

Modern Slavery Statement **2023**



Message from the Vice-Chancellor and President

As a teaching and research institution with a mission that involves delivering for the public good, The University of Queensland (UQ) is deeply committed to playing our role in the elimination of modern slavery.

In this, our fourth annual Modern Slavery Statement, we are reiterating the 3 key undertakings we made when we released our first Modern Slavery Statement in 2021. In effect, this involves a commitment to eradicating all forms of modern slavery and human trafficking through our operations and supply chains, through adopting a risk management program that is focused on:

1. investing in the organisational policy and cultural frameworks required to prevent, mitigate and, where appropriate, remedy modern slavery in our operations and supply chains
2. developing and implementing the due diligence processes to identify, prevent and mitigate the risk of modern slavery occurring in our operations and supply chains
3. developing and implementing procedures to enable the remediation of any adverse modern slavery impacts that UQ causes or contributes to.

In 2023, we made important progress across all 3 areas, as we continued to develop and implement our organisational frameworks for tackling modern slavery risks within our directly controlled operations as well as our wider supply chains.

Awareness-raising within our community is the most effective tool that we have in terms of identifying, preventing and mitigating the risk of modern slavery occurring at UQ. To that end, this year, we launched a new online training module for staff and students that gives an overview of the nature of modern slavery and its indicators. More than 400 staff completed the training in 2023, with most working in roles that have direct responsibility for procurement decisions or a level of engagement with external entities.

This year, we undertook a detailed assessment of our procurement practices in order to gain a more holistic view of UQ's categories of expenditure and where our suppliers are located throughout the world. This exercise has helped us to better understand areas of potential risk and the industries and jurisdictions that will require ongoing focus.



I am pleased to say that we also expanded membership of the UQ Anti-slavery Working Group this year to include representatives of our controlled entities (from UniQuest, JKTech, and UQ Health Care). Along with a refresh of the Working Group's Charter and terms of reference, the broader membership composition of members is designed to ensure an elevated governance focus on modern slavery risks across UQ's entire operations.

Once again, I would like to acknowledge the efforts of the many UQ staff who have been so proactive throughout 2023 in implementing the University's frameworks and organisational change initiatives in this very important area.

It is thanks to their efforts that we can be confident that we are remaining true to our mission of delivering for the public good, while also enriching the communities in which we're embedded.

Professor Deborah Terry AC
Vice-Chancellor and President



CONTENTS

Message from the Vice-Chancellor and President

The University of Queensland	2
UQ's response to modern slavery: at a glance	3
UQ's structure, operations and supply chain	4
Governance and structure	4
UQ's operations	6
UQ's supply chain	8
Risks of modern slavery in UQ's operations and supply chains	11
Risks in operations	12
Risks in supply chain	14
Actions taken to assess and address the risks of modern slavery	16
2023 Highlights	17
Mapping against our Action plan	26
UQ controlled entities	28
Overview of UQ controlled entities	28
Key insights on modern slavery risks and controls	29
Assessing our effectiveness	31
Consultation	34
Summary	34
Approval	34



UQ acknowledges the Traditional Owners and their custodianship of the lands on which UQ is situated.
— Reconciliation at UQ

The University of Queensland

Founded in 1910, UQ is a body corporate governed by the *University of Queensland Act 1998*, as amended.

UQ is one of Australia's leading research and teaching institutions. We strive for excellence through the creation, preservation, transfer and application of knowledge. For more than a century, we have educated and worked with outstanding people to deliver knowledge leadership for a better world.

Beyond the direct impact of our education and research programs, UQ is committed to enriching communities – both locally and globally – by spreading understanding, raising awareness, disseminating culture, building capacity, creating opportunities, and connecting people.

UQ is a signatory to the United Nations Sustainable Development Goals, which laid the foundation for our **UQ Sustainability Strategy**, both of which formalise the University's commitment to solving global sustainability challenges – at a local, national and international level. The UN Sustainable Development Goals seek long-lasting sustainability outcomes through an integrated approach across environmental, social and economic concerns.

UQ is one of only 3 Australian members of the global **Universitas 21**, a founding member of the **Group of Eight (Go8)** universities, and a member of **Universities Australia**.

Industry recognition and awards

UQ maintained its position as one of the world's top 50 universities in most global ranking surveys this year and we were ranked as the nation's leading university in the *Australian Financial Review's* inaugural Best Universities Ranking. We jumped 7 places to be ranked 43 in the world in the **QS World University Rankings for 2024** and ranked 51 in the **Academic Ranking of World Universities (ARWU) 2023**, maintaining second position in Australia. Our achievement in these important global rankings is testament to the impact of our teaching, research and innovation across a range of fields, to help solve some of the most pressing challenges facing the world, and our commitment to excellence.

We continued to build on our proud track record of leading the nation in teaching awards, with Dr Poh Wah Hillock from UQ's School of Mathematics and Physics named Australian University Teacher of the Year at the Australian Awards for University Teaching and Dr Miriam Moeller from the UQ Business School receiving an international Universitas 21 teaching award. As well, 2 UQ students, Jeremy Hunt and Emerald Gaydon, were selected as recipients of the prestigious Rhodes Scholarship, and Professor Glenn King from UQ's Institute for Molecular Bioscience received the 2023 Prime Minister's Prize for Innovation for his pioneering work in using peptides from funnel-web venom to develop more sustainable insecticides and potential therapeutics.

The UQ-led Zero Net Emissions Agriculture Cooperative Research Centre (CRC) was awarded an \$87 million Australian Government grant – the largest ever financial contribution made to a CRC – to help support the transition of the Australian agriculture sector to zero net emissions, while also improving its competitiveness, productivity and sustainability.

For the third year in a row, UQ was recognised among the top 10 universities in the world in the Wellbeing and Work category of the international Sustainable Campus Index. Compiled annually by the **Association for the Advancement of Sustainability in Higher Education (AASHE)**, the index uses data from more than 900 tertiary institutions around the world that participate in the Sustainability Tracking, Assessment and Rating System (STARS). Top performers are recognised across a range of environmental, economic and social sustainability impact areas.

The **UQ website** provides more detailed information about our business, including our strategy and operations, as well as our approach to sustainability.

UQ's response to modern slavery: at a glance

This Modern Slavery Statement (**Statement**) is published on behalf of The University of Queensland (**UQ**)¹ and is UQ's fourth under the *Modern Slavery Act 2018 (Cth)*. This Statement includes UQ's controlled entities and is prepared as a single reporting entity.

This Statement is an opportunity to reflect on the initiatives and measures undertaken by UQ and its controlled entities to identify, mitigate and manage the risks of modern slavery in our operations and supply chains during the financial year ending 31 December 2023 (**reporting period**), and to highlight our commitment for the years ahead.

UQ's purpose is to deliver for the public good through excellence in education, research and engagement with our communities and partners – both locally and globally (**UQ Strategic Plan 2022-2025**). The Strategic Plan describes how we will continue to fulfil that purpose, as we seek to seize new opportunities and meet the challenges of the future.

At UQ, we are committed to acting ethically and with integrity in all our relationships, and to employing all reasonable efforts to prevent slavery and human trafficking within our operations, supply chain and wider sphere of influence. It is important for us to treat people with care, dignity and respect – within our institution and the communities where we operate, including our supply chains.

We recognise that modern slavery is a significant global human rights issue that is both complex and challenging and are committed to playing our role in combating it. The recently released **2023 Global Slavery Index** sheds light on the worsening global slavery crisis, revealing alarming statistics and highlighting the need for immediate action.

Since our inaugural Modern Slavery Statement for the year 2020, we have continuously improved our approach to identifying and responding to the risks of modern slavery. We remain focused on taking meaningful steps to strengthen and advance this approach, as well as guiding and assisting our partners and suppliers to do the same. We welcome feedback on this Statement and constructive discussions with stakeholders on our approach as our modern slavery response continues to evolve.

Our 2023 Statement focuses on 4 key themes: raising awareness of these risks, integrating modern slavery risk management across our business activities, strengthening our partnerships with suppliers and other key stakeholders to combat modern slavery, and increasing transparency about the challenges and the lessons we have learned.

How this Statement addresses the mandatory criteria outlined in the *Modern Slavery Act 2018 (Cth)* can be found on page 34.

¹ Unless specified otherwise, references in this Statement to 'the University', 'our', 'us' and 'we' refer to The University of Queensland.

UQ's structure, operations and supply chain

Governance and structure

The University of Queensland is **governed** by a 22-member Senate representing University and community interests, led by an elected Chancellor.

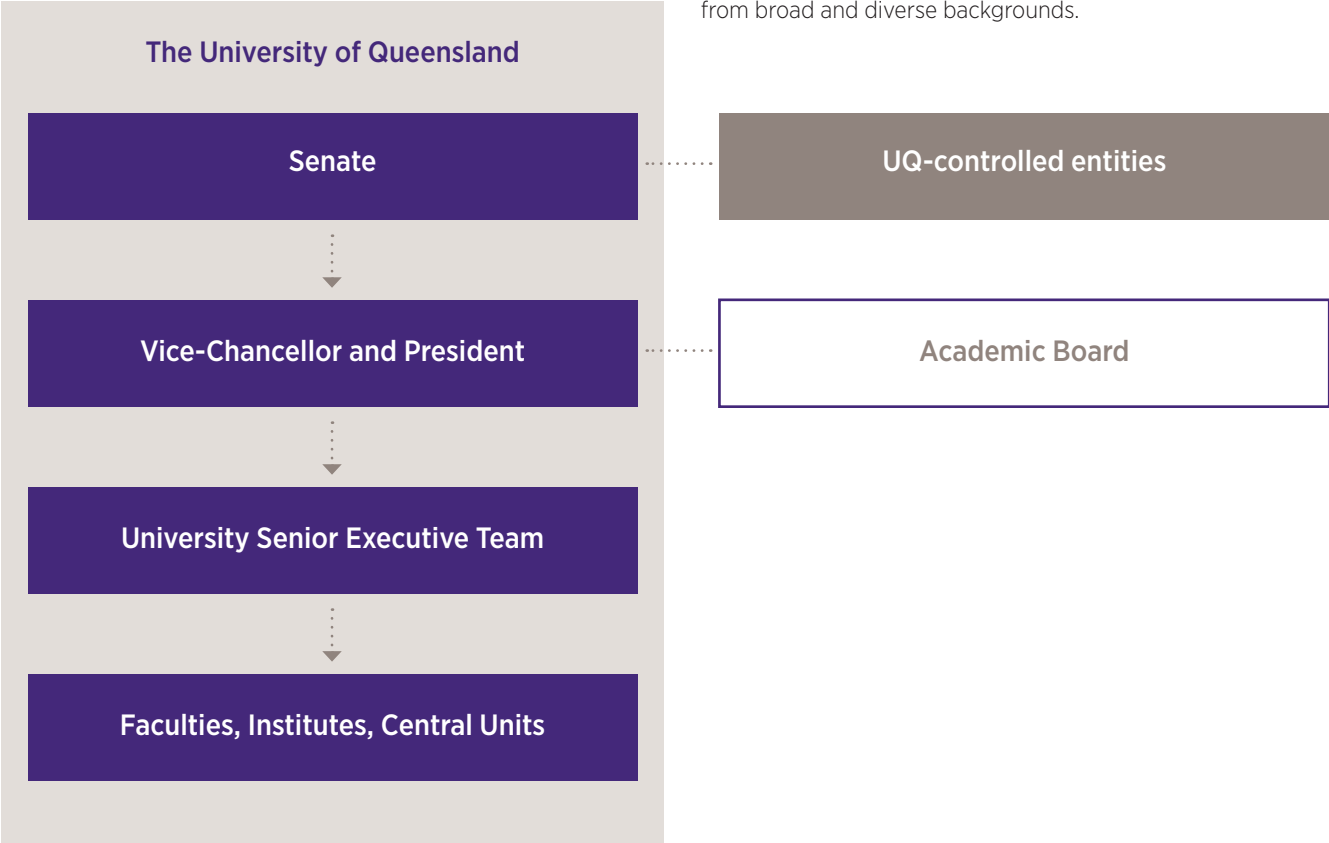
The *University of Queensland Act 1998* grants the Senate wide powers to appoint staff, manage and control University affairs and property, and manage and control finances to promote the University's interests. The University complies with the *Voluntary Code of Best Practice for the Governance of Australian Public Universities*.

