

Australian Catholic University

2024 Modern Slavery Statement

1 January – 31 December 2024

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Disclosure note

This statement has been made on behalf of Australian Catholic University.

This statement covers all entities owned or controlled by ACU.

ABN 15 050 192 660

Head office address: 40 Edward Street, North Sydney NSW

www.acu.edu.au

Statement from Vice-Chancellor and President Professor Zlatko Skrbis

ACU is pleased to submit its fifth annual Modern Slavery Statement to the Australian Government as part of the 2024 Australian Catholic Antislavery Network (ACAN) Compendium of Modern Slavery Statements. This statement highlights ACU's anti-slavery efforts across the organisation. We have strengthened our risk management processes, due diligence on suppliers and business partners, and considered modern slavery risks in our investment portfolio.

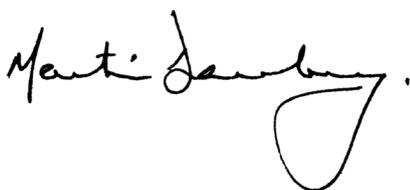
I commend the efforts of ACU's modern slavery working group on their actions to address and continuously improve ACU's response. I am also pleased to have continued to serve on the Advisory Committee of the Domus 8.7 Modern Slavery Remediation Service during the reporting period.

Statement, approval and signature from Chancellor The Honourable Martin Daubney AM KC

As a Catholic university, we remain committed to upholding the dignity of every individual and community with any connection to ACU's supply chain and operations. Our commitment to transparent, accountable and responsible business practices is a powerful example to our students – the leaders and change-makers of tomorrow. Through our actions, we aim to instil in them the importance of ethical conduct, social responsibility, and the profound impact that they can have on the world.

On behalf of the ACU Senate and Advisory Committee, I approve this Modern Slavery Statement to the Australian Government and renew ACU's commitment to take an active role in eliminating modern slavery from the world.

This Modern Slavery Statement was approved by the principal governing body of Australian Catholic University as defined by the *Modern Slavery Act 2018 (Cth)* ("the Act") on 19 June 2025. This Modern Slavery Statement is signed by a responsible member of Australian Catholic University as defined by the Act.



The Honourable
Martin Daubney AM KC
Chancellor
Signed: 19 June 2025



Professor Zlatko Skrbis
Vice Chancellor and President
Signed: 19 June 2025

Criterion 1: About Australian Catholic University (ACU)

An ACU education is grounded in the Catholic understanding of faith and reason working together in the pursuit of knowledge, promotion of human dignity, and advancement of the common good.

We aim to transform lives and communities. Students are challenged to look beyond the classroom, solve real-world problems, develop their own search for meaning and cultivate strong professional ethics. They are invited to stand up for people in need and causes that matter.

Opportunities for personal and professional growth are critical to ACU. This is a university of service – so much so that it is built into the curricula. All ACU courses offer work placements, internships or volunteering opportunities.

High-impact research – with social, cultural and economic benefits – is core to our institution. Our research and enterprise activities develop innovative solutions to issues impacting human dignity and the common good. Through ethically informed research we deliver positive change across ACU, industry, community and government.

We foster academic collaboration and engage with local and international partners to enable the exchange of knowledge and skills and develop dynamic educational and research initiatives. We build healthy social partnerships, assisting communities in actively shaping initiatives that directly impact them.

ACU is a university for everyone. Like all Catholic institutions, the university is inclusive and supportive of everyone, every day – regardless of their faith, tradition or circumstance.

ACU is a young university making a significant impact. Ranked in the top 10 Catholic universities*, we're also a leader in employability with 95 per cent of our graduates employed**. The university has seven campuses around Australia, a campus in Rome, Italy, and an online campus – ACU Online.

ACU's 2024 annual consolidated revenue is \$653,085,000.

* Based on International Federation of Catholic Universities members ranked on *Times Higher Education* World University Rankings 2025

** Graduate Outcomes Survey – Longitudinal 2023, overall employment for domestic undergraduate students and domestic postgraduate coursework students



ACU mission

Within the Catholic intellectual tradition and acting in truth and love, Australian Catholic University is committed to the pursuit of knowledge, the dignity of the human person and the common good.

Our values

Truth

ACU is a place where faith and reason are explored in search of truth.

Excellence

The pursuit of excellence underpins our efforts in teaching, research and engagement.

Service

ACU is a university of service. We seek to improve the lives of others through compassion, empathy and respect.

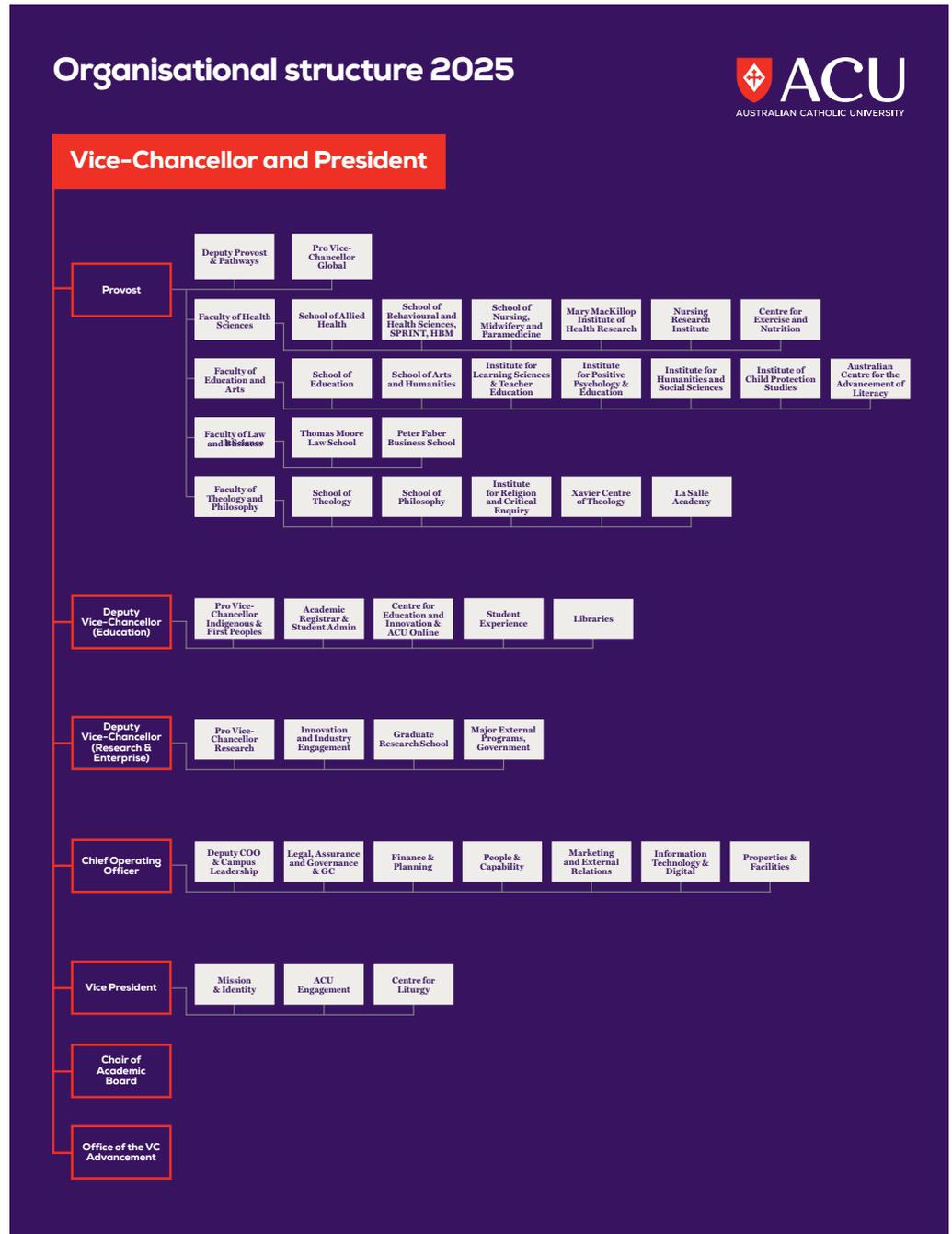
Our vision

Our vision is to enable flourishing lives, foster thriving communities and build an ethical future.

Criterion 2: ACU's structure, operations and supply chains

Our structure

This diagram represents ACU's organisational structure at the end of 2024.



Our governance framework

ACU's anti-modern slavery initiatives have been incorporated into ACU's governance structure, requiring the approval of the Finance and Resources Committee and ACU's Senate. Our key leaders and governance bodies are as follows:

CHANCELLOR

ACU's Chancellor chairs the Senate, the chief governing authority of ACU.

PRO-CHANCELLOR

The Pro-Chancellor sits on the Senate, acts as deputy to the Chancellor, and chairs the Finance and Resources Committee.

CORPORATION

ACU is a public company. The Corporation, as enshrined in our constitution, is responsible for maintaining a university that adheres to the Catholic faith and is committed to the pursuit of truth through academic enquiry.

VICE-CHANCELLOR AND PRESIDENT

The Vice-Chancellor and President is the chief executive officer of ACU, representing the university both nationally and internationally, and providing strategic leadership and oversight of the operational management of the university.

PROVOST AND DEPUTY VICE-CHANCELLOR (ACADEMIC)

The Provost is responsible for the Academic Portfolio: ensuring academic quality is maintained, overseeing the faculties, and providing the operational delivery of ACU's academic programs.

VICE PRESIDENT

The Vice President is responsible for advancing the Catholic identity and mission of the university in ways that are pastoral and inclusive, thus reflecting the rich diversity of the ACU community. This portfolio includes the Directorate of Identity and Mission, Campus Ministry and ACU Engagement.

CHIEF OPERATING OFFICER

The Chief Operating Officer is responsible for the Corporate Services Portfolio. This portfolio covers a broad range of areas including properties and facilities, information technology and finance and planning.

DEPUTY VICE-CHANCELLOR (RESEARCH AND ENTERPRISE)

The Deputy Vice-Chancellor (Research and Enterprise) oversees ACU's research and innovation strategy, external engagement strategy and approaches to securing external research investment, advancing the university's reputation as a leading research institution with close links to industry and government. The role supports academic career development and works to create a culture of excellence and sustainable growth in research and enterprise.

DEPUTY VICE-CHANCELLOR (EDUCATION)

The Deputy Vice-Chancellor Education leads ACU's Education Portfolio, making a major contribution to the Catholic commitment to education, with responsibilities for the student experience and oversight of key directorates including Libraries, First Nations, Student Experience and the Centre for Education and Innovation.

SENATE

The Senate is ACU's chief governing authority. Its members' roles include managing the budget, creating policy, overseeing university operations, and ensuring adequate risk management procedures are implemented and followed. ACU's Chancellor and Pro-Chancellor head up our Senate and ensure ACU is governed in accordance with our constitution.

