



Charles Sturt
University

Modern Slavery Annual Statement 2026

Our values



Insightful

Understanding people
and the world



Inclusive

Stronger together



Impactful

Outcome driven



Inspiring

Leading for
the future



Charles Sturt
University

Charles Sturt University Modern Slavery Annual Statement 2026

This is Charles Sturt University's Annual Modern Slavery Statement pursuant to section 13 of the *Modern Slavery Act 2018 (Cth)* for the financial year ending 31 December 2025. This statement is made on behalf of Charles Sturt University and its controlled entities.

Acknowledgement of Country

Charles Sturt University acknowledges the Traditional Custodians of the lands on which we live, learn and work, and recognises their enduring connection to land, waters and communities. We pay our respects to Elders past and present. Guided by the principle of *yindymarra winhanganha* — the wisdom of respectfully knowing how to live well in a world worth living in — the University is committed to upholding dignity, respect and human rights in all that we do, including our efforts to prevent and address modern slavery.

Introduction

Modern slavery constitutes a grave criminal offence and a violation of fundamental human rights. It includes practices such as slavery, servitude, forced or compulsory labour, underpayment, and human trafficking. In each of these situations, individuals are exploited and deprived of their autonomy for personal or commercial benefit.

This Statement sets out Charles Sturt University's established and continuing commitment to maintaining systems, oversight and practices that prevent modern slavery risks and ensure that its operations and supply chains do not contribute to such practices. It also outlines the University's controls and ongoing improvements made during the 2025 reporting period, demonstrating a trajectory of continuous improvement in the assessment and reporting of modern slavery risks.

Criteria a) Reporting entity

Charles Sturt University is a statutory authority established under the *Charles Sturt University Act 1989 (NSW)* and is registered with the Australian Charities and Not-for-Profits Commission. The University is a registered public Australian higher education provider, lawfully operating in New South Wales and delivering courses of study both within Australia and internationally, in accordance with the *Higher Education Act 2001 (NSW)*.

For the purposes of this Modern Slavery Statement, references to “Charles Sturt University” include the University and its controlled entities: Charles Sturt Campus Services (CSCS) and the Charles Sturt University Foundation Trust.



Criteria b) Structure, operations and supply chain

Structure

Charles Sturt University is the largest regionally based university in Australia, with more than 36,000 students enrolled both on-campus and online. The University employs over 2,200 Full-Time Equivalent (FTE) permanent staff, with campuses in Albury-Wodonga, Bathurst, Canberra, Dubbo, Goulburn, Melbourne, North Sydney, Orange, Parramatta, Port Macquarie, and Wagga Wagga. Charles Sturt also delivers courses internationally through partnerships in Asia and digital learning platforms.

As the principal education provider across its regional footprint, Charles Sturt contributes significantly to community development. In addition to teaching and research, the University operates public-facing services including allied health and veterinary clinics, innovation and commercialisation activities, research consultancy services, and facilities hire.

Charles Sturt University operates two controlled entities:

- Charles Sturt University Foundation Trust, which supports the University's teaching, research, and community mission through philanthropic fundraising; and
- Charles Sturt Campus Services Limited (CSCS), which delivers cleaning and maintenance services to universities, schools, and commercial organisations.

Governance of modern slavery risk is supported by the Executive Leadership Team, the Finance and Strategy Committee, and the University Council, which collectively oversee risk management, procurement and compliance activities, including the development and approval of this Statement.

Operations

The University's primary activities centre on delivering high-quality tertiary education and undertaking research with regional, national and global impact. Charles Sturt offers a diverse portfolio of programs, including vocational education and training (VET), foundation pathways, micro-credentials, undergraduate and postgraduate qualifications, across a range of disciplines.

Under its 2030 Strategy, the University aims to be Australia's leading regional university, with a strong emphasis on graduate employability, research excellence and delivering regional impact at a global scale.

To realise this ambition, the University continues to invest in:

- strengthening and refining its course portfolio;
- developing contemporary and flexible learning models;
- enhancing student access, aspiration and equity pathways; and
- expanding its research capability.

In undertaking these activities, the University procures a broad range of goods and services necessary to support teaching, research, campus operations and student services.

Charles Sturt is committed to minimising modern slavery risks within these procurement activities and across all areas of its operations.

