	94	33
Over 64	400	303	168	48	142	90	42	17
Total employees	10,407	8750	4401	756	4000	3336	1250	509

	DECEMBER 2025							
	ALL EMPLOYEES		ONGOING		FIXED TERM		CASUAL	
	Number (Headcount)	FTE	Full-Time (Headcount)	Part-Time (Headcount)	Number (Headcount)	FTE	Number (Headcount)	FTE
GENDER								
Women Executives	15	15	2		13	13		
Women (total staff)	6318	5180	2621	727	2324	1855	646	210
Men Executives	10	10			10	10		
Men (total staff)	4459	3827	2093	190	1761	1467	415	155
Self-described Executives								
Self-described (total staff)	27	23	10		16	12	1	1
AGE								
15–24	507	266	40	18	144	103	305	112
25–34	2531	2014	767	101	1291	1039	372	140
35–44	3230	2798	1449	345	1265	1064	171	52
45–54	2590	2294	1422	240	811	680	117	37
55–64	1512	1327	847	160	448	361	57	14
Over 64	434	331	199	53	142	88	40	12
Total employees	10,804	9029	4724	917	4101	3334	1062	366

Notes:

- > Last day period date: 2024 – 13/12/2024 and 2025 – 12/12/2025.
- > Dataset includes active paid staff members as at the last pay period date (Monash University Australian payroll staff only).
- > Staff on unpaid leave have been excluded from the dataset.
- > Active casual/sessional staff members who did not work have been excluded from the dataset.
- > Workforce figures are derived from the Department of Jobs, Skills, Industry and Regions definition, which requires active staff numbers for the relevant pay period of the year.

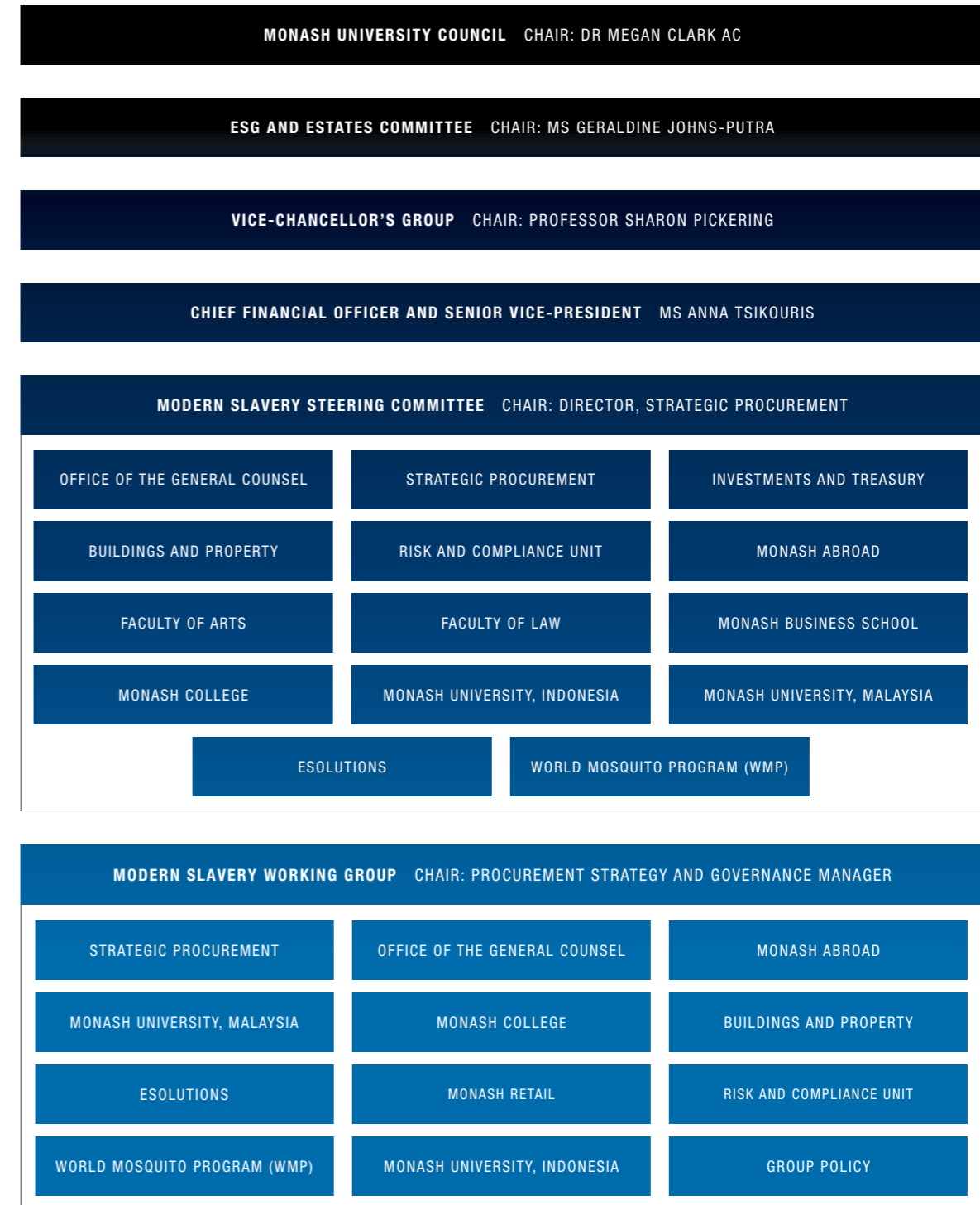
- > All roles covered by Monash enterprise agreements have been classified consistently with the Monash Enterprise Agreement (Academic and Professional Staff) 2024, and the Monash University Enterprise Agreement (Trades and Services Staff – Building and Metal Trades Staff) 2009. The University has a suite of policies and procedures that govern recruitment, selection and employment at the University. These are consistent with employment standards and provide for transparent operational governance, fair treatment and a commitment to a culture of integrity and professionalism with equity, diversity and inclusion being key pillars of these policies and procedures.

MODERN SLAVERY GOVERNANCE STRUCTURE

Monash has a clearly defined governance structure supported by research and academic leaders to oversee the development and implementation of the University's program of work to reduce modern slavery.

The remit of this structure is to develop, review and refine the University's response to modern slavery within our operations and supply chains.

As the modern slavery program of work is managed by Strategic Procurement, escalations are managed from Strategic Procurement to the Chief Financial Officer and Senior Vice-President, who is a member of the Vice-Chancellor's Group.





ENVIRONMENTAL, SOCIAL AND GOVERNANCE

Monash University has renewed its sustainability commitments with a new [Environmental, Social and Governance \(ESG\) Statement](#).

Our ESG Statement sets out our priorities to foster sustainable and responsible practice. Monash has reported annually on progress against its ESG priorities since 2023. The new ESG Statement expands upon the previous statements. Reducing the occurrence of modern slavery is one of the core themes articulated in the ESG Statement, and reporting on the University's progress to address modern slavery is integrated into the University's annual ESG reporting framework.

In 2025, this included regular updates to the ESG and Estates Committee, a Standing Committee of University Council, which assists Council in its responsibilities.

CONTRIBUTING TO THE HIGHER EDUCATION SECTOR

Monash University is an active member of the Australasian Universities Procurement Network (AUPN) which represents the Australasian and New Zealand higher education sector. Through the AUPN, we help to develop a sector-wide approach to excellence in procurement, including a specific AUPN program of work for modern slavery. This program of work continues to reduce risk across the sector.

Supply chain Third party spend in 2025

**TOTAL THIRD
PARTY SPEND:
\$1.34 billion**

- > **9995** suppliers
- > **74** countries
- > **80%** of spend with **353** suppliers
- > **\$117.6 million** high-risk category spend
- > **\$16.81 million** high-risk country spend

**NEW SUPPLIER
ONBOARDING:**

- > **1374** fully onboarded new suppliers created in 2025
- > **1563** new one-time vendors
- > **2937** new suppliers created in 2025

**MONASH
UNIVERSITY
INVESTMENTS
IN 2025**

- > **over \$3 billion invested**
(including the Monash University Foundation Trust)

The largest areas of investment were:

- > Term deposits
- > Australian and international equities
- > Core fixed interest
- > Alternative debt
- > Investment properties



THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

Annual and specific modern slavery risks are identified using an integrated approach. Modern slavery-related risks identified through the modern slavery program are generally managed within the program of work and documented in this annual report. When required, risks will be escalated through the University's management structure.

The program contains recurring annual tasks and specific tasks for each year. New tasks are added to the works program on a prioritised basis, including the ability to add new tasks to the program in real time if required. Modern slavery risks may also be identified from other avenues external to the modern slavery program. These may occur through our grievance mechanisms or through affiliations, policies, procedures, processes, instructions or news articles.

Avenues for Assistance and Disclosures

ASSISTANCE IN AUSTRALIA:

If urgent help is required including immediate threats to life or wellbeing:

- > **Phone Triple Zero (000)** and ask for the Police. Translators are available.

For assistance with less urgent concerns, an investigator will be assigned to help via the following avenues:

- > **Phone Australian Federal Police on 131 237 (131 AFP)**, contact via the [AFP website](#) or make a [report online](#).
- > Anonymously via Crime Stoppers. **Phone 1800 333 000** or visit the [Crime Stoppers Australia website](#).

For modern slavery-related support services for yourself or others:

- > The [Attorney General's Modern Slavery Support Services](#) webpage.

ASSISTANCE IN OTHER COUNTRIES

the University has wholly-owned entities in:

CHINA

- > **Local Chinese police: Dial 110** for the Public Security Bureau (PSB). Reporting foreign-involved, state-related, or sensitive forced labour cases to local police can have unexpected outcomes – care should be used.
- > **Emergency services: Dial 120 for an ambulance or 119 for the fire department** if the situation involves immediate physical harm.