The **UQ Governance and Management Framework** (Governance Framework), underpinned by a range of policies, procedures and guidelines, provides the overall structure and direction for the systematic and disciplined governance and management of UQ. Committees of the University support decision-making for matters associated with the University's key functions.

The University's organisational structure comprises 6 faculties, more than 30 schools, 8 globally recognised research institutes, more than 100 centres, and several key divisions.

We offer study, research and partnership opportunities in Australia and globally. Our research institutes are home to centres and research groups made up of scientists, social scientists and engineers who champion research excellence and continue UQ's tradition of research leadership.

Implicit in our vision, 'knowledge leadership for a better world', UQ seeks to have global impact. In collaboration with a range of international partners, we offer our students a global educational experience, undertake development initiatives and research that have international impact, and deliver a UQ education to learners from broad and diverse backgrounds.



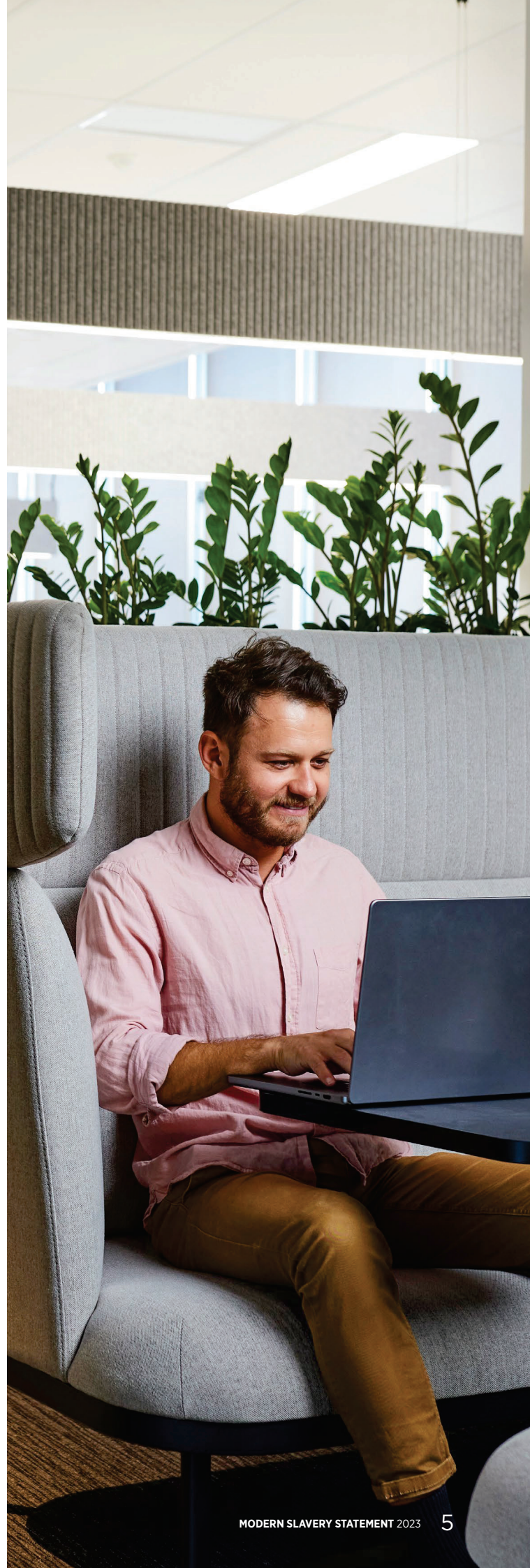
In accordance with the *University of Queensland Act 1998*, the University has established controlled entities that further the University's educational and research aims.

UQ's main campuses are located at St Lucia, Gatton and Herston. Details of UQ's teaching, research and other facilities in Brisbane and Queensland can be found on the **UQ webpage**. In November, we announced that the UQ School of Pharmacy site at Woolloongabba was set to become the University's fourth campus from 2024, UQ Dutton Park – reinforcing UQ's role as key partner in the development of the nearby Boggo Road Innovation Precinct.

UQ has a total student base of 55,441 (2023)² including 21,566 international students from across the globe with top 3 international source countries being China, India and Hong Kong.

UQ's full-time equivalent staff (including projected numbers for casual staff) in March 2023 equated to 7,504 (2,989 academic staff and 4,515 professional staff).

² Figures for 2023 are provisional and will be finalised in mid-2024.



UQ's operations

In 2023, the University successfully pursued its mission of delivering for the public good through excellence in education, research, and community engagement.

During the reporting period, the commercial potential of UQ's research was recognised by the Government's Australian Economic Accelerator (AEA) scheme. Technology-ready grants were awarded to 4 UQ projects aligned with the Australian Government's National Reconstruction Fund priorities, in renewables and low-emissions technology and medical science. These 4 awards epitomise the systematic approach UQ undertakes to ensure that the highest quality research generates new knowledge and can be translated, in partnership with industry, for new sources of growth and opportunity.

As another recognition of UQ's sustainability initiatives, Associate Professor Carissa Klein, a UQ scientist working to improve sustainability in the fishing and seafood industries, was named the 2023 Queensland Young Tall Poppy of the Year.

Separately, a UQ project is using technology to create a native food value chain to ensure Indigenous communities and businesses benefit from the thriving bushfood industry. This project will create equity, provenance and protection for our communities and businesses that harvest native bushfoods.

We seek to enrich communities here in Queensland, and around the world. Our commitments to leading reconciliation, global development and capacity building; broadening access to education; and leveraging our research impact to strengthen the economy demonstrate just some of the ways in which we will deliver for the public good.

Through our **Queensland Commitment**, we are broadening access to higher education, and working in partnership to address our state's priorities, including those relating to the health workforce and economic diversification. As part of *The Queensland Commitment*, we work collaboratively with communities, partners and government across the state to overcome the personal, financial or geographic barriers that might deter those from a regional, remote or low socio-economic background from studying at UQ. For us, *The Queensland Commitment* is much more than a philanthropic campaign. It is a comprehensive initiative to support Queensland's future by increasing access to education, engagement and partnership.

We're also blazing the trail for Australian food and beverage manufacturing. Our **Food and Beverage Accelerator (FaBA)** unites the brightest university minds with industry experts, leveraging Australia's natural advantages to accelerate growth across the sector and deliver the innovation, ingredients, tastes and foods that people need. By providing pathways for new products, technologies and opportunities for industry and researchers, FaBA is leading the way for smart, sustainable food and beverage manufacturing in Australia.

At UQ, we aim to provide an experiential curriculum with local and global partners that inspires students and extends their capabilities to thrive in a global environment. In 2023, we offered 348 programs, 3,602 courses and 24 shorter form credentials, some of which included global experiences. We enrolled 55,441 students across all our programs. We are developing opportunities that give students an edge in local and global networks through experiences that foster leadership, entrepreneurship, civic duty and digital literacy, among other critical capabilities.

The University recorded a consolidated surplus of \$126.0 million for 2023. This compares to a consolidated deficit of \$310.8 million in 2022. The total operating revenue for 2023 was \$2,467,913,000.

In 2023, UQ's operating revenue was

\$2.47 billion

Investments

For the year ended 31 December 2023, the University maintained a long-term managed investment portfolio, the UQ Investment Fund, which serves 2 purposes.

First, it holds the endowments received by the University. These endowments are invested in perpetuity and the earnings are used to support a particular purpose (e.g. scholarships, prizes, chairs) consistent with the donor's intent.

Second, it holds a portion of annual operating surpluses generated by the University. This is known as the UQ Future Fund and the funds are invested in the long-term to provide for (1) a stream of investment earnings that can be used to fund innovative or strategically important teaching and learning activities, and/or (2) a reserve to draw upon to absorb a large financial shock.

UQ Investment Fund

The UQ Investment Fund is managed by external fund managers who are required to operate within designated asset allocation benchmarks. Each has responsibilities for investments in cash and fixed interest, listed property, Australian shares, international shares, and private equity. The balance at 31 December 2023 was \$1,023.4 million. Of this total, \$432.5 million relates to endowments and \$590.9 million relates to the UQ Future Fund.

The performance target of the UQ Investment Fund is to achieve a long-term return (net of all fund manager fees) of the Consumer Price Index plus an additional 5.0% over rolling 7-year periods. As at 31 December 2023, the fund had produced a one-year return of 26.52% and a 7-year return of 10.56% per annum (exceeding the target by 2.47% per annum).

The UQ Investment Fund has no direct investments in fossil fuel companies. The University regularly monitors the composition of investments managed by external fund managers and ensures fossil fuel companies do not form a material part of the total investment.

Human rights issues may sometimes intersect with investment decisions. Investments can present modern slavery risks in the same way as supply chain risks, which are dependent on the investee business sector, geographical location, business model or workforce profile.

We recognise that investing responsibly drives value and we look to incorporate due diligence in our investment decisions so that we can demonstrate the values alignment that is vital for building and maintaining public trust.

UQ's Investment Policy provides the framework within which investment opportunities are assessed, appropriate investment strategies adopted, and investment performance optimised. It also enables due diligence and informed decision-making on investments; and provides assurance to the UQ Senate and management that investments are managed appropriately, and investment objectives and returns are being achieved.

During the reporting period, we undertook a desktop analysis of the environmental, social and corporate governance (ESG) profile of our fund managers, the results of which were comforting. Highlights from this analysis include:

- Majority of our fund managers have issued a Modern Slavery Statement³ describing the actions they take with respect to identification and management of modern slavery risks.
- Majority of our fund managers are signatories to the **United Nations Principles for Responsible Investment (PRI)** and are also members of **Responsible Investment Association Australasia (RIAA)**.
- No adverse media statements for our fund managers in relation to modern slavery were identified.

Partnerships

UQ partners with businesses to create mutually beneficial change. By partnering with UQ, businesses can gain privileged access to cutting-edge ideas, knowledge, state-of-the-art equipment and facilities, and talent. At the same time, UQ's researchers and students benefit from being involved in the complex challenges facing industry.

UQ is also committed to working collaboratively with international partners to increase global connectedness and create positive, lasting change in the communities where we engage. UQ's impact can be felt all over the globe. See our **Global Partnerships** and **Industry Partnerships** websites to learn more.

UQ and Paralympics Australia have partnered to make Brisbane a hub for Paralympic sport in the lead-up to 2032. This partnership provides a unique opportunity for 2 world-leading organisations to build capability and enhance Paralympic sport equity.

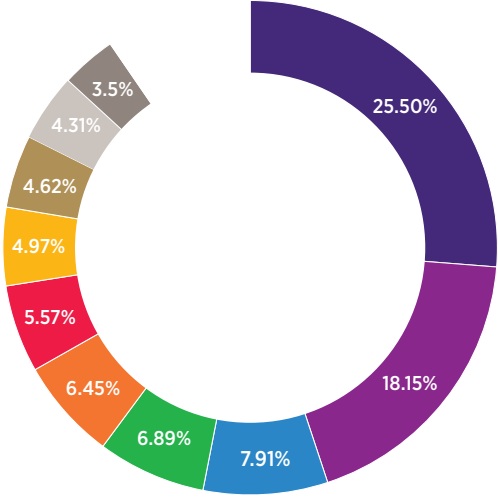
³ Either directly or through a partner entity

UQ's supply chain

UQ's suppliers are integral partners in achieving our vision of knowledge leadership for a better world.