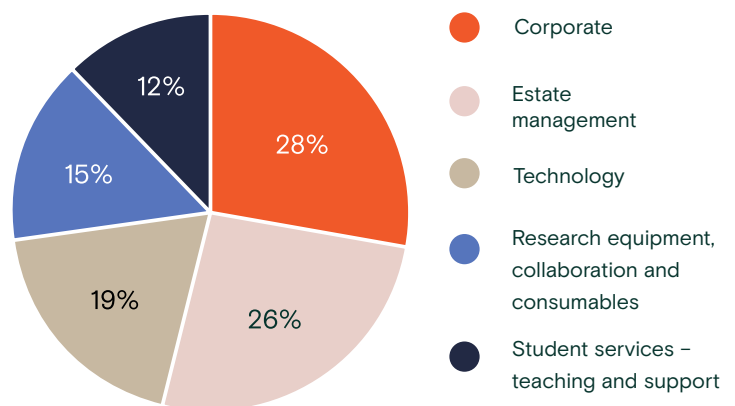
The University also receives financial support from external sources, including investments, grants, donations and philanthropic contributions, which assist in delivering its academic and research objectives. Appropriate oversight mechanisms are in place to reduce the risk that such funding sources are associated with modern slavery or other unethical practices.

Supply chains

In 2025, the University engaged over 3,200 suppliers to continue to support the delivery of high-quality education and research outcomes. Procurement is conducted in accordance with legislative obligations, as well as internal policies and procedures, with an emphasis on regional sourcing, sustainability, and ethical engagements.

Graph 1:

Distribution of procurement spend by category - 2025



Key supply chains include: construction services and suppliers, furniture and stationery, electronics (computers, audiovisual equipment, phones, etc.), food and catering supplies, travel services (flights, hotels and car hire), laboratory suppliers (small and large equipment, chemicals, consumables and pharmaceuticals, etc.), books and printing, and waste management services.

Goods and services are predominantly procured from regional suppliers across NSW (86%), while working within frameworks established by collaborative consortia, including the Australasian Universities Procurement Network (AUPN) and BuyNSW.

The frameworks established by these entities govern supply chains and procurement. Any preferred suppliers engaged through University-wide contracts must pass pre-qualification reviews on a range of criteria, including assessment for modern slavery risks within vendor supply chains and operations.

Supply chains identified as high-risk include computer software and hardware, apparel, laboratory equipment, catering, construction, security and cleaning. The University applies a structured due diligence framework to these supply chains (refer to Criteria d).

Cleaning

The University engages Charles Sturt Campus Services (CSCS) and other suppliers to provide cleaning services. As a controlled entity, CSCS maintains a robust suite of policies, including its Purchasing Policy (Plant & Equipment) and Modern Slavery Policy. Oversight by the CSCS Board of Management provides assurance that these policies and procedures align with broader University policy settings and expectations. Cleaning equipment and consumables are sourced through Unimarket, ensuring ethical sourcing practices.

CSCS employees are covered by an Enterprise Agreement negotiated with United Voice and ratified by the Fair Work Commission, ensuring compliance with Australian labour laws.

The University recognises the cleaning sector as high risk, particularly for migrant workers who may face exploitation through unauthorised subcontracting, underpayment, and poor working conditions. Accordingly, all cleaning service procurements must adhere to University policies designed to prevent such risks and uphold fair labour standards across its operations and supply chains.

Security services

Security services include monitoring building access, parking, CCTV cameras, alarms and security hardware. These services also pose elevated modern slavery risks, as personnel may be subject to wage withholding, visa insecurity, dangerous and substandard working conditions and limited visibility in subcontracting arrangements.

In 2024, the University re-tendered its security services contract to ensure strong compliance and governance measures were in place. The contract embeds clear requirements for accreditation, safety and training standards, rostering transparency, appropriate equipment, and an ISO-accredited Security Operations Management System (SOMS).

Monthly governance meetings between the University and its security provider ensure ongoing oversight of accreditation compliance, training and competency, employee wellbeing, wage assurance processes and adherence to safe work standards—actions consistent with emerging expectations for stronger due diligence and reporting under the evolving Australian modern slavery regulatory landscape.

Computer software and hardware and laboratory equipment

Computer software, hardware and laboratory equipment are primarily purchased through NSW State Government contracts, which are developed in accordance with modern slavery compliance practices. Additional measures include supplier engagement documentation and the University's contract management policy, which requires quarterly meetings with all high-risk vendors to assess compliance with labour standards from the outset of the contract.

