



Modern Slavery Statement

June 2026



From our Vice-Chancellor



Freedom from slavery is a fundamental human right. At Swinburne University of Technology, we condemn all forms of modern slavery and forced labour, and we recognise the important role universities play in contributing to the global effort to prevent and address modern slavery.

Swinburne is driven by a vision of people and technology working together to build a better world. Achieving this requires strong governance, ethical leadership and a long term commitment to responsible practice. As part of this commitment, we take deliberate and ongoing action to identify, assess and address the risk of modern slavery within our operations, supply chains and partnerships. We know that this work is integral to how we create value and uphold trust with our communities.

Throughout the reporting period, Swinburne continued to strengthen its approach to modern slavery risk management, embedding consideration of human rights risks into procurement, operational decision making and oversight processes. We remain committed to continuous improvement and to working collaboratively with suppliers, partners and sector peers to lift standards and share responsibility for addressing modern slavery risks.

Collaboration remains central to our approach. Swinburne continued its active participation in the Australian Universities Procurement Network's Anti Slavery Program, supporting a coordinated, sector wide response that reflects shared accountability and collective impact.

We also recognise the importance of responsible procurement and ethical labour practices, particularly in higher risk goods and services areas. By supporting initiatives that promote transparency, accountability and improved working conditions, and by applying lessons learned to our own practices, we continue to strengthen our governance and risk management capability.

As an educational institution, Swinburne acknowledges its responsibility to build capability and awareness across our community. We continue to support staff and students to understand modern slavery risks and the role individuals can play in identifying concerns and contributing to ethical and responsible practices.

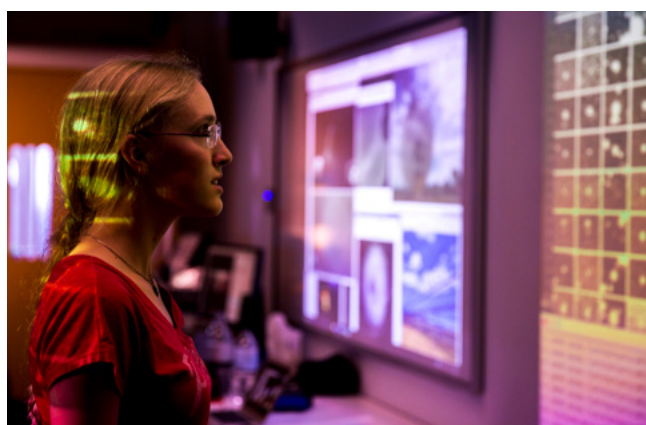
We further recognise the opportunity to influence positive change through our financial investments. Consideration of human rights risks, including modern slavery, alongside environmental sustainability and long term resilience, remains an important element of Swinburne's approach.

At Swinburne, we are committed to fostering an inclusive and respectful culture and to delivering positive social outcomes across the breadth of our organisation. Addressing modern slavery is an ongoing responsibility, and we remain focused on strengthening our systems, practices and accountability – to being better every day.

With pride, I present this Modern Slavery Statement and reaffirm Swinburne's commitment to doing our part to address this significant global issue.

Professor Pascale Quester AO
Vice-Chancellor and President

About Swinburne University of Technology



Swinburne University of Technology is a multisector university, shaped by technology, innovation and strong engagement with industry and community.

We provide vocational education and higher education, as well as short courses and research and innovation capabilities, and are recognised for our applied, industry connected approach to learning, research and partnership.

Swinburne's vision is to bring people and technology together to build a better world. Guided by our Ad Astra_2030 strategy, the university is focused on creating long term value for society by building capability, fostering innovation and ensuring our activities are underpinned by responsible governance and ethical practice.

Ad Astra_2030 articulates a set of priorities, including our four quantum leaps - ambitious objectives that focus the university on delivering meaningful impact for learners, partners and communities. These quantum leaps reflect Swinburne's commitment to tailored and innovative pathways for all, leading and leveraging technology for purpose, co-creating industries of the future, and seeing the world as our campus. Swinburne has an international reputation for high quality research that connects science and technology with industry, government and the community. This is reflected in global rankings that place Swinburne among the top 300 universities worldwide and among the leading young universities internationally.

Our researchers work collaboratively with industry, communities and government to co create solutions to complex global challenges. In line with Ad Astra_2030, Swinburne continues to invest in areas of established and emerging strength, including space and aerospace technology; sustainability and innovative planet solutions; medical technology and health innovation; digital capability; manufacturing futures; and social and community innovation.

Swinburne offers programs across a broad range of disciplines, including arts and humanities, business, design, education, engineering, health, information technology, law, media and communications, science, and vocational education. Our strong industry connections help ensure learning remains relevant and responsive, with students supported through practical, work integrated experiences that build job ready skills.