Options for advice and assistance include:

- > **Local embassies and consulates:** Contact the 24-hour Consular Emergency Centre at +61 2 6261 3305 (Australian citizens who are overseas).
- > Non-governmental organisations such as [WalkFree](#) and [Human Rights Watch](#).
- > Seek advice from Monash University's Strategic Procurement team: antislavery@monash.edu.

INDIA

If urgent help is required (including immediate threats to life or wellbeing) call:

- > **Ambulance: 102**
- > **Fire: 101**
- > **Police: 100**

Options for advice and assistance include:

- > **Anti-Trafficking Helpline (Ministry of Home Affairs)**, Telephone: 1800 419 8588
- > **CHILDLINE India (Ministry of Women and Child Development, NGO)**, Telephone: 1098

INDONESIA

If urgent help is required (including immediate threats to life or wellbeing) call:

- > **General Emergency number: 112**
- > **Police: 110**
The police also have units specialising in modern slavery.

Options for advice and assistance include:

- > **For migrant care and protection:** indonesia.iom.int

ITALY

If urgent help is required (including immediate threats to life or wellbeing) call:

- > **General European emergency number: 112**
- > **State Police: 113**

Options for advice and assistance include:

- > **National Hotline Against Trafficking (Department for Equal Opportunities, Government of Italy)**, Telephone: 800 290 290

MALAYSIA

If urgent help is required (including immediate threats to life or wellbeing) call:

- > **Ambulance: 999**
- > **Fire: 994**
- > **Police: 999**

Options for advice and assistance include:

- > **National Anti-Slavery hotline - Council for Anti-Trafficking in Persons and Anti-Smuggling of Migrants (Government of Malaysia)**, Telephone: 03-8000 8000

UNITED STATES OF AMERICA

If you or someone else is in immediate danger, call:

- > **Emergency services: 911**

Options for assistance include:

- > **National Human Trafficking Hotline (U.S. Department of State)**, Telephone: +1-888-373-7888

GENERAL PROGRAM FEEDBACK OR CONCERNS

Within our Modern Slavery Act Report, we provide an email address which is monitored and may be used to disclose concerns, ask questions, or provide feedback on the report: antislavery@monash.edu

WHISTLEBLOWER DISCLOSURES

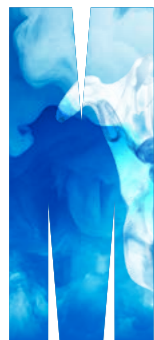
Monash University has a robust, publicly accessible whistleblowing policy in place to manage whistleblower disclosures.

Whistleblower disclosures may be made via:

- > Email: whistleblower@monash.edu
- > Publicly available [online disclosure form](#)

The [Whistleblower Disclosures website](#) also highlights available external avenues:

- > Under Commonwealth legislation, disclosing directly to an eligible recipient of the University or a related body corporate, or certain external agencies, such as the Australian Securities and Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA) and, in the case of a disclosure regarding tax affairs, the Australian Taxation Office (ATO).
- > Under Victorian legislation, a whistleblower disclosure (called a 'public interest disclosure') can only be made to the Independent Broad-based Anti-Corruption Commission (IBAC) and, in relation to administrative actions of the University, the Victorian Ombudsman (VO). For information on how to make a disclosure to IBAC and the Ombudsman, contact [IBAC](#) or the [VO](#).
- > As well as prescribing who can receive a whistleblower disclosure, Commonwealth and Victorian legislation prescribes certain rules for who can make a whistleblower disclosure, who and what the disclosure can be about, and the protections afforded to whistleblowers.



INTERNAL ACCOUNTABILITY

The University has appointed a Whistleblower Coordinator to be responsible for:

- > Receiving and handling whistleblower disclosures on behalf of the University.
- > Dealing with queries about whistleblower disclosures in relation to the University.
- > Ensuring the University carries out its responsibilities under Commonwealth and Victorian legislation and IBAC Guidelines.
- > Liaising with IBAC and the VO.
- > Ensuring whistleblower disclosures made to the University are appropriately investigated.

The Chief Operating Officer and Senior Vice-President was the Monash Whistleblower Coordinator for 2025.

OTHER AVENUES

There are other avenues which may identify modern slavery risks. Where applicable, matters identified through these avenues may be treated as whistleblower events and, if appropriate, transitioned to the whistleblower process while maintaining end-to-end whistleblower protections.

OTHER SUPPORTING POLICIES, PROCEDURES, PROCESSES AND INSTRUCTIONS TO IDENTIFY AND CONTROL RISKS

The following policies, processes and instructions may be avenues by which we either hear of concerns or manage and reduce risks.

Policies

POLICY	ROLE
Procurement Policy	Mandatory modern slavery, responsible procurement components
Group Risk Management and Compliance Policy	Setting risk and compliance appetites including non-negotiables
Staff Code of Conduct	Acceptable and unacceptable behaviours and avenues to address concerns
Student Code of Conduct	Acceptable and unacceptable behaviours and avenues to address concerns
Equity, Diversity and Anti-discrimination Policy	Preventing discrimination
Health Safety and Wellbeing Policy	Placing health, safety and wellbeing as a key requirement
Mental Health Policy	Recognising mental health issues – and that not all harm is physical – and help is available
Sexual Harm Prevention and Response Policy	Setting clear boundaries and responses to concerns

BUSINESS PROCESSES AND INSTRUCTIONS	ROLE
Contract templates	Includes three different modern slavery model clauses
Tender templates	Modern slavery questions and requirements including related scoring. Internal approvals required at tender planning and outcome stages
Supplier onboarding process	Includes a modern slavery gate for onboarding
Standardised modern slavery clauses	Including low-risk, high-risk, and high-risk electronics clauses
Modern slavery online training	For all new staff, and mandatory for senior executives, lawyers and those working in procurement or with key purchasing roles
Modern Slavery contract template training	Live training including explaining clauses, their applications scenarios, and negotiation methods

A full list of policies is available at the [Monash University Policy Bank](#).

Dimensions of our supply chain

MONASH UNIVERSITY AUSTRALIA

2025 Spend

SPENT **\$1.34B**

WITH ITS SUPPLIERS OF GOODS AND SERVICES.

- > Research equipment
- > Refurbishment works
- > Facilities and services
- > Information Technology

MONASH UNIVERSITY MALAYSIA

SPENT **\$26.4M**

WITH ITS SUPPLIERS OF GOODS AND SERVICES.

- > Research equipment
- > Construction and refurbishment
- > Laboratory supplies
- > Events

MONASH COLLEGE

SPENT **\$6.8M**

WITH ITS SUPPLIERS OF GOODS AND SERVICES.

- > Information Technology
- > Financial and Insurance services
- > Library

MONASH UNIVERSITY INDONESIA

SPENT **\$0.7M**

WITH ITS SUPPLIERS OF GOODS AND SERVICES.

- > Information Technology
- > Advertising
- > Facility Management
- > Furniture

WORLD MOSQUITO PROGRAM

SPENT **\$11.2M**

WITH ITS SUPPLIERS OF GOODS AND SERVICES.

- > Contractors and consulting
- > Travel
- > Information Technology



ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISKS, DUE DILIGENCE, AND REMEDICATION

INCREASING SUPPLY CHAIN TRANSPARENCY THROUGH ASSESSMENT AND MONITORING

This year we have increased the transparency of 25 work sites within our supply chain through assessment and monitoring. This was achieved by providing information on some of the high-risk products we buy from our supply chain to our affiliates. Reports are provided by our affiliates on each site when available each year, with their scope usually consisting of a combination of existing sites and newly-identified sites. Existing sites may re-appear with updated information, as addressing and remediating sites of concern may take more than a year.

We utilise 'tiers' when referring to various levels of our supply chain.

Tier 1 suppliers are those we directly purchase from.

Tier 2 suppliers are the suppliers our tier 1 suppliers purchase from.

Tier 3 are the suppliers of the tier 2 suppliers.

Tier 4+ are the suppliers of the tier 3 suppliers.

For products, tiers typically go all the way back to where the key raw materials originally came from. These can include farms and mines.

The number of tiers may vary depending on what is produced and the various production stages.

The tier number increases as we progress deeper into our supply chain, which reduces our visibility of the activity that occurs in the supply chain.

Some sites may undertake work in more than one supply chain tier. These factories and mines are known to be in the supply chain of the University for specific products that the University purchases. Where an identified concern exceeds one year (as most do), the number of sites will include those being monitored or worked with previously.

Supply chain assessments are done by the University and our affiliates. Assessment methods used by our affiliates include:

- > Questionnaires
- > Interviews (in-person and video/audio)
- > Audits
- > Official government and workplace documents
- > Less formal methods (e.g. news articles and internet forums frequented by at-risk staff).

Direct assessment methods by the University include tender questions, specific questionnaires and face-to-face discussions. Data provided by affiliates in combination with our internal data – including our detailed spend data – enables enhanced insights into our supply chain. These insights are explained further below.

SUPPLY CHAIN VISIBILITY

As part of its modern slavery program, the University continuously improves its supply chain transparency internally and through its affiliates. Supply chain visibility changes each year depending on purchases made.

Reports received by Monash from global not-for-profit affiliates are focused on identifying, reducing and addressing modern slavery. Reports are based on a mix of first-hand audits, interviews, public documents such as court records, remote audio/video interviews, and less formal techniques such as monitoring internet forums that staff who may be at risk are known to utilise.

In 2025 we introduced a supplier risk assessment system in order to drive additional transparency and further identify risks in our supply chains. Moody's Compliance Catalyst was selected and implementation commenced in 2025. Work continues to fully integrate the system and its risk assessments into procurement practices. The new Compliance Catalyst system increases the transparency of assessed suppliers, including but not limited to:

- a. Probability of default
- b. Foreign interference/sanctions
- c. ASIC and other government records, including ownership and directorship
- d. Reputational Risk score
- e. Corruption/Bribery issues
- f. Tax evasion
- g. Money Laundering
- h. Anti-competitive practices
- i. Fraud
- j. Misleading practices including greenwashing
- k. Subsidiary/parent monitoring
- l. News monitoring for negative sentiment news
- m. Cyber risk including breaches
- n. Industry level events that may impact the supplier materially.

