



**Upholding  
human dignity.**



**Leading with  
integrity.**

**Australian Catholic  
University**  
**2025 Modern  
Slavery Statement**

1 January – 31 December 2025

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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.

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# Statement from Vice-Chancellor and President Professor Zlatko Skrbis

Australian Catholic University is pleased to submit its sixth annual Modern Slavery Statement to the Australian Government as part of the 2025 Australian Catholic Anti-Slavery Network (ACAN) Compendium of Modern Slavery Statements. This Statement reflects ACU's enduring commitment, as a Catholic university, to upholding the inherent dignity of every person and to acting in solidarity with those most vulnerable to exploitation.

During the reporting period, ACU has continued to strengthen its approach to identifying, assessing and addressing modern slavery risks across

its operations and supply chains. Our risk management arrangements have been further embedded across the university, reinforcing our commitment to transparency, accountability and continuous improvement in line with both legislative expectations and our institutional values.

I commend the sustained efforts of ACU's modern slavery working group, whose leadership and diligence ensure that our response is not merely compliant, but purposeful and forward looking. Their work aligns closely with the strengthened national direction articulated by the Commonwealth Anti-Slavery Commissioner.

I am also pleased to have continued serving on the Advisory Committee of the Domus 8.7 Modern Slavery Remediation Service throughout the reporting period.

Through this Statement, ACU reaffirms its mission led commitment to ethical conduct, responsible stewardship and the pursuit of the common good. In doing so, we seek not only to strengthen our own practices, but to model the values we instil in our students as future leaders; values grounded in justice, compassion and a shared responsibility to eliminate modern slavery in all its forms.

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

As a Catholic university, we are guided by an unwavering commitment to the dignity of every person. This commitment calls us not only to speak about justice, but to act decisively in its pursuit.

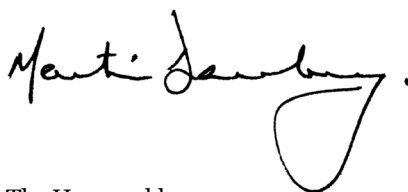
At ACU, we seek to form graduates who understand that leadership carries responsibility – to challenge injustice, to act with integrity, and to contribute meaningfully to a more

humane and equitable world. Our approach to governance and decision-making reflects this responsibility, demonstrating that ethical leadership is not abstract, but lived through the choices we make every day.

Modern slavery stands in direct opposition to the values we uphold. It is a profound violation of human dignity that demands sustained, collective action.

In this context, we reaffirm our commitment to transparency, accountability and continuous improvement, and to playing an active and principled role in the global effort to eradicate modern slavery. Through our actions, we aim not only to reduce risk within our own operations and supply chains, but to contribute to broader systemic change – in solidarity with those most vulnerable.

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 17 June 2026. 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: 17 June 2026



Professor Zlatko Skrbis  
Vice Chancellor and President  
Signed: 17 June 2026

# 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\*, and ranked first in Australia and sixth globally for good health and wellbeing (SDG 3)\*\*, 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 2025 annual consolidated revenue is \$703.7m.**

\* International Federation of Catholic Universities members ranked on Times Higher Education *World University Rankings 2026*

\*\* Times Higher Education *Impact Rankings 2025*, based on United Nations Sustainable Development Goals (SDGs)

\*\*\* *Graduate Outcomes Survey – Longitudinal 2024*, overall employment for domestic undergraduate students and domestic postgraduate coursework students in the labour force



## 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 and governance framework

ACU's annual modern slavery statements are compiled with contributions, information, figures and updates from across the University's directorates and faculties, as well as from external organisations such as Sedex, other ACU partners, and selected ACU suppliers. Consultation also takes place with the Australasian Universities Procurement Network (AUPN), the Australian Catholic Anti-Slavery Network (ACAN) and ACU's Eradicating Modern Slavery (EMS) Working Group.

The EMS Working Group is chaired by the Deputy Vice-Chancellor (Catholic 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 anti-modern slavery initiatives and annual statements are incorporated into ACU's governance structure. The statements undergo a stringent endorsement and approvals process, supported by clear governance and accountability arrangements. After compilation, statements are reviewed and endorsed by the Chief Financial Officer and Deputy Vice-Chancellor (Corporate), and then presented to the Vice Chancellor's Management Committee (VCMC). Once endorsement is received from VCMC, the statements proceed to ACU's Finance and Resources Committee for review and recommendation to ACU's Senate for its approval. The approved statement is then submitted to the Australian Government via the Australian Catholic Anti-Slavery Network (ACAN) Compendium and added on ACU's Eradicating Modern Slavery and Human Trafficking page.

ACU's 2025 organisational structure diagram, governance framework and governance structure diagram are provided below.

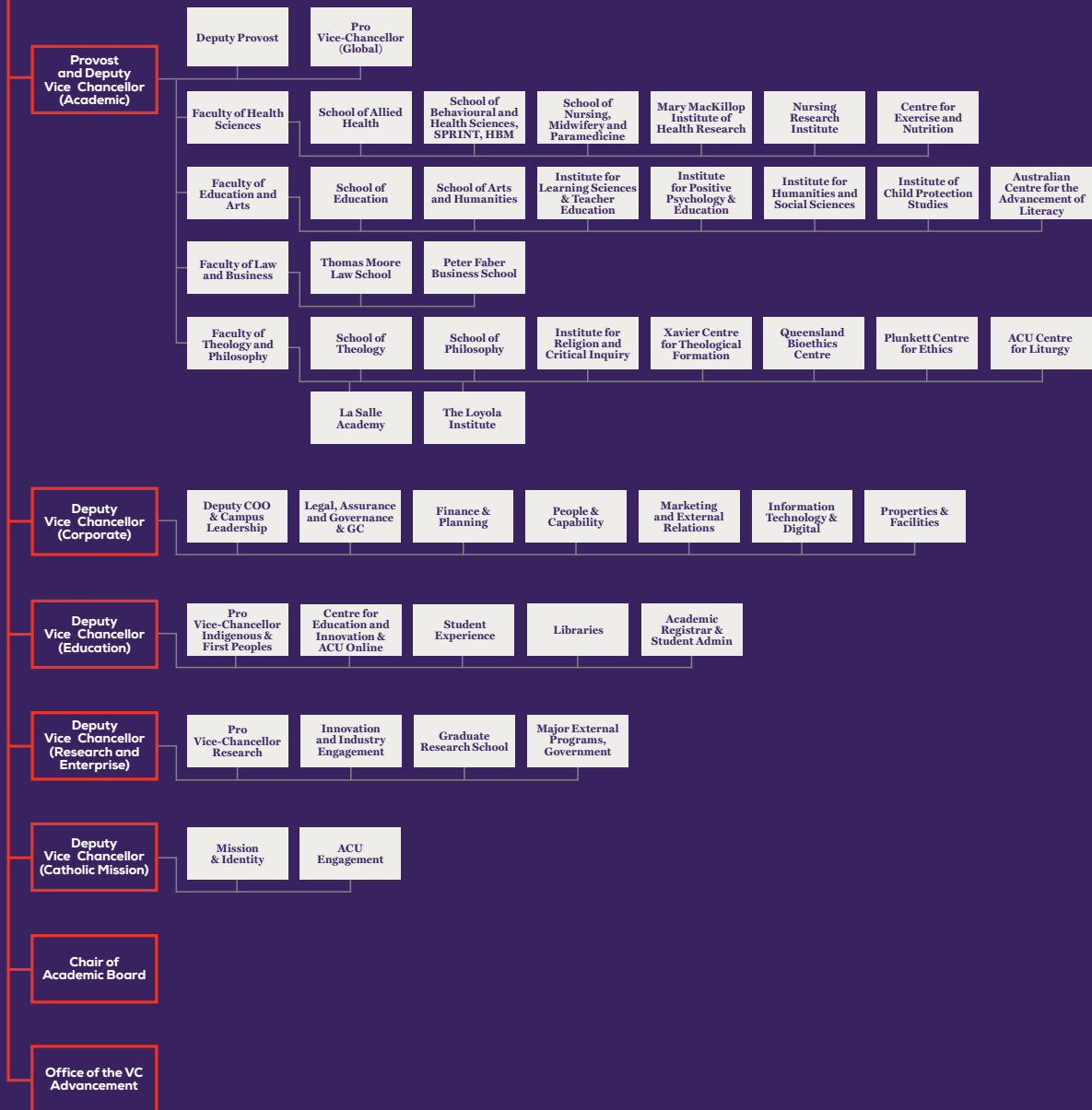


This diagram represents ACU's organisational structure at the end of 2025.

# Organisational Structure 2025



## Vice-Chancellor and President



## Our governance framework

Our key leaders and governance bodies are as follows:

### **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.

### **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.

### **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

### **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 and Deputy Vice-Chancellor (Academic) is responsible for the Academic Portfolio: ensuring academic quality is maintained, overseeing the faculties and providing the operational delivery of ACU's academic programs.

### **DEPUTY VICE-CHANCELLOR (CORPORATE)**

The Deputy Vice-Chancellor (Corporate) is responsible for the Corporate Portfolio ensuring the delivery of critical functions that enable the university to fulfil its mission and build the capabilities required for long-term growth and impact. This

portfolio covers a broad range of areas including people and capability, finance and planning, properties and facilities, information technology, legal assurance and governance, marketing and external relations, and campus leadership.