ACADEMIC BOARD

Our Academic Board reports to the Senate and is responsible for all academic matters, including conducting quality assurance, developing academic policy, recommending new courses to the Senate, and initiating course reviews.

SENATE AND BOARD ELECTIONS

Elections are held to appoint members to the Senate and Academic Board from the university's academic and professional staff, and student bodies.

STATE CHAPTERS

To connect ACU with local communities, ACU has State Chapters in the Australian Capital Territory, New South Wales, Queensland and Victoria. Chapters act as advisory bodies to Senate but have no direct governance role.

THE VICE-CHANCELLOR'S ADVISORY COMMITTEE

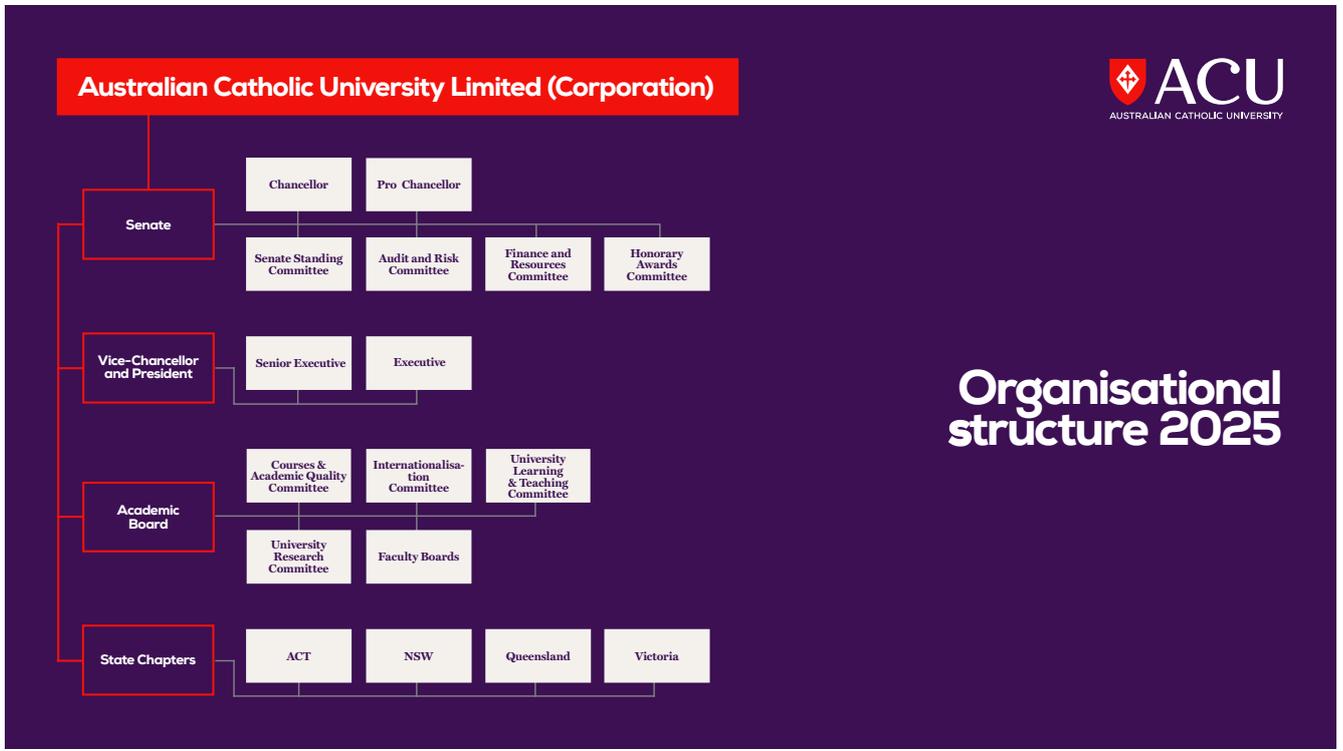
The Vice-Chancellor's Advisory Committee (VCAC) is the university's principal management committee. It is an advisory forum providing advice on matters of strategic importance to the Vice-Chancellor and President.

ERADICATING MODERN SLAVERY (EMS) WORKING GROUP

ACU's Eradicating Modern Slavery (EMS) Working Group is chaired by the Vice President and Director, Identity and Mission, and comprises members of the ACU senior executive, other key ACU personnel and ACAN Program Managers. It was established in 2020. Its remit is to look at further eradicating modern slavery and human trafficking risks in ACU's operations, policies, procedures, supply chains, business partnerships and employment, and to raise anti-slavery consciousness across the whole university. More detailed information about its role and objectives can be found under Criterion 4.

ACU's Governance Structure

Below is a visual representation of ACU's Governance Structure as of the end of 2024. ACU's Legal, Assurance and Governance Directorate maintains a suite of policies and procedures which relate to the conduct, decision making, risk management, internal organisation and management of the university.



Our operations

ACU is a publicly funded university with four primary faculties – education and arts, health sciences, law and business, and theology and philosophy – and a research and enterprise portfolio, an education portfolio, and a corporate services division, made up of directorates, including: Legal, Assurance and Governance; Properties and Facilities; People and Capability; Finance and Planning and Marketing and External Relations.

ACU has seven Australian campuses – Ballarat, Blacktown, Brisbane, Canberra, Melbourne, North Sydney and Strathfield – with one international campus in Rome, and a leadership centre in Townsville.

Some key information (2024):

- approximately 2,500 (FTE) staff
- approximately 35,000 students
- more than 140,000 alumni
- approximately 5,800 international students from 96 countries enrolled
- more than 200 international partners (includes PhD students and research arrangements) across six continents
- more than 1,300 ACU students who have studied at our Rome Campus.

NB: Some of this information is in a process of change or being updated. The year the data represents is indicated where applicable.



Our Strategic Plan – Vision 2033

ACU Vision 2033 sets the strategic direction for the university.

Modern slavery is identified as an important objective in ACU’s strategic planning, and is included under a number of focus areas in ACU’s Vision 2033.

Our vision

As a leading Catholic university, we will enable flourishing lives, foster thriving communities and forge an ethical future.



Flourishing lives

To flourish, individuals require intellectual growth, a sense of wellbeing and moral purpose. This enables them to find fulfilment in their personal and professional lives.



Thriving communities

Thriving communities are healthy, secure and inclusive. They nurture social connection and provide opportunities for all.



Ethical future

An ethical future is one that promotes human dignity and the common good above all other considerations.

Vision 2033’s focus areas guide us in achieving our ambitions and assist us in setting our operational objectives. The focus areas below are of specific relevance to ACU’s commitment to take steps to eradicate modern slavery.

FOCUS 1 - PROVIDE A LEARNING ENVIRONMENT THAT EMPHASISES GROWTH OF THE WHOLE PERSON

We will equip our learners with the knowledge, skills and confidence to thrive in an interconnected and changing world.

- 1.4 Foster a sense of global responsibility.

FOCUS 5 - PROMOTE HUMAN DIGNITY AND ADVANCE THE COMMON GOOD

We will fulfil our mission commitment to upholding the inherent worth of every individual and advocating for a just and harmonious world.

- 5.1 Strengthen our contribution to the Asia-Pacific region and beyond.
- 5.2 Form international collaborations to address global challenges.
- 5.3 Promote the importance of ethical practice in all aspects of life and work.
- 5.4 Critically evaluate the effects of global progress and change on individuals, communities and environments.

FOCUS 6 - STRENGTHEN OUR INSTITUTIONAL FOUNDATIONS

To facilitate the sustained success and growth of ACU, we will consistently work to strengthen our institutional foundations.

- 6.3 Demonstrate environmental, social and governance excellence.

Vision 2033 is a commitment to our mission, growth, innovation and sustainable success. Vision 2033 is designed to navigate the challenges of the future strategically whilst being highly responsive to contemporary needs, ensuring that we not only adapt but thrive and provide impactful contributions to the communities we serve.

Learn more about Vision 2033
vision2033.acu.edu.au

Criterion 3: Modern slavery risks in operations and supply chain

ACU regularly submits supplier and spend data to the risk assessment platforms undertaken on behalf of both the Australian Catholic Anti-Slavery Network (ACAN) and the Australasian Universities Procurement Network (AUPN).

These assessments present an overall picture of risk based on the types of goods and services being procured and the country of origin. Such assessments help ACU to focus attention on high risk activities.

Operational risks

Many key operational activities are carried out by Tier 1 suppliers (direct suppliers to ACU), with Tier 2 suppliers providing goods or services to those Tier 1 suppliers. This structure creates potential operational risks, particularly around the delivery and quality of services.

To manage these risks, ACU includes supplier risk categorisation and mitigation actions as part of our broader operational risk framework.

Beyond supplier-related risks, ACU also addresses operational risks by regularly reviewing and updating internal processes and practices to ensure they align with relevant compliance and operational requirements. For further details, refer to [ACU's 2024 Modern Slavery Maturity Assessment](#) (under Criterion 5).

ACU's commitment to eradicating modern slavery is evident in our inclusion of modern slavery considerations in our Operational Risk Registers. We also implement targeted control measures to ensure we meet all Australian federal and state anti-slavery reporting obligations.

PRODUCT AND RISK CATEGORISATION SYSTEMS AND SOFTWARE TOOLS

Both ACAN and the AUPN have developed risk categorisation systems based on various aspects of the supply chain, such as the type of goods or services, and where services are provided or made.

Further analysis is being undertaken to categorise risk for key areas of spend.

The purpose of the software tools can be broadly described as follows:

- to describe the product and risk categorisations
- to allocate specific suppliers to their respective product and risk categorisations, which may include the assignment of primary, secondary or other tier levels of risk

- to enable the collation of suppliers' information
- to enable suppliers to provide information directly to the tools via portal access
- to collate suppliers' actions
- to enable suppliers to provide a sector-wide response
- to be a single point of contact for all suppliers to avoid suppliers having to make multiple responses to different entities.

In January 2024, AUPN's University Anti-Slavery Program transitioned to the ArcBlue modern slavery risk software solution, to better support Australian and New Zealand universities in identifying supply chain risks and conducting supplier due diligence activity through its self-assessment questionnaire (SAQ) tool.

Additionally, 2024 marked the commencement of the implementation of Sievo across numerous Australian universities, including ACU. As a procurement analytics platform, Sievo enhances visibility into university purchasing patterns and standardises supplier data classification. This unified approach will strengthen risk assessments across university supply chains, enabling institutions to leverage their collective purchasing power more effectively. Since late 2024, ACU procurement staff have attended regular University Procurement Analytics Service Champions forums to learn about the platform's functionality and features; and to share ideas with other university members – in the lead up to full Sievo implementation.

The tools are invaluable in assisting with ongoing supplier risk assessment and actions required within supply chains, to help mitigate modern slavery activity.