The system will support an integrated risk approach to suppliers, to build on our existing country and industry-based risk assessments for modern slavery. This more comprehensive approach further improves our supply chain transparency.

CLASSIFYING IDENTIFIED ISSUES – VIOLATIONS VS RISKS

Assessments may include classifying issues either as risks or violations. Violations are generally determined based on a violation of the human rights laws of the country in which a work site is located, and where there is sufficient evidence to prove that a violation has occurred. Risks are identified when there is sufficient evidence to prove that a potential violation of human rights laws exists, but there is insufficient evidence to prove that a violation has occurred. This classification methodology has been adopted from Electronics Watch, a not-for-profit that the University works with to identify and reduce risk in its electronics supply chain.

Details are purposefully kept at a high level to protect ongoing risk reduction, mitigation and monitoring work being done by our affiliates.

ENHANCING SUPPLY CHAIN DUE DILIGENCE

Last year's due diligence to increase supply chain transparency, conducted in collaboration with our affiliates, identified a number of issues. These were detailed in our [Modern Slavery Act Report 2024](#). The report included findings on supply tier, country, identified violations, and risks, as well as the status of related improvements and remediation efforts.

A key finding from this work was the identification of a significant event at a Tier 2 supplier. The nature of their actions were such that it brought into question the continued involvement with the supply chain utilising the work site, regardless of remediation efforts. The supplier's action necessitated a change in our approach – recognition that there may be circumstances where the University should assess whether we cease to purchase products or services from the supply chain linked to the violation, and instead seek an alternative supply chain.

This change means that specific products or services from a supplier may be subject to a purchasing cessation or other action, with a competing product or service likely to be purchased in their place. The timing of this decision could result in either the cancellation of existing purchase orders or the exclusion of the relevant products or services from current or future tenders. However, an additional layer of complexity must be considered: taking such strong action to cease procurement could inadvertently jeopardise ongoing remediation, negotiations, and, most importantly, the safety of the victims.

Events of this nature will include consultation with stakeholders and any relevant affiliates. Before any action of this type is undertaken, the University must be satisfied that the action is reasonable, and approval from the Chief Financial Officer and Senior Vice-President must be obtained.

REVISED APPROACH TO SUPPLY CHAIN RISKS AND VIOLATIONS

In response to these findings, we have implemented the following changes to our approach:

- > Severity assessment: When reviewing identified supply chain risks and violations, we will now specifically assess whether any of a supplier's actions were so severe that continued business is unacceptable, regardless of remediation efforts.
- > Consultation with affiliates: If such a severe violation is identified, we will discuss the implications of ceasing business with our affiliates. The safety and wellbeing of the victims will remain our primary concern throughout these discussions.
- > Resulting actions may include:
 - Cessation of purchase orders: We may cancel purchase orders, without explanation or citing an irreconcilable concern with an entity in their supply chain. While this action may result in the tier-two supplier learning the reason for the cessation, it ensures a clear and principled stance. A supplier that we purchase from directly would then be deactivated in our systems to prevent further ordering.
 - Tender exclusion: We may exclude the supplier from tenders or parts of tenders, and notify them of our concern with an entity in their supply chain. We may choose not to notify the supplier as to why they have not been successful, if it may cause harm to victims and mitigation efforts underway.
 - No action (under specific circumstances): This is a rare and highly unlikely scenario reserved for cases where our affiliates have advised that any action would directly place victims at risk. In such an event, an internal escalation to the Chief Financial Officer and Senior Vice-President would occur to ensure all options are appropriately considered before we either continue with the purchase or tender, or take no action. The safety and wellbeing of victims will always be our foremost priority.

This new approach ensures that our procurement decisions are aligned with our values while remaining adaptable and sensitive to the complexities of supply chain remediation and victim safety.



UNDERSTANDING THE RISKS BY ANALYSING OUR 2025 SUPPLIER SPEND IN DETAIL

IMPROVING TRANSPARENCY IN OUR SUPPLY CHAIN

Insights through spend analytics

We track and monitor our spend with our suppliers, which we define as third parties through which the University purchases goods and services. Certain exceptions have been excluded selectively from our analysis as they cannot be influenced (such as mandatory tax payments to the ATO).

We analyse our supplier spend in detail each year to identify and assess our risks and risk reduction coverage. The modern slavery program assesses risks in all supplier spend and utilises well-regarded sources, such as the [International Labour Organization \(ILO\)](#) and the [Walk Free Global Slavery Index](#), to identify country, industry and import risks.

HOW WE IDENTIFY AND TARGET OUR SPEND AND THE MODERN SLAVERY RISKS THAT COMES WITH IT

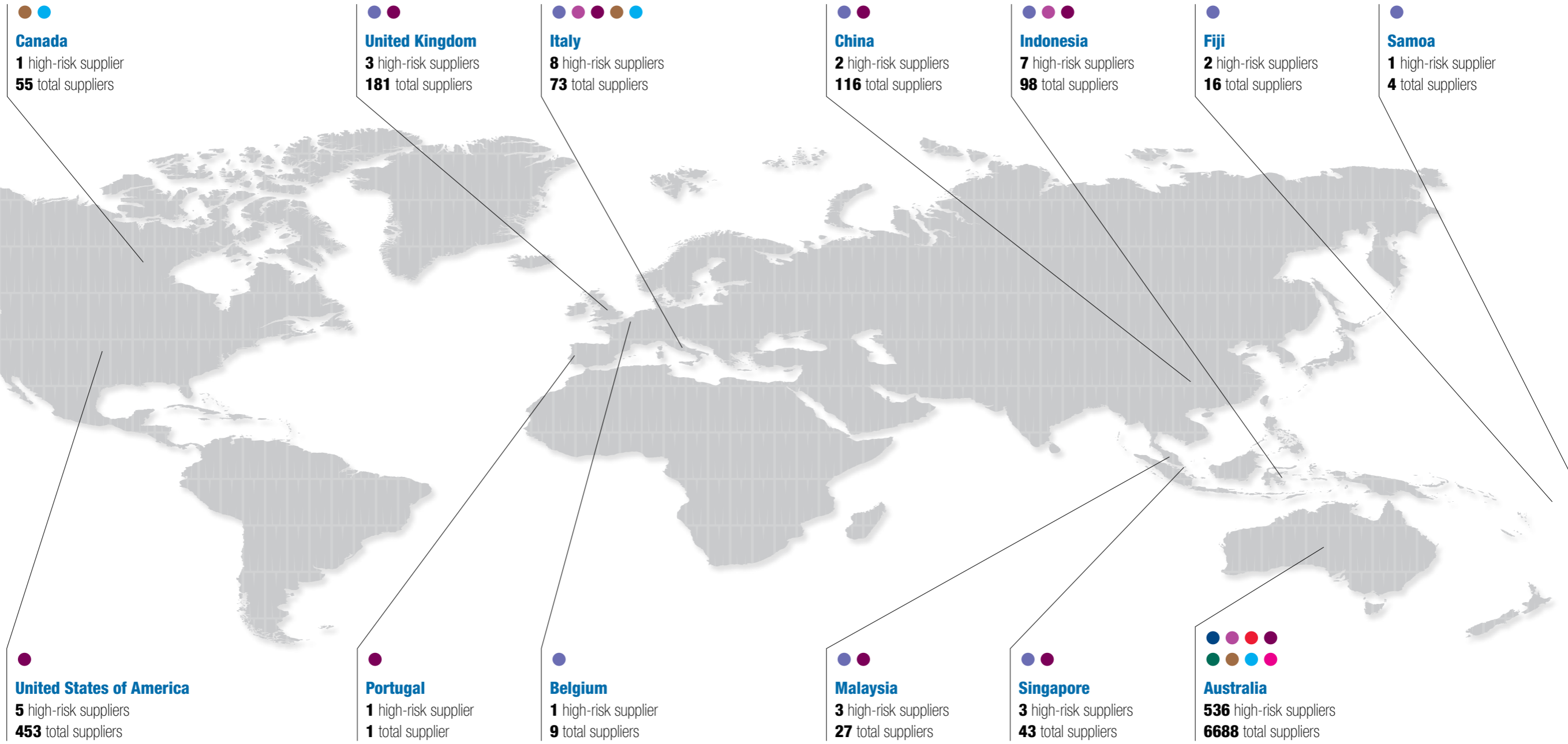
High-risk spend categories are identified primarily according to a supplier's country and industry. Risk is assessed at the line item level – ie the specific item being purchased – as a supplier's location and industry may not be representative of the modern slavery risk found in all the goods and services they sell.

Direct spend in high-risk categories

CATEGORY SPEND	SUPPLIER COUNT
Catering	478
Desktop Accessories	114
Safety Supplies	65
Staff Supplies	65
Cleaning	55
Information Technology Networks	38
Desktop Hardware	34
Security & Parking	22
Telecommunications Equipment	14
Furniture, Fittings & Equipment	8
Mobile Devices & Accessories	6
Printing	6



OUR DIRECT SUPPLIER AND COUNTRY INSIGHTS



- APPAREL
- FURNITURE
- SECURITY
- CONSTRUCTION SERVICES
- CATERING
- CHEMICALS
- PARKING
- PROMOTIONAL MATERIALS
- CLEANING
- PRINTING
- STAFF SUPPLIES
- ELECTRONICS
- SAFETY SUPPLIES
- ANIMAL SUPPLIES



OTHER COUNTRIES

- | | | | | |
|-------------|--------------------|----------------------|----------------|----------|
| Netherlands | Pakistan | Finland | Nigeria | Bulgaria |
| Germany | Switzerland | United Arab Emirates | Romania | Serbia |
| Thailand | Denmark | South Africa | Cameroon | Poland |
| Bangladesh | Ireland | Laos | Norway | Estonia |
| Taiwan | Korea, Republic Of | Hungary | Ukraine | Myanmar |
| Japan | Belgium | Philippines | Czech Republic | Iran |
| France | Sri Lanka | Spain | Georgia | |
| Cambodia | Israel | Sweden | Ghana | |

KEY RESULTS FROM REPORTS ON OUR SUPPLY CHAIN

In 2025 we sought to further utilise the data from our affiliate reports in an effort to gain an even deeper understanding of our supply chain. We assessed whether there were patterns or potential early indicators across the entire data set in addition to identifying events of concern and their remediation.