### **DEPUTY VICE-CHANCELLOR (EDUCATION)**

The Deputy Vice-Chancellor (Education) leads the Education Portfolio. Aligned with ACU's mission, the Education Portfolio makes a major contribution to the Catholic commitment to education. The portfolio prides itself on placing the whole person at the centre of its strategies and working to deliver the best possible experience and outcomes to our students. Student wellbeing and sense of belonging are key to the portfolio's engagement.

### **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.

### **DEPUTY VICE-CHANCELLOR (CATHOLIC MISSION)**

The Deputy Vice-Chancellor (Catholic Mission) is responsible for nurturing and advancing the university's Catholic mission and identity across the university. The Mission Portfolio seeks to enrich the university's academic and communal life by drawing on the Catholic intellectual tradition and promoting dialogue between Christian faith and contemporary culture.

### **THE ACADEMIC BOARD**

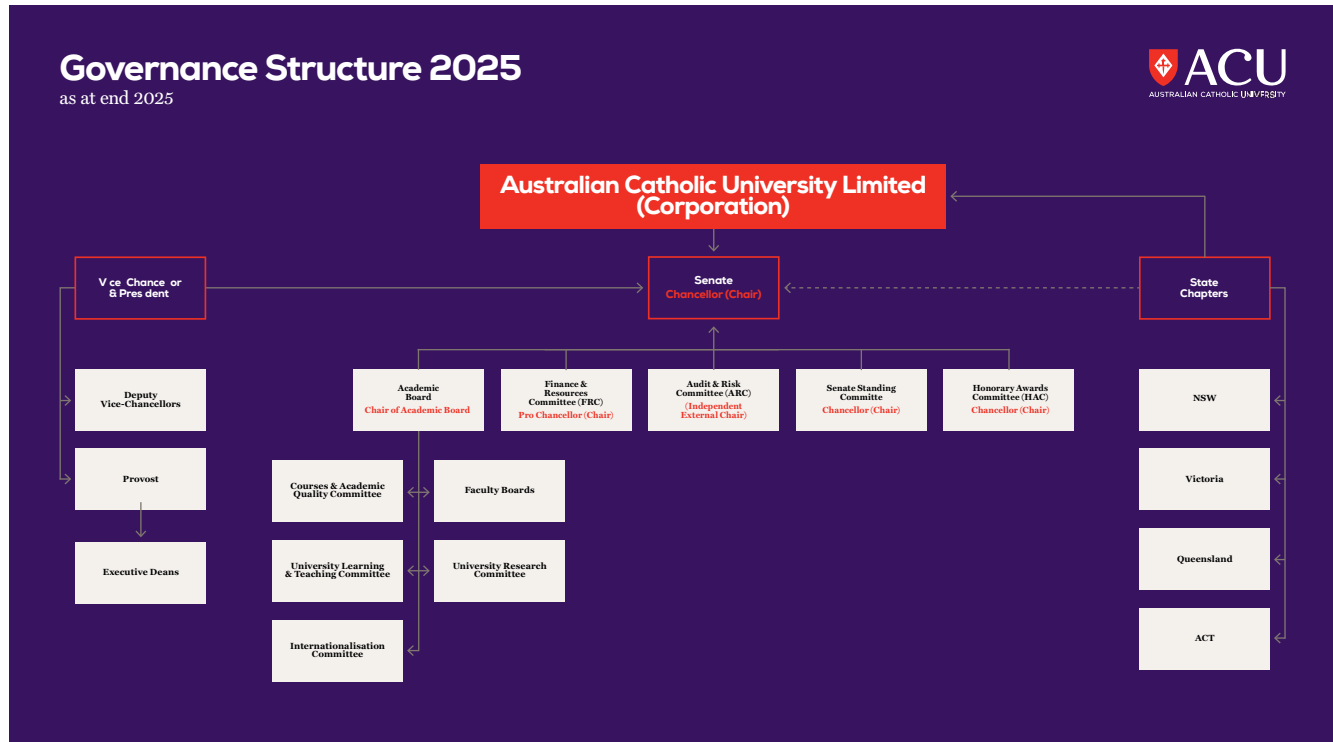
The Academic Board reports to the Senate and is responsible for all academic matters, including conducting quality assurance, developing academic policy, recommending new courses to the Senate and initiating course reviews.

### **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.

## ACU's governance structure

Below is a visual representation of ACU's governance structure as of the end of 2025. 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 – as well as 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 (2025):

- approximately 2,460 (FTE) staff
- approximately 35,100 students
- more than 152,000 alumni
- approximately 5,560 international students enrolled:

### International enrolments by region

|                            |       |
|----------------------------|-------|
| The Americas               | 154   |
| Europe                     | 175   |
| Africa and the Middle East | 412   |
| Asia Pacific               | 4,815 |

- more than 190 international partners (including research and cotutelle arrangements)
- 324 ACU students studied at our Rome Campus in 2025.



# 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](http://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. This helps ACU focus on high-risk activities.

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 standard 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 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.

## ACAN Modern Slavery Risk Taxonomy

For participating Catholic entities, modern slavery risks are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies severity of actual or potential harm to people (saliency) in spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery

- the Bureau of International Labor Affairs (ILAB), US Department of Labor
- the Global Child Forum and UNICEF.

Several key factors are also used to determine the level of risk:

- **geography:** the country or location where a good is made or service is delivered
- **industry:** the sector in which the making of goods or delivery of service occurred
- **commodity:** the raw materials or components that comprise the goods or products
- **workforce vulnerability:** such as bonded visas, temporary migrants, women or children known to be employed in specific industry sectors
- **Domus 8.7:** trends, cases and risk intelligence identified through the Domus 8.7 remediation service, including grievances and remediation insights relevant to category and risk to workers.



## Classification

| HIGH RISK                                    | MEDIUM RISK                                   | LOW RISK                |
|--|---|-------------------------|
| Cleaning and security                        | ICT software and network services – onshore   | Financial expenses      |
| Facility management and property maintenance | Fleet management, consumables and maintenance | License/membership fees |
| Food and catering services                   | Print/mail provider                           |                         |
| ICT hardware                                 |   |                         |
| Labour hire                                  |   |                         |
| Medical devices and supplies                 |   |                         |

Note: The following categories are not in scope of the ACAN Category Risk Taxonomy: Pastoral, Payroll (excluding labour-hire and sub-contracting)

## 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.

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

ACU undertakes a number of risk assessments including via platforms and tools developed by the AUPN and ACAN as elaborated on below and in other parts of this Statement. These platforms and tools help to inform ACU where attention may be directed to help address or mitigate modern slavery activities, in conjunction with other means.

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 2024, the 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.

For 2025, ACU submitted details of suppliers to the AUPN for uploading onto the ArcBlue Modern Slavery Dashboard. The dashboard has provided ACU with the opportunity to view the risks of modern slavery across suppliers servicing the tertiary education sector.

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.

As at the end of 2025, 18 universities from Australia and New Zealand are live on Sievo, with a number of other universities preparing to join in 2026.

ACU procurement staff attend regular Sievo University Procurement Analytics Service Champions forums to learn about the platform's functionality and features, and to share ideas with other university members.

Sievo is continuously improving the tool, based on user feedback and requirements, with some significant advancements rolled out in 2025 to improve classification of tail spend and parenting of suppliers.

These 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 for 2025 is \$703.7m, 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, just over 253 of these suppliers represent the top 80 per cent of spend. Based on an overall supplier expenditure of approximately \$169 million in 2025, the major categories that represent the top 80 per cent of spend are as follows:

| LEVEL 1 SPEND CATEGORY                         | 2025 APPROX SPEND (\$000S) |
|--|----------------------------|
| Information technology, equipment and services | \$25,557                   |
| Marketing and communication services           | \$12,100                   |
| Consulting services and contract research      | \$11,863                   |
| Facilities management                          | \$11,442                   |
| Building and construction                      | \$11,336                   |
| Student placements                             | \$10,366                   |
| Student recruitment, international             | \$9,298                    |
| Library books, systems and services            | \$8,294                    |
| Travel and accommodation                       | \$7,486                    |
| Utilities                                      | \$6,855                    |
| Cleaning                                       | \$5,605                    |
| Rent   | \$3,946                    |
| Security services                              | \$3,742                    |
| Other office and workplace supplies            | \$3,163                    |
| Insurance premiums                             | \$2,632                    |
| Plant and equipment                            | \$2,141                    |

\* ACU Annual Report 2025

## 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 could be regarded as representing some type of modern slavery risk. The university, through our Finance and Planning Directorate, also engages in investment activities.

ACU's finance system uses the AUPN spend categorisation system to logically group the variety of goods and services procured across ACU to meet our many operational demands. Goods and services are sourced from the following range of categories, this list having 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, printers 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 Aboriginal and/or Torres Strait Islander suppliers, who may nevertheless source some of the items from overseas manufacturers.



## Modern slavery risks in investments

ACU has approximately \$33.2 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 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.

