

Modern Slavery Statement 2025

Acknowledgement of Country

RMIT University acknowledges the people of the Woi wurrung and Boon wurrung language groups of the eastern Kulin Nation on whose unceded lands we conduct the business of the University. RMIT University respectfully acknowledges their Ancestors and Elders, past and present. RMIT also acknowledges the Traditional Custodians and their Ancestors of the lands and waters across Australia where we conduct our business.



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Vice-Chancellor's statement



At RMIT, we continue to take our responsibility as a substantial and international university seriously. Everyone deserves opportunity and this perspective is embedded in the way we operate and the contribution we aspire to make. We strive to role model good practice and to do everything we can to eliminate the presence of modern slavery across our operations and supply chains. During 2025, guided by our Modern Slavery Roadmap, we further refined and strengthened our approach.

We collaborated with 'Educating for Change', the modern slavery awareness program for our sector, to make a new suite of learning modules available in our staff development platform. The Fraud and Corruption Control Policy suite also completed its major review, ensuring RMIT's management and corporate governance framework reinforces our stance against any enablers for modern slavery. At all times, we hold our suppliers and partners to the same standards we set for ourselves, and leverage our collaboration with the Australian Universities Procurement Network (AUPN) Anti-Slavery Program to support this purpose.

Importantly, we also recognise the power of partnerships in driving meaningful and lasting change; there are a range of examples outlined in this report. By working collaboratively across sectors and disciplines, we can amplify our impact and contribute to systemic improvements in policy and practice. A standout example is RMIT's Centre for Business and Human Rights, Australia's first and only research centre dedicated to this field and the only centre of its kind in the Asia-Pacific region.

Through multi-disciplinary research, broad stakeholder engagement and education, the Centre advances thought leadership to ensure businesses understand, respect and practice human rights. In August 2025, the Centre hosted the inaugural United Nations Business and Human Rights Regional Forum: Australia and New Zealand. This landmark event demonstrates the influence of collective action and reinforces the role we can play in shaping national and international dialogue.

At RMIT, we stand together against modern slavery. Galvanised by our civic purpose and guided by our world-leading expertise in human rights, we work to improve life and living in the communities we exist to serve; with dignity, freedom and fairness at the heart of that worldview.

A handwritten signature in black ink that reads "Alec Cameron".

Professor Alec Cameron
Vice-Chancellor and President

About this statement

This is RMIT's sixth Modern Slavery Statement (Statement) under the *Modern Slavery Act 2018 (Cth)* (the Act) and covers the 2025 calendar year.

In responding to our reporting obligations under the Act, this Statement describes:

- RMIT's structure, operations and supply chains
- our consultation processes with RMIT's controlled entities
- potential for modern slavery risks across our operations and supply chains
- actions taken to assess and address risks of modern slavery across our operations and supply chains
- how we assess the effectiveness of our actions.

The reporting entity for this Statement is the Royal Melbourne Institute of Technology (ABN 49 781 030 034, trading as RMIT University) (RMIT). RMIT is the parent entity of the following wholly owned and controlled entities:

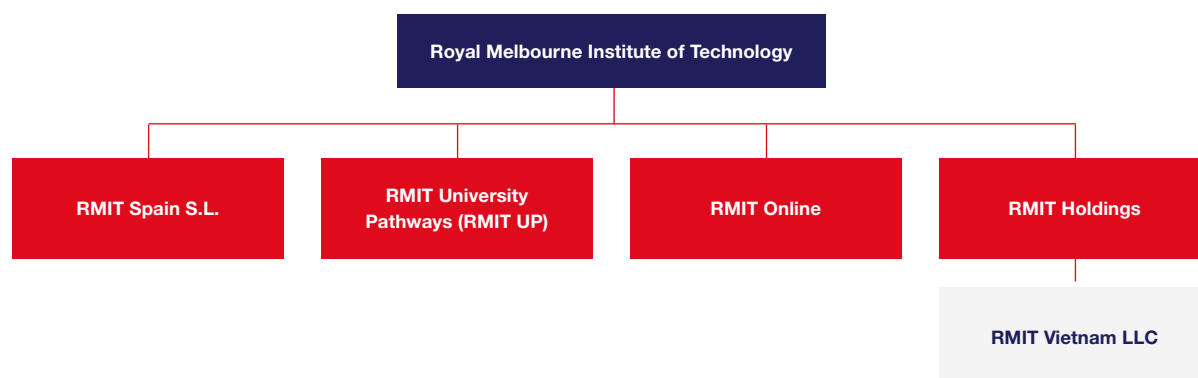
- RMIT Holdings Pty Ltd
- RMIT University Vietnam LLC (RMIT Vietnam)
- RMIT Spain S.L. (RMIT Europe)
- RMIT Online Pty Ltd
- RMIT Training Pty Ltd (trading as RMIT University Pathways/RMIT UP)

These entities are primarily based in Australia, Spain, and Vietnam, and consist of all RMIT's wholly owned and controlled entities under the Act (further details about these entities are set out in Appendix 1).

RMIT's controlled entities are all governed by a Board of Directors and are focused on supporting important strategic initiatives in pathways, online, and international operations. Financial performance is reported regularly, and operational highlights and risk management are reported at least annually to RMIT University Council.

All entities were involved in the drafting of this Statement and the development of the RMIT Modern Slavery Roadmap to ensure the modern slavery risks related to their operations and supply chains are fully understood and appropriately reflected in this Statement.

As required by the Act, RMIT's 2025 Modern Slavery Statement was endorsed and approved by the RMIT Council on 11 June 2026.



Introduction

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RMIT recognises modern slavery risk as a complex global human rights issue, and we continue to pursue the elimination of modern slavery across our operations and supply chains. This Statement outlines our work during 2025 to assess and address modern slavery risks as we continue to enhance our modern slavery response.

‘Modern slavery’ describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

It is important to emphasise that modern slavery is only used to describe serious exploitation that involves the loss of freedom. Modern slavery does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal, harmful, and may be present in some situations of modern slavery.

The University’s understanding of modern slavery risk areas considers a number of factors and assesses inputs from a range of sources. Our approach is informed by expert business and human rights advisors, the UN Guiding Principles on Business and Human Rights (UNGPs), the Global Slavery Index, government advice, and ongoing developments in modern slavery risks and issues both globally and in Australia.

Our key areas of potential risk relating to modern slavery are:

- third-party partnerships
- staff
- students
- supply chains (labour and materials).

As a signatory to the **UN Global Compact**, RMIT must operate in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights (including modern slavery), labour, environment and anti-corruption. RMIT’s awareness and actions to address modern slavery are maturing, and we continue to strengthen our approach each reporting period.



About RMIT

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RMIT is an international university of technology, design and enterprise with more than 104,000 students and over 13,000 staff globally. We empower people and communities to adapt and thrive across generations, with education, research and civic engagement that are applied, inclusive and impactful. Postgraduate, undergraduate, vocational education, foundation studies and online programs offer students a variety of work-relevant pathways.

Our three substantial campuses in Melbourne are located in the City, Brunswick and Bundoora, along with other Victorian locations. We also have two campuses and an English language centre in Vietnam and a research and innovation hub in Spain. In addition, programs are offered through partners in Singapore, Hong Kong, Sri Lanka, Indonesia, India and China, with research and industry partnerships across the globe.

Strong industry connections, forged over 138 years, remain integral to RMIT's leadership in education, applied and innovative research, and to the development of our graduates as skilled global citizens. This is why our alumni community is known for being highly employable and ready to adapt in complex times.

Alongside industry-relevance, creativity and inclusivity are hallmarks of an RMIT education. Our diverse global community of 560,000+ alumni live, work and contribute in more than 153 countries around the world. Recognising that education is lifelong, many also return throughout their careers to refresh and update their skills or change career direction altogether.

We celebrate our multicultural and multifaith environments, knowing that many voices and views are part of the learning experience. Ensuring every member of our University feels welcome and supported to learn and thrive is a priority, which means respect is at the core of everything we do.

As a collective and as individuals, we commit to respectful ways of working and understanding that acknowledge the experience, history and knowledge of Aboriginal and Torres Strait Islander peoples. We actively strengthen relationships between Indigenous and non-Indigenous peoples for the benefit of all Australians and the communities in which RMIT operates.

For more information, visit rmit.edu.au/about

Governance

RMIT University was established and is governed in accordance with the Royal Melbourne Institute of Technology Act 2010 (Vic). The responsible Minister throughout 2025 was the Hon. Gayle Tierney MP, Minister for Skills and TAFE and Minister for Water.

RMIT Council

The RMIT Council is the governing body that has overall responsibility for the general direction and superintendence of the University.

In 2025, the RMIT Council 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 and from students, and one person elected by and from staff.

Its primary responsibilities include setting the strategic direction and financial plans, monitoring University performance, ensuring effective risk management, overseeing academic activities, and monitoring major strategic projects.

Council held six meetings in 2025, including two strategic workshops. The primary focus for Council was on monitoring progress against Horizon 1 of RMIT's Strategic Plan, Knowledge with Action, and establishing the goals and ambitions for Horizon 2.

RMIT is committed to the University Chancellors Council Voluntary Code of Governance Principles and Practice for Australia's Public Universities (The Code). The Code was amended in December 2024 to align with best practice for governance in Australia and the Australian Universities Accord.

Council has three standing committees. The Audit and Risk Management Committee; the Nominations, Remuneration and People Committee; and the Infrastructure, Information Technology Committee. These Committees provide advice, make recommendations, and where relevant, exercise delegated powers and report on these to Council.

- **Audit and Risk Management Committee (ARMC)**

ARMC provides independent assurance regarding the University's risk, control and compliance frameworks and has oversight of its financial affairs, including statutory financial reporting. It is responsible for oversight of both the Internal Audit and External Audit functions. The ARMC holds the Council's responsibility for oversight of modern slavery risk management practices.

- **Infrastructure and Information Technology Committee (IITC)**

The purpose of the Infrastructure, Information and Technology Committee (IITC) is to provide oversight of key Infrastructure and Information Technology strategies and monitor key strategic projects to ensure they produce measurable benefits for the University.

- **Nominations, Remuneration and People Committee (NRPC)**

NRPC has oversight of the appointment and remuneration of senior staff, Council members, and directors of controlled entities. It is responsible for the awarding of Honorary Degrees and for monitoring progress against key elements that make up the People Strategy, Audit and External Audit functions.