Manual transcription of affiliate reports has been used in previous years. Due to the volume of reports and differences in source templates, in 2025 a two-step process was undertaken. An initial review of reports was undertaken manually as per previous years. This was followed by an additional second data extraction from affiliate reports undertaken using Artificial Intelligence (AI) to identify possible efficiencies in manual data transcription. The AI extracts showed a slight accuracy improvement and a material time saving. After comparing key data points of the manual vs AI data extractions, the AI data extract was used as the baseline for reviewing affiliate report data in 2025.

In 2025, there was a recurring trend of a clear concentration of risks and violations by geography, tier and supplier. We also identified important differences between early-stage risk identification and confirmed violations. Occupational health and safety risks are frequently identified before escalation (indicating effective early controls), while discrimination and recruitment-related issues are more likely to surface only when violations occur. Tier 3 suppliers have the most, but mixed Tier 2 and 3 suppliers are over-represented in violations, suggesting work site complexity increases compliance failure. These patterns support a shift toward targeted, tier-specific prevention strategies and stronger early-warning indicators for discrimination and labour management risks.

The following section utilises work site report data from our affiliates to analyse our supply chain more deeply – beyond the suppliers we directly purchase from. The data is related to specific work sites that our direct suppliers have in their supply chain.

REPORT-LEVEL VIEW

METRIC	NUMBER
Affiliate reports interrogated	41
Distinct issue categories observed	15
Reports with ≥1 violation category	28
Reports with ≥1 risk category	38
Reports with both violation(s) and risk(s)	25
Reports with risks only (no violations)	13
Reports with violations only (no risks)	3
Countries represented (report-level)	6
Unique facilities (by exact name)	25



MOST PREVALENT ISSUES

ISSUE CATEGORY	REPORTS W/ VIOLATIONS (N)	REPORTS W/ RISKS (N)	REPORTS W/ VIOLATIONS AND/OR RISKS (N)	% OF REPORTS W/ VIOLATIONS AND/OR RISKS
Excessive working hours	14	16	30	73
Occupational health & safety	6	24	30	73
Failure to pay legal wages	11	16	27	66
Forced labour	10	16	26	63
Discrimination in hiring and occupation	16	6	22	54
Poor recruitment and employment conditions	16	3	19	46
Violence and harassment	5	5	10	24
Lack of freedom of association / collective bargaining	4	5	9	22
Poor termination / dismissal practices	7	1	8	20
Living wages	2	2	4	10

- > Occupational health and safety issues are mostly recorded as a risk (24 reports) rather than as a more serious violation (six reports).
- > Discrimination in hiring/occupation and poor recruitment and employment conditions skew strongly toward violations (16 of the 22 reports and 16 of the 19 reports respectively).

HOW ISSUES ARISE

REPORT ISSUE PROFILE	REPORTS	% OF REPORTS
Both violation(s) and risk(s)	25	61
Risks only	13	32
Violations only	3	7

QUARTER VIEW (REPORT-LEVEL)

QUARTER	REPORTS	% OF REPORTS	SUSPENDED REPORTS	AVERAGE TOTAL CATEGORIES (V+R)	AVERAGE VIOLATION CATEGORIES	AVERAGE RISK CATEGORIES
Q1	9	22.0	1	4.9	2.1	2.8
Q2	11	26.8	6	4.3	1.7	2.6
Q3	12	29.3	2	5.1	2.6	2.5
Q4	9	22.0	0	4.9	2.4	2.4

Suspended reports include closed and remediated issues, in addition to instances where there is insufficient evidence to continue.

COUNTRY VIEW (REPORT-LEVEL)

CHINA

(27 reports, 16 facilities, 136 risks or violations)

- > Risk-heavy: average 68 per cent of categories per report are risks; Risk: Violation ratio 1.89
- > 96 per cent of China reports include risks; 67 per cent include violations.
- > Dominant risk categories: Occupational health and safety, forced labour, working hours, legal wages.
- > Dominant violation categories: discrimination, recruitment and employment conditions.

MALAYSIA

(5 reports, 3 facilities, 9 risks and violations)

- > Very risk-heavy: Average 90 per cent of categories are risks; Risk: Violation ratio 8.0
- > Occupational health and safety appears in 100 per cent of reports as a risk (no Occupational health and safety violations in Malaysia).

TAIWAN

(3 reports, 2 facilities, 27 risks and violations)

- > Violation-heavy: Average 11 per cent risk share; Risk: Violation ratio 0.12
- > Very high breadth: Approximately nine categories per report on average.

INDIA

(3 reports, 2 facilities, 8 risks and violations)

- > Mixed, but more violations (approximately 39 per cent risk share).
- > All three reports cited recruitment and employment conditions as violations.
- > Occupational health and safety shows up mainly as risk.

DEMOCRATIC REPUBLIC OF THE CONGO (DRC) (two reports, one work site, 12 violations)

- > Violations only.
- > Recurrent: legal/living wages, discrimination, recruitment, termination, freedom of association.
- > Limited data set.

THAILAND

(1 report, 1 work site, 4 risks and violations)

- > Forced labour and recruitment as violations, working hours and legal wages as risks.
- > Limited data set.

REPORTS BY COUNTRY

COUNTRY	REPORTS	% OF REPORTS
China	27	65.9
Malaysia	5	12.2
Taiwan	3	7.3
India	3	7.3
DRC	2	4.9
Thailand	1	2.4
Total	41	100

FACILITIES BY COUNTRY

COUNTRY	FACILITIES	% OF FACILITIES
China	17	63.0
Malaysia	4	14.8
Taiwan	2	7.4
India	2	7.4
Thailand	1	3.7
DRC	1	3.7

CATEGORY PAIRS MOST OFTEN IDENTIFIED TOGETHER IN REPORTS

CATEGORY A	CATEGORY B	REPORTS WITH BOTH	% OF REPORTS
Excessive working hours	Forced labour	26	63.4
Excessive working hours	Occupational health and safety	22	53.7
Excessive working hours	Failure to pay legal wages	20	48.8
Forced labour	Occupational health and safety	20	48.8
Failure to pay legal wages	Occupational health and safety	20	48.8
Forced labour	Failure to pay legal wages	19	46.3

WORK SITE VIEW

COUNTRY SHARE OF TOTAL

COUNTRY	RISK COUNT	RISK SHARE OF TOTAL (%)	VIOLATION COUNT	VIOLATION SHARE OF TOTAL (%)
China	74	83.1	65	74.7
Malaysia	11	12.4	10	11.5
India	2	2.3	4	4.6
Thailand	2	2.2	2	2.3
Democratic Republic of the Congo	0	0.0	6	6.9
Total	89	100	87	100

Findings are heavily concentrated in China (83 per cent of risks; 75 per cent of violations). The top three issue types account for around 47 per cent of both risks and violations. A small number of factories account for a disproportionate share of total issues. However the effectiveness of our conclusions is reduced due to the limited data set and the number of reports from China.

RISKS AND VIOLATIONS BY TIER

TIER	RISK COUNT	RISK SHARE OF TOTAL	VIOLATION COUNT	VIOLATION SHARE OF TOTAL
Tier 2	14	15.7%	13	14.9%
Tier 3	67	75.3%	55	63.2%
Tier 2 and Tier 3	8	9.0%	13	14.9%
Mining sector	0	0.0%	6	6.9%
Total	89	100%	87	100%

Tier 3 overall has the highest results with 75 per cent of risks and 63 per cent of violations. Tier 2 & Tier 3 suppliers account for a disproportionately high share of violations relative to their risk flags, while mining appears only on the violation side in this dataset.

VIOLATION TYPES (TOTAL COUNT AND PERCENTAGE OF ALL VIOLATIONS)

Total violations counted: 87

VIOLATION TYPE	COUNT	PER CENT (%)
Discrimination in hiring and occupation	15	17.2
Excessive working hours	13	14.9
Poor recruitment and employment conditions	13	14.9
Failure to pay legal wages	11	12.6
Forced labour	11	12.6
Occupational health and safety	9	10.3
Violence and harassment	6	6.9
Abusive termination of employment	5	5.7
Lack of freedom of association and the right to collective bargaining	3	3.4
Living wages	1	1.1

VIOLATIONS ARE CONCENTRATED IN A SMALL NUMBER OF CATEGORIES

- > The top three violation types:
 - Discrimination in hiring and occupation (17.2 per cent)
 - Excessive working hours (14.9 per cent)
 - Poor recruitment and employment conditions (14.9 per cent)
- > Together account for approximately 47 per cent of all violations.

Nearly half of all identified violations fall into just three categories, indicating clear priority areas for remediation and engagement.

LABOUR-RIGHTS AND EMPLOYMENT PRACTICES LEAD

- > When grouped conceptually, violations related to working conditions and employment practices (working hours, wages, recruitment and discrimination) account for the majority of all violations.
- > This suggests the primary drivers are systemic labour management issues rather than isolated safety incidents.

The violation profile points to structural labour management challenges rather than one-off compliance failures.

DISCRIMINATION IS THE SINGLE MOST COMMON VIOLATION

- > Discrimination in hiring and occupation accounts for 17.2 per cent, making it the largest single violation category.
- > This is higher than forced labour, wages or occupational health and safety individually.

Discrimination-related violations are more prevalent than any other single category, highlighting inclusion and fairness as a core compliance risk.

WORKING HOURS REMAIN A PERSISTENT ISSUE

- > Excessive working hours represent 14.9 per cent of all violations.
- > This category frequently co-occurs with:
 - Poor recruitment and employment conditions
 - Failure to pay legal wages
 - Occupational health and safety.