**Refer to Criterion 4: Actions taken - modern slavery risks in investments.**

## Modern slavery risks to students

Students and young people are at a much higher risk of experiencing modern slavery, with international students being the most vulnerable. International students face heightened risks of modern slavery due to factors such as limited English proficiency, reduced local support networks, financial pressures, and unfamiliarity with Australian workplace and tenancy laws. These vulnerabilities can expose students to deceptive recruitment practices, debt bondage, exploitative work conditions and unsafe housing. ACU continues to monitor these risks, particularly those associated with the conduct of overseas education agents, who play a central role in student recruitment.

ACU currently works with 207 registered international education agents, with significant offshore recruitment activity expected to continue over the next five years. While the university maintains strong contractual oversight of these agents, private arrangements between agents, families and prospective students in source countries remain difficult to monitor and continue to represent a material area of modern slavery risk.

**Refer to Criterion 4: Actions taken - modern slavery risks to students.**

# Criterion 4:

## Actions to assess and address risk

### Summary of actions taken to date – ongoing and in progress

Below is a summary of actions taken by ACU to date. Many 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 six 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.
  - Engagement of specialist modern slavery supplier compliance resource throughout the 2025 reporting year (see section directly below).
  - 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.
  - 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 short modern slavery questionnaire which must be completed by each new supplier prior to onboarding into our finance system. Along with collecting basic supplier information, the form also raises supplier awareness about both modern slavery and ACU's commitment to it.
  - Continuing enrolment of all identified ACU staff in the online training programs developed by ACAN on the broad requirements of anti-slavery measures and activities, with the training continuing to be available to all staff.
  - Continuing use of the toolsets created by both ACAN and the AUPN to gather information about modern slavery, anti-modern slavery activity and legislative requirements.
  - Engagement with ACU's national and state-based managers to reinforce their role and obligations regarding anti-modern slavery measures when making purchasing decisions.
  - In line with ACAN's measurement tool recommendations (originally a GAP analysis, then last year a maturity assessment with its associated scoring, and this year via ACU's completed and regularly updated Sedex Self-Assessment Questionnaire (SAQ)) continue the use of an assessment to monitor continuous improvement across ACU's operations and any impacted areas of ACU.
  - To continue the engagement with key suppliers in areas of high risk, including via deep dive reviews into selected Tier 1 and Tier 2 ACU suppliers.
  - 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.
  - Ongoing staff training, familiarisation with and utilisation of the Sievo procurement analytics platform, which facilitates easy visibility into purchasing patterns, standardises supplier data classification across participating universities, and strengthens risk assessments across our supply chain – this includes ACU procurement staff attendance at regular University Procurement Analytics Service Champions forums to gain and share knowledge, including around suggestions to improve the platform.
  - Continuing to work with our eMarketplace administrator to facilitate network suppliers' ability to tag their own sustainable catalogue products and their modern slavery compliance.
- Specific actions to address modern slavery risk taken by the University are expanded upon in the following section, which includes individual ACU focus area actions and updates, and supplier case studies.

## Actions taken – Engagement of specialist modern slavery supplier compliance resource

At the commencement of the reporting period, ACU secured the support of a modern slavery specialist to be embedded in the Finance and Planning team. 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. The specialist resource:

- assessed modern slavery risk and due diligence of high-risk suppliers and examined Tier 2 of ACU's supply chain for those suppliers
- devised case studies (including the medical gloves category and property management suppliers) and the Electronics Watch Pilot Program article, and other content for this statement
- contributed and shared information via attendance at regular ACAN and AUPN meetings
- identified opportunities for collaboration with other teams across ACU to manage modern slavery risks
- coordinated ACU's submission of supplier details to the Electronics Watch Pilot Program and ongoing monitoring of the project
- conducted an initial assessment of Tier 2 of the supply chain focused on the top 20 highest modern slavery risk suppliers
- assessed the modern slavery risk management and governance mechanisms in the top 20 high-risk suppliers and top 20 suppliers by spend
- completed ACU's Sedex Self-Assessment Questionnaire (SAQ)
- prepared ACU supplier spend spreadsheets for the 2025 reporting period and submitted those to ACAN and the AUPN.
- collaborated with ACAN to onboard ACU's top 20 highest risk suppliers and top 20 highest spend suppliers to Sedex via a jointly branded email to suppliers inviting them to complete ACAN's Modern Slavery Supplier Survey and commence the onboarding process with Sedex. This initiative was part of a continuing effort to increase the number of ACU suppliers on Sedex and in the ACAN supplier database, for visibility of our suppliers' compliance maturity and their supply chains.

## Actions taken – Our supply chain

### MAPPING THE TIER 2 SUPPLIERS AMONG OUR TOP 20 HIGH-RISK SUPPLIERS

A desktop mapping exercise was conducted on ACU's top 20 spend/high-risk suppliers from the 2024 Modern Slavery Statement. The aim was to identify some of the tier 2 suppliers to assess any modern slavery risk in that tier. Tier 2 suppliers were identified through invoices on ACU's finance system and details on the suppliers' websites.

The exercise indicated the modern slavery risks in place in Tier 2 of the supply chain and some of the measures in place to mitigate these risks.

It was clear from the initial analysis of Tier 2 that some suppliers had no publicly available policies or modern slavery

risk mitigation strategies available. Other Tier 2 suppliers had very robust measures in place to address modern slavery risks. Increased risks also identified in Tier 2 were associated with countries products were sourced from, sub-contracted labour in high-risk countries and high-risk professions (cleaning and security in particular), and the source of critical minerals used in the manufacture of goods.

The mapping of Tier 2 suppliers is an important initial step in gaining visibility of modern slavery risks in the ACU supply chain. The next step, to follow up with identified suppliers, will be undertaken in the next reporting period.

**ACAN-PRODUCED ACU SUPPLIER ANALYSIS**

ACAN generated the below ACU supplier information graphics – which detail ACU supplier engagement and supplier sourcing locations.

**Supplier Engagement Overview**

ACAN Entity File  
 ENTR-2 | Australian Catholic University (ACU)

Total suppliers

**3,363**

Suppliers in High Risk procurement categories

**1,362**

ACAN Supplier Surveys completed

**492**

ACAN Supplier Surveys completed in 2025

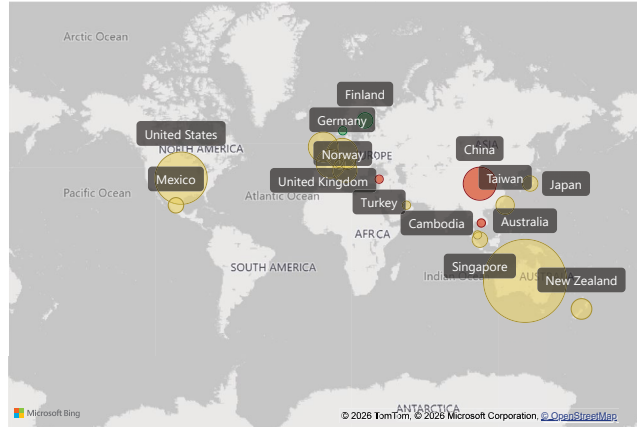
**297**

Suppliers identified for Sedex Onboarding

**98**

**Sourcing Countries for Tier 1 Suppliers**

Overall inherent risk cate... ● high ● low ● medium



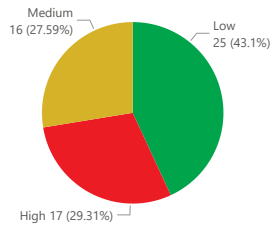
**Supplier Screening - ACAN Collated**

|                                       |   |
|---------------------------------------|---|
| Enhanced 3rd Party Supplier Screening | 3rd Party Supplier Screening - High and Medium Risk |
| <b>529</b>                            | <b>25</b>   |

