

Modern Slavery Statement **2022**

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The Modern Slavery Act

The *Modern Slavery Act 2018* (Cth) (the Act) has established Australia's national modern slavery reporting requirement.

'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.



Introduction

RMIT University recognises modern slavery risk as a complex global human rights issue, and we continue to further our actions in pursuing the elimination of modern slavery across our operations and supply chains.

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

- RMIT's structure, operations and supply chains
- Our consultation processes with 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
- Our consultation processes with RMIT's controlled entities

The reporting entity for this statement, RMIT, trading as RMIT University, comprises the following wholly owned and controlled entities: RMIT Holdings Pty Ltd, RMIT University Vietnam LLC, RMIT Spain S.L., RMIT Training Pty Ltd, and RMIT Online Pty Ltd. These entities are primarily based in Australia, Spain, and Vietnam, and consist of all RMIT's owned and controlled entities under the Act. These entities were involved in the drafting of this statement.

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 external specialists, the Global Slavery Index 2018, government advice, and ongoing news and developments on modern slavery risks and issues both globally and in Australia.

Our key areas of risk relating to modern slavery remain:

- Staff
- Students
- Supply chains
- Philanthropic investments

RMIT's modern slavery awareness and maturity remains foundational. In 2022, the RMIT Modern Slavery Working Group worked with external consultants to scope out the steps required to embed modern slavery risks management into core business processes. A peer review was undertaken, along with a gap analysis by the consultants. Several workshops were held with key stakeholders across all entities, to more deeply explore the University's exposure to modern slavery risks and to develop priority action areas.

This process has resulted in greater awareness of modern slavery and capability-building across these areas. An implementation roadmap is to be developed in 2023.

Compliant with the requirements, the RMIT Modern Slavery Statement for the 2022 calendar year is endorsed by the RMIT Council and signed by the Vice-Chancellor and President.

Our approach to addressing Modern Slavery



Vice Chancellor's statement

At RMIT we are committed to identify and address modern slavery risk across our own operations and contribute to global efforts where its presence may be obscured in supply chains. We are a values-led University, focused on making a positive contribution within the local and global communities where we operate, so this is fundamental.

We take modern slavery risk seriously and acknowledge our responsibility to play our part towards its long-term eradication. As a global tertiary education institution, we also have a unique opportunity to make a difference through our research and innovation capabilities. As a result, it is incumbent on us to use our expertise and influence to educate and inform on human rights issues across business more broadly.

RMIT is at the foundation of our modern slavery journey, but we are making progress. Since our last statement we have given particular focus to strengthening the governance of our controlled entities. The major overhaul of our risk framework is another important step, making accountability clear and capturing risks from all areas of the University. Given modern slavery is a multifaceted issue that crosses multiple areas, visibility is critical.

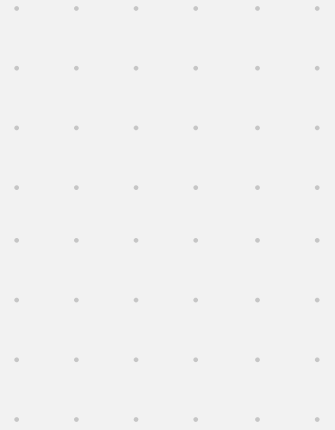
We are committed to using our scale and influence in support of the call for organisations to align their strategies and operations with universal principles on human rights, labour, environment and anti-corruption. So we are proud to be a longstanding signatory to the UN Global Compact and members of the UN Global Compact Network Australia and Supply Chain Sustainability School, reflecting our strong track record on sustainability that is supported by practical partnerships with industry and community.

Looking ahead, we will remain vigilant in our commitment and informed on emerging developments in modern slavery risk and human rights issues. At RMIT we see education as a path to choice and opportunity in a world where this kind of abuse has no place.

Professor Alec Cameron
Vice-Chancellor and President

About RMIT





RMIT is an international university of technology, design and enterprise with more than 90,000 students and close to 10,000 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 (Ho Chi Minh City, Hanoi and Danang) and a research and industry collaboration centre in Barcelona, Spain. In addition, programs are offered through partners in Singapore, Hong Kong, Sri Lanka and mainland China, with research and industry partnerships across the globe.

Core to our reputation is educating highly employable graduates and global citizens, ready to contribute in complex times. So along with industry relevance, creativity and inclusivity are hallmarks of an RMIT education. Our diverse global community of over 480,000+ graduates, live and work in more than 150 countries around the world and return throughout their careers to refresh and update their skills or change career direction altogether.

As a collective and as individuals, we commit to respectful ways of working and understanding that acknowledge the experiences, 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.

We are driven to serve the communities who rely on us, and no time in our history has been more filled with challenge and change than right now. Our values are central to our ability to respond to this challenge and guide our modern slavery response.



Controlled Entities

RMIT, trading as RMIT University (ABN 49 781 030 034), is the reporting entity for this statement. This entity comprises the following wholly owned and controlled entities, which have been included in this statement:

Entity	Identifier	Description
RMIT Holdings Pty Ltd (Australia)	ABN 74 096 911 312	The holding company for RMIT University, Vietnam LLC (a private Vietnamese company) operating the business of RMIT University Vietnam.
RMIT University Vietnam LLC	MSDN 0302169193	A wholly owned entity of RMIT Holding Pty Ltd. The University's Asian Hub operates across three locations in Hanoi, Ho Chi Minh City and Da Nang
RMIT Training Pty Ltd	ABN 61 006 067 349	A wholly owned entity of RMIT that provides a range of education solutions delivered from Melbourne to students, academics and professionals located in Australia and overseas
RMIT Online Pty Ltd	ABN 38 614 454 170	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	RMIT Spain S.L is a wholly owned entity of RMIT. Its purpose is to promote RMIT's global teaching and research activities in Europe and serves as a gateway for the University to European research, industry, government and enterprise.