Following a public procurement process conducted in 2024 to replace multi-campus network infrastructure that had reached end of life, the University applied strengthened due diligence requirements, including the need for vendors to directly address modern slavery risks within submissions. The resulting contract commenced in January 2025, and throughout the 2025 reporting period, the University successfully completed installation across all campuses, demonstrating effective implementation of the upgraded infrastructure and the due diligence commitments embedded during the tender process.

When considering modern slavery risk indicators in IT development and hosting services, the University prioritises the use of pre-approved Charles Sturt terms and conditions, which incorporate corporate social responsibility and modern slavery standards, for new and renewing IT suppliers. If a vendor's terms and conditions are used instead, a review by Legal Services is required, along with the incorporation of Charles Sturt University's standards and expectations for addressing modern slavery risks.

Procurement policies and practices: Prioritising value and sustainability

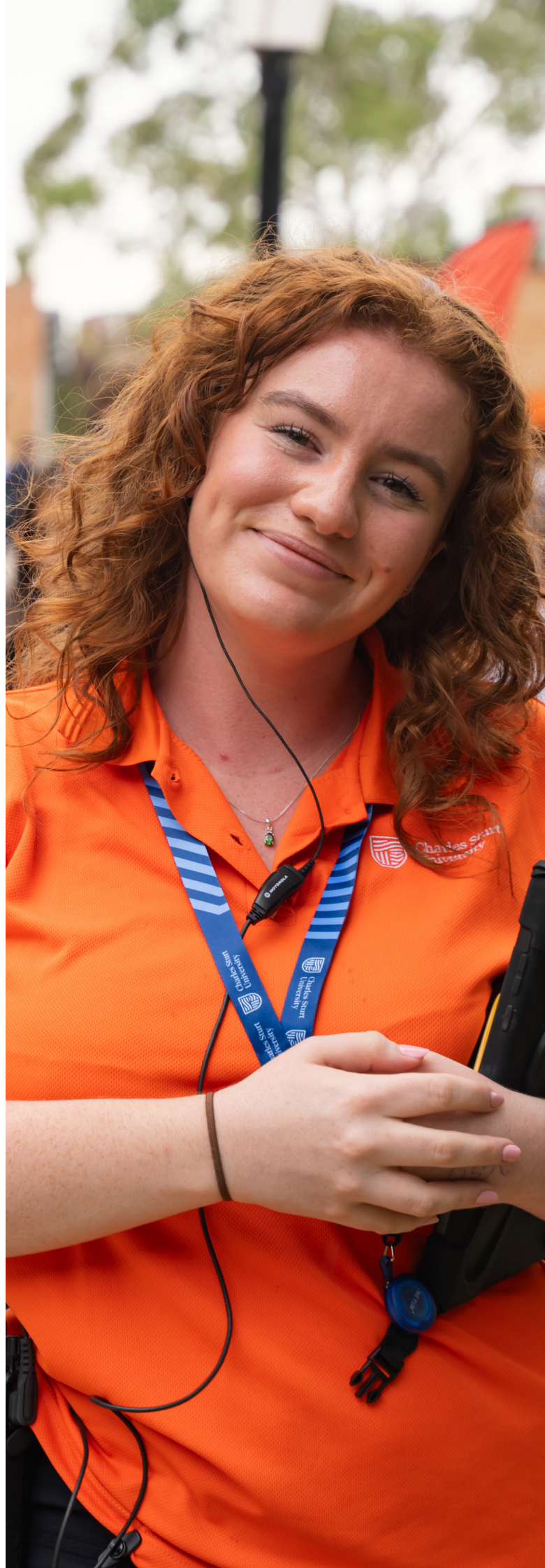
Modern slavery risk is a recognised consideration within the University's procurement framework, with a structured approach to supplier assessment, due diligence and ongoing engagement applied across the procurement lifecycle (refer Criteria d).

The University's procurement policies and practices are structured to enable local and First Nations supply chains to compete wherever possible. Value is assessed using a weighted matrix that considers quality, service, innovation and price.

During supplier engagement and tender processes, modern slavery statement reviews and assessments are embedded through procurement policies, tender documentation and evaluation criteria. The provision of modern slavery statements is mandatory for medium to large enterprises submitting bids or registering as new suppliers with the University. Vendors with modern slavery statements are identified within the University's procurement system and made visible to buyers at all times. A nominal weighted advantage within evaluation processes is given to small to medium enterprises that submit a modern slavery statement.