Excessive working hours appear as a recurring root-cause issue, often linked to multiple other violation types.

FORCED LABOUR AND WAGES REMAIN MATERIAL BUT NOT DOMINANT

- > Forced labour (12.6 per cent) and failure to pay legal wages (12.6 per cent) together represent approximately 25 per cent of all violations.

While forced labour and wage violations remain significant, most violations relate to broader employment conditions.

LESS FREQUENT VIOLATIONS STILL MATTER

- > Lower-frequency categories (e.g. living wages, lack of freedom of association, abusive termination) each represent between one and six per cent individually.
- > Collectively, these still account for approximately 20 per cent of all violations.

Lower-frequency violations collectively represent a meaningful share, and are important for undertaking comprehensive due diligence.

RISK TYPES (COUNT AS A PERCENTAGE OF ALL RISKS)

Total risks counted: 89

RISK TYPE	COUNT	PER CENT (%)
Occupational health and safety	18	20.2
Excessive working hours	12	13.5
Failure to pay legal wages	12	13.5
Forced labour	12	13.5
Lack of freedom of association and the right to collective bargaining	7	7.9
Discrimination in hiring and occupation	6	6.7
Violence and harassment	4	4.5
Environmental issues	3	3.4
Exploitation of child labour and young workers	3	3.4
Poor recruitment and employment conditions	3	3.4
Living wages	2	2.2
Excessive working hours	2	2.2
Wages and benefits	2	2.2
Freedom of employment	1	1.1
Fair recruitment	1	1.1
Termination of employment	1	1.1

OCCUPATIONAL HEALTH AND SAFETY IS THE DOMINANT RISK

- > Occupational health and safety (OHS) accounts for 20.2 per cent of all risks, making it the single largest risk category. It stands clearly ahead of any other individual risk type.
- > OHS represents the most prevalent risk area, indicating persistent exposure even where violations may not yet be confirmed.

A TIGHT CLUSTER OF RELATED LABOUR RISKS

- > Three risk types together account for 40.5 per cent of all risks:
 - Excessive working hours (13.5 per cent)
 - Failure to pay legal wages (13.5 per cent)
 - Forced labour (13.5 per cent).

Core labour rights risks cluster closely together. This suggests interconnected drivers such as production pressure, labour sourcing and workforce management.

RISK EXPOSURE IS BROADER THAN VIOLATION EXPOSURE

- > Risk types include a longer list of less frequent issue types (e.g. environmental issues, freedom of employment, fair recruitment, termination of employment).
- > Each of these individual risks have a small chance of occurring.
- > This contrasts with violations, which are more concentrated in fewer categories.

The risk profile is more diverse than the violation profile, reinforcing the value of early-stage risk identification before issues crystallise into violations.

LACK OF FREEDOM OF ASSOCIATION REMAINS A MATERIAL FORWARD-LOOKING RISK

- > Lack of freedom of association and the right to collective bargaining represents 7.9 per cent of all risks.
- > Its prominence as a risk rather than a violation suggests structural or governance barriers that may not yet have triggered formal findings.

Freedom of association appears more frequently as a risk than as a violation. This indicates latent exposure that may escalate without intervention.

DISCRIMINATION APPEARS MORE OFTEN AS A VIOLATION THAN A RISK

- > Discrimination in hiring and occupation accounts for 5.6 per cent of risks but a higher share of violations in the companion table.

Discrimination is more likely to be identified after it has occurred, rather than flagged early as a risk. This highlights an opportunity to strengthen proactive detection.

ENVIRONMENTAL RISKS ARE PRESENT BUT NOT DOMINANT

- > Environmental issues represent 3.4 per cent of all risks.
- > This indicates environmental exposure is present but secondary, relative to labour-related risks in this dataset.

Environmental risks exist within the known supply chain but are materially outweighed by labour rights and working conditions risks.



Actions and remediation

Our combined work focuses on the victims of modern slavery. Efforts to increase our supply chain transparency allow for targeted actions with the goal of addressing core issues, uplifting practices, and remediating any victims of modern slavery wherever possible. Our insights will be shared with relevant affiliates so that there is a feedback loop to utilise and take actionable steps.

Engagement with work sites, typically via our affiliates, takes time, and includes remediation, where appropriate. Risk and Violation identification, worksite engagement, relationship building, capability uplift, remediation, and auditing/monitoring typically takes one or more years to complete.

The majority of work sites assessed can be categorised as under active engagement. This includes engagement with affiliates or their representatives on potential or actual issues, and/or undertaking specific remediation.

Suspension of remediation status occurs when a potential issue is found to have insufficient evidence at this time, or that evidence is old information.

'Unknown' status is where there is insufficient information to establish the remediation status of a work site. This can also be a result of timing, such as when an initial engagement has occurred but no specific work site action has been taken yet.

WORK SITE REMEDIATION STATUS	WORK SITES ASSESSED	% OF WORK SITES ASSESSED
Active engagement	17	68
Suspended	7	28
Unknown	1	4

Work on building a group-wide remediation framework was paused late in 2025 to align with the development of an academic-led remediation framework. All current remediation work continues with the assistance of our affiliates. Work is in progress with the Faculty of Business and Economics in order to continue and complete our remediation framework.

MANAGING SUPPLIERS

To support our global research and education operations, Monash engages with a wide variety of suppliers. These vary from common goods and services to highly specialised suppliers worldwide that support Monash's leading research projects.

Our supply chain is highly varied and includes labour and products which may have a long supply chain. Some of our suppliers may outsource labour, and this outsourcing may have multiple levels.

For products, a typically long supply chain traces from mines to refining and manufacturing, and may include assembly. For textiles, the supply chain traces from seed or raw chemicals through processing and manufacturing.

As part of our targeted approach, the University may stipulate terms that eliminate higher-risk supply chain structures. One example is cleaning services, known to have very high-risk in outsourcing via subcontracting. In this instance, the University has prohibited cleaning services outsourcing by our primary provider, except for specific aspects of the service that may be reasonably outsourced to a specialist provider, such as pest control services.

A multifaceted approach is taken to understand the risk within our supply chain, as the supply chain is an integrated component that supports the University's ability to operate:

1. Analysis of detailed purchase order and credit card data for the reporting year to understand our spend.
2. Assessment to identify known high-risk products, services, industries and countries.
3. Processes, procedures, contract and tender templates are regularly reviewed and updated.
4. Behavioural and human practices are considered. Behavioural practices may be influenced by changes in the market, budgets and internal rules or events. Our approach includes observed and likely practices, both of which are viewed in light of influencing factors: internal (University) and external (e.g. supply chain, industry and competitors).

PROCUREMENT

Staff involved in the procurement of goods and services remain at the front line of our efforts to reduce the risk of modern slavery in our supply chain.

TRAINING AND AWARENESS

- > Staff new to procurement roles are identified and scheduled for modern slavery training. This applies to Monash University Australia, Monash College, Monash University Malaysia, Monash University Indonesia and the World Mosquito Program. Completion is mandatory (and reported in KPI section on page 59).
- > All new University staff are enrolled in modern slavery training and completion is monitored.
- > The University's Modern Slavery website, operated by Strategic Procurement, is updated and maintained.

PROCUREMENT PROCESS

- > In 2025, 1374 new suppliers were required to confirm their compliance with modern slavery obligations prior to becoming a supplier to the University.
- > We continue to benefit from our work with Electronics Watch, with an ongoing improvement in transparency for our Information Technology electronics supply chain. Where appropriate, the University continues to pre-check new material Information Technology purchases with Electronics Watch to support our decision-making during tenders.
- > The apparel panel members completed their Modern Slavery Capability Uplift programs successfully.

PURCHASE ORDER TERMS UPDATE

The purchase order process forms part of an integrated procurement approach to risk reduction, identification and mitigation. It is particularly useful when purchases are made where there is not a negotiated contract in place, at which time the purchase order terms typically apply. This year the standard purchase order terms and conditions for Monash University Australia were updated and published to include a more robust approach to modern slavery, mandating:

- I. Compliance with all applicable laws, statutes, regulations, and codes including but not limited to the *Modern Slavery Act 2018* (Cth).
- II. The requirement for a supplier to notify the University if they become aware of any instances or practices of modern slavery in its operations or supply chains.
- III. The requirement for suppliers to take all reasonable steps to address and remediate any offending practices.

This applies to all relevant purchases made after 1 September 2025, when the purchase order terms were updated.

A failure to comply with the purchase order modern slavery provisions may result in suspension or termination of the order with immediate effect. The University is also able to provide supplied information as required by law, and to any third-party who is assisting the University with internal compliance in relation to modern slavery.

The identification of modern slavery practices by suppliers in their operations or supply chains presents an opportunity for practices to be improved, victims to be identified and remediated, and for substandard practices to end.

The University does not automatically exclude dealing with suppliers where issues are found, and instead takes a considered approach in each instance, with a primary focus on the wellbeing of the victims and what is being done to address and remediate the issues.

Case study 1: Cleaning services

The University's Buildings and Property division has now completed two years operating the new cleaning services contract following a comprehensive tender designed to improve transparency and reduce modern slavery risks. There has been an improvement in service and pricing transparency and a marked reduction in modern slavery risk.

A key goal during the tender for cleaning services for our Australian locations was to increase transparency of cleaning services and to reduce modern slavery risk in this known high-risk area. The University's cleaning services are large, complex and cover multiple sites.

The new approach specifically addressed modern slavery risk – including introducing the use of open-book pricing to ensure that price buildup was clear – and that the supplier could run their business with reasonable profit margins and without undue pressures to cut corners. On top of pricing, a scope of work template detailing the cleaning requirements in significant detail and scale was created. This included locations, surface types, size of the area, services required, frequency and other specific data enabling suppliers to provide accurate pricing.

To facilitate accurate pricing, the University provided a template spreadsheet which encompassed the entire service. This spreadsheet also considered labour types, labour rates, and overtime requirements. In addition, productivity levels were factored in, based on advice from the [Cleaning Accountability Framework](#), to ensure cleaning staff were not placed under unreasonable workload.

