

MODERN SLAVERY STATEMENT



2025



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ACKNOWLEDGEMENT OF COUNTRY

The University of Newcastle acknowledges the traditional custodians of the lands within our footprint areas: Awabakal Nation, Darkinjung Nation, Biripai Nation, Worimi Nation, Wonnarua Nation and Eora Nation. We also pay respect to the wisdom of our Elders past and present.

ABOUT THIS STATEMENT

This Modern Slavery Statement (Statement) is made in accordance with the Australian *Modern Slavery Act 2018* (Cth). It applies to and describes the steps taken by the University of Newcastle (the University - ABN 15 736 576 735) in its entirety during the year ending 31st December 2025 to mitigate modern slavery within the University supply chains and other operations.

INTRODUCTION

In accordance with our University's commitment to human rights, we continuously improve our response to addressing modern slavery risks in our operations and supply chains. This Modern Slavery Statement reflects our commitment and fulfills the University's obligations under Part 2 of the *Modern Slavery Act 2018* (Cth) for the period 1 January 2025 to 31 December 2025. Our response to addressing modern slavery risks is facilitated by our Anti-Slavery Working Group, which includes representatives from diverse areas of the organisation and our four controlled entities. This group leads the implementation of the University's Modern Slavery Action Plan and wherever possible ensures alignment with the NSW Anti-Slavery Commissioner's Guidance on Reasonable Steps (GRS).

Our University is committed to preventing modern slavery in all its forms and ensuring that our operations and supply chains are free from any practices that contribute to it. We do this through:

- assessing areas of risk;
- working to eliminate any connections to modern slavery practices we identify;
- educating staff and students to build capacity to identify, report, and respond to red flags or actual instances of modern slavery;
- providing support for members of our community who have been affected by modern slavery; and,
- working closely with partners and suppliers with the objective of eliminating modern slavery within our sphere of influence.



MANDATORY CRITERIA

HOW THIS STATEMENT MEETS THE REPORTING REQUIREMENTS OUTLINED IN SECTION 16 OF THE ACT

a) Identify the reporting entity	Page 6
b) Describe the reporting entity's structure, operations and supply chains	Pages 7-10 and 18-21
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Pages 15-17 and 19-23
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess these risks, including due diligence and remediation processes.	Pages 21-26 and 28-33
e) Describe how the reporting entity assesses the effectiveness of these actions	Pages 28 and 34
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls. A joint statement must also describe consultation with the entity covered by the statement.	Page 6
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant: <i>A summary of our Modern Slavery Action Plan.</i>	Page 28

APPROVAL OF THIS STATEMENT

APPROVAL

Reporting Entity: University of Newcastle ABN 15 736 576 735

This Modern Slavery Statement was approved by University Council in April 2026.

Council is the principal governing body of the reporting entity as defined by the *Modern Slavery Act 2018* (Cth). The University of Newcastle is the parent entity of The University of Newcastle Research Associates Ltd (TUNRA), NUServices Pty Ltd, Newcastle University Sport (NUSport) and Newcastle Australia Institute of Higher Education Pte Ltd (NAIHE Singapore), each included in this Statement (and not otherwise reporting entities as defined by the *Modern Slavery Act 2018*). Each of the listed controlled entities were consulted in the development of this Statement, primarily through their engagement with the University's Anti-Slavery Working Group.

SIGNATURE OF RESPONSIBLE MEMBER

This Modern Slavery Statement is signed by a responsible member of the reporting entity's principal governing body (University Council).



1 May 2026

Professor Alex Zelinsky AO Vice Chancellor and President



STRUCTURE AND OPERATIONS

Since 1965, the University of Newcastle has delivered superior education and world-class research. We are Australia's largest provider of enabling programs, offering a range of alternate entry pathways to university for students from 152 countries. The University is one of the largest employers in the Hunter Region, employing around 3000 FTE staff. Across our campuses in Newcastle, the Central Coast, Sydney and Singapore, more than 39,000 students are enrolled in our programs.

We are Australia's only United Nations-affiliated university, as host of CIFAL Newcastle, a United Nations Institute for Training and Research (UNITAR) affiliated training centre.

The Newcastle Institute for Energy and Resources (NIER), Hunter Medical Research Institute (HMRI), and Institute for Regional Futures (IRF) are our flagship institutes.

The University's principal governing body is the Council. Council is responsible for acting in the

University's best interest, setting the risk appetite and driving performance through strategy and stewardship. Council operates in accordance with the *University of Newcastle Act 1989* and the *University of Newcastle By-law 2017*, which set out the powers and functions of the University and how these must be performed.

An Executive Leadership Team defines and focuses the University's strategic direction. It is a forum for the Executive to share information and provide advice to the Vice-Chancellor on matters of operational significance. It operationalises the strategic plan through business planning processes and prioritisation of operational decisions.

In 2025, our University ranked in the top 1% in the world in the QS World University Rankings. Guided by our sector-leading Wollotuka Institute, we are leaders in Indigenous education, and we are proud to be number one in the sector, with the most Aboriginal and Torres Strait Islander students of any university in the country.

THE UNIVERSITY OPERATES ACROSS THE FOLLOWING LOCATIONS:

Callaghan Campus (Newcastle)

Newcastle City Campus

Central Coast Campus – Ourimbah

Central Coast Campus - Gosford

Sydney Campus

Singapore Campus

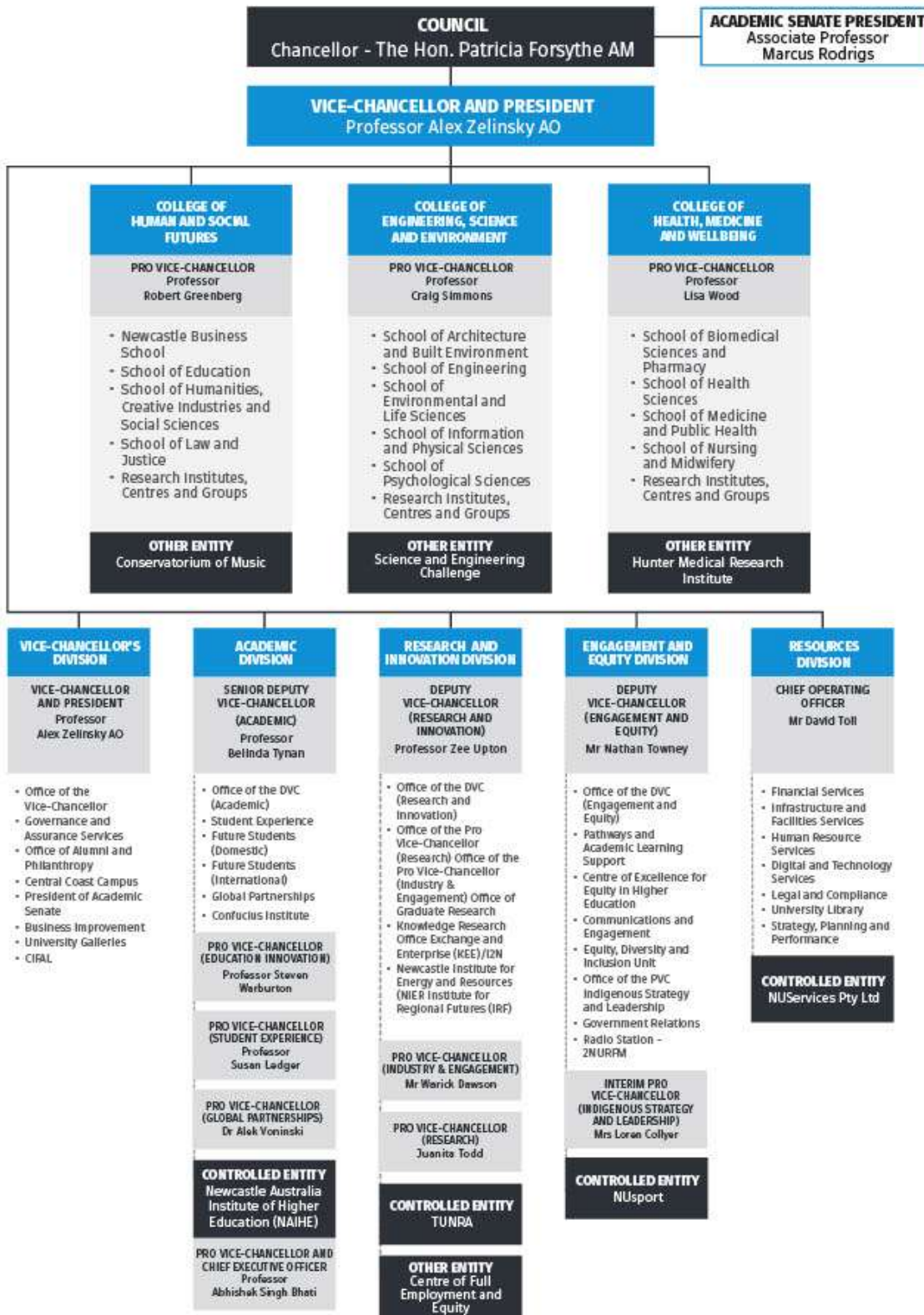
John Hunter Hospital (Newcastle)

