

MODERN SLAVERY STATEMENT 2025



LA TROBE
UNIVERSITY

latrobe.edu.au

Prepared by a staff member with AI assistance. The author has critically reviewed the content, exercised professional judgment, and is accountable for its accuracy.

ACKNOWLEDGEMENT OF TRADITIONAL OWNERS:

La Trobe University proudly acknowledges the traditional custodians of the lands on which its campuses are located on in Victoria.

We recognise that Indigenous Australians have an ongoing connection to the land and the University values their unique contribution both to the University and the wider Australian society.

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1. INTRODUCTION

La Trobe University (“the University”) is dedicated to ensuring that our operations and supply chains uphold human rights and adopts a zero-tolerance stance against slavery and human trafficking in any manifestation. The University aims to engage with suppliers who share its commitment to upholding and safeguarding human rights within their own organisations and supply chains.

This is the University’s sixth Statement pursuant to Part 2 of the *Modern Slavery Act 2018* for the reporting period 1 January to 31 December 2025. The Statement sets out the steps the University has taken and will take across our research, teaching and operational activities to address modern slavery.

Help and assistance

The University acknowledges that the content of this Statement may be distressing for individuals with lived experience of modern slavery or related harm. If you, a friend or a family member need support or would like to speak with someone, there are a range of support services available to help you.

If you are in immediate danger, call triple zero (000) and follow the advice from the police. If you are on campus and feel unsafe, contact triple zero (000) and notify Campus Security on (03) 9479 2222.

Students seeking specialised assistance can contact our Wellbeing Services team on (03) 9479 8988 or find support service on the Health, Wellbeing and Inclusion Hub.

Additional support services include:

LA TROBE OUT OF HOURS

Crisis Line: call 1300 146 307
or text 0488 884 100

LIFELINE

(24/7) telephone counselling
13 11 14

SUICIDE LINE VICTORIA

(24/7) telephone counselling
1300 651 251

Further emergency contacts can be found at the University’s **Counselling and Emergency Support** webpage.

Reporting concerns

If you observe or have concerns about modern slavery within the University’s operations or supply chains, please submit a confidential report using the University’s **Modern Slavery Reporting Tool**.

2. ABOUT LA TROBE UNIVERSITY

La Trobe University (“the University”) is a public higher education institution established in 1964 with a founding mission to serve communities through greater access to higher education. The University delivers education, research and related services across multiple campuses in Victoria, including metropolitan and regional locations.

The University’s purpose and scale are underpinned by a strong commitment to environmental, social and governance (ESG) principles, including responsible institutional practices, ethical conduct and positive social impact. This commitment is reflected in the University’s external performance and benchmarking against global sustainability and social impact measures.

Our Rankings



In 2025, La Trobe University was ranked:

- 217th globally in the QS World University Rankings 2025 (out of more than 1,500 ranked institutions)¹
- 145th globally in the QS World University Rankings: Sustainability 2025²
- first in Australia and fifth globally for United Nations Sustainable Development Goal (SDG) 2 – Zero Hunger

- within the top 50 globally for Good Health and Wellbeing (SDG 3) and Gender Equality (SDG 5) in the Times Higher Education (THE) Impact Rankings 2025.

These rankings provide important context for the University’s broader approach to social responsibility, ethical conduct and risk management, including its modern slavery risks within its operations and supply chains.

The University’s **Research Impact Strategy 2023–2025** further aligns with key United Nations Sustainable Development Goals through five priority areas:

- sustainable food and agriculture
- resilient environments and communities
- healthy people, families and communities
- understanding and preventing disease
- social change and equity.

In 2025, the University also released its refreshed Strategic Plan 2025–2030, which sets the strategic direction for research, education and community engagement. The Plan includes a strong focus on:

- research excellence and innovation
- student experience and employability
- safe and inclusive campuses
- Indigenous and community engagement
- extending the University’s impact through philanthropy.

Together, these frameworks support the University’s integrated approach to ESG, reinforcing governance structures and decision-making processes that underpin ethical operations and the management of modern slavery risks across the University’s activities and supply chains.

Our research

In 2025, the University’s research community delivered strong outcomes, securing competitive funding across the Australian Research Council, health and medical research schemes. The University also launched major new initiatives, including the \$129 million Care Economy Cooperative Research Centre and two ARC Industrial Transformation Research Hubs.

These initiatives contribute to building national capability and translating research excellence into practical real-world outcomes, supporting the University’s broader commitment to social impact, ethical practice and responsible engagement across its research activities and partnerships.

¹ QS World University Rankings 2025. This ranking is included for contextual information only and does not form part of the University’s modern slavery risk assessment.

² QS World University Rankings: Sustainability 2025. This ranking is included for contextual information only and does not form part of the University’s modern slavery risk assessment

3. THE UNIVERSITY'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

3.1 STRUCTURE

The University is a statutory body corporate, established under the *La Trobe University Act 2009* (Vic). The University is governed by the University Council, which is responsible for oversight of the University's governance, strategic direction, financial sustainability and risk management.

The University Council is chaired by the Chancellor, and is supported by a number of standing committees including:

- Corporate Governance, Risk Internal Audit and Safety Committee
- Finance and Resources Committee
- Foundation Committee
- People and Culture Committee
- Estates Development and Infrastructure Committee
- Remuneration and Nominations Committee
- Academic Board.

External review of Council

In 2025, La Trobe University Council underwent an external review conducted by an independent reviewer, with the final report provided to Council in September 2025. The review examined the performance and effectiveness of Council, its sub-committees and individual members, including Council's fulfilment of its obligations, powers and responsibilities under the *La Trobe University Act 2009*

(VIC) and other relevant legislation. The scope of the review also included Council's compliance with the requirements of the Higher Education Standards Framework.

Council's composition includes the Chancellor (Chair), the Vice-Chancellor, the Chair of Academic Board, members appointed through government and Council processes and elected staff and student members.

Chancellor

The Chancellor chairs Council and provides leadership to Council in carrying out its functions under the *La Trobe University Act 2009* (VIC). The Chancellor also supports effective Council governance, including chairing meetings and facilitating Council's formal communications with the Vice-Chancellor.

Vice-Chancellor

The Vice-Chancellor is the University's chief executive officer and is responsible for the leadership and management of the University's academic, operational and external affairs, including implementing the University's strategic objectives.

Academic governance

Academic governance is led through the Academic Board which is supported by committees responsible for education quality, coursework and research governance. The Academic Board committee structure includes:

- Academic Executive Committee
- Education Committee
- Coursework Committee
- Research and Graduate Studies Committee.

