

Modern Slavery Statement

RMIT

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What's next...



Context and purpose

This statement provides an overview of RMIT's commitments and actions to address the potential risk of modern slavery across the RMIT Group.

For the purposes of the RMIT Modern Slavery Statement, the RMIT Group consists of Royal Melbourne Institute of Technology (ABN 49 781 030 034), RMIT Vietnam and Europe, RMIT Training (ABN 61 006 067 349), and RMIT Online (ABN 38 614 454 170). These entities are primarily based in Australia, Vietnam and Europe (Spain).

The statement responds to the Modern Slavery Act 2018 (Cth) (the Act), and evidences compliance with reporting obligations to describe:

- The RMIT Group, structure, operations and supply chains
- Potential risks of modern slavery risks across our operations and supply chains
- Actions taken to assess and address risk of modern slavery across operation and supply chains
- How we assess effectiveness of our actions
- Our consultation processes with controlled entities.

Our focus has been on initial screening of Tier 1 supplier expenditure from RMIT Australia, with intentions to expand our analysis across our supply chains. We acknowledge that whilst we have made good progress, we still have work to do to establish a deeper understanding of supply chain risk across our controlled entities. On 7 June 2021 RMIT introduced a new system which has brought together our systems and processes on one integrated platform.

Our methodology and actions have to date not identified any instances of modern slavery. We recognise however that our current state reflects the start of modern slavery awareness and maturity, and that of our partners, vendors and suppliers, in the establishment of their modern slavery due diligence.

Our first Modern Slavery Statement is being submitted on 30 June 2021.

The statement covers the reporting period of the 2020 calendar year, consistent with our requirements under the Act. This reporting date is determined by RMIT, and Australian Universities', use of calendar year reporting. We also include initial relevant activities from the commencement of the Modern Slavery Act in 2019 that supported our 2020 progress.

Compliant with the requirements for endorsement the RMIT Group Modern Slavery Statement is endorsed by the RMIT Council and signed by the Vice-Chancellor and President.



Vice-Chancellor and President

Our purpose and values

RMIT is a multi-sector university of technology, design and enterprise with 95,000 students and almost 10,000 staff globally.

RMIT's mission is to help shape the world through research, innovation, quality teaching and engagement, and to create transformative experiences for students, getting them ready for life and work.

Our values inspire us, shape how we know and be on place, wherever we are in the world, and guide how we live and work together. RMIT's commitment to the expression of institutional values across our ways of working, being and knowing align with our modern slavery response.

Our values of *inclusion, imagination, agility, courage, passion* and *impact* inform and shape our commitment to identifying and addressing risk of modern slavery across our operations and contributing to global efforts to identify and address modern slavery obscured in supply chains.

This Modern Slavery Statement reflects our commitment, planning and development of modern slavery awareness, and our initial actions to:

- Embed modern slavery awareness across the RMIT Group
- Establish governance, analysis and reporting that will guide our long-term effort
- Establish a methodology to identify risk of modern slavery
- Our foundational steps to embed supply chain risk assessment, response and remediation efforts across operations and supply chains, and the broader operations of the RMIT Group.



Our approach

Making values real in our risk and compliance frameworks

RMIT's Modern Slavery Act methodology is informed by our values and purpose, and the expression of these values across our integrity, compliance and risk frameworks.

Research and evidence informed

We are guided by the growing body of advice released by the Australian Government, on strategies to identify and mitigate risk of modern slavery practices across operations and supply chains.

We have also drawn upon the significant research and analysis, in particular the Global Slavery Index, in our understanding of modern slavery prevalence, factors and indicators, and remediation strategies required to address modern slavery risks should be they be identified in our operations and supply chains.

RMIT's Business and Human Rights Centre is a hub of expertise and research on the intersection of business ethics, accountability and human rights, generating research and education, engaging in policy analysis, evaluation and methodological development.

RMIT is committed to the UN Sustainable Development Goals and is a signatory to the UN Global Compact. There is considerable overlap between the human rights aspects of these commitments, and our growing awareness of modern slavery issues. Our work on reviewing and refreshing corporate social responsibility screening is a joint effort aligned with our Sustainability Policy.

RMIT is a member of and hosts the UN Global Compact Network Australia; growing business understanding, collaboration and innovation across the alignment of human rights, labour rights, environment and anti-corruption principles.

RMIT has membership of the Supply Chain

Sustainability School, with access to resources and training on modern slavery, that we have used, and will continue to draw upon.

To support the development of our Modern Slavery Statement, an internal discovery process was undertaken across the RMIT Group, with our initial focus being on RMIT Australia, and on our major modern slavery risks.

This internal scan and assessment process identified operational activities which could expose us to modern slavery risk and broader organisational risks and will continue to inform and guide the organisation's approach to modern slavery.

Understanding that this is a long-term commitment

Our approach is consistent with the Australian Government's advice; that modern slavery risk is both very real, and, very often obscured.

Our approach is cognisant of anti-modern slavery activity requiring a long term, and sustained effort. We understand that this is an evidence based, iterative journey. It requires long term commitment to look beyond, and behind, and underneath, what is immediately visible across our operations and supply chain.

With the release of this modern slavery statement we openly acknowledge that whilst we are proud of our initial efforts in this space, we are just beginning our modern slavery journey.

Modern Slavery Working Group

Our Modern Slavery Working Group oversaw the research and discovery process and formulation of the 2020 Action Plan. The Group includes key stakeholders, including controlled entities, and is being refreshed in 2021 to respond to the learnings of our first year and focus effort for the current and following cycles of developing.