Wallsend Hospital (Newcastle)

Regional Offices

- Orange
- Tamworth
- Taree
- Armidale
- Moree
- Coffs Harbour
- Muswellbrook (Upper Hunter)

THE UNIVERSITY OF NEWCASTLE ORGANISATION CHART



----- Dashed line denotes senior point of contact between the University and its entities

Correct as at 2 July 2025

OUR CONTROLLED ENTITIES

The University operates four controlled entities



The University of Newcastle Research Associates Limited (TUNRA)

In 1969, the University formed The University of Newcastle Research Associates (TUNRA) as a vehicle to build and promote applied research opportunities for the University and industry. As a wholly owned subsidiary of the University, TUNRA plays an important role in the University's strategy by further leveraging research capabilities and assets to create additional value for the institution. TUNRA employs around 80 staff and enables business, industry and government to connect with experts. Specific Divisions within TUNRA facilitate a wide range of services for numerous Australian and international clients. 'TUNRA Connect' provides a platform for University experts to collaborate with partners on consulting, testing services and industry short courses to deliver research led solutions. 'TUNRA Bulk Solids' (TBS) provides consulting and contract research services for the resource and process sectors.

TUNRA also hosts two key major research projects with partners ImmVirX, focused on developing novel oncolytic viruses to create powerful cancer immunotherapy combinations, and Mineral Carbon International (MCI), pioneers of carbon innovation, developing a carbon capture and use solution to transform CO₂ into saleable minerals.

In 2025, TUNRA reported an income of AUD \$13.9 million.



NUServices Pty Ltd

NUServices provides campus-based services to students, staff and the community. Services include retail, food and beverages, venue management and hire, commercial leases and University merchandise. NUServices Pty Ltd shares the University's commitment to sustainability and excellence.

In 2025, NUServices reported an income of AUD \$4.8 million.

Newcastle Australia Institute of Higher Education Pte Ltd

Established as a controlled entity of the University in 2006, UON Singapore (NAIHE) has continued to deliver and expand both its full-time and part-time programs. Our strong partnerships with leading local institutions provide our diverse range of local and international students access to a broad variety of professional networks when they graduate.

Researchers work with world-class organisations and institutions in the Singapore region and across the globe on research projects, research seminars, and faculty-specific collaborations.

In 2025, Newcastle Australia Institute of Higher Education reported an income of AUD \$22.6 million.

Newcastle University Sport (NUsport)

NUsport enables students, staff and community members to participate in sport, health, fitness and wellbeing activities through facilities, programs and services delivered from The Forum Sports and Aquatic Centre and Sports Precinct, Callaghan, The Forum Health and Wellness Centre at Honeysuckle and a pop-up gym at Ourimbah. It oversees the NUsport Performance Centre, the University of Newcastle Elite Athlete Program, University representative sport, multiple sports clubs, social sport competitions, community programs and services, including Learn to Swim programs. In 2022 NU Sport adopted the University's Procurement Policy.

In 2025, NUsport reported an income of AUD \$9.3 million.

YEAR IN REVIEW

In 2025, we welcomed representatives from 'Educating for Change' project to our Callaghan and Newcastle City campuses. The visit focused on ways to best embed training and resources across our institution, with attention to supporting key teams, staff and student groups. *Educating for Change* is a government funded initiative led by ACRATH, Flinders University and the University of South Australia, aiming to strengthen awareness and response to modern slavery and human trafficking.

We rolled out the *Educating for Change* modules to Working Group members and staff in front facing roles with international students. We engaged teaching staff in discussions to promote modern slavery training to students in legal, criminology and social work courses.

Our Anti-Slavery Working Group had four formal meetings and undertook additional projects with staff contributing valuable insights for future priorities.

We provided information to numerous suppliers and partners who are also implementing supplier assessment questionnaires for modern slavery.



SECTOR COLLABORATION

The Australasian Universities Procurement Network (AUPN) modern slavery program is a Higher Education sector-wide initiative involving 41 universities across Australia and New Zealand. The program leverages our collective spend and market influence as well as expertise to maximize purchasing power, drive ethical procurement, and ensure compliance with the *Modern Slavery Act 2018* (Cth).



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

1. Risk Data

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

2. Capability Uplift

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

3. Supplier Engagement

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

Further to this, AUPN began a detailed review into modern slavery risks in the medical gloves sector. This process builds on a review conducted in 2021 and will be finalised in 2026. In the ICT category, 22 universities participated in an Electronics Watch pilot, monitoring 27 factories across seven countries. Common risks identified included legal wages, health and safety, discrimination, excessive hours, and forced labour. Remediation is underway in 13 cases, with two instances requiring direct university engagement to resolve outstanding issues.

4. Industry Collaboration

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

In 2025, 18 universities contributed over 150 student responses to the temporary migrant survey, building an evidence base for future action. Key outcomes include a new project focused on the development of sector-wide guidance, due to be completed in 2026, increased recognition of university responsibility, and identification of barriers. In 2025, the sector brought together 11 Universities for the International Student Risk Roundtable, bringing together university stakeholders and experts address risks which face students across their journey, from recruitment outside of Australia to their experiences on our campuses.

5. Third Party Support

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

ELECTRONICS WATCH PILOT

DEEPER ELECTRONIC TIER DUE DILIGENCE



*Electronics Watch (EW) helps public buyers work together to identify exploitation in factories via ongoing worker monitoring. They provide worker education, negotiation with factory owners for better working in **global electronics supply chains** and regular monitoring reports for buyers.*

Universities are piloting a coordinated sector-wide engagement model to address identified issues in our electronics supply chain, representing the first global trial of its kind with Electronics Watch.

Metric	Result
Universities Participating	22
Products Submitted	81
Total Spend	\$21.3 million*
Tier 1 Supplier Identified	66
Factories Mapped	27
Countries Represented	Bolivia, China, Taiwan, India, Malaysia, Vietnam, Thailand
Very High Risk Factories Located	China, Taiwan, Malaysia, Thailand
Common Risk Themes	Legal Wages, Occupational Health & Safety, Discrimination in hiring & occupation, Excessive working hours, Forced labour, Recruitment & employment conditions
Universities that received an initial risk assessment report	18
Remediation underway	13 cases under remediation via EW (no university action required)
University Engagement Q2 2025	2 cases requiring university engagement

*20 universities data only across 3 products

MODERN SLAVERY RISK IN OUR OPERATIONS AND SUPPLY CHAINS

Modern slavery is a global issue. The nature and extent of modern slavery mean there is a high risk that it may be present in many industries and sectors, including higher education. Universities in Australia have been found to have supply chains that include goods and services from countries where slavery and exploitation are prevalent. This means our University is statistically at risk of supporting or benefiting from modern slavery practices.

Some of the specific risks in an Australian university include:

Labour exploitation:

Universities may use contractors who engage in exploitative labour practices, such as paying workers below minimum wage or forcing them to work in hazardous conditions. Industries such as cleaning can be higher risk.