Academic governance is also supported by specialist committees that oversee research integrity and ethics, higher degrees and biosafety, including:

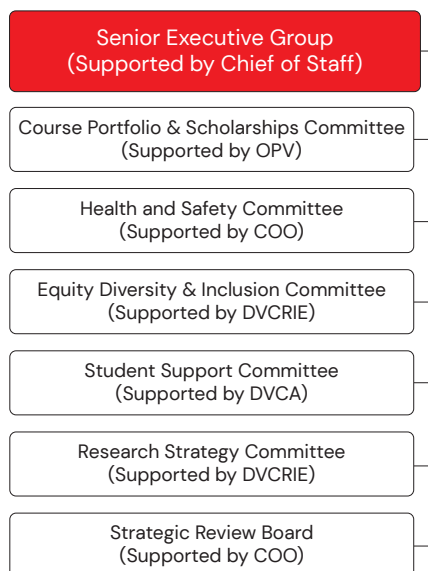
- Board of Graduate Research
- Higher Doctorates Committee
- Human Ethics Research Committee
- Animal Ethics Committee
- La Trobe Institutional Biosafety Committee.

External review of the Academic Board

An external review of the Academic Board was conducted in 2025 and reported to Council at its December 2025 meeting. The review assessed the Board's compliance with the Higher Education Standards Framework, with a particular focus on Standard 6.3 (Academic Governance), and considered whether the Academic Board was effectively meeting its responsibilities under the Academic Board Statute 2009 and its approved terms of reference.

Senior executive structure

The University's senior executive structure supports delivery of the University's operations and management of key enterprise risks. Key portfolios include:



Senior Executive Group composition

- Vice-Chancellor (Chair)
- Provost and Senior Vice President
- Deputy Provost
- Deputy Vice-Chancellor Research and Innovation (Research and Industry Engagement)
- Deputy Vice-Chancellor and Vice President (Academic)
- Deputy Vice-Chancellor and Vice President (Future Growth)
- Pro Vice-Chancellor (Regional)
- Pro Vice-Chancellor (Indigenous)
- Chief Operating Officer and Vice President (Operations)

University schools

The University has 12 schools under the Provost's portfolio:

- La Trobe Business School
- La Trobe Law School
- La Trobe Rural Health School
- School of Agriculture, Biomedicine and Environment
- School of Allied Health, Human Services and Sport
- School of Applied Systems Biology
- School of Cancer Medicine
- School of Computing, Engineering and Mathematical Sciences
- School of Education
- School of Humanities and Social Sciences
- School of Nursing and Midwifery
- School of Psychology and Public Health.

View the University's **Annual Report** for further information on the University's structure.

University entities

In 2025, La Trobe University (ABN 64 804 735 113) owns two entities:

- LTU Services Ltd (ABN 62 642 748 463). Established in late-2020 for education services, this entity has not operated and holds no assets or revenue for the purposes of this Statement.
- La Trobe Ltd (ABN 78 618 827 615). Previously known as Unitemps, this entity was impacted by COVID-19 when its franchisor, Warwick University (UK) decided to withdraw from Australia during the FY 2020. As a result, the Franchise Agreement was mutually terminated on 30 September 2020, and La Trobe Ltd ceased its operations in Victoria. Since then, the entity has remained dormant.





3.2 OPERATIONS

The University's operations include teaching and learning activities, research activity, student services, campus operations and facilities management, and corporate services that support these functions.

The University's core activities are teaching and research and aims to support our community's:

- economic prosperity
- wellbeing
- progress towards gender equality
- recognition and acceptance of different cultures
- environmental sustainability.

Our campuses

The University operates independently within Australia and has seven campuses:

1. **Melbourne (Bundoora) Campus:** the main and largest campus serving Melbourne's north.
2. **Albury-Wodonga:** located on the border of Victoria and New South Wales, the spacious campus features modern facilities utilised by our local partners.
3. **Bendigo:** a distributed presence with four sites throughout the city complementing the main campus enabling a true integrated industry approach.
4. **Mildura:** contributes to the local education ecosystem through our upgraded industry-standard teaching and research facilities.
5. **Shepparton:** the recently completed AU\$20m campus redevelopment doubles our footprint and further embeds us into community.
6. **City Campus (Collins Street, Melbourne):** a smaller campus offering postgraduate and business courses.
7. **Sydney Campus:** operates under a third-party teaching contract arrangement with Navitas Ltd, who delivers pre-university English language and academic pathway programs, undergraduate and postgraduate degrees on behalf of the University.

KEY STATISTICS

Students

In 2025, the University had a total of 39,648 students (persons) (28,925 EFTSL) – representing an increase from 37,480 students in 2024 comprising:

- 9,919 international students (persons)
- 29,729 domestic students (persons).

Student placements³

- 21,350 placements undertaken in 2025
- 10,204 students had undertaken at least one placement in 2025.

Student satisfaction⁴

- 79.2% overall graduate satisfaction (Course Experience Questionnaire)
- 79.3% of graduates in full time employment (Graduate Outcomes Survey)
- 89.8% of overall graduate researchers satisfaction (Postgraduate Research Experience Questionnaire)
- 78.3% overall student satisfaction (Student Experience Survey).

³ This includes placements that were commenced as some are ongoing.

⁴ Data reported on is undergraduate only from the Quality Indicators for Learning and Teaching (QILT) Australian Government initiative that collects and publishes data on student experiences and graduate outcomes at universities and higher education institutions.

Staff

- 2986 staff (FTE)⁵
- 77.11% (2302.5) are full-time (an increase from 2024 figures of 2283)
- 22.9% (684.4) are part-time (an increase from 2024 figures of 544)
- 3.69% (110.4) are casual (a decrease from 2024 figures of 327)
- 54.4% (1744.3) are professional staff (incl. casuals) (an increase from 2024 figures of 1718)
- 44.7% (1353) are academic staff (incl. casuals) (an increase from 2024 figures of 1436).

The University respects all gender identities. We acknowledge the existing constraints with our data systems, which do not capture the full diversity of our university community. Enhancements continue on our systems and data practices to represent gender diversity. Presently our systems report the gender breakdown of staff (3,965 individuals) for 2025 as follows:

- 66.28% (2,628) are female
- 33.34% (1,322) are male
- 0.37% (15) are self-described.

Consolidated revenue

The University had a total consolidated revenue of \$1,001,500,000 – up from 2024's total consolidated revenue of \$915,990,000.