Our supply chain

ACU's annual consolidated revenue in 2024 was \$653,085,000, with 69 per cent of this revenue derived from government grants.

We have more than 3,000 suppliers of goods and services in our supply chain. However, 232 of these suppliers represent the top 80 per cent of spend. Based on an overall supplier spend of approximately \$161 million in 2024, the major categories that represent the top 80 per cent of spend are as follows:

LEVEL 1 SPEND CATEGORY	2024 SPEND (\$000S)
Building and construction	\$10,422
Information technology – equipment and services	\$24,091
Student placements	\$16,942
Facilities management	\$9,803
Consulting services	\$6,921
Marketing and communication services	\$11,551
Rent	\$3,420
Other office and workplace supplies	\$2,915
Utilities	\$6,927
Cleaning	\$6,199
Student recruitment – international	\$13,501
Plant and equipment	\$3,397
Security services	\$3,609
Insurance premiums	\$2,771
Travel and accommodation	\$8,337
Library books, systems and services	\$8,232

* ACU Annual Report 2024



Sourcing of goods and services

Our supply chain activities include working with supply chains from many different sectors. Goods and services are sourced from overseas, as well as locally, generally via Tier 1 suppliers and not directly. Therefore, ACU has in the supply chain those areas and geographic locations that at some stage in the overall chain would be regarded as representing some type of modern slavery risk. The university, through our Finance and Planning directorate, also engages in investment activities.

ACU uses a spend categorisation system. This system best explains the variety of goods and services procured across ACU to meet our many operational demands.

Goods and services may be sourced in any of the following categories, which have been simplified and amalgamated for this report:

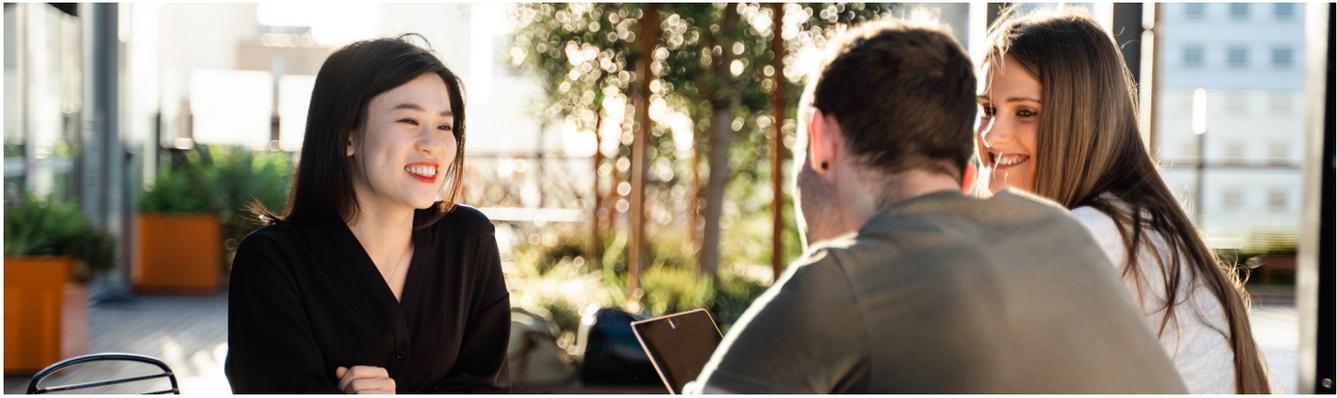
- architectural design services
- audio visual equipment and services
- building and construction – supplies, fit outs, demolition and services
- business and finance systems
- civil engineering and construction services
- cleaning – equipment and services
- clothing and footwear – corporate, promotional and general
- conservation and heritage services
- education services
- environmental services
- equipment disposal services
- event management services
- facilities management – bookshops, catering, maintenance, landscape/gardening and security
- financial services, including valuation services

- health – equipment, consumables and services
- hire equipment and services
- human resources services – employee assistance, recruitment, training and other HR services
- industrial supplies – electrical, hardware and chemicals
- information technology – computer desktops, laptops, copiers, printer and other peripherals
- information technology – software, systems, design, installation and implementation services
- information technology – training, web services, cybersecurity and other professional services
- insurance – providers, brokers and consultancy services
- laboratory supplies – equipment and consumables
- library – books, periodicals, equipment, software and services
- marketing and media services – advertising, creative, photography and digital services
- office supplies – equipment and consumables
- printing services
- other professional services – asset management, auditing, legal, procurement, risk and quality
- property and realty services
- safety apparel, equipment and consumables
- telecommunications – commodities, equipment, carrier and installation services
- transportation and logistics services – courier, freight, postal, relocation and warehousing
- travel and accommodation – agencies, hotels, airlines, trains and vehicles
- utilities – energy, water, equipment, maintenance and related services
- vehicles – supply, rental, fleet management and cleaning services
- waste management services
- water treatment and sewage services
- workplace health and safety services.

Professional services are generally provided by locally based Tier 1 suppliers. In some cases, these Tier 1 suppliers utilise overseas support staff to conduct some of the more transactional aspects of their service offering. This may include services provided out of countries such as India, China and the Philippines.

Equipment, commodities and clothing are generally sourced from overseas, mainly China and South-East Asia, once again via Tier 1 suppliers located in Australia.

ACU, through our membership with Supply Nation, is increasingly sourcing from locally-based Indigenous suppliers, who may nevertheless source some of the items from overseas manufacturers.



Modern slavery risks in investments

Refer to Criterion 4 Actions to address modern slavery risks in investments.

ACU has approximately \$31.2 million in investments, managed through JBWere. The investment sector has very specific benchmarks around ethical investments. There are specific fund managers who only undertake ethical investments – these managers will only invest funds with an organisation where they can obtain complete satisfaction that the organisation is trading ethically and as stated.

However, modern slavery risks in the investment sector could potentially include low visibility across multi-tiered international supply chains, which may involve other high-risk sectors and geographies. In addition to the resulting potential exploitation of victims of modern slavery, identified modern slavery in ACU's investment providers' supply chains could lead to reputational risk which could have a negative impact on the organisation.

Modern slavery risks to students

Refer to Criterion 4 Actions to address modern slavery risks to students.

Students and young people are at a much higher risk of experiencing modern slavery, with international students the most vulnerable, as they are likely to have lower English language skills, fewer nearby family or support networks, and may not be aware of Australian workplace laws.

In 2022, ACU began to consider the risks of modern slavery to international students posed by education recruitment agents in its overseas network. These risks may include unlawful and deceptive recruitment and misleading information by agents, which can lead to debt bondage or increase vulnerability of students to exploitation.

ACU currently has 213 registered international education agents and anticipates that approximately 8,000 international students will be recruited from overseas over the next five years.

We have 30 clauses in our agreements with international student recruitment agents outlining their responsibilities to:

- promote the university in an honest and ethical manner
- provide accurate information on courses, the university and services offered to students
- comply with the ESOS Act 2000 and National Code 2018 with a particular focus on Standard 4 and Standard 6 of The Code
- maintain confidentiality
- act in the best interest of the students.

Any arrangements between students, their families and education agents outside of the above agreements are difficult to monitor in source countries.

Supply chain risks

SPEND RISK ASSESSMENT

ACU undertakes a number of risk assessments. These assessments are provided in part to ACU from platforms developed by the AUPN. These platforms help to inform ACU where attention may be directed to help address or mitigate

modern slavery activities, in conjunction with other means. The data upon which the below analysis is based is subject to review and is continually evolving – it forms an excellent basis for developing ongoing planned activities.

Our people

ACU has a diverse workforce of staff from different cultural backgrounds, ethnicities, and genders. Our Code of Conduct and comprehensive suite of policies and procedures reflect terms and conditions, as well as expected standards of behaviour. All policies and procedures are documented, available on the ACU website and reviewed and updated in accordance with quality review protocols on a scheduled and as needed basis. Included is a policy relating to Protected Disclosures.

Our People Plan 2022-2025 was launched in 2022 and sets out a suite of initiatives in support of ACU's mission and strategic priorities. These include building leadership capability, enhancing health, safety and wellbeing, and supporting a diverse workforce and culture of inclusion.

ACU has an Enterprise Bargaining Agreement (EBA) in place that came into effect in February 2023. The EBA sets out conditions of employment including entitlements and remuneration. Both academic and professional staff are remunerated based on a classification methodology that is fair, transparent and equitable.

One of the initiatives identified in ACU's EBA has been to create a program to convert work performed by casual academics into more permanent forms of employment to reduce ACU's reliance on casual and sessional academic staff. In the first tranche, more than 45 full-time and part-time continuing positions were established, advertised and appointed. These roles were filled exclusively by current and former ACU casual and sessional academics.

ACU has robust mechanisms to receive complaints relating to staff conduct and behaviour, bullying, harassment and discrimination. Formal complaints are usually submitted via a web portal, all of which are then managed by Employment Relations within the People and Capability Directorate. Anonymous complaints can also be submitted.

IN DEVELOPMENT

When recruiting staff through third party recruitment agencies, ACU prefers to utilise the services of a preferred supplier panel, selected via a formal open tender process, and to ensure the panel in place will continue to comply with our rigorous procurement standards and values. Accordingly, a small panel of general recruitment providers has now been established, to commence in early 2025.

A program of work continues to educate staff around key enterprise agreement and policy requirements. This includes a human resourcing metrics dashboard, to provide visibility and transparency over key workforce data and to enable effective decision making.

In 2023, ACU identified inaccuracies in how entitlements were calculated, which had resulted in some casual and sessional academic staff not receiving higher rates of pay where they held PhD qualifications or undertook subject/unit coordination or lecturer-in-charge duties. During 2024, ACU has worked to remediate this issue as quickly as possible; in some situations requiring a correction payment to be made to current and former staff.

A further program of work to review employee entitlements at ACU more broadly is ongoing. We are also working to implement enhanced governance and controls to ensure these errors do not happen again.

Further information may be found in the latest ACU annual report:

ACU Annual Report 2024



Criterion 4: Actions to assess and address risk

SUMMARY OF ACTIONS TAKEN

Below is a summary of some of the actions taken by ACU to date. Some of these items are referred to, or elaborated on, in this and other sections of this report:

- Participation in ACAN and AUPN activities and internal working groups (to share knowledge and assess compliance requirements and risk), including ACAN's year five modern slavery risk management program and ACU's Eradicating Modern Slavery (EMS) Working Group.
- Collation and submission of annual spend data, including supplier information, to both ACAN and AUPN risk assessment systems.
- Involvement of key managers and directors from the most at-risk sectors within ACU in supplier engagement workshops.
- Discussions with key suppliers in identified high-risk supply chains, such as construction, clothing and critical services. Plans underway to have further interactions with prioritised suppliers to address compliance and verification strategies in relation to anti-modern slavery initiatives.
- Planned implementation of additional reporting and compliance requirements through the use of the ACU Tender Portal.
- A vendor category of 'fair trade' has been created in the vendor master of ACU's purchasing system. This allows certified fair-trade companies to be identified for future purchasing activity.
- Our online 'New Supplier Request Form' contains a comprehensive modern slavery questionnaire to be completed by each new supplier prior to onboarding into our finance system.