Swinburne operates campuses in Melbourne at Hawthorn, Croydon and Wantirna, and has an international presence through its Sarawak campus in Malaysia and locations in Sri Lanka, Vietnam, China, Hong Kong SAR and Qatar. Swinburne is also a leader in online education through Swinburne Online.

The university holds an investment portfolio managed by a third party specialist investment adviser under the oversight of Council and relevant sub committees, and in accordance with Swinburne's Responsible Investment Charter.



Reporting entity

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

Controlled Entities as at 31 December 2025

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

Consolidated revenue for Swinburne and its controlled entities for the period 1 January 2025 to 31 December 2025 is \$943 million.

Our commitment to sustainability and reconciliation

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

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

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

Swinburne was the first Australian university to achieve 'Elevate' status for our second Reconciliation Action Plan (RAP), the highest level of endorsement by Reconciliation Australia. Our third Reconciliation Action Plan 2020–2023 was also endorsed as an Elevate RAP, signifying Swinburne's strong commitment to reconciliation. Swinburne has now decided to pursue an alternative, overarching agreement with the Wurundjeri Nation.

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

In 2025 Swinburne became a Climate Active – Carbon Neutral Certified Organisation. This milestone achievement delivered on the commitment made in December 2019, when Swinburne became the first university in Victoria to sign the Global Climate Emergency Letter in recognition of the need for a drastic societal shift to combat the growing threat of climate change. Swinburne's Carbon Neutral – Public Disclosure Statement includes a strategic set of actions to reduce emissions by 1-3% per year from building projects and services, asset and facility management, information technology, and corporate operations. A program of LED lighting upgrades and optimisation of heating, ventilation and air-conditioning services is being implemented to reduce operational carbon emissions. Large Generation Certificates (renewable electricity) are purchased for 100% of Swinburne's electricity and carbon offsets are purchased for all scope 1 and 3 emissions, enabling Swinburne to be carbon neutral.

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

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

Our risk and governance frameworks

Under the *Swinburne University of Technology Act 2010*, Council maintains responsibility and oversight of the university's Risk Management Policy (as part of the People, Culture and Integrity Policy) and Framework through its Audit and Risk Committee.

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

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

The Executive Group, senior management and risk partners across the University are responsible for driving a positive risk culture through initiatives and processes. The University's

Strategic Risks are reviewed every year to ensure they appropriately reflect the current landscape and the risks and challenges impacting the execution of the University's strategy. Management must provide mitigating strategies against the identified risks with regular reporting to the Audit and Risk Committee.

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

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

Our supply chain

Swinburne procures goods and services across a diverse supplier base to support campus operations, teaching and research, and the broader administration of the University.

This includes services such as cleaning, security and maintenance, as well as IT systems, library resources, laboratory supplies, advertising, recruitment and office consumables. In 2025, the university engaged 11,970 suppliers (of which 3,233 were transacted via our enterprise finance platform) to supply 97,901 transactions of goods or services (of which 54,502 of these transactions were purchased via corporate card). **Table 1** highlights the proportion of spend across the different categories of spend by the university.

In 2025, 88% of Swinburne's supply chain spend was with Australian-based suppliers, including a considerable proportion located in the local areas surrounding the university's Melbourne campuses. Internationally, Swinburne has supply arrangements with businesses located across Europe, North America, and Asia-Pacific. **Table 2** outlines the location of the university's most common suppliers outside Australia.

Swinburne typically establishes long term relationships with high value and strategic suppliers. Where appropriate, these relationships may extend to collaboration on strategically aligned outcomes, including research and education. Suppliers providing lower value or lower risk goods and services are generally engaged through ongoing or ad hoc transactional arrangements.

Table 1: Proportion of total spend by spend categories

Spend area	Spend (excluding GST) (AUD)	Proportion of total spend (%)
IT Services, Software and Hardware	\$53,429,877.08	22%
Contracted Services and Teaching expenses	\$45,466,142.37	19%
Facilities Maintenance and Infrastructure	\$38,628,624.54	16%
Staff, Student and Library Services	\$39,152,984.70	16%
Marketing & Events	\$17,118,367.44	7%
Corporate Services	\$12,712,298.90	5%
Travel & Fleet	\$12,205,628.05	5%
Energy & Utilities	\$7,319,727.44	3%
Telecommunications	\$4,002,733.94	2%
Other	\$12,366,840.54	5%