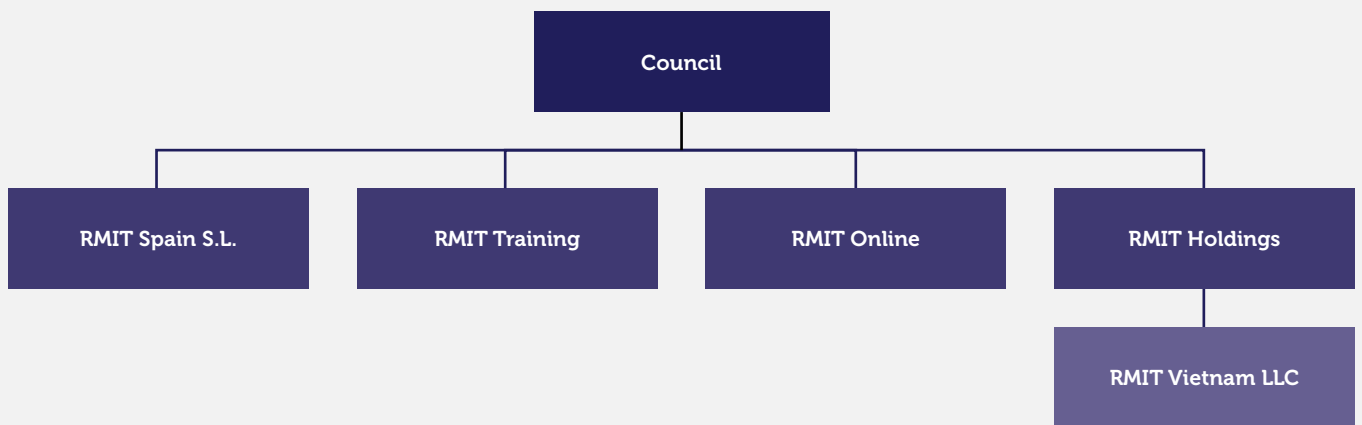
Note: RMIT University Indonesia Pty Ltd was a wholly owned subsidiary of RMIT University, but it was deregistered and did not undertake contracting activities relevant to modern slavery risks.

These entities were consulted in both the development of this statement and annual action planning to ensure the modern slavery risks related to their operations and supply chains are fully understood.

RMIT's controlled entities are each governed by a Board of Directors and are focused on supporting important strategic initiatives in pathways, online, and international operations.

In 2022, there was a review and strengthening of the Controlled Entity Policy to ensure that 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 as outlined in the policy section.

In 2022, a new Pro Vice-Chancellor, Vietnam was appointed as the most senior leadership position in-country accountable for the overall performance of RMIT in Vietnam. The role will provide local leadership across academic disciplines and professional services, along with financial accountability. An Executive Director, Operations, was also appointed to report to the PVC and be accountable for RMIT's professional services functions and operational activities in Vietnam. These appointments improve Vietnam's alignment with enterprise processes and strengthen governance and oversight of the controlled entity.



Governance

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

RMIT Council

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

The Chancellor presides as Chairperson at every meeting of Council and is responsible for providing leadership to the Council in achieving its role as set out in the RMIT Act. The Chancellor ensures that appropriate mechanisms are in place for monitoring and evaluating the Council's effectiveness and enables all members to contribute as independent individuals.

The Chancellor provides advice and support to the Vice-Chancellor and facilitates constructive communication between Council and the senior management of the University.

Council members participate in the approval of the University's strategic direction, annual budget and annual operating plan, and in monitoring the University's performance. The Council appoints the Vice-Chancellor and President. Consistent with the RMIT Act, the RMIT Council is the University's highest governing body and has responsibility for the general direction and superintendence of the institution.

In 2022, 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
- One person elected by and from staff

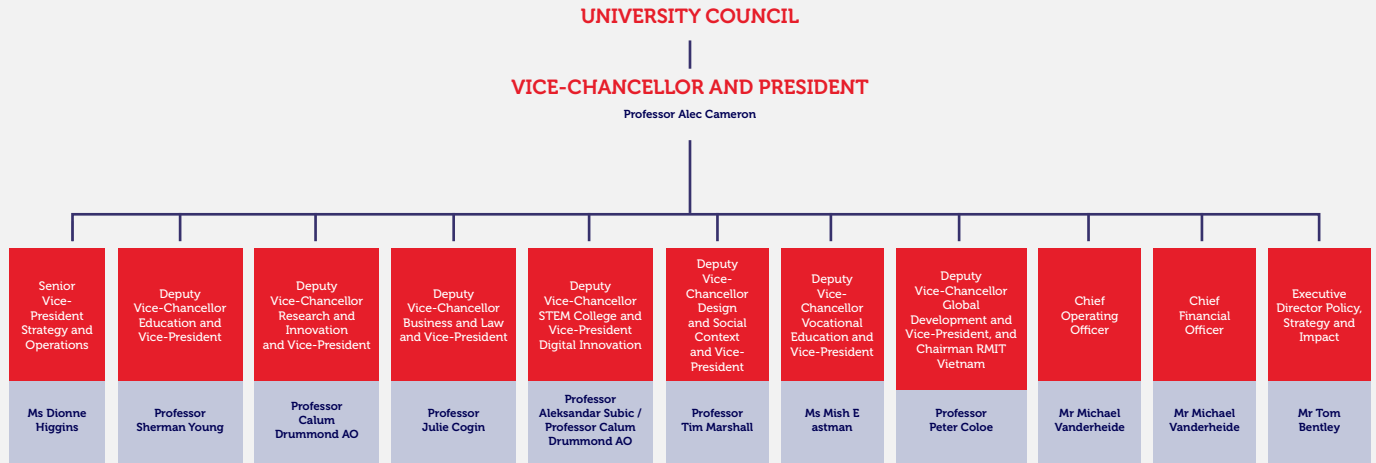
One of the primary responsibilities of the Council is to oversee and monitor the assessment and management of risk across our organisation, including commercial activities. The Council continues to provide accountability and oversight for our modern slavery risk management approach, bearing responsibility for the review and endorsement of this statement.

The Audit and Risk Management Committee (ARMC) acts on behalf of the Council to monitor the audit controls and risk management of the University and associated processes.