\$1,001.5M
CONSOLIDATED REVENUE



39,600
TOTAL STUDENTS
(PERSONS)



7
CAMPUSES

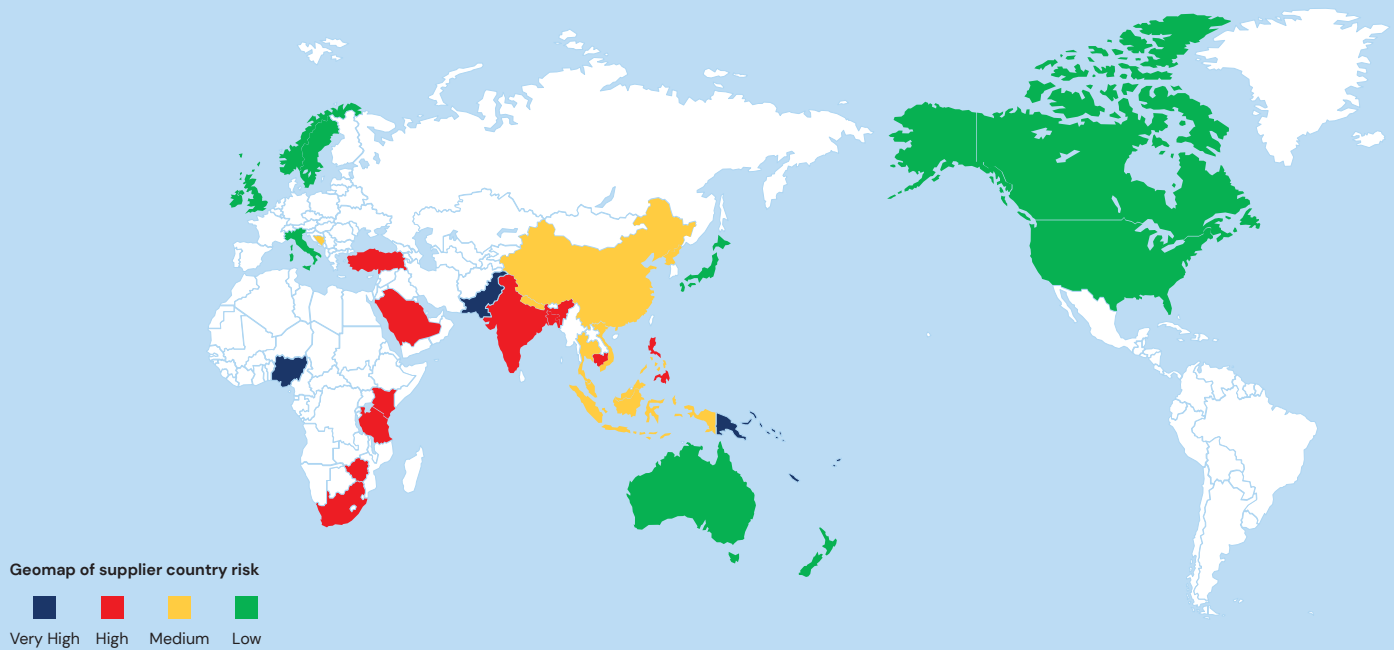


2,900
STAFF (FTE)



3,200
ACTIVE VENDORS

⁵ The total headcount represents the unique number of staff members. Some individuals hold both casual and continuing/fixed-term roles meaning the sum of category-specific headcounts may exceed the total headcount.



3.3 SUPPLY CHAINS

The University's supply chains typically include procurement of goods and services across areas such as information technology, facilities and maintenance, construction and refurbishment, cleaning and security, laboratory and research supplies and equipment, professional and consultancy services, travel and accommodation, fleet and logistics, marketing and communications, and catering and events.

The University engages suppliers through a mix of direct sourcing and sector or government-enabled purchasing arrangements, depending on the category and risk profile.

The University engages with a broad network of external suppliers, working with over 3,200 active vendors in 2025 – an increase of 100 vendors from the 3,100 recorded in 2024.

The University is committed to responsible procurement practices, ensuring suppliers align with ethical standards. The majority of first-tier suppliers are Australian-based companies. However, risks of modern slavery are more prevalent in the second, third and fourth tiers of our supply chain, where transparency is often limited. These risks are particularly significant in manufactured goods, including components and materials used in:

- computer equipment and mobile phones
- vehicles
- solar energy panels
- laboratory supplies
- clothing and uniforms
- cleaning agents
- construction materials.

To promote ethical procurement across the sector, the University participates in the Australian University Procurement Network (AUPN), a strategic initiative led by Higher Ed Services, a non-for-profit organisation owned by Universities Australia. This collaboration strengthens procurement capabilities within Australian universities, fostering responsible and sustainable supply chain practices.

In 2025, a collaboration of forty-one universities, through the AUPN, continued their collective effort to identify modern slavery risks within their supply chains. The University uploaded spend data into the AUPN Anti-Slavery Supplier Risk dashboard to analyse country, category, spend and our overall risk (noting that this data does not include corporate card and non-procurement spend)⁶.

Analysis of University spend (corporate card and non-procurement spend is excluded)

In 2025, the University expended \$357M, engaging a total of over 3,200 unique suppliers:

- \$330M (92.4%) of this spend was with first-tier Australian suppliers
- \$27M (7.6%) of this spend was with first tier international suppliers.

⁶ Category Spend and Overall Risk Ratings used in the AUPN anti-Slavery Supplier Risk Dashboard are sourced from the 2023 Global Slavery Index; the ACAN (Australian Catholic Anti-Slavery Network); the RESPECT (Responsible and Ethical Private Sector Coalition against Trafficking); and the NSW Anti-Slavery Commissioner GRS Inherent Risk Identification Tool.

Overall supplier risk

- \$5.32M (1.5%) of total spend was with 87 international suppliers in high and very high-risk countries⁷ – an increase from 2024 spend of \$4.9M with 93 international suppliers in high-risk countries.
- The majority (82.3%) of expenditure with high and very high-risk countries relates to student recruitment payments. The University manages this expenditure in accordance with its **Education Agent Management Policy**, which ensures compliance with all relevant legislation, regulations and standards. Contracts are subject to audit and re-reviewed at renewal at the end of their two-year term to support ongoing compliance with legislative requirements and University Policy.
- \$942,470 (17.7%) of the remaining very high and high-risk category spend was predominantly spread across travel and event management, IT software/ subscriptions, research, marketing materials, media and advertising and administration costs.