Suppliers on Sedex      SAQs Completed

**75**                      **51**

Sedex SAQ Risk Category



Supplier e-mail shared

**1750**

Supplier Communication

**5444**

Suppliers completing e-learning

**17**

Audits in 2025

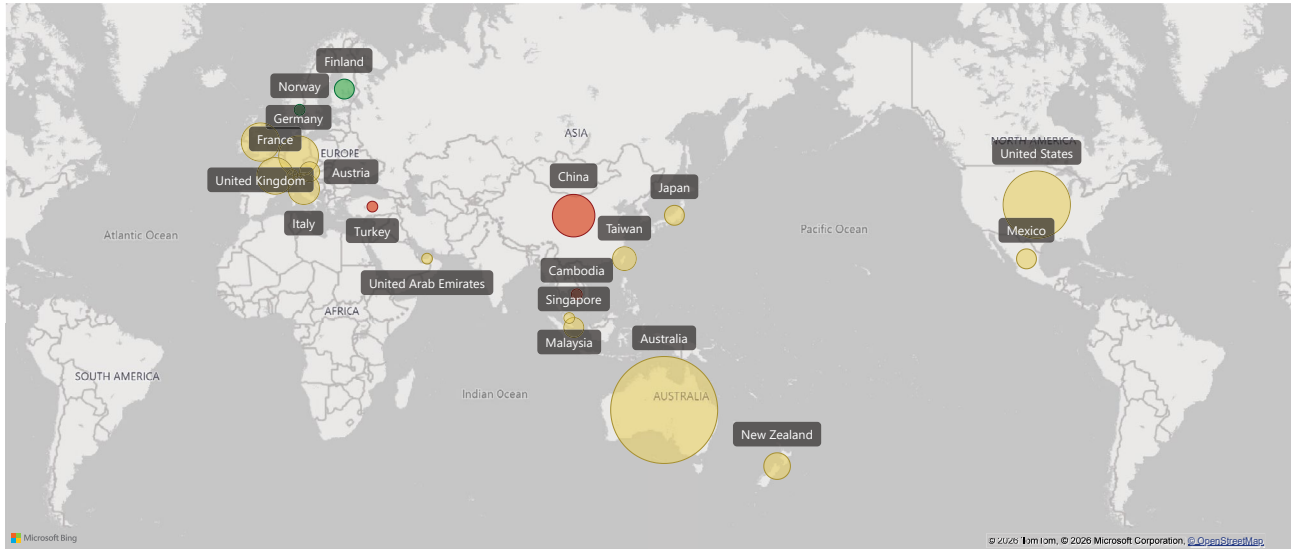
**3**

Audits Findings in 2025

**32**

**Sourcing Countries for Tier 1 Suppliers**

Overall inherent risk category ● high ● low ● medium



Note: Supplier spend may vary between ACAN and ACU due to 'not in scope' suppliers such as Catholic organisations.



## Actions taken – 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.

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.

ACU has robust mechanisms to receive complaints relating to staff conduct and behaviour, risks to health and safety, 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

**Our People Plan 2025-2030** is currently being finalised, and sets out a refreshed suite of key strategic objectives in support of ACU's mission and strategic priorities. These include building leadership capability, enhancing the safety and wellbeing of our staff, and enhancing staff development within a culture of inclusion and belonging.

ACU is engaged in Enterprise Bargaining with staff representative unions for a new ACU Enterprise Agreement. Bargaining commenced in mid-2025 and the University is hopeful of having a new Enterprise Agreement approved by the Fair Work Commission by mid-2026.

A significant implementation program of work will follow to inform and educate staff around key enterprise agreement and policy changes and requirements.

ACU is committed to ensuring that all staff are remunerated based on a classification methodology that is fair, transparent, and equitable. In 2023, the University identified inaccuracies regarding entitlements for certain casual and sessional academic staff. Throughout 2024 and 2025, ACU has worked to remediate these issues, which has included making correction payments to both current and former staff. This program of work continues into 2026 with the broader review of employee entitlements to identify and resolve any further inaccuracies. Additionally, enhanced governance and controls are being implemented to provide greater visibility over workforce data and ensure these errors do not reoccur.

## Actions taken – Properties and Facilities

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

- Since its inception, contributing to, actively participating in and sharing learnings from ACU's Eradicating Modern Slavery Working Group via a Properties and Facilities member representative.
- Ensuring all national tenders have a mandatory Q&A field around modern slavery 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; level two is the Tier 1 supplier (ie the engaged service provider); level three is 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 staff member 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.

If this information cannot be provided directly by the vendor's personnel, ACU will verify the information by audit or other validation processes.

### ROBUST NATIONAL CLEANING AND SECURITY AGREEMENTS

In 2024, ACU's Properties and Facilities Directorate finalised two important tender projects. Each of these was 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 the following actions:

- 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 business in a manner consistent with the principles of the Modern Slavery Act, and ensure 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 their business's own contractor agents, contractors and other participants to ensure that there is no modern slavery in its supply chains. These procedures are to be documented in any annual modern slavery statements prepared by the respective organisations (as below).

- When requested, 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: "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, as may be requested, are to be reviewed by ACU, and, where indicated, appropriate recommendations are made to the supplier for future improvements, adjustments or corrective action.
- 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."

In line with this expectation, ACU engaged an independent auditor in August 2025 to undertake a payroll audit of the security and cleaning services companies. A similar audit will be undertaken in 2026 and 2027. The 2025 audit findings were considered not material to the terms of the contract and were considered addressable through a minor broadening of the terms of the 2026 September payroll audit.

The security and cleaning companies are also required to provide monthly declarations that staff and subcontractors are remunerated in accordance with respective award requirements.

## Actions taken – IT hardware

### ACU MULTI-CAMPUS AUDIOVISUAL FITOUT RISK IDENTIFIED AND ADDRESSED

During 2025, ACU embarked on an extensive audiovisual fitout across its campuses nationally. We conducted due diligence on new electronics suppliers to identify any modern slavery risks in their supply chains.

One well-known supplier of audiovisual equipment was replaced by the ACU project team due to the publicised

exploitation of its workers making plastic moulds in Malaysia.

A broader review of all audiovisual componentry, looking at modern slavery and other risks, is planned to be undertaken in the next reporting period.

### ELECTRONICS WATCH PILOT PROJECT AND ACU'S IT HARDWARE SUPPLY CHAIN

During 2025, ACU was invited by the AUPN to participate in the joint Electronics Watch Pilot Program. The program included Higher Ed Services (HES), Electronics Watch and multiple Australian universities through their membership of the AUPN.

As the leading international body monitoring and identifying worker exploitation in public procurement electronics supply chains, Electronics Watch provided unique insight into worker conditions.

Electronics Watch identified three of the IT products ACU was buying from two companies as being of potential concern. The ACU suppliers in question were contacted directly for details on the products and the factories in which they were produced. One supplier was the manufacturer of the products, the other an Australian reseller. Both ACU Tier 1 suppliers complied with ACU's request for details on behalf of Electronics Watch.

One supplier had discontinued the product model and was no longer using the factory and provided details of the countries involved in their supply chain. The other supplier, the manufacturer of products, would only release details if ACU signed a non-disclosure agreement. This was for commercial reasons related to competition and business-sensitive information.

Electronics Watch provided ACU with monitoring reports from Quarters 3 and 4 of 2024 and Quarters 1 and 2 of 2025, in relation to the specific products ACU had enquired about.

Due to confidentiality restrictions, the exact details of violations of worker rights cannot be disclosed. They related to excessive overtime, underpayment of overtime rates and age discrimination. Factories located in China and Malaysia were the subject of the violations. In each case, the manufacturer engaged in dialogue with workers and their representatives to improve conditions.

Reports provided by Electronics Watch to ACU showed that the suppliers in question had engaged in dialogue with workers and the factory management in order to address violations.

From this due diligence project, ACU learnt that:

- IT suppliers were responsive to requests for supply chain information
- business sensitive and competition related details could not be shared with third parties, but could be used by ACU
- suppliers had engaged in discussions with affected workers in factories in China and Malaysia
- the risk of worker exploitation in IT supply chains is a reality
- Electronics Watch had monitored several of the factories and mines involved in the manufacture of the final product, but it had limited capacity to verify whether issues had been resolved.

## Actions taken – procurement processes, systems and documentation

### ACU PROCUREMENT POLICY

Supplier engagement is in accordance with the ACU Procurement Policy, which is regularly updated. It underwent substantial revision in 2022 and 2024, with further sustainability-commitment related wording added in 2025. 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 which stated 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:

- conduct their businesses in a manner that is consistent with the principles of the Modern Slavery Act and
- 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. This 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.

In 2025, at the request of the EMS Group Chair, a clause was added into the Procurement Policy which outlined ACU's commitment to sustainability and its alignment to Laudato si' principles:

“ACU's deep commitment to sustainability is informed by, and aligns with, Pope Francis' encyclical, Laudato si': On the care for our common home. Laudato si' articulates the indivisible link between caring for each other and caring for our common home. Under this commitment, ACU staff purchasers are encouraged to consider where possible buying

goods and services with a low environmental impact and a high, positive social impact (to be considered alongside primary buying considerations such as value for money and quality etc). This may equate practically to buying goods and services from suppliers that, for example (and not limited to), take actions to:

- minimise their carbon emissions;
- use recycled materials;
- produce recyclable products;
- meet or exceed regulations to eliminate modern slavery in supply chains; and
- support Indigenous businesses.”

## **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 (TAC) 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 criterion is scored by evaluators and forms part of the supplier's overall score. 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 use a hosted tender portal arrangement.

## **EMARKETPLACE PURCHASING CATALOGUE**

The ACU eMarketplace catalogue displays products from a range of different suppliers which can be selected by staff using ACU's online Finance 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.

## Actions taken – Modern slavery staff training (including new module and updated existing modules and processes)

In mid-2025, ACAN provided to ACU updated, shorter, streamlined and more user-friendly training modules. A third new module, Grievance and Remedy, was added to the two existing modules, to be undertaken by certain identified staff and the members of ACU's Eradicating Modern Slavery (EMS) Working Group.

All ACU staff have access to the online training program modules developed by ACAN to educate them on the broad requirements of anti-slavery measures and activities for their roles.

All staff members involved in purchasing and procurement decision-making are required to undertake the required ACAN modern slavery training modules. These modules are available to all ACU staff via the staff learning hub. This provides further opportunity for them to undertake this training as part of any professional development they may identify.

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

- 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.