During 2023, our spend on goods and services was \$645.8 million.⁴

The precise form of our supplier relationships varies according to the nature, term and value of each engagement.



Top 10 known source countries

Our supplier footprint for 2023 comprised over 30,000 direct suppliers from 98 countries, with 98.23% of our total spend being in the top 10 countries below.

Categories of spend

We procure a diverse range of goods and services across our operations and projects.

Our top 10 categories of spend⁵ during 2023 are included in table at right, with over 87% of our spend being in these categories.

Category of spend	Spend value (AUD)	Percent of total spend
Construction, refurbishment and works	\$164,677,698	25.50%
Corporate professional services	\$117,205,052	18.15%
Laboratories and research	\$51,077,920	7.91%
Plant and equipment	\$44,484,376	6.89%
IT software	\$41,678,303	6.45%
Buildings and grounds	\$35,989,377	5.57%
Human resources	\$32,117,307	4.97%
Travel and entertainment	\$29,861,828	4.62%
Utilities and renewables	\$27,844,573	4.31%
IT professional services	\$22,581,617	3.50%



Country of spend	% of total	% of total spend
1 Australia	\$594,214,939	92.01%
2 United States	\$20,899,535	3.24%
3 United Kingdom	\$4,446,856	0.69%
4 The Netherlands	\$3,807,719	0.59%
5 Ireland	\$2,215,728	0.34%
6 Germany	\$2,063,398	0.32%
7 China	\$1,989,946	0.31%
8 Canada	\$1,899,776	0.29%
9 Singapore	\$1,447,553	0.22%
10 India	\$1,395,800	0.22%

⁴ Total spend of \$645.8 million includes procurement spend across all payment methods, including UQ Corporate credit card.
⁵ For top 10 categories of spending, Australasian University Procurement Network category taxonomy applies.

In 2023, UQ's procurement spend was



\$645.8 million



30,000+
suppliers



98
countries

Procurement operating model

UQ has a centre-led, category-managed, and business-enabled procurement operating model. Procurement decisions are taken by the organisational units within the boundaries set by UQ's Procurement Framework. Our specialist procurement teams work to address the needs of UQ business units.

During the reporting period, we undertook a review of the operation and effectiveness of our procurement function. This included benchmarking against best practice and reviewing UQ's procurement governance and capability framework, including current thresholds, approach to policy exemptions, addressable spend definition, sourcing requirements and resourcing structures.

This was followed by introduction of our digital 'source to contract' platform, UQProcure, and a refresh of our Procurement **Policy** and **Procedure**. Operation of the procurement function under the refreshed procurement framework and digitisation is delivering benefits in governance, value for money and process efficiencies.

Under the renewed framework, all procurement activities for \$200,000 and over are supported by procurement specialists. This gives us an opportunity to better ensure that any individual procurement strategy reflects the outcome of modern slavery risk assessment and identifies opportunities to address modern slavery risks. Procurement specialists ensure that the decision-makers in UQ's organisational units support and encourage positive change in the conduct of suppliers and market practices to effectively identify, assess and address potential modern slavery risks.

We continue to equip our buying community with tools and resources to identify modern slavery risks connected with the work they perform and the third parties they engage, including suppliers from whom goods and services are purchased. Our consistent messaging to our buying community is to stop and think before they buy and acknowledge that procuring is not simply a monetary decision.

Socially responsible procurement

UQ promotes a 'Buy with impact' approach that reflects UQ's commitment to ethical responsibility, environmental sustainability and diversity in our supply chain.

We encourage our buying community to consider how their purchases can generate social value beyond the value of the goods and services being procured through the selection of social, diverse or ethically responsible suppliers. UQ's **Procurement Policy** includes requirements for all procurement and purchasing activities to be undertaken in an economically, socially, environmentally and ethically responsible way.

During the reporting period, we released a **webpage** for staff addressing aspects of socially responsible procurement including a range of tools and resources on how staff can embed socially responsible considerations in the procurement activities they undertake.



UQ employs a wide range of staff in many roles for diverse audiences, using thousands of suppliers.

Local buying

We encourage local buying, which empowers our buying community to make ethical purchasing decisions, promotes transparency in supply chains, and fosters local economic development – all of which contribute to addressing modern slavery risks.

We apply the local benefits test to significant procurement activities, defined as procurement valued at \$1 million or more, allowing UQ to consider broader strategic factors such as stimulating local employment, increasing local socio-economic development, and supporting social objectives when making procurement decisions.

We also encourage spend with Australian suppliers through our UQeMarket portal, which is an electronic marketplace of identified Australian supplier catalogues.

By supporting local businesses, we can contribute to the creation of sustainable livelihoods within the communities we operate in. This can help alleviate economic vulnerabilities that can make individuals more susceptible to modern slavery. Local buying also improves visibility of our supply chain and helps reduce the complexity and opacity that can enable modern slavery to thrive.

Indigenous procurement

UQ's *Indigenous Procurement Strategy 2022-2025* was released in 2022 to expand UQ's engagement and procurement spend with Indigenous businesses and formalise UQ's commitments to supplier diversity as detailed in **UQ's Reconciliation Action Plan**.

During 2023, we worked to better understand purchasing behaviours across the University and promote the Strategy to our buying community. Barriers to purchasing from Indigenous businesses were also identified, particularly with cost or budget considerations and payment processes. We put in place communication and buyer awareness programs to help reduce those barriers.

Risks of modern slavery in UQ's operations and supply chain

Global estimates of modern slavery are concerning. The global pandemic, changing political climate, economic uncertainty and international conflict are all heightening the vulnerabilities of people living in poverty, migrants, refugees, women and children.

Understanding modern slavery risks is critical as it enables us to focus our efforts, prevent exploitation, foster collaboration, allocate resources effectively, and monitor our progress. This knowledge is essential for targeted and impactful actions and partnerships in the fight against modern slavery.

We assess modern slavery risks in our operations and supply chains using the Risk Model⁶ below in conjunction with research, external reports and standards, country and sector risk profiles,

previous assessments, and input from our peers and experts in this area. These risk factors are considered in the context of our broad categories of workers (employees, students, volunteers, contractors and supply chain workers).

Our modern slavery risk profile is not static. It changes over time as we embark on new areas of business, form new partnerships, or source our needs from different suppliers, countries or regions. External factors and events may also influence our risk profile.














⁶ Adapted from *Addressing Modern Slavery: A Guide for Australian Businesses*; Australian Red Cross

Risks in operations

UQ is committed to a strategic and structured approach to university-wide risk management. Our approach supports the regular identification, management and reporting of risks and is aligned to our **Senate Risk Appetite Statement**.

UQ's **Enterprise Risk Management Framework** allocates responsibility across all levels of the organisation for identifying and managing risks, including modern slavery risks. This allocation of responsibility, combined with the procedures and processes we have in place and the actions we take as part of our modern slavery program, assures us in our controls against the risk of modern slavery practices occurring in our

operations. We remain aware that given the geographical spread of our operations, we must be alert to the possibility of modern slavery occurring. It is important that we continuously review and improve our controls against modern slavery risks, adapting to changing circumstances and emerging best practices in the field.

2020 	2021 	2022 	2023 
<p> High-level discovery work, including questionnaires and follow-up interviews with organisational units and controlled entities, to understand and assess at a high level where and how UQ's operations may be exposed to modern slavery risks, and to identify existing controls that are in place to manage these</p>	<p> Detailed risk assessments with organisational units and controlled entities to understand and assess modern slavery risks, existing controls and proposed additional controls</p>	<p> Identified UQ's organisational units that have activities or operations in 15 high-risk jurisdictions for modern slavery risks</p> <p> Developed a Modern Slavery Risk Assessment Tool to use as a pilot within the organisational units identified above</p>	<p> Promoted use of UQ's Modern Slavery Risk Assessment tool across operational activities</p> <p> Engaged to enhance due diligence process for UQ's student recruitment agents</p> <p> Improved our engagement with students on modern slavery issues</p>

Employees

Modern slavery risks for our employees are mitigated by several factors:

- The majority of UQ employees are employed directly on a permanent, fixed-term or casual basis through standard contracts of employment, administered centrally by UQ's Human Resources Team.
- UQ's recruitment procedures comply with relevant local regulations and standards as well as relevant legislation.
- UQ adopts an equitable approach when scouting for talent and all wages are compliant with local laws and regulations.
- UQ supports its staff's mental and physical wellbeing through a variety of initiatives, including training programs, wellbeing workshops and the provision of an employee assistance program.
- UQ offers a supportive and flexible workplace for those balancing families and other responsibilities with their careers, and strives to ensure our work environment is safe, family-friendly, environmentally friendly and culturally sensitive, with equal opportunity for all.
- UQ provides training and awareness programs to staff to educate them about their rights, the signs of modern slavery, and how to report any concerns or suspicions.
- UQ encourages a culture of reporting and provides mechanisms for anonymous reporting.

Students

Modern slavery can be a risk for university students when they engage in paid employment, voluntary work and learning experiences, though the extent of this risk will vary depending on factors such as location, industry and individual circumstances. In particular, international students may face increased risks due to their potential unfamiliarity with local laws, language barriers, and limited support networks. They may be targeted by unscrupulous employers wanting to exploit their vulnerable position, offering substandard working conditions or engaging in human trafficking.

Certain industries that employ university students, such as hospitality, agriculture, retail and service or manufacturing, have been associated with labour exploitation and modern slavery practices. Students who work part-time or take internships in these sectors may unknowingly find themselves in situations of exploitation.

The following controls are in place to curtail these risks:

- our robust student placement framework
- screening of prospective student work-integrated learning partners to assess their legitimacy and appropriateness
- contracts with our work-integrated learning partners and third-party providers that highlight their responsibility for student welfare, including the provision of a safe and secure working environment
- strong regulatory frameworks where learning opportunities are within Australia
- awareness-raising with students and our student-facing teams.

During the reporting period, we continued to strengthen our controls in this space. This work is described on page 18–19.

Workers of partners engaged as part of UQ's teaching, research, consultancy and commercial activities

There is potential for modern slavery risks to arise because of UQ's research activities, and government and industry partnerships both in Australia and overseas.

Modern slavery risks related to partnerships could arise where a partner demonstrates poor governance and transparency or has reported connections to human rights violations. Separately, where research is conducted in countries at high risk for modern slavery, there could be a risk of using vulnerable stakeholders with weak governance and uninformed consent as research or clinical trial participants.

Modern slavery risks with workers of UQ's partners are assessed as low due to:

- UQ's strong policy framework, which includes partner due diligence
- contractual controls
- oversight of engagements by UQ's central support functions.

Volunteers

Modern slavery risks for volunteers can vary depending on the context and nature of their volunteer work. While volunteering is generally seen as a positive and altruistic activity, volunteer programs that do not have proper safeguards and protection mechanisms in place may expose volunteers to various risks. This can occur in volunteer programs that do not prioritise the wellbeing and rights of volunteers or situations where volunteer recruitment is unregulated.

At UQ, the Chief Human Resources Officer is the policy owner of the **Volunteers Policy and Procedure**. While the Human Resources team is accountable for volunteers (risks and key controls), the responsibility for managing volunteers lies with the organisational areas that manage volunteer engagement in the projects and initiatives they lead.

Modern slavery risks with UQ's volunteers are assessed as low due to UQ's policy framework, which is designed to ensure that volunteers are engaged on a truly voluntary and non-exploitative basis.

A thorough review of UQ's Volunteers Policy and Procedure has been flagged as an action item on the schedule of policy and procedure reviews to improve the compliance oversight of volunteers. This review and related training program for managers will be progressed during 2024.

Risks in supply chain

The complexity and breadth of our supply chains mean we must be vigilant in mitigating any exposure to modern slavery risks. We focus on identifying and understanding these potential risks and the ways that our actions and other factors may shape our risk profile.