Specifically, the following actions are in progress or planned:

- To continue to use toolsets created by both ACAN and the AUPN to gather information about modern slavery, anti-modern slavery activity, and legislative requirements.
- Further engagement with ACU's national and state-based managers to reinforce their role and obligations regarding anti-modern slavery measures when making purchasing decisions.
- To continue to deploy to all ACU personnel the online training programs developed by ACAN on the broad requirements of anti-slavery measures and activities.
- To continue to use the detailed ACAN maturity assessment to monitor continuous improvement across any impacted areas of ACU.
- To develop aspects of the ACU Tender Portal to allow it to be used as a due diligence tool to help educate suppliers and to monitor supplier compliance activity in relation to anti-modern slavery measures.

- To continue the engagement with key suppliers in areas of high risk.
- To deploy a SharePoint site which will contain all the initiatives that ACU is currently undertaking in response to modern slavery.
- ACU's membership of the University Procurement Hub (UPH), and increased use of UPH's robust specialised services, which provide the opportunity of source-to-contract cost savings by aggregating spend from participating universities across particular categories. UPH also offers associated benefits such as improved process efficiency, spend visibility and effective spend analysis from richer data and marketing intelligence, with the aim to drive continuous improvement.
- Commencement of implementation of Sievo procurement analytics platform which will facilitate easy visibility into purchasing patterns, to standardise supplier data classification across participating universities, and to strengthen risk assessments across our supply chain. Ongoing ACU Procurement staff attendance at regular University Procurement Analytics Service Champions forums to gain and share knowledge before implementation is completed.
- In late 2024, ACU secured the support of a part-time modern slavery specialist to be embedded in the Finance and Planning team for a fixed term. The role was created to further ACU's examination and analysis of its supply chain, identify areas for continuous improvement, and to make recommendations on activities to strengthen ACU's anti-modern slavery work. It is anticipated that in 2025 the specialist will focus on modern slavery risk assessments of high-risk suppliers, examine Tier 2 of the supply chain for those suppliers, and identify opportunities for collaboration with other teams across ACU to manage modern slavery risks.

ACU's Properties Directorate – addressing modern slavery risks

Facilities management, a responsibility within ACU's Properties Directorate, is a recognised area of high risk – particularly in relation to cleaning and security. To this end, the Properties Directorate has undertaken a number of measures to mitigate this risk, as follows:

- Ensuring all national tenders have a mandatory Q&A field in relation to this issue with respect to:
 - supply chain management
 - wages, salaries, benefits and sub-contracting.
- Continuing to audit and retain documentation of three levels of supply chain for selected high-risk items; level one is ACU, then the Tier 1 supplier (ie. the engaged service provider), and then the Tier 2 supplier (ie Tier 1's sourcing supplier).
- Annually seeking, for all engaged service contracts, a statutory declaration from the vendor and/or their staff confirming the following for each member of staff engaged to provide services to ACU:
 - their name
 - they are a direct employee of the engaged contractor (vendor) with ACU
 - they are employed at the specified ACU campus
 - they are paid in accordance with the modern industrial award stated in the service agreement
 - they receive all their salary benefits, including insurance, superannuation and leave entitlements
 - the statement is made under their own free will and without influence.

Where this information is not able to be provided directly by the vendor's personnel, ACU will verify the information by audit or other validation processes.

ROBUST NEW NATIONAL CLEANING AND SECURITY AGREEMENTS

In 2024, ACU's Properties Directorate finalised two important tender projects. These were each the result of a formal and stringent tender process commenced in 2023 through the University Procurement Hub (via Accenture), to select a security services company and a cleaning company to service ACU's seven Australian campuses. The suppliers' existing Modern Slavery documentation, activities and commitments were a key part of the tender evaluation criteria and a key part of ACU's contracts with the selected companies.

The executed agreements between ACU and the cleaning and security companies require that each of those must:

- take reasonable steps to ensure there is no modern slavery in the supply chains for the contractor agents and or contractors, or in any part of their respective businesses or dealings.
- conduct their businesses in a manner consistent with the principles of the Modern Slavery Act, and that neither the contractor nor its agents, contractors or employees has been convicted of any offences under the Modern Slavery Act nor been the subject of any investigation or enforcement under the Modern Slavery Act.
- implement due diligence procedures for its own contractor agents, contractors and other participants to ensure that there is no modern slavery in its supply chains. These procedures are documented in the annual modern slavery statements prepared by the respective organisations (as below.)
- in the first quarter of each year, deliver to ACU an annual modern slavery statement detailing what steps the company has taken to ensure modern slavery is not present in its supply chain or any part of its business. The Agreement stipulates that *"The Contractor must deliver to ACU... no later than 3 calendar months from December 31 each year, an annual statement prepared in accordance with section 16(1) of the Modern Slavery Act, including, but not limited to, the steps it has taken to ensure that Modern Slavery is not taking place in any of its supply chains or in any part of its business."* The suppliers' annual statements are reviewed by ACU – and, where indicated, appropriate recommendations made to the supplier for future improvements, adjustments or corrective action. The first annual statement has been received from each of the organisations.
- notify ACU immediately should it become aware of modern slavery – or even suspect it, in any part of its supply chain.

Furthermore specific clauses in each of these agreements stipulate that the contractors may be subject to annual integrity payroll audits by a third party auditor nominated by ACU, and that *"The Contractor must deliver to ACU... such other information or reports as may reasonably be required from time to time by ACU to comply with the requirements, or avoid any contravention, of the Modern Slavery Act."*

Development and expansion of Sedex - to monitor, report on and mitigate ACU supplier risk

Sedex is the world's largest online platform for collecting, sharing and auditing ethical supply chain information. Sedex enables self-reporting of suppliers against industry sector databases.

In mid-2021, ACU signed an ACAN agreement to use Sedex and, in late 2021, commenced the supplier onboarding process. We initially invited 49 high-risk ACU suppliers to join Sedex, requesting they complete a detailed self-assessment questionnaire about their organisation and connect with ACU. This ongoing onboarding process allows us to build and gain strong visibility and compliance capabilities over our supply chain and its inherent risks. As of the end of 2024, 55 ACU suppliers are on Sedex, with 276 suppliers having completed ACAN's Supplier Survey.

The Sedex tool has a number of useful capabilities and we will continue to explore and implement these further. In January of each year, ACU provides the previous year's supplier spend data and contacts to ACAN for the purposes of confirming correct ACAN taxonomy and to cross-reference with and build information for ACAN's existing supplier base, and to facilitate ACAN's assistance in 2025 to coordinate for ACU:

- supplier invites to webinars and pre-assessment questionnaires; and
- further supplier Sedex onboarding.

The Sedex platform/process can be used to:

- easily find existing suppliers within the sector and create relationships with them
- check supplier progress as they complete the steps in the onboarding process
- review each supplier individually and engage with them around improvement
- put higher-risk suppliers into an audit program
- create intuitive data reports and insights
- identify deficiencies for discussion in more detail with the supplier
- pull out specific topics of concern and take a specific issue-based approach.

Sedex representatives continue to support ACU Procurement staff, providing training on Sedex functions and updates, and offering assistance and guidance to use the tool effectively.

Across 2024 and moving forward, ACU continues to increase its utilisation of ACAN related services, including supplier base analysis and the resulting further onboarding of suppliers to Sedex.

In 2024, ACU Procurement staff participated in Sedex member in-person roundtable discussions. These events brought together national and international organisations from a range of different industries, to workshop collaborative strategies to identify, manage and remediate modern slavery risks. Participants workshopped programme approaches, learnings and common challenges.

The use of Sedex complements the similar process also being undertaken through the AUPN modern slavery dashboard (which is specific to suppliers across the university sector).





Focus on clothing

Encompassing quality regalia, ACU-branded clothing and uniforms, and other items – apparel is an important category for ACU. It represents and highlights the ACU brand and reputation, and holds a vital place in students' memories across their ACU journey – from uniforms signifying professional development and sports victories, to graduation gowns marking the culmination of years of hard work.

ACU purchases clothing from a range of suppliers, for multiple purposes.

However, the clothing industry is very high risk for modern slavery practices. This risk exists across all phases of production and manufacture. Clothing suppliers typically employ several overseas factories, and so scrutiny and visibility can be more challenging. This can make it harder to monitor and address labour practices effectively. Risks are many and include forced labour, child labour, trafficking, underpayment, excessive overtime, insecure labour contracts and lack of worker empowerment. Laws vary across different countries, which can result in disparities as to how modern slavery risks are handled and addressed.

During 2024, ACU continued to examine its clothing supply chain, working closely with Tier 1 suppliers to ensure that mechanisms were in place to mitigate modern slavery risks. Three of ACU's apparel suppliers are featured below.

ANDREWS CORPORATE CLOTHING

Andrews Corporate Clothing (ACC), ACU's preferred uniform supplier, has a multi-layered approach to providing safeguards in their supply chain in Australia and offshore. ACC has been accredited by Ethical Clothing Australia and has had its Australian supply chain fully audited to ensure the fair and proper treatment of all workers. Ethical Clothing Australia works with local textile, clothing and footwear (TCF) businesses to protect and uphold the rights of Australian garment workers.

ACC's commitment to an ethical supply chain doesn't stop at Australia's borders. ACC utilises several factories internationally for the manufacture of a number of garments. Each of their international manufacturers must meet SA8000 standards for workplace practices, which cover key areas of social accountability in the workforce - including forced labour, working hours, remuneration, and health and safety.

ACC undertakes third party audits (including Business Social Compliance Initiative (BSCI) and Sedex) of all its offshore manufacturing partners to ensure ethical supply chain standards are met. In addition to this, ACC directors and management make numerous inspections of all local and offshore manufacturing facilities in order to ensure standards are being maintained by partners. ACC's partners must execute a Supply Agreement detailing and committing to various Ethical Supply standards.

BLUEGUM CLOTHING COMPANY

ACU's Student Life's aim is to bring students the excitement and experience of all things university outside of the classroom. In 2024, it sourced casual clothing for volunteers from Bluegum Clothing Company. Bluegum responsibly sources its products and is accredited by Ethical Clothing Australia. It is also member of the Fair Labour Association and Worldwide Responsible Accredited Production. The Government of Victoria has included Bluegum on the Ethical Supplier Register for uniforms and PPE. Bluegum is committed to ethical and social procurement compliance in its offshore supply chain.