As of 31 December 2025, 787 staff or 70 per cent of those enrolled (including directors and managers) had completed the two introductory modules, Modern Slavery 101 and Business Relevance.

A further 22 staff have completed the new third specific role-required module, Grievance and Remedy.

ACU's People and Capability Directorate continue to monitor and review processes regarding enrolment into the modern slavery training modules, to improve completion rates and outcomes.

There was significantly higher engagement in 2025 than in previous years, with 327 staff completing both module one and module two. In addition to the updated modules, a key driver of increased participation in 2025 has been process improvements made by the Learning and Development team, including building into business as usual the follow up of those staff who show as non-complete.

## Actions taken – ACU membership and benefits of key affiliated external and internal associations and groups (with staff and/or executive attendance at regular meetings)

### ACAN ANTI-MODERN SLAVERY WORKING GROUP

In 2025, ACAN provided 11 monthly webinars to ACU and five supplementary open-forum sessions. ACAN's Modern Slavery Risk Management Program continued to offer access to the Supplier Ethical Data Exchange platform (Sedex) and a bespoke platform (Rota) that houses ACAN tools and resources. Rota also provides access to site-based grievance channels and other remediation resources. The ACAN program includes access to the Domus 8.7 Modern Slavery Remediation Service. Domus 8.7 launched a 24/7 worker care

line and multilingual outreach materials available for use on ACAN member sites. ACAN continued to represent ACU and Catholic organisations on the Australian Government's Modern Slavery Act Expert Advisory Group and National Roundtable on People Trafficking and Slavery. Submissions, consultations and engagement with the Modern Slavery Act Review, Australian Anti-slavery Commissioner and Office of the NSW Anti-slavery Commissioner have also continued. ACU's supplier engagement program is expanded upon below.

### ACU'S ACAN SUPPLIER ENGAGEMENT PROGRAM

ACAN provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. In 2025, the ACAN Modern Slavery Risk Management Program launched a new purpose-built data management platform – ROTA. ROTA centralises the ACAN Modern Slavery Risk Management Program framework and facilitates supplier performance evaluation and engagement.

ACAN supports ACU's modern slavery program, providing access to the following features and services:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy.
2. ACAN Supplier Survey to identify supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status.
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance mechanisms and remediation.
4. Onboarding suppliers to Sedex, which requires a business address, contact details and goods or services provided.

5. The Sedex SAQ, which helps suppliers evaluate their practices against established standards and identify areas for improvement.
6. Desktop reviews to identify key actions required from suppliers.
7. Enhance supplier screening using Know Your Client (KYC) intelligence software.
8. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.
9. Domus 8.7 Index modern slavery statement assessment on selected suppliers in high-risk categories.
10. ACAN Prequalified Supplier Directory – a list of preferred suppliers accessible to Catholic organisations.

## SEDEX MEMBERSHIP - 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, as per ACAN's modern slavery program guidance, ACU joined Sedex and commenced supplier onboarding in collaboration with ACAN. We initially invited 49 high-risk ACU suppliers to join Sedex, requesting they complete a detailed self-assessment questionnaire about their organisation (SAQ), 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 2025, 89 ACU suppliers are on Sedex (this number includes suppliers not procured from in 2025) with 492 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 ongoing assistance to coordinate the following:

- supplier invitations to webinars and pre-assessment questionnaires
- 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.

ACU continues to increase its use of ACAN-related services, including supplier base analysis and the resulting further onboarding of suppliers to Sedex.

In 2025, Sedex launched a forced labour tool as part of the service available to ACU. The tool draws on non-compliance and observations raised during audits at supplier sites to identify common signs or 'clues' that point to the possible existence of forced labour within a supply chain. The number of indicators – which are based on research by the International Labour Organisation (ILO) – identified at specific sites are categorised and weighted to calculate a site's audit indicator score.

ACU procurement staff participate in regular joint ACAN and Sedex supplier briefings and educational sessions regarding supplier due diligence and modern slavery risk management. In 2025, staff attended a joint ACAN and Sedex presentation on the Sedex Self-Assessment Questionnaire (SAQ). Sedex provided details on the use of the SAQ to identify areas for improvement across an organisation's policies and procedures.

Procurement staff also participate regularly in Sedex half-day in-person member roundtable discussions. These events bring together representatives from national and international organisations across a range of different industries to workshop collaborative strategies to identify, manage and remediate modern slavery risks. The participants workshop program approaches, learnings and common challenges.

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

## AUPN MODERN SLAVERY WORKING GROUP ANTI-SLAVERY FORUM

The AUPN modern slavery program is a higher education sector-wide initiative involving 41 universities across Australia and New Zealand. The program leverages the group's collective spend and market influence as well as expertise to maximise purchasing power, drive ethical procurement and ensure compliance with the Modern Slavery Act. In 2025, nine dedicated forum meetings brought together expert speakers, survivor advocates and

procurement professionals to discuss topics such as ethical apparel procurement and risk identification tools. Meetings featured a range of informative presentations, including those by Electronics Watch, Australian Catholic Religious Against Trafficking in Humans (ACRATH), Etiko Clothing, and the University of Sydney's Student Modern Slavery Ambassador, with participating universities generously sharing their approach to managing modern slavery risk.

## ACU'S ERADICATING MODERN SLAVERY (EMS) WORKING GROUP

Established towards the end of 2020, the group comprises members of the ACU senior executive, other key ACU personnel and representatives from the Catholic Archdiocese of Sydney's Anti-Slavery Taskforce. Since its inception, the group was chaired enthusiastically by the Vice-President and Director of Mission, who left the university in early 2025. The Chair role was taken up again towards the end of 2025 by the new Deputy Vice-Chancellor (Catholic Mission). Consequently, only one EMS Working Group meeting was held in 2025.

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 its commencement, 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.

Moving forward, the EMS 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 include modern slavery 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.

## DOMUS 8.7 REMEDIATION PROGRAM

ACU is a founding member of Domus 8.7. Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020 as a key element of the ACAN Modern Slavery Risk Management Program. This collaborative approach to remediation is aligned with the Modern Slavery Act and Catholic social teaching, which are centred on the needs, wellbeing and empowerment of people impacted.

Domus 8.7 provides ACU with:

- resources that enable us to listen to workers (a grievance channel)
- a 24/7 careline for workers on our sites, staffed by professional counsellors
- direct support to people impacted by modern slavery
- guidance and technical assistance to prevent, identify and remediate modern slavery
- a documented process to assess if an organisation has caused, contributed or is directly linked to modern slavery and modern slavery indicators.

Domus 8.7 empowers people impacted by modern slavery to have choice and control over what forms of remediation are meaningful to them and to engage safely with business/supply chain actors. Supports may include:

- modern slavery indicator assessment
- needs assessment, case coordination, response and remediation planning
- referrals to community, social services, unions
- transport, accommodation, financial and food support
- legal support, referrals, accompaniment and advocacy
- job training, retraining and redeployment
- accompaniment and advocacy to engage with government and law enforcement agencies
- opportunities to contribute lived expertise to improve modern slavery responses.

The Domus 8.7 Advisory Committee Members include a person with lived expertise, Mr Moe Turaga, and ACU's Vice-Chancellor.

## Actions taken – Modern slavery risks to students

### STUDENTS – INTERNATIONAL

In 2023, ACU strengthened the modern slavery clause within its Education Agent Agreements, requiring all agents to comply with relevant legislation, embed due diligence processes, assess risk across their operations and supply chains, and report any suspected instances of modern slavery.

In 2025, these strengthened obligations were reaffirmed and applied across all new and renewing Education Agent Agreements. The current agreement framework contains an expanded and modernised suite of compliance and behavioural requirements, far exceeding the earlier clause structure, and reinforces expectations relating to ethical and transparent recruitment, accurate information provision, agent conduct and compliance with the ESOS Act and National Code (including Standards 4 and 6).

ACU also uses student feedback to monitor agent behaviour. Enhanced onboarding surveys introduced in 2024 – 2025 include targeted questions about students' experiences with their education agents, supporting both TEQSA and National Code compliance and enabling early detection of concerning

patterns.

To reduce vulnerability to workplace exploitation after arrival, ACU provides every commencing international student cohort with information on Australian work rights, developed in partnership with ACU Careers and Employability. This includes guidance on minimum wage, working hours, conditions of employment and the role of the Fair Work Ombudsman. Students can also access counselling, wellbeing support, legal advice and dedicated international student advisors if they have concerns about exploitation, recruitment practices or unsafe arrangements.

ACU's commitment to student safety, wellbeing and ethical recruitment continues to be recognised at the national level. In 2025, the university was ranked fourth in Australia for international undergraduate student support and services experience, with satisfaction rising from 83.8 per cent in 2023 to 87.9 per cent in 2024, according to QILT. This result demonstrates the effectiveness of ACU's support systems, including those aimed at mitigating modern slavery risks.

#### Sector engagement and collaboration – ACU attends International Students Modern Slavery Risks Roundtable

In September 2025, ACU attended and participated in the International Students Modern Slavery Risks Roundtable, hosted by the University of Sydney. ACU was represented by the Associate Director, International Admissions and Compliance, and the Senior International Student Advisor.