Our suppliers are key partners in our modern slavery response. We are committed to building trusted long-term relationships with our key suppliers to maximise opportunities for companies and communities to thrive, all while promoting safe working environments. We aim to work closely with key suppliers to understand and enhance their own modern slavery risk management processes.

Category risk⁷



● Very high risk ● High risk ● Medium risk ● Low risk

⁷ Australasian University Procurement Network (AUPN) category taxonomy, depicting risk rating based on desktop research and literature review of published reports and data sets related to the specific goods and services procured, as well as AUPN category risk allocations.

Limitations of our approach

Addressing modern slavery risks in the supply chain can present several challenges that require a multi-faceted approach, including due diligence, supplier engagement, capacity building, and collaboration with relevant stakeholders.

- Modern slavery risks can occur at any level of the supply chain but may be more likely to occur below Tier 1. A Tier 1 supplier is one who has a direct contractual relationship with the University. Modern slavery in the supply chain below Tier 1 can be difficult to identify and address due to lower visibility and transparency, no direct contractual relationship and generally lower ability to influence. Contractual terms and close partnerships with Tier 1 suppliers offer some comfort. At this time, we have been unable to perform an analysis of modern slavery risks beyond our Tier 1 suppliers. The supplier risk portal provided through the Australasian University Procurement Network combined with improved data analytics (page 20) will help us progress this work.
- Some suppliers may be reluctant to disclose information about their labour practices or may provide incomplete or inaccurate data. This lack of cooperation can impede effective risk assessment and mitigation.
- Modern slavery risks can vary across different countries and regions. Understanding local laws, cultural norms and labour practices in each location can be challenging.
- Conducting comprehensive risk assessments and implementing mitigation strategies require dedicated resources, including financial, human and technological capabilities. This can be challenging in an already restricted financial climate.

Collaboration with the Australasian University Procurement Network (AUPN)

Recognising the complexity of eradicating modern slavery, we value collaboration and learning together with our peer universities, industry groups and civil society experts. We continued to collaborate with the AUPN during the reporting period.

Ongoing work includes implementing a supplier risk portal, which will assist with determining the modern slavery risk profile of suppliers in our supply chain and provide actionable insights that will inform further due diligence approaches including assessment questionnaires, reporting and further engagement with suppliers.

Country of spend	Modern slavery risk ⁸	% Spend to total procurement spend ⁹
1. Australia	Low	92.01%
2. United States	High	3.24%
3. United Kingdom	Low	0.69%
4. The Netherlands	Low	0.59%
5. Ireland	Low	0.34%
6. Germany	Low	0.32%
7. China	High	0.31%
8. Canada	Low	0.29%
9. Singapore	Low	0.22%
10. India	Very High	0.22%
11. Other	Very High	0.04%
	High	0.32%
	Medium	0.58%
	Low	0.83%
TOTAL		100%

● Very high risk ● High risk ● Medium risk ● Low risk

⁸ Risk factors include operating context and location of work; country of spend data includes data provided by our bank on UQ Corporate credit card usage; risk rating is based on country risk rating outlined in the 2023 Global Slavery Index. A higher level of risk is assigned where the estimated number living in modern slavery is one million or more.

⁹ Suppliers paid using UQ Corporate credit card are allocated to a country based on the currency in which they are paid, which may not necessarily be the country where the supplier is located. 'Other' category includes suppliers based in countries other than the top 10 countries of spend or where the country of spend is unknown.

This consortium approach to modern slavery offers several benefits:

- It allows for collaboration among multiple stakeholders, such as governments, suppliers, businesses and civil society organisations. This collective effort enhances the effectiveness of anti-slavery initiatives by pooling resources, expertise and networks.
- It helps increase our organisational knowledge and learnings. It also helps us develop a pragmatic and ultimately impactful approach to modern slavery risk management in the supply chain.
- It promotes information sharing and coordination. By sharing data, best practices and lessons learned, we can better understand the complexities of modern slavery and develop more targeted and impactful interventions.
- This approach is appreciated by our suppliers as well, as it fosters a unified and coordinated response to modern slavery. By aligning strategies and actions, we can reduce the information-sharing burden on suppliers and maximise the impact of their interventions.

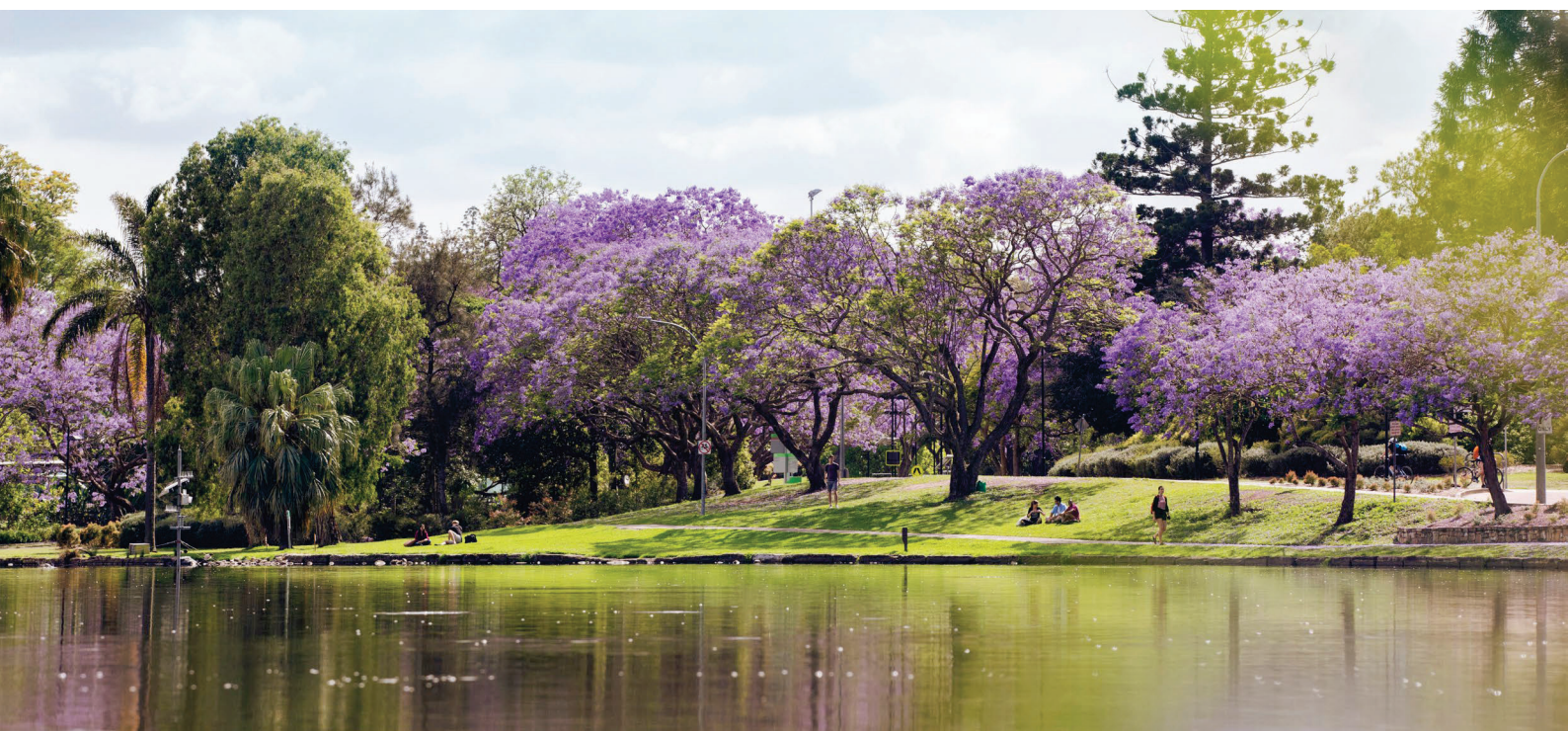
Actions taken to assess and address the risks of modern slavery

Our actions taken in the reporting period focused on assessing and addressing modern slavery risks in our operations and supply chains by:

- refining our existing risk mitigation strategy to identify, assess and address potential modern slavery-related risks in our operations and supply chains through increased collaboration within the University to ensure alignment on approach where possible
- continuing to raise awareness and build capability of our staff and students
- deepening our understanding of our supply chain, and progressing reviews of our suppliers. This includes dialogue with the AUPN about supplier risk platforms available to facilitate consistent data collection across our supply chain
- developing our knowledge and gain insights into current and emerging trends, challenges and best practice on modern slavery risk management and ethical sourcing
- embedding modern slavery due diligence as part of our pre-engagement and onboarding checks before entering relationships with third parties.

See 2023 Highlights section from page 17 for more details.

We continued to monitor progress against our commitments and identified priorities for future years as specific reporting against the broad indicators of our Modern Slavery Action Plan. Mapping of our actions against our action plan and our future commitments to expand the current measures and controls are included on pages 26 and 27.



Renewal of the UQ Lake and Amphitheatre is one example of our construction, refurbishment and works – UQ's top supply chain category by value of spend in 2023.

2023 Highlights

Policy commitment (Governance framework and stakeholder engagement)

Contracts

Contracts can play a crucial role in mitigating modern slavery risks and addressing unethical practices.

During the reporting period, UQ continued to review and strengthen its standard contract templates to support appropriate management of modern slavery risks. Clauses introduced include supplier warranties to conduct business in a manner to reduce the risk of modern slavery in its own operations and supply chains. The clauses also allow UQ to immediately terminate the agreement if the supplier does not strictly comply with its modern slavery obligations.

General clauses were created to be incorporated into other non-standard agreements and **UQ's Purchase Order terms and conditions** were also refreshed during the year.

Policy framework

Our governance structure and policies provide the foundation for our response to modern slavery and broader human rights risks. They help ensure that responsibility for managing modern slavery risks is defined across our business and assists us in taking a consistent and coordinated approach.

Our commitment to uphold fundamental human rights is reflected across our policy framework. As reported in our previous statements, we have a **Staff Code of Conduct** that articulates UQ's values and sets out the standards of conduct that the University expects and requires of all staff and contractors, and the consequences of failing to meet those standards. The university also reviews its policies for compliance with the *Human Rights Act 2019 (Qld)*.

UQ's Financial and Contract Sub-delegations Procedure addresses pre-contract due diligence and outlines several factors that UQ sub-delegates need to consider before entering a contract on behalf of UQ and include consideration of modern slavery risks.

Integrating responsibility for modern slavery risk management into broader governance structures promotes cross-functional collaboration and integrates modern slavery into wider sustainability and related activities. It provides opportunities to share learnings with other parts of the business and facilitates engagement with senior management.

Anti-slavery Working Group

The purpose of UQ's Anti-slavery Working Group (Working Group) is to facilitate UQ's response to modern slavery and comply with the legislative requirements of the *Modern Slavery Act 2018 (Cth)* through leadership and best practice.

The Working Group informs and advises UQ's senior executive leadership team on modern slavery-related issues and UQ's role in managing and mitigating modern slavery risks. Its values reflect UQ's values of creativity, excellence, truth, integrity, courage, respect and inclusivity. The Working Group acts as an advisory body and is accountable to UQ's Chief Financial Officer for its performance.

The current group includes staff representatives from key functions across UQ including procurement, legal services, research, international development, academia, and student enrichment and engagement, as well as representatives of some controlled entities. This cross-functional approach is essential to harnessing knowledge and understanding of our business and operations. It also eases the effort involved in facilitating and coordinating actions to manage key risk areas. Representatives of 3 of our controlled entities joined the group during the reporting period, which was useful in terms of gaining perspective and collaboration.

The **Terms of Reference** for the Working Group were refreshed during the reporting period to align with best practice. The group met 4 times during 2023.

Modern slavery due diligence

Operations – Risk assessment and engagement

Research partner due diligence program

As outlined in the previous year's Statement, UQ embarked on a project to rollout a due diligence screening platform to facilitate smarter, automated and comprehensive due diligence of its research partners. This project will also result in refining our existing due diligence frameworks in addition to enabling a consistent approach to risk management.