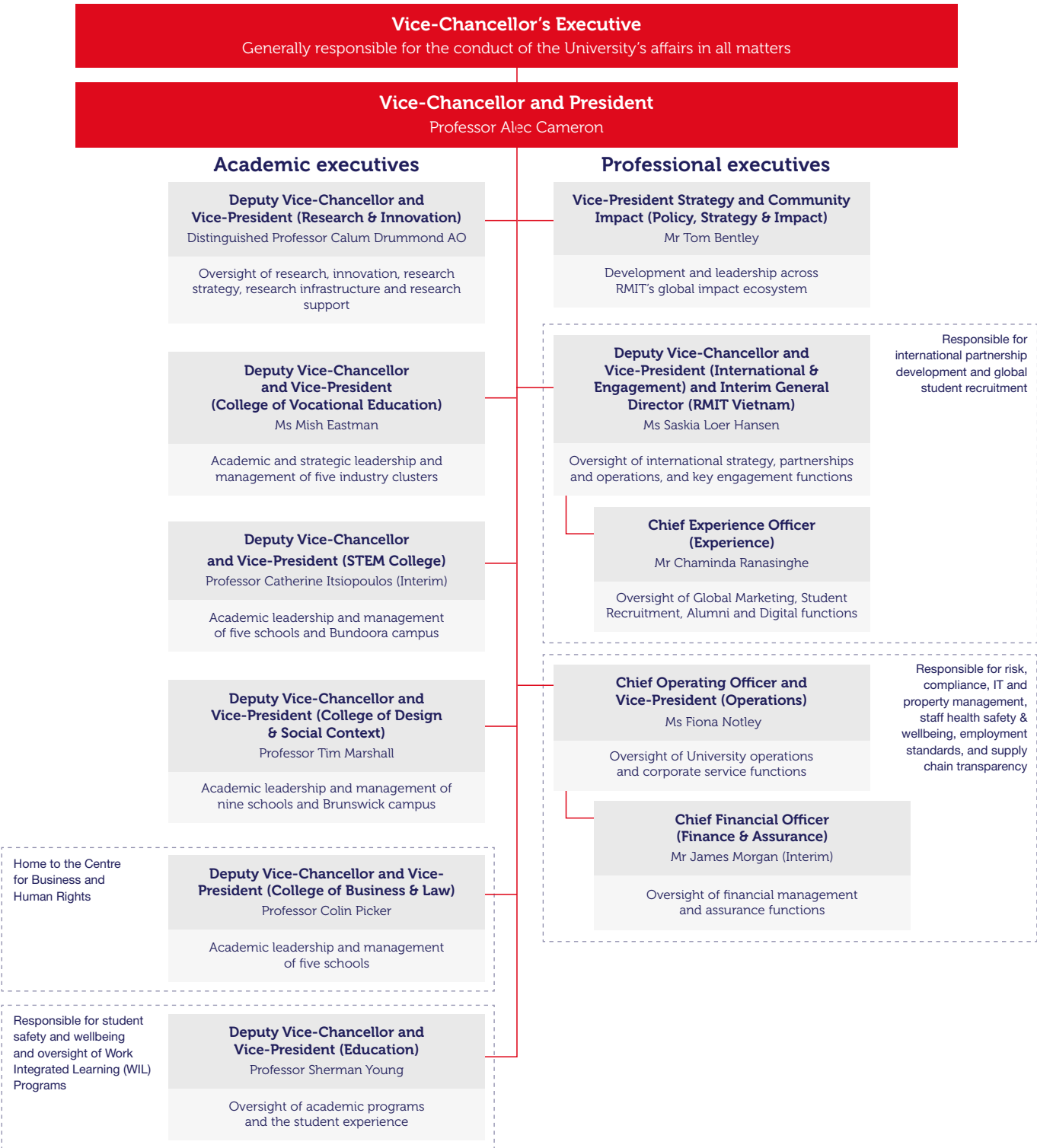
University Structure

Led by our Vice-Chancellor and senior executives, our structure is comprised of several operational portfolios, as well as academic colleges and schools.

For more information on the RMIT Governance Structure, see the [2025 Annual Report](#).

RMIT 2025 Organisational Structure

RMIT, its people, its partners and supply chain all have a role in addressing modern slavery. The diagram below highlights key areas of responsibility across our functional organisational chart.





Our compliance landscape

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Policy

Our policy approach is guided by an enterprise-wide Policy Governance Policy (PGP), which describes the processes for developing, approving, reviewing and maintaining policy documents at RMIT. The PGP applies to all policy documents developed for and on behalf of the University and its controlled entities and is intended to fulfil the following objectives:

- articulate how RMIT complies with legislative and regulatory obligations
- support the implementation of RMIT's strategic objectives and operational and academic plans
- reflect RMIT's cultural and organisational values
- embed delegations of authority and the limits of those
- reduce organisational risk, and
- enhance both academic and research integrity.

RMIT has committed to addressing modern slavery and broader human rights risks in all relevant policies.

Policies are subject to a major review at least every five years, or more frequently where changes to legislative or other requirements necessitate a review. Policies apply to the RMIT Group, which is RMIT University and its controlled entities. Localisation of policies is supported by procedures or other policy documents.

The table below outlines policies that either directly link to our approach to managing modern slavery risks or provide a governance mechanism through which modern slavery can be addressed.



Policy	Context and relevance to modern slavery
<u>Code of Conduct</u>	Provides guidance and defines the enforceable standards for our ways of working, ways of knowing and ways of being. The Code is about how RMIT staff work as a community of professionals, academics, education practitioners and researchers. RMIT is a values-based organisation, and all staff are expected to practice our RMIT core values of inclusion, imagination, integrity, courage, passion and impact. These values inspire staff and help them to make RMIT a positive force for social and environmental change, and guide how staff work together, wherever they are in the world. The Code, which had a major review in 2025, sets the standard for ethical behaviours, essential for guiding our culture and attitude towards the elimination of modern slavery.
<u>Compliance Policy</u>	This policy affirms RMIT's commitment to compliance management and outlines the framework and objectives for managing compliance obligations. It promotes a positive compliance culture that fosters ethical conduct and supports good governance and operational excellence at RMIT. Compliance management involves identifying, implementing, assessing and reviewing compliance with obligations, including the <i>Modern Slavery Act 2018</i> (Cth). To effectively address the pace of change in an evolving regulatory environment, compliance management is continuous and timely. This approach supports decision-making and management practices and integrates with the RMIT risk management framework. The Policy and the supporting Compliance Procedure and Compliance Breach Management Procedure set out the rules and requirements for maintaining compliance with relevant obligations. Outlining RMIT's approach to managing compliance, defining relevant terms, roles, responsibilities and embedding a positive compliance culture.
<u>Complaints Governance Policy</u>	Sets out the principles and governance framework that inform our approach to complaint handling. ▪ To promote a culture where complaints are welcomed as an important component of our commitment to an inclusive, professional and productive work, research and learning environment. ▪ To establish the principles and governance framework that inform the RMIT Group's approach to complaint handling. ▪ To ensure complainants are treated with procedural fairness and respect. <u>Third-Party Complaints Procedure</u> This procedure applies to any third party wishing to make a complaint or raise a concern about any aspect of the operations and business activities of the RMIT Group. A third party, for the purposes of this procedure, is any person not eligible to raise a complaint under the various staff and student policies and procedures. Authority for this document is established by the Complaints Governance Policy
<u>Controlled and Non-Controlled Entity Policy</u>	Establishes the governance framework for the University's controlled and non-controlled entities to ensure the University operates in accordance with its obligations under the RMIT Act and that the RMIT University Council has appropriate oversight of all functions and activities conducted by entities.

Policy	Context and relevance to modern slavery
<u>Fraud and Corruption Control Policy</u>	The purpose of this policy is to encourage the highest level of integrity in organisational culture as an essential part of RMIT's management and corporate governance framework. The policy aims to promote a culture of honesty, integrity and professionalism, and reflects RMIT's commitment to effectively prevent, detect and respond to fraud and corruption risks. This policy defines the illegal or unacceptable, high-risk behaviours that constitute corruption and fraud, and reinforces RMIT's position of no tolerance for such conduct. Corruption and fraud can be enablers for modern slavery. The Fraud and Corruption Control Policy suite completed its major review in 2025. <u>Whistleblower Procedure</u> This procedure provides a way for anyone to report concerns they may have about illegal, unethical or improper conduct involving RMIT or its staff, Council members, students or researchers while providing protection to the person making the report. It does not replace existing complaints, conduct or compliance policies but provides an additional avenue for matters to be raised in relation to specific types of conduct. Authority for this document is established by the Fraud and Corruption Control Policy.
<u>Inclusion, Diversity and Equity Policy</u>	Sets out our commitment to providing an accessible and inclusive learning and work environment that promotes diversity, inclusion and equal opportunity and is free from discrimination, sexual harm, victimisation and vilification.
<u>Procurement and Expenditure Policy</u>	Ensures all procurement and expenditure activities support RMIT's strategic objectives, comply with legislative and regulatory requirements, and include consideration of quality, service, environmental and social impacts. Making explicit reference to the <i>Modern Slavery Act 2018</i> (Cth), this policy strengthens oversight of the RMIT-controlled entities to ensure greater compliance, risk management and governance.
<u>Risk Management Policy</u>	Sets out the key principles and expectations to support the effective management and oversight of risks to the RMIT Group strategy, objectives, and activities, and promote transparency and integrity in the RMIT Group decision-making processes.
<u>Supplier Code of Conduct</u>	Outlines our minimum requirements regarding the conduct of our suppliers of goods and services in the areas of labour and human rights, protection against modern slavery, environmental management, health and safety, corporate governance, and ethical business practices.

Policy

Context and relevance to modern slavery

Sustainability Policy

Articulates RMIT's commitment to advancing its sustainability ambitions as an organisation that models institution-wide excellence. Ensuring our strategies, processes, supply chains and partnerships meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption to achieve a culture of integrity. The policy explicitly requires RMIT to assess and address the risks of modern slavery in our operations and supply chains through due diligence and remediation processes, as well as implementing tools to assess the effectiveness of these actions.