7 Country risk ratings used in the AUPN Anti-Slavery Risk Dashboard are sourced from the **Walkfree Global Slavery Index/downloads**

8 Categories are risk rated based on information from numerous modern slavery websites and internal ArcBlue IP gathered over time. Key websites include Global Slavery Index (Walkfree Foundation); RESPECT (Responsible and Ethical Private Sector Coalition against Trafficking); ACAN (Australian Catholic Anti-Slavery Network); Guidance on Reasonable Steps to manage modern Slavery risk (NSW Anti-Slavery Commissioner).

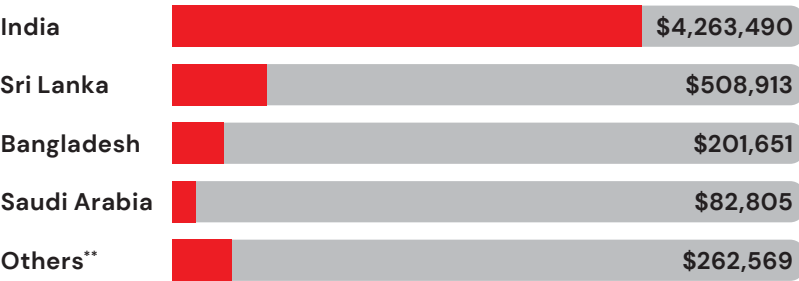
****Other countries include:** Philippines, Cambodia, South Africa, Kenya, Colombia, Pakistan, Türkiye, Uganda and Uzbekistan.

BREAKDOWN OF TIER 1 VERY HIGH AND HIGH-RISK COUNTRIES AND CATEGORIES⁸

HIGH-RISK SUPPLIER NUMBERS

VERY HIGH-RISK COUNTRIES	CATEGORY OF GOODS AND SERVICES	NO. OF SUPPLIERS
Pakistan	- student agency	1
Papua New Guinea	- research support	1
HIGH-RISK COUNTRIES		
India	- student/recruitment services - travel agency, airfare, accommodation, taxi and ride share services - event management - couriers - marketing materials - advertising services	45
Sri Lanka	- student recruitment - software as a service	17
Philippines	- student/recruitment services - scientific equipment	5
OTHER HIGH-RISK COUNTRIES		
Bangladesh, Cambodia, Colombia, Kenya, Saudi Arabia; South Africa, Türkiye, Uganda, Uzbekistan	- student/recruitment services - research support - grants	17

HIGH-RISK COUNTRY SPEND



4. THE RISKS OF MODERN SLAVERY PRACTICES IN THE UNIVERSITY'S OPERATIONS AND SUPPLY CHAINS

There are two primary areas of modern slavery risk within the University's operations:

- 1 OUR PEOPLE
- 2 OUR OPERATIONS AND SUPPLY CHAINS.

OUR PEOPLE

Staff engagement and due diligence in recruitment

The University is committed to promoting positive change and addressing key societal challenges through a culture of connection, inclusion and excellence. As part of this commitment, the University implements robust due diligence in its recruitment and employment practices to support ethical, transparent and legally compliant hiring processes and to mitigate the risk of labour exploitation and modern slavery.

The University's recruitment framework applies across a broad range of roles (across both academic and professional positions) and is managed by an internal recruitment team. Where required, recruitment activities may also involve reputable third-party agencies for permanent, fixed-term, continuing, casual and contingent labour arrangements.

To promote integrity, fairness and compliance, all vacancies are advertised through the University's official **Jobs at La Trobe** platform and other reputable job portals, and a structured selection process is followed, including application screening, shortlisting, interviews and offers of employment, in accordance with applicable employment laws and standards. All staff are employed under the **La Trobe University Enterprise Agreement 2023**, which came into effect on 8 January 2024 and provides a framework for job security, stability and fair working conditions.

To further mitigate the risk of modern slavery and labour exploitation, the University undertakes due diligence measures including:

- reference checks for all staff, including those engaged through third-party agencies
- ensuring employment contracts comply with relevant labour laws and Enterprise Agreement requirements
- partnering with recruitment agencies that demonstrate ethical recruitment practices and responsible workforce management
- providing training and awareness initiatives to staff on fair employment

practices and workers' rights as part of its broader people management, governance and compliance frameworks.

These initiatives are delivered through induction processes, policy-based guidance, role-specific training and ongoing communications, and are designed to support understanding of lawful employment practices, ethical recruitment and the identification of potential labour exploitation risks.

The University recognises that its staff and student community is diverse and that certain cohorts may be more vulnerable to exploitation. In particular, international students, often young and new to Australia, may face heightened risks during their initial period of adjustment to unfamiliar employment laws, cultural norms and workplace practices. These factors inform the University's ongoing approach to recruitment due diligence, staff engagement and risk awareness as part of its broader efforts to prevent exploitation and modern slavery within its operations.

International students

La Trobe University recognises that international students may face heightened exposure to modern slavery risks, particularly in relation to recruitment practices and working in the Australian labour market. These risks can include

deceptive recruitment, coercion, debt bondage and underpayment, especially where students rely on third-party intermediaries or engage in low-income or insecure work.

The University maintains (recruitment) controls consistent with the **Education Services for Overseas Students Act 2000 (ESOS Act)** and the **National Code of Practice for Providers of Education to Overseas Students 2018**. The **Education Agent Management Policy** establishes due diligence, monitoring and accountability mechanisms, including biannual performance reviews that consider both commercial outcomes and ethical conduct. Allegations of agent misconduct, including by sub-contractors, are escalated promptly for investigation, with risk mitigation actions implemented as required.

The University has established processes to monitor and mitigate the risk of exploitation within the student visa and partner visa programs in relation to modern slavery. This is an ongoing, iterative process aimed at identifying risks early and reducing the potential for exploitation offshore, prior to individuals arriving in Australia.

Once enrolled, international students are provided with information and support designed to reduce their vulnerability to

exploitation. Orientation and ongoing communications includes guidance on workplace rights, safe living practices, and access to legal, health and emergency services. Resources such as the **Living in Australia** website and webinar series provide practical information on employment conditions, tenancy rights, financial management and navigating Australian systems.

The University acknowledges that many international students seek employment in industries with known higher risks of labour exploitation, including cleaning, hospitality, food production and construction. To mitigate these risks, the University provides targeted information through its **International Students and Work Rights in Australia** platform. This includes guidance on lawful working hours, minimum employment standards, and avenues for support, including referral to the Fair Work Ombudsman. Career support services are also available to assist students in securing legitimate employment and understanding employer expectations.

Through these measures – focused on responsible recruitment, regulatory compliance, risk monitoring and student education – the University seeks to reduce the risk of modern slavery practices affecting international students within its operations and value chain.

