

Modern Slavery Statement **2021**



Message from the Vice-Chancellor and President

Modern slavery involves either the exploitation of individuals or the deprivation of an individual's freedom through the use of coercion, threats or deception.

Unfortunately, we know that modern slavery remains prevalent around the world. However, because of the complexity of global supply chains, this crime is difficult for well-intentioned organisations to both detect and eradicate.

At The University of Queensland (UQ), we are committed to playing our role in eliminating all forms of modern slavery around the world – and particularly from our own operations and supply chains.

Last year, we made important strides with this goal by issuing our first Modern Slavery Statement.

In that 2020 Statement, we made three key commitments that outlined the approach we would adopt in eradicating modern slavery. Those three commitments involved:

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

In this, our second annual Modern Slavery Statement, I am pleased to report that we made important progress during 2021, in terms of establishing a better understanding of the risks of modern slavery occurring as a result of our activities – as well as strengthening the controls we have in place to detect and prevent modern slavery.

Among the many measures detailed in this Statement, the University continued to raise awareness of the issue and to build the capacity of staff to detect modern slavery through training programs.

We also established a new procurement platform that gives us greater visibility of activity across our supply chain. This platform is helping to embed supplier due diligence, risk assessment and awareness raising as part of the supplier identification and management process.



Through the year, we also began developing UQ's new Supplier Standards, which will set out our principles as a socially responsible organisation and the expectation that our suppliers will align with those standards in their own operations.

The Standards will be finalised in 2022 – along with a new Supplier and Contract Management Framework that can be applied consistently across the University.

As a recent signatory to the United Nations' Sustainable Development Goals (SDGs), UQ is now joining with other government bodies, businesses and organisations around the world to make a public commitment to addressing the world's most pressing social, economic and environmental challenges. The concerted effort being put into eliminating and preventing modern slavery in our operations and supply chain is another demonstration of that commitment.

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

Through their efforts, we are gaining greater confidence that UQ is both enriching the communities in which we're embedded – and also remaining true to our vision of 'knowledge leadership for a better world'.

Professor Deborah Terry AO
Vice-Chancellor and President

UQ's response to modern slavery – at a glance

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

It summarises the steps taken by UQ and its controlled entities to identify, mitigate and manage the risk of modern slavery in their operations and supply chains during the financial year ending 31 December 2021 (Reporting Period), and outlines the measures planned for subsequent reporting periods to continue to improve our¹ practices to combat modern slavery.

UQ is committed to ethical and responsible conduct in its operations and to improving the communities where we live and work. We respect the human rights of all our people and those we work alongside, in both our supply chain and the communities in which we operate. We seek to engage with partners who respect and uphold the human rights of others.

Following the publication of our first Statement in June 2021, we continue to build our knowledge about the potential for modern slavery risks in our operations and supply chain.

We welcome feedback and/or questions at modernslavery@uq.edu.au.

2021 Highlights

- Modern slavery risk assessment
- Capability building
- Source to contract platform
- Supplier due diligence
- Supplier Standards
- Strengthening our contract management framework
- Research partnerships
- Escalation pathways
- Policy framework



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

The University of Queensland

With three main campuses at St Lucia, Gatton and Herston and an extensive online and international presence, UQ is one of Australia’s leading teaching and research institutions.

We have been successfully providing tertiary-level education and promoting scholarship through study and research for more than a century, increasing our student cohort from 83 in 1911 to more than 56,000 in 2021, and graduating more than 307,000 – including 16,300 PhDs – in that time.

UQ consistently ranks among the world’s top universities as measured by several key independent rankings, including:

- U.S. News Best Global Universities Rankings (36)
- Performance Ranking of Scientific Papers for World Universities (38)
- CWTS Leiden Ranking (41)²
- QS World University Rankings (47)
- Academic Ranking of World Universities (51)
- Times Higher Education World University Rankings (54).

2021 saw a new strategic plan being drawn up for the University with a refreshed set of values to guide our behaviour:

<i>What we strive for:</i>	Creativity, Excellence
<i>Central to what we do:</i>	Truth
<i>How we work together:</i>	Integrity, Courage, Respect and Inclusivity

See our [website](#) for detailed information about our business, including our strategy and operations, as well as our approach to sustainability.

UQ's structure, operations and supply chain

In 2021, UQ's operating revenue was **\$2,385 million**

Governance and structure

Founded in 1910, UQ is governed by the University Senate, as constituted by the *University of Queensland Act 1998 (Qld)*.

Our mission is articulated in our [Strategic Plan](#), and our operations are determined by the [University of Queensland Act 1998](#), UQ Statutes, and [Senate](#) Rules. Effective governance is the enabling foundation for UQ's long-term success.

The University has controlled entities that further the University's educational and research aims, and are included as part of the consolidated result in our annual financial statements.

