



Modern Slavery Statement

2025

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Acknowledgement of Traditional Owners

Griffith University (Griffith) acknowledges the wisdom inherent in Aboriginal and Torres Strait Islander Australians as the oldest surviving culture in the world and recognises their custodianship of the land on which its campuses are located. The University strives to be a place where Aboriginal and Torres Strait Islander peoples are valued and respected, and where First Australian Peoples' cultures and knowledges form an integral part of Griffith's vision for social justice and creating inclusive and diverse communities. Griffith recognises that reconciliation is a shared process and that every student and staff member has a role to play in effecting positive change for a better, more inclusive Australia.

Message from the Vice Chancellor

Griffith University remains steadfast in its commitment to uphold human rights and eliminate modern slavery across our operations and supply chains. In accordance with our values, we recognise that addressing modern slavery is a shared responsibility requiring vigilance, collaboration and transparency.

In 2025, we continued to strengthen our approach through sector-wide engagement and partnerships that amplify our impact. Collaboration with peers, civil society organisations and industry stakeholders has enabled us to respond to emerging risks and support ethical practices globally. These efforts reflect Griffith's dedication to creating a fair and sustainable future for all, consistent with our strategic vision and social justice principles.



Modern slavery is a complex and evolving challenge. Our work in this space is ongoing and deeply embedded in our governance and procurement frameworks. By maintaining strong relationships and leveraging collective capability, we aim to drive meaningful change and protect the rights and dignity of all individuals within our operations and supply chains.

This is Griffith's sixth Modern Slavery Statement pursuant to its obligations under Section 13 of the *Modern Slavery Act 2018 (Cth)* (the Act).

Professor Carolyn Evans
Vice Chancellor

Introduction

Modern slavery is a serious crime and Griffith University has a zero-tolerance approach to slavery, exploitation, human trafficking in all its forms, and child labour. The University is committed to safeguarding human rights in its operations and supply chains, as well as taking concrete steps to identify, mitigate and respond to risks that have the potential to cause, contribute to or directly link the University to modern slavery.

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery can take many forms¹, including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour.

Modern slavery globally

An estimated 50 million people were living in modern slavery on any given day in 2021. This is nearly one in every 150 people in the world. Modern slavery hides in plain sight and is deeply intertwined with life in every corner of the world².



Figure 1: Estimated people living in modern slavery

Modern slavery in Australia

The latest statistics from the Australian Federal Police (AFP) show a significant rise in human trafficking and modern slavery reports across Australia during the 2024–25 financial year.

Here are the key figures:

There were 420 reports of human trafficking and modern slavery, a 10%³ increase from the previous year (382 reports) and nearly double the number from five years ago.

Breakdown by Type, year on year.

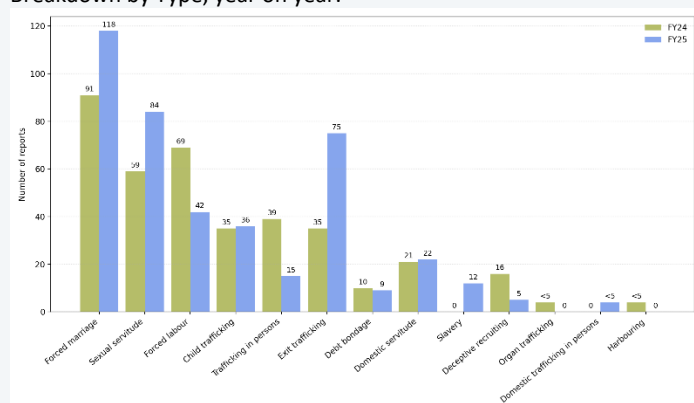


Figure 2: AFP Statistics 2024 - 25

¹ [What is modern slavery](#), viewed 13 January 2026

² [Walk Free Global Slavery Index](#), viewed 20 October 2025

³ [New figures show modern slavery persists across Australia in diverse forms](#), viewed 20 October 2025

Observations

- Exit trafficking and forced marriage reports had the most significant increases, attributed to improved community engagement and outreach programs like the Human Exploitation Community Officer (HECO) initiative.
- The increase in forced marriage reports may indicate the AFP engagement and presentations to at-risk community groups is working, and people feel more comfortable reporting this activity.
- More than 90% of exit trafficking victims are female, highlighting gendered vulnerabilities.
- The AFP emphasises a victim-centric approach, focusing on prevention, disruption and education rather than solely prosecution.

About Griffith University

For 50 years, Griffith has been a purpose-driven, values-led university focused on creating impact where it matters most. Since its founding in 1975, Griffith's teaching and research have been shaped by a commitment to:

- social justice
- inclusive access to education
- environmental sustainability.

These ideals remain central as Griffith enters the second half of its first century as a globally recognised university of excellence. The university is now placing purpose, people, partnerships, and communities at the heart of everything it does. Griffith's contributions include:

- pioneering research
- support for Indigenous flourishing
- student entrepreneurship
- expanding access to education through online learning.

With more than 45,000 students, Griffith spans five locations across South East Queensland, and is home to a global alumni network of over 250,000 graduates.

Ratings and rankings

Griffith ranks among the world's best universities.



Measuring our success

Griffith's stance against all forms of exploitation continues to be aligned with the United Nations Sustainable Development Goals (SDGs), particularly:



Goal 8: which focuses on promoting sustained, inclusive and sustainable economic growth, full and productive employment, and decent work for all.

Goal 12: as it is committed to upholding public procurement practices that are sustainable and in accordance with national policies and priorities.

Goal 16: aiming to promote peaceful and inclusive societies for sustainable development, provide access to justice for all, and build effective, accountable and inclusive institutions at all levels.

Griffith reports publicly against all 17 goals in its annual Sustainability Report, showcasing the University's comprehensive approach to sustainability and social justice. Griffith was ranked 2nd nationally and 4th globally for its performance against the United Nations' Sustainable Development Goals (SDGs) in the Times Higher Education (THE) Impact Rankings 2025.

Our community

Our local communities have access to a wide range of Griffith facilities and services.

 Sport Join a club or use our sporting facilities	 Health Attend our dentistry, psychology and allied health clinics	 Library Members of the local community are welcome to join our library	 Concerts Check out our calendar of public events at the Queensland Conservatorium
 Experts Connect with our research expertise via Griffith Experts	 Venue hire Hire a room at our campuses	 Sustainability Learn about our commitment to sustainability	 Galleries Attend a range of exhibitions open to the public

CRITERION 1

The reporting entity

This statement is made on behalf of Griffith University, and its non-operational subsidiary International Water Centre Pty Ltd. Griffith University (ABN 78 106 094 461) is a statutory body established under the *Griffith University Act 1998 (Qld)*. Its principal office is at Parklands Drive, Southport QLD 4222.