Wellbeing services

The University provides a range of wellbeing and support services that contributes to the identification and response to potential modern slavery situations. These services are accessible to international students through multiple pathways, including self-referral and referral by staff (with student consent), ensuring that barriers to support are minimised.

Wellbeing Services website operates as a central access point for student support, offering confidential assistance for a wide range of issues that may intersect with vulnerability to exploitation. This includes mental health concerns, financial stress, legal issues and broader wellbeing needs. Where indicators of modern slavery are identified, trained counsellors and case managers provide trauma-informed support, assist students to access safety, and facilitate referrals to appropriate external authorities where appropriate and with the student's consent.

Specialised case management support is available through programs such as **Student Wellbeing Connect**, alongside dedicated roles focused on the needs of international students. An after-hours crisis service further ensures that support is available outside standard operating times.



Wellbeing Services works in coordination with **Safer Community**, which provides confidential advice and intervention in cases involving harmful or threatening behaviour, including violence, coercion, harassment or exploitation. With consent, information sharing between these services supports a coordinated response to student safety concerns.

Additional support services including specialist advising, accessibility services and dedicated safe spaces are also available, enabling a holistic response to student wellbeing and safety.

Collectively, these services form part of the University's approach to identifying, responding to and mitigating modern slavery risks, ensuring students have access to appropriate support and pathways to assistance if they experience or are at risk of exploitation.

OUR OPERATIONS AND SUPPLY CHAINS

The University operates within a complex and diverse supplier network, engaging with over 3200 vendors that supply goods and services to support academic, research and campus operations. Within these operations and supply chains, there is a risk that modern slavery practices may occur, particularly within extended supply chains beyond direct suppliers.

These risks are heightened in industries and regions where there are known human rights concerns, weak regulatory environments and a reliance on low-skilled or vulnerable labour. The University recognises that the modern slavery risks are often less prevalent in tier 1 suppliers and more prevalent in deeper tiers of the supply chain.

Identifying and assessing supply chain risk remains complex. In 2025, the University continued to utilise a range of tools and resources to strengthen its risk identification and due diligence processes including:

- **AUPN Modern Slavery Risk Rating Tool**
- **NSW Anti-Slavery Commissioner's Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply Chains**
- **OECD Due Diligence Guidance for Responsible Business Conduct**
- **Australian Border Force Register of Sanctioned Sponsors**
- **USA Uyghur Forced Labor Prevention Act (UFLPA) Entity List**
- **(US Dept of Labor) Lists of Goods Produced by Child Labor or Forced Labor and List of Goods (Excel).**

The University acknowledges that some goods and services procured may originate from supply chains where modern slavery risks exist, particularly in the sourcing of raw materials or manufacturing processes. Risk assessments consider both the nature of the goods and services procured and the geographic locations in which they are produced.

The University also recognises that modern slavery risks may arise within its broader operations, including research activities. This may occur through the procurement of latex gloves, lab consumables, the conduct of research projects and international research collaborations. The University remains committed to strengthening its understanding of these risks and embedding appropriate controls to support ethical and responsible practices.





Promoting use of pre-qualified contracted suppliers

The University prioritises engagement with contracted and pre-qualified suppliers to support ethical procurement outcomes and strengthen oversight of modern slavery risks. These suppliers are assessed against the University's ethical, social and governance requirements, and their use is embedded in procurement practice through the Procurement Policy and Procedure. Staff are expected to engage contracted suppliers wherever practicable to promote consistency, accountability and a risk-based approach to purchasing.

As part of the supplier onboarding process, pre-qualified suppliers are made aware of the University's expectations in relation to modern slavery. This includes guidance on recognising potential indicators of modern slavery within their operations and supply chains, as well as information on escalation and reporting mechanisms should concerns be identified.

Suppliers are expected to apply comparable standards across their own business activities and supply chains. This includes conducting appropriate due diligence, actively managing identified risks and implementing measures to prevent and address modern slavery. Where relevant, suppliers may be asked to demonstrate how they identify risks, monitor supplier performance and drive ongoing improvement in their modern slavery risk management practices.

Modern slavery considerations in supplier tendering

Modern slavery considerations are embedded within the university's sourcing and tendering processes. Procurement activities incorporate risk-based approaches, including mandatory responsible procurement questionnaires and evaluation criteria designed to assess supplier capability and maturity in managing modern slavery risks.

Tender processes require suppliers to demonstrate:

- modern slavery policies, governance frameworks and supply chain transparency
- risk identification and mitigation practices within their supply chains
- training programs or resources provided to employees and subcontractors.

This approach supports more informed procurement decisions and strengthens the University's ability to identify and manage modern slavery risks at the point of sourcing.

Raising concerns of suspected modern slavery

The University maintains a **Modern Slavery Reporting tool**, accessible via the University's **Modern Slavery Statement** page and **Doing Business with La Trobe** pages enabling internal and external stakeholders to confidentially report suspected modern slavery within the University's operations or supply chains.

If a report were submitted, it is managed in accordance with the University's governance and compliance frameworks. The Executive Director, Procurement & Business Services would initiate an appropriate investigation process which may include:

- engaging with the relevant supplier or stakeholder
- assessing the nature and severity of the risk
- requiring corrective actions to address identified issues and protect affected individuals.

All actions and outcomes are documented and reported through established governance channels, including the Senior Executive Group and the Corporate Governance, Risk, Internal Audit and Safety Committee.

The University is committed to ensuring that concerns are addressed appropriately and that affected individuals are supported through access to relevant grievance and remediation mechanisms.

5. ADDRESSING MODERN SLAVERY

5.1 PRIOR ACTIONS AND ONGOING COMMITMENT

Since the enactment of the *Modern Slavery Act 2018 (Cth)*, the University has taken a structured and risk-based approach to identifying and addressing modern slavery risks across its operations and supply chains. These include strengthened governance and policy frameworks, enhancing supplier/vendor onboarding and due diligence processes, and embedding modern slavery considerations into procurement practices and contractual arrangements.

The University sets clear expectations that suppliers operate in a manner consistent with these standards and actively manage modern slavery risks within their own operations and supply chains, in line with applicable legislation.

Through active participation in sector-wide initiatives, the University continues to assess high-risk expenditure across categories and geographies to strengthen its due diligence, supplier engagement and risk management practices.

5.2 ACTIONS TAKEN IN 2025

Reports of modern slavery

No formal reports of suspected modern slavery were received by our Executive Director, Procurement and Business Services during 2025 in relation to the University's operations or supply chains. Notwithstanding this, the University's Strategic Procurement and Procurement Operations teams continues to proactively identify and assess modern slavery risks across supplier relationships.