Procurement of goods:

Universities may purchase goods and services from suppliers who engage in modern slavery practices, such as forced labour, debt bondage, or human trafficking. Such practices may be more difficult to detect if they are further down the supply chain. Some areas of spending that present very high risk include new build works, temporary labour, laboratory consumables, scientific equipment, and marketing and promotional items.



Student exploitation:

International students can be particularly vulnerable to modern slavery for a number of reasons, including:

- language and cultural barriers and social isolation;
- restrictions on working hours that combine with cost-of-living pressures to incentivise riskier work and tolerance of abuse, harassment, discrimination or coercion in the workplace, as well as underpayment;
- limited willingness to speak up often due to concerns about potential loss of visa status or retaliation against themselves or their families;
- a limited understanding of Australian workplace and immigration regulations and rights; and,
- limited access to support from civil society, unions and government.

Domestic students can also be vulnerable to labour exploitation involving dangerous or substandard working conditions that infringe upon their rights. This includes situations directly linked to the University. For example, higher degree research students could be asked or pressured to perform unpaid work associated with their supervisor's research or personal interests.

While some of the above examples may not amount to modern slavery, such forms of exploitation are still unacceptable at the University. Modern-slavery risks are identified through the Anti-Slavery Working Group with actions designed to address areas of most risk. From time to time, the Anti-Slavery Working Group also develops strategies where simple steps can be taken to prevent or address some of the less extreme forms of exploitation that could potentially impact the University community.

We regularly and seriously assess the risk that our University is causing, contributing to, or being directly linked to modern slavery.

Risk that we may cause modern slavery :

Our existing processes for recruitment, employee management, labour hire, contract management, and volunteering roles have strong protections for individuals in relation to exploited labour. One area of risk for us, however, is the potential for our students– particularly international higher degree research students–to be manipulated into undertaking unfair unpaid work associated with the University. This is an area of focus for our Anti-Slavery Working Group. It is our aim that educational materials, Codes of Conduct and the support services provided to our students and student-facing staff will ensure any such instances are promptly identified, reported and acted upon.

Risk that we may contribute to modern slavery practice:

We have considered the risks that our University may be involved in acts or omissions that facilitate or incentivise modern slavery. This was an important consideration when recently awarding a cleaning contract to a new supplier. This new partnership is with a contractor certified under the Cleaning Accountability Framework (CAF) 3-Star Prequalification, ensuring compliance with ethical labour standards, and reducing modern slavery risks within the high-risk cleaning services category.

Another example of ways we try to minimise the risk of contributing to modern slavery is when setting targets, timeframes and contract conditions for construction suppliers. We aim to ensure we are not inadvertently limiting ourselves to suppliers that must rely upon exploited labour to deliver projects for us.

Risk that we may be directly linked to modern slavery practice:

This remains a primary focus for our Anti-Slavery Working Group. We have made significant progress in strengthening our review processes for partner and supplier activities, working to minimise the risk of any association with modern slavery practices.

With some support and guidance from the AUPN, we consider our spend for the year, our suppliers, products and services sourced, the countries within our supply chain, and the various commodities within that chain. For example, we have a significant spend in the area of electronic goods, which is consistent with other universities.

We accept there is a strong possibility that electronic goods we purchase could be manufactured by an entity that uses minerals sourced from a third entity which could have been mined by a fourth entity that uses forced labour. This risk highlights the importance of the University's decision to enhance its due diligence processes – including collecting additional information from suppliers, incorporating modern slavery clauses into contracts, and implementing other preventative measures.



SUPPLY CHAIN

OVERVIEW

The total non-salary spend for the University in 2025 was **\$459.8 million**. The University and its controlled entities engaged directly with **3289 trade creditors** (suppliers), of which **427 were based outside of Australia**.

The University of Newcastle assessed its 2730 suppliers for risk of modern slavery by applying the **Global Slavery Index (GSI)** to the yearly data. The GSI presents national estimates of the scope and composition of modern slavery for 160 countries, providing deep insight into the scale and composition of modern slavery today. Our 2025 spend data highlights that **154 suppliers make up 80% of total University spend** on third party goods and services. When risk analysis was conducted on the University's suppliers based on total spend, we found that **94%** of third-party goods and services is with suppliers based in **low-risk countries** as defined by the Global Slavery Index.

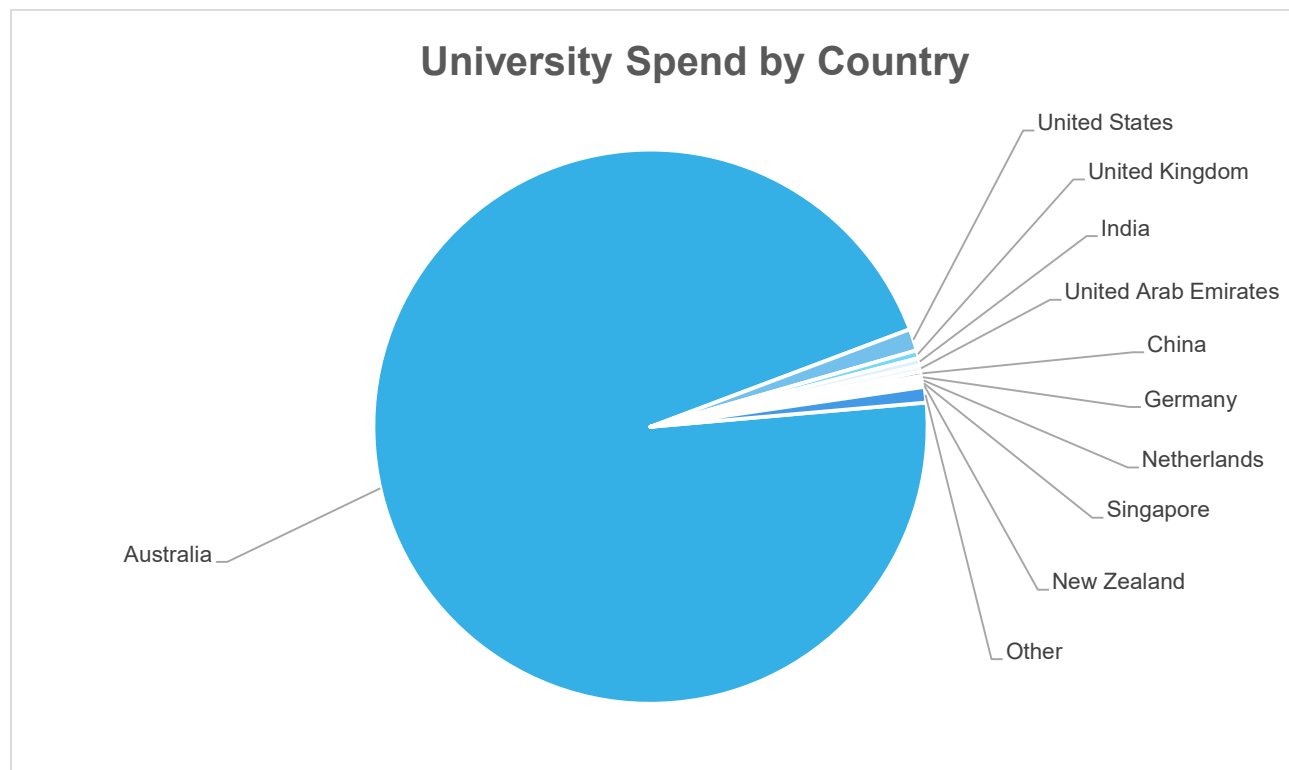


Chart 1: University Spend, by Country 2025

We analysed the University's spending by recorded product category and calculated the total value in high-risk areas, as shown in the next chart.