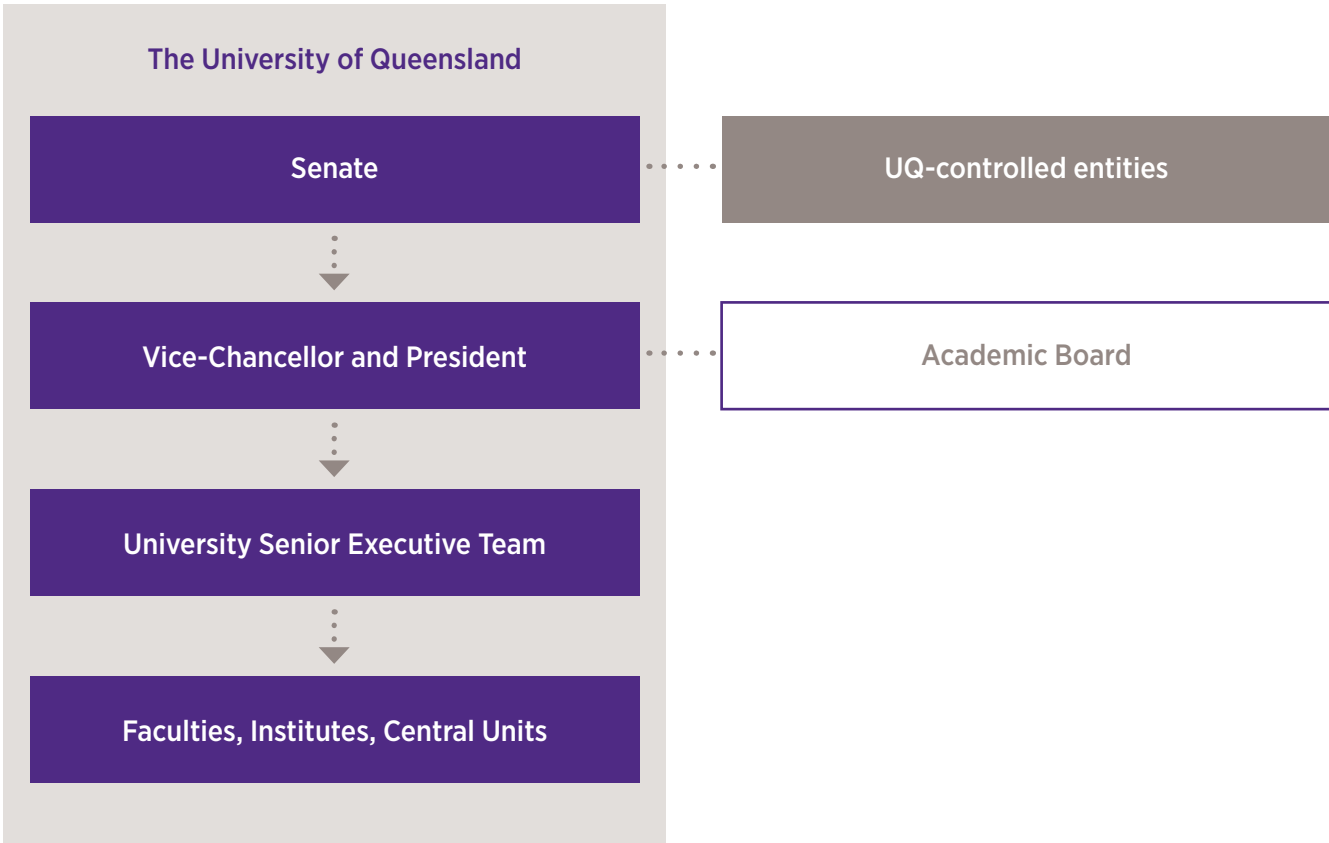
Besides our three campuses in South East Queensland, we also have UQ representatives in India, Indonesia, Colombia and Vietnam, plus a range of international partners and contacts around the globe (41 partners in North America, 34 in Latin America, 97 in Europe, 3 in Sub-Saharan Africa, 5 in North Africa and the Middle East, 26 in South and Central Asia, 137 in North-

East Asia, 61 in South-East Asia, and 12 in Oceania – more than 400 partners in 60 countries).

UQ's total student base in 2021 was 56,273, including 20,982 international students from across the globe.

UQ's full-time equivalent staff (including projected numbers for casual staff) in March 2021 equated to 6,917 (2,864 academic and 4,053 professional staff).

UQ's Governance and Management Framework demonstrates the commitment of UQ Senate and management to the effective and efficient governance and management of the University, and is designed to promote responsible management and conduct of UQ. It seeks to enable governance and management responsibilities to be supported and carried out in a planned, organised, coordinated, controlled and transparent manner.



Operations

UQ's core purpose is to deliver for the public good through excellence in education, research and engagement with our communities and our local, national and global partners.

UQ offers study and research opportunities across one of the widest discipline ranges in Australia, through six faculties and eight internationally acclaimed research institutes, with expertise in social sciences, neuroscience, nanotechnology, food innovation, and many more. During 2021, we offered around 390 programs and 3,400 courses, from tertiary preparation to postdoctoral level.

UQ research creates value that translates into impact. Our researchers work closely with local communities, all the way up to global partnerships with government and business partners, to solve the world's most challenging problems. We are also commercialising our research ideas through licensing and creating startup businesses.

Most of UQ's expenditure directly supports teaching and research, with the remainder used to improve and maintain libraries, student services, public services, academic support services, property and facilities, and general administration.

The University recorded a consolidated surplus of \$341.9 million for 2021. This compares to a [consolidated surplus of \\$108.7 million in 2020](#).

UQ's strategic priorities for 2022–2025 were developed around three domains that reflect the core purpose of the University:

- Learning and student experience
- Research and innovation
- Enriching our communities.

Investments

UQ's Investment Policy provides the framework within which investment opportunities are assessed, appropriate investment strategies adopted, and investment performance optimised.

As at 31 December 2021, \$950 million was held in the UQ Investment Fund and \$5.8 million in the UQ Socially Responsible Investment Green Fund.

UQ periodically reviews the environmental, social and governance (ESG) framework adopted by its Fund Managers.

Partnerships

UQ has a long history of successful partnerships with startups, local businesses, multinational corporations, governments, NGOs, funding bodies and other research institutions. The UQ Industry Partnerships Framework seeks to support engagement with industry partners external to UQ, to deliver maximum impact across research, commercialisation, innovation, teaching and learning, and engagement.

UQ also collaborates with international researchers, teachers, innovators, funders and alumni to create a cleaner, healthier and happier future. Our international partnerships take many forms, including joint research centres, licensing deals, scholarships, internships, graduate employment programs, development projects and philanthropic foundations. Our Global Engagement Framework guides UQ in the identification and selection of partnerships, and includes specific country and partner plans to support the expansion of UQ's global profile.

Through an extensive network, our staff and students connect with industry partners in Australia and around the world. These highly successful collaborations demonstrate that innovation is best achieved through teamwork, and that [industry partnerships](#) can drive excellent outcomes that create change.

Supply chain

Our supply chain includes businesses with whom we have a direct relationship, as well as any supplier providing input into the goods and services supplied by our direct suppliers.

Our supply chain is large and complex. During 2021, we had more than 24,000 direct suppliers from over 80 countries.

Over 88 per cent of our \$690.55 million procurement spend (\$610.35 million) was with Australian-based suppliers. We recognise, however, that where suppliers are located does not necessarily represent the country of origin of the goods and/or services supplied.

As part of our commitment to our Reconciliation Action Plan, we are working to increase our procurement spend with Aboriginal and Torres Strait Islander-owned businesses. Maintaining membership with Supply Nation, which provides access to Australia's leading database of verified Indigenous businesses, helps us achieve this commitment.

We also aspire to 'buy local' and consider application of the Local Benefits Test for significant procurement activities, i.e.

procurement with a value threshold of \$1 million and over. This ensures that price is not the only criterion for decision-making when selecting a preferred supplier.

Our Enterprise Procurement team, along with the Category Management teams, manage many of the key supplier relationships that cover our largest categories of spend including construction, refurbishment and works, laboratories and research, plant and equipment, buildings and grounds, and IT hardware and software. Collectively, these categories accounted for around 60 per cent of our procurement spend during the year.