Ongoing activities include:

- regular assessments of new suppliers for modern slavery risks
- monthly cross-checks of suppliers against the **Australian Border Force Register of Sanctioned Sponsors**
- desktop audits to verify suppliers' modern slavery policies, procedures and actions to identify and address modern slavery within their supply chains. These reviews also consider evidence of modern slavery training and awareness as well as broader compliance indicators such as sustainability certifications, working with children checks, insurances coverage and progress against net zero commitments.

Migrant Justice Institute survey

- In 2024, the Migrant Justice Institute, in partnership with community organisations, conducted a national survey of international students and other migrant workers in Australia.
- La Trobe University was one of 18 Australian universities to receive more than 150 student responses, with 217 respondents identifying La Trobe University as their current education provider). The University received an individual institutional report in early 2025 to support local analysis and planning. As planning for 2025 had already been finalised, these findings will inform the University's 2026 planning for student support and risk identification measures.
- A sector-wide report will be provided to all University Anti-Slavery Program members in early 2026 enabling collective interpretation and coordination. These insights will support the University Anti-Slavery Program development of an evidence-based, sector-wide response throughout 2026.

Supplier relationship management

The University engages regularly with key internal and external stakeholders to promote transparency and identify potential modern slavery risks within supply chains. These engagements support increased supplier awareness, improved disclosure of modern slavery practices, and stronger alignment with the University's expectations.

The University actively participates in collaborative sector initiatives to address modern slavery risks through the AUPN. This collaboration supports the development of shared tools, consistent expectations and coordinated supplier engagement, contributing to improved risk identification and more effective due diligence across the sector as universities often use the same suppliers.



Strategic procurement

In 2025:

- all Strategic Procurement and Procurement Operations team members completed either the **Educating for Change: Modern Slavery in University Settings; or the Introduction to Modern Slavery** microcredentials, strengthening capability to identify and manage modern slavery risks
- team members actively participated in the AUPN Modern Slavery Working Group and Modern Slavery Risk Groups, contributing to sector-wide initiatives and the development of shared approaches to risk identification and supplier engagement
- ongoing modern slavery risk assessments for new vendors as part of the supplier onboarding process supporting early identification of higher-risk suppliers and informing due diligence activities
- Strategic Procurement undertakes supplier due diligence through a responsible procurement questionnaire that form part of the tender evaluation process. This questionnaire is incorporated as non-price criteria and require suppliers to disclose information on modern slavery policies, labour practices, supplier chain governance and measures to identify and address modern slavery risks in their supply chains. Supplier responses are assessed as part of the overall evaluation to ensure responsible sourcing considerations are embedded in procurement decision-making.

Policy, procedure and guidelines

The University maintains and regularly reviews its policies, procedures and guidelines to support a zero-tolerance approach to modern slavery and uphold human rights across its operations. These frameworks establish clear expectations for behaviour, safeguard vulnerable individuals, and provide accessible pathways for reporting and addressing concerns.

Key policies that support the identification, prevention and reporting of modern slavery risks include:

- **Public Interest (Whistleblower) Disclosure Policy**
- **Equity, Diversity and Inclusion (Staff) Policy**
- **Gender Equity Policy**
- **Student Charter**
- **Student Behaviours Policy**
- **Workplace Behaviours Policy**
- **Sexual Harm Prevention and Response Policy**
- **Sexual Harm Prevention and Response Procedure – DFAT Funded Program and Activities**
- **Working with Children Policy**
- **Child Safety and Wellbeing Policy**
- **Code of Conduct**
- **Education Agent Management Policy.**

These policies collectively support worker protections, promote safe and respectful environments, and enable the escalation of suspected misconduct, including potential modern slavery risks. Policy expectations are communicated through induction, training and ongoing communication channels. The University Policy Library is the authoritative source for all policy documents and is publicly accessible to all staff, students and external stakeholders including suppliers.

La Trobe humanitarian scholarships

La Trobe University remains committed to supporting individuals from refugee and asylum seeker backgrounds and values the significant contributions they make to the Australian community.

In 2023, the Commonwealth Government amended HECS-HELP criteria to extend access to certain students previously excluded. The introduction of the Resolution of Status (ROS) Visa now allows eligible students to apply for a Commonwealth Supported Place (CSP) and access HECS-HELP. However, students on bridging visas remain ineligible for this Commonwealth support.

Taking these changes into account, La Trobe University renewed the Humanitarian Scholarships program in 2024 for four years, through to 2028, with the following structure:

- two full-fee waiver scholarships with a \$5,000 annual stipend, available for students on eligible bridging visas or temporary humanitarian concern visas
- three stipend-only scholarships of \$5,000 annually, available for students holding a Resolution of Status (ROS) Visa.

These scholarships are designed to provide targeted financial support to students commencing undergraduate studies and assist with financial barriers experienced by individuals from refugee and asylum seeker backgrounds.

La Trobe University is proud to champion access to education and equity for all students, regardless of their circumstances.

5.3 COLLABORATIVE INITIATIVES

Australian Universities Procurement Network (AUPN) Anti-Slavery Program

The AUPN continued to be a valuable sector-wide resource for the University throughout 2025. The AUPN's Anti-Slavery program is designed to reduce duplication of costs and resourcing across the university sector by enabling institutions to collaborate, share tools and leverage collective expertise, rather than operating independently in isolation.

The University's Procurement team remains actively engaged with AUPN. The Executive Director Procurement and Business Services serves as Co-Chair of the AUPN, supporting strategic leadership across the network. In addition, the University's Procurement Process and Projects Advisor participates in the Modern Slavery Working Group attending forum sessions.

The AUPN Anti-Slavery forum conducted a university sector risk assessment approach, based on the United Nations' Guiding Principles on Business and Human Rights, in order to understand where the sector could have the biggest influence to leverage meaningful impact. Three areas were identified:

- medical equipment and laboratory supplies in our supply chains
- electronics in our supply chains
- international student risk in our operations.

New university supplier anti-slavery toolkit

- Building on the work of the Supplier Risk Working Group undertaken in 2024, and informed by insights from this pilot, the Supplier Risk Working Group approached five suppliers identified as presenting higher risk within the medical and laboratory consumables category to pilot targeted remediation plans. In 2025, a university supplier anti-slavery tool kit was developed, outlining six practical actions suppliers can implement to strengthen their modern slavery awareness and improve risk management practices.
- Subject to approval by the AUPN, the University aims to utilise this toolkit in 2026 to support our suppliers in identifying, managing and mitigating modern slavery risks within their supply chains.