The roundtable brought together Australian universities, specialist organisations and frontline

agencies to examine emerging modern slavery risks affecting international students, including:

- deceptive or coercive recruitment practices
- fraudulent job offers and job scams
- exploitative or unsafe work conditions
- vulnerabilities linked to

visa pressures and financial dependence.

The learnings from the roundtable are being incorporated into ACU's student communications, agent management practices, and internal procedures for identifying and responding to modern slavery risks, further strengthening ACU's institutional approach to prevention and early intervention.

### STUDENTS – GENERAL

The Student Experience Directorate maintains robust systems and procedures to ensure adherence to ethical work practices. As part of this commitment, the directorate reviews all suppliers of equipment, merchandise and services to verify compliance with modern slavery policies, statements, certifications and ethical standards. Preference is given to suppliers demonstrating strong ethical practices and transparent governance.

The directorate ensures that all staff have completed the appropriate ACAN modern slavery training modules.

All students at ACU, including international students, have access to these free, confidential services:

- Counselling 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.

- Two 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 were well-prepared to offer fair work support and advice and correct and current information during appointments with students. This training will continue annually. The team developed a dedicated workshop and a suite of tailored

resources, available on the CareerHub platform, to educate students and graduates about the Fair Work Act and workplace rights. These materials address issues such as exploitation, breaches of fair work practices, and guidance on responding to misconduct observed during placements or employment.

All staff and participants involved in student activities have designated breaks built into event schedules to ensure no one is required to work beyond reasonable limits.

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 gender-based violence – including sexual behaviour and/or sexual violence – which may be illegal, inappropriate, threatening or concerning (including situations related to modern slavery).

Students can access the service by:

- submitting an online reporting form: Safeguarding and Incident Reporting
- talking to a Safety Support Officer, a trusted member of staff, an ACU counsellor or the Safeguarding and Student Safety team
- calling Safeguarding and Student Safety on 0476 852 735
- emailing [respectandsafety@acu.edu.au](mailto:respectandsafety@acu.edu.au)
- calling the ACU National Security Centre on 1300 729 452 (should a student require immediate assistance).

The Safeguarding and Student Safety team can provide trauma informed and victim-centred support to students who have experienced gender-based violence (including incidences of modern slavery). Support is individualised, tailored to the specific situation and person's need. This support may include (but is not limited to) providing:

- referrals to internal ACU services, including counselling, a 24-hour mental health support line and legal advice sessions, as well as assistance with accommodation/housing/hardship grants
- referrals to external specialist services to support the student's needs and care plan
- special consideration forms for academic adjustments and extensions
- assistance with reporting options both internally at ACU and externally to the police
- education and awareness to help address concerning behaviours and drivers of gender-based violence to support safety on campus
- safety planning and welfare checks.

To date, the team has not had to manage a modern slavery disclosure or report; however, it is prepared to manage such matters if and when they arise.

## Actions taken – Modern slavery risks in investments

As an investor, ACU aims to ensure that modern slavery occurs neither in the companies in which we invest nor 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.

The Investment Strategy Group (ISG) at JBWere (refer Criterion 3 'Modern Slavery Risks in Investments') published their **Responsible Investment Policy** in May 2024, which outlines their responsible investment (RI) approach and framework. JBWere considers modern slavery as part of the 'S' for social risks, and it represents a material risk from an investment perspective. JBWere believes failure to consider modern slavery risk as part of the ESG factors in a company's operations or supply chain can present potential negative financial impacts through reputation damage, litigation and operational risks which may harm a company's social license to operate. JBWere approaches risks arising from modern slavery in a similar way to other ESG and investment risks. The NAB Group publishes annually a joint Modern Slavery and Human Trafficking Statement on behalf of NAB Group entities which includes JBWere. **[View the NAB 2025 Modern Slavery and Human Trafficking Statement.](#)**

JBWere manages modern slavery-related risk across a range of asset classes:

- **Equities:** The JBWere equity research and selection process includes an assessment of modern slavery risk when reviewing candidate stocks. The JBWere equities modern slavery risk assessment process includes a review of each potential investee company's Modern Slavery Statement (where this exists), or other corporate disclosures related to corporate governance, human rights and/or labour relations. Where no primary source Modern Slavery Statement is available, the process utilises MSCI ESG scores associated with labour relations and a review of MSCI ESG controversies data for evidence of increased modern slavery risk.
- **Fixed income:** For JBWere, certain modern slavery risks are captured in an issuer's MSCI ESG score and issuer credit rating. The team also monitors modern slavery risks through debt investor updates and leverages the credit ratings and analysis of recognised rating agencies such as S&P Global and Moody's. The identification and assessment of the ESG factors relevant to a debt issuer feeds directly into any recommendation for a JBWere client to buy, hold or sell a bond or hybrid issued by an issuer. In addition, the assessment of modern slavery risks as part of the broader ESG risk assessment relevant to a particular debt issuer also has a direct bearing on the value JBWere assigns to any debt instrument of that issuer.



## Actions taken – Supplier case studies

### CASE STUDY

#### ANALYSIS OF MEDICAL GLOVE SUPPLIERS – AND SUBSEQUENT SECTOR-WIDE AUPN GLOVE PROJECT

The disposable medical glove industry represents a high risk of modern slavery across its entire supply chain. This includes the farming of raw materials, the production of synthetics, the production of ceramic glove moulds and the production of the gloves themselves.

ACU relies on a supply of medical gloves for nursing and allied health courses and for PPE across the university.

An examination in 2025 of two of the glove manufacturers in the ACU supply chain identified historical and current instances of modern slavery and labour exploitation in Malaysia.

ACU has used two local medical supply companies to source gloves from manufacturers. Two of the manufacturers supplying the gloves have had cases of alleged modern slavery in their supply chain. One glove manufacturer is a multinational company with operations in Malaysia, the other manufacturer is an Australian company with operations in Malaysia.

Both of ACU's suppliers sourced their gloves from a Malaysian-based multinational supplier and manufacturer. Allegations of forced labour and excessive recruitment fees were made against this Malaysian company in 2021. The company engaged in a remediation program, paying current and former employees a total of 45.5 million Malaysian Ringgit (AU\$16,000,000).

This manufacturer now has a Zero Recruitment Fee policy; however, they have no way of enforcing that on recruitment agencies in Nepal, Bangladesh or Myanmar, their main sources of migrant labour.

ACU was supplied with gloves during the period leading up to, and including, the time of the

allegations (2019 – 2021).

The historic allegations mean that there is a heightened modern slavery risk in the supply chain. The company has exhibited a willingness to exploit migrant workers in the past. Their lack of control over recruitment agencies and fees in Nepal, Bangladesh and Myanmar means that the risk of debt bondage still exists with migrant workers from these countries.

The second glove manufacturer is a prominent Australian manufacturer of disposable medical gloves and other products with operations in Malaysia. This manufacturer has had well-publicised modern slavery risks in its supply chain and took action against a Malaysian ceramic glove mould maker in 2025.

In late 2025, in response to evolving concerns around modern slavery risks in medical glove supply chains, Sydney University initiated a sector-wide review of medical gloves under the AUPN framework, requesting information from participating universities to help build a sector-wide view of glove procurement modern slavery risks and identify opportunities for collaborative action, including supplier engagement and risk reduction strategies. ACU provided details of the above identified suppliers for the project. Once the information gathering stage is complete, the project's intentions are to:

- strengthen member universities' collective due diligence,
- inform a coordinated response to modern slavery risks in the glove industry, and
- engage with suppliers as a collective.

In 2026, the AUPN will provide findings to AUPN member universities, and the group will work together on a coordinated supplier due diligence strategy.

**PROPERTY MANAGEMENT SUPPLIERS AND TIER 2 CLEANING CONTRACTOR RISK EXERCISE**

During 2025, an exercise undertaken by the specialist modern slavery compliance resource revealed that some property management suppliers leasing properties to ACU were using their own cleaning contractors to clean common areas.

ACU identified this as a modern slavery risk, as the university had no visibility of the employment conditions of these cleaners. This contrasted strongly with ACU’s own new cleaning supplier contract, which was awarded after a rigorous external due diligence process.

A desktop review of eight of ACU’s highest spend property management suppliers was conducted, and their governance structures and measures to mitigate any modern slavery risk reviewed. Four of the property management suppliers had specific measures in place to mitigate modern slavery risks. One of these suppliers was a current member of the Cleaning Accountability Framework (CAF), a certification body aiming to prevent exploitation in the cleaning sector. One supplier was a local government body responsible for annual reporting

under the requirements of the Heightened Modern Slavery Due Diligence reporting to the New South Wales Anti-Slavery Commissioner. Modern slavery statements had been submitted by three of these property management suppliers, although one of the statements was not for the previous reporting period. Four property management suppliers had no publicly available policies on human rights or mechanisms in place to mitigate modern slavery risks.