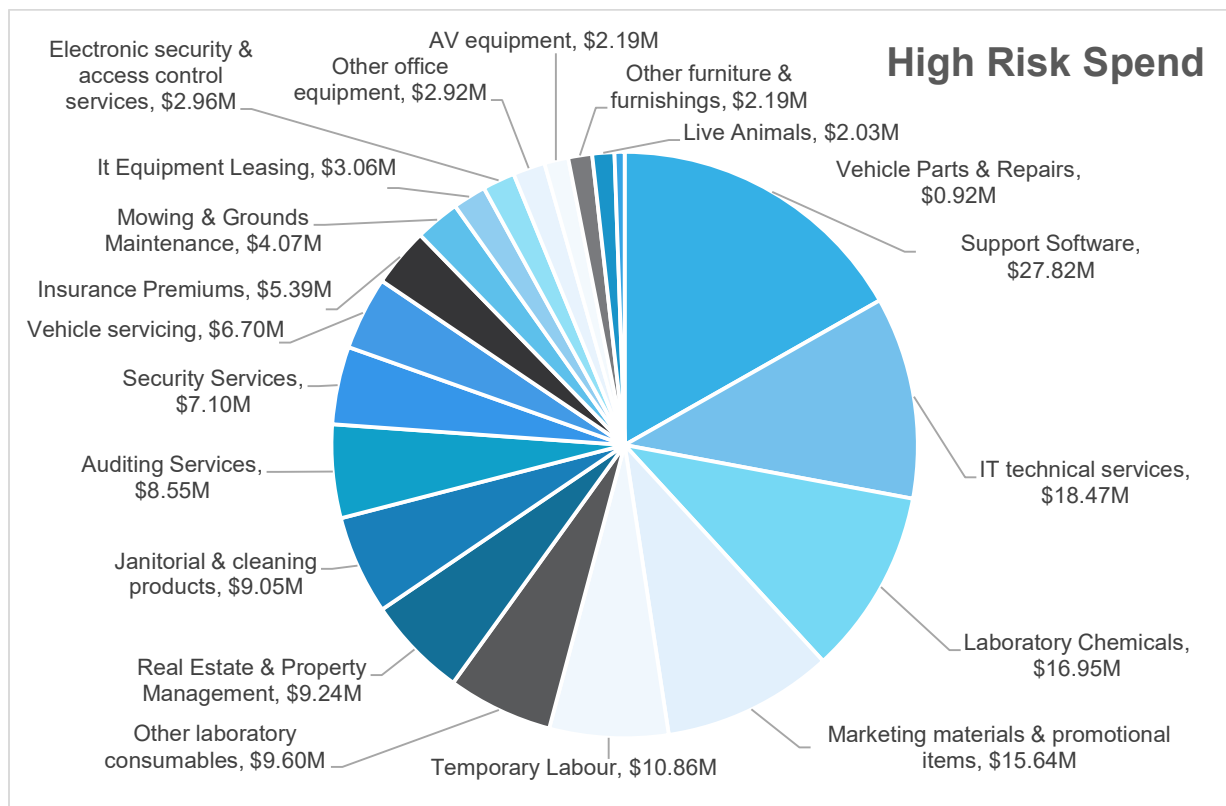


Chart 2: High-Risk Spend, by Category, 2025

RISKS AND IMPACTS

COUNTRY OF ORIGIN RISK IN OUR SUPPLY CHAIN

The University of Newcastle acknowledges that it is likely to be exposed to some level of modern slavery risk in its supply chains - millions of people in the Asia Pacific are engaged in forced labour as an example of our potential exposure. We purchased products in multiple high risk product categories in order to undertake our education and research, and at this stage, most of our analysis only focuses on tier one suppliers. In 2025, the University did not record any spend in a country categorised as extreme risk however.

Our controlled entity, NAIHE, located in Singapore, has a distinct risk profile. Generally, there are potential labour risks associated with migrant workers in Singapore, especially those hired by contractors for construction work. The Global Slavery Index profile for Singapore indicates that some of these workers may find it challenging to leave abusive employers without risking visa loss, deportation, or forfeiting security deposits. NAIHE are committed to preventing and eradicating these practices in their operations.

International Spend in High-Risk Countries

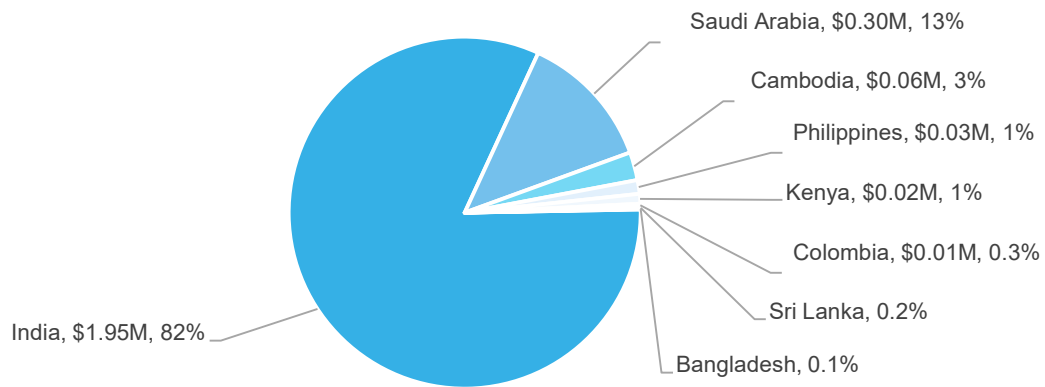


Chart 3: Total High-Risk Country Spend by Country, 2025

International High-Risk Product Spend

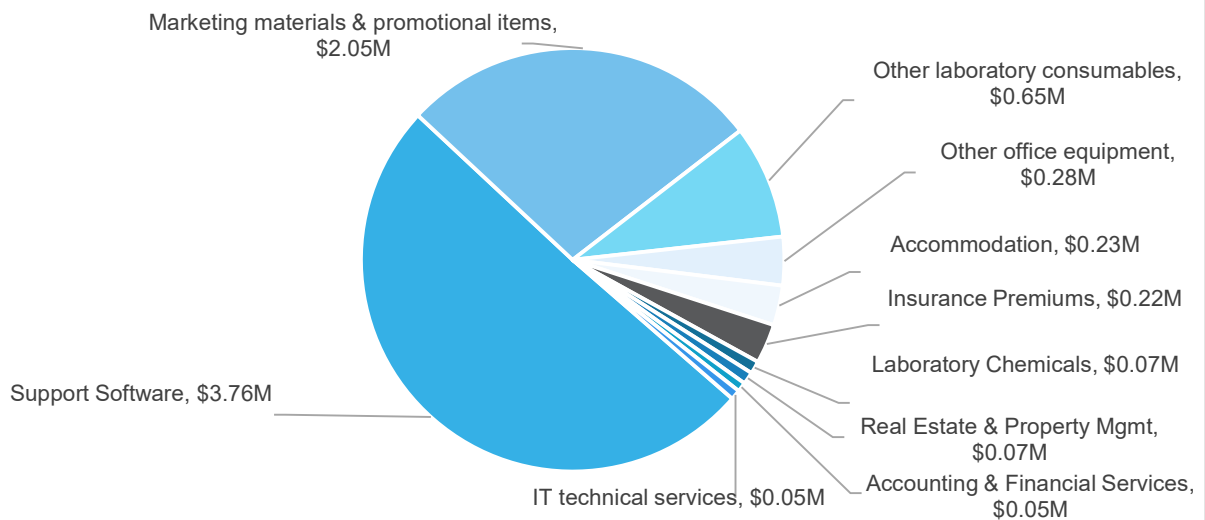


Chart 4: International High-Risk Spend, by Category, 2025

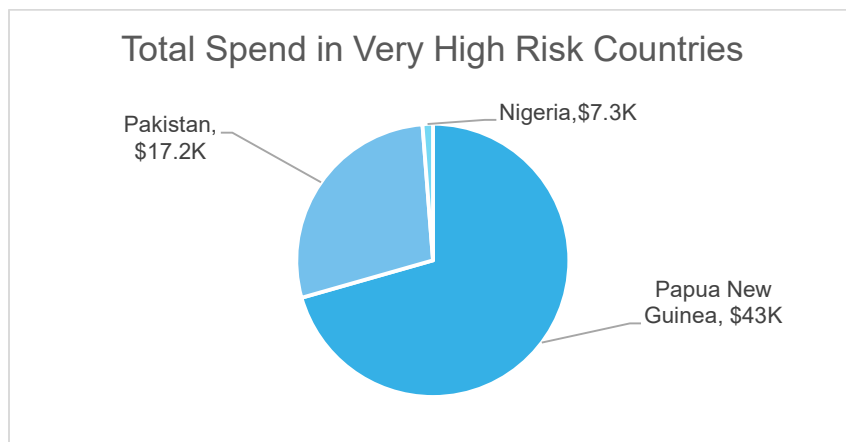


Chart 5: Very High-Risk Spend, by Country, 2025

Our University spent **\$2.98M** in countries classified as high risk or very high risk. Of those countries classified as high risk, the vast majority (95%) of this spend was in India and Saudi Arabia, mostly related to student placements, marketing, advertising and airfares. Only \$609K was spent in countries categorised as **very** high risk, and that spend was in Nigeria, Pakistan and Papua New Guinea. An example of the deep dives we do in relation to suppliers in very high-risk countries is presented in a case study below.