Vendor modern slavery statements are reviewed to ensure they include information regarding employee awards or enterprise bargaining agreements and are recorded within the University's procurement system. They are visible to buyers to support informed purchasing decisions.

Contractual controls reinforce these expectations, with standard University contracts including clauses outlining supplier obligations related to modern slavery, and third-party contracts reviewed by Legal Services to ensure appropriate provisions are in place.



Criteria c) The risks of modern slavery practices in the operations and supply chains of the University and its controlled entities

Supply chains

The University has identified a range of potential modern slavery risks across its operations and supply chains. These risks are most prevalent in the countries of origin of the goods or services procured, the sourcing of raw materials for these goods, and the labour used in manufacturing and shipping. Specific areas of risk include procurement of information technology, uniforms and items purchased by student clubs.

Cleaning services

The University recognises that the cleaning industry represents a higher risk for modern slavery due to:

- Outsourced labour: The reliance on third-party providers can lead to reduced oversight and potential exploitation of workers.
- Unauthorised subcontracting: Layers of subcontracting may obscure transparency, increasing the likelihood of exploitative practices.
- Vulnerable workforce: Migrant workers, who often comprise a significant portion of cleaning staff, may face challenges including language barriers, visa insecurities and limited awareness of their rights, making them more susceptible to exploitation.

Resources used in the generation of funds or investment returns

The University recognises that modern slavery risks may arise in (i) the sourcing of funds that support its research and teaching activities, (ii) the delivery of those activities, including through offshore and third-party arrangements, and (iii) the generation of returns from its investment portfolio. These are distinct areas with different risk profiles and are assessed accordingly.

In relation to research and teaching, risks may arise through partnerships, funding arrangements and delivery models, including offshore education partners and research collaborators operating in jurisdictions with varying regulatory oversight. These risks may include limited visibility over labour practices within partner institutions, third-party providers and research supply chains, as well as the potential for unethical recruitment practices associated with international student pathways.

The University also receives funding from a range of domestic and international sources, including research grants, partnerships and student revenue. While these funding sources are not inherently high risk, the University acknowledges the importance of appropriate due diligence to ensure that funding is not derived from activities or entities associated with exploitative labour practices.

In relation to investments, the modern slavery risk profile across these underlying assets is complex, with many involving exchange-listed companies with global operations and international, multi-tiered supply chains. Potential risks

in these areas include labour and other resources used in generating funds or investment returns, which are assessed in accordance with the University Responsible Investment Guidelines, Investment Policy and reporting obligations to the University Investment Committee, and Finance and Strategy Committee.

International student recruitment

International students can be particularly vulnerable to risks associated with modern slavery. Factors that can contribute to this vulnerability include language and cultural barriers; limited knowledge of Australian workplace rights and immigration regulations; concerns about potential loss of visa; the type of employment often undertaken by international students; and limited knowledge of, or access to, support from civil society, unions and governments.

International students are typically recruited with the assistance of an education agent, and while most education agents provide a highly professional and high-quality service, there are examples across the international education sector where this has not been the case. Primary risks relating to deceptive recruitment practice include students being provided with incorrect or misleading information about study in Australia, including the costs associated with study, their ability to work and the potential to migrate. The provision of fraudulent documentation or information, which misrepresents a student's true circumstances, is another key risk, together with the potential for students to be encouraged to engage in activity that may not be fully consistent with the conditions of their visa. These scenarios, unless effectively mitigated, all increase the potential for students to be placed in a circumstance of increased vulnerability once in Australia.

While these risks are most acute for onshore international students studying in Australia, the University also recognises that students studying at offshore partner locations may be exposed to different, but related, risks. While offshore students are not subject to Australian visa and workplace settings, the University acknowledges the importance of ensuring that recruitment practices and partner arrangements uphold equivalent standards of integrity, transparency and student protection.

Student working conditions

Universities play a critical role in promoting awareness among students of their workplace rights and the risks associated with exploitative labour practices. Indicators such as wage underpayment, excessive working hours, unsafe conditions and sexual harassment may signal heightened vulnerability to forced labour. Industries that commonly employ students – including retail, hospitality, horticulture and elements of the gig economy – are recognised as higher risk for such practices.