The Group is chaired by the Chief Audit and Risk Officer and reports through to the Audit and Risk Management Committee (and Council), and Vice-Chancellor's Executive (senior management).

Articulating the alignment of compliance and risk as integrity champions

RMIT's compliance commitment is understood as an integrity commitment. Our modern slavery response is shaped by our risk and compliance frameworks:

- Drawing upon the *plan, do, act, check* cycle of our compliance management framework to guide ongoing maturity
- Supporting capability for risk identification, assessment, evaluation and treatment as structured by our risk framework and actioned in areas of responsibility.

Our response is informed by our maturing risk and critical incident management framework, which is the model for business areas to identify and treat risk within their areas, and within our governance and management structure.

Embedding due diligence and mitigation in core systems

Modern Slavery awareness and initial modern slavery risk assessment screening has been integrated into the initial supplier and vendor onboarding process and comprises a part of a very significant renewal of corporate systems – a tangible demonstration of RMIT's commitment to this issue.

Initial screening and risk assessment in our centralised procurement and corporate social responsibility processes recognise the levels of risk for further assessment and management through explicit modern slavery categories. A supplier registration process for all suppliers is in place, full supplier registration for new adhoc requests, and in line with our corporate system renewal, mass supplier migration from SAP to Workday occurred, with modern slavery awareness built into the new system and process.

Where processes are separate from Procurement management, such as global partnership development and management, modern slavery has been referenced and embedded in our partnership management manual, awareness provided for staff, and alignment in our model for partner engagement.

This centralised management is establishing the operational model for modern slavery due diligence initially, and across our entities.

The vendor screening process will continue to mature over time and forms a part of an ongoing body of modern slavery work.

RMIT's Corporate Social Responsibility Framework provides a screening methodology to identify individuals, businesses, or organisations that have the potential to create an ethical or reputation risk to the University so that:

- Appropriate risk mitigation can be implemented, and
- Corporate Social Responsibility (CSR) obligations are met as a UN Global Compact signatory.

Components of the CSR Framework include the CSR Due Diligence Guideline, CSR Supplier Code of Conduct, and CSR Supplier/Partnership Questionnaire. The CSR framework has been developed to assess particular third-party engagements at RMIT and forms part of the wider RMIT due diligence process.

Governance and oversight

RMIT's highest governing body, RMIT Council, is responsible for endorsing this statement. Management accountability for RMIT's Modern Slavery Statement is with the Chief Financial Officer, a member of our Vice-Chancellor's Executive, the highest management forum, and working group leadership and development through the Chief Audit and Risk Officer.

Our anti-modern slavery project draws in stakeholders and responsible officers from across the RMIT Group, including controlled entities, is reported to the Audit and Risk Management Committee, and subsequently to RMIT Council, the university's peak governing body.



Section 1

The entity making this statement



RMIT is a multi-sector university of technology, design and enterprise with 95,000 students and almost 10,000 staff globally.

The University's mission is to help shape the world through research, innovation, quality teaching and engagement, and to create transformative experiences for students, getting them ready for life and work.

RMIT is redefining its relationship in working with and supporting Aboriginal self-determination. The goal is to achieve lasting transformation by maturing values, culture, policy and structures in a way that embeds reconciliation in everything the University does. RMIT is changing its ways of knowing and working to support sustainable reconciliation and activate a relationship between Indigenous and non-Indigenous people.

RMIT's three campuses in Melbourne – Melbourne City, Brunswick and Bundoora – are located on the unceded lands of the people of the Woi Wurrung and Boon Wurrung language groups of the Eastern Kulin Nation.

With strong industry connections forged over 134 years, collaboration with industry remains integral to RMIT's leadership in education, applied and innovative research, and to the development of highly skilled, globally focused graduates.

As a global university, RMIT has two campuses and a language centre in Vietnam and a research and industry collaboration centre in Barcelona, Spain. RMIT also offers programs through partners in destinations including Singapore, Hong Kong, Sri Lanka and mainland China, with research and industry partnerships on every continent.

Controlled entities

RMIT's Controlled entities conduct their business in accordance with their constitutions and charters.

RMIT Europe is a wholly owned entity of RMIT. Its purpose is to promote RMIT's global teaching and research activities in Europe and serves as a gateway for the University to European research, industry, government and enterprise.

RMIT Vietnam the University's Asian Hub, operates across three locations in Hanoi, Ho Chi Minh City and Da Nang and has programs in business, technology, communication, design, fashion and languages.

RMIT Training is a wholly owned entity of RMIT University that provides a range of education solutions to students, academics and professionals located in Melbourne and overseas.

RMIT Online Pty Ltd is a wholly owned entity of RMIT. Its purpose is to advance education and life-long learning through online modern technology and pedagogy and to provide digital learning experience. It offers undergraduate, postgraduate, vocational and short courses of study.

Purpose and values

RMIT's mission is to help shape the world through research, innovation, quality teaching and engagement, and to create transformative experiences for students, getting them ready for life and work.

Our values inspire us, shape how we know and be on place, wherever we are in the world, and guide how we live and work together. RMIT's commitment to the expression of institutional values across our ways of working, being and knowing align with our modern slavery response.

Our values of *inclusion, imagination, agility, courage, passion* and *impact* inform and shape our commitment to identifying and addressing risk of modern slavery across our operations and contributing to global efforts to identify and address modern slavery obscured in supply chains.