This project was expected to be delivered during the reporting period but has been slightly delayed and is on track to be delivered in 2024. Work continues to progress on preparing local standard operating procedures, supporting artefacts, guidance materials and checklists to complement the platform release.

During the reporting period, our research partnership managers continued to undertake manual risk assessments of new research partners, which includes a mix of desktop analysis and insights from third-party reporting tools. In collaboration with our Enterprise Risk team, our research teams are also developing an agreed matrix for partner risk assessment to ensure a consistent approach across the University. Modern slavery risks will be addressed as part of this risk assessment.

We continue to explore avenues to increase awareness of modern slavery risks for our researchers.

Modern Slavery Risk Assessment Tool

UQ operates with a devolved decision-making model and a governance structure where decision-making authority is distributed across various management levels and stakeholders. This model empowers stakeholders by giving them a voice and influence in decisions that affect them. While decision-makers are responsible for the outcomes of their decisions, it is important to equip them with resources and tools to take sound decisions and factor in risks during that process.

One such resource is UQ's Modern Slavery Risk Assessment Tool. Developed during 2022, it uses a set of simple questions answered by the person engaging an entity for UQ business purposes and auto-populates a modern slavery risk score for the entity for the engagement being assessed. Based on the risk score, recommendations are then provided to the user to consider and implement for the engagement.

During the reporting period, we promoted the use of this tool across the UQ community. We also updated it to reflect the findings from the 2023 Global Slavery Index.

Student recruitment control monitoring

Student recruitment activities can be vulnerable to exploitation and various forms of modern slavery, such as forced labour or human trafficking.

During the reporting period, media reported on increasing illegal activity in the student recruitment industry. These reports provided insights on how criminal syndicates are bringing fake students into Australia to work in their illegal operations by exploiting the nation's education visa and migration systems. There were also reports indicating how overseas students have vanished from courses and then been found working in exploitative conditions.

While these external factors are outside our direct control, we recognise that we have a role to play. In response, we implemented a range of new initiatives during the reporting period aimed at raising awareness among students and upskilling our staff to be able to appropriately identify and respond to modern slavery red flags and concerns.

As a proactive measure, we also re-undertook a detailed risk assessment of our activities in this space.

See Case study 1



Case study 1: Risk assessment – student recruitment activity

With over 21,500 international students from more than 137 countries, the University engages a diverse range of third-party recruitment agencies within Australia and globally. These student recruitment activities are managed by the Future Students unit, as part of the Deputy Vice-Chancellor (Global Engagement) portfolio.

Recruitment agencies provide detailed information and guidance to prospective students, match students to universities that best meet their needs, and assist students with application processes and documentation. Agents are paid commissions by the University when students successfully enrol in, and complete a portion of, a course of study at UQ.

In working with international student recruitment agents, UQ complies with the *Education Services for Overseas Students Act 2000 (ESOS)*. An Agent Management Framework has been established to ensure compliance and minimise the risks in agent engagements while protecting the welfare of our international students. This framework involves:

- a rigorous due diligence process with:
 - requirements for a physical presence in the country the agent is recruiting from
 - comprehensive reference checks from other universities and contacts in specific regions
 - requirements for executive level review and approval of new agents
 - active account management of all agencies, including scheduled ongoing training of frontline staff
 - requirements to explicitly publish a list of approved agents on the university website.
 - a contractual framework which details:
 - strict terms for agent conduct and requirements for performance review
 - terms describing the corrective actions that may be taken should conditions not be met, including the ability to reclaim commissions and terminate agreements if prohibited conduct or failure to take corrective action occurs.
- While a specific clause on modern slavery has not yet been added into our agreement templates for international recruitment agents, amendments are intended in new agreements from 2024.
- Ongoing monitoring, review and relationship management:
 - The Future Students team meets and performs contract review of all agents twice per year to confirm that all ESOS requirements are maintained and that students are genuine students.
 - This contractual management is conducted separately to the ongoing relationship management providing an additional layer of central oversight.
 - Regular training by the Future Students team on changing compliance requirements and program information.
- Beyond the work done with recruitment agents, our support services offer a wealth of information, assistance and guidance to help our students navigate their transition to studying in Australia. All international students are required to attend orientation programs to prepare them for study and keep them safe in Australia.

Supply chain – Risk assessment and engagement

Supply chain risk assessment

During the reporting period, we expanded our previously piloted supply chain risk assessment process. This focused on:

- refining our risk mapping
- maturing our draft framework for modern slavery due diligence of UQ's supply chain
- using insights from the 2022 pilot supply chain risk assessment to determine where to focus our efforts and resources.

See *Case study 2*

Improving procurement data analytics

Robust data analytics aid in visualising complex supply chain data through dashboards and reports. This can help us understand and communicate modern slavery risks and prioritise our actions and resources accordingly. Data analytics can also enhance our due diligence processes by providing objective and evidence-based insights, resulting in stronger decision-making and a more comprehensive risk assessment process.

During the reporting period, we worked closely with our peers in the AUPN to identify a procurement analytics service solution. This solution has the potential to transform our data analytics capability, improving the visibility of the supply chain. This solution will be a progressive enabler and core building block for supply chain visibility and analysis.

The identified solution will be implemented in 2024.

Supplier risk portal

An important component of the AUPN anti-slavery program is the technology platform (supplier risk portal) to understand risk, support action, and contribute to a modern slavery program of works of individual universities.

During the reporting period, we continued to work with the AUPN to refine and improve the output and insights from the supplier risk portal and to resolve technical issues, support training, and develop guidance on how to use the portal.

Source to contract platform

During the reporting period, we successfully rolled out UQProcure, our source to contract digital procurement platform. The platform offers numerous benefits including increased efficiency, improved visibility and control, and enhanced collaboration, risk mitigation and data-driven insights.

Our efforts in 2024 will focus on leveraging this platform to embed supplier due diligence, risk assessment and awareness-raising as part of the supplier registration and management activities. This will also help improve the quality of information received by UQ and simplify the onboarding experience for our suppliers, who must deal with numerous due diligence requests from their customers and partners.

UQProcure is a key enabler of our risk management program and not a tool to directly address modern slavery risks.

Case study 2: Supply chain risk assessment

To ensure our suppliers operate in a manner that respects human rights, we conducted a risk assessment on targeted high-risk suppliers to identify and manage modern slavery risks, and promote ethical practices,

First, using UQ's Risk Model, we identified suppliers with an inherent high-risk score for modern slavery, and then we selected suppliers within UQ Approved Supply Arrangements where either the supplier was based in a high-risk country for modern slavery or supplied goods or services that belonged to a high-risk procurement category.

We then conducted desktop research to answer the following questions:

- Are there any adverse media releases and/or information of concern in relation to the supplier or the industry in which the supplier operates?
- Has the supplier issued a Modern Slavery Statement? (Where this was the case, we assessed the Statement to understand the strength of modern slavery controls that the supplier has put in place.)
- Is there any information about awareness programs and training provided by the supplier on modern slavery or has the supplier implemented robust modern slavery controls that provide adequate assurance?
- Is any information about the supplier available through the AUPN modern slavery program of works?
- Does UQ have existing contractual protections for the supplier?

These answers determined the suppliers' residual modern slavery risk score after which we undertook assurance actions. We discussed our findings with our procurement specialists and category management teams and considered factors such as our strength of relationship with the supplier, value of spend, level of current engagement with the supplier, and the most practical actions to take.

Summary of outcomes	# of suppliers
No immediate action required based on our assessment <i>We will watch out for any adverse media releases in relation to the entity or major changes in the entity's operations and/or structure that may have an impact on the modern slavery risk assessment</i>	154
Share tools and resources with suppliers to increase supplier awareness and knowledge of modern slavery risks	76
Send a Supplier Assessment Questionnaire to the supplier seeking more information around their modern slavery risks and controls <i>During 2024, the questionnaire responses will be analysed to understand the breadth and depth of supplier responses to modern slavery and human rights in general. A follow-up review will be scheduled as part of supplier management program to keep the issue alive in discussion/ongoing relationship with supplier</i>	60
Referral to Category Management team and/or Contract Manager <i>Actions to be managed by Category Management team and/or Contract Manager as part of ongoing relationship management</i>	63
Total	353

We then established a feedback loop with our procurement specialists and category management teams. This feedback, coupled with learnings from our engagement with suppliers, will help us adjust our approach and determine the level of resourcing and effort required to extend the risk assessment process to our Tier 2 suppliers. This work will also feed into improving our draft framework for modern slavery due diligence of UQ's supply chain created during 2022.

Our aim is to be pragmatic in our approach and think practically about what we expect from our suppliers, how we validate and assess that information, and how we can continue to deepen conversations in the areas identified as high-risk. Working in partnership with our suppliers will help us take a constructive and supportive approach to understanding risks and requirements.

Learnings	Planned actions
Improving our spend analytics capability is crucial to inform our supply chain due diligence efforts	Implement a procurement data analytics service solution and reduce reliance on natural account codes used to record expenditure
Improve robustness of supplier risk methodology to be able to provide end-to-end risk optics from raw material/primary inputs to finished products/services, product industries, geographies and suppliers, including sub-tier suppliers to primary suppliers	Continue collaboration with the AUPN in relation to a supplier risk portal
Embed supplier due diligence, risk assessment and awareness-raising as part of the supplier engagement process	Leverage UQ's UQProcure platform for supplier due diligence at commencement of specific engagements
Facilitate information sharing across the University in relation to supplier risk assessment	Continue with training and awareness initiatives across the buying community at UQ Leverage UQ's UQProcure platform to record supplier risk assessments

Pages 20 and 22 provide details of these planned actions.

Managing media alerts

Managing media alerts related to modern slavery about suppliers can be a crucial aspect of supply chain risk management. It ensures an informed approach to address potential risks and take appropriate actions to identify and mitigate modern slavery risks with suppliers.

During the reporting period, we implemented a process to handle media alerts for UQ's suppliers and the industries they operate in. A portion of this work was done in conjunction with our peer universities at the AUPN.

These alerts help us track and capture relevant news and reports related to modern slavery. Upon receiving these alerts, we analyse the information to determine its accuracy and credibility to separate genuine alerts from unsubstantiated or misleading information.

Once a credible media alert is identified, we proactively engage with the supplier to investigate the allegations. This includes seeking clarification and evidence to either confirm or refute them. Based on the investigation and assessment of media alerts, we would consider taking appropriate actions to mitigate modern slavery risks. This may include requiring the supplier to undergo third-party audits, implementing stronger contractual obligations and establishing compliance training programs.

Findings are recorded and communicated to UQ's Anti-slavery Working Group.

During 2024, we will reassess the relevance and effectiveness of media monitoring criteria, refine strategies, and adapt to emerging risks or patterns identified through media alerts.

Supplier standards

During the reporting period, we continued to reference our **Supplier Standards** in our supplier interactions and relationship management practices. These standards set UQ's principal expectations of suppliers to ensure that our suppliers endeavour to operate ethically and responsibly, while promoting fair labour practices, human rights and environmental sustainability. We can also foster better relationships with suppliers by establishing clear expectations and promoting open communication. We encourage our suppliers to align with UQ's values, leading to more collaborative, long-lasting and mutually beneficial partnerships.

Establishing effective strategic partnerships with our suppliers

We recognise that establishing supplier panel arrangements when complemented by other risk management strategies is a strong control measure to address modern slavery risks in the supply chain in the following ways:

- opportunity to conduct thorough due diligence on potential suppliers including assessing their policies, practices, and procedures related to labour rights, human trafficking, and modern slavery. By carefully selecting suppliers who demonstrate a commitment to ethical practices, we can reduce the likelihood of engaging with suppliers involved in modern slavery
- opportunity to exercise greater control and oversight over suppliers on the panel through closer contract management activity and ongoing collaboration and engagement

- promoting transparency and traceability within the supply chain by encouraging panel suppliers to provide information about their supply chains, including the origin of raw materials and the labour conditions involved.

