Edith Cowan University





ECU Modern Slavery Statement 2022

ECU recognises the significance of Aboriginal and Torres Strait Islander peoples' communities, cultures, and histories. ECU acknowledges and respects its continuing association with the Whadjuk people and Wardandi people of the Noongar nation, who are the original custodians of the land upon which the University's campuses stand in Australia.

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This document is available online at the link below. It is available in alternate formats upon request.

https://www.ecu.edu.au/about-ecu/reports-and-plans/modern-slavery

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Introduction

The <u>Modern Slavery Act 2018</u> (Cth) requires large organisations in Australia to publish annual modern slavery statements to address the risks of slavery in their businesses and supply chains.

Edith Cowan University (ECU) is an Australian public university. It was established under the *Edith Cowan University Act 1984* (WA).

The University has three controlled entities: Edith Cowan Accommodation Holdings Pty Ltd, Australian Pathway Education Group Pty Ltd, and ECU Holdings Pty Ltd.

ECU's internal modern slavery working group develops strategies to address the requirements of the *Modern Slavery Act 2018*. The working group manages the University's modern slavery actions tracker, to monitor and oversee ECU's progress on initiatives to reduce the risk of modern slavery. The working group reports to the University's Senior Deputy Vice-Chancellor.

Within ECU's operations, the University has determined that the risk of modern slavery practices is very low.

ECU is a member of the Australian Universities Procurement Network (AUPN), which operates on behalf of 39 member universities to ensure a collaborative approach to procurement matters. In 2022, AUPN developed and piloted a modern slavery self-assessment questionnaire for suppliers, established a bank of legal clauses for procurement agreement templates, and established a full-time position responsible for its modern slavery program.

All ECU procurement staff have completed the Australian Border Force's *Modern Slavery in Public Procurement* training.

In 2022, ECU reviewed its recruitment and employment practices and procurement and supply chains. The reviews determined that ECU has a low risk of modern slavery during recruitment and employment due to its welldeveloped policies and procedures, and that it has adequate policies and systems in place in its procurement supply chains.

ECU's procurement audit in 2022 found that ECU has a demonstrated commitment to uplifting its environmental, social and governance practices. An audit of the University's compliance framework found ECU has a strong culture relating to international compliance.

ECU's Modern Slavery Statement 2022 has been prepared in accordance with the provisions of the *Modern Slavery Act 2018*, and was approved by the University's Council on 29 June 2023.

About modern slavery

Slavery is defined in Australian legislation as the condition of a person over whom the powers of ownership are exercised. Slavery-like offences include servitude, forced labour, deceptive recruiting for labour, forced marriage, and debt bonding. Slavery also includes trafficking in persons, and the worst forms of child labour such as commercial sexual exploitation or work likely to harm health or safety.

The Walk Free Foundation's <u>Global Slavery Index 2023</u> (GSI) assessed Australia as having a low prevalence of modern slavery (ranked 149 out of 160 countries assessed); however, the GSI estimated that 41,000 people in Australia are experiencing modern slavery. Walk Free reported that <u>49.6 million people lived in situations of modern slavery</u> in 2021, with 27.6 million in forced labour and 22 million in forced marriage — 10 million people more than the 2017 estimates. Walk Free stated that the risk of modern slavery has been increased by the COVID-19 pandemic, armed conflicts, and climate change, which have disrupted employment and education, exacerbated poverty and displacement, and increased reports of gender-based violence.

About ECU

Edith Cowan University (ECU) is one of Western Australia's oldest higher education institutions, and its youngest university. ECU has 28,700 undergraduate and postgraduate students, and approximately 1,900 staff. The University has three campuses in Western Australia, at Joondalup, Mount Lawley, and Bunbury.

ECU's eight schools – Arts and Humanities; Business and Law; Education; Engineering; Medical and Health Sciences; Nursing and Midwifery; Science; and the Western Australian Academy of Performing Arts (WAAPA) – deliver a range of on-campus and online courses and undertake research across a range of disciplines.

ECU was established by the <u>Edith Cowan</u> <u>University Act 1984</u> (WA). The University is a Table A provider in the <u>Higher Education Support</u> <u>Act 2003</u> (Cth), and is a registered training organisation (RTO) as per the <u>National Vocational</u> <u>Education and Training Regulator Act 2011</u> (Cth).