In early 2026 we also forwarded our 2025 spend data to the Australasian Universities Procurement Network to be uploaded into the ArcBlue software for deeper analysis. Through this process we identified 26 individual suppliers rated as very high risk. The supplier risk ratings generated within this system consider factors beyond generalised country risk and product risk and are helping us to identify further opportunities for improvement or action.

CASE STUDY

RISKS ASSOCIATED WITH ENGAGING STUDY ABROAD CONSULTANTS IN HIGH-RISK COUNTRIES

The practice of engaging study abroad consultants in Pakistan presents a complex risk landscape, shaped by regulatory gaps, widespread fraudulent activity, financial exploitation, and limited institutional oversight. Understanding these risks is critical for the University to ensure there is no human exploitation present in its pathways to education in Australia.

A defining feature of the Pakistani study abroad consultancy market is the absence of a mandatory licensing system, which leaves the sector largely unregulated. As a result, anyone can legally operate as a consultant, creating an environment in which inexperienced, unethical, or fraudulent operators can potentially enter the market.

This weak regulatory framework has contributed to a significant rise in fraud cases involving study abroad companies. Students report a range of abuses, including agents taking substantial fees but

failing to file applications, issuing fake admission letters, misappropriating tuition funds, or failing to submit tuition payments to foreign institutions altogether.

Financial exploitation is among the most common risks, especially because the industry lacks uniform pricing standards. In the unregulated sector, many consultants charge exorbitant “service fees,” considered major red flags by international advisory bodies. Some consultants may also encourage students to pay tuition or deposits into personal or unofficial accounts, creating opportunities for misappropriation and leaving families with little chance of reimbursement.

Another prominent risk is misrepresentation of credentials or partnerships. Some consultants falsely claim to be authorised agents of foreign universities, making promises they cannot fulfil. Students may only learn of these misrepresentations when universities reject their applications or deny having any association with the consultant in question.

Data privacy concerns also figure prominently in the risk profile of the sector. Students routinely provide consultants with sensitive personal information, including passports, academic records, bank statements, and property documentation required for visa processing. In an unregulated environment with no enforceable privacy standards, the potential for misuse of sensitive information remains a significant area of concern.

Furthermore, inaccurate visa advice poses serious risks. Some consultants provide misleading assurances of “guaranteed visas,” a practice widely recognised as fraudulent. Others may improperly prepare visa files or fail to submit them at all, directly contributing to visa denials and financial loss.

The enforcement mechanism in Pakistan is reactive and fraudulent operators often rebrand and reopen under new names, making it difficult for overseas universities and prospective students to seek recourse.

SUPPLIER INITIALLY ASSESSED AS VERY HIGH RISK

One of the 26 University suppliers rated as very high risk (by the ARCBlue risk assessment) is a study abroad consultant in Pakistan known as **ABN Overseas Education Pakistan**.

ABN Overseas Education Pakistan (**ABN**) is a well-established overseas education consultancy that has operated within the Pakistani student recruitment landscape for over a decade. The University engages ABN to facilitate the placement of students from Pakistan into its programs and campuses.

A structured due diligence review was conducted to determine whether ABN or any of its key personnel appear in adverse news reports, regulatory notices, or public interest enforcement actions. An adverse media assessment found no connection to modern slavery, no negative news, no investigations, legal actions, or regulatory findings implicating ABN or its directors and consultants in Pakistan or elsewhere.

Overall, ABN comes across as a large, long standing organisation with identifiable leadership, sustained market presence, multi city accessibility, and no adverse news findings. Since ABN shows no direct negative indicators but operates in a high-risk sector, the University regards a moderate residual risk rating is the most accurate and balanced assessment. This assessment indicates that although ABN itself has not raised any specific red flags, suppliers operating in high-risk countries necessitate

enhanced due diligence by the University. Particular attention should be given to fee structures, document management, and verification of university agent status.

Hence, the University will continue to monitor ABN as part of its continuous “Supplier Due Diligence” program to ensure that any potential risk of modern slavery is identified and assessed, should such a risk materialise. In addition, the University will place other high-risk, study-abroad consultancies with which it collaborates, under the same comprehensive and continuous supplier due diligence.

CASE STUDY

CLEANING CONTRACTOR PROCUREMENT: MENZIES

The University has identified cleaning as an area where there is a significant risk for modern slavery due to complex subcontracting chains, a vulnerable workforce, consisting of international students and temporary visa holders, and industry price pressures which may lead to wage theft and unsafe practices.

To ensure modern slavery risks are identified and managed, the University recently undertook a thorough procurement process that considered modern slavery risk. The selected provider of cleaning services to the University is Menzies, a Cleaning Accountability Framework (CAF) 3 Star. As a CAF 3 Star, Menzies has met strong compliance standards such as Fair Work compliance, transparent subcontracting practices and worker engagement and grievance mechanism.

The Cleaning Accountability Framework has been recognised by business, human rights and corporate social responsibility experts as a leading initiative regarding anti-slavery in supply chains. CAF Membership and Certification is at the cutting edge of human rights due diligence to address modern slavery risk.

Menzies has committed to carry out annual supply chain mapping and risk assessments in respect of their supply chain and obtain statements of compliance with evidence against the *Modern Slavery Act 2018* (Cth). The University will review the statements of compliance to ensure that there is no evidence of human exploitation within Menzies’ supply chain.

MITIGATION

The University employs a range of controls to manage any potential or actual risks of modern slavery within both its operations and supply chain.

POLICY AND PROCEDURE

The policies and procedures are available to all staff and relevant training is provided where responsible parties are directly involved and accountable.

Policy / Procedure	
Staff Code of Conduct	Sets behavioural expectations including ethical obligations
Enterprise Agreements	Ensure lawful workplace obligations are met for Professional Staff and Academic Staff.
Procurement Policy	Contains ethical obligations that must be met when procuring goods and services on behalf of the University.
Complaint Management Policy and Procedure	Establishes how the University will manage and assess formal complaints and grievances.
Ethical Framework	Guides and supports decision-making at all levels. Intended to be a 'compass' for navigating the University's complex ethical landscape.
Engagement of Contractors and Consultants Procedure	Sets out risk mitigation strategies when engaging contractors and consultants.
Risk Management Framework	Sets out the University's commitment to managing risk and outlines key roles and responsibilities.
Support for Students Policy	Outlines mechanisms for ensuring that students are aware of relevant support services.
Modern Slavery Policy	Framework for a strong response to modern slavery risk through a University-wide approach.

PROBITY PRINCIPLES

University staff are required to consider the following through all stages of the procurement process:

- Open competitive process
- Fairness, consistency and transparency
- Identification and resolution of conflicts of interest
- Accountable decision making
- Monitoring and evaluating performance

CONTRACT CLAUSES

The University has embedded Modern Slavery compliance into its standard contracts. Following is an excerpt of a modern slavery clause in contracts for the procurement of goods and/or services.