These support teams also manage and/or provide advice on sourcing activities with an estimated spend of more than \$200,000. Such procurement activities follow managed sourcing processes, as part of which suppliers are required to provide responses in relation to ethical and social considerations.

UQ procured goods and services across these categories:³

**Audiovisual**

**IT professional services**

**Office-related supplies and services**

**Buildings and grounds**

**IT software**

**Plant and equipment**

**Construction, refurbishment and works**

**Laboratories and research**

**Property management**

**Corporate professional services**

**Library services**

**Student services**

**Human resources**

**Logistics and storage**

**Telecommunications**

**IT hardware**

**Marketing and media**

**Travel and entertainment**

**Utilities and renewables**

³ Australian University Procurement Network category taxonomy

COVID-19: impact and response

Like the year prior, 2021 was an extraordinary year.

We recognise that COVID-19 may have escalated the risk of modern slavery and other forms of exploitation in parts of our operations and supply chain, as workers generally became more vulnerable during the pandemic.

As the University operates in a dynamic global environment, the COVID-19 pandemic significantly impacted Australia's higher education sector – primarily due to the closure of Australia's international borders and the partial shutdown of campuses. Many international students were unable to travel to Australia, which resulted in a reduction in revenue from international student fees. Moreover, the University had to rapidly make unprecedented changes to workplace practices and pedagogical approaches to comply with new public health measures. We moved quickly to adapt, embracing online learning, supplemented with multiple social and/or virtual networking events, which enabled off-campus students to continue to engage with their peers.

Our efforts to embed human rights due diligence occurred against a backdrop of ongoing impacts from COVID-19. During this time, we remained committed to using our integrated and proactive risk management approach for identifying, preventing, and mitigating the potential for modern slavery in our diverse operations and supply chain.

COVID-19 also led to a significant and urgent increase in UQ's requirements for personal protective equipment (gloves, masks, gowns) and cleaning products in general. As part of our supply chain risk mitigation strategy, we took dedicated measures to establish long-term supply arrangements which, in turn, led to more responsive engagement of suppliers and improved management of supply lead times. In many ways, this mitigation strategy addressed the risks of modern slavery due to the turmoil in the supply chain, coupled with a lack of transparency on the original source of supply.

UQ continued to engage fairly with suppliers, and this included maintaining orders to ensure business continuity.

With our students being at heightened risk of experiencing modern slavery – both in Australia and overseas due to systematic exploitation, deceptive employment practices of employers, and heightened vulnerability caused by COVID-19 – supporting our students' wellbeing and mental health was a critical focus.

During the year, many students and their families had their financial positions threatened or strained, a known driver of



The supply of personal protective equipment became a major issue for the University in 2021.

engagement in modern slavery practices. UQ responded by implementing services and support to help alleviate these financial pressures, which may also have reduced the necessity to engage in sub-optimal employment relationships.

We provided [regular updates](#) to our student community, and undertook additional initiatives to ensure students were informed about their rights and were provided with the appropriate support services and information to seek help. These included:

- grant support to eligible returning international students to assist with the cost of government quarantine under the [Queensland Students Arrival Plan](#)
- setting up Pfizer vaccination clinics at the St Lucia campus for all UQ students and their families, including international students without a Medicare number
- approving temporary policy adjustments in recognition of the current disruption to student learning and outcomes
- providing access to student service advisers and support services
- introducing a UQ COVID-19 Offshore Online Study Tuition Fee Rebate for eligible international students.

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

Modern slavery can occur in many forms, encompassing types of exploitation that include inter alia, human trafficking, forced labour and forced marriage. Furthermore, these exploitative practices rarely occur in isolation, often intersecting with other complex challenges and systems such as gender and racial discrimination, weak rule of law and poor labour standards.

We continue to use the Risk Model⁴ below to determine where our operations and supply chains may present modern slavery risks, and have considered the following risk factors in the context of our broad categories of workers (employees, students, volunteers, workers of partners, contractors and supply chain workers):



We recognise that our operations and supply chains are highly complex and diverse in nature. In delivering our research and teaching services, we operate in some locations, sectors and supply chains that may have an elevated exposure to the risk of modern slavery. These warrant a heightened standard of vigilance in meeting our obligations.

Modern slavery risks may arise due to issues present in the countries and regions in which we operate and from which we source, the type of products and services we procure, and the specific entities with which we engage. As such, our modern slavery risk profile continually evolves and potential modern slavery risks may change over time. These changes can reflect internal factors such as establishing new operations, or external impacts such as COVID-19.

⁴ Adapted from *Addressing Modern Slavery: A Guide for Australian Businesses*; Australian Red Cross

Operations

During 2021, UQ undertook detailed risk assessments with organisational units and controlled entities to understand and assess modern slavery risk, existing controls and proposed additional controls.

UQ's primary operations, based in Australia, are subject to a strong regulatory framework which guards against the risk of modern slavery. However, some areas that are more removed from the benefits of that regulatory framework are potentially at risk of modern slavery (or its early indicia – forced labour).