In the 2025 reporting period, Griffith University's revenue was over A\$1 billion. It therefore qualifies as a reporting entity under the *Modern Slavery Act 2018* (Cth). Griffith University has no subsidiaries or joint ventures that meet the requirements to be a reporting entity in its own right.

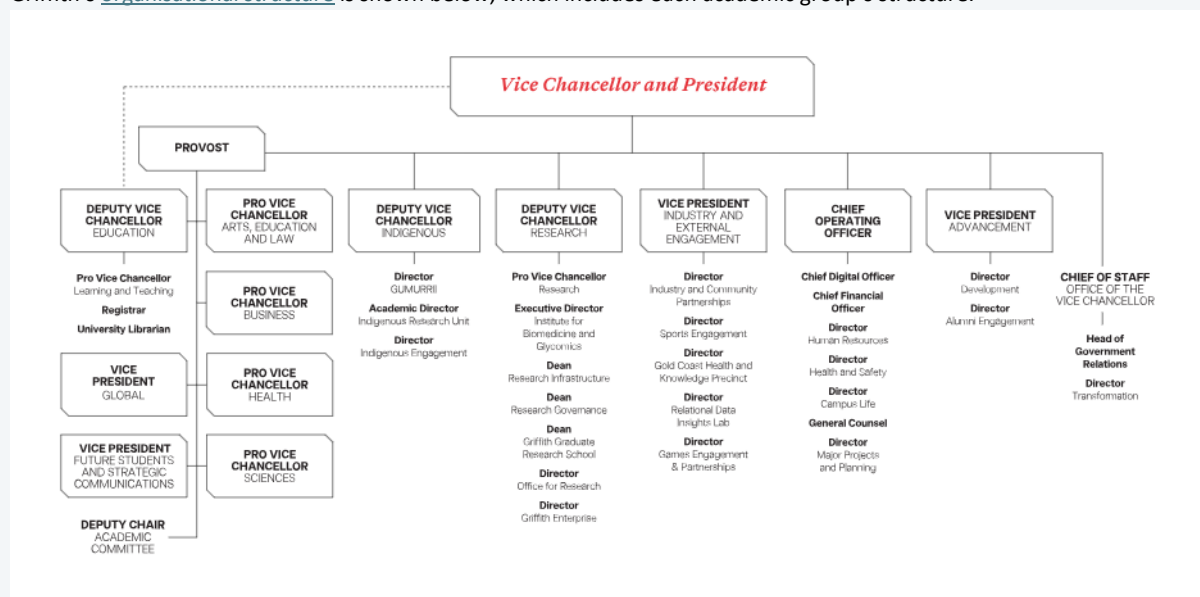
CRITERION 2

The University's structure, operations and supply chains

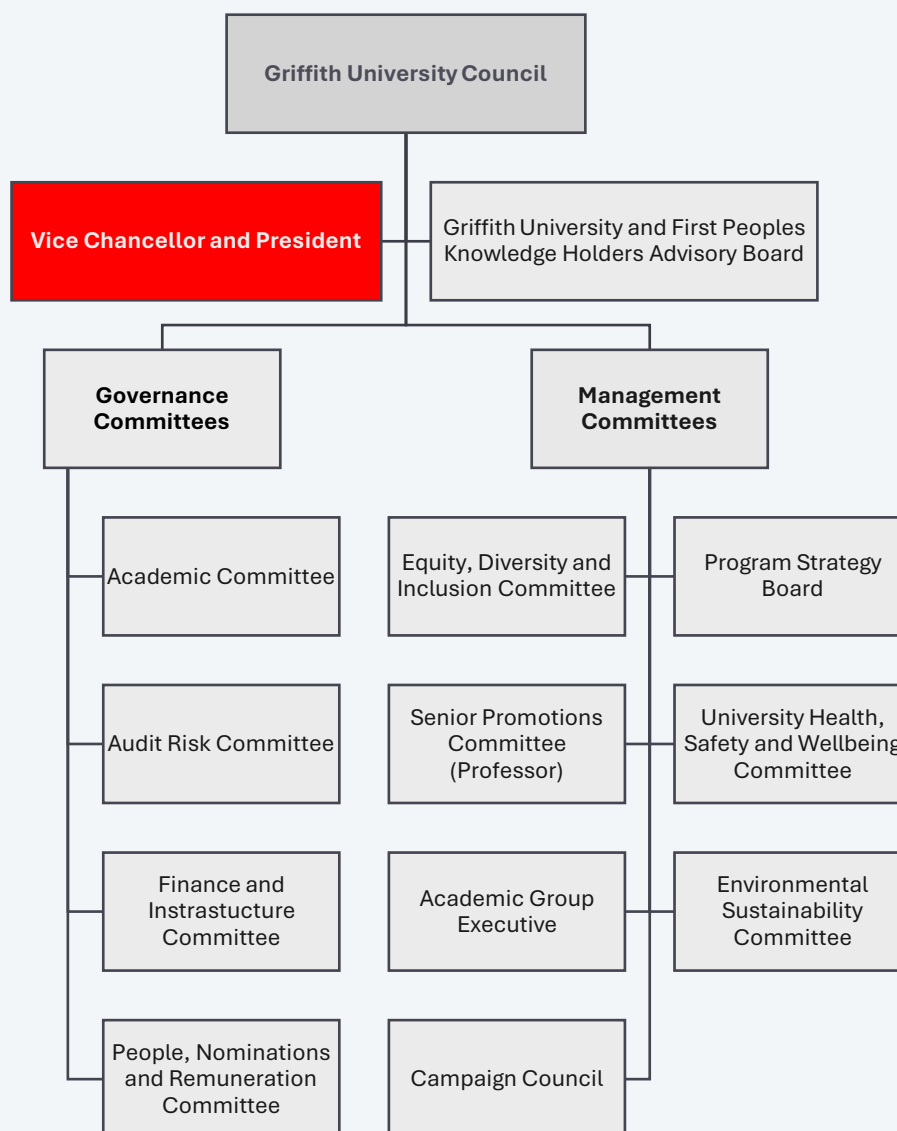
Structure

Griffith's governing body is the University Council, with two of its members elected as Chancellor and Deputy Chancellor. Council must appoint a Vice Chancellor who is the Chief Executive Officer of the University. Griffith's Council has delegated some of its powers to the Vice Chancellor, to various committees and to appropriately qualified Council members or staff members other than the Vice Chancellor.

Griffith's [organisational structure](#) is shown below, which includes each academic group's structure.



University Council



Griffith complies with the Universities Australia and University Chancellors Council Voluntary Code of Best Practice for the Governance of Australian Public Universities (amended May 2018). To learn more about Griffith's corporate governance, please refer to our Corporate [website](#).