Compliance

The Supplier must ensure that:

(a) in performing its obligations in connection with this document, the Supplier and its Representatives:
(i) do not engage in any conduct or omission which may contravene any Modern Slavery Laws; and
(ii) comply with any University Policies relating to modern slavery;(b) it does all things required or necessary to mitigate or reduce modern slavery risks in its operations and supply chains and stay in compliance with all applicable Modern Slavery Laws; and(c) the terms of the contractual commitment entered into with any personnel engaged by the Supplier to provide goods or services in connection with this Agreement, permit termination of commitments where the Supplier has reasonable grounds to believe there has been or is likely to be a breach of any applicable Modern Slavery Laws.

Obligations

The Supplier must:

(a) promptly notify the University if it becomes aware of a possible, potential, suspected or actual breach by it or its Representatives of any Modern Slavery Laws;
(b) cooperate in good faith with the University in investigating the circumstances relevant to any possible, potential, suspected or actual breach of any Modern Slavery Laws, whether or not notification has been given under clause (a);
(c) give assistance and access to the agreements and the Supplier Representative as the University may reasonably require under clause 43.3 and must provide (at the Supplier's cost) all reasonable assistance (including the provision of information) to the University to allow the University to comply with its obligations under the Modern Slavery Laws;
(d) establish and maintain policies and procedures to ensure that the Supplier and the Supplier Representative comply with the obligations set out in this clause 43.

The Supplier must ensure that its policies and procedures as contemplated in this clause (d) contain requirements that training will be provided to the Supplier Representative, as the case may be, in relation to the matters addressed by those policies and procedures; and require its suppliers to implement their own binding guidelines for ethical behaviour and compliance with Modern Slavery Laws.

ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

The University's Anti-Slavery Working Group met four times in 2025 with subgroups of members working on various initiatives between meetings. Progress against the Action Plan was tracked (see following page).

Supply Chain Risks

We continued our robust and systematic approach to managing modern slavery risks in our supply chains. To reduce the risk that goods and services procured were a product of modern slavery, we have:

- Embedded modern slavery clauses across all standard forms of contracts with suppliers and service providers.
- Implemented a Supplier Code of Conduct that explicitly addresses modern slavery expectations.
- Conducted modern slavery risk assessments for all procurement activities valued over \$250,000 using the NSW Anti-Slavery Commissioner's GRS Inherent Risk Identification Tool (procurements flagged with a 'heightened' modern slavery risk undergo additional evaluation, including assessment against weighted criteria for supplier responses to Modern Slavery schedules).
- Integrated modern slavery considerations within the University's Investment Policy and conducting ESG reviews to assess and mitigate risks across the investment portfolio.
- Undertaken work to expand modern slavery training to all staff involved in procurement and contract management.
- Increased sourcing and partnerships with local, small, and medium enterprises (SMEs) that meet ethical labour standards, supporting community development while reducing modern slavery risks.
- Engaged a cleaning services contractor certified under the Cleaning Accountability Framework (CAF) 3-Star Prequalification, ensuring compliance with ethical labour standards, and reducing modern slavery risks within the high-risk cleaning services category.
- Collaborated with the Australian Universities Procurement Network (AUPN) Anti-Slavery Working Group to promote knowledge sharing and strategies for addressing modern slavery, aggregate sector wide procurement data for trend analysis and shared risk management and leverage sector wide supply chain risk management platforms, to monitor and address inherent risks.

How we are addressing the risk presented to our vulnerable student cohorts (particularly international students):

We have a number of initiatives that aim to provide international students with information to help them understand safe and respectful relationships and avoid and report exploitative arrangements.

The International Student Support Team recently reviewed and updated our comprehensive Orientation and Onboarding Program, consisting of five thorough pre-arrival modules which students coming to Australia to study are required to complete before their arrival. The University's Student

Wellbeing Team reviewed and updated our 'International Student Survival Guide' in booklet form, which is provided to arriving students.

The type of information provided to students through these resources includes: ways to deal with situations where employment and accommodation leases are linked or there are cash-in-hand working arrangements; information around the Australian regulatory framework governing employment and Awards and their rights as an Australian worker; sources of help available to them, such as support services, legal services available, and how they can contact the Fair Work Ombudsman, national Student Ombudsman and International Student Ombudsman.

International Student Support partner with the Careers Service, Campus Care and external agencies to support international students who may want to raise issues, be connected with services, or potentially make formal reports related to modern slavery practices or situations. Further specialist support is available to students through the International House Drop-In Centre, Wellbeing Services (counselling and prevention services and our Student Advocates) as well as the Chaplaincy Service.

We have ensured representation on our Anti-Slavery Working Group includes members in critical student facing roles.

We have rolled out the *Educating for Change* Modules for key student facing staff to increase their understanding of modern slavery risks and red flags so they can best detect and support students who may be at increased risk or already experiencing serious exploitation.



2026 ACTION PLAN

Action / Activity	Success Measure	In Place	In Development
Modern slavery training	Completion rates of the procurement module and Educating for Change module/s where mandated; and Educating for Change modules where offered.	X	
Modern slavery awareness across the University	Informed workforce and student groups. Click through rates for resources provided to staff. Courses have Educating for Change Modules embedded into course materials.		X
Ongoing review of relevant policies and procedures	Compliance with policy review schedule. Processes and practices referenced are aligned to policies and procedures. Future Action: Contract Policy to be updated with Modern Slavery Due Diligence.	X	
Functioning Anti-slavery Working Group	Group membership represents a cross section of University staff that implement an action plan.	X	
Risk mitigation – supplier risk assessments, data & reporting	Identified suppliers (high-risk industry and/or high-risk location) will provide their MS statements and other info for assessment – as linked to new Contract Lifecycle Management system. Reporting on non-compliance by suppliers.		X Go live Sep 2026
Risk mitigation – international student risk	Informed and engaged staff in student support roles can identify red flags and support/refer. Informed and engaged students: Student leader groups involved in AFP human trafficking education session and engaged in strategies to detect and support potential victims.		X
Contract conditions – University Contract Templates	Modern slavery clauses and provisions are incorporated into all University contract templates.	X	
Contract conditions – Supplier Contracts	Data on modern slavery clauses and provisions in supplier contracts reviewed/assessed for risk exposure.		X
Procurement Returnable Schedules	Updated to align with the implementation of the new Contract Lifecycle Management System.		X
Sector benchmarking and collaboration	Attendance at University Anti-Slavery Forums. Participation in AUPN Working Groups.	X	
Assessment of all suppliers categorised as very high risk	Use 2025 data available in ARCBlue Portal provided by the AUPN to assess and monitor suppliers who have been initially classified as very high risk.	X	

DUE DILIGENCE

Due Diligence is a cornerstone of the University's Risk Framework and is incorporated into all we do across the business. The University considers how it may cause, contribute to, or be directly linked to modern slavery practices and its ongoing risk management process of human rights diligence aims to identify, prevent, and mitigate adverse impacts.

ArcBlue software provided via our AUPN membership offers a risk assessment solution relevant to the University's supply chain for products, countries, industries, and suppliers. It allows the University to stay on top of risk through data visualisations, reports, and alerts. We have visibility of end- to-end supply chains to identify possible risks.

Our continuous review of policies and procedures ensures we are on target for meeting our obligations.

We have Enterprise Agreements to protect our staff from exploitation, unfair work practices, conditions or environments.

Our Staff Code of Conduct ensures compliance with ethical standards, legal obligations and other University expectations and commitments. Our Supplier Code of Conduct helps to control supplier risk.

Modern slavery risk is described within the Operational Risk Profile for Strategic Procurement. Risk events and associated controls will be identified and documented across all Divisions and Colleges as relevant.

Supplier Self-Assessment Questionnaires allow suppliers to identify any real or potential breaches of *Modern Slavery Act 2018*; and a Code of Conduct for Suppliers helps to ensure they abide by the University's expectations.

Partnerships are crucial. The University works with its suppliers to identify any breaches and continues to work with them to mitigate any risks collaboratively.