In providing the template spreadsheet, the University was able to produce a transparent service definition which was able to be more easily compared across tender respondents. It provided a clear framework for fair and transparent business practice by both parties. Furthermore the clarity of services facilitated ongoing management of services and costs, including modifications and reactive services.

This new approach has resulted in:

- > An increase in confidence that modern slavery risk is understood and managed and cleaning staff have reduced risk in their employment.
- > Transparency of services and cost to provide services
- > A reduction of modern slavery risks as a result of the tender process. The modern-slavery focussed approach to the tender resulted in detailed information from open-book price and resource planning. The parties were both able to use the information to ensure services are delivered within defined productivity maximums and using a transparent staffing pool.

The relationship with the supplier is now one of a partnership, built on trust and collaboration. Shared documents are now used to monitor and model services.

To ensure ongoing service quality and safety, a multitude of audits are now utilised for both parties to more rapidly identify and address issues. Audits are undertaken by staff and checked by supervisors.

The following monthly internal audit structure is in place for the parties to rapidly recognise and respond to issues:

- > 40 quality audits
- > 10 OHS safety audits
- > 8 waste audits

The University has a balanced and partnering approach, for example if the supplier proposes fewer cleaning staff for a role than Monash knows is needed, the University points this out, and requests and pays for additional staff to ensure the workloads placed on cleaning staff were reasonable.

These benefits were also balanced by some unexpected outcomes:

- > Approximately 50 per cent of previous cleaning staff at one site resigned due to overtime limits placed in the new contract. These limits were included to protect staff from what the University would consider unreasonable overtime work. Our lesson is not to assume that staff are unwilling to work considerable overtime – beyond what we may consider the norm. More work is needed in this area, as it demonstrates that in running the tender there was a lack of understanding of the existing cleaners and what they seek in their role. The contractually required limit of overtime with the new cleaning provider resulted in a reduction in income for many workers.
- > It was identified that a range of services in addition to the core cleaning services were being provided to various areas in the University. In working with these areas over time, cleaning staff assisted with various requests that were not logged as work orders and thus not visible to the University's central cleaning management team. Upon reviewing the uncontracted work, some requests were identified as out of scope for normal cleaning services and some also were unsuitable for cleaning staff to complete, requiring more robust solutions. As the new contract was limited to formal, contracted work, work practices were put in place to limit cleaning to contracted work plus pre-approved reactive work orders. The commencement of the new supplier immediately led to the cessation of any off-contract work and brought this issue to light.

The University continues to work closely with its supplier to refine its approach to cleaning services.

Case study update 2: Apparel

The University's apparel uplift program saw the successful assessment and uplift of a number of apparel suppliers after they completed a modern slavery questionnaire. The method used to engage the suppliers was to highlight the benefit to their business if they have up-to-date knowledge and a cohesive approach to modern slavery in their business and are able to describe it – and how doing so may positively influence any tenders the suppliers may bid on. This was well received.

The suppliers, prior to engagement, varied from best-in-class approaches to modern slavery with 20 years experience to very small businesses with limited resources and knowledge. Our method was specifically designed to be able to support suppliers with zero knowledge of modern slavery.

Supplier responses were received and then used to identify existing knowledge and work, and opportunities for improvement. Identified improvement opportunities were captured for each supplier in a capability uplift plan with supplier deliverables.

The capability uplift plans were each agreed to in writing by the suppliers. These were not intended to be legally binding by design – to avoid the need for complex commercial discussions of valid contracts. However all suppliers are aware that the University may alter its ordering practices based on the program participation and outcome.

In 2025 the University reviewed all supplier responses:

- > Positive feedback was received from all suppliers that participated in the program.
- > The program documentation (excluding supplier information) was shared with the AUPN to promote the consideration of similar apparel programs through the sector.
- > All suppliers met or exceeded their required deliverables. One supplier went further than requested and their capability uplift work had resulted in a discovery exercise that improved their depth of understanding and approach to modern slavery.

Apparel supplier capability plan improvements included:

- > Identify key staff, train them in modern slavery, and keep records of training.
- > Identify and put in place methods to increase supply chain visibility.
- > Increase their awareness that their supply chain likely has low-skilled and/or migrant workers in it, when they had suggested there were no such workers in their supply chain.
- > Change approach so instead of immediately dropping supply chains of concern, they first see if they can help the plight of the victims, as ceasing business may harm them further.
- > Implementing a process and practice to audit supply chains, including using a third party to do so if needed.
- > Implement a self-audit of their modern slavery program and adjust the program accordingly – continuous improvement.
- > Ensure a single role or person within the company is identified as having clear accountability for modern slavery.
- > Create a page or section of their website to clearly highlight their stance on modern slavery.

RISKS – CAUSE, CONTRIBUTE OR DIRECTLY LINKED*

Risks have been identified including whether they cause, contribute, or are directly linked to, modern slavery risk and events. This has enabled us to better understand our impact and ways to minimise and address it.

CONTRIBUTE – OUR BUSINESS CONTRIBUTES TO AN ADVERSE IMPACT

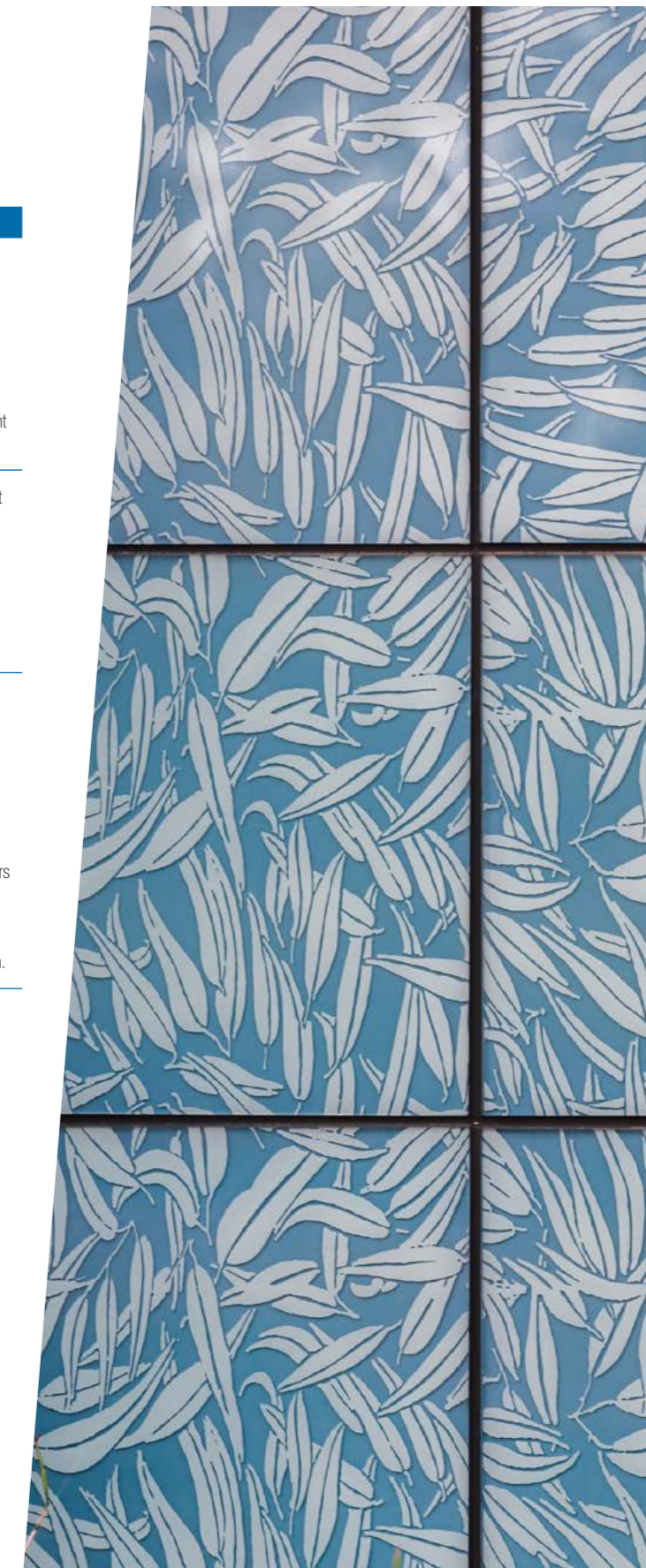
Operations

AREA	RISK	ACTIONS
Procurement and management EDUCATION RESEARCH CAMPUSES ALL ENTITIES	Set unreasonable price expectations and/or timeframes on tenders or orders. Alternate suppliers may be utilised, or pressure passed down the supply chain leading to poor practices.	> Mandatory modern slavery training module for all new staff, and a 100 per cent completion key performance indicator (KPI) annually for all staff involved with purchasing, legal or commercial matters, in addition to all senior staff. > Raise awareness that time and price demands both may increase risks, if unreasonable.
Procurement – general EDUCATION RESEARCH CAMPUSES ALL ENTITIES	Purchase from industries known to be high-risk without due consideration. That includes identifying the nature of the risk, how the university may minimise or eliminate it, including via commercial and procurement methods. When demands are made on a market that include unreasonable timeframes and/or cost and if market responses are acted upon, signals are sent to the market that modern slavery is not of primary concern. This may include items purchased for education and research activities both onshore and offshore.	> Mandatory training – 100 per cent KPI (reached). > Annual refresh of modern slavery high-risk countries, industries and products/services. > Supplier onboarding modern slavery gate with manual management if the supplier does not pass the gate – KPI measured. > Procurement analytics down to line-item level on orders to capture all spend in detail for risk-based reporting. > Identifying and targeting high-risk purchases including specific risk reduction actions via our modern slavery program. > Tender templates have a Responsible Procurement section – must be completed and approved at both the planning and outcome stage. > Standardised approach to modern slavery clauses. > Bespoke management of known high-risk large projects/contracts. > Update of Purchase Order Terms.
Management and specifications EDUCATION RESEARCH CAMPUSES ALL ENTITIES	Place undue pressure on suppliers to perform at levels not reasonably achievable, or in a way that puts at risk reasonable business profit. The supplier receives a signal that performance and cost are the only, or most, important factors in retaining or growing the business. The supplier may react by trying standard practices to keep their business afloat.	> Increased transparency in commercial dealings, such as a completely transparent shared model for managing high-risk cleaning services. > Security and plumbing services have also been addressed in a similar manner. > Specific mention of this topic within modern slavery training, which is mandatory for procurement staff and senior executives.
Staff employment EDUCATION RESEARCH CAMPUSES ALL ENTITIES	Staff are subject to work pressures and there is the potential for a power imbalance to exist with managements, which can lead to outcomes detrimental to the staff member.	> The University has a comprehensive set of policies and processes that cover treatment of staff and behaviours of all those on campus. > There are a multitude of accessible complaint avenues, including anonymous ones, and those protected by whistleblower laws. > Staff are engaged by robust workplace agreements. > Training in identifying and preventing bullying and harassment, diversity and inclusion, and many other related topics is mandatory for all staff.