Electronics Watch Pilot

- Consistent with the intent of the *Modern Slavery Act 2018* and the Australian Government's guidance documentation, which encourages partnerships with expert NGOs and industry peers where entities lack direct leverage deep in supply chains, AUPN funded a one-year pilot with Electronics Watch in 2025 through the AUPN Anti Slavery Group. The pilot, which was supported by all Australian universities, recognised that electronics and ICT products are a globally recognised high risk category for modern slavery, due to complex, multi tier supply chains and known risks associated with raw material extraction, component manufacturing and assembly.
- Electronics Watch is an independent, non profit organisation that works with public sector buyers and civil society organisations to improve labour rights in global electronics supply chains through worker centred monitoring, independent factory investigations and buyer

collaboration. Electronics Watch is widely regarded as leading practice for addressing modern slavery risks in electronics supply chain. The AUPN funded pilot enabled a coordinated, sector-wide approach, reducing duplication of effort while increasing collective leverage across participating universities.

- Through the pilot, Strategic Procurement worked with Information Services (IS) – Digital Workspace who selected three high-spend ICT products for deeper supply chain analysis. Participation in the Electronics Watch pilot improved the University's visibility beyond tier-one suppliers, supported more informed modern slavery risk assessment and strengthened the University's approach to assessing the effectiveness of actions taken.
- Universities piloted a coordinated sector-wide engagement model to address identified issues in our electronics supply chain, which was the first global trial of its kind with Electronics Watch. Results included:

International student risk in our operations: international student risk roundtable

- A roundtable was held at the University of Sydney in 2025 with 11 universities and key external stakeholders including Migrant Justice Institute Australian Red Cross, Fair Futures, the Australian Federal Police and the NSW Anti-Slavery Commissioner to discuss modern slavery risks across the international student pathway, from recruitment and contracting through to post-arrival vulnerabilities.
- Key outcomes included agreement to develop sector-wide guidance for executive endorsement by 2026, recognition that risks to international students falls within Universities' direct responsibility under the *Modern Slavery Act 2018* and identification of persistent barriers such as limited executive sponsorship, underresourcing and reputational sensitivities. The roundtable established a strong foundation for ongoing sector collaboration and nationally consistent approaches to modern slavery risk management across the university sector.

METRIC	RESULT
Universities participating	22
Products submitted	81
Total spend	\$21.3m*
Tier 1 supplier identified	66
Factories mapped	27
Countries represented	Bolivia, China, Taiwan, India, Malaysia, Vietnam, Thailand
Common risk themes	Result: legal wages, occupational health and safety; discrimination in hiring and occupation; excessive working hours; forced labour, recruitment and employment conditions
Universities that received an initial risk assessment report	18
Remediation underway	13 cases under remediation via EW (EW to action on behalf of the universities – no university action required)
University engagement Q2 2025	2 cases requiring university engagement

*20 universities' data only was used across 3 products

University staff capability uplift

- A core pillar of the AUPN Anti-Slavery Working group is to ensure that university staff remain informed, skilled and equipped with current knowledge. AUPN initiatives include ongoing professional development and engagement with evolving best practices in the field.
- 2025 AUPN Anti-Slavery Working Group presentations included:
 - Monash University's Approach to Ethical Apparel Procurement (Richard Ellis, Monash University)
 - How Etiko Embeds Sustainability in Supply Chains (Nick Savaidis, Etiko)
 - Building a Practical Supplier Due Diligence Framework for Universities (Kim Randle, Fair Supply)
 - What you Don't See: Understanding Modern Slavery through Lived Experience (Sherry Waniru, Survivor Connections)
 - Inside the Update: What's New with the Inherent Risk Identification Tool (IRIT) 2.0 (Lucy Forbes, Office of NSW Anti-Slavery Commissioner)
 - 2023 University Modern Slavery Statements – What's Working and What Needs Work (Dr Nga Pham, Monash Centre for Financial Studies)
 - Electronics Watch Pilot Update: Turning Insights into Action (Marison Bernal, Electronics Watch)
 - Universities Internal Modern Slavery Working Groups Approach (University Panel)
 - Anti-Slavery Ambassador Program (Dolores Huang, University of Sydney)
 - 2025 Program Recap & Student Risks (Esty Marcu, Modern Slavery Unit, University of Sydney).

5.4 NEXT STEPS

During 2026, the University aims to:

- launch a tiered education program using the **Educating for Change** microcredentials, a Government-funded collaboration between ACRATH (Australian Catholic Religious Against the Trafficking of Humans), Flinders University, the University of South Australia and the Attorney-General's Department
- introduce measurable KPIs to strengthen monitoring and accountability. This will include tracking modern slavery training completion rates, the number of high-risk procurements assessed, supplier engagement through tenders, and the numbers of contractor improvement plans implemented
- strengthen contractor and supplier onboarding processes by utilising the AUPN anti-slavery toolkits to build awareness of modern slavery risks within supply chains, including key warning signs and clear expectations for suppliers engaging with the University

- embed modern slavery considerations into procurement decision making processes. For high-risk categories this will include documented due diligence, supplier improvement plans and ongoing monitoring and follow up reviews
- expand student-facing awareness initiatives where appropriate and continue to support international students through work-rights education. This will include focus on student placements, employment, internships and accommodation.

Through the implementation of these initiatives, the Strategic Procurement team, in collaboration with key University stakeholders, will strengthen its commitment to responsible and ethical procurement practices, reduce the risk of modern slavery, and enhance the University's broader focus on social responsibility and sustainability.



6. HOW THE UNIVERSITY ASSESSES THE EFFECTIVENESS OF ITS ACTIONS

In 2025, the University assessed the effectiveness of its actions in addressing modern slavery through several key measures.

Regular monitoring and due diligence

- **The Strategic Procurement Team:** conducted monthly assessments of suppliers through monthly cross-checks of suppliers against Australian Border Force Register of Sanctioned Sponsors.
Assessment through the consistent application of scored responsible procurement criteria in supplier tenders. Supplier responses to responsible procurement questions are evaluated as part of the tender assessments, enabling Strategic Procurement to consider the quality and maturity of suppliers' approaches to managing modern slavery risks when making sourcing decisions.
- **The Asset Transformation Business Support Team:** conducted regular desktop audits to evaluate supplier's modern slavery policies, training and compliance measures through the University's Rapid Induction tool.
- **Data and risk analysis:** the University leverages sector-wide tools, including Sievo procurement analytics and the AUPN Anti-Slavery Dashboards to identify, analyse and monitor supply chain risks across categories

and geographies. These insights inform prioritisation of high-risk areas and targeted due diligence activities.