GFP EVENTS

GFP Events is a long-standing and valued provider of graduation regalia to ACU, and as such monitor their supply chain closely. Academic regalia made from recycled fabric is manufactured in China and India, where GFP conduct regular site visits to factories and small businesses. These visits provide an opportunity for GFP to reinforce their stance on modern slavery. Fair payment for goods is central to GFP's ethical business practices, as are good working environments and conditions for workers in China and India.

GFP works with Trace, an organisation assisting them in measuring their carbon footprint, setting clear goals to reduce emissions, and making sustainability part of everyday decisions while they track progress along the way. GFP also works with Loop Upcycling, a West Australian social enterprise company that provides businesses with solutions to utilise redundant textiles and create work opportunities for people experiencing vulnerability in the community. Currently, Loop are turning obsolete and old hoods into teddy hoods and other accessories for GFP's merchandise range.

ACU PROCUREMENT POLICY

Supplier engagement is in accordance with the ACU Procurement Policy, which underwent substantial revision in 2022 and 2024. The policy sets out how sourcing decisions may be undertaken by ACU staff. The policy is underpinned by procedural and reference materials, which establish minimum requirements for key suppliers.

In 2022, a clause was introduced stating ACU's commitment to tackling modern slavery practices at every level, including that:

"Staff purchasers of university goods and services are required to take steps to identify and minimise any modern slavery risks and to take into consideration the principles of the *Modern Slavery Act 2018 (Cth)*, the commitments made by ACU to date towards eradicating modern slavery and human trafficking, and to ensure suppliers to ACU:

- 8.1.14.1. "conduct their businesses in a manner that is consistent with the principles of the *Modern Slavery Act*"
- 8.1.14.2. "take reasonable steps to ensure that there is no modern slavery in the supply chains of their agents, contractors, and/or sub-contractors or any part of their respective businesses or dealings."

ACU's Procurement Policy underwent further change in 2024, which included adding a section on Supplier Agreements, which stipulates that where an ACU contract template document (containing an existing pre-approved and robust Modern Slavery Clause) is not used, in favour of the supplier's template, the staff member must ask ACU's Office of General Counsel to insert a suitable Modern Slavery Clause during a mandatory legal review of the Agreement, prior to its execution.

ACU SOURCING PROCESS – TENDER, MINIMUM SUPPLIER AND NEW SUPPLIER REQUIREMENTS, AND RELATED DOCUMENTATION

We have transitioned to addressing modern slavery as it relates to our new supplier touchpoints upfront – when undertaking tenders and onboarding suppliers, and as existing supplier contracts are extended or renewed – while continuing to review our existing supplier base.

ACU has included requirements for sustainable and ethical sourcing, including anti-slavery measures, in our tender and contract template documentation for a number of years. These continue to be upgraded, with input from ACU legal counsel, to reflect more stringent requirements, and have been applied to all procurement activities that utilise ACU's formal sourcing processes.

These have included sourcing in relation to high-risk sectors such as corporate apparel supply. These minimum requirements reference sustainability, ethical sourcing and anti-slavery requirements. ACU requires suppliers to provide information about countries and places of manufacture and what auditing and compliance requirements they have in place.

To this end, specific and robust anti-modern slavery clauses have been built into ACU's full suite of tender and contract template documentation (which includes tailored documentation for services, goods, contractors, consultants and technology). Our online 'New Supplier Request Form' contains a comprehensive modern slavery questionnaire to be completed by each new supplier prior to onboarding into our finance system.

All suppliers of goods to ACU in tender situations must answer a detailed tender assessment criterion titled 'Commitment to Ethical Sourcing', which requires a supplier's comprehensive written response as to their commitment,

policies, processes and actions in relation to sustainability, ethical sourcing and modern slavery. This question is also included in our 'Minimum Requirements For Suppliers of Goods and Services to ACU – In Non-Tender Situations'. This is to provide transparency that everything possible is being done to avoid slavery practices in the supply chain.

Supply arrangements resulting from formalised tender processes are generally managed under formal contract agreements involving key performance indicators for effective performance management. Tender documentation and contracts are maintained in SharePoint databases, and formal tendering processes for sourcing projects utilise a hosted tender portal arrangement.

EMARKETPLACE CATALOGUE

The ACU eMarketplace catalogue displays products from a range of different suppliers which can be selected by staff using ACU's TechOne online system for requisitioning and purchasing. The catalogue is restricted to preferred suppliers and their products. The eMarketplace administrators have started working with the network suppliers to start tagging their catalogue products, in order to track ESG spend moving forward, so suppliers will be able to start tagging their own sustainable and Indigenous source products and their modern slavery compliance.

MODERN SLAVERY – STAFF TRAINING

ACU uses the online training program modules developed by ACAN to educate key directors and managers across ACU on the broad requirements of anti-slavery measures and activities. This was supplemented by an in-person workshop run by ACAN. ACU's People and Capability Directorate worked with ACAN to add the training modules developed by ACAN to the suite of training modules available to all ACU personnel.

All staff members involved in purchasing and procurement decision-making are required to undertake, and have undertaken, the available ACAN modern slavery training modules. Other interested staff members are actively encouraged to increase their awareness and understanding of the impacts of modern slavery by undertaking the modules.

Directors and managers were advised that while all staff would have the option to elect to complete the training modules (as also communicated in ACU's internal communication, the *Staff Bulletin*), it is a mandatory requirement for certain staff groups (as follows), including those that make purchasing and procurement decisions as part of their role, including:

- Group 1. Management levels 5 and 6 including National and State Managers.
- Group 2. Faculty Finance Managers, Finance Portfolio Management Accountants, Finance Procurement personnel, Properties Facilities Managers at site or state level and Properties Capital Development and Project Managers, if not at Levels 5 or 6.
- Group 3. Designated purchasing staff within a faculty or directorate as nominated by management level 6 or higher.

At the end of 2024, approximately 429 staff (including directors and managers) had completed the two introductory modules 'Modern Slavery 101' and 'Business Relevance'.

ACU's People and Capability Directorate is currently reviewing its processes regarding enrolment into the modern slavery training modules, to improve completion rates and outcomes. Moving forward this is expected to include:

- automated enrolment for the target audience
- completion reminder notifications to those enrolled
- expected timelines for completion.

ACU membership of key affiliated associations (with ACU staff attendance at regular meetings)

ACAN Anti-Modern Slavery Working Group: In 2024, 10 monthly ACAN webinars and five supplementary webinars were held. In addition, an ACAN audit forum was held in both Sydney and Melbourne, and ACU's ACAN Program manager hosted a valuable half day planning session for ACU's Eradicating Modern Slavery Group members.

AUPN Modern Slavery Working Group Anti-slavery Forum meetings: Nine meetings were held in 2024. Meetings featured a range of informative presentations, including by Ethical Clothing Australia, Property Council of Australia and Australian Red Cross, with participating universities generously sharing their approach to managing modern slavery risk.

ACU's Eradicating Modern Slavery (EMS) Working Group was established towards the end of 2020. The EMS Working Group comprises members of the ACU senior executive, other key ACU personnel, and representatives from the Catholic Archdiocese of Sydney's Anti-Slavery Taskforce. Two meetings and a half-day planning day were held in 2024. The EMS Working Group's objectives are to:

- provide input and advice to the university on issues related to modern slavery
- actively support the development and implementation of ACU's Modern Slavery Action Plan
- help ACU to determine priority actions to be undertaken and to establish annual goals and targets
- monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness
- ensure ACU meets the requirements of the Modern Slavery Act 2018 (Cth)
- raise awareness across ACU, including among students and professional and academic staff.

Since inception, key focus points for ACU's EMS Working Group have included:

- the redesign, expansion and enhancement of the ACU website's eradicating modern slavery information page
- providing a forum to facilitate information flow and debate on modern slavery risks across ACU's operations and supply chain
- continuing to raise awareness about modern slavery risks (and advise on potential actions to address these) across the university
- monitoring and reviewing actions taken to assess and address modern slavery risks and evaluate their effectiveness.

In August 2024, the Chair coordinated and held a half-day EMS Group Planning Session (in Sydney and online), to:

- discuss action planning and working roles and responsibilities within the group
- brainstorm potential activities, initiatives and commitments moving forward
- consider potential future ACU staff additions to the group's membership, where there may be a knowledge or reach gap
- review the 2023 Modern Slavery Statement.

The ACAN Program Manager attended and provided a comprehensive presentation on both updates and reminders to the group on the ACAN framework and the Modern Slavery Act requirements. *Domus 8.7* integration into ACU channels, and ACU's spend and risk profile were also discussed.

In late 2024, the Chair of the Eradicating Modern Slavery Working Group and other group members were invited to present on ACU's Human Research Ethics Committee's Training Day. The committee, together with Ethics Panels, ensures all research conducted by ACU staff or students involving humans is conducted in an ethical manner, and that the rights and interests of research participants are protected.

In the presentation, titled 'Ending Modern Slavery at ACU' the EMS group members covered off with colleagues the legislative requirements the university needed to align with, as well as the legislation's alignment with the university mission. Information was provided on actions undertaken across the university to address modern slavery in its supply chains as well as modern slavery inclusion in the academic/teaching curricular of the university. Discussion on how research staff could contribute to identification and elimination of modern slavery was also undertaken.

ACU's EMS group was pleased to support and participate in ground-breaking experimental research by RMIT University, testing practical solutions to improve remediation of modern **slavery in supply chains**. Supporting this kind of research is vital to continuous improvement and is an expression of ACU's commitment to going beyond compliance to actively participating in impactful change.

Moving forward into 2025, the Working Group's focus will include:

- working with relevant staff to embed anti-slavery principles into ACU's staff induction program, and the organisation's suite of policies and procedures relating to conduct, decision making, risk management, internal organisation and management
- reviewing the ACU website to look for opportunities to link in MS references and educational resources, such as case studies
- a review of the working group's structure, membership and activities – to ensure it is optimised to fulfil its purpose.

ACU's general framework for addressing the potential for modern slavery

ACU has developed a planned response and adopted the following measures to aid the eradication of modern slavery in its supply chains.

ACU's five anti-modern slavery (AMS) foundation focus areas of support

From the commencement of its anti-slavery journey, ACU has identified, created initiatives around and will continue to consolidate into its actions five fundamental focus areas of support to address slavery risks in its supply chains.

For several years, ACU staff have actively contributed to the anti-slavery working groups of both ACAN and the AUPN, and attended regular meetings and additional information

and planning sessions. A number of the actions required to give effect to the following five focus areas of support are joint endeavours being managed either by ACAN or the AUPN, while some are ACU's specific responses.

These actions are detailed under the following anti-modern slavery (AMS) focus areas of support.