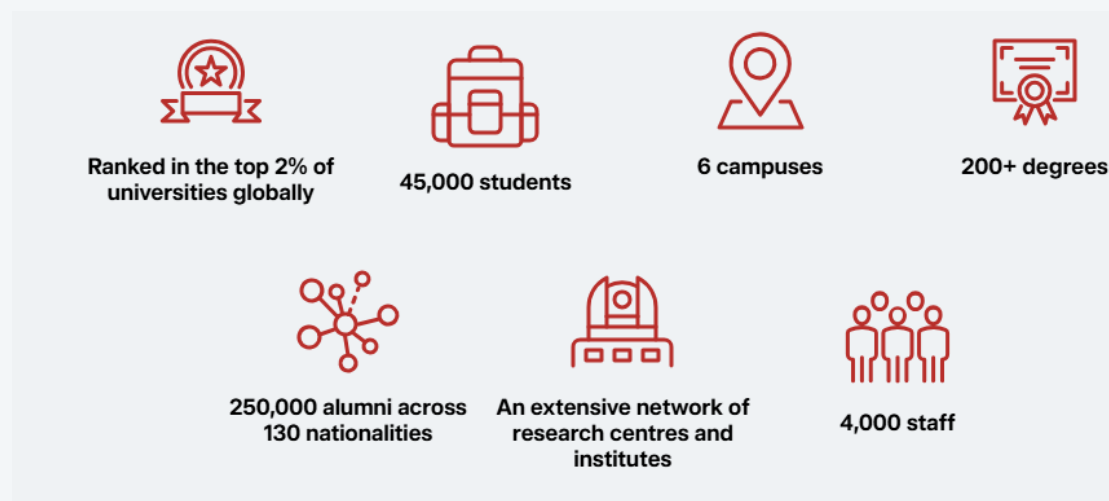
Operations

Griffith has operated in the higher education industry in South East Queensland since 1975. Griffith's higher education teaching and research has been shaped by a commitment to social justice, environmental sustainability and inclusive access to education. Today, those ideals are more important than ever.

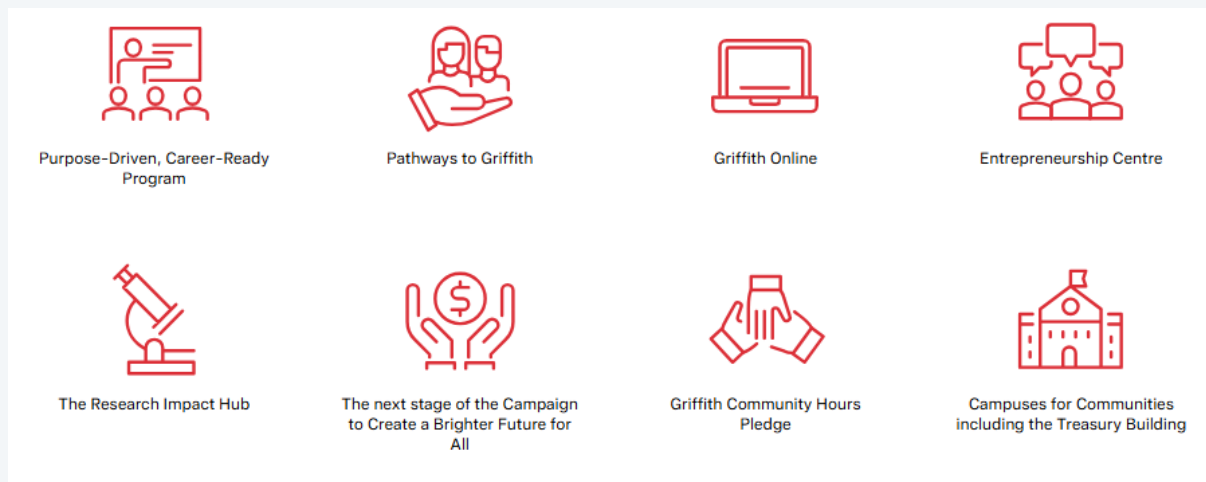
As we enter the second half of Griffith's first century as a globally recognised university of excellence, we're building on this legacy by placing purpose, people, partnerships and communities squarely at the centre of what we do.

Griffith also provides members of its community, and other third parties, access to health clinics.

Griffith at a glance



Griffith's strategy is backed by eight key initiatives that exemplify its core strategic commitments and to support student success, research impact, community engagement and the University's organisational transformation.



Areas of study

Griffith is organised into four academic groups (groups). Groups in turn are organised by schools or departments, research institutes and research centres.

The four groups are:

- Arts, Education and Law
- Griffith Business School
- Griffith Health
- Griffith Sciences

Griffith also has an array of administration services that support staff and students, as well as research, teaching and learning.

Griffith offer hundreds of degrees spanning 29 study areas:

 Accounting, finance and economics	 Allied health	 Architecture, construction and urban planning
 Arts and humanities	 Aviation	 Business, leadership and HR
 Criminology	 Dentistry	 Design
 Education and teaching	 Engineering	 Environment and sustainability
 Film and screen	 Healthcare leadership	 International relations and political science
 IT, analytics and cyber security	 Languages and English	 Law
 Marketing	 MBA and management	 Media and communications
 Medicine, pharmacy and medical sciences	 Music and performance	 Nursing and midwifery
 Nutrition and sports	 Psychology, social work and human services	 Science
 Tourism, hospitality and event management	 Visual arts	



Supply chain

Griffith engages with a wide range of suppliers who support our research and education operations. Griffith has five major procurement categories:

- Business Services
- Information Communication and Technology
- Labour and Professional Services
- Property, Construction & Facilities Maintenance
- Research and Teaching. and Equipment & Services.

In 2025, Griffith saw 4.5% increase in procurement spend. We purchased from 5,061 suppliers across 76 countries, including the following very high-risk countries from Griffith's modern slavery dashboard: Papua New Guinea, Pakistan and Nigeria. These high-risk countries account for less than 1% of the total spend and supply products and services within Travel, Student Recruitment and Research Consulting categories.

The majority of Griffith's goods and services (86%) were purchased from suppliers within Australia.

170 suppliers were assessed for modern slavery risks using our assessment tool and 40 improvement plans were initiated with those suppliers identified with a high to very high residual risk rating. 86% of the suppliers have completed their improvement plans.



\$371 M

total strategic procurement spend



5,061

suppliers over 76 countries

80%

of spend is with 261 Suppliers

Supplier count by country

The map below highlights Griffith's supply base by country. 86% of our suppliers are located or have a presence in Australia.