UQ encourages establishing panel arrangements where relevant as a solution to procurement challenges.

See *Case study 3*

Capability building

Marking the International Day for the Abolition of Slavery

International Day for the Abolition of Slavery falls annually on December 2 and calls on governments and societies to recommit to eradicating slavery. Increased action needs to be taken with full participation of all stakeholders, including the private sector, public sector, civil society and human rights institutions.

This day compels us to recognise that slavery is not simply a historical relic but subsists in mutated forms of exploitation and human commodification today – frequently termed 'modern slavery'.

UQ observed the day with several awareness-raising initiatives including communication from our senior management. We also put in place computer lock screens and published articles in our staff update channels with a call to action for our staff – our first line of defence in our fight against modern slavery.

Training module for staff on modern slavery

It is important that our staff, especially our decision-makers, understand modern slavery red flags and how to report concerns.

During the reporting period, we launched an online training module on modern slavery for both our staff and staff of our controlled entities.

This short but comprehensive module introduces modern slavery and its indicators, presents an overview of what UQ is doing in this space and guides staff on how they can play a part in its eradication. The other aim is to integrate modern slavery risk considerations across all our business practices and ensure that over time, thinking about these risks when engaging entities becomes a business-as-usual practice.

All staff were strongly encouraged to complete this module, particularly those involved in procurement activities or engagement with external entities.

The module received excellent feedback. As of 31 December 2023, 423 UQ staff had completed it.

Panel discussion on 'Laws Beyond Borders'

During May 2023, UQ's Law School organised a panel webinar titled 'Laws Beyond Borders: Challenges and opportunities for implementing the *Modern Slavery Act 2018 (Cth)*'. This webinar was a joint initiative with UQ Business School's Trust, Ethics, and Governance Alliance.

This panel brought UQ academics together with other contributors to discuss these challenges and opportunities, and to consider Australian modern slavery laws in their broader global context. The Chair of UQ's Anti-slavery Working Group spoke at the event and shared their insights on challenges encountered during implementation of UQ's program to address modern slavery risks.



Case study 3: Refreshing UQ's Print panel

Background

In 2023, we conducted a full procurement exercise to renew the UQ Print supply panel for printing, merchandise, mail and apparel. One of the panel's original objectives was to help reduce the high risks of modern slavery identified in the garment and textile industry because of factors such as:

- vulnerable workforce
- labour-intensive sector
- high-risk jurisdictions (lower labour standards)
- manufacturers removed from consumers in the supply chain
- a business model heavily reliant on sub-contracting.

While the centralised procurement of print, merchandise and apparel significantly reduces the risks associated with modern slavery, effective and continual due diligence of the supply panel is critical to continuously work towards identifying and eliminating these risks and practices. This was carefully considered during the refresh, particularly when evaluating, shortlisting and awarding both new and existing suppliers to the panel.

UQProcure was used to include targeted questions to suppliers around their sustainable and responsible procurement practices, policies and procedures. These questions included environmental and sustainable practices, Indigenous employment policies and their alignment with the principles of the *Modern Slavery Act 2018 (Cth)*. All suppliers who submitted an offer were required to answer these compulsory questions in detail for their submission to be considered competitive.

'Sustainability, environmental and social considerations' was one of the weighted evaluation criteria for this tender. This ensured that only suppliers who demonstrated a strong commitment to these practices scored highly enough to be shortlisted and awarded a place on the panel.

Ethical and social procurement was included on the agenda for supplier presentations, giving shortlisted suppliers the opportunity to provide an in-depth look at how they managed their supply chains and suppliers. Examples of this included:

- suppliers who committed to annual visits by senior leadership to offshore factories
- suppliers who employed local agents to monitor and report on offshore factories
- evidence of environmental and ethical accreditation via international recognised audit processes across their supply chain, e.g. SEDEX, for sustainable supply chain solutions.

Developing and maintaining long-term, strategic relationships with our existing and new panel suppliers is a key consideration in this process, with robust mechanisms in performance management for all panel suppliers. This continues to be a 6-monthly regular review, conducted in-person to discuss the progress and maintenance of ethical sourcing and reporting.



Case study 4: Student–Staff partnership on modern slavery project

In 2022, UQ's School of Social Science in the Faculty of Humanities, Arts and Social Sciences was awarded a Teaching Innovation Grant to educate first-year students about how social scientists address modern slavery. The project's goal is to increase student awareness of how different disciplines complement one another in addressing major social challenges such as modern slavery.

A Student–Staff partnership was formed to co-create the teaching and assessment activities that will be used to teach first-year students about the history, prevalence and forms of human enslavement in Australia today and explore notions of community identity and culture in this context.

The project will demonstrate the value of different disciplinary lenses and skills in recognising, analysing and addressing human enslavement. Student engagement will be enhanced using novel multi-layered teaching and assessment activities, drawing on visual media to enhance learning outcomes to enable students to:

- see the value of social sciences in the workplace
- recognise their technical skills that support problem-solving
- imagine paths for their future employment
- develop their professional identity
- develop a sense of belonging to an inter-related set of social science disciplines.

These modern slavery-related materials will be integrated into multiple weeks of first-year courses across archaeology, anthropology, criminology and social science disciplines

Student engagement

Our focus during the reporting period was to improve knowledge and awareness of modern slavery risks across our student community. This was achieved via:

- working closely with subject-matter experts to build a comprehensive student-facing webpage on modern slavery risks relevant to students as a key communication tool and source of information. The webpage was designed to help students understand various forms of modern slavery (and other exploitative practices), to clearly communicate that these practices are unlawful, and to provide information as to how to seek appropriate assistance and support in the event that they or someone they know has or is experiencing these crimes
- inviting UQ's student cohort to the webinar on tackling modern slavery delivered as part of UQ's Sustainability Week
- engaging with our student-facing staff to raise awareness of these risks and red flags so they are better able to support students.

During 2024, we will look to partner with local anti-slavery organisations to organise joint awareness events that will provide students with practical exposure and a chance to contribute to the cause.

Student-Staff Partnership Projects

UQ's Student-Staff Partnership Projects provide a valuable opportunity for students and staff to co-develop and deliver initiatives.

During the reporting period, UQ's School of Social Sciences and student partners co-developed materials and support resources to integrate modern slavery into various courses. This project supports UQ's ambitions to increase student and academic engagement in this space and raise awareness of these risks.

See *Case study 4*

Other awareness-raising initiatives undertaken during the reporting period

During the reporting year, we undertook a range of other measures to raise awareness of modern slavery risks across our staff cohort including:

- presenting to members of the Procurement Community of Practice – a network of UQ professionals who share a common interest in procurement and collaborate to enhance their knowledge, skills, and best practices in the field
- distributing information posters across our campuses
- presenting workshops to procurement specialists on considering modern slavery risks as part of procurement strategy formation, risk management and tender evaluation
- presenting a webinar on tackling modern slavery as part of UQ's Sustainability Week
- engaging with UQ's Commercial Operations and Corporate Services team to share materials, tools and resources on universities' responsibilities for working conditions in contractor and tenant businesses

These initiatives are in addition to other training programs provided at UQ on appropriate workplace behaviour, mental health, fraud and corruption, and our **Code of Conduct** and ethics and compliance policies.





Assessing awareness of modern slavery risks across UQ staff

During the reporting period, we undertook a survey to understand the current level of awareness of modern slavery among UQ staff.

220 staff responded to the survey. We analysed the survey responses and found that:

- 70% of respondents have a moderate or higher understanding of what modern slavery is and what activities constitute modern slavery – a 10% increase from the December 2022 survey
- 47% had seen or read UQ's 2022 *Modern Slavery Statement* and 33% had visited UQ's modern slavery webpage at least once
- 38% feel equipped to identify potential red flags and 41% knew where to go for support if they observed modern slavery practices.

While the general increase in understanding modern slavery is encouraging, these results indicate that we have further to go in raising staff awareness of risks and escalation pathways.

Findings from the survey will be presented to UQ's Anti-slavery Working Group and will guide recommendations for improving staff awareness of modern slavery risks including targeted training programs and awareness campaigns.

Remediation framework (Escalation pathways, monitoring and reporting)

We support open and transparent working relationships across our operations and supply chain, where concerns about modern slavery or broader human rights issues can be safely voiced. It is important our stakeholders have access to a range of reporting pathways that are trusted and easily accessible.

Our escalation pathways are publicly available for any individual to raise complaints relating to our operations and our supply chains, including any concerns about modern slavery.

During 2023, we continued to promote our escalation pathways for modern slavery concerns. We shared information on these pathways at various UQ forums and supplemented this via engagement initiatives targeting UQ staff, students and our controlled entities. We encourage our stakeholders to report any suspected unethical, illegal, fraudulent or undesirable conduct within our own operations and supply chain, including suspected modern slavery and other adverse impacts on people, communities or the environment.

We also used our **suppliers' webpage** to raise awareness of these reporting mechanisms across our supply chain and workers therein.

We received one concern through the reporting portal during the year. The submission was made anonymously and did not contain sufficient information to enable us to identify a specific engagement or relationship to investigate the situation.

We consulted with a civil society organisation on our draft process in relation to management of identified concerns for modern slavery. We hope to use the feedback received to further improve our process around managing modern slavery concerns and ensuring key considerations are taken into account before recommending a course of action.

Working through building a practical plan for corrective action and remedy has been challenging. We plan to engage with our peers in other universities and seek assistance from civil society organisations to ensure we build a practical and achievable framework around remediation.

Mapping against our action plan

We continued to monitor progress against our commitments and identified priorities for future years as specific reporting against the broad indicators of our Modern Slavery Action Plan.

Management support – senior leadership engagement

- Stakeholder engagement
- Capability building

Actions during the reporting period (2023)

- Conducted a survey to gauge staff awareness of modern slavery risks. Results of this survey will inform ongoing design of training initiatives and provide useful insights on ways to improve capability.

Plan for 2024 and beyond

- Continue regular education and engagement activities with senior management.
- Provide regular updates to UQ governance bodies.
- Establish reporting to measure effectiveness of actions.

Anti-slavery Working Group

- Stakeholder engagement
- Capability building
- Monitoring and reporting

Actions during the reporting period (2023)

- Embedded cycle of UQ's modern slavery statement production into annual calendar of work.
- Reviewed and refreshed membership of the Working Group to ensure relevancy and provide opportunities to stakeholders across the University to contribute to the group.
- Refreshed the Working Group Charter and terms of reference.

Plan for 2024 and beyond

- Review and refresh membership of the Working Group as necessary.

Operational risk identification, prioritisation and management

- Risk assessment
- Monitoring and reporting

Actions during the reporting period (2023)

- Promoted use of UQ's Modern Slavery Risk Assessment tool.
- Progressed our work on strengthening the due diligence process for UQ's research partners and collaborators.
- Improved our engagement with students on modern slavery issues.

Plan for 2024 and beyond

- Finalise the modern slavery risk assessment framework.
- Rollout refreshed framework and platform for conducting due diligence of UQ's research partners and collaborators.
- Progress the review of UQ's volunteer engagement framework.

Sector-wide collaboration

- Risk assessment
- Capability building
- Remediation

Actions during the reporting period (2023)

- Continued engagement with other universities through collaboration with the AUPN to identify best-practice approaches to modern slavery due diligence in the supply chain and research ways to maximise our collective impact in this space.

Plan for 2024 and beyond

- Leverage the supplier risk portal available through the AUPN to inform specific supplier due diligence activities.
- Continue engagement with the AUPN and broader industry stakeholders to reduce duplication of efforts towards shared social outcomes.