FOCUS AREA 1: A PURCHASING COMMITMENT

A definitive statement on the position of ACU in having sourcing arrangements with suppliers which have identified slavery practices in their supply chains:

- It is ACU's policy to continue to move towards not having supply arrangements with suppliers that have modern slavery practices in the supply chain of the goods or services being provided. New tendering opportunities and contractual arrangements are to specify this requirement. Where it becomes evident an existing supply arrangement has modern slavery practices within the supply chain of a supplier, then to the extent that the supplier is directly responsible for this practice, this will be a cause for immediate termination of the supply arrangement, unless satisfactory remedial action is able to be taken and it can be shown there were mitigating factors to help exonerate the supplier from any deliberate or criminal behaviour. Before any decision to terminate, the supplier will be given the opportunity to address the issues raised.
- Where it becomes evident an existing supply arrangement has modern slavery practices within a supplier's supply chain, then to the extent that the identified practice is linked to the immediate supplier and that the immediate supplier is not directly responsible for this practice, the immediate supplier will be given a timeframe (to be negotiated, but generally no greater than 12 months) to take the actions necessary to eliminate or mitigate the identified modern slavery practices in its supply chain, which can be verified to ACU's satisfaction.
- Where modern slavery practices are understood to exist within global supply chains and are not readily amenable to corrective actions, or where taking such action may severely impact those personnel to whom anti-slavery initiatives are designed to protect, then ACU will collaborate with organisations to help mitigate slavery practices, protect the people concerned, and help bring about positive change to the extent possible given the circumstances.

- This commitment extends to illegal, unethical, unfair and exploitative practices in relation to the engagement of workers in the supply chain, where those practices are able to be established, and the same responses as detailed above shall apply.

ACTION: ACU has anti-modern slavery requirements built into all of our template contract and tender documents. These are subject to ongoing review. A comprehensive modern slavery questionnaire must be completed by all new suppliers, through the onboarding process.

FOCUS AREA 2: ONGOING TRAINING AND EDUCATION

To use both sector-based resources and ACU-specific resources to help educate both ACU employees and suppliers about the existence of modern slavery, how it may be identified, what actions they can take to mitigate modern slavery activity, and what ACU's expectations of them are.

ACTION: The following are in progress and in various stages of completion:

- ACU has access to the toolsets created by both ACAN and the AUPN in relation to information about modern slavery, anti-modern slavery activity and legislative requirements.
- ACU has provided information to ACU's national and state-based managers, who have a responsibility for purchasing decisions, about pending activity associated with anti-modern slavery measures.
- ACU has used the online training programs developed by ACAN to educate key directors and managers across ACU on the broad requirements of anti-slavery measures and activities. This was supplemented by an in-person workshop run by ACAN.
- ACU's People and Capability Directorate worked with ACAN to add the training modules developed by ACAN to the suite of training modules available to all ACU personnel. Two modules were available to ACU staff in 2024.

- ACAN has provided an online self-assessment tool to assist participating ACAN entities to assess where additional education and action from different sections may be required. This self-assessment was recently conducted to cover 2024, with those results presented as a maturity assessment (refer to Criterion 5).
- The ACU Tender Portal will continue to be used to provide information to suppliers on modern slavery, anti-modern slavery activity and legal requirements, and to obtain from suppliers a response to their awareness of the issue and measures they are taking to address this.
- Key suppliers to ACU have been contacted directly or asked to participate in online education forums about modern slavery, the risks in their industry, and what they need to do to address them. This includes ACU's key apparel provider for health sciences uniforms and key construction and facilities maintenance suppliers.

FOCUS AREA 3: A PRODUCT AND RISK CATEGORISATION SYSTEM AND SOFTWARE TOOLS

Both ACAN and the AUPN have developed a risk categorisation system based on various aspects of the supply chain, such as the type of good or service, and where services are provided or made.

ACTION: ACU will continue to provide spend and other data to identify relevant risk categorisations. The supporting software tools will be utilised to further analyse the data, as well as to:

- describe the product and risk categorisations
- allocate specific suppliers to their respective product and risk categorisations, which may include the assignment of primary, secondary or other tier levels of risk
- enable the collation of suppliers' information
- enable suppliers to provide information directly to the tools via portal access
- collate suppliers' actions
- enable suppliers to provide a sector-wide response.

- be a single point of contact for all suppliers, to avoid suppliers having to make multiple responses to different entities.

The tools will help with ongoing supplier risk assessment and actions required within supply chains to monitor and manage potential modern slavery activity.

FOCUS AREA 4: REMEDIAL ACTION

Remedies to identify modern slavery practices will take a variety of forms, as summarised below:

- Managing supplier relationships in accordance with Focus Area 1: A Purchasing Commitment.
- Using specialist organisations such as Sedex, to help identify modern slavery practices in existing supply chains, and to advise or assist with remedial action.
- Adopting an appropriate remedy pathway of Domus 8.7 as promoted by ACAN.

ACTION: ACU is either in the process of or committed to implementing the above points.

FOCUS AREA 5: REPORTING CONSISTENCY

Reporting needs to meet legislative requirements and be consistent with the reporting format of the organisation, or organisations, with which ACU is participating in producing its consolidated annual statement.

ACTION:

- ACU will continue to collaborate with ACAN to submit a comprehensive and consolidated annual statement.
- Key ACU personnel responsible for generating the statement have attended ACAN report writing workshops, and regularly attend educational seminars, workshops and meetings run by ACAN, the AUPN and Sedex – in the process learning from and sharing knowledge with the other participants.
- ACU uses guidance and feedback provided by ACAN throughout the process of creating its annual statement.



Modern slavery action plan and road map

ROADMAP OF AREAS REQUIRING FURTHER ACTIVITY - IN RESPONSE TO ACU'S MATURITY ASSESSMENT

The roadmap below is based on areas identified through ACU's ongoing maturity assessment process (refer to Criterion 5) and indicates key areas of activity required to be implemented. It summarises ACU's current position and indicates where additional undertakings are required.

MANAGEMENT SYSTEMS	HUMAN RESOURCES AND RECRUITMENT	PROCUREMENT AND SUPPLY CHAIN	RISK MANAGEMENT	CUSTOMERS AND STAKEHOLDERS
ACU Senate and management commitment to anti-modern slavery (AMS).	Management across ACU is aware of modern slavery. Further involvement through planned training platforms to extend this knowledge.	AMS requirements have been incorporated into processes and tender and contract documentation. Need to be reviewed and updated as necessary.	MS risks have been captured in ACU's formal risk management system. The documented risks are to be periodically reviewed and actioned as required under ACU's risk management protocols.	ACU's customers are students and shareholders, who are themselves underpinned by the Sustainability Bond. The mission and values espoused by ACU make AMS initiatives of critical interest and importance to its customer and stakeholder base. ACU will continue to engage with these vital groups to present our activity in this area.
Further integration into business processes is required.	Key staff including senior managers and directors have been involved in supplier training workshops and have undergone training themselves.	More formalised mechanism to assess MS risks, to be considered for inclusion into sourcing and contracting activities. All new suppliers now required to complete comprehensive MS questionnaire. ACU membership of UPH and increased use of UPH specialised procurement services.	Some aspects of the key supply chain could be susceptible to MS risks, especially in: the construction sector due to the large amount of capital infrastructure underway; critical facilities services, such as cleaning and security; and key commodity supplies such as apparel and computers (including computer recycling and e-waste services). Although these are understood and monitored accordingly, ACU will continue to be vigilant in these aspects of our supply chain.	ACU is keen to openly share our AMS activities through various public forums. This includes this statement, the ACU Tender Portal when that function is developed, the Catholic Archdiocese newsletters and other publicly available media. In doing so, suppliers will not be named, confidential information will not be shared, and the privacy of entities with which ACU has dealings will be respected.
Further action is required to educate suppliers and verify their AMS initiatives.	Two training modules developed with ACAN have been made available to all staff and made mandatory for certain groups including managers and those who make purchasing and procurement decisions.	ACAN and AUPN tools, in conjunction with other data analysis tools, are to be used to provide updated supplier and spend MS risk assessments, including the use of specialist service providers.	Risks in the extended supply chain are to be monitored via the industry-based tools being made available to ACU from both ACAN and the AUPN.	ACU is to develop a more formalised mechanism to receive feedback about MS issues from inside the university as well as from suppliers.
Development of organisational and supply chain reporting of modern slavery (MS) risks.	Hiring policies and HR systems to be further reviewed to ensure key requirements relating to AMS initiatives are incorporated.	Tools being developed to ensure AMS initiatives and requirements are made readily available to all suppliers to ACU, including via ACU eMarketplace's upcoming supplier self-tagging of catalogue products regarding their MS compliance.	MS risks are reported through the ACU risk management system. Other reporting mechanisms will be considered for development.	ACU needs to consider what methods may be appropriate to allow direct communication with workers in supply chains in order to receive feedback directly and not from management in a candid, private and non-threatening manner.
	AMS initiatives are made known during recruitment and to relevant agencies. Needs review to ensure existing practices are adequate.	The above tools will enable supplier MS risks to be monitored, and corrective actions taken to address concerns where they arise.		
		A continuing effort to engage with, and provide opportunities to, certified fair-trade organisations.		

Actions to address modern slavery risks in investments

As investors, we aim to ensure that modern slavery does not occur in the companies in which we invest, and in their supply chains. This includes funds managed by external managers and our self-managed portfolios, which are mainly bank term deposits. The university supports investments in the Catholic Church's charitable, religious, and educational works. We also support ethical and socially responsible investments. We invest only with organisations that demonstrate strong environmental stewardship, consumer protection, human rights, and employee diversity practices.

Actions to address modern slavery risks to students

STUDENTS - INTERNATIONAL

In late 2022, ACU Global Engagement committed to reviewing all agreements issued to overseas-based education agents for the recruitment of international students. In 2023, our International Education Agent agreements were updated to contain a comprehensive clause which relates specifically to the university's anti-modern slavery requirements, based on content provided by ACU Procurement to vendors, and in consultation with relevant internal ACU stakeholders, including the Office of the General Counsel.

The agreements continue to have comprehensive references to agents' responsibilities in the promotion of the university, and service provision that complies with the ESOS Act 2000 and The National Code 2018. Procedures are in place to address any potential misbehaviour or inappropriate conduct by agents.

Through direct communication, ACU can empower international students to understand their rights and disclose and seek support (including counselling and legal support) to address any unethical arrangements with recruiters or any exploitation experienced through work, housing or other arrangements post-arrival.

ACU Global Engagement provides information on Australian work rights to each intake for commencing international students, based on a collaboration with ACU's Careers and Employability Service. International students have equal work rights to all other workers in Australia. To ensure new international students understand this, we have developed and provide them with a short presentation on working rights in Australia, which includes information about minimum wage, maximum working hours, the role of the Fair Work Ombudsman, and a case study video.