Worker Type	Activity	Risk overview	Risk assessment
UQ employees	Workers engaged via an employment contract directly with UQ	Underpayments, when present with other factors, may be an indicator of modern slavery	Modern slavery risk assessed as low due to: <ul style="list-style-type: none">• UQ's primary operations are located within Australia, which has a robust regulatory framework addressing trafficking, labour exploitation and slavery-like conditions• Employee engagements are governed by an enterprise bargaining agreement and regulated by UQ's comprehensive suite of policies and procedures coupled with formal, transparent grievance mechanisms• Standard and rigorous recruitment processes are followed• Processes are being established to ensure that UQ's payment systems and procedures properly reflect the responsibilities and workloads of staff• UQ has direct control over its arrangements
Workers of partners	Workers engaged as part of UQ's teaching, research, consultancy and commercial partnerships globally	<ul style="list-style-type: none">• Some research projects in 'high-risk' countries with known and systemic exploitation and modern slavery practices, where the project is heavily reliant on third-party providers• Some research categories such as clinical and research trials including human tissue and data and sample collection in countries with weak governance on informed consent.• Some research undertaken in countries with weak rule of law or relying on third-party providers for data collection, modern slavery risks can occur beyond the reach and control of any organisation• Possibility that some international partners may be engaged, directly or indirectly, in modern slavery practices or otherwise operate in risky contexts	Modern slavery risk assessed as low due to: <ul style="list-style-type: none">• UQ's policy framework which includes:<ul style="list-style-type: none">– partner due diligence– contractual controls and established reporting mechanisms• Oversight of engagements by UQ's central support functions at a corporate level <p>Additional controls being considered:</p> <ul style="list-style-type: none">• <i>Update of research and commercialisation contract templates to include modern slavery clauses</i>• <i>Assess research projects for modern slavery risks as part of the due diligence process</i>• <i>Conduct a comprehensive risk analysis of UQ's operations in high-risk jurisdictions</i>
Volunteers	Workers volunteering their time and services to UQ in order to build skills and extend personal and professional networks	Volunteers may not have the same protections as UQ employees. This activity has potential to be regarded as exploitative business practice if used as a substitute for paid employment, particularly in international jurisdiction	Modern slavery risk assessed as low due to UQ's policy framework being designed to ensure that volunteers are engaged on a truly voluntary and non-exploitative basis
Students seeking work experience	Students engaging in internships at local and international businesses, to apply and contextualise their studies in an organisational environment and gain competitive edge in job market	Students are particularly vulnerable to being exploited in the workplace, especially those with fewer immediate support networks, lower English language proficiency, or are unaware of applicable workforce laws	Modern slavery risk assessed as low due to: <ul style="list-style-type: none">• Strong regulatory frameworks where these opportunities are within Australia• UQ's robust student placement framework, which includes:<ul style="list-style-type: none">– policies and procedures– partner screening and due diligence of host organisations– contractual framework– recording and reporting requirements– training and guidance for student supervisors <p>Additional controls being considered:</p> <ul style="list-style-type: none">• <i>Review extent and nature of due diligence performed across UQ organisational units to ensure consistent approach</i>• <i>Include modern slavery clauses in contract templates</i>• <i>Build awareness in students about modern slavery risks and available escalation pathways</i>

Supply chain

UQ primarily sits at the top of the supply chain, often several tiers removed from raw materials production. This increases the challenge of mapping our supply chain.

To build on our preliminary 2020 work, in 2021 we worked towards automating the supplier risk assessment process by partnering with the Australian University Procurement Network (AUPN). This will result in access to a supplier risk portal used to analyse our supply chain. UQ is engaged with other AUPN universities in sourcing and implementation of FRDM. Go-live is targeted for early 2022.

This supplier risk portal scans supplier profiles across multiple risk lenses to help identify the most salient modern slavery risks. The level of potential risk for each supplier influences due diligence approaches including assessment questionnaires, reporting and further engagement with suppliers.

The supplier risk portal leverages information from a variety of sources including records of adverse media releases around modern slavery allegations and breaches.

In addition, we recognise that some of our operational practices, including stakeholder expectations and procurement practices such as seeking to secure lowest prices or setting unreasonable delivery timeframes, may be counterproductive and also influence modern slavery risks within our supply chain.

Given the number of direct suppliers we engage, the number of indirect (or 'secondary') suppliers involved in our businesses is substantial. As the supply chain becomes more remote, influencing the behaviour and conduct of those indirect suppliers creates a greater challenge. We endeavour to do this by raising awareness and engagement among our direct suppliers initially.

Actions taken to assess and address the risks of modern slavery

Managing risk to people is a constant and evolving task.

Our policies and procedures play an important role in embedding respect for human rights in general and setting a standard of behaviour and conduct expectations throughout our operations and related stakeholders. These policies and procedures also help with building a respectful and safe environment and establish a framework to monitor compliance with our expectations. UQ leverages its mature and integrated policy and procedure framework to provide a first line of defence and a range of cohesive levers for risk management.

With our supply chain, our robust procurement framework and associated probity controls call for a consistent approach to procurement activities and responsible purchasing practices, while at the same time managing risks and ensuring clear lines of accountability across our stakeholders.

During 2021, our actions continued to focus on strengthening our understanding and capabilities to identify potential modern slavery risks in our operations and supply chains, improving our policies and processes, and building the ground for enhancing engagement with our suppliers to communicate expected standards of behaviour in their engagement with us.

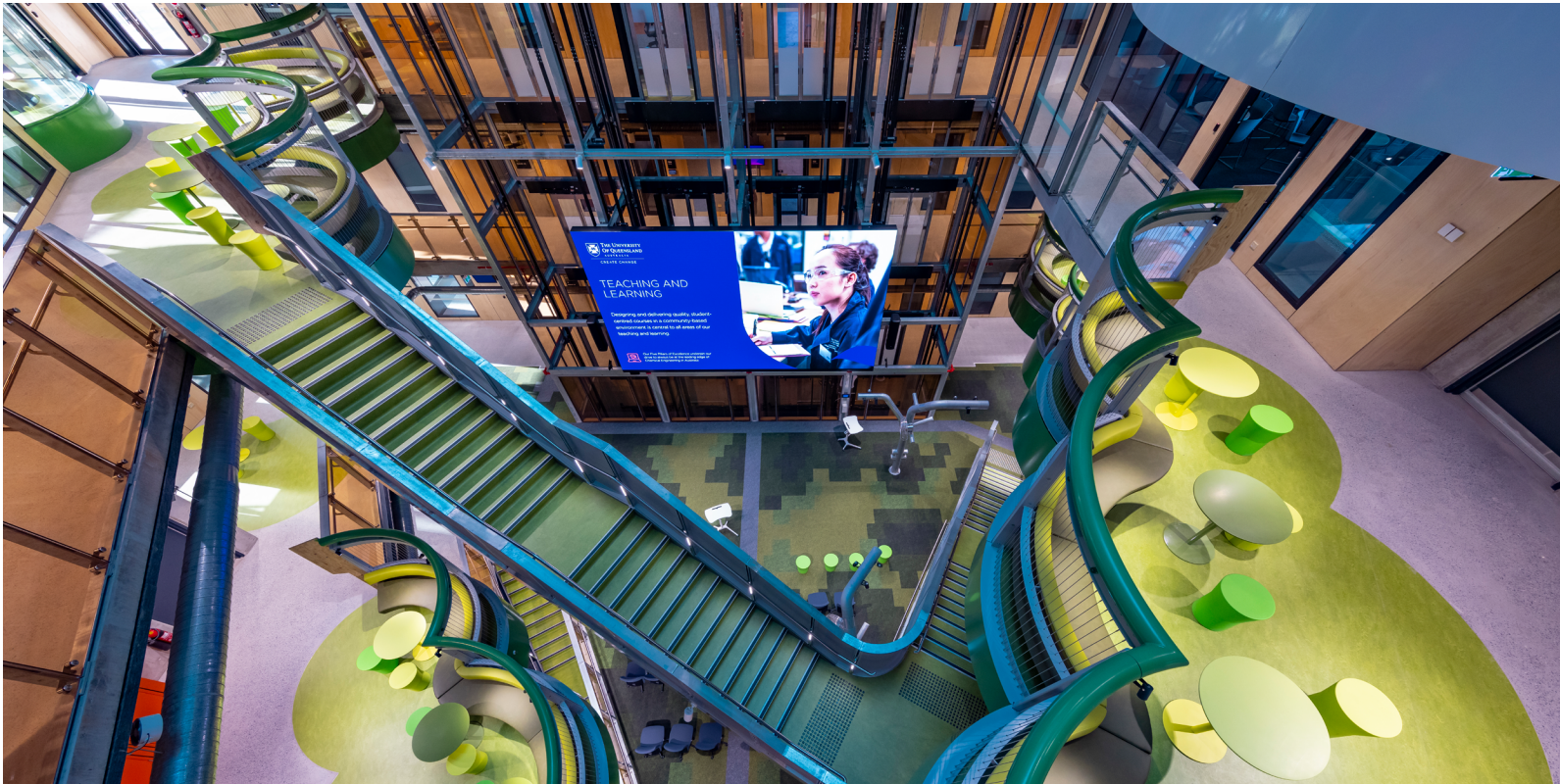
The actions taken during the reporting period to assess and address the risks of modern slavery and UQ's plans for 2022 and beyond to expand the current baseline measures and controls are encapsulated overleaf.