Table 2: Most common locations of international suppliers

Supplier country/region	Number of suppliers	Predominant spend areas
United States of America	142	Library materials, IT software, laboratory supplies, research and other expenses
United Kingdom	100	IT software licences & subscriptions, library materials, IT professional services, subscriptions and memberships, research and teaching equipment & services
Malaysia	56	Labour & Professional Services, Student recruitment (international), lecturer and teaching expenses, real estate
China	56	IT Communications & Technology, Student recruitment (international), research equipment parts and servicing, lecturer and teaching expenses
India	51	IT Software, Student recruitment (international), professional services, research and teaching equipment & services, travel expenses
Canada	35	Lecturer and teaching expenses, Logistics, events, IT software, research equipment
Vietnam	25	Student recruitment (international), travel expenses
Germany	24	Library materials, research equipment, research expenses, Student recruitment (international), IT software
Singapore	23	IT Software, Student recruitment (international), advertising and media, research expenses
New Zealand	21	IT Software, Research expenses, lecturer and teaching expenses, Training & Development
Indonesia	20	Student recruitment (international)
Hong Kong SAR	20	Student recruitment (international), events, research equipment parts and servicing, logistics

Understanding our modern slavery risks

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

We adopt the definition of modern slavery set out in the Australian Modern Slavery Act, which includes serious forms of exploitation such as trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting practices, and the worst forms of child labour.

We support the UN Guiding Principles on Business and Human Rights as the global standard for addressing business related human rights impacts. In line with these principles, Swinburne acknowledges its responsibility to respect human rights and to take reasonable steps to prevent, mitigate and, where appropriate, address modern slavery risks across our operations, supply chains and investments.

Operational risks

Swinburne's total student headcount in 2025 was 43,906 across higher education and 25,303 across vocational education. At the end of 2025, Swinburne had more than 2,800 employees (2,505 full-time equivalent), comprising full-time, part-time and fixed term and casual staff.

Most Swinburne employees have their terms and conditions of employment defined in one of the university's enterprise agreements. Staff are represented in the enterprise

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

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

We have policies and procedures in place to ensure a safe, equitable and supportive working environment for our staff and students. Swinburne's People, Culture and Integrity Policy sets out Swinburne's commitment to building a positive culture, promoting integrity, and supporting university members, community and industry partners. Ethical conduct is expected, encouraged, and supported with no tolerance for

corrupt conduct, fraudulent activities, and maladministration. The policy requires that responsible persons must be free from a conflict of interest, bias and inappropriate influence when making decisions and dealing with other persons or organisations on behalf of the university. These policies are supported by the Complaints, Reviews, Appeals and Misconduct Framework for students and staff.

The University has also aligned its policies, procedures and reporting mechanisms with recent reforms relating to gender based violence, including sexual harassment and sexual misconduct, to ensure appropriate prevention, response and support arrangements are in place. Ethical conduct is expected, encouraged and supported, with no tolerance for corrupt conduct, fraud, maladministration, discrimination, harassment or violence.

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

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

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

Swinburne takes reports of illegal or improper activity seriously and is committed to conducting its activities with integrity. Swinburne uses an independent disclosure service (called Stopline) for employees and third parties to report suspected or actual illegal or improper activity. Concerns can also be raised directly with the University's Disclosure Officer (currently the General Counsel) and disclosers may disclose anonymously if they wish. Information outlining how to access this service and the process for managing claims is found within Swinburne's Improper Conduct and Whistleblowing Guidelines.

Swinburne researchers are committed to the highest ethical, professional, and scholarly standards. Our research adheres to the Australian Code for the Responsible Conduct of Research. We are committed to ensuring that all research is conducted responsibly with honesty, integrity and respect for human research participants, animals, and the environment. Research may be undertaken in partnership with a variety of Australian and international external parties that may include start-ups, small to medium enterprises, not-for-profit enterprises, multinationals, and government bodies. Due diligence is carried out on potential research partners to assess ethical and sustainable business practices that align with Swinburne's own integrity standards. Foreign interference legislative requirements are adhered to, supported by assessment and reporting processes.

Employee concerns in relation to any of the above operational risks can also be registered with People & Culture via SwinHelp or SwinRisk, two newly introduced software platforms that assist and support the University and its employees.

Students

Swinburne recognises that students may face potential modern slavery risks through employment, placements, internships, other Work Integrated Learning (WIL) activities and volunteering, within Australia and overseas. While the overall risk is assessed as low, student employment and non employment based learning arrangements are identified as higher risk areas, with international students potentially more vulnerable due to reduced familiarity with workplace rights and support pathways. These risks are mitigated through embedded controls within Swinburne's WIL and student experience frameworks, including partner due diligence, formal agreements defining welfare responsibilities, student preparation and education on work rights, ongoing monitoring of placements, and clear escalation and support mechanisms where concerns arise.

Investment portfolio risk

Through its investments in public and private companies, Swinburne can influence environmental and social outcomes. We seek to use this influence to support positive change, guided by our Responsible Investment Charter, which focuses on climate change, human rights and modern slavery, and sustainable development.

Swinburne requires its investment manager (currently Mercer) to conduct an annual review of portfolio performance against the Responsible Investment Charter and recognised best practices. The 2025 review confirmed that the portfolio continues to comply with all Charter commitments and performs strongly across key ESG measures. Swinburne was rated A+ in Mercer's Responsible Investment Evaluation, an improvement on the 2024 result, and ranked well within the upper quartile of its global peer group, which includes the university and education sector.