The University is recognised as a self-accrediting authority by the <u>Tertiary Education Quality and</u> <u>Standards Agency</u>, and as an RTO by the <u>Australian Skills Quality Authority</u>.

Purpose

ECU's purpose is to transform lives and enrich society.

Vision

To lead the sector in educational experience, research with impact, and in positive contributions to industry and communities.

Values

- Integrity We are ethical, honest, and fair and demonstrate trust and personal responsibility.
- Respect

We treat everyone within our diverse community with dignity and respect.

• Rational Inquiry

Our decision-making is driven by evidence, sound reasoning, and creative thinking.

• Personal Excellence We demonstrate the highest personal

and professional standards.

Courage

We are bold and resolute in our thinking and actions in pursuit of our goals.



Structure

Governance

ECU is governed by a University Council that controls and manages the operation, affairs, concerns, and property of the University, in accordance with ECU's Corporate Governance Statement and the *ECU Act 1984*.

The University Council and the senior management team, led by the Vice-Chancellor, work together to ensure that the University achieves its strategic goals.

ECU's Council establishes committees to assist in meeting its responsibilities, which report to Council or Academic Board as appropriate.

Controlled entities

Australian Pathway Education Group Pty Ltd

ABN 25 607 580 969 ACN 607 580 969 RTO Provider 41472

Unit 3, 15 Barron Parade Joondalup WA 6027, Australia

Suite 15, Level 40, 669 Xinzha Road Jing'An District, Shanghai People's Republic of China

Australian Pathway Education Group (APEG) was an Australian registered training organisation providing vocational education and training programs to high school students in China. APEG ceased operations in 2022.

ECU Holdings Pty Ltd

ACN 635 918 286

270 Joondalup Drive Joondalup WA 6027, Australia

ECU Holdings is an entity established to focus on generating revenue via commercial activities for re-investment in ECU's academic activities.

Edith Cowan Accommodation Holdings Pty Ltd

ABN 80 135 260 383 ACN 135 260 383

270 Joondalup Drive Joondalup WA 6027, Australia

Edith Cowan Accommodation Holdings provides residential and commercial accommodation and related ancillary activities to offer an affordable and supportive living environment for ECU students residing on campus in Australia.

Staff

ECU and its controlled entities employed the following numbers of staff in 2022:

Organisation	Staff
Edith Cowan University	1,864
Australian Pathway Education Group	1
ECU Holdings	0
Edith Cowan Accommodation Holdings	1

Note: Staff numbers for Edith Cowan University are provided in full-time equivalent (FTE); the controlled entities display headcount. ECU's FTE includes an estimate of casual staff.



Operations

Edith Cowan University provides higher education and vocational education and training across a broad range of disciplines, and conducts research and development under the themes of health; society and culture; natural and built environments; and securing digital futures.

ECU's services and products include:

- Teaching and educational services for students.
- Research and research support services, and collaborations with other organisations.
- Educational outreach in schools and communities.
- External products and services in areas such as training, consultancy, fitness, arts, entertainment, and health care.
- Facilities for hire and lease.
- Student accommodation.
- Academic scholarships and prizes through the charitable ECU Foundation.
- Professional services to support the University's operations.

ECU's global partnerships include dual degree programs, articulation of students to ECU, delivering ECU's academic programs overseas, student exchange and study tour programs, joint PhDs, and research collaborations. In addition, ECU has a significant presence in Sri Lanka, and the Australian Pathway Education Group delivered education services in China. Australian Pathway Education Group ceased operations during 2022.

Typically, ECU has long-term contractual relationships with major suppliers, underpinned by regular market testing and competitive tendering to ensure value. Due to the diversity of its operations, ECU also deals with numerous occasional or one-off transactional suppliers.

Controlled entities

As detailed on the previous page, ECU's controlled entities have been established to provide student accommodation (Edith Cowan Accommodation Holdings), deliver vocational education and training services (Australian Pathway Education Group), and generate revenue to fund academic activities (ECU Holdings).

Supply chains

ECU's suppliers provide goods and services that can be divided broadly into four categories:

- Professional services, such as insurance, staff training, and advertising.
- Property and facilities, including cleaning and facilities management services, and utilities.
- Research and teaching; for example, research supplies and equipment.
- Technology, such as hardware, software, and printing.