The review of these property management suppliers was undertaken to gain information on their policies, governance mechanisms and specific modern slavery risk management processes. ACU will continue to monitor any potential risk with those suppliers lacking governance mechanisms and will consider engaging with them directly in efforts to address those gaps in the next reporting period. The Properties and Facilities Directorate has committed to complete interviews, awareness and reviews of those property management vendors without published modern slavery documentation (which represent 1.5% of ACU’s leased space). The project is forecast for completion by September 2026.

| PROPERTY MANAGEMENT SUPPLIERS 2025 DUE DILIGENCE |  |   |
|--|--|---|
| SUPPLIER   | TYPE                                     | RISK MANAGEMENT AND GOVERNANCE STRUCTURES   |
| Supplier A                                       | Local government body                    | <ul style="list-style-type: none"> <li>Annual reporting under the requirements of the Heightened Modern Slavery Due Diligence reporting to the New South Wales Anti-slavery Commissioner</li> </ul>   |
| Supplier B                                       | Australian subsidiary of a multinational | <ul style="list-style-type: none"> <li>Human rights policy – modern slavery</li> <li>Modern slavery training for property management employees</li> <li>Modern slavery statements identifying sub-contracted cleaning as a priority 1 risk</li> <li>Supplier code of conduct</li> <li>Whistleblower policy – EthicsPoint</li> <li>Member of the Property Council of Australia’s Modern Slavery and Human Rights Working Group</li> <li>Recognition of the Cleaning Accountability Framework (CAF) and certified cleaning suppliers</li> </ul> |
| Supplier C                                       | Australian subsidiary of a multinational | <ul style="list-style-type: none"> <li>Modern slavery statement</li> <li>Global code of business conduct – October 2024 (respects human rights, prohibits all forms of forced or compulsory labour, and prohibits the use of child labour)</li> <li>Global vendor/supplier integrity policy (prohibits all forms of forced or compulsory labour and prohibits the use of child labour)</li> <li>Whistleblower policy – EthicsPoint</li> </ul>   |
| Supplier D                                       | Australian subsidiary of a multinational | <ul style="list-style-type: none"> <li>Anti-slavery policy</li> <li>Supplier code of conduct</li> <li>Whistleblowing policy</li> <li>Modern slavery remediation plan</li> <li>Modern slavery statement</li> </ul>   |

The following property management suppliers had no publicly available material on their governance structures or measures to mitigate modern slavery risks. A follow-up assessment will be conducted in 2026 to obtain these details from the suppliers.

| PROPERTY MANAGEMENT SUPPLIERS IN 2025 WITH NO PUBLICLY AVAILABLE POLICIES ON GOVERNANCE OR MODERN SLAVERY |  |   |                       |
|---|--|---|-----------------------|
| SUPPLIER  | TYPE                                       | RISK MANAGEMENT AND GOVERNANCE STRUCTURES                                     | ACU SPEND IN 2025     |
| Supplier E  | Australian international real estate group | No publicly available policies<br>Member of the Property Council of Australia | More than \$3 million |
| Supplier F  | Australian company                         | No publicly available policies  | More than \$500,000   |
| Supplier G  | Australian wealth management company       | No publicly available policies  | More than \$190,000   |
| Supplier H  |  | No publicly available policies  |                       |

Details of the external cleaning contractors were provided and due diligence checks conducted on these Tier 2 suppliers (engaged by the property management suppliers). ACU's Properties and Facilities team provided details of two external suppliers:

**Supplier 1** had been engaged in industrial action in 2002, but there were no indications of labour exploitation of their subcontracted workers.

**Supplier 2** had strong governance mechanisms in place to monitor worker conditions and grievances.

This exercise provides an important insight into ACU's property management suppliers' mechanisms to reduce modern slavery risk, while highlighting significant gaps revealed in those with no policies and safeguards. It also emphasises the importance of seeking visibility beyond the Tier 1 supplier base (in this case the Tier 2 cleaning contractors) to monitor whether ACU's high Tier 1 standards are being sought and delivered.



# Modern slavery action plan and road map

## ROADMAP OF AREAS REQUIRING FURTHER ACTIVITY

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 MS. 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 stakeholders, 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. Workers need to feel safe to speak candidly, privately and not feel threatened   |
|  | 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.   |  |   |

# Criterion 5: Effectiveness assessment

## Continuous improvement - ACU Sedex SAQ scoring

Collaboration is at the heart of accelerating progress. This also includes opportunities to comparatively measure social, environmental and governance (business ethics) risks and actions with peers in our network.

In its foundational stages, ACU used an internally devised ACAN framework to measure progress. This bespoke approach reflected the unique priorities, constraints and practices across Catholic organisations. In 2024, an ACAN maturity assessment measurement tool was introduced, the results of which were incorporated into that reporting period's statement. In 2025, the ACAN program adopted

a globally recognised risk measurement system through Sedex. This aligns reporting entities with a methodology that combines global data about risks in different countries and industries with site-specific information from the Sedex platform. Sedex regularly updates the methodology to ensure it is aligned with new and emerging risks. Therefore, completion of the Sedex SAQ by ACU suppliers is a substantial measure of continuous improvement year on year. Below is an explanation of how scoring is calculated using the Sedex SAQ and ACU's 2025 risk scores and management controls that will serve as our benchmark for continuous improvement.

## ACU 2025 Sedex Risk Score - Explanation and results

0 = Low risk – 10 = High risk

### ACU SEDEX COMBINED RISK SCORE: 3.4/10 (LOW RISK)

Calculated from inherent risk scores plus ACU site characteristics, adjusted for management controls and audit results. The score is broken down by pillar and highlights strengths and opportunities to focus our efforts on key areas that drive ethical and sustainable practices.

### INHERENT (COUNTRY/REGION/SECTOR) RISK SCORES

These scores predict potential risks based on a country/region and sector and can be used as a baseline to identify and prioritise areas for improvement in operations. These scores show the natural risks of doing business in a specific country or sector and do not include any details about individual sites.

#### Labour standards pillar – ACU's score: 2.9/10 (Low Risk)

Assesses location and industry factors that could increase labour risks, such as vulnerable worker populations or high rates of workplace violations.

#### Health and safety pillar – ACU's score: 2.4/10 (Low Risk)

Considers regional and industry-specific health and safety risks, including local regulations and industry accident rates.

#### Business ethics pillar – ACU's score: 1.8/10 (Low Risk)

Assesses industry and location risks related to unethical practices, such as high corruption levels or weak regulatory oversight.

#### Environment pillar – ACU's score: 3.6/10 (Low Risk)

Examines the environmental impact of the site's industry and location, such as pollution levels or resource use that may create regulatory or compliance risks.

### ACU SEDEX SITE CHARACTERISTICS RISK SCORES

Highlight potential risks based on ACU's SAQ responses in the labour standards and health and safety pillars. These scores can be used to assess and support the implementation of policies and processes that mitigate workplace

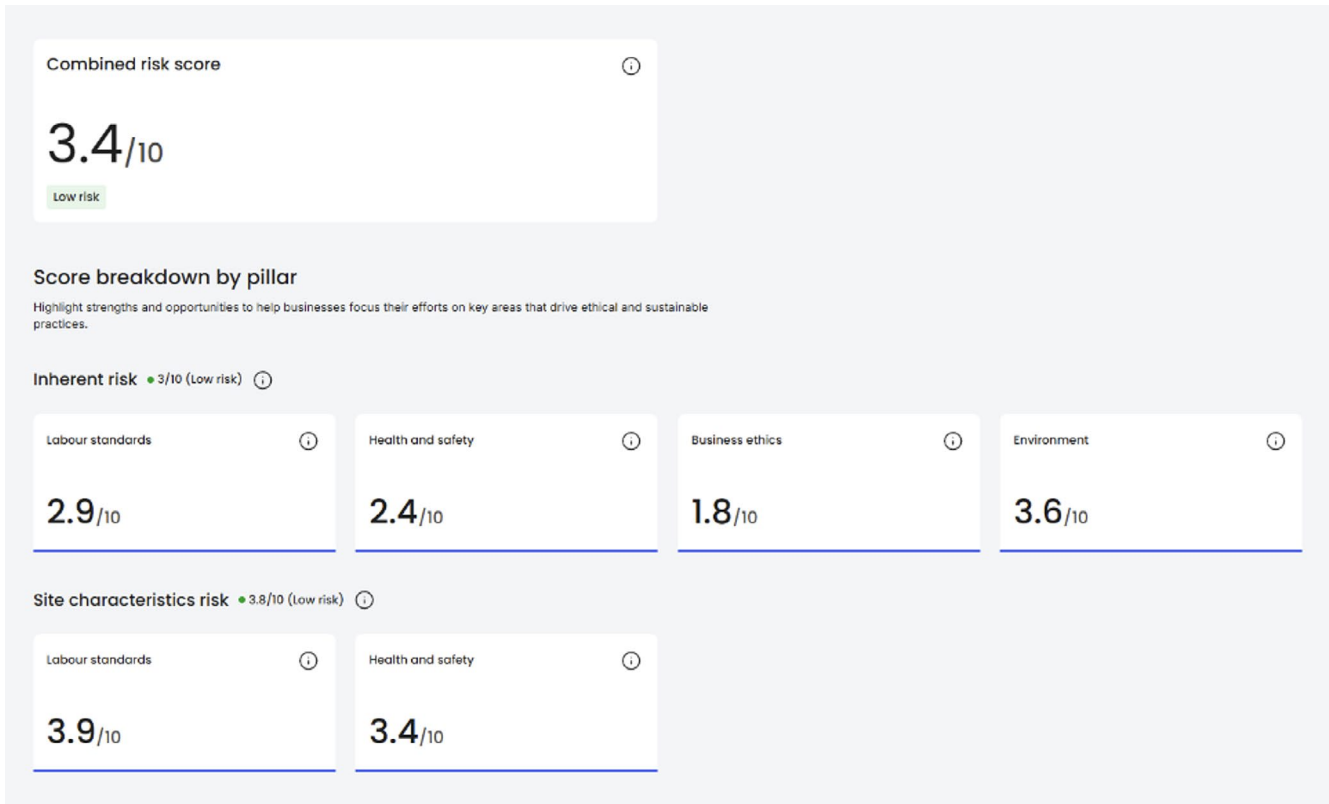
risks within ACU's supply chain. The Environment site characteristics consider the type of work, business and location (eg proximity to sensitive areas). For the Core pillars below, risks are assessed based on the nature of the work, such as exposure to heavy machinery or hazardous materials.