The review also confirmed that the portfolio has no exposure to companies associated with high severity modern slavery incidents, aligned with UN Global Compact principles on forced and child labour. Mercer reports at least annually to Swinburne's Audit and Risk Committee and Council on assessments undertaken to confirm this position.

Supply chain risks

Every year an analysis is conducted periodically on Swinburne's procurement spend to assess the risks of modern slavery across our supply chain. The risk assessment for 2025 spend is based on outputs from the Arc Blue (part of Bain & Company) modern slavery tool that determines risk from different sources (e.g. Global Slavery Index, RESPECT Responsible and Ethical Private Sector Coalition Against Trafficking, NSW Anti-Slavery Commissioner Guidance on Reasonable Steps etc.) and applies at a country, spend category (i.e. broadly aligned to industries), and supplier level.

Insights from the tool highlight that in 2025 Swinburne procured from 79 spend categories (1,245 suppliers) that are determined to be of an inherent high risk of modern slavery influenced by factors such as complex global goods supply chains and low skill labour workforces (see **Graph 1**). The level of risk assigned to the category presents a view on the level of risk for that industry's supply chain, rather than the risk of the direct supplier alone.

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

Swinburne procures a limited proportion of goods and services directly from overseas suppliers, representing 23.58 per cent of the University's total supplier base. Of these, 120 suppliers

located across parts of Asia, South America and Africa regions are assessed as presenting a higher inherent risk of modern slavery, reflecting the elevated prevalence of modern slavery and human trafficking in parts of those regions. These suppliers represent 3.72% per cent of Swinburne's total supplier base, as outlined in **Graph 2** and **Table 4**.

Consistent with Swinburne's focus on local procurement, expenditure with suppliers based in higher risk locations outside Australia is limited and is primarily associated with student (international) recruitment services and specific educational support services.

Graph 1: Spend category inherent risk level

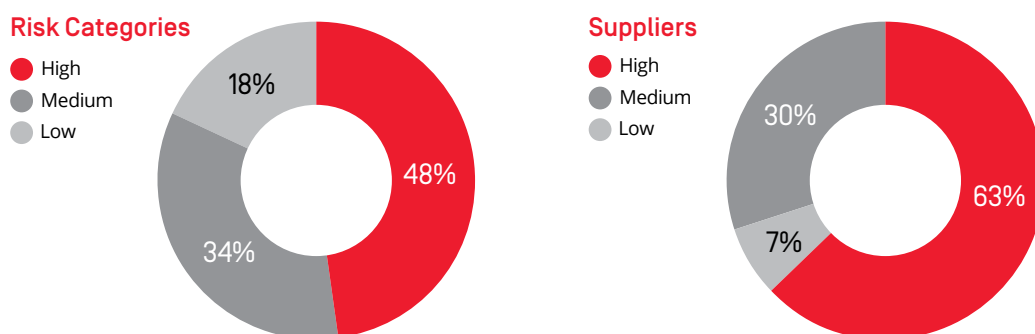


Table 3: Inherent high-risk spend areas

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

Table 4: Suppliers from inherent high-risk countries

High-risk country	Number of suppliers	% of total suppliers	Amount
India	51	1.58%	\$371,841.76
Sri Lanka	9	0.28%	\$59,235.79
Pakistan	7	0.22%	\$7,995.00
Bangladesh	7	0.22%	\$7,145.00
Cambodia	4	0.12%	\$12,152.28
South Africa	3	0.09%	\$3,588.68
Saudi Arabia	3	0.09%	\$13,060.00
Philippines	2	0.06%	\$58.23
Lao PDR	2	0.06%	\$2,330.53
Colombia	2	0.06%	\$1,325.00
Uganda	1	0.03%	\$325.00
Timor-Leste	1	0.03%	\$23,695.78
Total	92	3%	\$502,753.05

By combining inherent risk assessments across spend category and supplier country, Swinburne's modern slavery risk assessment tool identified 18 suppliers (1 per cent of total suppliers) as presenting a very high risk of modern slavery, and a further 1,107 suppliers (32 per cent) as presenting a high risk (see **Graph 4**).