The availability of the '*Educating for Change*' training modules has ensured staff will be better equipped to identify and respond to modern slavery risk. Staff who procure goods on behalf of the University, and those who work in front-line roles in services for international students, will continue to be particularly targeted for training.

We are working to ensure our international students are informed about modern slavery related risks and are aware of support services available to reduce their risk of exploitation, or to support themselves or student colleagues in risky or unsafe situations.

Our collaborative engagement with the AUPN will strengthen our ability to identify potential or real risks for our sector.

SUPPLIER CODE OF CONDUCT

The University is committed to understanding and managing social, ethical and environmental issues along its supply chain responsibly. The Supplier Code of Conduct outlines the minimum terms and conditions of doing business with the University.

The Supplier Code of Conduct is mandatory for all suppliers, including:

- construction vendors;
- ICT vendors;
- research vendors and partners including those subject to a Funding Agreement; and
- all procurement vendors.

SOME KEY FEATURES OF THE SUPPLIER CODE OF CONDUCT

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic Child labour is not used
- Living wages are paid
- Working hours are not excessive
- No harsh or inhumane treatment is used

The University requires these suppliers comply with the standards set out in the Code and work with the University to assess and manage compliance in their supply chain.

The Code is based on the University's own Ethical Framework and the Ethical Trading Initiative (ETI) Base Code.

Contractors working for the University have reporting channels available under the University's Public Interest Disclosure Policy, and the NSW Independent Commission Against Corruption (ICAC) in instances of actual or suspected fraud, corruption, misconduct or maladministration.

SUPPLIER ANALYSIS IN CONTROLLED ENTITIES

Our controlled entities are committed to detecting and addressing modern slavery risk in their supply chains. For significant procurement activities, they follow University procedures.

CONTROLLED ENTITY: NUSERVICES PTY LTD

NUserives manages on-campus commercial activities, campus services and amenities (such as food services and dining). NUserives takes its commitments to trade ethically and to protect human rights in the supply chain very seriously, having a rigorous supplier onboarding process and meticulous risk-assessment processes guaranteeing high standards when it comes to working conditions, environmental impact, and sustainability.

When undertaking procurement direct from suppliers in high-risk countries and high-risk procurement categories, NUserives look for the following supplier accreditations when undertaking due diligence:

SGS Certification: SGS are one of the world's leading inspection, verification, testing and certification company. The SGS certification process involves factory inspections and can be relied upon to verify claims made by overseas suppliers. We insist upon SGS certification to ensure adequate working conditions when undertaking procurement in high-risk product categories and from high-risk countries.

ISO 45001 Certification: ISO 45001 is the worldwide accepted standard and contains requirements for a healthy and safety management system regarding work conditions. A company who demonstrates they have held ISO45001 certification over a long period of time (several years or more) demonstrates a commitment to adequate work conditions and guarantees zero tolerance for slavery-like conditions, forced labour, or child labour.

SAI SA8000 Certification: SA8000 is one of the world's leading social certification programs. The standard and rigorous certification program provides a framework for suppliers to conduct business in a way that is fair and decent for workers. SA8000 Certification ensures a supplier is compliant with International Labour Organisation (ILO) conventions and international human rights law as set out in the UN Declaration of Human Rights.

In addition to externally recognised certification programs, Nuservices also participate in meaningful and credible supplier engagement and follow key University policies including the University Staff Code of Conduct, Procurement Policy and Ethical Framework.

CONTROLLED ENTITY: NUSPORT

NUsport is responsible for The Forum venues based at The University of Newcastle Callaghan Campus and at Harbourside in the Newcastle Honeysuckle precinct. The Forum is a leader in providing quality health, fitness, sport & recreation services to its Newcastle community and surrounds.

NUsport takes its commitments to trade ethically seriously, ensuring that human rights are upheld, dignity is respected, and all individuals are free from exploitation. Aligning with University of Newcastle Procurement Policy, NUsport ensures that its supply chains are transparent and at low risk of forced labour, human trafficking, and child labour.

Furthermore, Nusport makes a firm commitment to raise awareness of modern slavery risks and promote a culture of accountability. Ethical practices also include collaborating with stakeholders, to combat modern slavery on a broader scale, ensuring that all people can live and work freely – without fear of exploitation.

When undertaking procurement direct from suppliers in high-risk countries and high-risk procurement categories, NUsport verifies supplier compliance with the following supplier accreditations when undertaking due diligence: SGS Certification, ISO 45001 Certification and SAI SA8000 Certification.

OUR INTERNATIONAL STUDENTS

The University of Newcastle recognises that international students face increased risks of exploitation in various aspects like employment, accommodation, and situations involving debt bondage. To address these concerns and mitigate the vulnerabilities faced by our international students, the International Student Support (ISS) Team has implemented a comprehensive Orientation and Onboarding Program. It consists of five thorough pre-arrival modules, which students coming to Australia for study are required to complete before their arrival. Additionally, the University's Student Wellbeing Team developed an '*International Student Survival Guide*' in booklet form, that is provided to arriving students from Semester 1.

These initiatives provide international students with information to help them understand safe and respectful relationships, avoid arrangements where employment and accommodation leases are linked, avoid cash-in-hand work, understand the Australian regulatory framework governing employment and Awards, and their rights as an Australian worker. Students are made aware of sources such as the internal and external support services available to them, legal services available, and how to contact the Fair Work Ombudsman and International Student Ombudsman.

ISS also partners with the Careers Service, Campus Care and external agencies to support international students who may want to raise issues, be connected with services, or potentially make formal reports related to modern slavery practices or situations. Further specialist support is available to students through the International House Drop-In Centre, Wellbeing Services (counselling and prevention) and other resources such as the Chaplaincy Service. Key staff complete the Modern Slavery training modules provided by 'Educating for Change'.

RESPONSIBLE INVESTING

OUR APPROACH

The University's Investment Policy outlines an ESG Framework that directs our investment strategy. This ESG Framework sets out the University's overall philosophy, commitment and methodology for addressing environmental, social, and governance (ESG) factors within our investment portfolio.

The University has appointed Mercer Investments (Australia) Limited (MIAL) as its Implemented Consultant. MIAL is also the Responsible Entity of the Mercer Funds. Mercer is a signatory to the United Nations Principles of Responsible Investment and has more than 20 years of experience globally in advising clients on ESG matters. Where the University invests in Mercer Funds, MIAL draws on its own expertise and that of Mercer's local and global manager research teams in selecting and appointing one or more third-party investment managers (Investment Managers) to invest Mercer Fund assets. Each Mercer Fund's offer document summarises the ESG technique/s applicable to that Mercer Fund.

MIAL's sustainable investment approach has included consideration of modern slavery as an important human rights issue for many years. This includes assessing and addressing modern slavery risk alongside other key ESG risks, through portfolio assessments, Investment Manager engagements and industry collaborative initiatives. Examples of this include:

- Conducting portfolio assessments for potential modern slavery risk across the Mercer Funds using third-party ESG data from ISS ESG.
- Conducting an annual engagement survey of all Investment Managers globally, which includes a section covering human rights including modern slavery.
- Conducting follow-up engagement with a selected group of Investment Managers, based on the results of the portfolio assessments and annual engagement surveys, to encourage ongoing improvement.
- Continued participation in collaborative initiatives such as the:
 - Investors Against Slavery and Trafficking Asia-Pacific an investor-led, multi-stakeholder project seeking to promote effective action in finding, fixing and preventing modern slavery in operations and supply chains.
 - Human Rights Industry Working Group led by Responsible Investment Association of Australia, seeking to promote good practice among investors in relation to understanding and managing human rights issues in investments, including modern slavery.

During the latest ESG review completed by MIAL, there were no exclusion breaches or high severity modern slavery red flags relevant to the University's investments.