In addition to the ongoing support referenced above, from 2023 commencing students are asked upon arrival to complete ACU's onboarding survey – which contains questions that relate to their experience of the services provided by their education agent, with a focus on meeting TEQSA and National Code requirements in relation to orientation. The working group met in early 2024 to strengthen the existing survey questions. The new survey went live in late April 2024 and the results will be included in next years statement.

STUDENTS - GENERAL

All students at ACU, including international students, have access to free, confidential counselling services on campus. ACU counsellors are experienced and trained psychologists or social workers who deliver specialised programs in the areas of mental health, emotional wellbeing and enhancing mental resilience. All students can access six free counselling sessions per year. Each face-to-face session runs for 50-minutes and provides the opportunity to discuss any issues of concern in a supportive environment. Two 30-minute drop-in sessions are also available on campus each day.

ACAN program managers recently trained 12 ACU counsellors on how to identify and respond safely to disclosures of modern slavery, also making a recording of the session which now forms an internal resource that can be viewed by new staff. ACAN program managers also created a new referral resource for counsellors that will help any students who disclose modern slavery indicators to seek further advice and assistance, including legal advice.

ACU students, including international students, have access to two free, confidential 45-minute legal advice sessions with a private law firm that includes access to written advice. ACAN program managers have conducted outreach to the law firm to discuss training for their staff on how to increase awareness of and respond to any indicators of modern slavery, moving forward.

In 2024, ACU's Careers and Employability team undertook fair work training from the Ombudsman, to ensure they are well-prepared to offer fair work support and advice through appointments to assist students to access correct and current information. It is expected this training will continue annually.

ACU's Access and Disability Service team assess all organisational partnerships and suppliers for modern slavery compliance, with priority given to those demonstrating robust policies, certification and practice against modern slavery. Where suppliers do not provide formal documentation, the team engages to ensure they have conducted due diligence in relation to their work practices and supply chains.

ACU's Safeguarding and Student Safety team assists any student who may be facing difficult times or who may have experienced, observed or heard about sexual behaviour which may be illegal, inappropriate, threatening or concerning (including situations related to modern slavery).

Students can access the service via:

- an online form
- in-person via a Safety Support Officer, a trusted member of staff, an ACU counsellor or directly via the Safeguarding and Student Safety team
- phone via the National Security Centre
- legal services funded by ACU.

Support is tailored to the specific situation and need, and may include (but is not limited to):

- access to free counselling and legal advice sessions
- academic adjustments and extensions
- assistance with reporting, including education around options
- assistance with accommodation/housing
- welfare checks.

While prepared to do so, to date the team have not dealt with any matters that relate to modern slavery.

Criterion 5: Effectiveness assessment

ACU Modern Slavery Maturity Assessment

To assess the ongoing level of maturity and progress made across all areas of ACU, a self-assessment is performed annually. ACAN generates a maturity assessment from an annual Entity Profile survey completed by ACU Procurement, with information sourced from across ACU.

The ACAN maturity assessment provides a score card of ACU's capabilities to mitigate the risk of modern slavery in its operations and supply chains. The score card is used by our EMS Working Group to set future direction, establish a multi-year action plan and identify where to allocate resources for the most benefit.

The score card ranges from: 0 to 100.

Achieving a score of 100 – which signifies the complete demonstrated capability to assure modern slavery risks are not present in operations and supply chains through validated and verifiable evidence – is an aspirational and long-term goal.

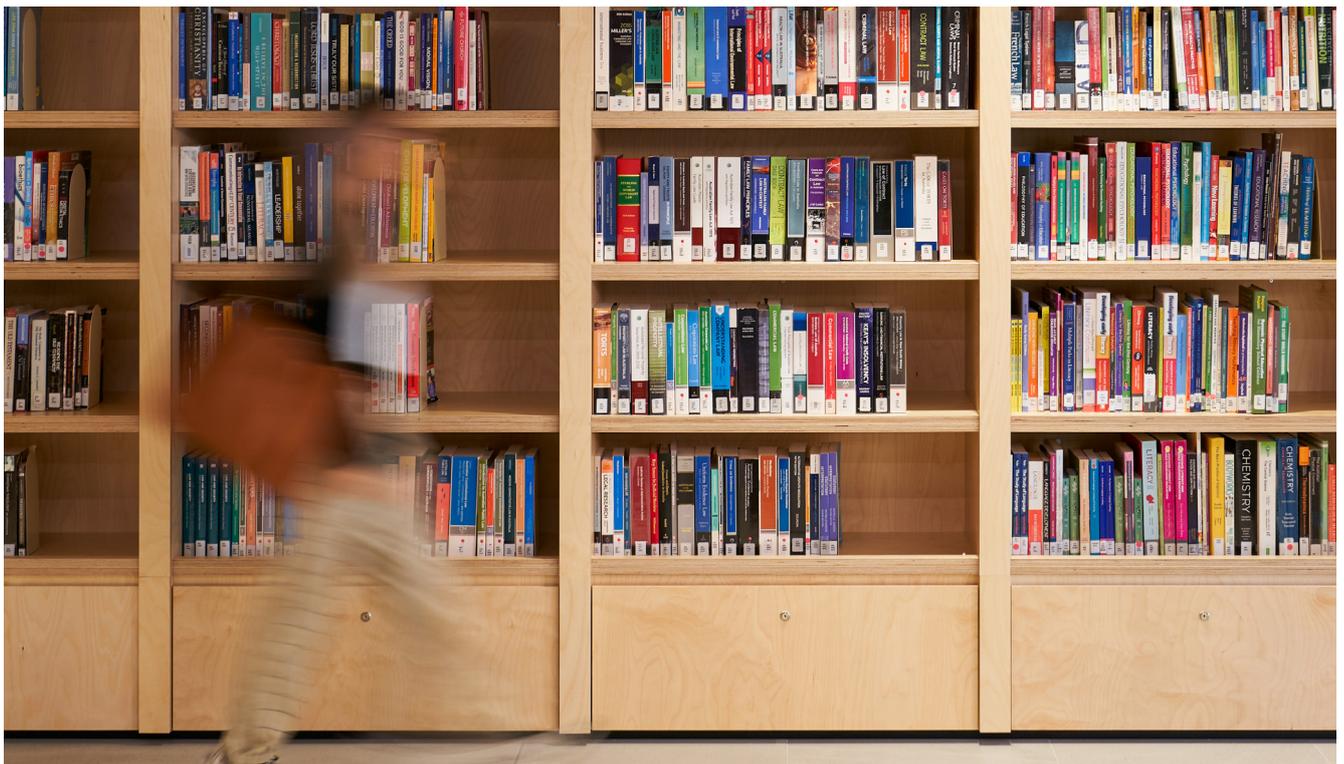
The journey towards ending modern slavery is progressive, requiring sustained effort, learning, adaptation, capability and capacity-building and investment of resources proportionate to the complexity of the risks.

The score card provides for:

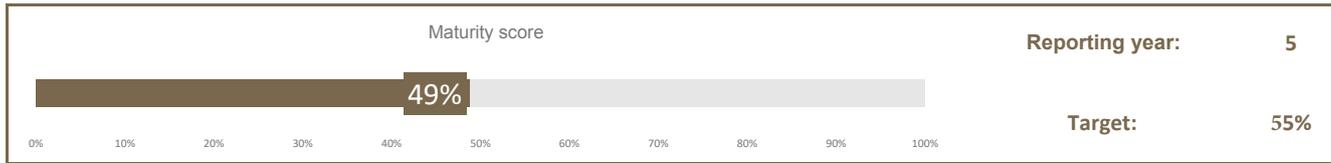
Holistic overview: Using a 0 to 100 scale provides an overall and long-term view of progress where even offering a strategic perspective can inform decision-making and strategic planning. By mapping progress on a more nuanced continuum, entities can show improvement through incremental steps towards broader, long-term objectives. Understanding that ending modern slavery is an ambitious goal, the scoring system is designed to recognise more granular actions and impacts.

Contextual understanding: Recognising that entities vary in size, sector, and operational complexity, the scoring system allows for a tailored assessment that considers these factors. A score should be interpreted in the context of the entity's specific challenges and opportunities for impact.

Flexibility and adaptability: Organisations are dynamic and their capabilities can change due to financial resources, organisational structures, the regulatory environment, technological infrastructure etc. The scoring is flexible so it can respond to these shifts.



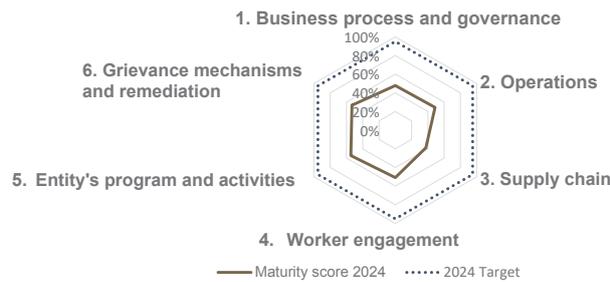
The 2024 year result for ACU is as follows:



Australian Catholic University (ACU) – 2024 analysis by pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2024	
1. Business process and governance	54%	58%	41%	39%	48%	↑ 4%
2. Operations	48%	68%	42%	38%	49%	↑ 6%
3. Supply chain	13%	80%	31%	27%	38%	↑ 2%
4. Worker engagement	45%	64%	45%	49%	51%	↑ 11%
5. Entity's program and activities	100%	30%	50%	38%	55%	↑ 6%
6. Grievance mechanisms and remediation	63%	60%	51%	39%	53%	↑ 1%
Average	54%	60%	43%	38%	49%	
	↑ 5%	↑ 4%	↑ 5%	↑ 5%	↑ 5%	

Maturity score 2024 individual scoring by pillar and sub pillar, including averages and total 2024 score



Maturity score
2023 – 44%
2024 – 49%

ACU's score falls in the 31% – 50% = **Emerging Practice** (Years 3 – 5) level. ACU's 2023 maturity assessment score was **44 per cent**, with our 2024 score increasing to **49 per cent** based on initiatives and practices undertaken or introduced across the university over the reporting period. Emerging practices represent methodologies that are recognised as efficient and effective in managing modern slavery risks, based on current knowledge and evidence. These practices are benchmarked and serve as models for emulation. This means ACU's processes related to modern slavery risk management are well-defined, standardised, and integrated into the organisational culture and operations. The focus extends beyond individual projects to include organisation-wide standardisation and continuous process, accompanied by adequate staffing and resources.

Baseline data – In 2023, ACAN introduced the ACU baseline data table (see 2024 table at right), which can be used to show continuous improvement over time, by comparing to previous years.