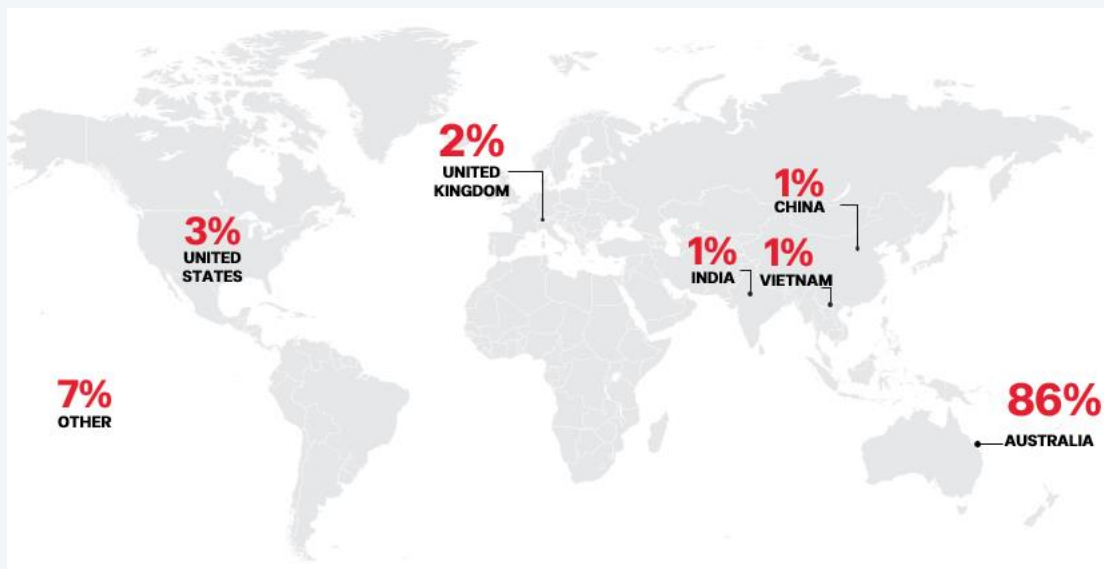


Figure 3: Supplier count by country

The Global Slavery Index from 2023 estimates the 10 countries⁴ with the highest prevalence of modern slavery are:

- | | |
|-----------------|-------------------------|
| 1. North Korea | 6. Tajikistan |
| 2. Eritrea | 7. United Arab Emirates |
| 3. Mauritania | 8. Russia |
| 4. Saudi Arabia | 9. Afghanistan |
| 5. Türkiye | 10. Kuwait. |

Griffith has seven suppliers across three of these countries, Saudi Arabia, Türkiye and UAE. They provide services in Event Management, Student Recruitment and Medical and Lab Consumables.

Supply count by category

This section summarises Griffith's strategic procurement supply by level 1 categories. Grouping suppliers by location and offerings, supports modern slavery risk management and increases transparency.

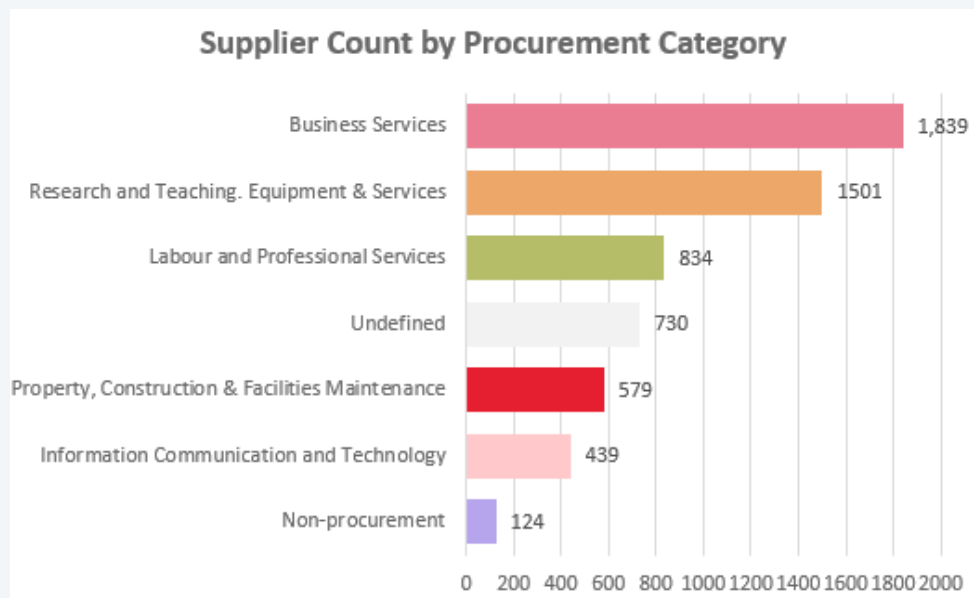


Figure 4 Supplier count by procurement category

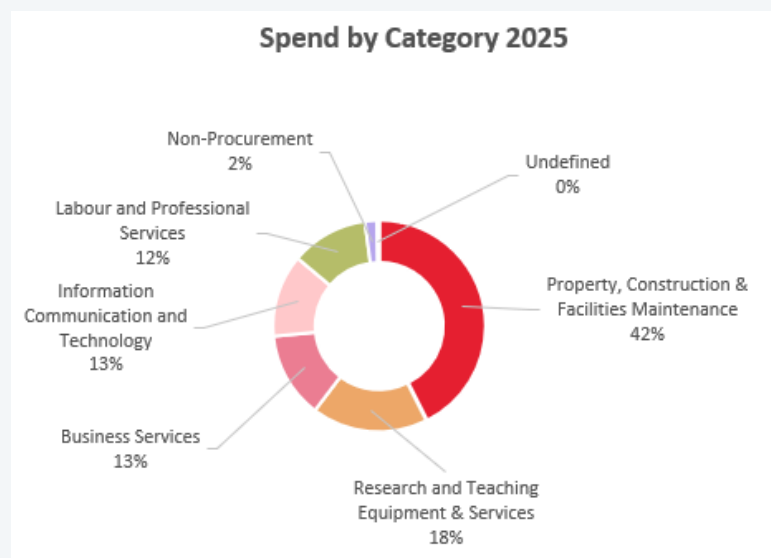


Figure 5 Spend by category 2025

⁴ The Global Slavery Index 2023, viewed 21 October 2025

Modern slavery governance structure

In 2025 Griffith dissolved their Modern Slavery Taskforce and established a Modern Slavery Working Group. The working group is chaired by the Chief Financial Officer (CFO). The working group brings together experts from across the university, including student representatives and specialists in ESG and human rights, technology, construction, risk and legal.

Strategic Procurement and Supply (SP&S) manage the annual modern slavery action plan. Any matters requiring escalation are managed by SP&S with the CFO.



Figure 6 Maturity Model Elements

Griffith continued to adopt its Modern Slavery Maturity Model, developed in 2023, that aligns with the United Nations Guiding Principles on Business and Human Rights (UNGP).

It consists of two primary elements:

- **Framework:** This component presents five stages of maturity that intersect with the UNGP, outlining specific actions for each level. This framework was crucial in assessing the initial stance in combating modern slavery and in steering Griffith's advancement towards more sophisticated measures.
- **Diagnostic tool:** Griffith used a self-evaluation tool, designed to pinpoint a baseline maturity level. It played a key role in identifying the current status, defining the objectives and clarifying the steps required to fulfill those goals.