Governance

RMIT University is governed by a Council that in 2020 consisted of:

- The Chancellor
- The Vice-Chancellor
- The Chair of the Academic Board
- Three persons appointed by the Governor in Council
- One person appointed by the Minister
- Four persons appointed by the Council
- One person elected by students
- One person elected by staff.

RMIT University was established and is governed in accordance with the Royal Melbourne Institute of Technology Act 2010 (Vic). The responsible Minister is the Hon. Gayle Tierney MP, Minister for Training and Skills and Minister for Higher Education.

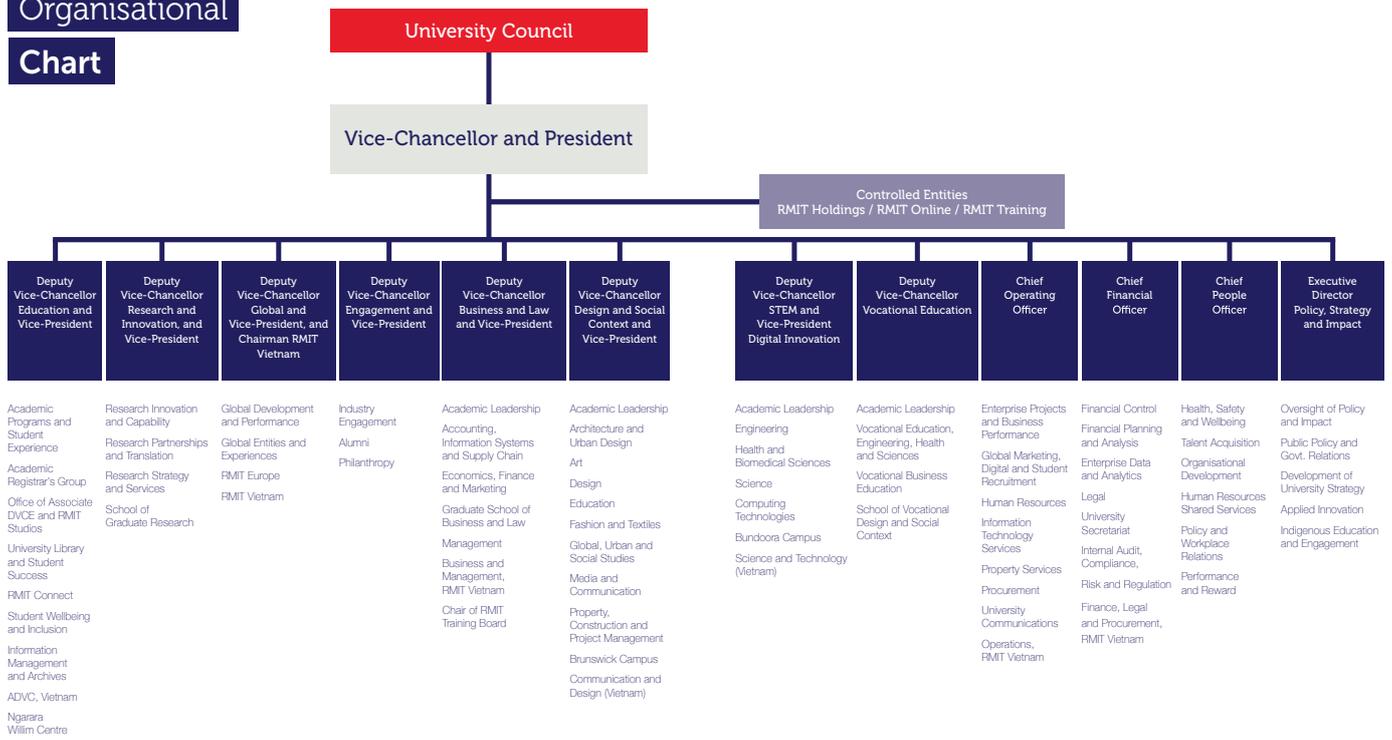
Consistent with the Act, the Council is RMIT's governing body and has responsibility for the general direction and superintendence of the University.

Council members participate in approval of the University's strategic direction, annual budget and Annual Operating Plan, and in monitoring the University's performance. The Council appoints the Vice-Chancellor and President.

Section 2

Our Structure, Operations and Supply Chains

Organisational Chart



RMIT's journey began in 1887 when Francis Ormond had a vision for helping workers acquire real-world skills, through a founding motto of 'a skilled hand, a cultivated mind'.

The people of Melbourne matched his enthusiasm to start a very practical place of learning where students would leave ready for employment. We still live this vision today – now on a global scale.

As society and the economy have become more sophisticated and complex, RMIT has grown and changed alongside. We are proud to have been part of key developments in work and industry since our inception. Now, RMIT is a multi-sector university of technology, design and enterprise with 95,000 students and almost 10,000 staff globally.

As at 31 December 2020, RMIT offered programs of study across four academic colleges:

- College of Business and Law
- STEM College
- College of Design and Social Context
- College of Vocational Education

RMIT's has eight research platforms (Enabling Capability Platforms – ECPs) that connect researchers from multiple disciplines and from across colleges under thematic umbrellas. This allows the University to deploy its areas of research excellence and strength to comprehensively address critical local, regional and global challenges and emerging opportunities.

RMIT has two campuses and a language centre in Vietnam and a research and industry collaboration centre in Barcelona, Spain. RMIT also offers programs through partners in destinations including Singapore, Hong Kong, Sri Lanka and mainland China, with research and industry partnerships on every continent.