#### Labour standards pillar – ACU's score: 3.9/10 (Low Risk)

Reflects labour-related risks like employment practices, workers' rights and wages based on SAQ responses. High-risk activities in this area can raise the score.

#### Health and safety pillar – ACU's score: 3.4/10 (Low Risk)

Based on SAQ responses to questions about site-specific health and safety factors, such as equipment usage, handling of chemicals or accident risks.



## ACU 2025 Sedex Management Controls Scores - Explanation and results

0 = Low score – 5 = High score

### ACU SEDEX COMBINED MANAGEMENT CONTROLS SCORE: 3.8/5 (GOOD)

These scores measure how well policies or processes are in place to reduce the risks from the site characteristics. They are based on answers to ACU's Sedex SAQ. Poor scores of 0 – 0.9 indicate that there are few or no controls in place. Advanced scores of 4 – 5 indicate there are exemplary controls which exceed compliance and drive innovation. Key pillars are described below, with the diagram showing the range of pillars taken into consideration.

### Labour standards pillar – ACU's score: 3.7/5 (Good)

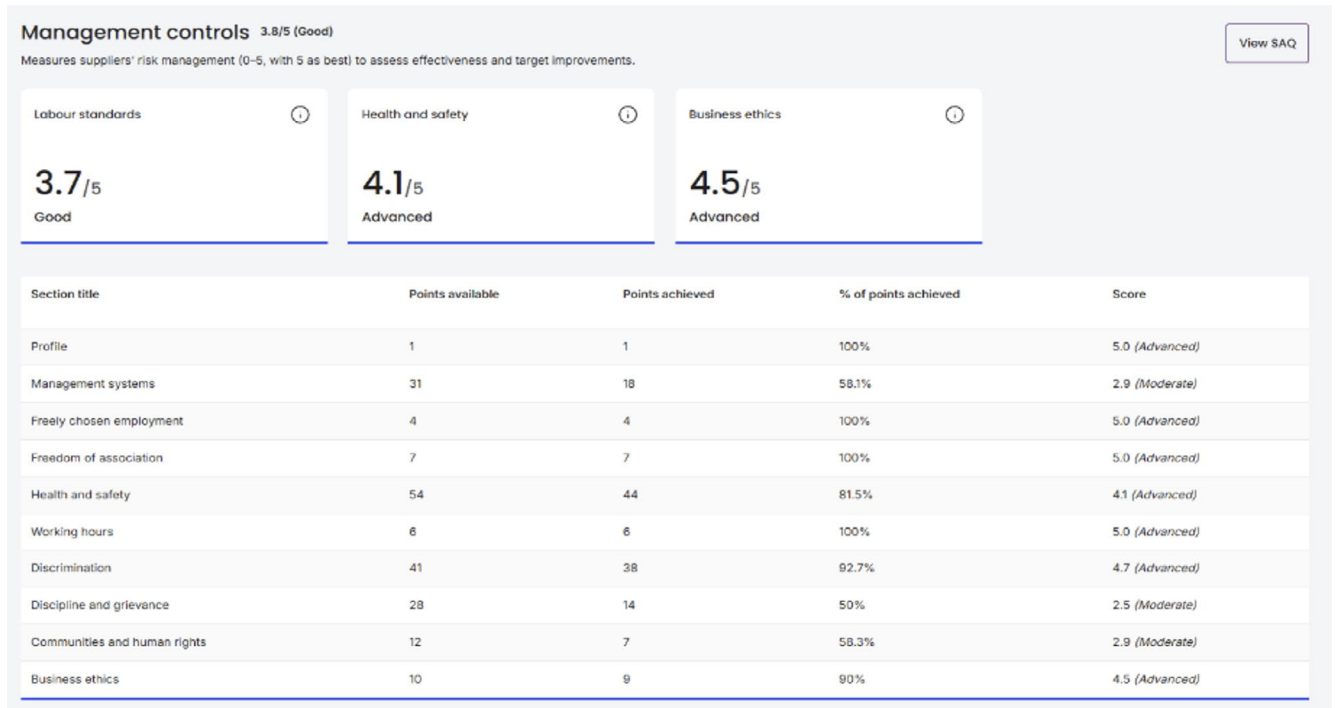
Evaluates policies and processes to ensure fair labour standards and worker protections are effectively managed.

### Health and safety pillar – ACU's score: 4.1/5 (Advanced)

Reviews the adequacy of safety protocols, emergency preparedness and training efforts to manage health and safety risks on site.

### Business ethics pillar – ACU's score: 4.5/5 (Advanced)

Evaluates controls against unethical practices such as anti-bribery policies, compliance with legal standards and transparent operations.



## 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

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

# ACAN-generated ACU baseline data table

The ACAN-generated ACU baseline data table provides a comparative measure of supplier engagement and program activities to measure progress and inform future action planning. The 2025 result, as compared with 2024, is as follows:

| ACTIVITY   | 2024  | 2025   |
|--|-------|--|
| <b>INTERNAL / STAFF</b>  |       |  |
| Hours spent on modern slavery activities   | 720   | 1,310 (increased hours due to work of specialist MS supplier compliance resource)  |
| Number of staff completed at least one module of modern slavery e-learning   | 468 c | 812c   |
| E-learning modules completed in total = Module 1, Module 2 and Module 3 (an advanced role-specific module newly introduced in 2025).   | 897 c | 1,621c   |
| <b>EXTERNAL/SUPPLIER ENGAGEMENT</b>  |       |  |
| Number of ACAN Supplier Surveys completed  | 276c  | 492c   |
| Number of suppliers invited to join Sedex  | 85c   | 136c (includes a number of targeted joint ACU/ACAN and ACU-direct invitations to highest risk and highest spend suppliers) |
| Number of suppliers that Joined Sedex  | 37c   | 89c (refer ACAN Supplier Engagement Diagram for 2025 spend only figure = 75)   |
| Number of ACU suppliers with Sedex SAQ completed   | 8c    | 51c  |
| Total number of non-conformances and non-compliances (NCs) remediated by ACU suppliers as identified during SMETA social compliance audits. Increased NC numbers are a direct result of increased site level due diligence activities. NCs identified can be across a broad range of areas, as per the SMETA standard. | 0     | 32   |
| <b>DOMUS 8.7 EXTERNAL REFERRALS</b>  |       |  |
| Contacts made via worker voice/grievance mechanism – FairCall external whistleblowing service.   | 24    | 0  |
| Numbers shown are as instances recorded prior to any investigation or explanatory information being sought.  |       |  |
| Referrals for advice and assistance  | 0     | 0  |
| Individuals identified or referred for modern slavery assessment   | 0     | 0  |
| Individuals with modern slavery cases remediated   | 0     | 0  |

Note: c = cumulative total

# 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 sponsors SCBN's Anti-Slavery Commissioner event, 'Putting Modern Slavery out of Business'

In November 2025, ACU sponsored the Sydney Catholic Business Network (SCBN) lunch and panel discussion, at which the Australian Anti-Slavery Commissioner Chris Evans spoke of his plan to strengthen the national response to modern slavery, and commended the Catholic sector's actions and leadership in relation to modern slavery.

"Through the Australian Catholic Anti-Slavery Network and Domus 8.7, the Catholic sector has become a national leader in implementing the Modern Slavery Act," said Mr Evans. "Together, through these initiatives, you are translating legal obligations into meaningful action, protecting workers and building the capacity of teams and suppliers across Australia."

The Commissioner also spoke of: "the privilege to be with so many leaders across Catholic health, education, social services, finance and community sectors – those who carry forward a long tradition of service, grounded in human dignity and the common good."

ACAN Lived Experience consultant Moe Turaga shared his lived experience of modern slavery and advocacy for improved responses.

ACAN/Domus 8.7 Program Manager, Jenny Stanger, provided an overview of both organisations, the Catholic response to modern slavery and the Modern Slavery Act 2018.

The event attracted 280 attendees, with a number of ACU senior executive in attendance.



Image Credit: Giovanni Portelli



**Australian Catholic  
University (ACU)**  
**Modern Slavery  
Statement 2025**

