

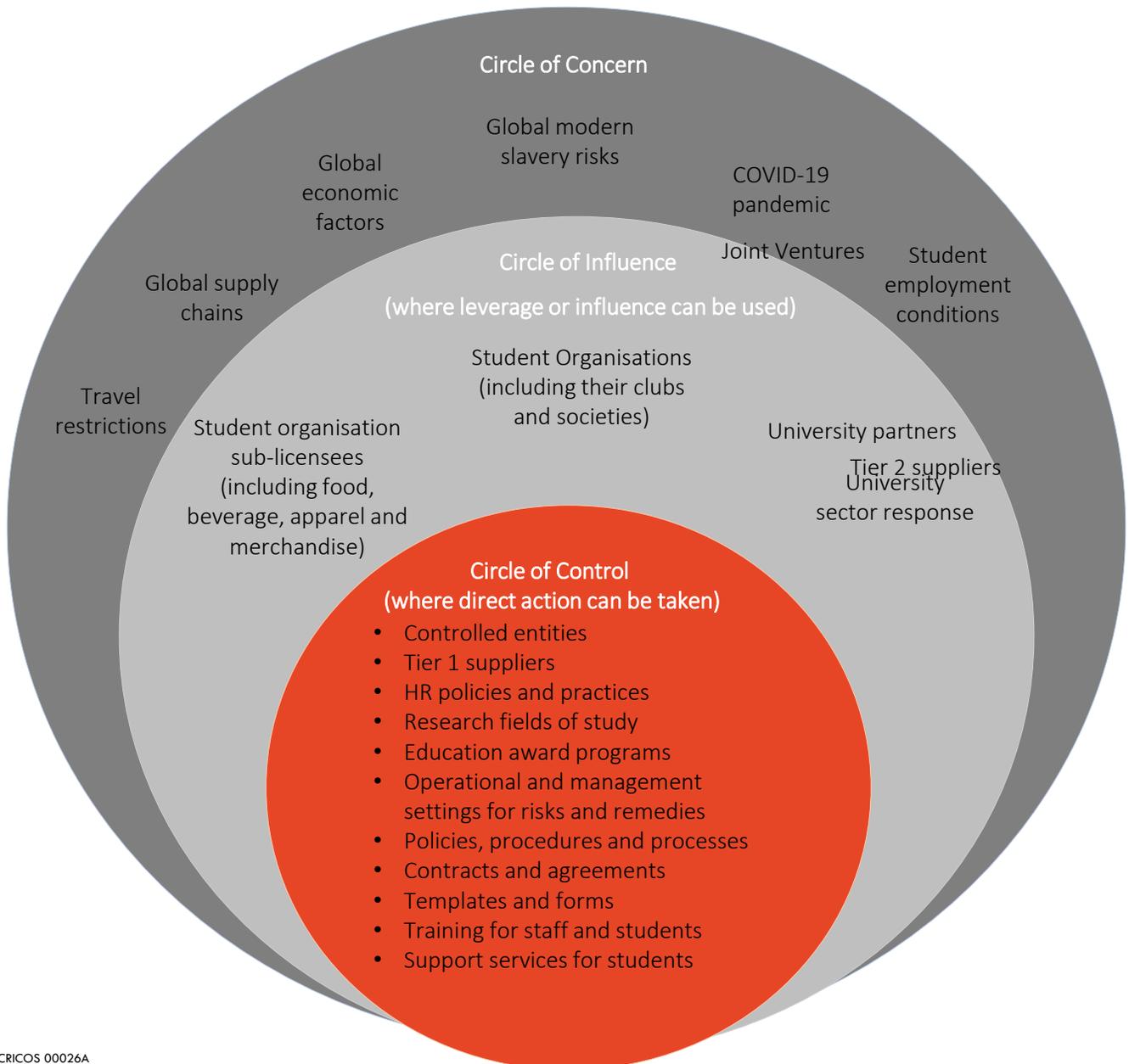


Modern Slavery Due Diligence Framework

Note on applying the model in practice:

The below framework provides a guide for taking meaningful action to address modern slavery risks when and where we can within the legal, policy, operational and management settings we control and effect change.

The framework enables us to firstly map the University’s value chain, and secondly identify where in that value chain we have direct control, leverage and influence. This is overlaid with the modern slavery risks identified through our risk analysis process, which then determines which of those risks we can be directly address through our actions.



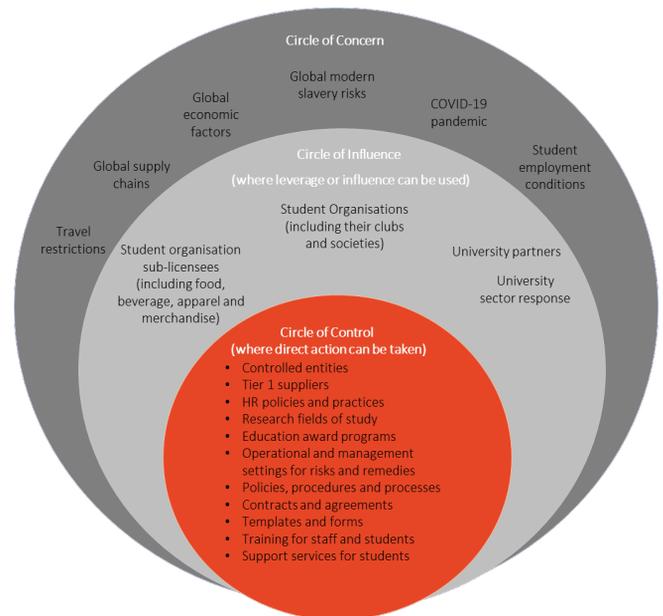


Applying the Due Diligence Framework

Throughout 2021, we applied our Modern Slavery Risk Framework to prioritise our efforts and take meaningful action. In practice, this meant identifying our ‘circle of control’ such as our existing policy and legal levers, management controls, governance settings, due diligence processes and any other process or procedure we could amend to incorporate a respect for human rights. Focusing on our ‘circle of control’ enabled us to understand the influence and leverage we have to effect change, especially as these internal actions have a positive flow-on effect on our suppliers, partners and affiliated entities, and the broader university community.

How we take action is informed by set principles:

- **Actions are risk-based** and differ in their application to reflect the operating environment and the level and type of risk posed to people
- **Actions are fit for purpose** and prioritised based on risk and meeting organisational needs.
- **Actions are balanced** and commensurate with our capacity to implement and monitor them
- **Actions can be embedded** into our existing legal, policy, and operational settings.



Case study: Applying our Modern Slavery Framework in practice

When it comes to addressing modern slavery risks in practice, the global and complex nature of modern slavery risks can make it difficult to know where to start. Many of the well understood modern slavery risks are global risks or risks well beyond the reach or direct control of any one entity. However, each organisation has levers, management controls, policy, and governance settings it directly controls, which can contribute towards addressing a global risk in a direct way.

One example is the risk of exploitation and modern slavery experienced by our students in their external workplaces or in their personal lives. The framework shows us that the University cannot control external working conditions of students, or their personal circumstances which may put them at risk of experiencing modern slavery-like conditions. However, we can control whether our students can become informed of the potential risks and be equipped with the appropriate information or support services available to them. In response, we offer an anti-slavery training module for students on spotting the signs of exploitation and referral pathways available. Since its launch in late 2020, the module has been voluntarily completed by over 8,200 students.