Students may be reluctant to report workplace exploitation due to concerns about losing employment, damaging professional prospects or, in the case of international

students, breaching visa conditions. Barriers to accessing clear information about rights and support services – including language, cultural or disability-related factors – can further increase vulnerability.

International students may face additional pressures, including visa limitations on work hours, financial stress associated with tuition and living costs, and constrained accommodation options. These factors can increase susceptibility to exploitative employment arrangements or substandard living conditions. Given the University's significant international student cohort, this remains an area of continued focus.

Charles Sturt University recognises that modern slavery risk extends beyond procurement and into the broader ecosystem in which students live and work. The University continues to strengthen measures aimed at mitigating risks within its supply chains and investments, while also equipping students with information and support mechanisms to safeguard their rights.

Work-integrated learning at Charles Sturt University

WIL placements may present risks where students are exposed to unpaid or unsafe work conditions, particularly in industries with known labour vulnerabilities. Charles Sturt University remains committed to ethical partnerships that align with modern slavery prevention frameworks.

Research partners and projects

The University acknowledges the potential risks of modern slavery in research partnerships and externally funded research projects. Potential risks in these areas are labour and other resources used in the generation of research or the distribution of research funding.

Charles Sturt requires organisations that collaborate with the University on a fee-for-service basis for research services to provide a copy of their modern slavery statement as evidence of good practice.



Criteria d) The actions taken by the University and its controlled entities, to assess and address modern slavery risks, including due diligence and remediation processes

The University maintains a commitment to proactively identifying, assessing and addressing modern slavery risks across its operations and supply chains. This includes establishing and continuously refining operating principles and behavioural expectations applicable to staff, students, affiliates, partners and suppliers. These expectations are supported by due diligence processes, contractual controls and governance oversight designed to mitigate risk and promote responsible conduct.

The modern slavery human rights framework is incorporated into University policies, procedures and governance for clubs, affiliations, finance management, finance procedure, learning abroad, philanthropic donations, gifts, research, investment, education agents and partnerships.

Governance and policy framework

The University embeds modern slavery controls across policies and governance structures.

The Modern Slavery Policy remains the central framework guiding the University's approach, supported by procurement, research, student, risk management and investment policies.

Supply chains

Supply chain due diligence and controls

To mitigate risks associated with high-risk supply chains, the University has implemented appropriate due diligence measures across its supply chain and in specific arrangements with individual suppliers and partners, including:

- Undertaking risk-based assessments and due diligence for suppliers who have, or may have, exposure to modern slavery risks. All responses to Charles Sturt tenders or requests for quote must include a copy of the organisation's modern slavery statement and/or address specific modern slavery, environmental, Indigenous procurement, and small-to-medium business integration questions.
- Undertaking enhanced due diligence reviews for material vendor engagements with external credit risk assessments, including modern slavery reporting reviews prior to engagement.
- Procurement reviews vendor-submitted modern slavery statements, which are then maintained within vendor profiles in the University e-procurement system, Unimarket, to support informed purchasing decisions.
- Ensuring Supplier and Partner agreements (contracts for services, consultancy agreements and purchase order terms and conditions) have specific clauses addressing modern slavery. The insertion of appropriate terms and conditions related to modern slavery into all relevant standard University contracts, and contracts provided by third parties are reviewed by the Legal Services team

and updated to include modern slavery clauses, where appropriate.

- Quarterly meetings with suppliers in high-risk categories, with modern slavery being a standing agenda item for those meetings.
- Collaborating with unions, legal advisors and relevant associations to ensure appropriate conditions.
- Reviewing enterprise bargaining agreements and labour conditions where relevant as part of procurement and contract management processes to identify and mitigate underpayment risks.

These practices are underpinned by the University's Modern Slavery Policy and related policies and procedures.

Supply chain monitoring and remediation

Charles Sturt University is dedicated to identifying, addressing and remediating instances of modern slavery within its supply chains. Where risks or incidents are identified, the University adopts a remediation-focused approach, working collaboratively with suppliers and broader supply chains to address impacts and support affected workers. Directly holding the supplier accountable for remediation may risk further income loss for former victims due to remedial actions. Therefore, the University will explore all avenues to ensure workers are not disadvantaged by changes in supply periods or quantities. Recognising the similarities in high-risk categories, the University seeks opportunities for consortium or peer remedial action.