Corporate Social Responsibility Framework

The framework, an asset under the Sustainability Policy, provides a screening methodology and a range of tools to identify individuals, businesses or organisations that may pose an ethical or reputational risk to the University. Allows us to implement appropriate risk mitigation and meet our CSR obligations as a signatory to the Compact.

Third-Party Educational Delivery Policy

This policy and its associated processes establish the principles for the delivery of RMIT programs and courses by third-party providers. It ensures that RMIT complies with relevant Australian and foreign jurisdiction (where applicable) legislation, regulatory requirements and standards for all programs being delivered through third-party arrangements and has responsibility to ensure that third parties comply with all legislative and regulatory requirements, including the *Modern Slavery Act* and broader human rights due diligence.



Risk Management

RMIT's risk management framework establishes a systematic process of identification, management and monitoring of risk. RMIT fosters a positive risk-aware culture. Risk is everyone's responsibility and is embedded in the way work is conducted across all RMIT Group academic, research and non-academic operations. It encourages open and transparent discussion about risk and opportunity.

The framework is supported by:

- A defined Risk Management Policy based on ISO31000:2018 Risk Management, that articulates RMIT's approach to risk management and the key principles and responsibilities to facilitate the effective management of risks.
- Council-appointed Audit and Risk Management Committee (ARMC), which regularly monitors and reports on the adequacy of arrangements in place to ensure that risks are effectively managed and reflective of the strategy across the group.
- An annual review and update of the RMIT Risk Appetite Statement.
- Active management and monitoring by all Colleges, Portfolios and Controlled Entities of their risk profiles to ensure that appropriate mitigation measures are in place and risk exposures remain consistent with RMIT's objectives.
- Provision of risk management support, advice, assessment tools and training for RMIT staff.
- Execution of the annual internal audit plan, which is primarily concerned with evaluating the effectiveness of internal controls and is risk-based, to place greater emphasis on those areas of higher risk to RMIT.
- An insurance program that protects RMIT from financial impacts as a result of physical loss of, or damage to, assets and activities, as well as injuries to RMIT staff, students and third parties.

Modern slavery risks within the University's operations, entities and supply chains are considered in numerous risk domains, including sustainability, property, education, technology and procurement risk domains.

The Risk Appetite Statement (RAS) specifies the amount of risk the RMIT Group is willing to seek or accept in pursuit of its strategic objectives and delivery of its annual Operating plans. The Statement sets the tone within which the RMIT Group would prefer to conduct its activities. Risk appetite applies to the management of existing activities, as well as seeking out new opportunities or changes in and to its existing operations.

The RAS contains several risk tolerance statements which support the University's response to human rights and modern slavery, including alignment to values, third party screening and compliance.

Subject matter experts across the University continually engage with key external sources, external advice and peer practice to inform their active management and review of key risks.

RMIT has a formal Risk Champion Network to complement the provision of risk management support, advice, assessment tools and training for staff. Risk Champions are appointed representatives from each College, Portfolio and Controlled Entity, and are responsible for coordinating the adoption and implementation of risk management activities within their respective areas.

Risk Champions promote risk management practices, identify opportunities for improved risk management, and help ensure prompt action on identified risks. They act as key liaison points with the Enterprise Risk Management team, tailoring and translating risk tools to suit the nature of activities in their area and integrating these tools into business processes. They support their business area in applying enterprise-wide risk management processes with the aim of increasing awareness, ownership and effective management of risks.

Third Party Due Diligence

Third parties can be engaged by RMIT for numerous reasons and through varied pathways. Examples of third parties include new suppliers, new research partners, new Work Integrated Learning (WIL) partners and new philanthropic partners. It is critical that any risks introduced by these third parties are evaluated in a timely and accurate manner utilising the input of all relevant subject matter experts and a consistent risk assessment methodology.

Throughout this Statement, due diligence processes are outlined to demonstrate how modern slavery risks are screened and managed by a range of functional areas.

Assessing Partnerships

RMIT assesses proposed partnerships using a structured due diligence approach to identify, evaluate and manage potential risks to the University, its people, and its reputation. This includes risks relating to legal and regulatory compliance, fraud and corruption, and potential foreign interference, as well as modern slavery and human rights, and sustainability.

Due diligence is undertaken in accordance with RMIT's Risk Management Policy and Procedures and the RMIT Group Risk Appetite Statement, considering factors such as the nature of the partnership, geographical location and the activities being undertaken. This approach is aligned with RMIT's values, legal and regulatory obligations, and Corporate Social Responsibility commitments, and draws on a range of inputs, including publicly available information, country-level risk indicators, specialist reports, partner disclosures, and input by RMIT subject matter experts.

Where relevant, modern slavery risk considerations are embedded within broader risk and compliance assessments rather than treated as a standalone issue, ensuring they are considered alongside ethical, legal, compliance, environmental, and reputational risks throughout the partnership lifecycle. RMIT engages with its flagship offshore delivery partners in relation to Modern Slavery matters and incorporates information on RMIT's approach to complying with the *Modern Slavery Act* requirements into partnership agreements via the content included in the RMIT International Partnership Delivery Hub.

Stakeholder engagement is a core component of RMIT's partnership due diligence, recognising that effective risk management requires collaboration across RMIT University and, where appropriate, with external stakeholder consultation.

Relevant internal teams are engaged to contribute expertise on risk, legal matters, sustainability, foreign interference, procurement, student safety and wellbeing, and people practices, supporting a holistic, enterprise assessment of potential risk impacts and mitigation options. Where risk concerns are identified in relation to labour standards, human rights policies, or remediation processes and procedures, additional engagement with prospective partners may be undertaken to seek further information, clarification, and assurance. This collaborative approach supports informed decision-making, enables a shared understanding of expectations, and reinforces RMIT's commitment to responsible partnerships that respect human rights and actively seek to prevent and reduce modern slavery risks.

Modern Slavery Roadmap

The Sustainability Committee has the responsibility and operational oversight for the coordination of sustainability initiatives across all areas of the University. Its goal is to ensure sustainability principles and practices are embedded within the University's core teaching and learning, research, governance and operational activities.

The Sustainability Committee reports through the Chair (the Deputy Vice-Chancellor, Education) to the Vice-Chancellor's Executive on the University's sustainability performance and makes recommendations about sustainability-related commitments, policies, planning and partnerships. It is also responsible for oversight of the University's commitment to the UN Sustainable Development Goal and compliance with the *Modern Slavery Act*.

Action across the University is guided by the RMIT Modern Slavery Roadmap, aligned with the expectations for businesses to respect human rights set out in the UN Guiding Principles on Business and Human Rights (UNGPs). The roadmap identifies a suite of applied practical actions the University can take over the short, medium and long term to further improve and refine our modern slavery risk management.

The actions were developed through consultation with key business units and sit across the following categories:

- policy commitment
- identifying and assessing risks
- integrating responses and addressing risks
- tracking effectiveness
- communicating actions, and
- grievance mechanisms and remediation.

The Sustainability Committee actively monitors this work and has been engaging with subject matter experts from across the University and with external human rights experts to support the implementation.





Our people

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Staff

RMIT employs just over 13,000 staff globally, comprising a workforce of professional and academic staff. Our strength lies in the diversity of our community, along with the values that unite us. We are proud to be an institution that welcomes people of all backgrounds, cultures and faiths, with respect and inclusion considered fundamental.

Australia

Australian onshore staff, including those employed by RMIT University, RMIT UP (RMIT Training) and RMIT Online, are based at one of our three campuses in Melbourne – Melbourne City, Brunswick and Bundoora. The majority of RMIT University and RMIT UP staff are covered by Enterprise (Collective) Bargaining Agreements. At RMIT University, the *RMIT University Enterprise Agreement 2024* applies to academic and professional employees, and the *RMIT University Vocational Education Enterprise Agreement 2024* applies to vocational education teachers and senior educators. RMIT Online is subject to modern award coverage but typically pays higher rates to attract and retain staff.

At RMIT Training, most employees are subject to either the *RMIT Training & NTEU Enterprise Agreement 2023* or the *RMIT Training Foundation Studies Enterprise Agreement 2019*.

As at 31 December 2025, RMIT's Australian entities had 4,687 continuing, 1,372 fixed term and 5,883 casual staff.

In terms of gender breakdown RMIT's Australian entities are represented by 6,501 females (54.4% of headcount), 5,276 males (44.2% of headcount) and 165 other gender categories (1.4% of headcount).

When considering worker types across RMIT's Australian entities, 6,160 were academic staff teaching in higher education, undertaking research and engaging with industry, 1,137 were vocational education teachers, and 4,645 were professional staff supporting both the operation of the University, and academic and vocational education activities.

Vietnam

RMIT Vietnam operates across three locations: with campuses in Ho Chi Minh City (Saigon South) and Hanoi, and an English Language Centre in Danang.

RMIT Vietnam's workforce is comprised of two employee types, definite (fixed term) and indefinite (continuing), in accordance with the Vietnam Labour Code 2019. Fixed term and continuing are salaried staff while our casual employees are paid an hourly rate.

As at 31 December 2025, RMIT Vietnam had 397 continuing, 631 fixed term and 291 casual staff.

Europe

At RMIT Europe (based in Barcelona, Spain), 49 employees in Spain were engaged as either permanent/ongoing, training contracts, or under internship agreements. All employment contracts are issued in accordance with the Spanish National Collective Agreement for Private Universities and in compliance with Spanish labour laws, under which very few situations for temporary employment are allowed.

Area of risk

The inherent level of modern slavery risk within our operations for directly employed staff in Australia is deemed low, given the workplace protections in place that comply with applicable labour rights legislation and the types of roles typically undertaken by our people. A comparable approach is taken for our staff in Vietnam and Spain.

Information on the protections in place for our workforce is described in the following section.

Actions taken

- With the exception of a small number of very senior executives, Australian onshore employees are covered by either an applicable Enterprise Agreement or the relevant modern award, and we work to ensure compliance with our obligations under relevant employment legislation, such as the *Fair Work Act 2009* (Cth).
- Labour contracts for RMIT Vietnam's employees are prepared by our People Team (Human Resources) using templates created in accordance with the prevailing Labour Code and reviewed by an independent legal advisor. All agreements comply with Vietnam labour rights legislation, including the labour code, statutory insurance and tax laws. We continue to provide worker benefits that exceed legislative requirements under the Vietnam Labour Code 2019.
- RMIT Spain's employment contracts are prepared by a third-party provider, and all current contracts have been prepared in accordance with the Spanish National Collective Agreement for Private Universities and are compliant with Spanish labour laws. Due to recent legislative changes in Spain, RMIT Spain can only issue temporary employment contracts for very limited reasons, e.g. maternity leave cover.