Implementing this model and diagnostic tool was pivotal in shaping the University's approach to modern slavery, aimed at mitigating and addressing the risks identified in Griffith's operation and supply chain, and progressively refining the

approach to modern slavery. Each element of the UNGP includes internal and external-facing actions to guide organisations in integrating modern slavery and, more broadly, human rights considerations into their business operations.

These actions are summarised below:

POLICY COMMITMENT	GOVERNANCE	DUE DILIGENCE	REMEDATION	ISSUES OF CONTEXT
Policy suite	Accountability and responsibilities	Risk identification	Remediation mechanisms	Compliance with local laws and International Human Rights standards
Stakeholder engagement	Communication	Risk assessment		
	Continuous improvement	Leverage and supply chain collaboration		
		Capability building for internal stakeholders		
		Capability building for external stakeholders		
		Monitoring and review		
		Reporting		
		Grievance		

Figure 7 Maturity Model Element Actions

The risks of modern slavery in our operations and supply chains

Griffith's approach to modern slavery risk

Griffith uses four key focus areas to assess risks of modern slavery. These key focus areas are defined in Figure 8 and have remained the same from our 2024 statement. Supplier Assessment Questionnaires (SAQ) continue to be used to assess risks associated with existing and new suppliers. Griffith continued to participate in a pilot with the Australasian University Procurement Network (AUPN) to conduct a sector-wide risk assessment on Laboratory Consumables and Medical Equipment.

Figure 9 below is Griffith's Maturity Matrix. Griffith's maturity has increased from Proactive in 2024 to the Mature phase in 2025. The indicators for Mature phase include processes that are formalised, subject to continuous improvement and consistently understood. This ensures consistent practices and outcomes in response to the same events. Such processes are integrated into broader organisational processes. Griffith also ranked No. 1 out of 28 participating universities across Australia by the AUPN, achieving an overall score of 80% (the average score was 49%).



Figure 8 Modern Slavery KFA's

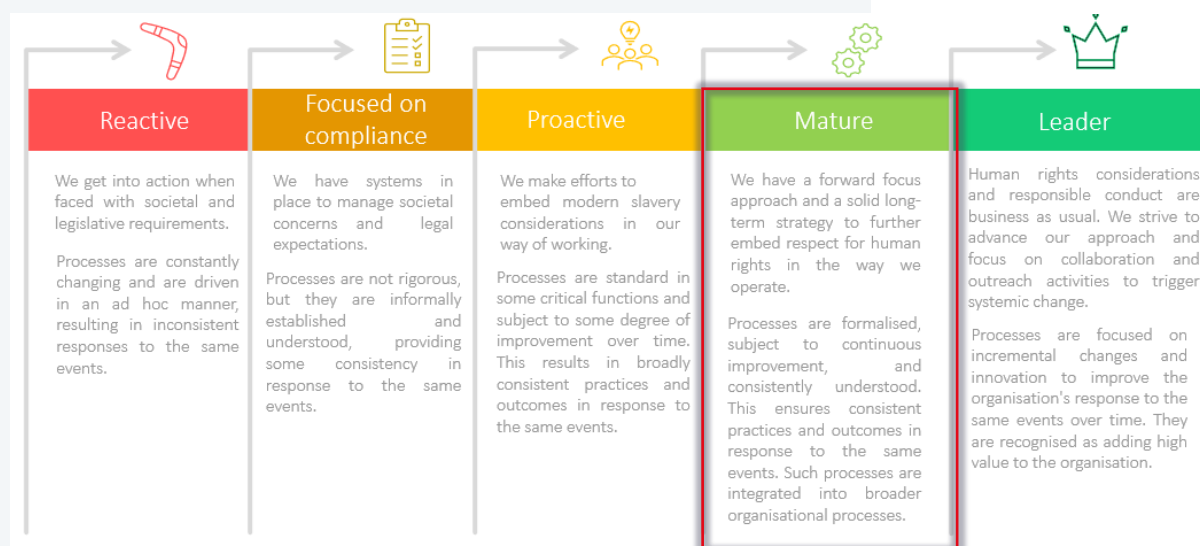


Figure 9 Maturity Matrix

Supply chain risks

Griffith engages with a wide range of suppliers and resellers for the procurement of our goods and services. Supply chains involving multiple tiers of international suppliers inherently carry higher risks and can include various forms of modern slavery practices, depending on the type of industry, raw materials, components and the countries involved in supply and manufacturing. It is therefore possible that Griffith may contribute or be directly linked to modern slavery risks.

Australia's regulatory environment, labour laws and enforcement mechanisms significantly reduce the likelihood of forced labour, human trafficking and exploitative practices compared to high-risk international sourcing regions. Sourcing domestically supports compliance with the *Modern Slavery Act 2018 (Cth)*, which requires businesses with revenue over AU\$50 million to report on modern slavery risks and mitigation efforts. Domestic suppliers are more accessible for audits, site visits and direct engagement. This facilitates better visibility and control over labour practices. Australian suppliers are more likely to understand and comply with ethical sourcing requirements, including supplier codes of conduct and grievance mechanisms. As highlighted in previous Griffith Supply Chain section, 91% of Griffiths suppliers are in Australia, which helps to reduce our risk.

The AUPN Modern Slavery Dashboard uses several global indices to rate the inherent country and industry risks. These risk ratings have been applied to all Griffith suppliers. In 2025, Griffith had 44 very high-risk suppliers and 2,085 high-risk

suppliers.

The following product categories are sourced from three of the top 10 high-risk countries, outlined in the Griffith Supply Chain section on page 3:

Saudi Arabia

- Student Recruitment Suppliers x 3
- Event Management Agency Services x 1

United Arab Emirates

- Student Recruitment Suppliers x 2
- Event Management Agency Services x 1

Türkiye

- Student Recruitment Suppliers x 1
- Food & Beverage Products⁵ x 1

While Griffith purchased goods and / or services from these high-risk countries, the goods and / or services were not in very high-risk categories and the spend was less than \$300K. The Event Management spend related to Marketing, Recruitment and Digital Campaigns, and Expos physically held in those regions. The Food and Beverage was a travel related expense for a conference. Griffith does not directly source goods and services from any of the other seven high-risk countries.

In addition to Griffith's ongoing efforts to assess the risks of new and existing suppliers, Griffith's focus in 2025 was on the following high-risk categories:

- Information Communication Technology
- International Student Recruitment Agencies
- Lab Consumables.

Griffith continues to work with Electronics Watch to monitor and identify manufacturing risks within our ICT hardware category.