- Risk assessment
- Supplier engagement
- Monitoring and reporting

Supplier risk identification, prioritisation and management

Actions during the reporting period (2023)

- Embedded UQ's 'Supplier Standards' document within supplier invitation processes.
- Improved supply chain visibility and contract management practices by establishing arrangements across a selection of key spend areas and progressing the implementation of UQProcure digital procurement platform.
- Developed practical insights on the application of the Local Benefits Test to select procurement activities to encourage and support local suppliers to supply to UQ.
- Participated in AUPN modern slavery program of works.
- Conducted modern slavery risk assessment on 353 suppliers including undertaking follow-up actions.
- Introduced opportunities for supply chain due diligence within the procurement strategy formulation, risk assessment and supplier invitation materials within UQProcure.

Plan for 2024 and beyond

- Design and implement supplier engagement and awareness initiatives based on risk assessment as part of enhanced due diligence activities.
- Review opportunities for embedding modern slavery due diligence into contractor and supplier onboarding and management processes.
- Explore pathways to issue the Supplier Standards using the procurement digital platform.
- Continue working with the AUPN on the supplier risk portal to cover application of consistent and structured due diligence processes and specific supplier engagement activity based on supplier risk profile.
- Introduce category-specific sessions with Category Managers covering modern slavery risk assessment of UQ's supplier base.
- Leverage the supplier risk assessment work being done by UQ to conduct further due diligence on the supply chain of its controlled entities.
- Continue to embed our responsible sourcing practices including maturing consistent and risk-based due diligence of our suppliers.
- Improve our supply chain data insights and supplier risk methodology.

Education, training and capability uplift

- Capability building

Actions during the reporting period (2023)

- Continued to build the capability and competency of our stakeholders to identify, assess and address modern slavery risks using a mix of initiatives including webinar, communication pieces, webpages, posters and surveys.
- Developed UQ learning module on modern slavery to improve understanding and assessment of modern slavery risks in the UQ context.

Plan for 2024 and beyond

- Develop appropriate guidance material and training programs for the UQ buying community to assist with identification of high-risk areas and approaching those effectively.

Remediation

- Escalation pathways
- Remediation

Actions during the reporting period (2023)

- Consulted on draft template that outlines the process that UQ will follow in relation to management of identified concerns for modern slavery.
- Managed modern slavery concern/s escalated to the Anti-slavery Working Group.

Plan for 2024 and beyond

- Build a corrective action plan template as part of UQ's remediation framework.

Governance, Risk and Policy framework

- Governance framework

Actions during the reporting period (2023)

- Updated UQ's Modern Slavery Risk Assessment Tool to reflect the **2023 Global Slavery Index** findings.
- Updated UQ's purchase order terms and conditions to include modern slavery clauses.

Plan for 2024 and beyond

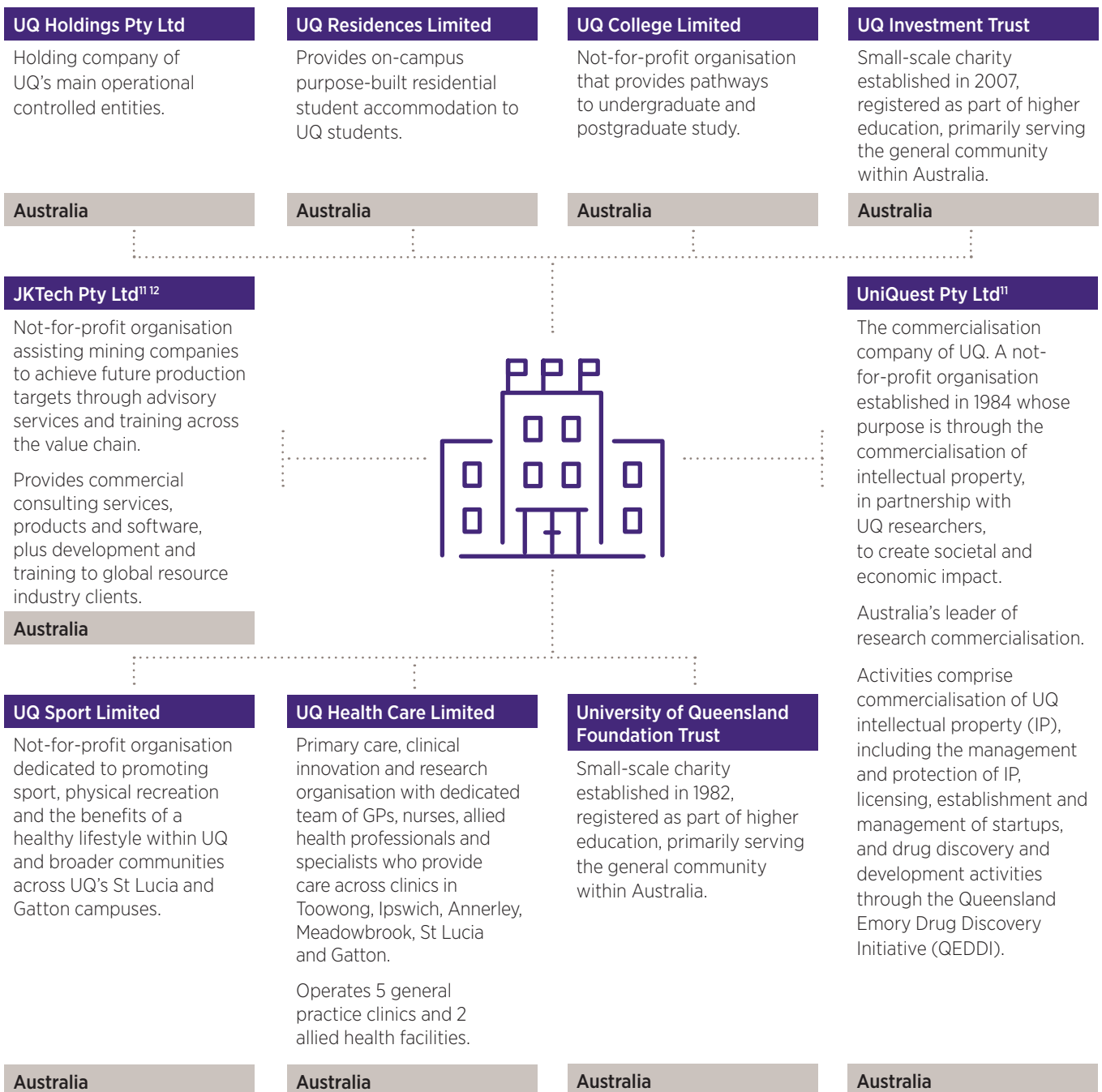
- Ongoing review and improvement of policies, procedures and processes and contractual mechanisms to increase their effectiveness in helping to manage UQ's modern slavery risks.

UQ controlled entities

Overview

UQ's Controlled Entities Policy provides a framework in relation to the creation, acquisition or additional investment in a controlled entity; and ensures that controlled entities are managed appropriately and meet their stated objectives.

In accordance with the *University of Queensland Act 1998*, the University has established controlled entities as outlined in the table below. All currently operating controlled entities are headquartered in Australia.¹⁰



¹⁰ UQ Jakarta Office Pty Ltd was an organisation located in Indonesia that aimed to collaborate with universities, government agencies, corporate networks and non-governmental organisations; support UQ alumni in the wider South-East Asian region; and increase engagement with industry partners. It is currently in the process of being deregistered.

¹¹ This controlled entity is also a parent company to other subsidiaries

¹² JKTech is an industry-facing arm of the world's foremost bodies of mineral processing and extraction knowledge (i.e. the Julius Kruttschnitt Mineral Research Centre (JKMRC) and the WH Bryan Mining and Geology Research Centre (BRC), both of which are Centres within UQ's Sustainable Minerals Institute). JKTech P/L's subsidiary is established in South America. The focus of the subsidiary entity 'SMI-ICE Chile SpA' is research activities focused on Chile but can also encompass other countries within Latin America. SMI-ICE-Chile can also provide commercial consulting services and professional development and training.

Key insights on modern slavery risks and controls

Our controlled entities of UQ Holdings Pty Ltd, UQ Investment Trust Group and University of Queensland Foundation Trust are passive investment bodies and do not engage in operating activities. We therefore consider that our position on modern slavery does not greatly change with these entities considered, and consultation is minimal.

UQ's engagement during the reporting period with the other 6 controlled entities on modern slavery is described below:

UniQuest Pty Ltd

Modern slavery risks in relation to UniQuest's operations, which include engagements with partners (both domestic and international) and contract research organisations, is assessed as low. UniQuest has comprehensive due diligence processes in place, as well as a robust governance and contractual framework with associated monitoring and reporting mechanisms.

While UniQuest's supply chain risks are not materially different to that of UQ's own supply chain, the volume and value of procurement is relatively low, allowing modern slavery risks to be assessed and mitigated.

During 2023, UniQuest raised staff modern slavery awareness by sharing the UQ awareness training module and marking International Day for the Abolition of Slavery with the release of resources and materials on its staff intranet. UniQuest is represented on UQ's Anti-slavery Working Group.

UQ College Limited

During 2023, UQ College focused on raising general awareness across its buying community and finance staff involved in the procurement and purchasing processes. The risk register for the College recognises modern slavery as a risk in its supply chain.

UQ College leverages UQ's supply chain to the extent possible and practicable to meet its procurement needs. A high-level assessment of those suppliers indicated a low risk from a modern slavery perspective.

During 2023, the College planned to trial the use of UQ's Modern Slavery Risk Assessment Tool to reassess its suppliers for modern slavery risks and report findings through its Risk Register. This reassessment was found to be unnecessary as the College engages mostly domestic suppliers and the majority of purchases are below the \$200,000 value threshold for mandatory use of the Tool.

The College continues to raise awareness through reiterating the importance of risk assessments and due diligence of the supply chain.

UQ Health Care Limited

UQ Health Care made a concerted effort to raise awareness within the organisation around modern slavery during 2023, including:

- the General Manager becoming a member of the Anti-slavery Working Group
- modern slavery awareness training being introduced in November to all managers and staff involved in procurement of goods and services across the organisation with 3 of 7 managers having completed it
- a full review of current suppliers being conducted, taking into account the principles and guidelines set out by the Anti-slavery Working Group. During this review, some suppliers were deemed high-risk and alternative suppliers were sought
- UQ Health Care working with UQ Legal to develop and implement a modern slavery clause in all supplier contracts
- new suppliers being vetted against the modern slavery risk assessment tool and inclusion of the modern slavery clause into all procurement contracts to reduce the potential incidents of modern slavery in our supply chain
- circulating posters and pamphlets around modern slavery awareness to each clinic for distribution and display, which promotes awareness not only within UQ Health Care but in the wider community
- having modern slavery as a standing agenda item for the monthly leaders meeting. The General Manager as the representative of the Anti-slavery Working Group provides updates and tools as required.

The goal for 2024 is to continue the awareness campaign within the business, including all new managers.

UQ Sport Limited

UQ Sport's supply chain risks are not notably different to UQ's supply chain, with the exception of procurement categories such as contractors for delivery of fitness training and sporting goods and equipment. The majority of direct spend is with Australian suppliers. Wherever possible, UQ's supplier panel arrangements are leveraged. In line with UQ Sport's commitment to socially responsible procurement, the following accreditations are affiliated with apparel merchandise.

Global Organic Textile Standard (GOTS)

GOTS is the worldwide leading textile-processing standard for organic fibres, including ecological and social criteria, backed by independent certification of the entire textile supply chain. Textiles certified to GOTS provide credible assurance to the consumer from the harvesting of raw materials, and environmentally and socially responsible manufacturing to labelling.

Fairtrade

Fairtrade promotes stable prices, decent working conditions, and the empowerment of farmers and workers around the world. Fairtrade's approach enables farmers and workers to have more control over their lives and choose how to invest in their future. By choosing Fairtrade apparel, people can create change through their everyday actions. A product with the Fairtrade logo means producers and businesses have met internationally agreed upon and independently certified standards. Farmers and workers have a strong voice at every level – from how they invest in and run their local organisations to having an equal say in Fairtrade's global decision-making.