Our deep connectivity with industry and hands-on partnerships with local and international firms inform our decisions and ensure an RMIT education opens doors and, through lifelong learning, reinvigorates careers. We can proudly say that we transform lives through education and research, contributing on a global scale.



System capability

The impacts of COVID-19 and subsequent changes to the way we work has highlighted the importance of strong digital infrastructure that is flexible and adaptable.

On 7 June, RMIT introduced a new system to support our people with smarter, simpler solutions by bringing together our people, finance and purchasing systems and processes on one integrated platform.

Through Project Pi, RMIT introduced Workday as a new procurement toolset for the University, streamlining the purchase-to-pay process to provide increased visibility and transparency of data, workflows and audit trails. Workday also provides more accountability and adherence towards system controls and compliance with university policies.

Workday has provided the Buying Desk with greater visibility on procurement transactions, spend reporting, purchasing and supply chain risk.

Supply chains

RMIT purchases a wide range of goods and services. Major areas of higher modern slavery risk in our supply chains include construction services and supplies, furniture and stationery, electronics (computers, audio visual, etc.), food and catering supplies, professional and travel services, laboratory supplies (equipment, chemicals, pharmaceuticals etc.), books and printing, and waste and recycling.

Initial screening has focussed on Tier 1 supplier expenditure from RMIT Australia, with intentions to expand our analysis across our supply chains. Figure 1 highlights the total number of Tier 1 suppliers, Figure 2 illustrates the number of suppliers by categories of spend, Figure 3 depicts overall spend, and Figure 4 highlights countries of spend.

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Figure 1: Tier 1 Suppliers (in 2020)

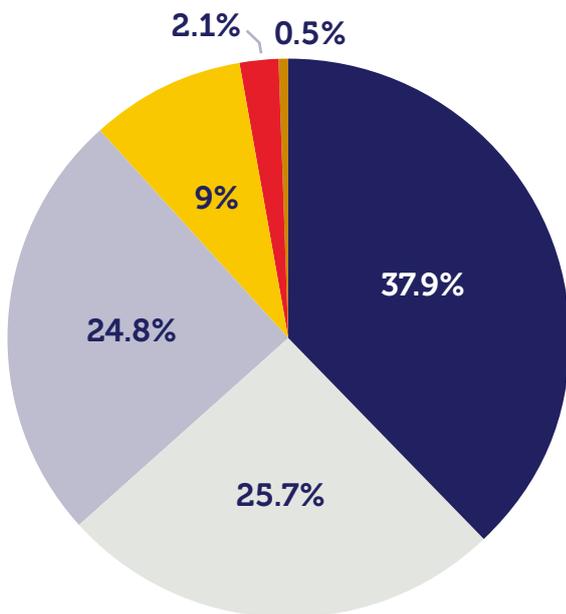


Figure 2: Number of Suppliers by Categories of Spend

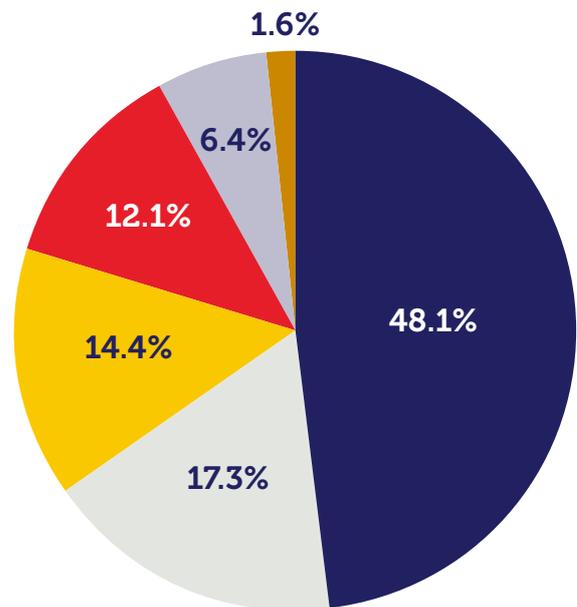


Figure 3: Overall Spend (in %)

Please note: Some suppliers provide goods and services in multiple categories of spend.