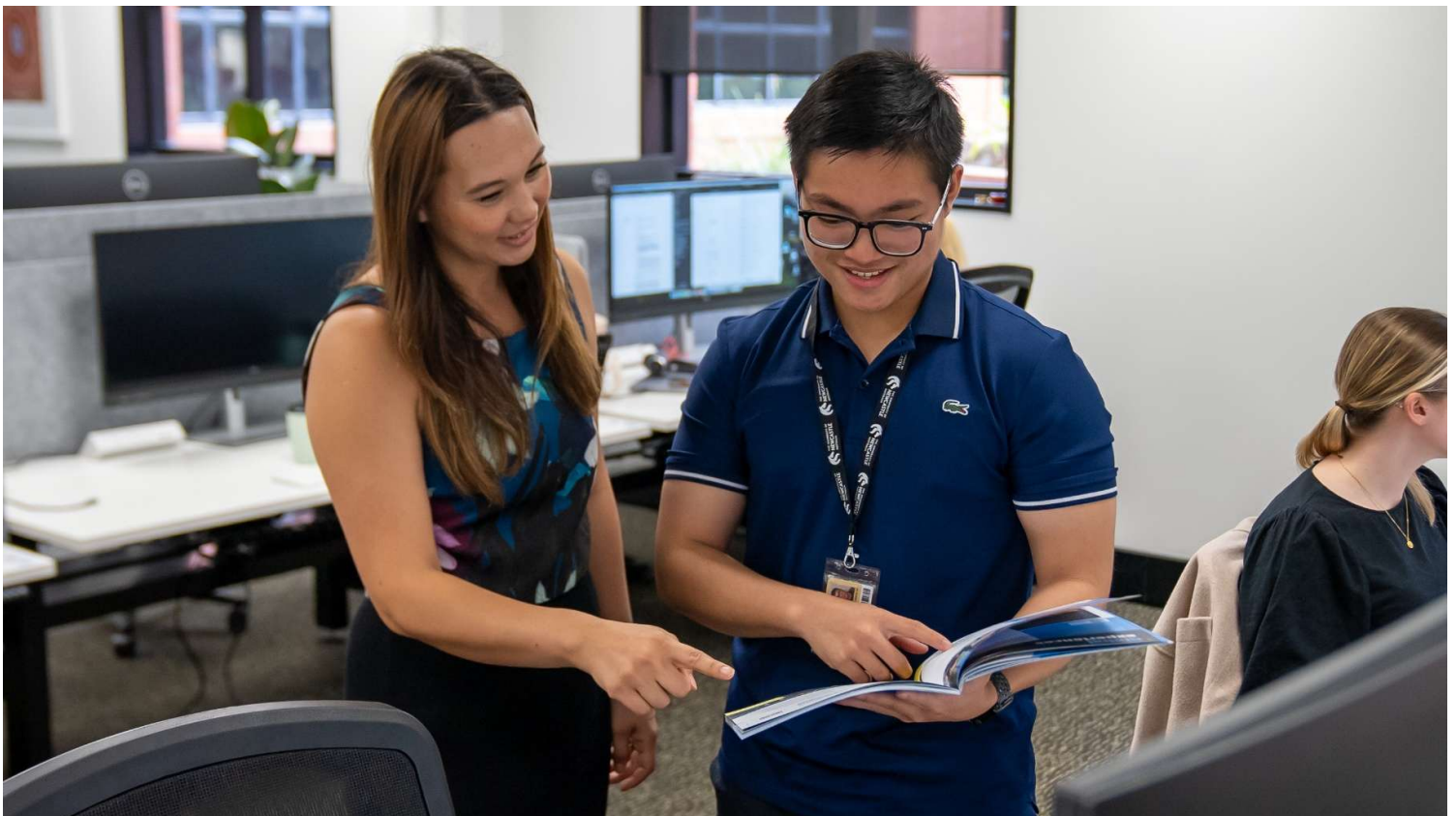
The University set its current three-year ESG goals in 2023 and is monitoring progress toward achieving them. We continue to collaborate with MIAL to find new ways to strengthen our responsible investment strategies.

ASSESSING EFFECTIVENESS

What we are doing to check whether our actions to address modern slavery risk are working:

- Our Anti-Slavery Working Group regularly reviews actions taken and risk areas to be prioritised
- We are cross-referencing prioritised risk areas against risks and controls outlined in operational risk profiles created by University teams
- We undertake information sharing and benchmarking against other AUPN member universities
- Our Risk Team are guiding the Working Group's approach to enhance risk assessment practice and documentation
- We engage with suppliers for heightened risk procurements
- We have proactive engagement with the Complaints Team to identify reports or grievances that may amount to modern slavery instances or allegations

Number of formal complaints received in 2025 alleging or indicating modern slavery practice: Zero



GRIEVANCE MECHANISMS AND REMEDIATION

GRIEVANCE

The University has a strong grievance framework which can be utilised for the reporting of any suspected instances of modern slavery practice, or any breaches of related laws, policies or procedures. The framework includes:

- Complaint Management Policy and Complaint Management Procedure
- Public Interest Disclosures Policy as per Public Interest Disclosures Act 2022
- Compliance Management Policy including a breach reporting function through Legal and Compliance
- Comprehensive range of support services for students

REMEDATION

The University is committed to providing remediation in an open and transparent manner to ensure that appropriate action has been taken to prevent future occurrences.

The University will provide for, or cooperate in, remediation where the University has caused or contributed to an adverse impact.

Where we did not cause or contribute to the harm, but are directly linked to modern slavery, we will use our leverage to work with the entity that caused the harm or consider ending the business relationship. Our grievance processes (Complaint Management Procedures, Public Interest Disclosures Policy and others) and Supplier Code of Conduct are promoted widely in our internal and external communications.

Remedying or counteracting negative human rights impacts may include apologies, termination of relationship or contract, or efforts to ensure non-repetition and similar future occurrences.

Our actions will depend on factors such as:

- leverage over the entity concerned;
- how crucial the relationship is;
- severity of the impact (victim focused);
- the risk appetite of the University; and/or
- whether termination of the relationship will potentially create adverse human rights impacts.

LOOKING AHEAD

Improving our response to modern slavery will involve:

- conducting deeper supply chain analysis through supplier risk tools provided by the AUPN (ArcBlue software)
- further promoting and socialising our Modern Slavery Policy
- ongoing monitoring of training completion rates for staff, students and interested community members
- continued sector benchmarking and collaboration with other universities
- thorough consideration of the NSW Anti-Slavery Commissioner's Guide on Reasonable Steps
- further scoping of high-risk products and industries making sure all the right people are involved promoting grievance mechanisms
- working with suppliers
- engaging with senior leadership and our controlled entities
- continued uplift in supplier and contract management

New things we will do in 2026

The University of Newcastle recognises the critical importance of proactively identifying, assessing and managing modern slavery risks within our supply chain, particularly during periods of heightened vulnerability such as war and conflict. In line with our continued uplift in supplier and contract management, the University is strengthening its due diligence processes to include deeper assessment of third and fourth party relationships, ensuring that our procurement activities and supplier engagements do not contribute to any form of human exploitation. We expect the uplift in supplier and contract management to be in place by the end of 2026.

In addition to the due diligence conducted during sourcing, the University will implement continuous adverse news monitoring across our supplier base. This capability provides real time visibility of modern slavery indicators linked to suppliers, high risk regions and broader supply chain networks. Where credible adverse news suggests an elevated modern slavery risk, the University will take clear and accountable action, including further investigation, escalation to governance bodies, engagement with the supplier, or other appropriate remediation steps. All required responses and accountable actions will be formally documented within the University's new Governance Framework, to be published and endorsed by September 2026, to ensure transparency, consistency and oversight at all levels of the University.

The University believes that continuous monitoring enhances our governance framework by enabling early detection of risk, supporting the protection of vulnerable populations, strengthening compliance with legislative and ethical obligations, and facilitating timely escalation within procurement and supplier management processes. Through these measures, the University reaffirms its commitment to responsible sourcing and to reducing the risk of modern slavery across all areas of our operations.

CONTACT US

This statement has been endorsed by the University of Newcastle's Council.

We value all feedback.

Please forward any comments on this statement or requests for additional information to strategicprocurement@newcastle.edu.au

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