- **Supplier engagement:** the University embeds modern slavery requirements into procurement processes, including pre-qualification, tender evaluation and contract management. Suppliers are required to demonstrate supply chain transparency, outline risk management practices and provide evidence of training or support provided within their own supply chains. Ongoing engagement supports improved supplier maturity and risk mitigation over time.
- **Training and awareness:** Strategic Procurement and Procurement Operations staff, along with key stakeholders, complete modern slavery training to build capability in identifying and managing risks. Participation in the AUPN Modern Slavery Working Group and Modern Slavery Risk Group ensures alignment with emerging best practice and supports continuous improvement.
- **Student and staff engagement:** Insights from initiatives such as the Migrant Justice Institute's National Temporary Migrant Work Survey assists the University to assess emerging risks and trends affecting students in vulnerable employment situations and to inform future awareness initiatives. The effectiveness

of these actions is monitored through engagement with support services and accessible resources. The University's **International Students and Work Rights in Australia** website provides employment rights information, access to student wellbeing, and free legal support services to strengthen awareness and help-seeking pathways.

- **Free legal support services:** Insights from Wellbeing Services further informs the University's understanding of emerging risks and areas of vulnerability. In 2025, for Semester 1 2025, 30 percent seeking legal support were international students, and in Semester 2 2025, 56 percent were international students.
 - In 2025, out of the 256 unique students who utilised the University's free financial counselling service, 80 were international students.
 - These are some of the common issues that international students tell us they need assistance with, then they initially self-refer to Wellbeing Services. It should be noted that this may be the initial reason, but it is rare that students come to Wellbeing Services with a singular issue:
 - Work Development Permit Program
 - Emergency relief
 - Food assistance
 - Accommodation/housing support

- Budgeting
 - Cost of living
 - Fines and infringements
 - Student fees
 - Referrals to external support
 - Advocacy and negotiation with creditors.
- **Governance and reporting:** The University maintains effective mechanisms for reporting and managing modern slavery risks including the **Modern Slavery Reporting** tool, which enables internal and external stakeholders to confidentially raise concerns. Information on reporting pathways and investigation processes is publicly available via the **Doing Business with La Trobe** webpage under the 'Modern Slavery Governance and Compliance' section. University policies and frameworks reinforces a zero-tolerance approach and supports consistent escalation and management of modern slavery related issues.

University's Compliance Management Framework and Risk Management Strategy

The University's **Compliance Management Framework and Compliance Management Policy** supports a structured, risk-based approach to identifying and managing legal and regulatory obligations, and reinforces a culture of compliance across the University.

The University Council recognises compliance and risk management as fundamental to effective governance. Oversight of compliance and assurance activities is provided by the Corporate Governance, Risk, Internal Audit and Safety Committee (CGRIASC).

In line with the Compliance Management Policy, all suspected or actual compliance breaches

must be reported to the University Compliance Manager. Where suspected modern slavery is identified, the Executive Director, Procurement and Business Services ensures the matter, and any subsequent investigation findings, are formally reported in accordance with the University's compliance reporting requirements.

Assurance Group

The University Assurance Group is responsible for delivering key strategic and operational risk management programs.

Risk management is undertaken using a university adaptation of the Victorian Government Risk Management Framework and Australian and New Zealand Standard (AS/NZS ISO 31000:2018). Critical Incident Management and Business Continuity Management is undertaken in accordance with the Australian and New Zealand Standard for Business Continuity: Security and Resilience – Business Continuity Management Systems AS/NZS ISO 22301:2020 and the Australasian Inter-Service Incident Management System (AIIMS). Identification, assessment and progress on risk treatment is reported to management and CGRIASC at quarterly meetings.

Onboarding Infrastructure and Operations & Asset Transformation contractors

Proposed partners of Infrastructure and Operations (I&O) & Asset Transformation (AT) are required to provide comprehensive details within their quotation/ tender submission regarding the measures implemented by their organisation to eliminate modern slavery practices within both their operations and supply chain. This must include a formal policy or statement, which should be uploaded to the University's contractor management system,

Rapid. The AT Business Support Team evaluates these submissions against key criteria, including commitment, actions undertaken, training initiatives and risk assessments within the organisation.

I&O & AT remain committed to identifying and addressing modern slavery risks across its operations and supply chains, with strengthened oversight of external partners in alignment with International Organisation for Standardisation (ISO) standards. Recent internal discussions highlighted moderate risk maturity in procurement and developing maturity in labour hire and construction, with key risks including limited supplier risk scoring, potential indicators of coercion or intimidation, and inconsistent access to independent reporting pathways.

A procurement audit is scheduled by the AT Business Support Team to evaluate and score suppliers based on industry risk, labour practices and transparency, with findings to inform targeted remediation and improvement plans. Increased regulatory scrutiny has reinforced the need to ensure contractors understand and comply with requirements to report unlawful conduct, supported by clearer communication and defined evidence expectations for project teams. Planned improvements include implementing a formal supplier risk assessment framework, strengthening contract clauses, enhancing reporting mechanisms, and delivering targeted training, with effectiveness to be monitored through improved audit scores, increased reporting confidence, and demonstrated contractor compliance

These approaches support continuous improvement and helps the University to refine its responses to addressing modern slavery risks across its operations and supply chains over time.

7. THE PROCESS OF CONSULTATION WITH UNIVERSITY ENTITIES

The Finance team consulted with the Director and Company Secretary of LTU Services Ltd and La Trobe Ltd regarding the structure and status of the entity. Neither LTU Services Ltd nor La Trobe Ltd had any revenue or assets in 2025 and are not required to report under the *Modern Slavery Act 2018*.

8. OTHER RELEVANT INFORMATION

National Temporary Migrant Work Survey Results

Given the strong participation of current and former La Trobe University international students in the 2024 survey, the University received a tailored institutional report from the Migrant Justice Institute in May 2025 outlining key findings. A sector-wide report will be provided to University Anti-Slavery Program members in early-2026.

These insights will inform the University's 2026 and future initiatives, enhance support services for international students, and strengthen efforts to raise awareness of modern slavery and workplace exploitation.

9. APPROVAL

This Statement was approved by the University Council through an out-of-session process, finalised on 18 June 2026. Council also delegated authority to the Vice-Chancellor to sign the Statement.



Professor Theo Farrell
Vice-Chancellor and President
La Trobe University

Dated: 22 June 2026



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