Countries of Spend

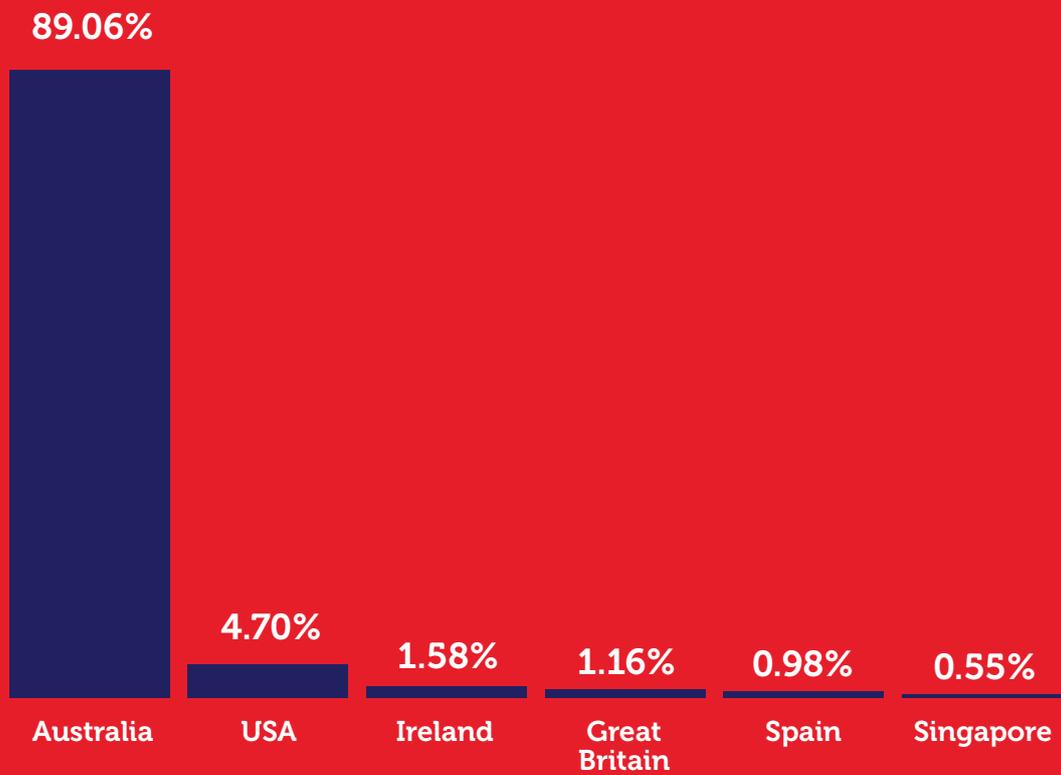


Figure 4: Top six countries of spend for Tier 1 suppliers (by %)

Section 3

Identifying our modern slavery risk areas

The summary below describes our initial process to identify and categorise modern slavery risk.

Our Modern Slavery Statement Working Group undertook a discovery project, which identified our key risks and priorities, and informed the action plan that guided our modern slavery body of work in 2020.

Informed by research

We draw upon research and good practice guides to inform our risk-based approach to identifying, assessing and addressing modern slavery risks in our supply chains and operations.

Our (anti) modern slavery work is focused on the risk to people of being caught up in modern slavery operations.

Our understanding of risk reflects Australian Government advice on modern slavery and understands risk of modern slavery as potential and actual risk. Implicit in this understanding is our responsibility to address instances of modern slavery.

Risk categories

Our assessment of high-risk modern slavery areas by sector, industry and location is outlined below. Geographical, political, governance and management, and existing corporate due diligence practices are also highlighted. Our findings are consistent with the Global Slavery Index and Australian Government advice.

High risk areas with relevance to RMIT's operations and supply chains

Sector and Industry

The table below highlights the sectors and industries relevant to RMIT that present a higher risk of modern slavery.

Goods	Electronics (including IT), textiles and clothing, food products (fishing, rice, cocoa), consumables (including office and laboratory supplies)
Services	Construction, cleaning, maintenance, catering, couriers, security

Location & Jurisdictions, Geographic and Political

The table below highlights legislation and principles relevant to modern slavery, as well as areas of focus.

Legislation	Human and labour rights, gender and anti-discrimination, child safety, modern slavery laws
Global and National Commitments	UN Guiding Principles on Business and Human Rights, UN Sustainable Development Goals, Principles for Responsible Investment (fund managers), RMIT Responsible Investment Principles
Areas of Focus	Known and emerging hot spots of labour and human rights, gender and child exploitation and abuse

Governance and Management

The table below highlights relevant organisational policies and processes. It also highlights operational activities that may pose a modern slavery risk.

Organisational policies and processes	<ul style="list-style-type: none"> • Labour and Human Rights • Whistleblower Procedure • Third Party Complaints • Sustainability Policy • Corporate Social Responsibility Framework • Procurement, supplier and vendor engagement • Compliance and Compliance Breach • Risk and Risk Acceptance • Delegation of Authority • Code of Conduct
Operational	Sub-contracting and third-party arrangements, multi-component reliance and manufacture branding

Visibility and existing corporate due diligence

The table below depicts sources which help guide and inform modern slavery risk assessment.

Data	Corporate due diligence sites, tools and access, data integrity, supplier tiers
Reports and Analysis	Global Slavery Index, COVID related alerts, media