Key highlights of our initiatives are outlined on pages 16–18.

In 2021, UQ's procurement spend was



Construction, refurbishment and works was UQ's top supply chain category by value of spend in 2021: shown here is St Lucia's Andrew N. Liveris building.



Mapping against our action plan

We continued to monitor progress against our 2021 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 (2021)

- ✓ Finalised a Modern slavery awareness webinar to be released during 2022 with specific call to action for staff in senior leadership roles.

Plan for 2022 and beyond

- Conduct an awareness 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 in this space.
- Continue regular education and engagement activities with senior management.
- Provide regular updates to UQ governance bodies.
- Establish reporting on measuring effectiveness of actions.

Modern Slavery Working Group

- ☐ Stakeholder engagement
- ☐ Capability building
- ☐ Monitoring and reporting

Actions during the reporting period (2021)

- ✓ Membership of the Modern Slavery Working Group expanded to include representatives from functional areas including human resources, research grant management, and research.

Plan for 2022 and beyond

- Embed cycle of UQ's modern slavery statement production into annual calendar of work.
- Review and refresh membership of Working Group as necessary to ensure relevancy and provide opportunity to stakeholders across the University to contribute to the group.

Operational risk identification, prioritisation and management

- ☐ Risk assessment
- ☐ Monitoring and reporting

Actions during the reporting period (2021)

- ✓ Performed formal risk assessment of UQ's operations and its controlled entities.
- ✓ Introduced formalised due diligence processes for UQ research partners and collaborators to screen these parties for a range of risk factors including the risk of modern slavery.
- ✓ Developed a repository of Environmental, Social and Corporate Governance (ESG) policies/frameworks of UQ's Fund Managers and reviewed the materials received.

Plan for 2022 and beyond

- Develop and implement targeted education and engagement activities to lift knowledge and awareness of modern slavery risks for high risk areas/activities.
- Conduct further due diligence on operational activities within high risk offshore jurisdictions.
- Strengthen the due diligence process for UQ's research partners and collaborators.

Sector-wide collaboration

- ☐ Risk assessment
- ☐ Capability building
- ☐ Remediation

Actions during the reporting period (2021)

- ✓ Engaged 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 area.

Plan for 2022 and beyond

- Leverage the supplier risk portal available through the AUPN to inform specific supplier due diligence activities.

Supplier risk identification, prioritisation and management

- ☐ Risk assessment
- ☐ Supplier engagement
- ☐ Monitoring and reporting

Actions during the reporting period (2021)

- ✓ Refreshed our supplier invitation documents to enable us to better assess the response of proposed suppliers in addressing modern slavery risks in their operations and supply chains.
- ✓ Refreshed our procurement contracting suite to include clauses in relation to modern slavery.
- ✓ Developed a 'Supplier Standards' document setting out UQ's expectations of its suppliers in terms of acting ethically, with integrity, and according to good commercial and social practice.
- ✓ Introduced guidance materials on consideration and application of the Local Benefits Test to procurement activities to encourage and support local suppliers to supply to UQ.

Plan for 2022 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.
- Develop understanding of the supplier risk portal provided through the AUPN.
- Develop guidelines to complement the AUPN 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 to assess modern slavery risk profiles 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.
- Raise modern slavery awareness across the supply chains of UQ controlled entities.

Education, training and capability uplift

- ☐ Capability building

Actions during the reporting period (2021)

- ✓ Engaged senior management and raised awareness on modern slavery within UQ organisational units and UQ controlled entities.
- ✓ Developed practical guidance and offered training pathways to improve understanding of modern slavery risks.

Plan for 2022 and beyond

- Undertake dedicated training efforts aimed towards improving knowledge and awareness of modern slavery issues within high-risk areas of the University.
- 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 (2021)

- ✓ Established clear escalation pathways in relation to reporting modern slavery complaints and/or concerns.
- ✓ Incorporated these pathways into education and engagement materials.

Plan for 2022 and beyond

- Formalise a remediation framework to address investigation around reported occurrence of modern slavery and build a remediation action plan.

Governance, Risk and Policy framework

- ☐ Governance framework

Actions during the reporting period (2021)

- ✓ Undertook a gap analysis of UQ's current policy and procedure framework against our aspirations to determine the need or otherwise of a standalone UQ Modern Slavery Policy.

Plan for 2022 and beyond

- Seek endorsement from the Senior Executive Team in relation to not establishing a standalone UQ Modern Slavery Policy.
- Ongoing review and improvement of policies, procedures and processes to increase their effectiveness in helping to manage UQ's modern slavery risks.
- Investigate how modern slavery risk management can be integrated into UQ's enterprise risk framework.

2021 Highlights

Modern slavery risk assessment

During the reporting period, we conducted an enterprise-wide modern slavery risk assessment of our operations, with the intention of reviewing our activities against modern slavery indicators to help us understand potential gaps and opportunities for improvement, or identify new potential modern slavery risks that have emerged in our business operations.