Online Modern Slavery Awareness Training Modules

RMIT partnered with the **Australian Catholic Religious Against Trafficking in Humans** (ACRATH) to launch a suite of modern slavery awareness modules.

Through RMIT's participation in the Australian Universities Procurement Network (AUPN), RMIT was introduced to the ACRATH 'Educating for Change' awareness raising initiative to address modern slavery in Australian universities. ACRATH, Flinders University, and the University of South Australia collaborated to develop six free online modules designed for university staff and students. The modules aim to equip current and future professionals with the skills to identify and combat modern slavery in their fields.

The training modules have been integrated into RMIT's learning platform to equip staff with the knowledge and tools to identify, address, and support in the remediation of modern slavery risks.

The training includes two core modules, which all staff are encouraged to complete, particularly those in student-facing roles or roles that interact with suppliers:

- Introduction to modern slavery
- Modern slavery in university settings

Four additional modules are available for specific discipline areas – these are recommended for educators, academics and professional staff in colleges:

- Modern slavery in school settings
- Modern slavery in social work settings
- Modern slavery in legal and criminal justice settings
- Modern slavery in healthcare settings

Students

In 2025, RMIT had over 104,000 students enrolled globally.

Beyond involvement in their course of study, our student population may be engaged in other activities, either as a component of their study or as volunteering. This may include involvement in Work Integrated Learning (WIL) programs, work experience, internships or volunteering. Volunteering can include participation in one of our clubs, societies, collectives or as part of a community project or event.

RMIT prides itself on being a unique institution whose reach extends beyond its campuses in Melbourne and Vietnam, with programs offered through partners in Singapore, Hong Kong, Sri Lanka, Indonesia, India and China, with research and industry partnerships across the globe.

Area of risk

The risk of modern slavery among our student population is not deemed high overall. However, there are risk factors arising from the activities of our student body that may give rise to substandard treatment, including their involvement in WIL programs, unpaid work experience, internship arrangements and volunteering.

We understand that in such situations, students may not be afforded the same protections as those provided under an employer-employee arrangement and that there is a potential for exploitation.

We also recognise that students may undertake work with third parties not connected to their studies (such as part time work) and that this may involve risks of exploitation. These risks may be heightened for international students who may not be aware of their workplace rights and help seeking pathways.

We also acknowledge that we have a role to play in educating students who may take up future careers in sectors that are at high risk for modern slavery (such as sectors that may rely on higher risk goods or services). Engaging with these students during their time at university can help ensure they are aware of how modern slavery might occur in these sectors and position them to drive change.

Actions taken

To manage the risk of substandard treatment of students, we continue to maintain a number of practices:

Work Integrated Learning (WIL) programs

Partner screening – all prospective WIL partners and other relevant third-party organisations are screened via a due diligence form designed in consultation with Legal and the central Health, Safety & Wellbeing (HSW) team to assess their appropriateness and legitimacy. For student experience programs, a third party is used to identify partners and allocate students to these partners.

Industry partner due diligence has been implemented across all Colleges. RMIT requires all new WIL industry partners to complete the WIL due diligence form prior to signing the WIL agreement. A discipline-based, risk assessment process has been developed to identify and assess any industry-specific requirements, which provides an opportunity to look at specific sectors that are at high risk of modern slavery.

Partner agreements – the WIL Partner Agreement defines the partner's responsibility for student welfare, including the provision of a safe and secure working environment.

Actions taken

Volunteering programs and activities

The RMIT Students Group supports best practice management of university volunteering programs in line with the **National Standards for Volunteer Involvement**, Volunteering Australia.

This approach utilises the application of quality assurance instruments, including:

- A Student Volunteering definition, Volunteer Agreement and Volunteer Activity Descriptions endorsed by RMIT Legal.
- A Volunteer Program Management Health Check.
- Standardised 'Volunteer Training' covering volunteer rights, responsibilities, volunteer and child safety, conduct and privacy policy, communication, inclusion and accessibility, wellbeing and support information.

Further activities relating to the Student Volunteer program endorsement, evaluation and volunteer recognition are continuously delivered as BAU and monitored via the Student Volunteer Community of Practise and Steering Group.

RMIT Student Clubs

The RMIT Clubs Program cultivates community, fosters skill development, and facilitates networking and connection building for students and RMIT members through diverse activities. Skill and professional development are offered and aligned with RMIT's active, applied and authentic pedagogical approach.

Although the University has not directly engaged with our student clubs on the issue of modern slavery to date, there are a range of processes in place to ensure they are supported to operate safely, respectfully and in compliance with RMIT policy, including:

- **Incident Reporting:** Clubs and their leaders are encouraged to report any incidents, including near misses, via the RMIT SafetyNow portal for effective management and risk mitigation.
- **Risk Management:** Student Life club events and activities are registered and approved by RMIT staff to ensure compliance with university rules. This includes submitting attendee lists with emergency contact information and appropriate risk assessments.
- **Safer Community:** Club leaders are briefed and encouraged to report any unwanted behaviours to the RMIT Safer Community team.
- The **Student Clubs Code of Conduct** provides guidance and enforceable standards for Club Members, with the aim of maintaining a positive, inclusive, and respectful environment for all participants. This encompasses any behaviour that is deceptive, disruptive, coercive, or violates accepted ethical standards.
- **Student Clubs Apparel Procurement:** Club merchandise sales are now being centralised through the Shopify-based clubs portal alongside the RMIT Store, although sourcing remains fragmented across multiple supply chains. A phased action plan to improve ethical procurement and modern slavery compliance will be progressed in Q3 2026, with cost pressures remaining the primary barrier to change.

RMIT Global Learning

RMIT Global Learning engages third-party providers to support students spending time overseas. Contracts and agreements are in place to ensure that the health, safety and wellbeing of our students is paramount during their global experiences, these include:

- International Student Mobility Agreement
- Third Party Provider Agreement
- Work Integrated Learning Agreement

All students undertake a compulsory 'Preparing for Learning Abroad' training module in which they are supported to create a safety plan in preparation for any unforeseen incidents while overseas. The module includes how to respond in the event of a travel or safety incident, how to maintain good health while abroad and responding to a medical emergency. International SOS are engaged to provide 24/7 support to students if they need urgent assistance overseas.

Any new partnership goes through the Global Partner Approval Process (GPAP), with extensive due diligence undertaken to understand country and partner risks and to ensure partners have strong values alignment with RMIT.

Student Support and Wellbeing

All RMIT students have access to a comprehensive suite of wellbeing and mental health supports. Including confidential means to report incidents that happen on or off campus. We take a trauma-informed person-centred approach to support.

- Safer Community provides confidential reporting and support for students experiencing threatening, exploitative, or coercive behaviour.
- The RMIT Student Legal Service provides support and legal advice and responds to students who might be concerned that they are being exploited or threatened.
- Student Welfare Advisors provide support, advice and referrals to students, including financial aid and accommodation support.
- The counselling service provides therapeutic support through 1-1 appointments.



Our supply chain

5

Context

As one of Australia's largest tertiary institutions, RMIT has a significant impact through the University's operational footprint and supply chain. This allows the University to leverage its buying power to drive improved practices in the supply chain and support the strategic objective of contributing to the communities we serve.

Guided by the RMIT Procurement Policy and Procedure, RMIT integrates sustainability considerations into its procurement practices, including processes, responsibilities and governance. The University's approach to sustainable procurement is aligned with the international standard, ISO 20400:2017 Sustainable Procurement – guidance (ISO 20400). The standard defines sustainable procurement as “procurement that has the most positive environmental, social and economic impacts possible over the entire life cycle”.

RMIT has a sector-specific supply chain to procure the goods and services needed to conduct our activities, which includes our entities outside of Australia.

Throughout this statement, Tier 1 in our supply chain represents the supplier with whom we have a direct relationship – we directly purchase goods and services from them. Tier 2 represents the suppliers of our Tier 1 supplier(s), Tier 3 represents the suppliers of Tier 2, and so on. We maintain formal and long-standing relationships with our contracted suppliers and undertake regular reviews of supplier relationships and contracts on an ongoing basis.

Through our Workday procurement platform, we have been able to present our total Tier 1 supplier spend for 2025, including Vietnam and Europe. This new way of reporting provides a more consistent methodology and transparency across our entities, and more granular data than was provided in our previous statements.

In 2025, RMIT engaged directly with 5,074 distinct Tier 1 suppliers across all entities (suppliers may be engaged by multiple entities).

Figure 1 – Number of Tier 1 Suppliers by RMIT Location

Entity	Number of suppliers				
	2021	2022	2023	2024	2025
RMIT AUS	2,906	3,587	3,724	3,910	4,049
RMIT VTN	599	834	894	898	892
RMIT Spain	67	113	111	122	133

Figure 2 – Total Spend by RMIT Location

Entity	Total Spend AUD				
	2021	2022	2023	2024	2025
RMIT AUS	\$395,650,062	\$391,126,660	\$438,018,330	\$438,062,629	\$465,849,881
RMIT VTN*	\$19,251,002	\$20,419,165	\$48,091,943	\$48,715,619	\$44,934,466
RMIT Spain*	\$502,051	\$1,090,260	\$1,088,502	\$1,527,465	\$1,911,169

*These figures are based on date of invoice issued, and include total supplier spend across CAPEX and OPEX. They may be slightly different to the RMIT Annual Report due to pre-payments and accruals. RMIT Vietnam and RMIT Spain spend data is captured in AUD, with currencies converted from VND and EUR based on the average exchange applicable for the relevant calendar year.