Operational risks

Identification through grievances

Griffith's Modern Slavery Grievance and Remediation procedure provides an escalation path for modern slavery grievances to be received through the following channels:

- the University's internal or external reporting mechanisms, including Griffith University's Whistleblower Hotline called 'Your Call'
- internally by a staff member conducting due diligence
- through a third party such as auditors, contractors, civil society organisation's, trade union representatives, media outlets, researchers, or a member of the community.

University staff who become aware of modern slavery-related grievances are required to report them to the Manager (Integrity) or to Strategic Procurement and Supply Staff, in accordance with the Modern Slavery Grievance and Remediation procedure.

There is a risk of modern slavery within the Australian construction industry, particularly where subcontracted labour is used. Vulnerable workers, including migrants and temporary visa holders, are at a heightened risk of exploitation through underpayment, unsafe working conditions, and coercive practices. Despite the introduction of the *Modern Slavery Act 2018 (Cth)*, many companies fail to identify or address these risks adequately⁶.

During 2025 there were no modern slavery grievances escalated to the Integrity Manager or Strategic Procurement and Supply from within our operations.

Student risk

In 2024, Griffith students participated in the National Temporary Migrant Work Survey conducted by the Migrant Justice Institute. Griffith's survey results were released in 2025, which included responses from 346 Griffith University students. It revealed significant challenges related to employment conditions, wage compliance and modern slavery indicators, and highlighted operational risks faced by international students within the university sector.

⁵ Food and beverage expenses for a conference \$600

⁶ New report shows companies failing to comply with modern slavery laws, viewed 5 November 2025

Report Findings

- **Employment Conditions and Wage Compliance**

International students reported working in low-paid jobs, with many earning below the statutory minimum wage. The survey found that 27% of respondents were paid less than the basic minimum wage of \$23.23 per hour and 71% were paid less than the casual minimum wage of \$29.04 per hour. Additionally, a moderate proportion of students were paid in cash, which raises concerns about wage transparency and compliance with Australian employment laws.

- **Modern Slavery Indicators**

The survey identified several indicators of modern slavery among international students. Approximately 34% of respondents experienced one or more modern slavery indicators, such as unsafe working conditions, coercion and deception. These indicators suggest a heightened risk of forced labour and exploitation among international students.

- **Barriers to Reporting and Seeking Help**

International students face significant barriers to reporting underpayment and seeking help. Many students fear losing their jobs, visa-related repercussions, and retaliation from employers. Additionally, a lack of knowledge about their rights and how to take action further exacerbates these challenges.

Investment risk

Griffith's investment funds are managed by the Queensland Investment Corporation (QIC). QIC completed a Supplier Assessment Questionnaire in 2025, based on their SAQ, no further action was required.

CRITERION 4

Griffith's actions to assess and address the risks identified Supply Chain Actions

Operational actions

Policy commitment

During the reporting period Griffith's Strategic Procurement and Supply continued to uphold the principles of its Modern Slavery [Policy](#).

Governance

Griffith's Anti-slavery Task Force had been in effect for four years. A review of the purpose of the Task Force was conducted, and it was decided to establish a Modern Slavery Working Group, headed up by the Chief Financial Officer. The working group consists of senior management staff across the organisation, to ensure effective cross-collaboration. The first working group meeting was held in December 2025.

Griffith continued to engage and collaborate with multi-stakeholder initiatives such as the AUPN and Electronics Watch to identify and address risks of modern slavery proactively and to explore new collaboration opportunities.

Training

Griffith's procedures require staff involved in strategic sourcing activities and contract management to have completed Griffith's eLearning Modern Slavery training module.

Supply chain actions

Sector-Wide Approach

Griffith actively participated in the AUPN Anti-slavery Program, where as a sector we continue to develop the maturity of our modern slavery practices and collaborate to eliminate modern slavery. We recognise that our operations and supply chains are complex and understand there will be unforeseen circumstances and challenges we need to address, as we continue to dive deeper into our supply arrangements.

The objectives and drivers of the Program are:

- reduce costs and resource duplication—by pooling efforts, tools and expertise across universities instead of each institution working in isolation
- collaborate on risks and issues for greater impact—building collective leverage with suppliers and stakeholders to drive systemic change
- work collectively to build capability and awareness across suppliers, staff and students and lead the sector in transparent, responsible supply chains
- contribute to reporting requirements—ensuring universities can meet their compliance obligations under modern slavery laws efficiently and consistently.

Based on United Nations Guiding Principles on Business and Human Rights, we applied due diligence prioritisation criteria to understand where, as a sector, we could have the biggest influence to leverage meaningful impact.

Three areas were identified:

- medical equipment and laboratory supplies in our supply chain
- electronics in our supply chain (Griffith was already a current member of Electronics Watch)
- international student risk in our operations.

Medical Equipment and Laboratory Supplier Approach

- Supplier Risk Working Group was established
- Selected sector category – Medical Equipment & Laboratory Supplies
- Sent 72 suppliers SAQs for deeper due diligence insights
- 47 suppliers completed (22% of category spend across the sector)
- 5 suppliers approached to participate in the pilot remediation plan process

Findings established that all five suppliers had a limited understanding of modern slavery, wanted to work with universities to improve transparency and reduce risk, and asked universities to provide guidance on action they could take. In response, the Program created a short, easy-to-use university supplier anti-slavery tool kit with six recommendations to improve modern slavery awareness and risks. Universities have access to this tool and can send it to suppliers as required.

International Student Recruitment

In 2025, Griffith extended the SAQ process to the high-risk suppliers within this category, with 30 of the 41 invited suppliers responding to the questionnaire. Of those, 11 had an overall residual risk rating of high. These assessments provided Griffith with an understanding of the processes, systems and mechanisms these suppliers use to identify, address and account for modern slavery in their own operations and supply chains. The suppliers with a high-risk rating were then invited to complete improvement plans to further develop their modern slavery practices.

Supply Chain Monitoring

Electronics Watch conducts independent monitoring of factories in Griffith's ICT manufacturing and component supply chain during 2025, using local civil society organisations for worker-driven assessments. The work provided independent evidence on labour risks affecting workers producing goods linked to major global ICT brands. Monitoring covers risks like forced labour, excessive working hours, discrimination and occupational health and safety. Please see Case Study 1 below for further details.

Supply Chain Assessments

Griffith continued to collaborate with Informed 365 on its supplier risk assessment platform to drive process efficiencies. The link to the assessment is embedded in Griffith's tender documents and modern slavery is included in evaluation criteria for impact procurement.

The insights gained from the assessments assisted in creating risk profiles for each supplier, spanning from very low to

high risk. These profiles became a key criterion of the supplier selection process, facilitating a more informed and ethically grounded procurement strategy.

During 2025, Griffith commenced assessing its existing supply base, who had not completed an SAQ. A total of 170 supplier assessments were completed this year, compared to 25 in 2024.