The findings of this risk assessment illustrated at a general level how modern slavery risks may materialise during UQ's operations. We intend to use the findings from the modern slavery risk assessment to conduct further due diligence on areas of our operations with potential modern slavery risks and to target our awareness initiatives in those particular areas.

Capability building

UQ continued its ongoing focus on capability building for its staff including senior management and decision-makers across the University. Our employees are our first line of defence in identifying and helping us address any instances of modern slavery, so building a broad and deep understanding of modern slavery risk management among staff is imperative. Improving awareness will lead to improving operational practices and purchasing behaviour, and adapting best practice.

Building capability and knowledge in our own operations ensures that our staff are not only educated on their own rights but also that staff in partner-facing roles are alert to modern slavery risks in our operations and supply chain, understand the key signs and red flags, know when and how to escalate concerns, and thereby will operationalise these commitments.

We used a variety of forums and tools to raise this awareness.

We continued to provide targeted training programs at UQ with a special focus on managers about appropriate workplace behaviour, mental health, and fraud and corruption. More generally, training on our Code of Conduct reinforced the expectation that our staff follow applicable laws and report concerns of illegal or unethical activity.

During the reporting period, we published our own [Modern Slavery](#) webpage with links to online training materials built by specialist external organisations to upskill our stakeholders on modern slavery risks. Since its launch, more than 550 stakeholders have accessed this webpage.

We also released several posters across the University to capture attention and spark curiosity about modern slavery for our staff and students. We raised awareness of modern slavery risks among members of the UQ Compliance Network, a forum designed specifically for staff in compliance-based roles at the University.

We will continue to target our efforts towards raising awareness of our buying community to build knowledge and capability to enable greater engagement and integration of modern slavery risk mitigation practices into the procurement lifecycle.

Source to contract platform

We completed the procurement of a source to contract digital procurement platform 'UQProcure'. This platform will not only help us improve the visibility of our suppliers but will also offer several opportunities to embed supplier due diligence, risk assessment, and awareness-raising as part of the supplier registration process, while at the same time streamlining supplier management processes.

This will create staff capacity to deliver more focused supplier management activities, including actively engaging key suppliers on modern slavery issues.

Supplier due diligence

During the reporting period, UQ established a supply arrangement for printing, merchandise and apparel. Extensive evidence exists in the public domain of human rights issues in the apparel and merchandise industry. While modern slavery was not the primary driver for setting up this arrangement, it resulted in benefits that incidentally assist with modern slavery mitigation:

- improving supplier diversity
- developing strategic partnerships and long-term relationships with suppliers
- introducing formal mechanisms for performance management.

During the year, we held contract review meetings with the suppliers on the arrangement, and discussed ethical sourcing initiatives and human resource management, in addition to traditional contract performance indicators.

Supplier Standards

We developed and consulted internally on UQ's Supplier Standards during the reporting period. This document sets UQ's principal expectations of its suppliers.

The purpose of these Standards is to align our supply chain with our principles for operating as a socially responsible organisation.

During 2022, we will finalise these Standards and commence a supplier engagement campaign to embed reference to the Standards in our supplier relationship management practices.

Strengthening our contract management framework

We recognise that contractual mechanisms are an important part of mitigating the risk of modern slavery, but they are only effective when accompanied by robust compliance monitoring.

Compliance monitoring is always going to be challenging, given the multiple touch points a partner or supplier can have across the University and the varying degrees of capability and expertise in contract management across our operational areas. Nevertheless, we worked on strengthening our contract monitoring practices and created a draft Supplier and Contract Management Framework that can be applied consistently across the University. This will equip our staff with the tools to proactively monitor compliance with contractual controls, and mitigate the risk of modern slavery indicators in our supply chain, research and partnership engagements.



UQ procures goods and services for a wide range of facilities, such as the Small Animal Clinic at UQ Gatton.

Research partnerships

During the reporting period, we put in place baseline and comprehensive due diligence assessments using a screening tool when engaging downstream partners as part of our grants management. Full use of these tools will roll out over the next 12 months, and as we develop and introduce formal control frameworks in response to the modern slavery risk assessment, we will review and adjust the due diligence framework as necessary.

Escalation pathways

An effective escalation and remediation framework is critical to a robust modern slavery due diligence program. We are committed to providing the opportunity to all our stakeholders including staff, students, suppliers and the general community to be able to raise concerns in relation to not only modern slavery but also in relation to upholding broader human rights.

Broadly speaking, UQ encourages a culture of openness in which anyone can raise concerns about our operations in general. We have formal grievance mechanisms established under our [Complaints Management Policy](#) for reporting any suspected unethical, illegal, fraudulent or undesirable conduct within our own operations and supply chains, including suspected adverse impacts on people, communities or the environment.

A key focus for the reporting year was to provide stakeholders, both internal and external, with multiple avenues specifically to report issues and concerns in relation to modern slavery. We promoted these reporting mechanisms through our training and engagement initiatives.

Any modern slavery concerns raised through these reporting channels will be escalated to our Modern Slavery Working Group to coordinate with appropriate stakeholders to investigate and address the issue/s raised.

Considering the breadth of our operations and supply chain, and the diverse nature of risk profiles, we are continually striving to improve opportunities for workers to raise issues through our established escalation pathways.

We understand that remediation is a challenging, sensitive and multifaceted piece of work. We will work towards formalising a remediation framework that is responsive to new lessons and is dynamic in execution.

Policy framework

During the reporting period, we undertook a detailed gap analysis to identify and/or confirm the need for a standalone UQ Modern Slavery Policy. This preliminary needs assessment highlighted the following aspects:

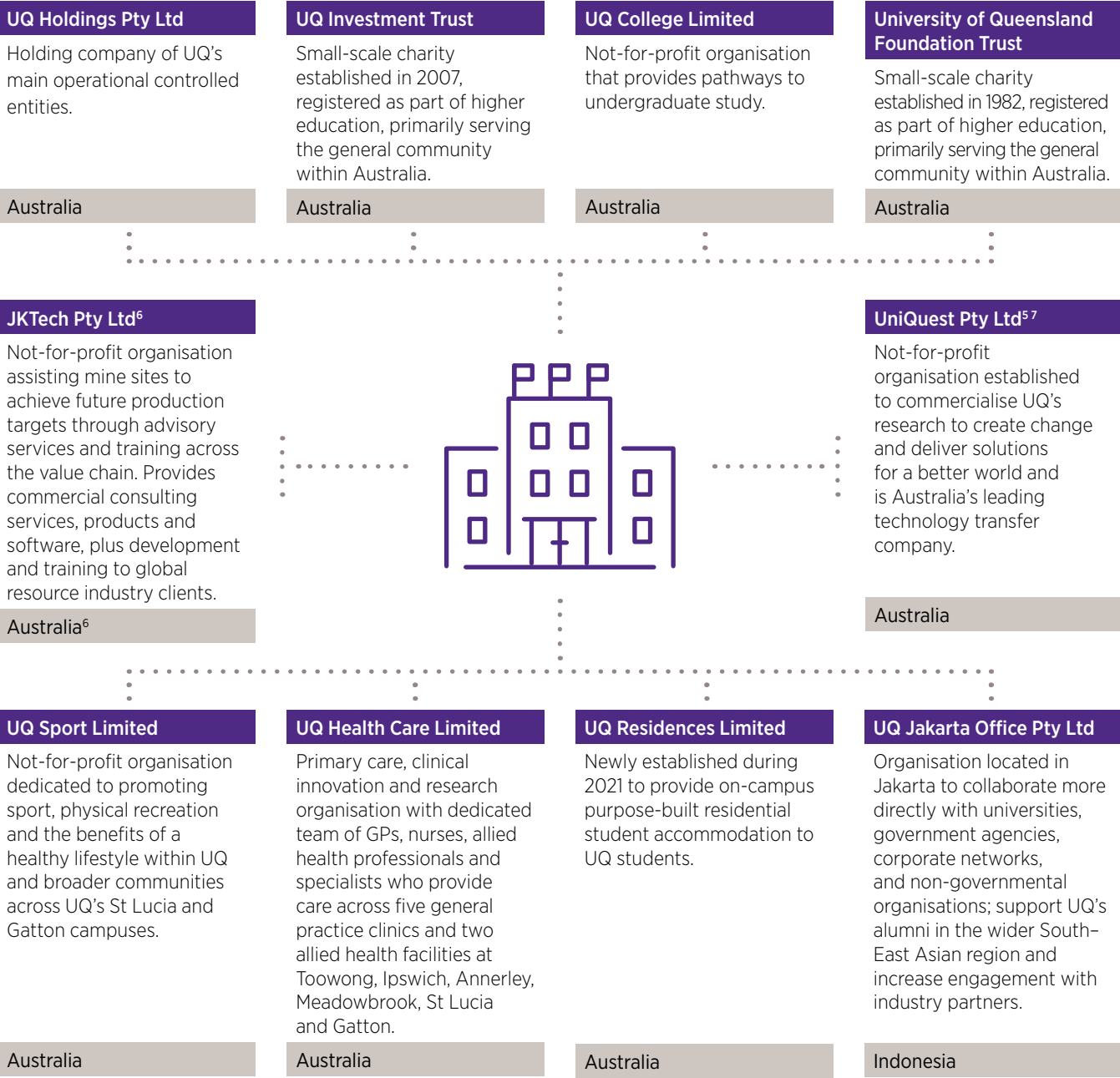
- Broader modern slavery considerations that may be expected to be addressed by a Modern Slavery Policy fit naturally within UQ’s existing comprehensive UQ policy framework, supported by UQ’s Governance and Management Framework.
- Modern slavery issues may be better managed via education, raising awareness, and engagement with stakeholders as opposed to driving compliance through a policy document.
- It may be most effective to improve, strengthen and enhance existing processes, initiatives and policy documents to drive compliance in this space.

During 2022, we will share this assessment and our recommendation with our Senior Executive Team seeking their support and endorsement. We will also progressively identify UQ policies where we may be able to strengthen our modern slavery commitments or where modern slavery protections can be incorporated.

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.



⁵ This controlled entity is also a parent company to other subsidiaries

⁶ JKTech Pty Ltd's subsidiary is established in South America. 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). The main 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.

⁷ Activities comprise commercialisation of UQ intellectual property (IP), including the management and protection of IP, licensing, establishment and management of startups and spinouts and drug discovery and development activities through the Queensland Emory Drug Discovery Initiative (QEDDI).

Key insights on modern slavery risks and controls

Entity	Activity	Risk overview	Risk assessment
UQ Holdings Pty Ltd	This entity was created by the UQ Senate to oversee and monitor UQ's interests in its controlled entities; limited breadth and scope of operations does not warrant a modern slavery risk assessment		
UQ Investment Trust	Limited breadth and scope of operations: does not warrant a modern slavery risk assessment		
UQ College Limited	Procurement of goods and services	Supply chain risks are not materially different to those of UQ's own supply chains	<ul style="list-style-type: none">• Senior management entrusted with overall responsibility for procurement activities• UQ supply chain is leveraged to the extent possible and practicable
University of Queensland Foundation Trust	Limited breadth and scope of operations: does not warrant a modern slavery risk assessment		
JKTech Pty Ltd	Operations of the subsidiary entity SMI-ICE Chile SpA operating offshore in Latin America	Undertaking operations in an offshore location with a different regulatory environment	Modern slavery risk assessed as low due to: <ul style="list-style-type: none">• Governments in the Americas have taken strong steps to respond to modern slavery, with improvements in victim identification mechanisms and support services• Strong governance structure and reporting requirements around operations of the subsidiary entity
	Agency engagements to provide services within USA, Canada, South Africa, South America and Mexico	Agents may operate within high-risk geographies	Modern slavery risk assessed as low due to: <ul style="list-style-type: none">• Robust contractual framework• Comprehensive due diligence processes
	Procurement of materials and labour hire services	Supply chain risks are not materially different to those of UQ's own supply chains	Generally, reputable suppliers are selected for procuring goods and services; background checks conducted as necessary
	Supply of goods and services to clients	Limited visibility over operations and activities of client entities	Modern slavery risk assessed as low due to: <ul style="list-style-type: none">• Clients are generally reputable and in global mining and resources companies• Due diligence processes in place, including conducting background checks as required• Comprehensive suite of policies and procedures which address ethical considerations
UniQuest Pty Ltd	Engagements with domestic and overseas organisations in relation to commercialisation of UQ IP	Engagements with entities in countries with weak rule of law can lend itself to modern slavery risks	Modern slavery risk assessed as low due to comprehensive due diligence processes in relation to prospective partners, which include potential financial, governance, compliance and reputational risks being in place
	Engagement of services of international contract research organisations (CROs) to undertake specialist research services associated with Queensland Emory Drug Initiative (QEDDI)	Engagements with entities in countries with weak rule of law can lend itself to modern slavery risks	Modern slavery risk assessed as low due to: <ul style="list-style-type: none">• Comprehensive due diligence processes in relation to CROs including visiting laboratories and seeking third-party validation• Robust contractual framework which includes established reporting mechanisms
	Procurement of goods and services	Supply chain risks are not materially different to those of UQ's own supply chains; additionally, the volume and value of procurement is relatively low	<ul style="list-style-type: none">• Procurement is undertaken pursuant to UniQuest policies and procedures (including Board-endorsed limits of authority) together with a robust contract approval process; legal and financial advice is accessed as required• Long-standing relationships with majority of suppliers