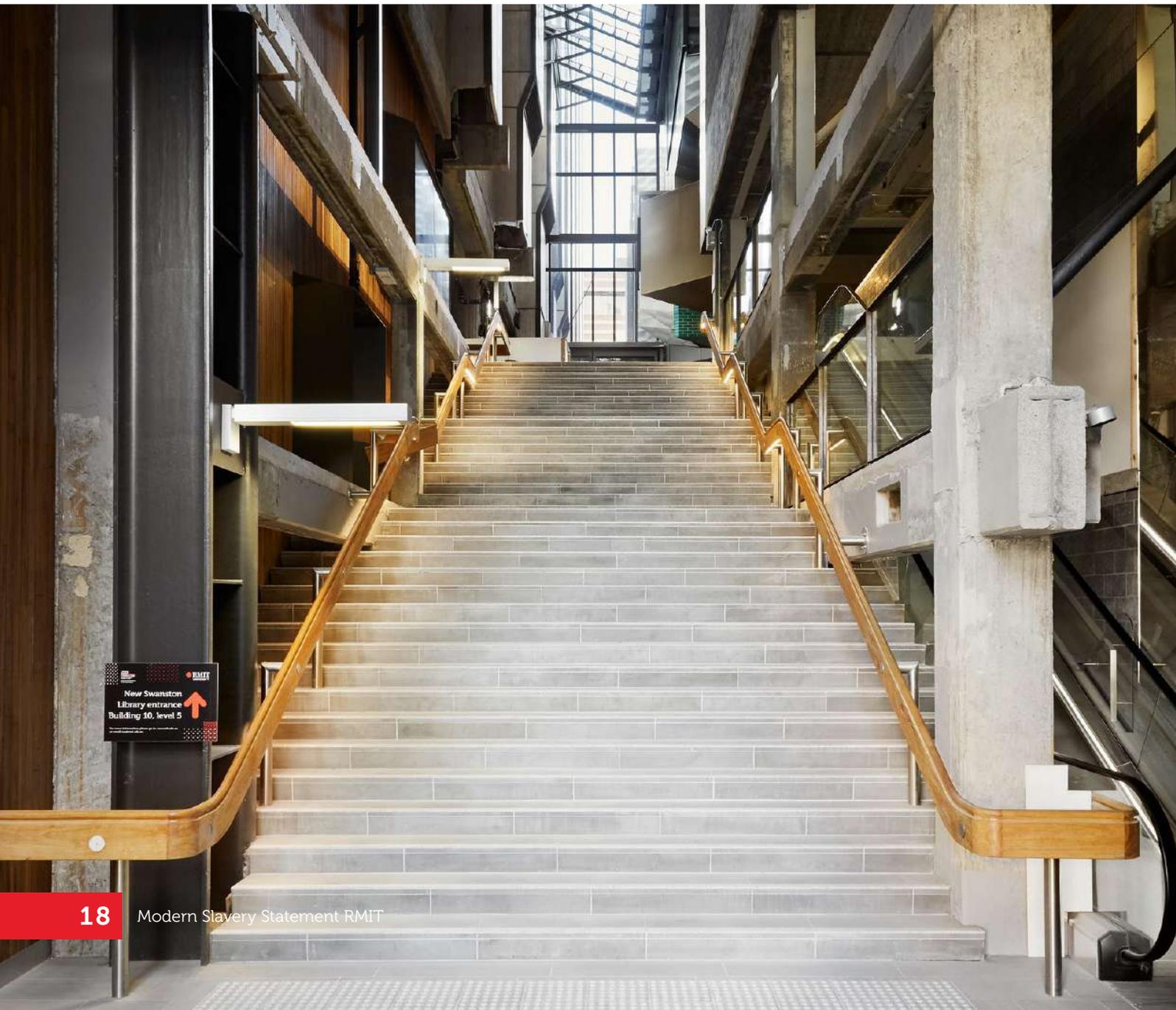
Additionally, our understanding of granular risk was supported by the embedding of modern slavery awareness in the risk analysis and recommendations of:

- RMIT's Sustainable Procurement Plan, as part of corporate social responsibility
- Student Life Portfolio Modern Slavery assessment focussed on risk across regular small spend items and sourcing.

Our risk assessment process identified priorities for action, which we detail in the next section. Our Compliance framework uses the Deming cycle of

plan, do, check, act, this iterative methodology is core to our modern slavery methodology and specifically reflects the ongoing risk awareness and risk mitigation journey.

We understand that modern slavery risk understanding is growing, and indeed that we are likely to deepen and widen our understanding of modern slavery risk as our work matures. This understanding is drawn from both modern slavery research, and the practical implementations of anti - modern slavery commitments in the UK experience.



New Swanston
Library entrance
Building 10, level 5

Section 4

Actions taken to assess and address risks including due diligence and remediation

Our Action Plan directed a wide range of actions to establish a baseline for modern slavery due diligence and support our ongoing maturation.

Our methodology and actions have not, so far, identified any instances of modern slavery.

Our key priorities in 2020

Priority	2020 Outcomes (specific to modern slavery)
Governance and Oversight	Working Group coordination: <ul style="list-style-type: none"> • Entities engaged • Action Plan • Project risk assessments • Oversight, tracking and supporting priorities
Policy and Process	<ul style="list-style-type: none"> • Code of Conduct • Compliance Policy and Breach Management Procedure • Risk Policy and Framework • Procurement Policy (in progress) • Supplier Code of Conduct and Corporate Social Responsibility Framework • Whistle-blower Procedure and disclosures portal • Employment and labour rights
Contractual clauses	Clauses relating to modern slavery inserted into contract templates
Due Diligence	<ul style="list-style-type: none"> • Initial supplier and vendor assessment of modern slavery risk • Corporate Social Responsibility Framework • Modern Slavery Risk assessment tool (to aid initial contract assessment)
System and Service development	New procurement process and systems (refer to 'Embedding due diligence and mitigation in core systems' section)
Training, awareness and engagement	<ul style="list-style-type: none"> • Briefing sessions, FAQs, resource identification and visibility • Victorian Universities Compliance Network briefings
Capability building	<ul style="list-style-type: none"> • Whistleblower and complaints • Global partnerships • Research contracts • Building upon risk assessment capability • Briefings and FAQs

The embedding of modern slavery due diligence into initial vendor and supplier screening is a significant part of our initial response. It gives us additional and appropriate oversight, builds capacity for data and interrogation, and will inform future development.

Assessing risk across supply chains and operations

Our 2020 focus was establishing upfront screening for modern slavery risk across vendors and suppliers. And, our approach has been initially, engagement focussed, in response to the challenges of response and establishment of our new data system and due diligence processes. Engagement precedes visibility, which underpins our risk assessment and treatment of modern slavery risk.