Fair Wear

UQ Shop is the Australian distributor for Continental Clothing and Stanley Stella who are Fair Wear Foundation members. The Fair Wear Foundation is an independent, non-profit organisation that works with companies and factories to improve labour conditions for garment workers.

Carbon neutral

Carbon neutrality refers to achieving net-zero carbon dioxide emissions. It is used in the context of carbon dioxide-releasing processes associated with transportation, energy production, agriculture and industry.

JKTech Pty Ltd

JKTech's supply chain risks are not materially different to those of UQ's own supply chain.

Due to the governance structure and contractual frameworks, comprehensive due diligence processes and reporting requirements, modern slavery risks associated with JKTech's offshore operations and engagements are assessed as low.

Specific actions undertaken during 2023 included:

- membership of UQ's Anti-slavery Working Group
- ensuring that JKTech's terms and conditions of supply impose positive obligations on each party when performing its obligations under the contract, to comply with all applicable modern slavery laws
- engaging with UQ's Anti-slavery Working Group to obtain assistance with assessing the modern slavery risks of potential clients.

UQ Residences Limited

UQ Residences leverages UQ's supply chain to meet its procurement requirements for printing, cleaning, catering and bed linen. Many of these suppliers take active steps in modern slavery risk mitigation and submit their own Modern Slavery Statements.

In the property management and rental industry, there is a general risk of rental properties being utilised for trafficking purposes. UQ Residences considers the likelihood of this risk eventuating as extremely low due to the following implemented controls, which offer multiple layers of security:

- student accommodation towers are secured at all entrances and are only accessible with individual security passes, and buildings are monitored and have CCTV cameras, with staff and/or security staff on premises 24/7
- security passes in the towers are linked to individual accounts with photo ID for verification
- under 18-year-old students have co-signature requirements with parents/guardians who are also listed as contacts, and must also adhere to curfews and sign-in times as prescribed by UQ
- rooms and houses are only tenanted with registered UQ students or staff members, whose identities are linked to either student numbers or registered with UQ's human resources team.

Senior management of UQ Residences attend UQ's Modern Slavery briefing sessions to raise their awareness of the risks of modern slavery and human trafficking. If there are any concerns about modern slavery issues, they would be reported to UQ and the relevant authorities.

Assessing our effectiveness

We recognise the critical importance of measuring the outcomes of our efforts and evaluating our effectiveness and long-term impact. We monitor and report on a range of indicators to assess the effectiveness of our approach to identifying, assessing, managing, mitigating and reporting modern slavery risk. We believe this helps with transparency and accountability.

While we will continue to refine and improve our approach to impact measurement and enhance the effectiveness measures over time, the indicators in this Table provide a high-level overview on the effectiveness of our efforts within each of our focus areas.

Area	Targeted long-term impact	How do we measure impact of our actions?	Indicators used during the reporting period	2022 results	2023 progress
Stakeholder engagement Anti-slavery Working Group	Our Working Group explores challenges and best practices in the modern slavery space, as well as being regarded as UQ's peak engagement body on modern slavery issues	Are Working Group members experts on different dimensions of contemporary slavery and do they share an ambitious commitment to achieving change?	Number of times the Working Group met during the year	6	4
			Number of membership changes to the Working Group	2	7
Governance framework Management support – senior leadership engagement	Our leaders provide a clear vision and drive for addressing modern slavery issues as well as a pathway of accountability	Are our leaders passionate about and take active interest in human rights issues?	Number of engagement activities with senior management	6	7
			Number of updates to UQ governance bodies	1	1
Modern slavery risk assessment Operational risk identification, prioritisation and management	Our organisational units manage their modern slavery risks in line with good practice	Do we have robust due diligence processes to identify, prevent, mitigate and account for how modern-slavery risks are addressed?	Number of modern slavery flags raised through entity engagement processes	3	1
Supplier engagement Supplier risk identification, prioritisation and management	UQ's buying community manage modern slavery risks in supplier engagements in line with good practice with due support by experts in the UQ Procurement team	Do we have robust due diligence processes to identify, prevent, mitigate and account for how modern-slavery risks are addressed?	Number of suppliers on whom risk assessments were undertaken	50	353
			Number of supply invitation materials issued that included questions in relation to modern slavery	40	45

Area	Targeted long-term impact	How do we measure impact of our actions?	Indicators used during the reporting period	2022 results	2023 progress
Capability building Sector-wide collaboration	We have achieved the desired level of collaboration to gain sufficient leverage to drive change in behaviour as well as sharing activities, learning and innovation to accelerate improving conditions for workers within our operations and supply chains	Are we able to tackle common problems, mitigate risks and improve practices in the longer term by collaborating with other entities?	Feedback received from our stakeholders	0	No negative feedback received from stakeholders
			Number of modern slavery issues addressed through collaboration	0	0
			Number of best practices shared and scaled more widely each year	0	0
Stakeholder engagement Education, training and capability uplift	Our employees understand what modern slavery is and act with integrity and courage to prevent and address it Our broader stakeholder base including the entities we engage with and their workers and UQ students understand modern slavery and know where to escalate and go for support	Is our awareness campaign improving our stakeholder understanding of modern slavery risks and escalation pathways? Are stakeholders engaging with our promotional and information resources	Insights from surveys released to gauge awareness of modern slavery	72% of staff who responded to UQ's modern slavery staff awareness survey know what modern slavery means	90% of staff who responded to UQ's modern slavery staff awareness survey have a slightly of higher understanding of what modern slavery means
				An average of 44% of staff who responded to UQ's modern slavery staff awareness survey feel equipped to identify potential red flags at UQ	An average of 38% of staff who responded to UQ's modern slavery staff awareness survey feel equipped to identify potential red flags at UQ
			Number of times activities and actions related to modern slavery were communicated to all or a section of employees	6	7
			Number of staff who have completed code of conduct training	10,000+	97% of all UQ staff have completed code of conduct training.
			Number of staff trained on modern slavery	Not possible to calculate	423 completions of modern slavery awareness training
			Effectiveness of available modern slavery training	N/A	4/5
			Rate of engagement with our website materials, social media posts and communications	An average of 136 views of UQ's modern slavery web page per month	An average of 175 views of UQ's modern slavery web page per month
				UQ Supplier Standards downloaded 85 times since publication	UQ Supplier Standards downloaded 256 times since publication
Monitoring and reporting Governance, risk and policy framework	Our governance and policy framework affirms our commitment to contribute to ending all forms of modern slavery and supports the expectation of a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations	Do we have clear policies setting out modern slavery-related expectations of our employees and wider stakeholder base including our suppliers, and other parties directly linked to operations, products, or services?	Number of policy materials refreshed or introduced each year which address modern slavery risks and controls	2	1
			Number of contract templates which include modern slavery clauses	0	5

Area	Targeted long-term impact	How do we measure impact of our actions?	Indicators used during the reporting period	2022 results	2023 progress
Escalation pathways	Our escalation pathways are accessible to workers who are victims of modern slavery	Do we have processes to enable the escalation of any modern slavery-related incidents that we identify we have caused or contributed to, or directly linked to?	Number of concerns reported through our reporting channels	3	1
Remediation	Our model of remediation is mature and consistent in application	Do we have processes to enable the remediation of any modern slavery-related incidents that we identify we have caused or contributed to, or directly linked to?	Number of cases where remediation was required	0	0



- Informal** – ad hoc/ incidental/inconsistent
- Documented** – emerging/ managed/standardised/ repeatable
- Integrated** – structured/ measured/disciplined/ competent
- Proactive** – continuous improvement/adaptive/ innovative

Policy commitment

Policy commitment to meet UQ’s responsibility to take steps to prevent, mitigate and, where appropriate, remedy modern slavery in UQ’s operations and supply chains.

Modern slavery due diligence

Develop and implement a modern slavery due diligence process to identify, prevent, mitigate and account for how UQ addresses its impacts on modern slavery risks.

Remediation framework

Develop and implement processes to enable the remediation of any adverse modern slavery impacts UQ causes or to which UQ contributes or is directly linked to.

Summary

We continued to take measures to combat modern slavery and welcomed feedback from stakeholders on our efforts during the reporting period. We are increasing the awareness and capability of our staff via training and other activities. Across high-risk countries and categories of supply, we continue to conduct supplier and partner entity risk assessments and build this work into ongoing discussions with our stakeholders. We have consistently focused on ensuring we partner with suppliers and entities who share our commitment to respecting human rights and treating everyone with dignity and respect.

It is essential that we continually seek opportunities to strengthen our modern slavery risk identification and management framework, and we welcome open and constructive discussion with stakeholders on future actions aimed at ending modern slavery.

Approval

This Modern Slavery Act statement was approved by The University of Queensland Senate in its role as principal governing body at its meeting on 25 June 2024 and signed by the Vice-Chancellor and President Professor Deborah Terry AC.



Compliance with mandatory criteria as outlined in the <i>Modern Slavery Act 2018 (Cth)</i> , s16(1)	Pages
a] Identify the reporting entity	1-3
b] Describe the reporting entity's structure, operations and supply chains	4-10
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	11-15
d] Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address those risks, including due diligence and remediation processes	16-27 28-30
e] Describe how the reporting entity assesses the effectiveness of such actions	31-33
f] Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	34
g] Provide any other relevant information	N/A

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Consultation

Our approach to addressing modern slavery risks goes beyond compliance and requires us to take our stakeholders with us on a journey of learning and understanding. This involves being open and transparent in sharing lessons learned and challenges faced in implementing our response.

During the reporting period, we led and participated in several collaborative initiatives across multiple pillars of our modern slavery response. A summary of our collaborative efforts is presented below.

Stakeholder group	Details
UQ's Governance bodies	UQ's Governance bodies reviewed and considered advanced drafts of this Statement prior to its consideration and approval by UQ's Senate.
UQ senior management and organisational units	UQ takes a consultative, whole-of-UQ approach to implementing its day-to-day modern slavery risk management approach. This work is driven by UQ's Anti-slavery Working Group in collaboration with relevant business units.
UQ controlled entities	<p>We work in a coordinated way with our controlled entities when implementing and monitoring actions aimed at addressing risks of modern slavery. While each entity's operations have points of difference to be considered, we strive to achieve consistency and alignment in our approach. We also share resources and lessons learned, thereby enabling us to build a stronger and more robust response.</p> <p>Three of our 6 active controlled entities have representation on UQ's Anti-slavery Working Group. Consultation with these controlled entities is thereby embedded in our work through regular Anti-slavery Working Group meetings and through working together to implement our modern slavery response.</p> <p>The senior management teams of all our active controlled entities were sent information packs during the year with tools and resources that highlighted our modern slavery obligations and commitments, informed them of the Statement, and invited questions, feedback and input prior to publication.</p> <p>UQ's training module on modern slavery is available for staff of UQ controlled entities to complete.</p>
Australasian University Procurement Network (AUPN)	<p>We continued to engage with our industry peers to pursue collaborative approaches to modern slavery and broader human rights challenges facing the tertiary sector through the AUPN.</p> <p>During the reporting period, we led and/or participated in several forums and sub-groups as part of this collaboration.</p>

During the reporting period, we continued to attend relevant forums and workshops to learn about other perspectives and follow best practice.

Modern slavery cannot be tackled alone. We are committed to working with and learning from peer institutions, suppliers, customers and civil society to continuously improve our understanding of modern slavery risks, controls and evolving regulatory environment.

We welcomed the recommendations from the review of the *Modern Slavery Act 2018 (Cth)* that are designed to ensure the law becomes more effective in combating modern slavery. While changes of this magnitude may not have an immediate impact, we believe they are steps in the right direction.

At our end, we are committed to adaptation, improvement and review of the processes by which we manage and meet our obligations to modern slavery. This will include extending our collaboration efforts to ensure the mechanisms by which we mitigate our exposure to modern slavery risk are sustainable and effective.