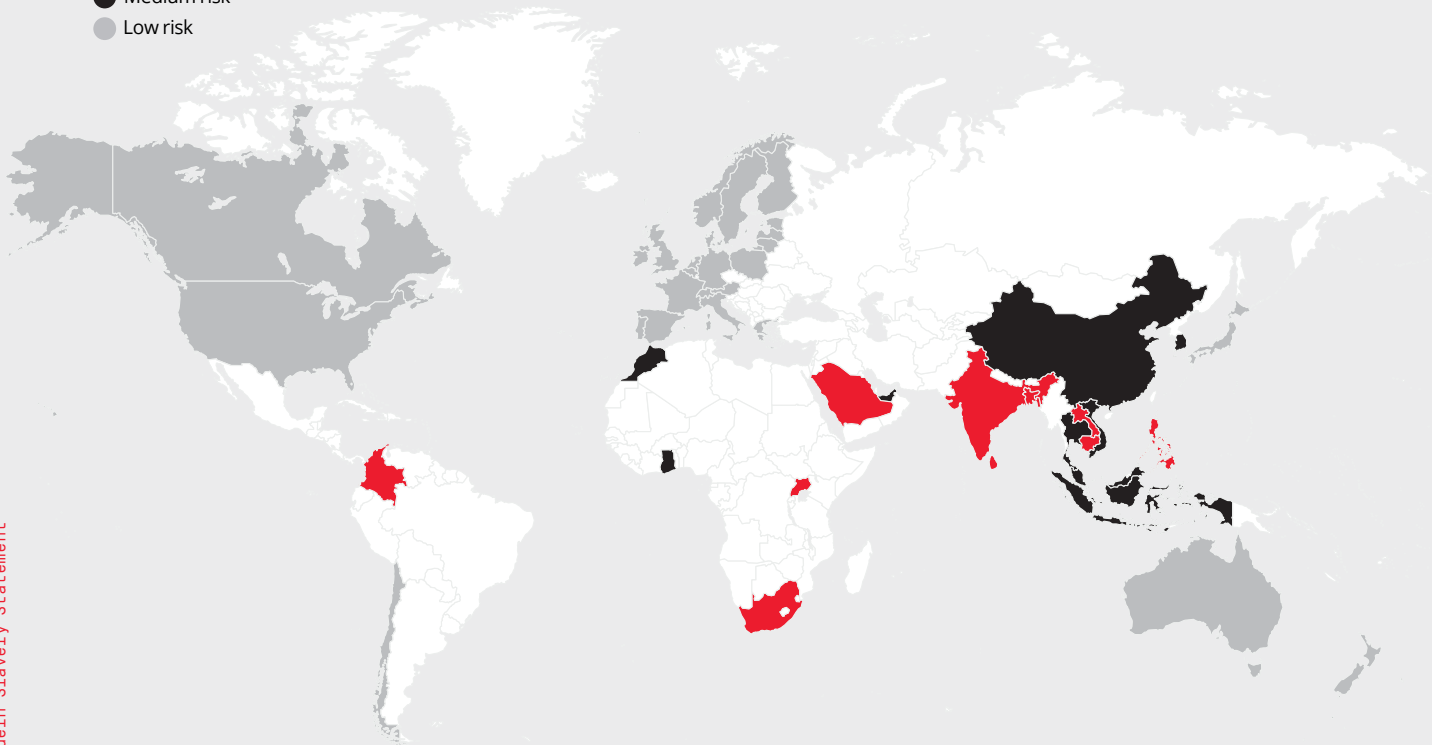
Spend categories and supplier countries identified as higher risk are subject to more detailed assessment through Swinburne's strategic procurement tenders and targeted category reviews. These assessments recognise that modern slavery risks may arise

deeper within complex global supply chains, beyond Swinburne's direct contractual suppliers. Strategic procurement activities undertaken across the University in 2025 considered and addressed inherent modern slavery risks relevant to the specific category and/or country.

While Swinburne continues to assess and address modern slavery risks across its operations, investments and research activities, the supply chain remained the primary focus during the reporting period, reflecting the higher likelihood of Swinburne's activities being linked to modern slavery in this area.

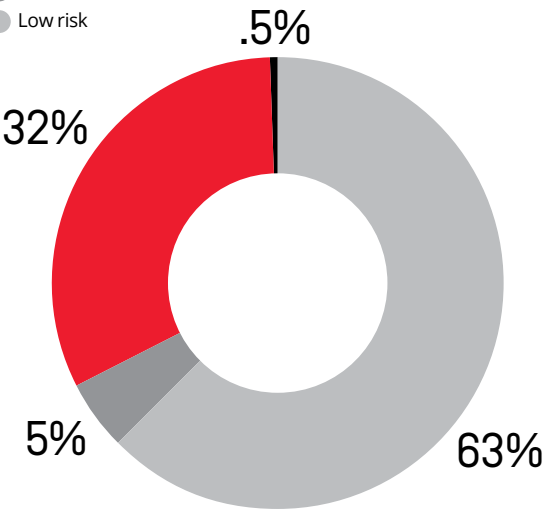
Graph 2: Geographical spread of suppliers and inherent risk levels

- Very high / high risk
- Medium risk
- Low risk



Graph 4: Overall supplier risk level

- Very high risk
- High risk
- Medium risk
- Low risk



Our actions to assess and address risks of modern slavery

Collaboration as a university sector

Swinburne recognises its responsibility to take reasonable steps to prevent, mitigate and, where appropriate, address modern slavery risks across its operations. We also work collaboratively with our direct and indirect suppliers to address modern slavery risks within our supply chains. Swinburne continues to contribute to sector wide responses, including participation in the Australian Universities Procurement Network (AUPN) Anti Slavery Program.