Screening has:

- Recognised very low inherent risk (e.g. public sector agencies)
- Initially assigned moderate and high risk ratings where response is incomplete or in process, for further engagement.

We note the impact of COVID-19 pressure in ours and our vendors operations, as well as the introduction of new processes and requirements and call out the relatively low response rate in this initial engagement. We are responding to this by developing a specific communication plan for our suppliers about modern slavery risk and our requirements to assess risk.

Our initial screening has focussed on Tier 1 suppliers, and so reflects predominantly Australian vendors and suppliers. This process demonstrates the complexity of supply chain analysis, as our Tier 1 suppliers have inherently lower levels of risk. We will utilise this insight and incorporate it into our next stage of modern slavery due diligence.

Finding modern slavery in our operations and supply chains

We have given thought to our response, should we identify modern slavery.

Our response is based on our existing business critical response maturity, and that education and engagement are key.

Additionally, RMIT provides support for educational access of victims of human trafficking in Victoria.

Additionally, we have a long and proud tradition of supporting educational access for students from disadvantaged cohorts.

Our methodology would follow the Deming cycle, consistent with our Compliance framework, and our integrity commitment.

We envisage this is an annual and continuous cycle of development and maturation.



Section 5

Assessing our Effectiveness

Our focus in 2020 has been on capability and capacity building to establish data and initial risk awareness and due diligence activities.

The significant activity is through the integration of due diligence activities in our supply chain and operations management. This will establish a foundation of evidence and data to monitor and assess the effectiveness of our modern slavery risk mitigation.

Our monitoring and reporting capacity are developing in 2021. Consistent with Australian Government advice we are developing capability in stages. Our initial focus is on understanding key risk and implementing initial due diligence across operations and supply chains. Sequentially, this focus will establish robust data, and support our ongoing analysis.

As noted above, our assessment of effectiveness is structured through our mature risk framework and compliance framework development, drawing upon the Deming cycle of Plan, Do, Check, Act as we cycle through development, implementation, analysis and improvement.

We have assessed key risks and treatments each quarter and aligned this assessment with quarterly updates against our Modern Slavery Action Plan through 2020.

We have implemented processes to monitor the effectiveness of our actions, and to support assessment:

Modern Slavery Working Group

Provides a forum for key stakeholders (business areas, Entities, Policy, Legal, Procurement, Risk) and has been fundamental in engaging with entities to support a common approach and capability for modern slavery response.

Action Plan

Quarterly updates and tracking against actions, at a minimum, and sprint break out groups.

Capability building

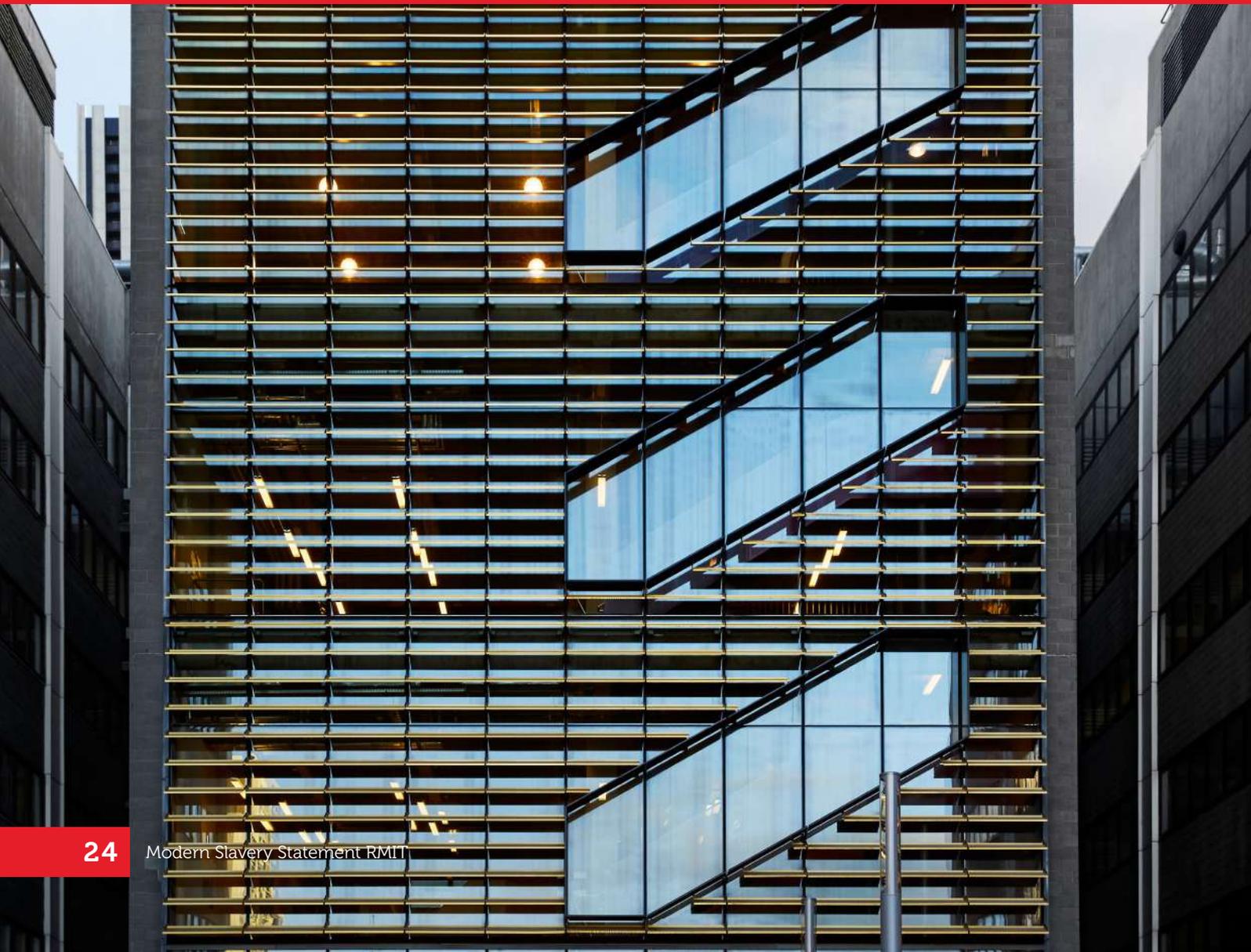
Awareness and appetite for more information are indicators of engagement.