The inherent risk, (based solely on category and country risk of the 170 suppliers assessed in 2025), demonstrated that 85% had an inherent risk rating within the low to medium rating. After completing the SAQ, you can see from the residual risk graph below that the high-risk rating increased from 17% to 27%. This demonstrates the need for an SAQ process to uncover practices such as policy, governance, due diligence and remedy.

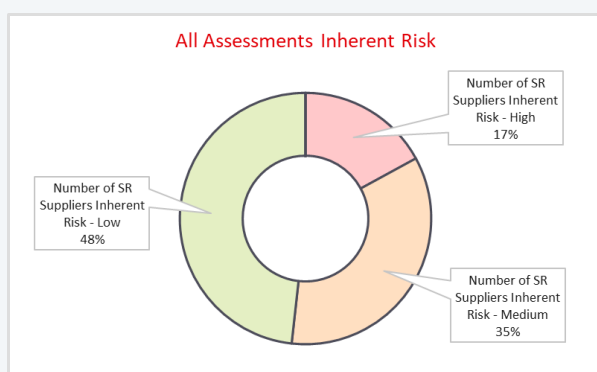


Figure 9: All Inherent Risk

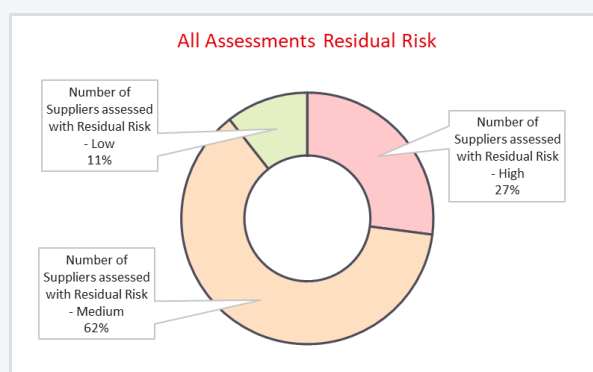


Figure 10: All Residual Risk

The high-risk category of International Student Recruitment was a key focus in 2025. A total of 41 suppliers were invited to complete an SAQ. The response rate was 73% with 30 suppliers completing the SAQ.

After completing the SAQ, the percentage of high-risk ratings reduced from 87% to 37%, demonstrating the suppliers had good policy and governance processes in place.

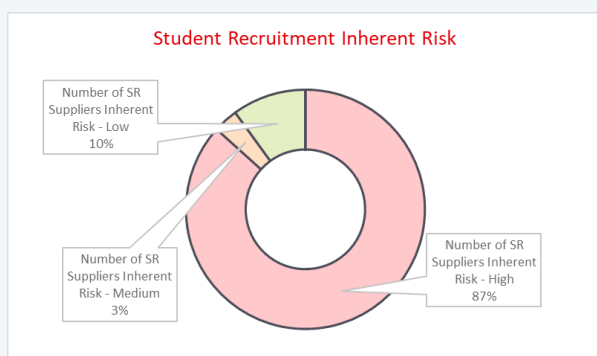


Figure 11: Student Recruitment Inherent Risk

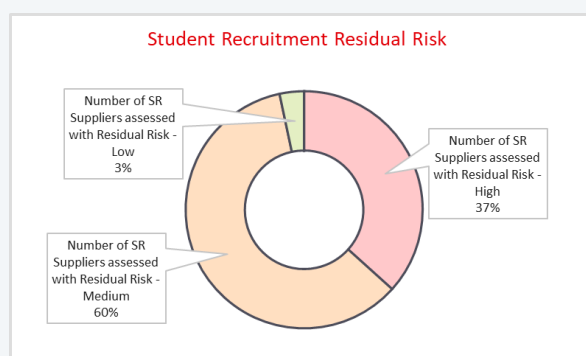


Figure 12: Student Recruitment Residual Risk

Griffith revised its improvement plan in 2025 and piloted the updated form with the International Student Recruitment Agencies. There was strong support during the process from the Director of International Marketing and their team of Regional Managers. There were 10 recruitment agents invited to complete improvement plans, and to date five plans have been completed. The agents have committed to activities such as developing modern slavery policies, performing screening of prospective suppliers, committing to implement ethical standards as part of their contractual arrangements, implement modern slavery training, and develop mechanisms for reporting suspected modern slavery. The improvement plans will be monitored as part of the Contract Management process, with accountability sitting with the Contract Managers within the business.

Key actions to support the process were included in Griffith's Contract Management Framework. Contract Managers are accountable for collaborating with high-risk suppliers on their improvement plan actions throughout the lifecycle of the contract.

Case Study 1

Identifying and remediating risk in ICT hardware

In 2025, Griffith continued to benefit from working with Electronics Watch, an independent not-for-profit monitoring organisation, to create greater transparency in our supply chain and combat modern slavery within its ICT Hardware category. Griffith's Digital Solutions team have provided Electronics Watch with a list of IT hardware model numbers purchased by Griffith. Electronics Watch then review the product list to establish if they have assembly factory or supply chain information related to the models. This partnership focuses on monitoring factories to identify and address violations related to modern slavery.

Electronics Watch's key monitoring mechanisms include:

- the use of local civil society organisations near production sites to conduct investigations
- factory workers can initiate complaints and participate in the development of solutions
- focusing on factories in Asia, Eastern Europe and Mexico.

In their 2024 Annual Report⁷, Electronics Watch saw a 7% increase in the number of contractors disclosing factory locations. 88% of the sites disclosed were at component level, pointing to growing market acceptance of traceability requirements.

Key findings across monitored sites

Persistent labour rights violations. Across multiple supplier locations, Electronics Watch identified excessive working hours, recruitment and employment risks, discrimination, wage concerns, occupational health and safety risks, forced labour indicators and instances of violence, harassment or intimidation.

Variation in case status. Monitoring outcomes included remediation in progress, cases suspended due to outdated evidence, findings awaiting a remediation pathway, and closed cases where most issues had been addressed.

Worker voice and union issues. Barriers to establishing enterprise-level unions were common. Some sites showed retaliation linked to union activity or a lack of required consent processes for overtime.

Migrant worker vulnerabilities. Several cases involved recruitment fees, debt risks or inadequate onboarding processes for migrant workers, with delays in corrective measures.

Challenges linked to data age and remote monitoring. Some cases were paused because companies were reluctant to act on older evidence. Worker testimonies remained central to identifying ongoing issues.

Remediation activity

Electronics Watch collaborated with monitoring partners, unions and the RBA to initiate audits, facilitate dialogue, press brands on purchasing practices, support investigations into recruitment and wage issues and improve transparency on audit outcomes. Some progress included reductions in excessive hours, compensation, commitments to repay wage arrears and chemical safety audits.

Overall assessment

Serious labour rights risks continue across ICT supply chains. Independent worker testimony is vital, and multi-stakeholder pressure is often needed to drive change. Remediation is multi-year and depends on brand leverage and supplier cooperation.