Raising awareness and understanding of modern slavery

As an educational institution, Swinburne recognises the importance of building awareness and capability among staff and students in relation to modern slavery as a critical human rights issue.

During 2025, Swinburne continued to deliver modern slavery awareness sessions to senior stakeholders, staff and students through procurement briefings and new starter induction programs. These sessions focus on the nature and prevalence of modern slavery, Swinburne's approach to risk management, and the role individuals play in identifying and escalating potential risks.

All members of the Procurement team continued to complete targeted modern slavery training during 2025, strengthening capability to identify, assess and respond to risks across Swinburne's supply chain. Representatives from Procurement, Legal, Risk and Governance, Research and other operational teams remain engaged to support a coordinated, whole of University approach.

Procurement policy and framework

Swinburne's procurement framework is designed to support sustainability and improved social outcomes, including the prevention of modern slavery. The University adopts a holistic approach to value for money, balancing environmental and social considerations alongside quality, timeliness and cost.

Swinburne avoids unrealistic delivery timeframes and does not pursue lowest cost outcomes where this may increase the risk of labour exploitation or other adverse impacts. The procurement framework comprises policies, procedures, guidance materials, templates and tools that seek to deliver both commercial and social value across procurement activities.

Throughout 2025, Swinburne continued to embed the framework through University wide communications, presentations and training. Due diligence measures are incorporated into procurement processes to assess modern slavery risks associated with new engagements and the existing supplier base. Procurement activities assessed as presenting a higher modern slavery risk are escalated to the Procurement team, with project planning, evaluation and decision making

stages incorporating specific consideration of modern slavery risks. Where relevant, a modern slavery risk questionnaire is included in tender processes.

Contract terms

Swinburne's standard contract templates include clauses addressing modern slavery risks. These clauses require suppliers to investigate modern slavery risks within their operations and supply chains, take appropriate due diligence and remediation actions, and maintain relevant systems and controls.

Suppliers are also required to apply equivalent obligations to their own suppliers, supporting Swinburne's objective of promoting positive impacts beyond its direct contractual relationships. These clauses are applied to all new contracts and to existing supplier contracts as they are renewed.

Supplier due diligence

To mitigate modern slavery risks within key goods and services contracts, Swinburne undertakes a range of due diligence activities, including:

- issuing targeted questionnaires to selected suppliers to assess risks and actions taken;
- requiring suppliers to demonstrate relevant policies, processes and systems during tender evaluations;
- undertaking periodic assessments of wages paid at market rates, including review of employee payslips where appropriate; and
- incorporating contractual obligations specific to reducing labour exploitation and modern slavery.

During 2025, Swinburne continued to utilise the ArcBlue supply chain transparency and modern slavery risk tool (part of Bain & Company), in collaboration with the university sector. This tool supports improved supply chain visibility, structured due diligence and the monitoring of effectiveness indicators. Due diligence undertaken during tender processes continued to highlight varying levels of supplier maturity, with further information often required to better understand and manage risks.

To supplement this approach, Swinburne continued to monitor relevant media alerts relating to suppliers, countries and industries associated with higher modern slavery risks. In 2025, deeper modern slavery reviews were undertaken across selected high risk categories to further strengthen understanding and controls.

Swinburne continued to participate in and benefit from the Australian Universities Procurement Network (AUPN) Anti Slavery Program during 2025, with a focus on embedding and consolidating initiatives established in prior years. The program delivered several key initiatives in 2025.

Academic Advisory Board

The AUPN Academic Advisory Board, established in 2020 and refreshed in 2022, continued to support the sector during 2025. The Board comprises ten academics from seven universities with expertise in modern slavery and related human rights issues.

The Board provides insight and specialist guidance to support universities in understanding modern slavery risks and appropriate responses across different operational contexts. Key insights and recommendations continued to be shared across the sector through AUPN communications and guidance materials.

Risk assessment tool and supplier engagement

Swinburne continued to utilise ArcBlue's (part of Bain & Company) modern slavery risk assessment tool during 2025, alongside most Australian universities. The tool draws on multiple external data sources, including the Global Slavery Index and guidance from relevant anti slavery bodies, to assess inherent modern slavery risk across supplier countries, spend categories and individual suppliers.

The aggregated data within the tool reflects the scale and complexity of combined university supply chains and supports sector wide visibility of shared suppliers. During 2025, Swinburne continued to use the tool to inform procurement due diligence, supplier engagement and prioritisation of higher risk categories.