Training and briefing sessions, development of targeted resources.

Resources to support operational effectiveness were identified in 2020.

Governance and reporting

Regular updates to our Audit and Risk Management Committee

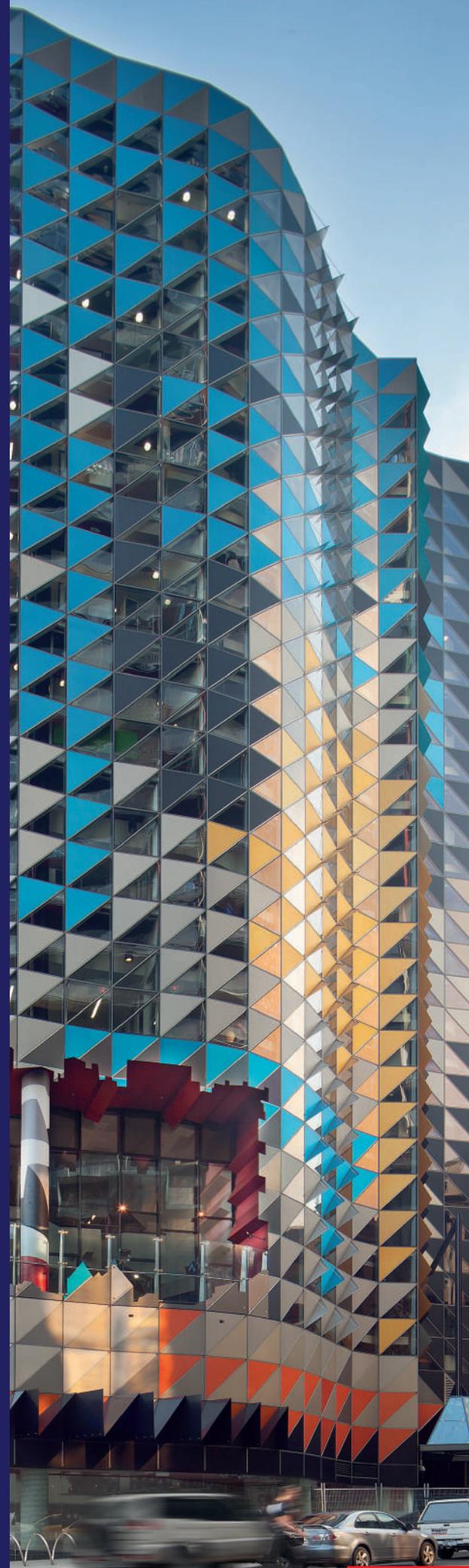


Section 6

Consultation with Entities

The RMIT Group includes RMIT University, RMIT Vietnam, RMIT Europe, RMIT Training, and RMIT Online. The governance and alignment of the operations of controlled entities within a consistent governance and policy structure has been established. This model supports not just consultation, but alignment and consistency of modern slavery response and actions across controlled entities.

RMIT Vietnam, RMIT Europe, and RMIT Training have stakeholder positions in our Modern Slavery Statement working group. The operations and supply chain exposure of RMIT Online are consolidated within our central procurement leadership.





Section 7

Other Information

We take our modern slavery diligence and mitigation responsibilities seriously and relish the alignment of this requirement with our own values and strategy. Our purpose gives us an additional understanding of responsibility to combat modern slavery through our global reach, our sphere of influence, research and training that prepares students for work around the globe.

Our focus in 2021- 2022 reflects this context. We aim to iteratively refine, deepen and widen modern slavery response, focussing on our:

- Capability and due diligence in vendor engagement and management
- Awareness raising
- Supply chain mapping
- Data and indicators of effectiveness
- Deepening our risk understanding across relevant operational areas
- Engagement and awareness across our staff, student, partner and supplier cohorts.

RMIT's mission and values drives commitment to our modern slavery journey. In this foundational stage we have come to understand the urgency, and the complexity of addressing modern slavery, and our responsibility to address it. We look forward to reporting on the depth and breadth of our progress in June 2022.

RMIT exists to create transformative experiences for our students, getting them ready for life and work, and to help shape the world with research, innovation, teaching and engagement.

We do this by bringing the talents of our staff and students together with industry and the community to renew ourselves through teaching, learning, research and collaborative innovation, all supported by new technology. And by building on what we have achieved and embracing the possibilities of digital, economic and social transformation to shape the future in a way that no other university can.



What's next...