Charles Sturt tender documentation now requires suppliers to provide mechanisms for raising grievances and complaints, with further enhancements underway through our procurement system provider to implement an in-system solution.

The risk of modern slavery on the University's campuses is low due to the embedded controls, systems, and practices the University has in place to manage recruitment and subcontracting. In compliance with contractual documents and purchase order terms and conditions, subcontracting is not permitted without prior consent. Payment terms are monitored and reported in the University's annual report, which assists in identifying vendors that have sufficient cash flow for wages. The University's governance structures and contract terms ensure that financial penalties are prohibited and short-term contracts and sudden changes in workload are avoided.

Charles Sturt University acknowledges the risks in the supply chains of goods and services it procures, especially given the global reach of the University and potential exposure to high-risk countries. Modern slavery is often hidden within legitimate industries, making it challenging to detect. The University aims to work collaboratively with the NSW Anti-slavery Commissioner, other universities, procurement bodies such as Buy NSW and AUPN,

civil society organisations and government agencies to share information and mitigate risks.

Charles Sturt actively engages with its purchasing consortia, Buy NSW, and the sector-led collaborative group, AUPN, to support the inclusion of modern slavery and corporate social responsibility questions and statements as part of collaborative procurement activities. For tendering and contracting activities, Charles Sturt University has amended its standard terms and conditions and continued to make improvements to supplier onboarding processes to ensure the potential for modern slavery is considered.

The University continues to review and update contracts, agreement templates and modern slavery clauses to reflect its commitment to addressing modern slavery in both new engagements and existing engagements seeking renewal. Charles Sturt University raises awareness of modern slavery among all staff by incorporating references to it into induction processes for procurement governance, providing additional training where required, including tailored guidance for staff using the University's e-procurement system on how to identify and report indicators of modern slavery. The University provides all staff with access to modern slavery information via the University website, and sets out the expectations for staff and others in the University's Modern Slavery Policy and related policies, procedures and guidelines.

The University identifies supply chains that represent a medium to high risk of modern slavery, human trafficking, forced and bonded labour and labour rights violations. This is accomplished by working with both suppliers and members of the sector purchasing consortia and taking appropriate action if the University becomes aware of such activity. In the area of donations and research funding, University policies require the identification of the funding source, along with statements from funders addressing the sustainability of the activities that the funding is for.

Cleaning and high-risk services

Oversight of cleaning services includes governance through the Division of Finance and Charles Sturt Campus Services (CSCS) Company Board structures (including its own Modern Slavery Statement). Services are governed via SLAs with regular monitoring and reporting provisions. Employment conditions for CSCS team members are outlined within an Enterprise Agreement negotiated with the United Workers Union and employee representatives, with compliance and administration provided through Charles Sturt's Division of People and Culture.

In instances where third-party vendors are engaged across metropolitan locations, contracts are managed through existing University procurement practices, with appointment and contract management administered by the Division of Facilities Management.

Work-integrated learning (WIL)

During the reporting period, the University strengthened the governance, oversight and support structures that safeguard students in WIL.

The University has formalised WIL partner compliance requirements through updated WIL Placement Delivery and Management Procedure and Quality WIL Framework documentation, embedding expectations around workplace safety, anti-harassment obligations and Fair Work Australia alignment within institutional policy.

Cross-faculty governance arrangements, including the WIL Working Group, provide consistent oversight of placement quality across all disciplines, enabling systematic monitoring and early identification of concerns, including indicators such as excessive hours, unsafe conditions or misuse of student labour.

WIL placements span a range of industries, including sectors recognised as higher risk for exploitative labour practices such as hospitality, retail and elements of the gig economy, and the University applies particular vigilance to placements in these contexts.

Recognising that unpaid placements may present ongoing risks of exploitation, the University:

- works with industry partners to ensure students are not used as unpaid labour beyond the scope of their learning.
- encourages paid placements where possible.
- monitors placement conditions through the InPlace WIL management system and student review processes.

Where concerns are identified, established escalation pathways enable timely intervention, including the capacity to suspend or withdraw a placement where conditions do not meet expected standards.

Students whose personal circumstances may increase vulnerability, including international students managing visa conditions, financial pressures and unfamiliar workplace norms, are supported through dedicated guidelines developed during this reporting period, which provide structured support and escalation processes that recognise additional barriers to identifying and reporting exploitation.