Templates and guidance

Throughout 2025, Swinburne continued to leverage templates and guidance materials developed through the AUPN Anti Slavery Program. These resources include supplier risk questionnaires, contract clauses, supplier code of conduct guidance, and materials addressing grievance mechanisms, remediation and modern slavery reporting.

The guidance supports a consistent and practical approach across the sector and extends beyond procurement processes to address broader considerations relating to grievance mechanisms and remediation within a university context.

Capability uplift and engagement

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

The monthly University Anti-Slavery Forum continued to build momentum during 2025, showcasing a suite of external speakers, survivor advocates, and procurement professionals to discuss topics such as ethical apparel procurement and risk identification tools, sharing insights and learnings on important topics related to modern slavery. Procurement and other university staff attended each of the 9 sessions throughout the year, representing 41 Australian and New Zealand universities. Speakers included representatives from Etiko, Fair Supply, Electronics Watch and Survivor Connections. Meetings also discussed progress on key initiatives, updates on action addressing key risks, and invited suggestions for collaboration. Minutes and key resources were disseminated across teams and made available through the AUPN portal.

The program engaged externally during 2025 to gather insights from other sectors and collaboration programs as well as raise awareness of the AUPN program. Groups engaged include Migrant Justice Institute, Anti-Slavery Australia, and ACRATH (Australian Catholic Religious Against the Trafficking of Humans).

Further information on the AUPN Anti-Slavery Program:

www.hes.edu.au/university-anti-slavery-program



Measuring our effectiveness

As a public university, Swinburne recognises its ability to contribute to sector wide efforts to address modern slavery.

The University also acknowledges that its approach will continue to evolve and that monitoring effectiveness is critical to maintaining focus on areas of highest risk and impact.

During 2025, Swinburne continued to measure the effectiveness of its approach to modern slavery through established governance, risk, and procurement processes, with a focus on consolidation and continuous improvement rather than the introduction of new measures.

Effectiveness is assessed through:

- ongoing review and refinement of Swinburne’s modern slavery risk assessment framework and associated processes, to ensure current and appropriate consideration of human rights risks across operations and supply chains;
- periodic reassessment of the modern slavery risk profile of Swinburne’s existing supplier base, including review of supplier responses to due diligence activities and actions taken to address identified risks; and
- monitoring progress against Swinburne’s modern slavery related key performance indicators, including indicators relating to supplier risk assessments, due diligence activities and capability building initiatives.

Key Performance Indicators	2025 Outcomes
Swinburne staff and students made aware of the modern slavery issue through communications and training	Swinburne staff (key purchasers/procurers) completed training on Swinburne’s procurement framework which includes modern slavery information and guidance
Swinburne supplier engagement reviews (for example, tenders) that have incorporated an assessment of modern slavery risks in the supplier’s operations and supply chain	At least 40 strategic procurement tenders across equipment and service engagements have included a review of supplier modern slavery policies, prevention actions, and labour law compliance. This includes tenders for Safety & Risk, Electricity, Building refurbishments, Asset maintenance, Management services, Recruitment Panel, etc.
Swinburne supplier contracts that include modern slavery clauses	At least 50 new services agreements/ agreement variations including modern slavery clauses were agreed and executed
High-risk suppliers engaged in response to risk alerts or undertaking proactive reviews.	Five deep modern slavery assessments were undertaken across services and merchandise categories, including executing detailed engagements with suppliers
Year-on-year reduction in the proportion of suppliers indicated as being of a higher risk of modern slavery	The University continues to make progress in reducing the level of very high and high risk of modern slavery.



Priorities for the future

Swinburne recognises that addressing modern slavery requires continuous learning and ongoing improvement.

In 2026, Swinburne's priorities focus on consolidating existing practices, strengthening capability and continuing to embed modern slavery considerations into core procurement and governance processes.

Key priorities include:

- continuing to build capability across Procurement, Sustainability and relevant operational teams to identify modern slavery risks and assess supplier maturity within strategic procurement activities, alongside broader ESG considerations;

- embedding the use of analytics and insights generated through the ArcBlue modern slavery tool within procurement processes, including informing tender evaluations and deeper assessments of higher risk spend categories;
- progressively engaging suppliers to participate in modern slavery due diligence activities, including completion of modern slavery questionnaires in selected higher risk categories;
- continuing collaboration with the university sector through the AUPN Modern Slavery Program to address shared risks, emerging issues and good practice; and
- maintaining awareness raising and capability building activities across the University through targeted communications, briefings and training.

These priorities reflect a focus on embedding and refining existing controls, rather than introducing new frameworks or tools.



Consultation with our controlled entities

The actions undertaken by Swinburne to assess and address modern slavery risks apply across all controlled entities.