The ARMC maintains responsibility for oversight of modern slavery risk management practices, assisting Council to fulfil its responsibilities in relation to the University's external and internal audit functions, risk management framework, and compliance framework. Quarterly reporting on Modern Slavery will be provided to ARMC as part of the overall RMIT Group Complaints report in 2023.

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.



RMIT 2022 Organisational Structure

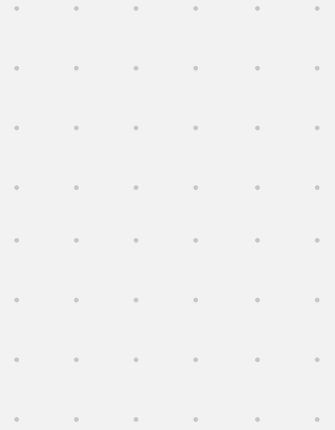
For more information on the RMIT Governance Structure, see the [2022 Annual Report](#).



Our Compliance Landscape



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Policies

Our policy approach is guided by a University-wide Policy Governance Framework (the Framework), describing, developing, approving, reviewing and maintaining policy documents at RMIT. The Framework applies to all policy documents developed for and on behalf of the University and its controlled entities.

The Framework is intended to fulfil the following objectives:

- a) provide high quality, consistent and transparent policy documents for staff, students and affiliates of the RMIT Group
- b) govern the control environment for effective compliance with legislation and other mandated requirements
- c) enable the functioning of the University and its controlled entities to achieve enhanced efficiency in their operations
- d) provide a structure for systematic development, communication, implementation and review of policy documents
- e) provide a structure for incorporating reconciliation and Aboriginal and Torres Strait Islander self-determination as a core RMIT value.

RMIT has committed to addressing modern slavery, labour and human rights risk in all relevant policies. As new policies are written or updated this lens is applied. For example, in 2022 RMIT's Procurement and Expenditure Policy underwent a major review. The policy now expressly states:

- RMIT's expenditure on third-party goods or services is subject to Australian Commonwealth laws, including the Act 2018.
- RMIT is committed to the triple-bottom-line approach regarding environmental, social and financial sustainability. All procurement decisions will take account of RMIT's responsibilities and obligations regarding labour and human rights principles, including the risk of modern slavery in supply chains.

The Policy Governance Framework is scheduled for review in 2023 which presents an opportunity to strengthen the University's commitment to the UN Global Compact principles, including human rights and modern slavery.

The table below outlines policies that either clearly articulate our stance and approach towards modern slavery risk or are pending the input of modern slavery lens at a future review. Policies have a full review every five years, and the progress on these reviews will be tracked in each Modern Slavery Statement (links have been provided to publicly disclosed policies).

Policy	Context	Review Year
<u>Sustainability Policy</u>	Expresses RMIT's commitment to advancing its sustainability ambitions as an organisation that models institution-wide excellence. 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 implement tools to assess the effectiveness of these actions.	Approved 2020
Corporate Social Responsibility Framework (Authority for this document is established by the Sustainability Policy)	Provides a screening methodology to identify individuals, businesses and / or organisations that have the potential to create an ethical or reputation risk to the University. The Framework provides the information we need to implement appropriate risk mitigation and ensure Corporate Social Responsibility (CSR) obligations are met as a signatory to the UN Global Compact. This includes specific consideration of human rights issues (including modern slavery), labour practices, corruption, and environmental concerns.	Approved 2020
<u>Supplier Code of Conduct</u> (Authority for this document is established by the Sustainability Policy)	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.	Approved 2020
Controlled and Non-Controlled Entity Policy	Establishes the governance framework for the University's controlled and non-controlled entities to ensure that the University operates in accordance with its obligations under the RMIT Act and that RMIT University Council has appropriate oversight of all functions and activities conducted by Entities.	Effective 1 January 2022
<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. Makes explicit reference to the Modern Slavery Act 2018 (Cth). This policy strengthens oversight of the RMIT Controlled Entities to ensure greater compliance, risk management and governance.	Approved 2022
<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.	Approved 2022

Policy	Context	Review Year
Policies/Procedures Scheduled for Review		
<u>Code of Conduct</u>	Provides guidance and defines the enforceable standards for our ways of working, ways of knowing and ways of being. Outlines how we work together as a community of professionals, academics, education practitioners and researchers, setting the standard for ethical behaviour, and guiding our culture and attitude towards the elimination of modern slavery.	To be reviewed in 2023
Third-Party (Educational Delivery)	This is a new policy under development which focuses on the delivery of award courses via third parties/partners. There is an opportunity to strengthen third-party due diligence through the lens of this policy	New – 2023
<u>Risk Management Policy</u>	Sets out the key principles and expectations to support the effective management of risks to our activities, objectives and strategy, and promotes transparency and integrity in our decision making.	To be reviewed in 2023
<u>Compliance Policy</u>	Defines our framework and objectives for the management of compliance obligations and promotes a positive compliance culture as an integral part of ensuring good governance and operational excellence.	To be reviewed in 2023
<u>Complaints Governance Policy</u>	Sets out the principles and governance framework that inform our approach to complaint handling. The grievance and remediation requirements of the Modern Slavery Act will be considered during the review of this policy and associated procedures.	To be reviewed in 2023
<u>Third-Party Complaints Procedure</u> (Authority for this document is established by the Complaints Governance Policy)	This procedure applies to any third party wishing to raise a complaint or concern about 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.	To be reviewed in 2023
<u>Whistleblower Procedure</u> (Authority for this document is established by the Anti-Corruption and Fraud Prevention Policy)	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.	To be reviewed in 2023
<u>Travel Policy</u>	The purpose of this policy is to ensure the safety and wellbeing of all RMIT travellers and travel activities while maintaining the financial integrity and compliance of all travel activities. In the next review RMIT has committed to improving our practices to combat modern slavery within the scope of this policy	To be reviewed in 2023

Risk Management

RMIT's Risk, Audit and Compliance Function was restructured in the second quarter of 2022, creating a Central Risk Management Function that reports directly to the Chief Financial Officer. These structural changes, combined with an internal audit of the risk management framework and oversight processes, provide a strong opportunity to implement and support the changes required to ensure risk management at RMIT continues to mature and plays a crucial role in the achievement of RMIT's strategic objectives and compliance obligations.