Figure 3 – RMIT Percentage of Total Spend by Region (includes all entities)

Region	Percentage Spend				
	2021	2022	2023	2024	2025
Australia	82.67%	80.29%	78.46%	79.62%	80.32%
Asia	6.52%	12.01%	13.92%	13.91%	13.01%
Europe	3.99%	3.92%	3.38%	3.49%	3.78%
North America	6.53%	3.67%	4.09%	2.91%	2.80%
Oceania (inc NZ)	0.28%	0.07%	0.10%	0.03%	0.06%
Africa	0.01%	0.02%	0.02%	0.03%	0.02%
South America	0.00%	0.02%	0.03%	0.01%	0.01%



In 2025, approximately 80.32% of our overall spend across all entities was paid to suppliers based in Australia. The above spend-by-country map reflects RMIT campus activity and the suppliers registered domicile, covering student recruitment agencies, partner institutions, publishers and scientific equipment suppliers.

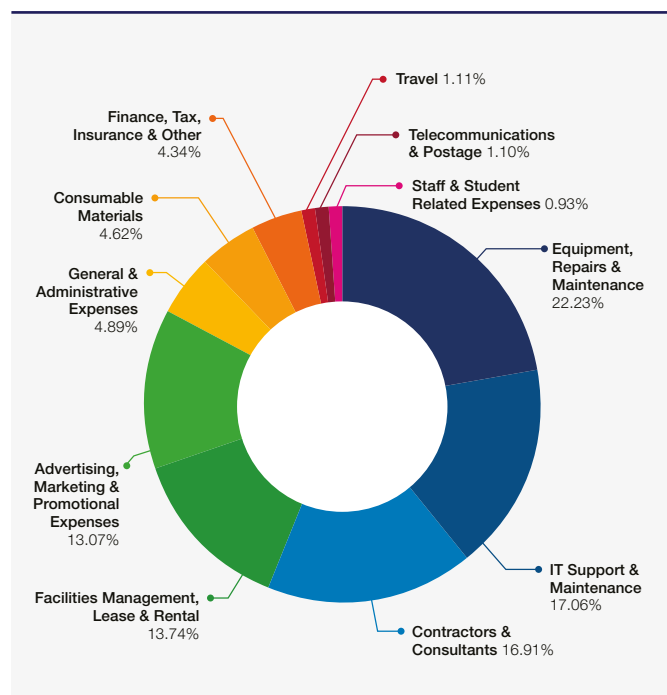
RMIT takes a risk-to-people approach, recognising that supplier spend does not correlate to modern slavery prevalence and that the risk of modern slavery may be present even in our smallest suppliers.

Our supplier expenditure is ordered by spend categories, which are explained below:

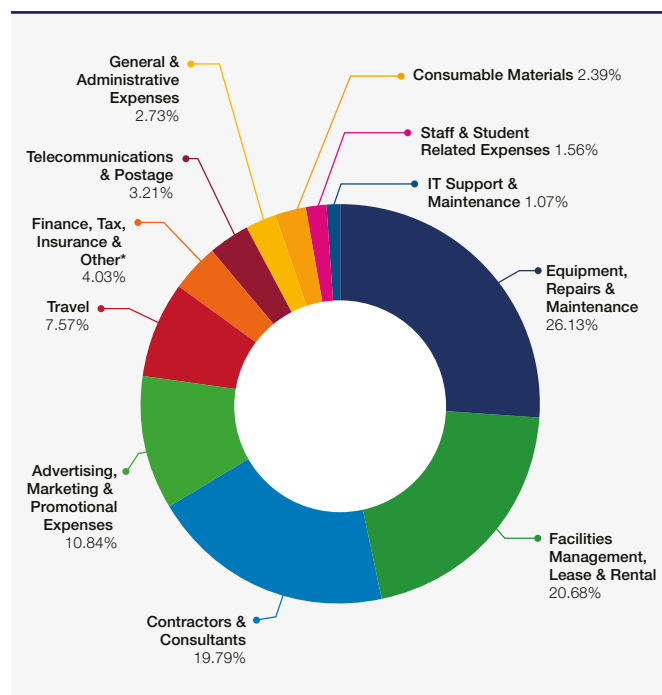
Spend category	Description
Advertising, Marketing & Promotional Expenses	Promotional, media, marketing and event management expenditure.
Consumable Materials	Office consumables, printing, lab supplies and educational materials.
Contractors and Consultants	Includes those providing professional services to RMIT.
Equipment, Repairs & Maintenance	Property and building maintenance, equipment and IT hardware.
Facilities Management, Lease & Rental	Facilities management and leasing, including cleaning, waste removal, utilities, security services and car park management.
Finance, Tax, Insurance & Other	Banking, insurance and investment management.
General & Administrative Expenses	Document management and storage as well as items such as memberships and subscriptions.
IT Support & Maintenance	IT software licensing and managed services
Staff & Student Related Expenses	OHS support, professional development and awards.
Telecommunications & Postage	Freight, logistics, postage, storage and telecommunications.
Travel	University travel requirements, such as flights, hotels and car hire.

Below is the spend data by category for each RMIT entity:

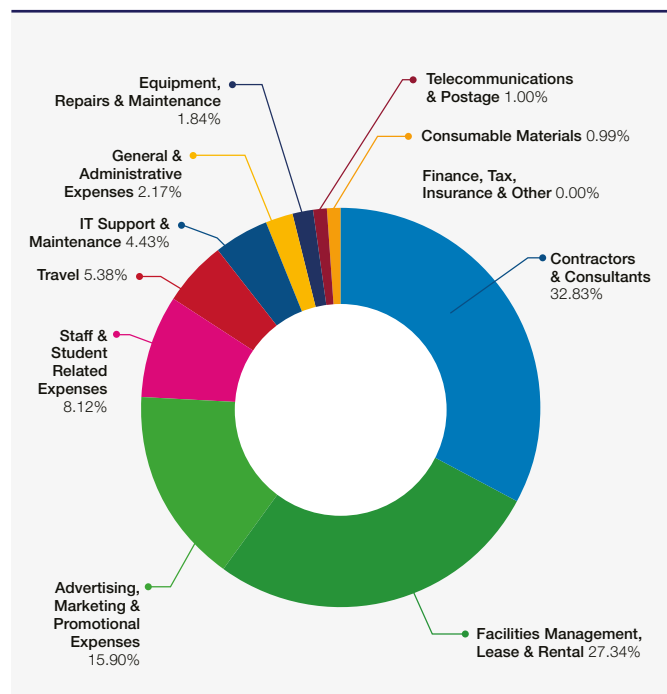
RMIT Australia



RMIT Spain



RMIT Vietnam



*The significant reduction in Finance and Tax data from 45% last year to 4% this year is due to a correction in reporting methodology. In the prior year, spend amounts coded to intercompany payments and taxes were incorrectly included in the Finance and Tax category. This has been rectified in the 2025 reporting year, and these amounts have been removed to ensure the data more accurately reflects true external spend. As a result, the Finance and Tax percentage this year is materially lower and more representative.

Managing our supply chain risks

We acknowledge that while over half of our Tier 1 suppliers are based in Australia, some of these suppliers may have complex supply chains and source inputs from higher-risk geographies. We also recognise that Australia is not immune to modern slavery risks and are committed to also monitoring our onshore suppliers for risks. Due to the limited visibility of our extended supply chain, we recognise the importance of understanding our relationship to potential modern slavery risks, in line with the UNGPs. As such, in identifying our risks, we endeavour to consider whether there is potential that we could cause, contribute to, or be directly linked to modern slavery practices.

Supplier and partner contracts and agreements

Our supplier and partner agreements all include specific clauses on modern slavery, including the University's standard Services Agreement, Licence to Occupy, and Purchase Order Terms and Conditions.

Localised versions of these contracts are in full use by our controlled entities outside of Australia to ensure compliance with relevant legislation in the respective region.

Current supplier and partner agreements include a right-to-audit clause, which RMIT can exercise at its discretion. In 2025, at short-notice payslip audits were undertaken on 10% security personnel, as well as 10% facilities services direct and subcontractor employees selected at random. No non-compliances against the employment contract and award were identified. Changes to awards and sector modern slavery risk issues continue to be monitored and discussed with affected RMIT vendors to ensure the vendors continue to comply with legislative obligations as well as RMIT expectations and their applicable Modern Slavery Statement commitments.

Sample contract clauses

The Contractor will, and will ensure that the Contractor's personnel, contractors and agents (Personnel) and the Contractor's Supply Chain Participants:

- a) comply with Human Rights;
- b) notify the Principal promptly and in any event within 10 days of becoming aware of any actual, alleged or suspected breach of this clause by the Contractor, any of the Contractor's Personnel, or any of the Contractor's Supply Chain Participants; and
- c) cooperate with and assist the Principal in relation to any investigation or legal proceedings in relation to any actual, alleged or suspected breach under this clause.

Human Rights means rights and freedoms that have been universally recognised in international law, domestic law or international declarations or standards which relate to the rights of employees in the workplace including but not limited to those that are set out in The Universal Declaration of Human Rights, The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the rights and obligations enshrined in any Modern Slavery Law.

Supply Chain Participant means, in relation to a business, any organisation or individual involved in the chain of production or provision of particular goods or services to that business.

Due diligence processes and procurement systems

The RMIT Procurement Policy and Procedures applicable to the RMIT Group explicitly prioritise compliance with the *Modern Slavery Act* and commitment to the triple bottom line approach regarding environmental, social and financial sustainability, including labour and human rights principles. All RMIT staff are required to proactively assess the risk profile of any proposed procurement and refer high-risk expenditures to the RMIT Procurement Team. The RMIT Workday Enterprise Resource Planning System incorporates a common supplier registration process for all new suppliers. A supplier registration form captures key information on each supplier during onboarding, including acknowledgement of RMIT's Supplier Code of Conduct, and requests supplier responses on human rights (including modern slavery), labour standards, and environmental practices. The information is made visible in summary format to all staff who use the supplier search function in the Workday system, allowing them to better identify those that have acknowledged the Supplier Code of Conduct and considered their obligations on human rights, labour standards and modern slavery.

In 2025, 15.82% new supplier registrations were rejected due to suppliers not submitting a completed CSR questionnaire.

Sector collaboration

Since 2023, RMIT has been a member of the **Australian Universities Procurement Network (AUPN)**, a group which represents the Australasian and New Zealand higher education sectors and works to improve excellence in procurement practice and the skills of procurement professionals.