The University maintains:

- confidential reporting mechanisms for students.
- a WIL support site within its learning management system, providing accessible information on modern slavery risks and prevention, student rights in unpaid WIL experiences, and sexual harassment awareness and prevention in WIL contexts.

Staff capability in recognising and responding to modern slavery risks in WIL contexts has been strengthened through cross-faculty governance forums and WIL-specific guidance for staff involved in placement coordination and oversight. The University is also progressing supervised assessment approaches that reduce reliance on unsupervised contexts where students may be more vulnerable.

Charles Sturt continues to collaborate with peer institutions and sector bodies, including assisting in establishing the Regional Universities Network WIL Consortium, working with WIL Australia, and the World Association for Cooperative and Work-Integrated Education, to share and strengthen ethical placement standards nationally.

Student funding and internal controls

In 2025, the University strengthened oversight of student-managed funds, including the introduction of centralised expense management processes and enhanced controls over funding sources, reducing exposure to modern slavery risks. All expenditure relating to Student Club endeavours must be processed in line with standard University expenditure management and supply chain processes, with audited reconciliation and delegated approvals built into the system.

Investment practices

The University maintains Responsible Investment Guidelines and collaborates with investment managers to ensure adherence through annual reviews.

Comprehensive due diligence is undertaken in relation to Environmental, Social and Governance (ESG) guidelines before making investments. Additionally, annual assessments of individually managed mandates against ESG research and Responsible Investment Guidelines are conducted to further mitigate risks.

The University is developing mechanisms for reporting investment interactions and the analysis and removal of modern slavery risks. Training and communication initiatives will include flagging and reporting activities where people believe there is, or could be, a risk of modern slavery.

Empowering students with knowledge and support to access their rights

The University adheres to the provisions of the Commonwealth's Education Services for Overseas Students (ESOS) Framework, including the National Code of Practice for Providers of Education to Overseas Students 2018 (the Code). The Code includes, among other factors, provisions related to marketing information and practices (Standard 1), the recruitment of overseas students (Standard 2), and the management of education agents (Standard 4). The University has a variety of mechanisms in place to ensure compliance with the Code. In relation to education agents, the University maintains an International Education Agent Policy that sets clear responsibilities and procedures for agent appointment, contractual oversight, taking corrective action where necessary and for formal performance reviews.

As part of the University's international admissions processes, international students are considered against the Department of Home Affairs' (DHA) Genuine Student test, with further assessments – including document verification where required – of a student's financial, academic and English language capacity. Interviews are also undertaken, as required, to further explore a prospective student's circumstances. These mechanisms all provide a useful basis to identify and prevent scenarios that could result in increased modern slavery risk from eventuating. In addition to substantial internal checks and balances, the University also takes considerable steps to boost awareness of modern slavery risks to students and highlight the support that is available. These actions include:

- a dedicated modern slavery webpage, providing examples of modern slavery, details of the rights and protections

available to international students, and relevant links to information, including workplace rights.

- providing information about rights and protections to international students prior to their arrival in Australia, and as part of the University's international student orientation process.
- utilising social media, such as the University's international student support Facebook page, to provide ongoing reminders about modern slavery throughout the year.
- including modern slavery in the terms of reference for relevant committees, such as the Student Experience Committee for the University's third-party delivery partnership with Navitas, and the International Compliance Advisory Group coordinated by the Pro Vice-Chancellor (International).
- providing ongoing career management support through the Careers and Skills Hub services to international students throughout their time with the University; this includes support to help them understand their rights in Australia and what to expect in Australian workplaces. This is done through face-to-face activities such as appointments and workshops, as well as online resources.

As part of its actions to assess and address modern slavery risks, Charles Sturt University has embedded student safety, child safeguarding and gender-based violence (GBV) prevention within its broader due diligence and remediation frameworks. The University maintains integrated, trauma-informed support services for students who may be vulnerable to exploitation, including specialist counselling, wellbeing, advocacy and referral services. The University is committed to early identification of modern slavery and related risks and appropriate responses to such risks, and its activities in that regard are supported by clear child safety and safeguarding frameworks, alongside policies and procedures addressing child safety, sexual harm, personal relationships, conflicts of interest, family and domestic violence, and other forms of abuse.