As a result, a new RMIT Risk Management Model, endorsed by the Audit Risk Management Committee, has been developed and implementation has commenced through a transformation roadmap. A key concept of the new Risk Management Model was the introduction of Risk Domains, Tier 1 and Tier 2 Risks and the retirement of the previous Key University Risk (KUR) structure.

What is a Risk Domain?

- Risk Domains are a key enabling mechanism of the revised risk management model.
- Risk Domains are risk categories that help manage risks impacting RMIT's objectives. Risk Domains are used to scope or frame risk causes that should be validated and controlled in an ever-changing risk environment.
- Risk Domains will replace Key University Risks, which were not reflective of the enterprise-wide risk profile and did not enable a risk trade-off/ risk-reward analysis, aligned with risk appetite and funding prioritisation for treatment plans.

What is a Tier 1 Risk?

- Tier 1 risks are sub-categories of risk domains for which causes and thresholds are identified. Tier 1 Risks are enterprise-wide (where applicable) and owned at the Director level.

What is a Tier 2 Risk?

- Tier 2 risks are specific risk events at the College/Portfolio level. Tier 2 risks will be owned by the accountable personnel within the specific College/Portfolio

Note: risk tiers do not relate to supply chain tiers

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.

A key component of the Risk Transformation Program for 2023 includes identifying specific instances of modern slavery risk (Tier 2 risks) across colleges/ portfolios, mapping these to the relevant Tier 1 risk and risk domain, and ensuring effective controls are in place to manage these Tier 2 risks.

In 2023, the Risk Team will lead a project to streamline third-party due diligence. The team will design, implement and embed a consistent process to assess the risks arising from all third-party activities across the organisation, allowing for effective prioritisation of treatment plans and actions to mitigate these risks. This will include a 'customer-centric' approach which provides a streamlined and efficient approach to assess the risk of new third parties.

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. This project presents a major opportunity to strengthen due diligence of Corporate Social Responsibility issues, including modern slavery.

Internal Audit

Internal Audit provides independent, objective assurance and consulting services designed to add value and improve the organisation's operations. Internal Audit's mission is to enhance and protect organisational value by providing risk-based and objective assurance, advice and insight. The Internal Audit Team reports functionally to RMIT Council via the ARMC, and administratively to the Chief Financial Officer and Vice-Chancellor.

In 2022, a key internal audit focused on the "Academic Quality Management and Oversight Processes: Controlled Entities and Academic Delivery Partners". From this audit, there was an action to strengthen the due diligence process and checklist for a proposed global education partner as part of the Global Partner Approval Process (GPAP), which has already been implemented by the Global team.

The 2023 Internal Audit Plan includes the following audits/reviews, which will consider modern slavery risks as part of the audit scope (i.e. review of relevant policies and processes):

- Environmental, Social and Governance (ESG) Framework: Offshore Entity and Academic Partner Governance – This review will understand and assess how RMIT maintains a governance framework over offshore entities and teaching partners which ensures the University has oversight of their key ESG practices and initiatives. This will include (but not be limited to) modern slavery risk management.
- Vendor Contract Management – Following the audit of sourcing activities in 2021, this audit will focus on vendor and contract management activities, and include an assessment of the design of processes, key management controls and governance arrangements, which support the end-to-end vendor management lifecycle.
- The implementation of management actions is monitored, validated and reported by Internal Audit to the Audit & Risk Management Committee periodically.

Modern Slavery Working Group

The Modern Slavery Working Group continued in 2022, having been formally adopted as a working group of the RMIT Sustainability Committee. The Sustainability Committee has the responsibility and 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 Goals.

The Modern Slavery Working Group is required to:

- 1) Provide guidance and input into RMIT's annual Modern Slavery statements.
- 2) Monitor and report on compliance obligations under the Act to the RMIT governance bodies, as required.
- 3) Bring together key stakeholders from across RMIT, including the Controlled Entities, to drive continuous improvement in the University's response to addressing modern slavery.

The Working Group supports the ongoing development of a framework of governance, systems and processes to ensure compliance obligations are met under the Act and focus on continuous improvements.

In 2022, a staged maturity model was developed with support from external consultants to enable all RMIT Controlled Entities to make progress in their modern slavery journey, with particular focus on:

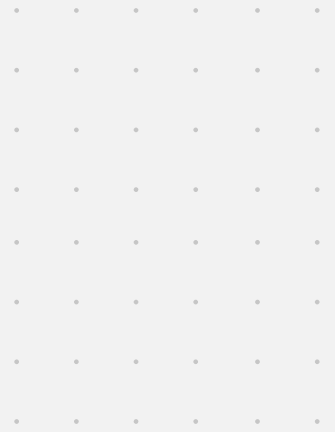
- risk assessment of potential areas of vulnerability to a university context
- supply chain transparency
- policy and governance
- staff development
- identification and remediation of modern slavery.

Following this process an implementation roadmap will be developed in the second half of 2023, to align with enterprise planning for 2024.

Our People



3



Staff

RMIT employs just over 10,000 staff globally, comprising a workforce of professional and academic staff based at one of our three campuses in Melbourne – Melbourne City, Brunswick and Bundoora.

Australian onshore staff are based at one of our three campuses in Melbourne – Melbourne City, Brunswick and Bundoora. All are covered by Enterprise (Collective) Bargaining Agreements, with 4,387 of our staff employed on a casual basis.

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 of approximately 1,000 staff 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.

At RMIT Europe (Spain), our 34 employees in Spain are engaged as either permanent/ongoing, temporary/fixed term, or under an internship agreement. All employment contracts are issued in accordance with the Spanish National Collective Agreement for Private Universities and in compliance with Spanish labour laws.