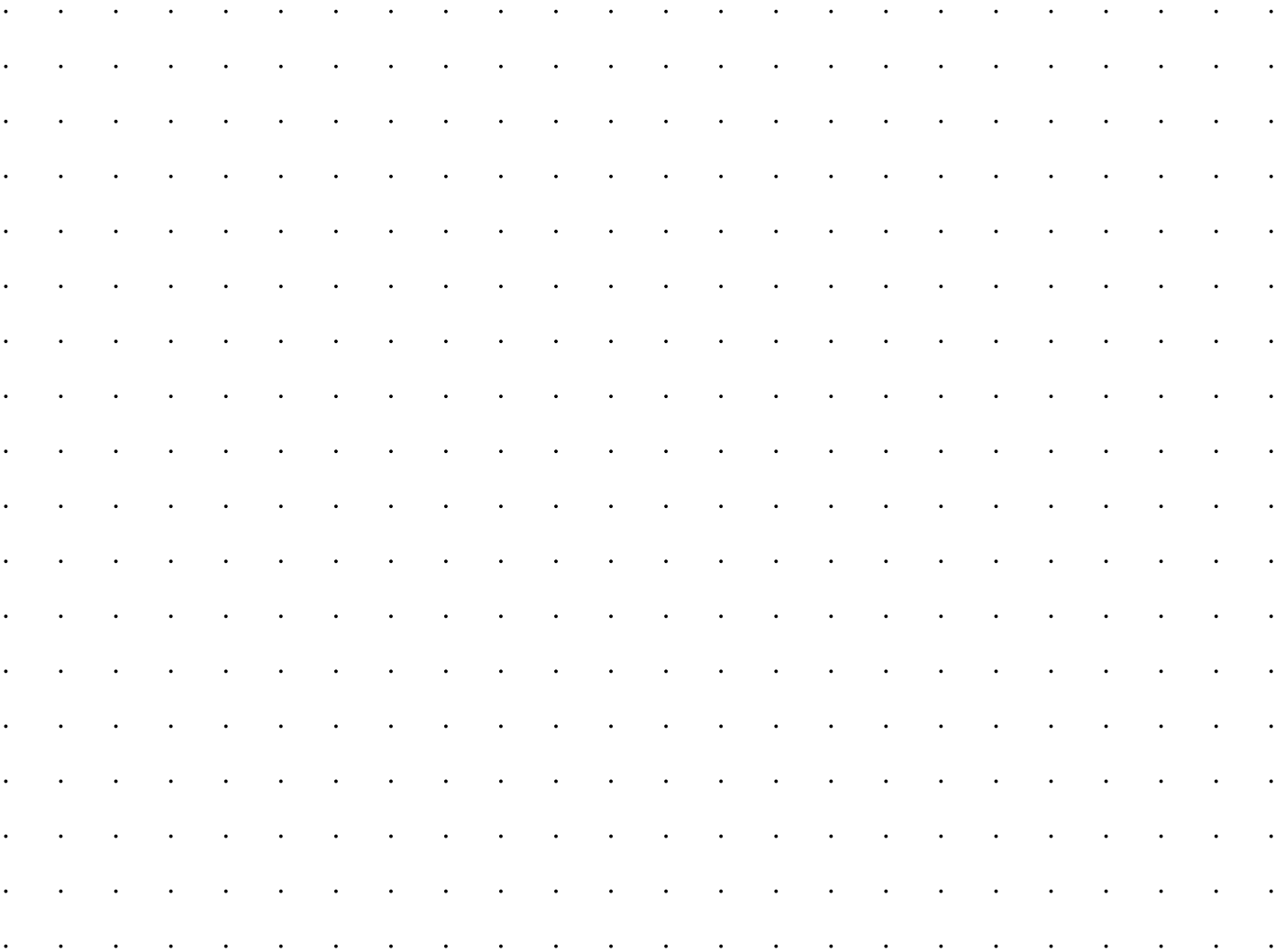
Engagement has included briefing and training activities to ensure teams within controlled entities are aware of modern slavery risks and their responsibilities in identifying and managing those risks.

Strategic procurement activities and detailed modern slavery assessments undertaken during the reporting period have included suppliers servicing Swinburne's controlled entities.

Suppliers engaged across controlled entities are included within Swinburne's supplier data sets and are captured within the University's modern slavery risk assessment tools, including the ArcBlue platform.

Engagement with significant related entities, including Swinburne Malaysia (Sarawak), has continued, with a focus on maintaining visibility of modern slavery risks and aligning approaches where appropriate.





Swinburne University of Technology

 swinburne.edu.au

General Enquiries:

 +61 3 9214 8000

Hawthorn Campus
John Street, Hawthorn
Victoria 3122 Australia

-  facebook.com/swinburneuniversityoftechnology
-  youtube.com/user/swinburne
-  instagram.com/swinburne
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