The data in Table 1 includes violations that have been monitored in recent years, including remediation work that may take several years to complete. The report provides limited detail because the activities to improve anti-modern slavery outcomes are sensitive and ongoing. The identification of these issues reflects progress in our work to reduce and eliminate modern slavery and the value in our partnership with Electronics Watch. This transparency gives all parties a chance to address the matters together.

⁷ [Electronics Watch Annual Report 2024](#), sited November 2025

Violation	No. Factories
Abusive termination of employment	4
Collective Bargaining	4
Discrimination in hiring & occupation	10
Excessive working hours	9
Forced labour	8
Freedom of Association & the Right to	4
Legal wages	7
Occupational health & safety	6
Recruitment & employment conditions	10
Violence & harassment	5
	67

Electronics Watch conducted monitoring activities at 24 factories, who supply electronic equipment for products purchased by Griffith. The monitoring focused on various aspects of modern slavery, including forced labour, excessive working hours, discrimination and occupational health and safety.

Griffith received quarterly monitoring status reports from Electronics Watch, which provide details of the working conditions and violations throughout 2025.

Table 2 details the status of the factory monitoring reports for 2025.

Table 1 Electronics Watch Factory Violations

Monitoring Status	Status Count
Case Suspended	5
Closed	2
Findings Available	2
Remediation in Progress	15
Grand Total	24

Table 2 Monitoring Status

Operational actions

International students

This work is a continuation of the National Temporary Migrant Survey conducted by the Migrant Justice Institute in 2024. It reflects Griffith's continued focus on understanding and reducing modern slavery risks affecting international students.

The Director of Griffith International attended the International Student Modern Slavery Risk Roundtable hosted at the University of Sydney's Camperdown campus on 3 September 2025. Representatives from 11 universities across multiple states participated, along with the following stakeholders:

- Migrant Justice Institute
- Australian Red Cross
- Fair Futures
- Australian Federal Police.

The roundtable was aimed at building a shared understanding of the unique modern slavery risks faced by international students (especially in the context of university recruitment and student welfare) and to identify how, as a sector, we can better safeguard students in our care. The session was facilitated by the NSW Anti-Slavery Commissioner, and it explored practical steps universities could take to strengthen student safety and wellbeing.

The workshop focused on due diligence in recruitment contracts with global international student recruiters, and expanded to a broader spectrum of student risks, by reflecting on feedback from AUPN members.

The roundtable included presentations and discussions, with Dr Cockayne challenging the group to consider a public statement acknowledging slavery's historical ties to Indigenous populations and universities.

Next Steps

- Development of a sector-wide guidance to be presented to university executives for endorsement.
- Formation of a working group to continue collaboration and produce tangible documentation.
- Emphasis on ongoing engagement, not a one-off event.

To mitigate this operational risk, Griffith is undertaking the following actions:

- **Enhance Awareness:** Increase awareness among international students about their employment rights and available support services.
- **Strengthen Support Systems:** Provide accessible and confidential reporting mechanisms for students to report exploitation and seek assistance.
- **Collaborate with Stakeholders:** Work closely with government agencies, community organisations, and other stakeholders to address the exploitation of international students and ensure compliance with employment laws.
- **Due Diligence:** Roll out the SAQ process for Work Integrated Learning and Work Placement employment providers.

By addressing these operational risks, Griffith can create a safer and more supportive environment for its students to report and seek help.

All University students have access to wellbeing assistance via Student Wellbeing and can report concerns about wellbeing and safety via Griffith's Safe Campuses site.

Onsite construction

Griffith continued to display its 'Speak Up If Something At Work Is Not Right' poster within its construction sites providing an avenue for workers to report hidden labour exploitation.

How Griffith assesses the effectiveness of our actions

UNGP	ACTION	ASSESSMENT EFFECTIVENESS
Policy Commitment	Continually reviewing relevant university policies and recruitment processes to ensure they reference Modern Slavery.	All policies and codes of conduct are relevant and compliant.
Governance	Continue to embed the Improvement Plan processes into Griffith's Contract Management of highest risk suppliers.	In 2025, Griffith completed a pilot of the Improvement Plan process within the Informed 365 platform.
Due Diligence	Conduct supplier questionnaires with student recruitment agencies.	Improvement Plans have been issued to high-risk suppliers. International Marketing have continued to maintain their strong SRM with suppliers, and modern slavery clauses and definition are built into education agent agreements. Agreements also include detailed information regarding conduct, performance, monitoring and corrective action.
	Continue to assess existing suppliers with high-risk supply chains using Informed 365.	Continued to collaborate with the Australasian University Procurement Network Anti-Slavery Program on sector-wide approaches to combat modern slavery. Griffith continued to assess its supply base for modern slavery risk. In 2025 we assessed 170 suppliers.
	Continue to use Informed 365 to assess suppliers' modern slavery risk during sourcing processes.	Griffith maintained inclusion of Modern Slavery supplier assessments under Impact Procurement within its tender response schedules. Supplier questionnaires continued to be completed using the Informed 365 Platform.
	Continue to promote scam awareness.	Griffith International worked with the AUPN Anti-slavery Program on the Migrant Justice Association Survey and actively participated in a roundtable.
	Build capability for staff by rolling out modern slavery training.	Staff involved in strategic sourcing, either as a Sourcing Lead or part of the Evaluation Panel are encouraged to complete Griffith's modern slavery training eLearning Module.

UNGP	ACTION	ASSESSMENT EFFECTIVENESS
	Create an awareness campaign during recruitment and onboarding of international students.	Griffith International participated in the International Student Modern Slavery Risk Roundtable and are actively working to enhance awareness, strengthen support systems, collaborate with stakeholders and implement due diligence requirements to create a safer and more supportive environment for its students to report and seek help.
	Continue to actively promote Griffith's grievance channels to contractors working on campus.	Grievance posters continued to be erected and maintained by Campus Facility staff. The posters provided onsite workers with access to the grievance line 'Your Call'.
Remedy	Continue to use Your Call as a mechanism for modern slavery grievances to be raised.	The Your Call line was monitored throughout 2025 by Griffith's Integrity Manager. There were no modern slavery related grievances received.
Issues of Context	Collaboration with key internal and external stakeholders to better understand risk in Griffith's supply chains.	Work with Student Life to increase awareness.

CRITERION 6

Consultation

This statement is made on behalf of Griffith University and its non-operational subsidiary International Water Centre Pty Ltd.

Declaration

This statement is made pursuant to section 13 of the *Modern Slavery Act 2018 (Cth)* and constitutes the Modern Slavery Statement of Griffith University for the year ending 31 December 2025.

The statement was approved by the Griffith University Council on 15 June 2026 and has been signed by the Vice Chancellor and President on 25 June 2026.

Professor Carolyn Evans
Vice Chancellor and President