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. 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

- All 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 legislative changes in Spain, from January 2022 RMIT Spain will no longer issue temporary employment contracts.

Students

As of 31 December 2022, RMIT had over 90,000 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 taught in mainland China, Singapore, Hong Kong and Sri Lanka; a European innovation hub in Spain; and research and industry partnerships on every continent.



Area of risk

The risk of modern slavery among our student population is not deemed high. 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.

Actions taken

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

WIL programs

- **Partner screening** – all prospective WIL partners and other relevant third-party organisations are screened via a desktop scan to assess their appropriateness and legitimacy. For student experience programs, a third party is used to identify partners and allocate students to these partners.
- In 2022, there was a major focus on Health, Safety and Wellbeing (HSW) with the implementation of a new framework for HSW due diligence for WIL. A discipline-based, risk assessment process is now under development 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.

During 2023 these high-level processes will be filtered through to Colleges and Schools for implementation.

Global Experience Programs

The Global Experience Program uses third-party agents to arrange and oversee placements. 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:

- Education Agent Services Agreement
- Global Experience Service Provider Agreement
- Student Mobility 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 (see internal audit section for more details).

Volunteering programs and activities

Following a review of existing practices in 2021, we identified ten recommendations to mitigate risk, enhance quality assurance and improve student experience related to volunteering activities. The majority of these recommended actions were co-designed by students and delivered in 2022, including the establishment of the 'Student Volunteering Steering Group' and a 'Student Volunteering Quality Assurance Framework'. The Quality Assurance Framework is made up of an internal governance structure and quality assurance instruments including:

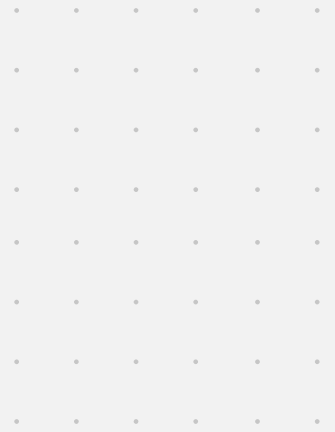
- A Student Volunteering definition, Volunteer Agreement and Volunteer Activity Descriptions endorsed by RMIT Legal.
- A Volunteer Program Management Health Check.
- Standardised 'Volunteer Training' covering volunteer rights, responsibilities, volunteer and child safety, conduct and privacy policy,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

These and further activities relating to the Student Volunteer program endorsement, evaluation and volunteer recognition will continue to be rolled out in 2023.

Our Supply Chain



4



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 Sustainable Procurement Plan, 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 2022, 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 2022, RMIT engaged directly with 4,496 distinct Tier 1 suppliers across all entities (suppliers may be engaged by multiple entities).

Number of Tier 1 Suppliers by RMIT Location

Entity	Number of suppliers	
	2021	2022
RMIT AUS	2,906	3,587
RMIT VTN	599	834
RMIT Spain	67	113

Total Spend by RMIT Location

Entity	Total Spend AUD	
	2021	2022
RMIT AUS	\$416,174,301	\$397,629,610
RMIT VTN*	\$29,701,629	\$660,537,120
RMIT Spain*	\$512,577	\$1,259,092

*These figures include total supplier spend across CAPEX and OPEX and may be slightly different to the RMIT Annual Report due to pre-payments and accruals. RMIT Vietnam and RMIT Spain spend data is captured from Jan-Dec 2022 having previously been reported for June-Dec in 2021, with currencies converted from VND and EUR.

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

Region	Percentage Spend	
	2021	2022
Australia	82.74%	64.30%
Asia	6.66%	23.31%
Europe	4.38%	6.85%
North America	6.16%	4.43%
Oceania (inc NZ)	0.015%	0.91%
Africa	0.012%	0.13%
South America	0.002%	0.06%

Approximately 64.3% of our overall spend, across all entities, was paid to suppliers based in Australia. This was a considerable shift from the previous year, which can be attributed to the full spend profile for Vietnam being migrated to our Workday system in 2022, with much of the increased spending related to financial services.

Supplier expenditure from other locations has been grouped by region, as is practical. Suppliers based in countries with a higher risk of modern slavery may be present in the regional groupings shown. We take 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	This includes our promotional, media, marketing and event management expenditure.
Consumable Materials	This includes our office consumables, printing, lab supplies and educational materials.
Contractors and Consultants	This includes those providing professional services to RMIT.
Equipment, Repairs & Maintenance	This includes all property and building maintenance, equipment and IT hardware.
Facilities Management, Lease & Rental	This includes all facilities management and leasing, including cleaning, waste removal, utilities, security services and car park management.
Finance, Tax, Insurance & Other	This includes all banking, insurance and investment management.
General & Administrative Expenses	This includes document management and storage as well as items such as memberships and subscriptions.
IT Support & Maintenance	This includes IT software licensing and managed services
Staff & Student Related Expenses	This includes OHS support, professional development and awards.
Telecommunications & Postage	This includes freight, logistics, postage, storage and telecommunications.
Travel	This includes all University travel requirements, such as flights, hotels and car hire.



Below is the spend data by category for each RMIT Global Entity:

RMIT Australia

Spend Categories	% of spend
Contractors & Consultants	25.28%
Equipment, Repairs & Maintenance	17.11%
IT Support & Maintenance	14.85%
Facilities Management, Lease & Rental	14.58%
Advertising, Marketing & Promotional Expenses	9.13%
Finance, Tax, Insurance & Other	8.24%
General & Administrative Expenses	4.65%
Consumable Materials	3.57%
Telecommunications & Postage	1.30%
Staff & Student Related Expenses	0.65%
Travel	0.64%

RMIT Vietnam

Spend Categories	% of spend
Finance, Tax, Insurance & Other	42.47%
Equipment, Repairs & Maintenance	16.11%
Facilities Management, Lease & Rental	13.72%
Contractors & Consultants	8.98%
Advertising, Marketing & Promotional Expenses	7.18%
Travel	3.21%
IT Support & Maintenance	2.77%
Staff & Student Related Expenses	1.99%
Telecommunications & Postage	1.32%
Consumable Materials	1.32%
General & Administrative Expenses	0.93%

RMIT Spain

Spend Categories	% of spend
Contractors & Consultants	42.64%
Advertising, Marketing & Promotional Expenses	17.71%
Facilities Management, Lease & Rental	17.47%
Finance, Tax, Insurance & Other	8.57%
Staff & Student Related Expenses	3.64%
IT Support & Maintenance	2.93%
Equipment, Repairs & Maintenance	2.69%
Travel	1.56%
Telecommunications & Postage	1.34%
General & Administrative Expenses	0.74%
Consumable Materials	0.71%

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. Due to the limited visibility of our extended supply chain, we recognise the risk that we are causing, contributing, or directly linked to modern slavery practices.