Spend by country

In 2022, nearly 93 per cent of ECU's spend was with suppliers located in Australia. Using the Walk Free Foundation's 2023 Global Slavery Index, the estimated prevalence of modern slavery (victims per 1,000 population), vulnerability score, and government response credit rating for each country is listed below.

ECU procured services from five of the top 20 countries with the highest prevalence of modern slavery, according to the Global Slavery Index 2023. This spend totalled 0.01 per cent of ECU's expenditure (\$16,488) and was related to student recruitment events (Pakistan, Saudi Arabia, and Türkiye), PhD journal publication (Türkiye), and student exam supervision (United Arab Emirates and Kuwait). These are low risk activities for modern slavery practices.

ECU Sri Lanka is managed by Navitas, which publishes an annual Modern Slavery and Human Trafficking Statement on the <u>Navitas website</u>, and via the Australian Government's <u>Modern Slavery</u> <u>Statements Register</u> under its parent company, Marron Group Holdings Pty Ltd.

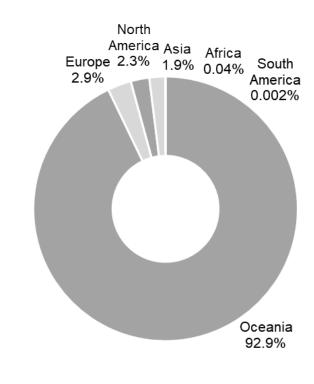
			Modern slavery estimated prevalence	Modern slavery vulnerability score	Modern slavery government response score
Country	ECU spend (%)	ECU spend (\$)	(# per 1,000 ppl)	(lower=better)	(higher=better)
Australia	92.79	137,764,219	1.6	6.8	66.7
United States	2.22	3,296,138	3.3	24.5	66.7
Singapore	1.50	2,222,372	2.1	24.4	47.4
United Kingdom	1.40	2,084,428	1.8	14.3	67.9
Germany	0.78	1,165,487	0.6	10.7	61.5
Netherlands	0.53	787,718	0.6	6.0	66.7
India	0.12	173,538	8.0	56.0	46.2
Bhutan	0.07	100,340	n/a	n/a	n/a
Israel	0.06	84,656	3.8	35.4	44.9
Canada	0.05	76,675	1.8	10.7	60.3

Note: Figures in the 'Estimated prevalence', 'Vulnerability', and 'Government response' columns are from the Walk Free Foundation's Global Slavery Index (GSI) 2023. The prevalence of modern slavery, as the number of victims per 1,000 population, includes estimates of forced labour and forced marriage drawn from nationally representative surveys, the International Organization for Migration's counter-trafficking dataset, and secondary sources for assessing state-imposed labour (prisons, labour camps, and military facilities). The GSI's vulnerability model mapped risks across governance, access to basic needs, inequality, disenfranchised groups, and the effects of conflict, resulting in a total score out of 100. Government response assessed the support provided for victims, the criminal justice outcomes, government coordination and accountability, risk factors such as attitudes and social systems, and whether government and business stop sourcing goods and services produced by forced labour, to obtain a final score. Data and methodology available from <u>walkfree.org</u>.

In May 2022, early siteworks commenced for ECU's state-of-the-art <u>City Campus</u> in the Perth Central Business District, followed by excavation works in November. The final main works phase commenced in January 2023, with the campus expected to welcome its first students in 2026. ECU's proportion of expenditure on building and construction contractors and consultants therefore increased in 2022. Multiplex Construction is the head contractor for this significant project. Multiplex publishes <u>annual</u> <u>modern slavery statements</u> in compliance with both the Australian *Modern Slavery Act 2018* and the United Kingdom's *Modern Slavery Act 2015*.



Spend by region



Spend by category

(\$m) 100	Category (top 10) Spend	d (\$m)
75	Building construction and renovation contractors	27.9
	Facilities and services consultants	12.8
50	Integrated management services	9.8
	Student placements	9.4
25	Support software	9.4
	Public administration	8.2
	Books, journals, publications	5.5
	Management consulting services	4.6
	Teaching and research software	4.3
0	Electricity	3.9

Controlled entities

Edith Cowan Accommodation Holdings has only one supplier, Campus Living Villages, which provides all goods and services.