* UN Guiding Principles on Business and Human Rights Accessed 8 February 2025

Supply chain

AREA	RISK	ACTIONS
Recruitment EDUCATION SOME ENTITIES	The University uses recruiters to identify potential students from around the world.	> Use of known, quality recruiters > Knowledge sharing across Australian universities or observed recruitment practices. > Monitoring and assessment of recruiters. > Ongoing development and deployment of student services programs.
Investments \$	Appointing investment managers with insufficient modern slavery knowledge to meet the University's requirements.	> Formal annual reporting by investment managers on their work in modern slavery. > Limit investment types to avoid investments not aligned with the requirements of the University. > Seek reasonable returns.
SUPPLY CHAIN Subcontracting EDUCATION RESEARCH CAMPUSES ALL ENTITIES	Put in place or otherwise enable uncontrolled or non-visible subcontracting, including multi-level subcontracting. The lack of visibility increases the potential for modern slavery practices. Subcontracting includes multiple profit-takers and may put pressure on those producing the goods or performing the service.	> As standard practice, subcontracting is generally limited to a case-by-case basis. > Tender documents seek information about intended subcontracting, and responses are reviewed. > Standard practice in contract review and negotiation requires subcontractors to comply with Monash policies and requirements against modern slavery and to flow down such obligations to any party they further subcontract with.



DIRECTLY LINKED – OUR IMPACT IS DIRECTLY LINKED TO OUR OPERATIONS, PRODUCTS OR SERVICES BY OUR BUSINESS RELATIONSHIP WITH ANOTHER ENTITY

Supply chain

AREA	RISK	ACTIONS
Procurement – electronics EDUCATION RESEARCH CAMPUSES ALL ENTITIES	The electronics supply chain is long and often opaque. It reaches all the way back to mining, often with known areas of concern such as cobalt mining by children. Many tiers of the supply chain are known to be high-risk globally as raw materials are refined, components are manufactured, assembled into parts, and parts assembled into devices. This may occur even when best-in-class electronics are purchased.	<ul style="list-style-type: none"> > Ongoing work with Electronics Watch to pre-assess and monitor material electronics purchases. This also applies to Standard Operating Environment (SOE) models which are widely used. > A supplier with known modern slavery issues in their supply chain may be excluded from a tender, and their ongoing lack of addressing the issues highlighted as the cause of their exclusion. This sends a clear message back to the supplier and the wider market that they must work on resolving known modern slavery issues in their supply chain in a reasonable manner or their business will be affected. > Specification change – where an industry or product is known to be very high-risk and hard to mitigate, we may alter the early specification so the high-risk product or industry is not part of the design solution. > Price increases sought by suppliers should be carefully reviewed to ensure price movements reasonably reflect changes in the market and wider economic conditions.
Procurement – construction CAMPUSES	Materials may have opaque offshore supply chains and come from high-risk countries. Labour may have a degree of subcontracting as standard business practice.	<ul style="list-style-type: none"> > The University utilises quality construction partners, and identifies areas of concerns before setting terms to reduce the risks via tenders and contracts. This includes reviewing suppliers' documentation on their internal processes and procedures to ensure they are adequate.
Procurement – solar CAMPUSES	Solar panels are at high-risk globally. While the University has completed most of its planned material solar deployment, it is foreseeable that solar panels may be required in the future.	<ul style="list-style-type: none"> > Consider specification changes early in the project to utilise an alternate technology. > In the event of material solar purchases, consider a market assessment to identify new suppliers that have more transparent and safer solar supply chains. Also provide feedback to solar panel sources of concern.
Procurement – apparel ALL ENTITIES	Apparel is a high-risk industry, and the University has decentralised apparel purchasing. An assessment has highlighted a variety of apparel purchasing approaches from mature to buying based on price. This may cause, contribute to or indirectly impact the risk.	<ul style="list-style-type: none"> > Identification of all apparel purchases and who buys them. > Assessment of several apparel suppliers and formation of supplier improvement plans for each. > Completion of the first apparel panel with approved suppliers.
Recruiting CAMPUSES	The global recruiting industry for students is known to be reasonably high-risk. This may include coercion and the use of guilt-driven debt bondage associated with "gifts" such as electronic devices given to prospective students – the student feels pressured to proceed.	<ul style="list-style-type: none"> > Careful assessment of all recruiters and their practices. > Use of agreements with suitable terms and conditions preventing such practices and enforcement of the terms of the agreement against recruiters to rectify any breaches. > Shared information across the higher education sector to identify credible recruiters. > Proceed with additional caution if the global student market undergoes material change.
Events EDUCATION RESEARCH CAMPUSES ALL ENTITIES	The University operates many events each year. These may include the requirement for a strict readiness timeframe and the use of labour hire to set up and run events. This may create pressure on our suppliers or their staff even with careful forward planning. For example, there may be a need to minimise disruption to campus operation – which may reduce available setup time.	<ul style="list-style-type: none"> > Careful planning and using proven methods, suppliers and timeframes. > Robust contracts including labour obligations. > The use of known and quality suppliers. > The establishment of long-term and closer business relationships to minimise short-term thinking by suppliers.

KEY HIGH-RISK CATEGORIES AND RISK REDUCTION

HIGH-RISK CATEGORY	% OF HIGH-RISK SPEND	RISK REDUCTION IN PLACE
INFORMATION TECHNOLOGY NETWORKS	38.3%	Electronics Watch affiliation and electronics-specific clauses. Pre-purchase assessments where possible.
CLEANING	21.9%	Cleaning contract with full transparency of services.
SECURITY AND PARKING	14.5%	A security contract with full transparency of services.
DESKTOP HARDWARE	11.2%	Electronics Watch affiliation and electronics-specific clauses. Pre-purchase assessments where possible.
CATERING	11.2%	Mandatory adherence to labour laws in contracts.
DESKTOP ACCESSORIES	1.3%	Electronics Watch affiliation and electronics-specific clauses. Pre-purchase assessments where possible.
SAFETY SUPPLIES	0.7%	Not yet addressed.
MOBILE DEVICES AND ACCESSORIES	0.5%	Electronics Watch affiliation and electronics-specific clauses. Pre-purchase assessments where possible.
TELECOMMUNICATIONS EQUIPMENT	0.2%	Electronics Watch affiliation and electronics-specific clauses. Pre-purchase assessments where possible.
STAFF SUPPLIES	0.2%	Not yet addressed.

In some tables, electronics-related categories are grouped under 'Electronics' – in this table they are broken out into sub-groups of electronics.



ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

KEY PERFORMANCE INDICATORS

Annual key performance indicators (KPIs) are used to measure progress and set targets. These may be adjusted over subsequent reporting periods in line with ensuring relevance and continuous improvement.

SUPPLIER ONBOARDING (MONASH AUSTRALIA)

KPI: Percentage of supplier compliance (excluding credit card, one-time and low-value suppliers).

Target: 100%

Achieved: 100%

A total of 1374 new suppliers were onboarded through the gating process. A failure requires manual handling of the supplier's non-compliance with agreeing to modern slavery legal obligations. A review of the supplier gate failure must occur before a supplier can complete onboarding into our purchasing and payment systems.

Our KPI for onboarding suppliers through this gate is 100 per cent, and we reached our target of 100 per cent of these new suppliers being onboarded via the mandatory gate. By design, this process does not apply to all suppliers, as it excludes low-value suppliers, one-time suppliers, and credit card transactions.

TRAINING

KPI: Percentage of procurement, legal and executive staff completing training.

Target: 100%

Achieved: 100%

In 2025, 26 key staff (100 per cent KPI reached) and 2556 other staff completed modern slavery training.

Reporting year | Completed

2022 | 5162

2023 | 3761

2024 | 4626

2025 | 2582

Total: 16,131

MODERN SLAVERY REPORTING BY FUND MANAGERS

KPI: Percentage of fund managers providing annual update on their modern slavery report.

Target: 100%

Achieved: 100%

Monash University's fund managers are required to report annually to the University, including a mandatory update of modern slavery-related actions taken over the past 12 months. All submitted modern slavery reports were assessed and met the required level of detail. Each report outlined appropriate measures, such as supplier risk assessments, investment risk evaluations, and staff training initiatives. The reporting on modern slavery progress by fund managers has achieved a 100 per cent KPI compliance.

UPDATE OFFSHORE PARTNERS REVIEW PROCESS (MONASH COLLEGE)

The update offshore partners review process occurs for new partners who were onboarded to the College in the year prior to the reporting period. No partners were introduced in 2024 therefore no partner reviews were required in 2025. As part of the onboarding process appropriate modern slavery clauses are included in each agreement.