At this time, we have not yet performed an analysis of modern slavery risks beyond our Tier 1 suppliers. However, we aim to expand our visibility of Tier 2 and beyond as we improve the maturity of our practices.

Corporate Social Responsibility framework

RMIT is a signatory to the Ten Principles of the UN Global Compact - this means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights (including modern slavery), labour, environment and anti-corruption.

The RMIT Corporate Social Responsibility (CSR) framework provides a screening methodology and a range of tools to identify individuals, businesses or organisations that have the potential to create an ethical or reputation risk to the University so that we can implement appropriate risk mitigation and ensure Corporate Social Responsibility (CSR) obligations are met as a signatory to the Compact.

The CSR framework is applied in the procurement process to meet these principles and to ensure that suppliers meet the minimum requirements regarding their own ethical practices. The CSR framework includes a comprehensive screening process for all prospective suppliers and the signing of the RMIT Supplier Code of Conduct as a requirement of the contract process.

All Australian tenders have a weighting for sustainability, Indigenous and student engagement outcomes and sustainability outcomes are also driven through the contract management process with existing vendors.



Supplier and partner contracts and agreements

Our supplier and partner agreements were updated during 2020 to 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 now in full use by our controlled entities outside of Australia to ensure compliance with relevant legislation in the respective region.

These agreements do not require updating each year, and our legal and compliance teams were consulted during the development of the 2021 statement and have confirmed the currency and appropriateness of the relevant clauses.

Current supplier and partner agreements include a right-to-audit clause. In 2022, critical Property Services vendors were audited on employment contracts and payslips, and no regulatory or contractual breaches were identified. We continue to engage with our high-risk vendors throughout the year to ensure they remain compliant.

Due diligence processes and procurement systems

In 2022, RMIT refreshed its Procurement Policy and Procedures. Applicable to the RMIT Group, it explicitly prioritises 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.

In June 2021, we implemented the Workday Enterprise Resource Planning System, incorporating a common supplier registration process for all new suppliers. The newly implemented 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. This information is then made visible in summary format to all RMIT 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.

During 2022, we continued to operate our supplier due diligence program, applying the screening methodology defined within our CSR Due Diligence Guideline to all new and renewing Tier 1 suppliers across all entities. Informed by the CSR Framework, and underpinned by the RMIT Risk Management Process, the Guideline outlines the approach taken to assess and mitigate potential risks associated with the proposed supplier or partner, including modern slavery risk. To complete this screening process, prospective suppliers are required to complete the University's Supplier / Partnership Questionnaire, which includes specific questions on modern slavery risks.

In June 2022, we further refined our supplier registration process breaking the process into two stages:

- 1) Initial supplier details and assessment of risk based on sector and country of operation
- 2) Additional CSR screening questionnaire and evaluation

From June to December 2022, RMIT registered 949 suppliers through the Workday system; of these 35% were subjected to the additional CSR screening process. Following this process, 1.5% of prospective suppliers provided an insufficient response following evaluation and follow-up, and were not registered as suppliers.

High-risk spend categories

A component of the Sustainable Procurement Plan is an annual risk assessment of RMIT's spend categories, with a particularly focus on modern slavery. The assessment is done by the Procurement and Sustainability teams to ensure currency.

The following information outlines the associated actions RMIT is taking 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

Services delivered by our 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 our on-campus operations. These vendors include cleaning services, security, 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.

Actions Taken

In addition to the contractual clauses on modern slavery and supply chain due diligence practices as previously outlined, we continue to apply actions and controls to reduce the identified level of modern slavery risk. These include:

- Centralised engagement and management of the Property Services vendors and supplier panels. This ensures a consistent approach in raising vendor awareness of and discussing concerns associated with modern slavery risk. It also ensures that vendors and supplier panels obtain and discuss changing contractual and legislative obligations related to modern slavery risks as they arise.
- Monthly labour law compliance checks are performed by our vendor management team for our high-risk vendors, supported by quarterly and half-yearly ethical audits for all vendors.
- Tier 2 supply chain compliance obligation on the vendor in the Facilities Management Services agreement, and RMIT audit rights on that tier.

Property Services Vendors – Construction

Inherent modern slavery risks

The 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 are primarily 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

Actions Taken

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

Centralised management of Property Services vendors and supplier panels includes the Builders Panel, in which members are prequalified for construction projects under \$5M subject to demonstrated continual compliance with panel agreements including the upholding of labour standards and modern slavery risk minimisation.

Non-panel construction services are subject to tender and include a comprehensive CSR screening process and the signing of the RMIT Supplier Code of Conduct as a requirement of the contract process. All tenders also have a weighting for sustainability, Indigenous and student engagement outcomes and sustainability outcomes.

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 may be present.

Actions Taken

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. The two supply arrangements were extended on a short-term basis in 2022 while RMIT conducted a market test, and new agreements which will include comprehensive Modern Slavery coverage and supply chain reporting are expected to be agreed in the second half of 2023.

IT development and hosting services

Inherent modern slavery risks

As a technology-driven university, we continue to rely on our 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.

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. In 2022, RMIT moved its core hosting arrangements to the Victorian Government's agreement, replacing a legacy agreement which pre-dated current Modern Slavery standards.