The University provides targeted education and awareness initiatives to assist students to understand their rights, recognise indicators of exploitation or coercion, and access confidential reporting and support pathways. Where concerns are identified, established escalation, referral and remediation processes enable timely intervention and coordination across academic and professional areas. These actions are supported by strong governance arrangements, compliance with the ESOS Framework and the Code, and ongoing collaboration to ensure risks associated with unsafe working, living or learning environments are actively mitigated.

Sector engagement

The University continues to play an active role in sector initiatives, including participation in AUPN working groups and leadership forums, as well as collaborative sector programs aimed at strengthening responses to modern slavery risks across higher education supply chains.

Criteria e) The University's assessment of the effectiveness of its risk mitigation actions

Charles Sturt University is committed to continuous review and improvement of its practices to prevent and address modern slavery risks. This includes enhancing transparency across supply chains and fostering awareness among those working for and with the University.

The University assesses the effectiveness of its modern slavery mitigation actions through a risk based approach embedded within Charles Sturt's enterprise risk management framework and supported by a clear three lines model of accountability. Modern slavery risks are formally recognised within the University's risk management framework and are subject to defined governance oversight through established committee structures, ensuring modern slavery risks and controls are identified, assessed, monitored, and reported.

The University conducts a comprehensive modern slavery risk assessment process as part of developing its Modern Slavery Risk Management Plan. This process is led by the Risk and Compliance Unit in consultation with stakeholders in key areas such as: procurement and supply chain

management, Work-Integrated Learning (WIL), international students, donations and investment arrangements, clinical and research trials, research partnerships and collaborations, and arrangements with controlled entities: CSCS and the Foundation Trust. The risk assessment considers international agent arrangements, vendors and partnerships to ensure that all aspects of the University's operations and supply chains are thoroughly reviewed.

The effectiveness of modern slavery mitigating controls is assessed through the University's three lines model. Management (first line) assesses control effectiveness through ongoing monitoring and quality assurance processes. The Risk and Compliance Unit, as the second line, provides oversight and challenge on the effectiveness of modern slavery controls. The third line, Internal Audit, independently reviews and challenges the University's risk management controls, processes, systems, and data. Together, these mechanisms enable the University to maintain visibility over modern slavery risks and support the ongoing refinement of mitigation actions.

Criteria f) The process of consultation with controlled entities

The University's two wholly owned entities, the Charles Sturt University Foundation Trust (Foundation Trust) and CSCS, operate under applicable University policies and procedures and share the commitment to addressing modern slavery risks. Controlled entities are subject to relevant University policies and procedures, including those relating to modern slavery and procurement, and are included within the scope of the University's modern slavery risk assessment processes. They also receive training and communications related to modern slavery risks and management. This is further supported through centralised procurement management for all controlled entities, which provides greater visibility of supply chain risks.

CSCS also maintains its own policy framework, including procurement and modern slavery policies. Oversight by the CSCS Board of Management helps ensure these policies remain aligned with broader University policy settings and expectations.

The Foundation Trust has improved its guidelines to align with the University's funding and donations guidelines used in research.

Staff of the Foundation Trust and Charles Sturt University members serving on the CSCS Board have access to the University's modern slavery training and awareness resources. These include guidance on recognising and responding to modern slavery risks and information on the University's compliance obligations. Multiple reporting pathways are available, including anonymous reporting and the use of the University's incident risk management system, which is accessible to staff and students.

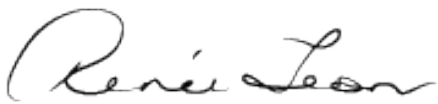
Criteria g) Any other relevant information

The University reviewed its Modern Slavery Policy in December 2025 to ensure it remains aligned with best practice and effectively mitigates risks associated with modern slavery across its operations. Additionally, the review of the International Education Agent Policy took place in November 2025, with minor amendments adopted to align with changes to the Education Services for Overseas Students Act 2000 (Cth).

Modern slavery risks are considered part of the University's Third-Party Risk Management (TPRM) Framework. Assurance on the effectiveness of governance and controls, in accordance with the TPRM framework, will be performed by the Risk and Compliance Unit.

Principal Governing Body Approval of this Statement

This Modern Slavery Statement was approved on 18/06/2026 by the Council of Charles Sturt University.



Professor Renée Leon PSM
Vice-Chancellor and President



1800 275 278 (free call within Australia)
+61 1800 275 278 (callers outside Australia)



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