Entity	Activity	Risk overview	Risk assessment
UQ Sport Limited	Casual staff engagements	The general complexity around casual staff engagements, when present with other factors, may be an indicator of modern slavery which could prompt further investigation	Modern slavery risk assessed as low due to: <ul style="list-style-type: none">• UQ Sport’s primary operations where activities are directly undertaken by its employees including casual staff are located within Australia, which has a robust body of legislation to deal with trafficking, labour exploitation and slavery-like conditions• Casual staff engagements are governed by the same suite of policies and procedures as applicable to continuing and fixed-term engagements and have similar access to formal grievance mechanisms• Casual staff engagements are governed by the Australian Industrial Relations Framework including National Employment Standards and UQ Sport Limited Enterprise Agreement. The terms and conditions of casual staff engagements are closely monitored to ensure compliance with these frameworks• Standard recruitment processes are followed
	Procurement of goods and services	Supply chain risks are not materially different to those of UQ’s own supply chains with the exception of procurement categories such as contractors for delivery of fitness training and sporting goods and equipment	<ul style="list-style-type: none">• Majority of direct spend is with Australian suppliers.• UQ Sport utilises Indigenous businesses where possible in its supply chain with a combined focus on Indigenous procurement that facilitates an organic growth cycle that translates into increased local employment opportunities• UQ’s supplier panel arrangements are leveraged wherever possible
UQ Health Care Limited	Procurement of goods and services	Supply chain risks are not materially different to those of UQ’s own supply chains	<ul style="list-style-type: none">• All direct spend is with Australian suppliers• Queensland Government Standing Offer Arrangements are leveraged wherever possible
UQ Residences Limited	As the entity commences operations during 2022 and gradually expands its footprint and diversity, a modern slavery risk assessment will be completed		
UQ Jakarta Office Pty Ltd	Procurement of goods and services	Supply chain risks are not materially different to those of UQ’s own supply chains	Procurement is undertaken pursuant to UQ’s policies and procedures
	UQ student internships	Students are particularly vulnerable to being exploited in the workplace, especially those with fewer immediate support networks, lower English language proficiency, or are unaware of applicable workforce laws	Modern slavery risk assessed as low due to compliance with UQ’s robust policy framework
	Engagements in relation to business development with Indonesian partners	Challenging funding environment may make these activities susceptible to modern slavery risks	Modern slavery risk assessed as low due to: <ul style="list-style-type: none">• UQ has oversight for these engagements• Robust contractual framework• Due diligence processes• Compliance with UQ’s comprehensive policy framework

Assessing effectiveness

UQ recognises the importance of developing a clear reporting framework to measure the effectiveness of our approach to addressing modern slavery risks and to enable a program of continuous improvement.

- We continued to capture and measure our approach across the following three focus areas:
- Policy commitment
 - Modern slavery due diligence
 - Remediation framework.

During the reporting period, effectiveness was assessed through our governance process in terms of oversight of our University Senior Executive Team, and engagement with our cross-functional Working Group and various UQ organisational units for feedback on our approach. We recognise there is much

more for us to do in this space in terms of developing clear mechanisms to assess the effectiveness of our actions. We will prioritise this over coming years.

More specifically, work planned for future years includes developing a formal and evidence-based assurance mechanism to assess the effectiveness of our actions against our modern slavery progress tracker. This will be done by developing key performance indicators to measure the effectiveness of our actions. The metrics will include a mix of aspects in relation to our operations and supply chain, such as training participation, engagement feedback, supplier risk assessments and complaints received.



- 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 acknowledge that the risk of modern slavery is real and that eradicating modern slavery is both complex and challenging, requiring continual and sustained efforts. While comfortable with our initial efforts, we recognise that this is an iterative journey that requires long-term commitment to look beyond what is immediately visible across our operations and supply chain.

Approval

This Modern Slavery Statement was approved by The University of Queensland Senate at its meeting on 11 April 2022 and signed by the Vice-Chancellor and President, Professor Deborah Terry AO, in accordance with the *Modern Slavery Act 2018 (Cth)*.



Compliance with mandatory criteria as outlined in the <i>Modern Slavery Act 2018 (Cth)</i> , s16(1)	Pages
a] Identify the reporting entity	2-5
b] Describe the reporting entity's structure, operations and supply chains	6-8
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	10-12 20-21
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	13-21
e] Describe how the reporting entity assesses the effectiveness of such actions	22-23
f] Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	24
g] Provide any other relevant information	9

Consultation

The consultation process for this Statement was managed by UQ's cross-functional Modern Slavery Working Group, and involved the following stakeholders:

- UQ's governance bodies – Senate Governance and Senate
- UQ's senior management team
- UQ controlled entities
- the Australian University Procurement Network (AUPN)
- various UQ organisational units.

The remit of the Working Group is to develop, review and refine UQ's response to modern slavery as a continuing journey.

During the reporting period, UQ consulted with its controlled entities to raise awareness, frame expectations, and gain an understanding of their approach to addressing modern slavery risks. UQ also supported its controlled entities to undertake modern slavery risk assessments of their operations and supply chains.

Where possible and permitted by law, UQ seeks to work in collaboration with industry-wide initiatives and peer organisations to share initiatives and information, scale impact, and promote a coordinated approach to managing modern slavery risks.

UQ recognises that collaboration with government is also an important strategy to better manage modern slavery risks. During December 2020, the Office of the Chief Advisor – Procurement, Department of Energy and Public Works released a survey of Queensland Government agencies to gather baseline information from which to begin co-designing an appropriate whole of government procurement response to address modern slavery in government supply chains.

As a key stakeholder, UQ participated in the survey and the consultation process that followed during 2021, which included workshops aimed at prioritising ideas sourced from the survey results and good practices, and informing development of policy guidance and tools. UQ also provided feedback on the draft framework and roadmap actions developed by the Department as part of a maturity model towards eliminating modern slavery in government supply chains.

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