Most IT development resources used by RMIT are now either internal teams or in Australia subject to compliance with 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.

Laboratory supplies, office supplies and furniture

Inherent modern slavery risks

In many areas of our 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 rubber glove production, and the cultivation of plants and timber used in furniture and paper processing.

Actions Taken

All RMIT Lab Consumables Panel Agreements explicitly require that the suppliers ensure their suppliers also comply with the RMIT Supplier Code of Conduct, relevant human rights and modern slavery obligations. RMIT has full right to access and audit operations and records to verify compliance. 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 all relevant Australian standards including, but not limited to, sustainable product certification schemes such as GECA FFM v.3.0-2017 and GreenRate Level A. Assessments under many of these certification schemes take into account corporate social responsibility, 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 has a single, whole-of-university supplier for office supplies and stationery in order to ensure products are sustainably sourced. The Agreement explicitly requires that this Tier 1 supplier ensures its suppliers also comply with the RMIT Supplier Code of Conduct, relevant human rights and modern slavery obligations. RMIT has 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 is owned and operated by the University and is responsible for providing a range of official branded clothing, accessories and course equipment which is sold online and on campus. Despite a small category of spend, the items sold remain highly visible and are produced by third-party clothing and textile manufacturers locally and off-shore.

The RMIT Store carries a considerable amount of modern slavery risk due to the involvement of third-party sourcing of materials and manufacturing. At any stage of the manufacturing process, the RMIT Store can lose oversight if suppliers use unapproved sub-contractors. This increases the risk of forced or slave labour.

Actions Taken

Since 2019, the RMIT Store has continued to implement and refine its supplier screening practices and onboarding requirements that demand information beyond Tier 1 suppliers, including supplier audit reports and corrective action plans.

The ethical sourcing practices of the RMIT Store are unique and have been developed to mitigate against the risk of forced and slave labour of the goods sold. These practices are in addition to the broader supplier due diligence processes instilled by RMIT.

In 2022, a consolidation of uniform purchasing for STEM College included significant weighting on supply chain transparency and sustainable procurement in vendor evaluation and selection. The result has significantly lowered the risk of Act contravention in the College's uniform sourcing process as well as ensured uniform supply chain transparency for RMIT.

More broadly we identified that merchandise bought independently by student clubs does not constitute a material risk. It does, however, present an opportunity to educate students on ethical procurement processes, which we do through key events such as Sustainability Week and Fashion Revolution.

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.

Actions Taken

As a Fair Trade University since 2009, RMIT preferences products that maintain a third-party certification that provides for fair and equitable protection of food producers, namely Fairtrade certified products. 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, industry-specific factors driven by the casual and seasonal nature of this work. Certain goods, such as seafood, dried fruit and nuts, coffee, palm oil, cocoa, coconut, and rice are 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 are treated as RMIT tenants and therefore operate outside of our centralised procurement practices.

Actions Taken

Contractual arrangements are in place with our on-campus retailers via our Licence to Occupy agreement. In 2021 a gap was identified that the agreement template speaks to legal compliance, but did not include clauses specific to modern slavery risk, human rights, or fair working conditions for retailer personnel.

The Legal Team updated our licence documents in 2022, and in addition 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 and Fair Trade policies.

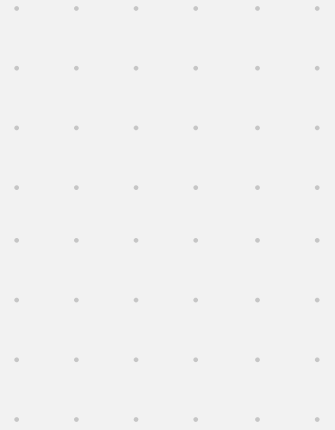
Actions taken across other procurement categories

Travel Management Services Agreement puts the onus on the supplier to be responsible for human rights compliance for itself, the supplier's personnel and the supplier's supply chain participants. They have to notify RMIT promptly or within 10 days of becoming aware of any human rights breach and they are obligated to cooperate and assist RMIT in any investigation or legal proceedings in relation to any actual, alleged or suspected breach. Similar clauses are also in the process of being incorporated into existing IT agreements by criticality.



Our Philanthropic Investments





A tertiary education can transform the lives of students, giving them the opportunity to access knowledge and pursue their passion.

RMIT Philanthropy connects the University's 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.

To effectively manage and further the impact of donations, the executive-led Philanthropy Committee is responsible for managing the RMIT Philanthropy Fund, including implementing the RMIT Responsible Investment Principles.

As of 31 December 2022, we held \$93.1 million in philanthropic funds across a range of investments, including equities, bonds and cash.

One hundred per cent of the equity component of our philanthropic funds are 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, with a 60% reduced exposure to carbon emissions compared to the MSCI ACWI ex Australia Index.
- **Russell Investments Australian Responsible Investment ETF:** a fund that invests in Australian shares and trusts listed on the ASX that also excludes companies with fossil fuel reserves.

Additionally, RMIT utilises a small component of its philanthropic funding to undertake 'impact investing' which is an investment designed with the intention of generating a measurable, beneficial social or environmental impact alongside a financial return. Since 2019, RMIT has been working with Skalata Ventures, a not-for-profit organisation that runs an independently funded seed program to scale and grow early-stage companies into significant and sustainable businesses. This fund supports future pathways and seed investments for the start-up community such as those which are developed through the RMIT Activator 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 the 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.

The RMIT Responsible Investment Principles guide our investment managers, to ensure that our 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, including human rights and modern slavery. We will also monitor the portfolio in relation to globally accepted norms on corporate sustainability behaviours to ensure we meet our commitments to the UN Global Compact.

RMIT also requires our investment managers engaged 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 environmental, social and governance issues and to support signatories in integrating these issues into investment and ownership decisions.