COMPLIANCE MONITORING

Annual Compliance audit: Contract terms

Target: 100% of agreements reviewed have suitable contract terms for modern slavery

Achieved: 100%

The University's Strategic Procurement team undertook a compliance audit of a number of contracts of different types. After past audits, we identified an array of methods by which a valid contract can be created, with variation across entities. Within each entity, there are contract types that are more frequently used than others.

EXPANSION OF AUDIT SCOPE

We continue to evolve our approach to auditing entities and their contracts. The scope of global auditing has grown and it has been identified as a complex task. This area is not yet understood in sufficient detail to ensure comprehensive auditing. Further work is needed, and our audit scope and methods will develop from our key learning over time.

This year we completed audits of 17 documents, and expanded our scope to include our first offshore entity audits, template contract reviews, and offshore employment contract reviews. Ensuring the use of the proper templates enables us to address key early risk sources – it reduces the chance that an incorrect or out-of-date contract template inadvertently leads to multiple contracts being executed with incorrect terms.

Our complex structure and contract methods require additional compliance monitoring. This includes revising templates, introducing new contract types, and understanding various contract generation workflows.

A review of legal support showed significant variation: some entities use in-house legal support and adapted templates, while others rely on external, or international counsel for unique agreements. To ensure alignment and eliminate gaps across all entities, we will continue to expand auditing as required.

REQUIREMENTS TO PASS A CONTRACT AUDIT

Our primary auditing goal is to ensure that the audited artefacts reflect the various standardised approaches in place to manage the modern slavery terms in contracts. To be compliant, a contract or template must meet each of the following criteria:

1. Contain the correct standard terms according to the category of modern slavery risk:
 - a. low risk
 - b. high-risk
 - c. electronics high-risk
 - d. for HR agreements, clarity of the applicable labour laws, key pay and work obligations, labour rights, standard hours, management of any overtime, and also the document is provided in the local language.
2. Contain reference to the Modern Slavery Act 2018 (Cth) where appropriate.
3. Only approved bespoke terms – negotiated on a case-by-case basis. No bespoke terms were utilised in 2025.
4. For employment-related documents, include being written in the local language where appropriate.
5. For employment-related documents, include clearly stated pay method and frequency – and clearly state key employer and employee obligations.
6. For employment-related documents, clearly cover standard work days and hours, pay and overtime rules and any applicable overtime pay rates and how they are applied.
7. May include a contract variation to an existing agreement, in which case the verified agreement terms will be uplifted via the variation to comply with this audit section. No such variations occurred in 2025, and these are expected to become less frequent as older agreements come to an end, or are entirely replaced with agreements based on the latest templates.

ENTITY	AGREEMENT TYPE	MET MODERN SLAVERY CONTRACT AUDIT REQUIREMENTS
MUA (including Monash College)	Information Technology Security	Yes
	Information Technology Hardware Lifecycle	Yes
	Information Technology Consulting	Yes
	Managed Services / Buildings & Property	Yes
	Contractor / Strategic Procurement	Yes
	Master Goods and Services / Strategic Procurement	Yes
Monash University, Indonesia	Employment - senior role	Yes
	Employment - senior role	Yes
	Employment - junior staff	Yes
	Employment - junior staff	Yes
Monash University, Malaysia	Goods contract - template	Yes
	Master Services Agreement - template	Yes
World Mosquito Program	Design & maintenance	Yes
	International marketing	Yes
	Digital publishing	Yes
	Medical Services	Yes
	Projects including scheduling, small facilities	Yes

AUDIT OUTCOME

The contract audit result was 100% and thus successful, however it has been identified the audit scope must increase further. The contract audit will be scheduled to increase in scope over time. There may still be unknown elements yet to be identified.

Continuous improvement opportunities:

1. As high-risk contracts are the most important, ensure all audit samples include a reasonable proportion of high-risk contracts per procurement group, rather than including an entirely random sample of contracts.
2. Over time expand the type of agreements, the legal source of the agreements, and include relevant templates across entities to develop a broader audit coverage.

ASSESSING EFFECTIVENESS OF OUR ACTIONS

- GOALS AND OBJECTIVES

GOAL	WHAT WE DID	OUTCOME
Contribute to the higher education sector		
Contribute to the Australia/New Zealand higher education sector approach to modern slavery.	Active participation in the AUPN Modern Slavery Working Group, including conducting a presentation and assisting specific universities. The AUPN now includes a number of universities in New Zealand.	Provision of a set of apparel-related documents to the AUPN to facilitate sharing. Supporting the efficient creation of pre-qualified apparel panels at other universities.
Academic contributions		
Use academic expertise to assist in uplift Modern Slavery Act reporting quality.	Monash Business School Modern Slavery Research updated their Disclosure Quality Report. The program also identified two upcoming academic pieces of work from the Monash Business School for assessment for future use.	Feedback received last year has been included in the 2025 report. Program timing for the remediation plan will be adjusted to allow us to make use of the academic work released late in 2025.
Awareness and training of staff		
Increase modern slavery training and awareness.	Targeted training for key staff and assignment of training to all new staff. Reached 100 per cent for our KPI related to training of key staff.	In 2025, 2582 staff completed modern slavery training, bringing our total staff trained to 16,131. To date, approximately 100 procurement, contract-related and legal staff have received live training in dealing with modern slavery in contracts.
Increase staff, student and external audience awareness of both modern slavery and our Modern Slavery Act Report.	A coordinated communications campaign timed with our 2024 report being published.	In 2025 we communicated to staff using internal communications channels, and to our external audiences using our University-wide channels including social media.
Supply chain risk reduction		
Apparel panel formed and Apparel Capability Uplift Program completed.	Sent questionnaires, assessed results, created corresponding Apparel Capability Uplift Programs for each supplier, received supplier deliverables against their program and assessed them.	A material uplift in supply knowledge and approach across a number of areas. Whilst one supplier marked 'not applicable (NA)' to many questions, upon further discussion their view of their supply chain and its risk matured markedly. All suppliers met or exceeded their Apparel Capability Uplift Program deliverables. Positive feedback was received from all suppliers.



THE PROCESS OF CONSULTATION WITH CONTROLLED ENTITIES

PROCUREMENT

The Strategic Procurement team manages University-wide procurement policy and procedure. Strategic Procurement leads the modern slavery reduction program for all in-scope entities and the preparation of the Modern Slavery Act Report for Monash University. The team also provides subject matter expertise for all modern slavery-related issues across the University and its entities. Each onboarded entity has been engaged directly to understand its practices, its procurement, and to assist with their compliance. Strategic Procurement is responsible for coordinating all procurement activity across the University, implementing procurement policy and procedures, and providing category management for strategic categories across the University.

Strategic Procurement also provides strategic sourcing support across the University, as well as expert support, advice and tools to all procurement specialists. Procurement specialists are in business portfolios for specialist procurement categories (such as Buildings and Property and eSolutions) and are responsible for the procurement and contract management of specified categories. Monash College, Monash University, Indonesia, and Monash University, Malaysia have their own procurement functions that are aligned with the procurement policy and procedure.

Monash College, Monash University, Malaysia, Monash University, Indonesia, and World Mosquito Program representatives are part of both the Modern Slavery Steering Committee and the Modern Slavery Working Group. Throughout the reporting year controlled entity staff were engaged as required to better understand their research, education and operations as they relate to modern slavery.

The Monash University Foundation Trust is managed within the portfolio of the Chief Financial Officer and Senior Vice-President. The Foundation operates within Monash University's Australian purchasing processes and has representation on the Modern Slavery Steering Committee.

OPERATIONS

Reporting is structured to enable Monash University, the parent entity, to be aware of all situations of operational concern and key decisions for all controlled entities.

CONSULTATION AND ONBOARDING OF ENTITIES

The following key steps are undertaken for onboarding new entities. The first entity to commence onboarding was Monash College, followed by Monash University Malaysia, Monash University Indonesia, and the World Mosquito Program.

SUPPLY CHAIN RISK ASSESSMENT

The preparation and inclusion of the entity's available procurement data into our database. An assessment of the entity's specific risks within their home country as identified by the latest Global Slavery Index report.

Additional consultation specific to the entity, including:

- > The identification of the specific risks and concerns the entity may have.
- > Understanding the operations and supply chains the entity has in place.
- > The identification of template contracts, processes, procedures, and any sourcing documents that may need to be reviewed, including any that may be in foreign languages.
- > Relevant legal nuances (for offshore entities), including any existing modern slavery-related legal obligations that apply in their country. In addition, understanding who the entity receives their legal support from.
- > Planning and socialisation of timing, expectations and outcomes – these are updated in conjunction with the entity representatives.
- > Subsequent phased introduction of the modern slavery program of work for that entity, followed by the commencement of a more detailed inclusion in the next annual Modern Slavery Act Report.

The degree to which these steps apply may vary. Reasons for this may include the provision of certain services by Monash University (the parent entity) to some related entities and variations in data availability. This may vary from entity to entity.

TRAINING

Key staff are identified and enrolled in the online modern slavery training module. Completion of training by key staff is monitored. Training deployment across entities is coordinated with the assistance of Monash HR's Learning and Development team.

ASSESSMENT OF OFFSHORE ENTITIES

We continue to build a more comprehensive understanding of the risks facing our offshore entities and their existing operating methods. This allows us to identify in detail if any entities have areas in need of uplift. The areas assessed include offshore entities that utilise either Monash University Australia, their own or external policies, processes, legal support and contract templates. In the event they utilise their own templates or lawyers, we determine that a check is required to ensure they meet program requirements. This will typically include the need to schedule new contract arrangements for future compliance checks. In 2025, several of these new arrangements had been identified.

Our contract audit in 2025 expanded into our offshore entities including Monash University, Indonesia and Monash University, Malaysia. As an example, four employment contracts were audited to identify if there was the potential for deficiencies from a modern slavery perspective. This employment-related test sample was checked for the first time, as employment contracts may be misused or abused and hence may increase the risk of modern slavery. All the test sample employment agreements reviewed were compliant, and key employee and employer rights and obligations were clearly identified in a document that was written in both English and in the local language.

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