The AUPN modern slavery program is a Higher Education sector-wide initiative involving 41 universities across Australia and New Zealand. The program leverages the collective spend and market influence as well as expertise to maximise purchasing power, drive ethical procurement, and ensure compliance with the *Modern Slavery Act 2018* (Cth). AUPN's Modern Slavery Program conducted sector-wide risk assessments to identify and prioritise supply chain categories with the highest potential impact. In 2025, member universities reviewed over 180,000 suppliers, representing a combined spend of \$14 billion, to map and monitor modern slavery risks across procurement activities. This data-driven approach enables targeted interventions and helps ensure compliance with the *Modern Slavery Act 2018* (Cth) and related regulations. Focus areas include medical equipment, ICT, and international student recruitment.

Nine dedicated forums brought together expert speakers, survivor advocates, and procurement professionals to discuss topics such as ethical apparel procurement and risk identification tools. Regular newsletters, university case studies, and monthly updates facilitate continuous learning and improvement. The sector also benefits from the national rollout of ACRATH's Educating for Change micro-credentials, developed in partnership with Flinders University and the University of South Australia. These six online modules, free for staff and students, cover an introduction to modern slavery, university-specific risks, and practical sector guidance. As of the end of 2025, they have been implemented by 32 Universities in Australia, including RMIT. AUPN also has partnerships with global organisations such as Electronics Watch, which provides independent monitoring and remediation support in electronics supply chains. These collaborations ensure universities have access to credible resources, up-to-date training, and specialist support, enhancing their ability to prevent and address modern slavery risks.

AUPN's future priorities include expanding risk assessments, deepening supplier engagement, the development of guidance covering student protections, and exploring stronger analytics capabilities through third party systems.

High-risk spend categories

The following information outlines the associated example actions undertaken in 2025 to address specific categories of suppliers which have been identified as having a higher risk of modern slavery:

Property Services Vendors – Business as Usual Operations

Inherent modern slavery risks

Property Services vendors are essential to the operation of our campuses. Within the 'Equipment, Repairs & Maintenance' and 'Facilities Management' spend categories, a variety of Property Services vendors are engaged on an ongoing basis to support on-campus operations. These vendors include cleaning services, building maintenance, waste management, vertical transport (lifts and elevators), removals and mailroom services.

Industries of this nature may pose a key modern slavery risk relevant to service procurement, where personnel may be subject to the withholding of wages, immigration-related coercion and threats, debt bondage, confiscation of personal and travel documents, and dangerous and substandard working conditions.

Examples of actions taken

As of 2025, RMIT Australia's *direct* service maintenance vendors have express contractual obligations, particularly anti-slavery provisions, RMIT right to audit and no subcontracting without RMIT pre-approval, and all are subject to reporting under the *Commonwealth Modern Slavery Act 2018*.

RMIT Vietnam has similar contractual labour obligations on its Property Services vendors. Multiple Master Service Agreements with vendors were set up and maintained in 2025 for preventative maintenance services to all Mechanical Electrical Plumbing Firefighting system as well as the supply of spare parts and consumables for the Heating, Ventilation and Air-conditioning (HVAC) systems, sewage treatment plant, and electrical systems, to further improve compliance and monitoring.

Property Services Vendors – Construction (labour and materials)

Inherent modern slavery risks

Construction work performed in upgrading and constructing new buildings may present risks of modern slavery. The construction industry can be vulnerable to sub-standard working conditions, poor safety practices and worker exploitation. The risks may be driven by the construction industry's competitive bidding process and post-pandemic labour shortages.

In addition, construction companies may source materials from countries considered at a higher risk of modern slavery.

Examples of actions taken

Property Services has a range of panels in place to provide access to pre-qualified suppliers for building services, construction, hazardous material removal and furniture supplies.

Centralised management of Property Services vendors and supplier panels includes the RMIT Australia Builders and Minor Works Panel, in which members prequalified for refurbishment and construction projects under \$10M are subject to demonstrated continual compliance with panel agreements, including the upholding of labour standards and modern slavery risk minimisation. The Panel's scope and membership have been expanded to minimise the risk of non-panel appointments, which in turn reduces the risk of unscrutinised supply chain and employment arrangements.

The vendor that managed the 2025 solar panel installation project in RMIT Australia was obliged to report on its progress in managing high risk labour and supply chains via its Modern Slavery Statement. It had a direct relationship with a primary manufacturer and has panel traceability reports from this supplier, which provided assurance that solar panels are being manufactured outside the Xinjiang Uyghur Autonomous Region. As an additional risk management process, the vendor undertook regular manual screening of the Uyghur Forced Labor Prevention Act (UFLPA) Entity List and media reports to remain abreast of any specific linkages between its primary solar supplier and allegations of forced labour risks.

Electronics and IT hardware (computers, audio-visual, etc.)

Inherent modern slavery risks

The use of electronics is essential for students and staff during our everyday operations, including the use of computers, projectors, audio-visual equipment, and associated networking and peripheral devices on our campuses. Electronics and hardware have a high modern slavery risk, most prevalent in the raw material extraction that occurs to supply the electronics industry, including the mining of conflict minerals, where workers may be subject to dangerous and life-threatening working conditions.

The risk of modern slavery is also present during the manufacture of electronic goods in high-risk geographies, where forced labour or other modern slavery practices may be present. Additional risks may arise further down the supply chain through the assembly of components, logistics, and recycling or disposal of electronic equipment, where labour standards may be less visible or harder to monitor.

Actions and Developments

The procurement process for electronics and IT hardware follows our organisation-wide due diligence procedures and screening for suppliers that may have indicators of higher modern slavery risk. The Agreements for the supply of IT and audio-visual hardware give RMIT the right to audit to ensure ethical employment and legislative rights are fully complied with, including labour standards and modern slavery obligations.

RMIT's computer hardware provider was acquired by CHG-Meridian, which is subject to the UK & European Union Modern Slavery laws, including annual public reporting on its work in mitigating against modern slavery and human rights violations. In 2025, RMIT continued engagement with this provider to improve supply chain transparency, including greater visibility of upstream manufacturing and sourcing practices, and strengthen assurance over compliance with labour standards and modern slavery obligations.

RMIT also continued to prioritise the use of preferred suppliers with established modern slavery governance frameworks and public reporting, and to embed modern slavery considerations into sourcing decisions for new and renewing electronics and hardware arrangements.

RMIT Vietnam has similar contractual labour obligations on its ITS vendors and plans to set up the vendor panel for the Computing Accessories and AV system provision in 2026.

IT development and hosting services

Inherent modern slavery risks

As a technology-driven university, we continue to rely on hosted IT services, including learning and administrative platforms. As such services are often hosted and supported overseas, the risk of exploitation and mistreatment for offshore technology providers is present in these sectors, including IT development, hosting and support. Risks may include excessive working hours, underpayment, lack of freedom to change employers, and limited worker protections in certain offshore jurisdictions.

Examples of actions taken

Acting on the modern slavery risk indicators present in IT development and hosting services, we prioritise using RMIT terms and conditions incorporating CSR and modern slavery standards in new and renewing IT suppliers. Where the vendor's terms and conditions are utilised instead, we require RMIT standards to be incorporated. Audit clauses are now incorporated in all new contracts. RMIT's core hosting arrangements are via the Australian Government (since 2022). Most IT development resources used by RMIT are now either internal teams or in Australia, and are subject to Australian laws. Where offshore resources are utilised, the vendor is required to get RMIT pre-approval, keep records demonstrating compliance with Australia's modern slavery laws and notify RMIT within 10 days in the event of any actual, suspected or alleged breach. In 2025, RMIT continued to reinforce these requirements through contract renewals and supplier engagement, with a focus on clearer documentation of offshore labour arrangements and ongoing monitoring of higher-risk service providers.

Laboratory supplies, office supplies and furniture

Inherent modern slavery risks

In many areas of campus operations, we utilise products such as laboratory and classroom supplies (e.g. rubber gloves, chemicals, paper, and stationery) as well as equipment for ongoing use (e.g. tables, chairs, desks, and other furniture). The manufacturing of the associated input materials has a high risk of modern slavery as they may include forced labour, child labour and more broadly, instances of sub-standard and exploitative labour conditions, where informal and unregulated suppliers are common.

These risks may come from activities such as the harvesting of natural rubber for glove production, and the cultivation of plants and timber used in furniture and paper processing.

Examples of actions taken

The RMIT Lab Consumables Panel Agreements, set up in 2024, explicitly require that suppliers ensure their own suppliers also comply with the RMIT Supplier Code of Conduct, relevant human rights and modern slavery obligations. RMIT has the full right to access and audit operations and records to verify compliance. The Panel's scope and suppliers have widened in comparison to the last Panel to minimise off-panel lab consumables purchases and therefore suppliers at risk of contravening Australian modern slavery laws.

Any off-panel lab consumables purchases are subject to CSR due diligence per the supplier registration process.

The RMIT Furniture Panel ensures that only furniture which complies with the RMIT Furniture Standards is supplied to the University. The Standard requires furniture to meet a range of sustainability rating/certification schemes, which take into account CSR, labour standards and modern slavery risk management. Where builders and architects propose alternative furniture not available from the RMIT Furniture Panel, the alternative furniture supply arrangements are also subject to the RMIT Furniture Standards. RMIT Vietnam is going to market in 2026 to refresh its expired furniture Master Service Agreement.

RMIT Australia and RMIT Vietnam, respectively, have a single, whole-of-university supplier for office supplies and stationery to ensure products are ethically and sustainably sourced. The Agreement explicitly requires that, as a Tier 1 supplier, their suppliers also comply with the RMIT Supplier Code of Conduct, relevant human rights and modern slavery obligations. RMIT has the full right to access and audit operations and records to verify compliance.

The existing centrally managed agreements for printing services incorporate similar human rights and modern slavery risk management obligations.

Clothing and merchandise

Inherent modern slavery risks

The RMIT Store, owned and operated by the University, is responsible for providing a range of official branded clothing, accessories and course equipment which are sold online and on campus. While this represents a relatively small category of spend, these items remain highly visible and are produced by third-party clothing and textile manufacturers locally and offshore.

Some products sold through the RMIT Store may carry modern slavery risks due to the involvement of third-party sourcing of materials and manufacturing, as well as the risk of practices such as unauthorised subcontracting, falsified audit reporting, and a lack of response to corrective action plans.

Examples of actions taken

The RMIT Store continues to utilise its own supplier screening practices in addition to those required when a vendor is onboarded through Procurement. This includes the collection of information and documentation such as supplier audit reports, corrective action plans and current certifications.