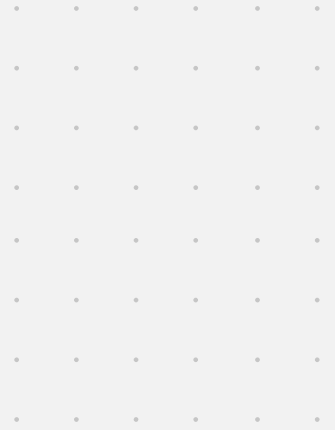
During 2022, RMIT did not perform a dedicated modern slavery risk assessment on our portfolio of investments due to our indirect investment structure. Despite the absence of a modern slavery risk assessment, we have deemed the inherent risk of modern slavery within our investment holdings to be low, considering the responsible investment screening practices in place throughout the year.

RMIT's external investment manager Russell Investments publishes its own Modern Slavery Statement which can be found online. In December 2022, Russell Investments became a signatory of the Investors Against Slavery and Trafficking Asia Pacific (IAST APAC) group. It is an investor-led, multistakeholder project that was established to engage with companies in the region to promote effective action in finding, fixing and preventing modern slavery in operations and supply chains. IAST APAC comprises 37 investors with AU\$8.2 trillion in Assets Under Management (AUM), together with the Australian Council of Superannuation Investors (ACSI), Walk Free and the Finance Against Slavery and Trafficking (FAST) initiative. Walk Free and FAST support IAST APAC as knowledge partners with financial sector and modern slavery subject expertise.



Grievance reporting and remediation





Our Whistleblower Procedure is our primary mechanism 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 protecting the person making the report. We continue to operate an externally managed whistleblower hotline, via our third-party vendor Stopline. In 2022, we did not receive any whistleblowing allegations or complaints that alleged breaches of the modern slavery Act.

The most recent internal audit (2021) into the management of complaints recommended that further frameworks and improved reporting should be developed as part of the new centralised digital complaints management system.

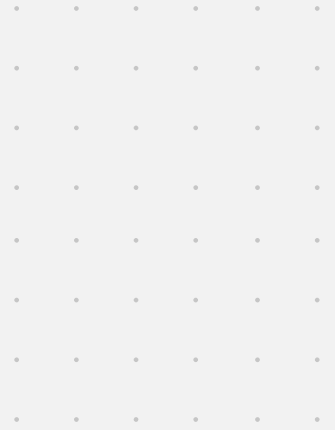
As part of this new system, the category of “modern slavery” will be added to the topics able to be selected by complaint handlers. The addition of this category will allow RMIT to easily and quickly identify areas of action specifically regarding modern slavery issues. This reporting will also be provided to ARMC as part of the continuous improvement program of work in the complaint management portfolio. We will also be introducing a global public-facing complaints portal, where anyone will be able to anonymously lodge a complaint regarding allegations of modern slavery breaches.

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.

We have identified the need to develop dedicated procedures to effectively respond to instances of modern slavery in our operations or supply chain. At present, any such instances would be responded to in accordance with our existing policies and procedures, however, this has been identified as a focus area for future action.

Our Impact





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.

One such example of the positive impact the University can have through research and industry outreach is the RMIT Business and Human Rights Centre (BHRIGHT). Located in the College of Business and Law, the Centre addresses the human rights impact of business through research, education, innovation and collaboration. BHRIGHT is the first centre for business and human rights in Australia, running masterclasses, consultancies and design labs to generate and share innovation and train current and future leaders to develop and integrate human rights standards in their respective industry contexts.

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. Their work includes:

- Influencing law reform and public policy – proactively participating in law reform and public policy debates.
- Training and capacity building – running master classes, consultancies and design labs to generate and share innovation as well as train current and future leaders to develop and integrate human rights standards in their respective industry contexts.
- Evidence of business impact – conducting empirical studies to build evidence of human rights and business impact.
- Analysis of contemporary business and human rights problems – using a range of conceptual frameworks and methods in analysing contemporary problems in business and human rights.
- Human rights in business education – promoting human rights in business education through the Global Network of Business Schools for Human Rights.
- Engaging critically with existing corporate social responsibility, accountability and broader business literature – advancing methodological and theoretical development, providing editorial leadership in relevant journals

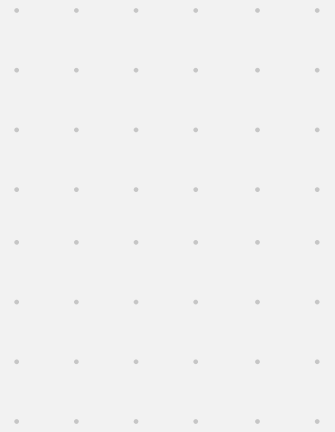
Examples of work from BHRIGHT in 2022 include:

- The launch of a new joint [research report](#) into Australia's Modern Slavery Act. 'Broken Promises: Two years of corporate reporting under Australia's Modern Slavery Act', which examines the second year of corporate statements submitted to the Australian Government's Modern Slavery Register by 92 companies sourced from sectors with known risks of modern slavery. BHRIGHT Director Shelley Marshal was the co-author of the report, which found that companies are still failing to identify and address major risks in their supply chains. Broken Promises is the follow-up to the report released earlier in the year, 'Paper Promises? Evaluating the early impact of Australia's Modern Slavery Act'.
- The [report](#) 'Stitching together a future - Myanmar's garment workers fight for their lives against COVID-19 and a military coup' - is authored by BHRIGHT's Sara Tödt and CARE International. It presents unique data on the experiences of garment workers in Myanmar during a time of crisis and change. It depicts the dire impact of the military coup on garment workers, their families and their livelihoods, compounding the already severe effects of the global economic recession resulting from the COVID-19 pandemic. The report outlines what garment workers need from international stakeholders at this time of crisis and suggests actions that garment brands, as well as unions and non-government organizations (NGOs), can take to support them.



Index





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

Criteria	Reference
Identity of reporting entity	Page 2
Description of structure, operations and supply chains	Page 5-9
Description of identified modern slavery risks	Page 17-34
Description of actions taken to assess and address modern slavery risks	Page 11-37
Description of how the reporting entity has measured the effectiveness of those actions	Page 11-37
Description of the process of consultation with owned or controlled entities	Page 2, 6-7, 15
Other relevant information	Throughout