ACTIVITY	ACU
INTERNAL / STAFF	
Hours spent on modern slavery activities	720
Individual staff completed e-learning	468 c
E-learning modules completed	897 c
EXTERNAL / SUPPLIER ENGAGEMENT	
Total number of ACU suppliers	3007
Number of suppliers with visible contact information	2689
Number of suppliers across high-risk categories	982
Number of ACAN Supplier Surveys completed	276 c
Invited to join Sedex	85 c
Joined Sedex	37 c
Sedex SAQ completed	8 c
DOMUS 8.7 EXTERNAL REFERRALS AND INTERNAL GRIEVANCE MECHANISMS	
Contacts made via worker voice / grievance mechanism and other avenues as stated*	
Faircall external whistleblowing service	24
Staff complaints (via web portal – anonymous option available)	25
Student grievances (via AskACU webform)	242
Individuals identified or referred for modern slavery assessment	0
Individuals with modern slavery cases remediated	0

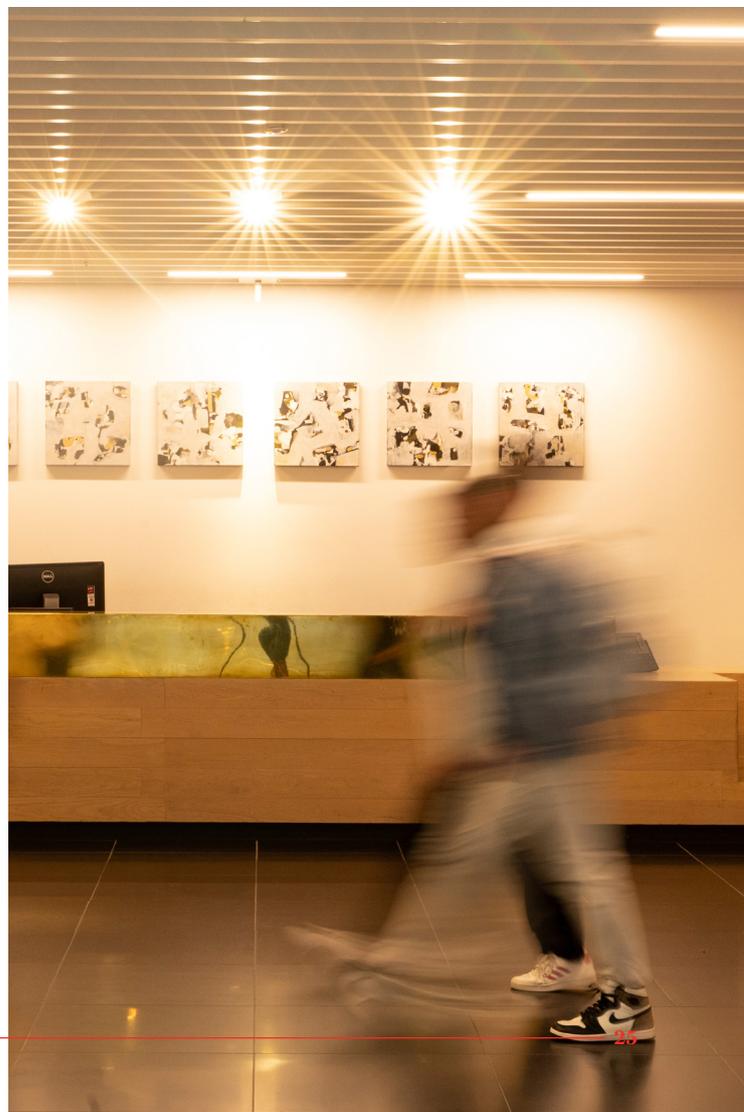
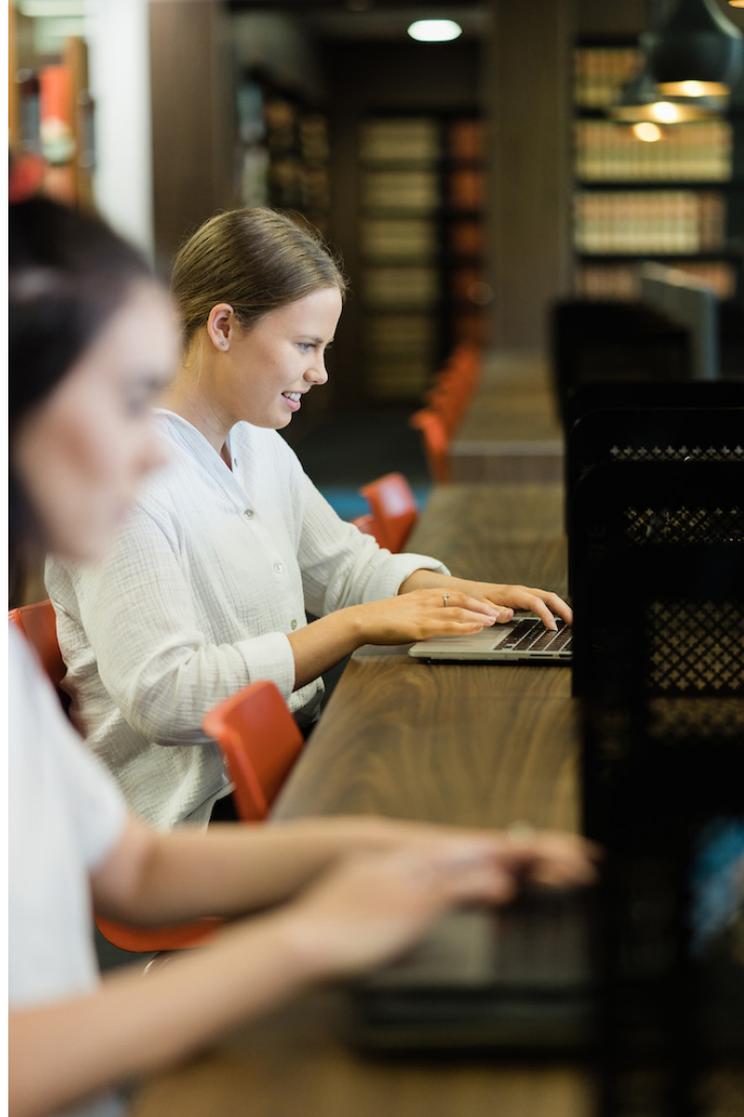
* Numbers shown are as instances recorded, prior to any investigation, or explanatory information being sought
c = cumulative total

Measures to assess effectiveness of anti-modern slavery actions – in use or in development

The following measures are aimed at assessing the effectiveness of anti-modern slavery measures and requirements, with respect to both Tier 1 suppliers and other suppliers further along the overall supply chain:

- inclusion of stipulated contract review meetings and measurement of performance against key performance indicators, in all significant ACU contracts
- self-reporting of suppliers against industry sector databases where they exist (eg. Sedex)
- use of third-party tools to investigate and assess anti modern slavery performance (eg. Sedex)
- use of ACU reporting tools to receive information about performance (eg. use of the ACU Tender Portal)
- receipt and assessment of supplier action plans designed to ensure modern slavery practices are avoided within the supply chains of Tier 1 suppliers
- establishment of auditing processes to verify compliance and performance by ACU and third-party auditors, including the review of audits initiated by suppliers.

These measures apply to all ACU campuses and operational personnel. The national and state managers are responsible for all of our campuses in Australia.



Criterion 6: **Process of consultation with entities owned or controlled**

ACU does not own or control any other entities and therefore this criterion is not applicable.

Criterion 7: Other relevant information

ACU'S THOMAS MORE LAW SCHOOL PRO BONO WORK

ACU continues to be proud of the pro bono work our law students are doing under the leadership of the Dean of the Thomas More Law School, Associate Professor Kunle Ola. The students continue to complete their pro bono placements with Domus 8.7 modern slavery remediation service.

To date, the collaboration has contributed more than 9,000 hours of review, analysis and ranking of statements submitted to the Australian Government's online Modern Slavery Statements Register.

In 2024, five ACU law students contributed to the Domus 8.7 Index. To date, ACU students have analysed more than 2,300 modern slavery statements (at an average of 11 pages per statement without graphics/other visuals included in page count).

During the 2024 intake, Domus 8.7 committee member and prominent modern slavery survivor advocate Moe Turaga, joined students undertaking their pro bono placements, sharing insights from his lived experience to encourage them in their learning.

SAINT JOSEPHINE BAKHITA, PATRON SAINT OF ACU BLACKTOWN CAMPUS – INAUGURAL LECTURE

"Alone, we may feel powerless about preventing modern slavery, but together, we can make a difference," Bishop Vincent Long OFM Conv, Bishop of Parramatta.

As we work to address the injustices inflicted upon the most vulnerable members of our communities, we draw inspiration from Saint Josephine Bakhita – the patron saint of our Saint Josephine Bakhita Campus in Blacktown, and patron saint of modern slavery victims and human trafficking, who was herself kidnapped and sold into slavery as a child.

On 8 February 2024, ACU's Blacktown Campus hosted the inaugural St Josephine Bakhita Lecture.

Bishop Vincent Long OFM Conv, Bishop of Parramatta, delivered the lecture, focussed on "... how we serve the most vulnerable, and break down divisions that undermine human dignity and solidarity of our communities".

ACU Blacktown Campus Dean Dr Valentine Mukuria said the inspiration for setting up the lecture series was to provide an opportunity to reflect on the values of St Josephine Bakhita.

Dean Mukuria stressed the importance of ACU, in partnership with other organisations, having a "mandate to look at people with all the dignity that comes from being children of God."

St Bakhita's life served as an example to ACU students in overcoming adversity and following the path of what we are called to do.

FACULTY OF EDUCATION AND ARTS ANTI-SLAVERY INITIATIVES

The below represents anti-slavery activities instigated by the Faculty of Education and Arts regarding integration into curriculum, teacher education and research.

ACTIVITY	DESCRIPTION
Integration into curriculum Initial Teacher Education	Anti-slavery awareness is engaged with in the unit TECH209 Textile Industries (TECH209 - Textile Industries (acu.edu.au)) in relation to allegations of the fashion and textile industry and regulatory measures. Representative resources are: Get The latest ethical fashion guide - Baptist World . And concepts like 'True Cost of Fashion'
Integration into curriculum Bachelor of International Development Studies; international development studies minor sequence	Anti-slavery awareness is engaged with in several units in international development. In particular the unit DVST200 Refugees and Forced Migration looks at the intersection between asylum/human trafficking.
Research	Dr Kristie Flannery's research explores urban women's experiences of migration, labour, and love between slavery and freedom in the early modern Indo-Pacific world. Conducting this research allows for a better understanding of the dynamics of modern slavery, with education being at the core of changing behaviour.
Supply chain research	As part of its Initial Teacher Education programs, ACU makes payments to schools and organisations in early childhood settings to support professional experience placements. The faculty is working with Finance and Planning to update our processes to ensure that we meet requirements for eradicating modern slavery in our procurement supply chain.

**Australian Catholic
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**Modern Slavery
Statement 2024**