These practices are tailored to the size, scale and types of goods sold in the Store, and reflect the values of the University, particularly in relation to textile manufacturing. They have been developed to mitigate risks associated with forced and child labour in the production of goods and operate alongside the broader due diligence requirements embedded within standard procurement processes.

In 2025, the Store introduced an online supplier screening process to support a more consistent approach to documentation collection. While this has provided a structured pathway for supplier submissions, suppliers have continued to engage through existing channels, with documentation often provided directly. The Store continues to refine this approach to balance accessibility with improved record-keeping and oversight.

More broadly, the RMIT Store contributes to student awareness of ethical consumption through curriculum-based projects delivered in collaboration with the School of Design & Social Context (DSC) academics, alongside engagement activities such as Sustainability Week.

Directly procured food and beverages (RMIT kitchens, tea points and meeting rooms)

Inherent modern slavery risks

RMIT has kitchens, tea points and meeting rooms that provide beverage supplies such as tea, coffee and sugar. Food procurement may present a risk of forced labour and instances of sub-standard and exploitative labour conditions in supply chains and during processing.

Examples of actions taken

RMIT preferences Fairtrade certified products, which maintain third-party certification providing for fair and equitable protection of food producers. This is in addition to our standard procurement due diligence processes. We continue to work with our stationery suppliers (who supply this category) to ensure we encourage local buyers across RMIT to select these products.

On-campus retailers

Inherent modern slavery risks

Retail and hospitality industry workers can be vulnerable to sub-standard working conditions and underpayment of wages, due to industry-specific factors driven by the casual and seasonal nature of this work. Certain goods, which may be sold by retailers, such as seafood, dried fruit and nuts, coffee, palm oil, cocoa, coconut and rice, are also at high risk of forced labour, human trafficking and debt bondage.

RMIT leases space to external vendors who operate on-site to sell food and beverages. These vendors are treated as RMIT tenants and therefore operate outside of our centralised procurement practices. However, the contractual agreements with these entities refer to adherence to RMIT policies and procedures, which include RMIT's Modern Slavery Statement. Reminders are sent to these vendors annually of the University's expectations and standards.

Examples of actions taken

Contractual arrangements are in place with on-campus retailers via our Licence to Occupy agreement. The templates now refer to a general obligation for licensees to comply with all applicable laws. There is a specific schedule attached to our licenses which calls out compliance with the RMIT Supplier Code of Conduct, Sustainability Policy and sustainability commitments, including Fair Trade.

Actions taken across other procurement categories

RMIT's capital equipment purchase and maintenance agreements now all enforce audit rights, modern slavery and human rights management obligations on vendors, such as the plane engine rebuild arrangements entered into in 2025 and the extension of aircraft maintenance arrangements. This ensures consistent contractual obligations across capital equipment suppliers regardless of whether they have an ongoing relationship with RMIT.



Philanthropic & Other Investments

About

RMIT Philanthropy connects our community of supporters – donors, staff, alumni, industry partners and students – with University initiatives they are passionate about, to deliver strategic funding and support that advances RMIT's ambitions.

In 2025, a total of AUD\$4.3 million was distributed to 1,114 students through scholarships, prizes and travel grants. Removing barriers to education and supporting student success remained a priority. Most of the \$82,000 raised through our two major appeals was directed to equity scholarships, which are crucial to levelling the playing field for students from disadvantaged backgrounds, and hardship grants for students experiencing unanticipated financial stress.

Research projects also benefited from philanthropic support, including the **Safety and Health Innovation Network (SHiNe)**, driving innovation and improvements in safety, health and wellbeing in Australia's construction industry. Members of this giving circle collectively contributed \$468,000. A further \$2.1 million was raised to support research, including \$861,000 in Higher Education Research Data Collection (HERDC) funding.

The **RMIT Responsible Investment Principles** guide the University's investment managers to ensure the portfolio minimises activities that have a material impact on climate change, including involvement in fossil fuels, while screening for issues relating to public health and wellbeing.

As at 31 December 2025, RMIT held \$196.4 million across two funds managed by Russell Investments, with \$90.9 million held in the Philanthropic Fund and \$ 105.5 million in the Long-Term Investment Fund. Both funds follow an identical strategic asset allocation, comprising equities, bonds, and cash. Importantly, 100 per cent of the equity component across both funds is invested in two responsible investment products.

- **Russell Investments Sustainable Global Shares ex Fossil Fuels Fund:** a fund that invests in a broad range of global shares, designed with Russell Investments' robust decarbonisation strategy and excludes companies with fossil fuel reserves, as well as companies with significant involvement in fossil fuels. In addition to the decarbonisation strategy, other controversial industries are excluded, and the portfolio is positively tilted towards companies with higher-than-average material ESG scores reflecting best practice in sustainable investing.
- **Russell Investments Australian Responsible Investment (RARI) ETF:** a fund that invests in Australian shares and trusts listed on the ASX that also excludes companies with fossil fuel reserves. The fund is weighted towards companies that demonstrate positive ESG characteristics after negatively screening for companies that have significant involvement in a range of controversial activities. RARI has been certified by Responsible Investment Association Australasia (RIAA) to the strict operational and disclosure practices required under the Responsible Investment Certification Program.

Inherent modern slavery risks

There is a level of risk of modern slavery within the underlying asset holdings of any investment product. The combined modern slavery risk profile across the underlying assets is complex, with many of these assets being exchange-listed companies with global operations and international, multi-tiered supply chains. Some of these companies are required to produce a modern slavery statement under the Act, with this level of reporting providing greater transparency of asset-level modern slavery risk programs to investors.

Actions Taken

The University invests through a 'pooled funds' structure, where investments are not directly held by RMIT. Pooled funds are those where there are several different types of investors whose money is 'pooled' and invested together.

The use of pooled funds means that direct investment decisions, such as whether to buy shares in an individual company, are not made by the University. Instead, RMIT works with an asset consultant to set parameters on the Environmental, Social and Governance (ESG) impacts of its investments. The asset consultant then assists the University in finding suitable investment products that best match the University's ESG parameters.

RMIT Responsible Investment Principles (the Principles) guide our investment managers to minimise negative social and environmental risks, including human rights and modern slavery violations and to create positive sustainability outcomes. We monitor the portfolio in relation to globally accepted norms on corporate sustainability behaviours to ensure we meet our commitments to the UN Global Compact.

In 2025, the RMIT Investment Committee updated the Principles and developed additional screening guidelines to further strengthen the ESG investment approach.

RMIT also requires our investment managers to be a signatory to the UN Principles for Responsible Investment (PRI). PRI is the world's leading proponent of responsible investment. The PRI works with its international network of signatories to put the six Principles for Responsible Investment into practice. Its goals are to understand the investment implications of ESG issues and to support signatories in integrating these issues into investment and ownership decisions.

RMIT's external investment managers, Russell Investment Management Ltd, are subject to the requirements of the *Modern Slavery Act 2018* (Cth). The company publishes an annual Modern Slavery Statement on its [website](#).

Russell Investments is required to formally report annually to the RMIT Investment Advisory Group on the actions it has undertaken to address modern slavery.



Grievance mechanisms and remediation

6



RMIT's Whistleblower Procedure is the primary mechanism for anyone wishing to report concerns they may have about illegal, unethical or improper conduct involving RMIT or its staff, Council members, students or researchers, while protecting the person making the report, including disclosures in relation to modern slavery. We continue to operate an externally managed whistleblower hotline, via our third-party vendor Stopline.

Modern slavery has been a category in the overall RMIT Group Complaints report since 2023. Any allegations or complaints of modern slavery would be highlighted in the report to the ARMC on a biannual basis.

The compliance management system explicitly covers the *Modern Slavery Act* and processes include bi-annual compliance control assessments, in-depth review, reporting to Executive Management and ARMC, and monitoring through check-ins, allowing for greater assurance, as well as visibility and awareness across leadership. The program also assists RMIT in monitoring legislative changes pertaining to the Act.

In 2025, RMIT did not receive any whistleblowing allegations or complaints that alleged breaches of the *Modern Slavery Act*. We acknowledge this does not necessarily indicate that no modern slavery occurred during this period, and we remain committed to ensuring our whistleblowing mechanisms are trusted and accessible to our stakeholder groups.

The public-facing complaints portal has a clear mechanism where anyone can anonymously lodge a complaint regarding allegations of modern slavery breaches, and is easily accessed via search engines.

Safer Community is our dedicated service for students and staff to report unwanted or threatening behaviour, including whether they are experiencing, or know someone who is experiencing, substandard treatment.

As part of RMIT's commitment to addressing identified modern slavery issues within its operations and supply chains, a response and remediation protocol is being developed as a key component of the RMIT Modern Slavery Roadmap. At present, any such instances would be responded to in accordance with our existing policies and procedures.



Impact

7

Since its founding, RMIT has been an active and influential member of civil society, working to build trust and create shared benefits in the communities where we operate. To meet future challenges and shape the world, RMIT expects all graduates to demonstrate a wide range of practical skills and expertise, whatever their program of study, including being ethical global citizens. RMIT's collaborative approach to research means we work together with our partners to develop and apply knowledge to shape a better world. It is with this lens of learning, teaching, research and partnership that RMIT can have the greatest impact in helping to address global challenges such as human rights and modern slavery. The section below highlights a few key examples of the work undertaken in 2025.

For more information on RMIT's sustainability impact, read our latest **Sustainability Annual Report**.

RMIT Business and Human Rights Centre

The **RMIT Business and Human Rights Centre (BHRIGHT)** is Australia's first and only research centre focused on Business and Human Rights and the only centre of its kind in the Asia Pacific region. Through multi-disciplinary research, engagement with a wide range of stakeholders, and education, they provide thought leadership to advance Business and Human Rights related policy and practice nationally and internationally.

Located in the College of Business and Law, the centre's mission is to contribute research, education and practical support to ensure that businesses respect the human rights of workers, customers, and communities where they operate, as well as throughout their national, regional and global value chains. The Business and Human Rights research agenda benefits from multidisciplinary approaches, drawing upon and contributing to legal and management approaches to the field.

The Centre runs trainings and consultancies to generate and share innovation and train current and future leaders to develop and integrate human rights standards in their respective industry contexts. BHRIGHT currently teaches over 300 undergraduate Law and Business students a course on Business and Human Rights, the only compulsory course specifically on this subject in any law professional degree in Australia.

BHRIGHT amplifies the voices of affected communities and workers through a range of conceptual frameworks and methods to develop solutions for a future that is fairer, more equitable and sustainable.



The UN Business and Human Rights Regional Forum: Australia and New Zealand

In August 2025, BHRIGHT hosted the inaugural United Nations Business and Human Rights Regional Forum: Australia and New Zealand - Strengthening responsible business practices in turbulent times.

The **UN Business and Human Rights Regional Forum** The **UN Business and Human Rights Regional Forum** took place at RMIT's City campus, marking the first of its kind in the region. More than 500 attendees and over 100 speakers from industry, government, civil society, affected communities and academia came together and discussed and debated human rights impacts and business responsibilities.

The UN Forum was co-organised with the UN Global Compact Network Australia, UN Working Group for Business and Human Rights, UNSW Australian Human Rights Institute, Macquarie University's B&HR Access to Justice Lab and World Vision New Zealand. The UN Forum would not have been possible without the efforts of RMIT staff and teams that intersected with the event, and the RMIT student volunteers and UN Global Compact Network Australia interns who volunteered their time.

The UN Forum held multiple sessions and side events on a host of topics related to current human rights challenges in relation to businesses and different perspectives on ways forward. This included modern slavery and supply chains, just transitions and the role of businesses on Indigenous Peoples' rights, AI and the human rights responsibilities of tech companies in developing and deploying AI, corporate human rights responsibilities within the financial sector, and due diligence.

A highlight was the session on '*Human rights, business and turbulent times: Challenges, responsibilities and opportunities*'. The event featured a special video message from Sam Mostyn AC, Governor-General of Australia, and a distinguished panel comprising:

- Helen Clark, Former Prime Minister of New Zealand, UN Development Programme Administrator, Member of The Elders.
- Peggy O'Neal AO, Chancellor, RMIT University.
- Sharan Burrow AC, Advisory Council, University of Melbourne Climate Futures; Visiting Professor in Practice, London School of Economics.
- Linda Kromjong, President, amfori.
- Robert McCorquodale, Member, UN Working Group on Business and Human Rights.

A recording of the session is available on **ABC Big Ideas**.

Other examples of impact from BHRIGHT in 2025:

- **Heightened Human Rights Due Diligence for Businesses in Conflict Zones**

Associate Professor Jonathan Kolieb, Director of BHRIGHT contributed his expertise on responsible business practice and human rights in conflict zones in the UN Digital Training Program **'Responsible Business in Conflict: A training on heightened human rights due diligence'**, which was developed by the UN Development Programme and the UN Working Group on Business and Human Rights. The training program provides education to businesses with operations in conflict zones, in understanding and responding to human rights impacts through business activities, as well as NGOs and civil society organisations working in conflict zones as well in advocacy, monitoring and due diligence.

- **Building Responsible Business Capacity in Vietnam**

BHRIGHT Director Associate Professor Jonathan Kolieb co-delivered a two-day workshop in Vietnam on *'Responsible Business Conduct: Its Importance to Vietnam Business and Government'*, convened by the Vietnam Chamber of Commerce and Industry in partnership with the Australian Human Rights Commission. The program targeted local business and legal academics, strengthening their capacity to incorporate responsible business conduct and human rights standards into teaching, research and engagement with government and industry. This initiative was built on a five-day Business and Human Rights Workshop (28 August – 3 September 2025) co-led by BHRIGHT and **UNSW's Australian Human Rights Institute** for a Vietnamese delegation representing members of the Vietnam Chamber of Commerce and Industry and academics in business and law.

The workshop was facilitated by Associate Professor Jonathan Kolieb, Dr Thuy Nguyen, BHRIGHT Theme Leader of Labour and Supply Chains, Professor Justine Nolan, Director, Australian Human Rights Institute. Sponsored by the Department of Foreign Affairs and Trade and hosted by the Australian Human Rights Commission, the workshop provided in-depth education on business and human rights frameworks and corporate responsibility in the Vietnamese context, equipping participants to apply these principles on their return to Vietnam.

- **Roundtable Discussion on Modern Slavery in Fashion**

BHRIGHT was very pleased to co-host a roundtable discussion *'Modern Slavery in Fashion: The Human Rights Impact on Women'* on 13 November in Melbourne, led by Dr Melissa Wheeler, BHRIGHT's Gender Theme Leader and Jon Hewitt from RMIT's School of Fashion and Textiles. The event was co-hosted with RMIT's School of Fashion & Textiles' **Weft Research Centre** and in collaboration with RMIT's **Social Enterprise Research Network**.

The evening brought together key people within RMIT and across the industry to discuss the important topic of supply chains, modern slavery and labour rights, corporate social responsibility of businesses and the disproportionate impacts on women in the supply chain industry globally.

The evening featured two speakers who shared different expertise from within the industry and within research. Rachel Reilly from Ethical Clothing Australia shared her insights from working alongside women facing modern slavery, as well as Dr Harriette Richards from the Weft Centre, who shared her research on labour, gender, and modern slavery within the fashion sector.

Reforming the Corporations Act to include Human Rights Due Diligence

In *'Desegregating Business and Human Rights: Including Due Diligence in the Corporations Act'*, co-authors Prof Shelley Marshall (RMIT), Dr Esmira Hackenberg (RMIT Vietnam), Dr Tim Connor and Claire Dudgeon (University of Newcastle) argue that the time is now ripe for legislative reform that embeds human rights due diligence into the Corporations Act.

The Corporations Act 2001 (Cth) does not currently contribute to legislative efforts to hold companies accountable for human rights harms or to provide remedies for affected individuals. While the United Nations Guiding Principles on Business and Human Rights anticipate a central role for corporate law, international obligations have been implemented outside corporation's law. Some jurisdictions – such as France, Germany, and the European Union – have introduced mandatory human rights due diligence regimes. France embeds these in its corporate code; Germany's regime operates alongside it. However, these reforms remain politically contested, with both the German Act and the EU Corporate Sustainability Due Diligence Directive facing delays.

The article considers whether, and in what form, a due diligence obligation could be introduced into Australian corporations law. Drawing on international developments, it proposes a model requiring risk analysis, compliance systems, grievance mechanisms, and remedy access, and considers ASIC's potential role in supervision and enforcement.

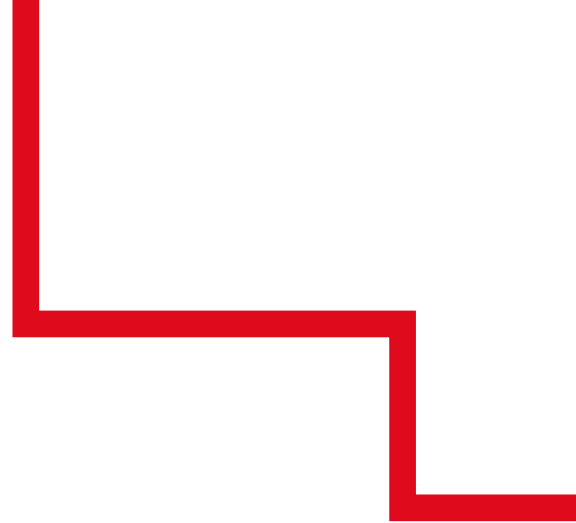
To read the full proposal, see Vol 41(2) of the **Company & Securities Law Journal**.





Appendix 1

– Controlled entities



Appendix 1 – Controlled Entities Entity	Identifier	Description
RMIT Holdings Pty Ltd (Australia)	ABN 74 096 911 312	RMIT Holdings Pty Ltd (Australia) is the holding company for RMIT University Vietnam LLC (a private Vietnamese company), operating the business of RMIT University Vietnam. RMIT was invited by the Vietnam Government to establish Vietnam's first foreign-owned university in 1998 and RMIT Vietnam was established in Ho Chi Minh City in 2000.
RMIT University Vietnam LLC	MSDN 0302169193	A wholly owned entity of RMIT Holding Pty Ltd. Its purpose is to conduct education and training activities for both undergraduate and postgraduate levels in Vietnam. It also supports research activities with an aim to help solve critical global problems and to deliver significant economic, social and environmental impact.
RMIT Training Pty Ltd, trading as RMIT University Pathways (RMIT UP)	ABN 61 006 067 349	RMIT University Pathways (RMIT UP) is a wholly owned entity of RMIT. As an international education provider, it offers a range of solutions to students, academics and professionals in Australia and overseas. Best known for providing specialised pathways for international students seeking entry into RMIT University, RMIT UP also houses a number of other operations and services, including Informit, a leading digital destination connecting people across the globe with credible, current information from trusted international thought leaders and academics.
RMIT Online Pty Ltd	ABN 38 614 454 170	RMIT Online Pty Ltd is a wholly owned entity of RMIT. Its purpose is to advance education through online modern technology and pedagogy and to provide best-in-class digital learning experiences. It provides undergraduate, postgraduate and short courses of study to support people through a lifelong learning journey.
RMIT Spain S.L.	CIF B65886012	A wholly owned entity of RMIT. Its purpose is to promote RMIT's global teaching, industry and research activities in Europe and serves as a gateway for the University to European research, industry, government and enterprise. Operating as RMIT Europe, the University's European hub was established in 2013 and is based in Barcelona, where it connects RMIT to Europe for research and innovation outcomes including collaborative research and development with industry, European research project consortia membership, HDR opportunities as well as student experiences.

Index

Final index to be incorporated in the final design to page references for the RMIT response in the statement.

The *Modern Slavery Act* sets out seven mandatory criteria for the content of statements:

Reporting criteria	Section of statement that addresses reporting criteria	Page
Identify the reporting entity.	About this statement	3
Description of reporting entity's structure, operations and supply chains.	About RMIT	6
	Our people	18
	Our supply chain	24
Description of the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Our people	18
	Our supply chain	24
Description of the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Our compliance landscape	10
	Our people	18
	Our supply chain	24
	Grievance reporting and remediation	40
Description of how the reporting entity assesses the effectiveness of such actions.	Throughout	—
Description of the process of consultation with any entities the reporting entity owns or controls.	About this statement	3
Other relevant information.	Impact	42