Australian Pathway Education Group

(APEG) ceased operations during the reporting period. Prior to the closure process, APEG had

a limited number of suppliers that provided services including training, printing, and delivery, and products like computer hardware and software, cloud-based systems, books, and office supplies.

ECU Holdings follows ECU's procurement policies and uses ECU's corporate services. Its suppliers are a subgroup of the University's.

Assessing the risks

All organisations are subject to risks of modern slavery within their supply chains and operations.

Organisations can directly cause modern slavery by using exploitative labour practices, such as forced labour (people working against their will under threat of punishment), debt bondage (people forced to work to pay off debt without control of employment conditions or debt), or human trafficking (using violence or coercion to transport people for forced labour). Within ECU's operations, the University has determined that the risk of modern slavery practices is very low. The University's activities are governed by its risk management framework, key policies, and compliance with Australian legislation.

An organisation may contribute to modern slavery practices if its actions facilitate or incentivise modern slavery, for example through unrealistic pricing, or delivery expectations placed on suppliers. ECU's procurement and human resources policies and processes, and internal governance structures, work together to mitigate these risks.

Organisations can be linked to modern slavery practices through the activities of a partner organisation, including organisations where there is no direct contractual relationship, such as the partner of a partner organisation. The complexity of supply chains can make these issues difficult to identify. ECU had planned to complete its audit of Tier 2 suppliers (i.e., the suppliers of ECU's direct suppliers) by the end of 2022; however, at this stage, the work is not yet completed due to external delays with the assessment tool. The property and facilities sector, with its high level of building and cleaning subcontracting, is an area at higher likelihood of modern slavery, however, the risk to ECU is believed to be low. ECU primarily procures from large multinational corporations that are required to comply with Australian law, including the Modern Slavery Act 2018 (Cth). There are inherent risks faced by all organisations with Tier 2 suppliers and beyond in the technology sector regarding the origins of

materials and device production. ECU obtains most of its technology from large corporations.

ECU is a member of the <u>Australian Universities</u> <u>Procurement Network</u> (AUPN). The AUPN is supported by HES Pty Ltd, a not-for-profit organisation owned by Universities Australia. The AUPN established a Modern Slavery Working Group that provides resources for universities, including a modern slavery risk dashboard. By working collaboratively with 38 other Australian universities, ECU minimises duplication for universities and suppliers and reduces the costs of risk assessments and remediation.

The AUPN has obtained the <u>FRDM</u> platform for its members. FRDM analyses supply chains to identify potential risks, complemented by mitigation and progress tracking tools. All participating universities contribute data into a spend cube, which increases visibility of modern slavery risks and enables coordinated actions. FRDM is currently monitoring 1,987 suppliers used by ECU. AUPN continued to work on improving data collection in 2022.

ECU has an online reporting process that enables staff, students, and the public to notify the University of suspected modern slavery practices within its supply chain or operations. The University received zero reports in 2022.

The University also undertakes research into modern slavery practices. In 2022, this included a project on the key legal drivers in modern slavery in the global value chain over the past 20 years, and a systemic review of the cocoa industry in Ghana and Brazil. Associate Professor Joshua Aston, Dr Mostafa Naser, and Dr Jamal Barnes received a grant to carry out research on the legal and policy challenges and responses to irregular migration and modern slavery in Australia. In addition, relevant publications included:

 Aston, J., Wen, J., Goh, E., & Maurer, O. (2022). Promoting awareness of sex trafficking in tourism and hospitality. International Journal of Culture, Tourism and Hospitality Research, 16(1), 1-6. https://doi.org/10.1108/IJCTHR-01-2020-0032

 Aston, J., Wen, J., & Yang, S. (2022). Tourists' perceptions of and reactions to child sex tourism: An exploratory qualitative investigation. Asia Pacific Journal of Marketing and Logistics, 2022(1), 25. <u>https://doi.org/10.1108/APJML-08-</u> 2021-0589

Controlled entities

Campus Living Villages Pty Ltd (Campus Living Villages), the sole supplier for **Edith Cowan Accommodation Holdings**, assesses and mitigates its modern slavery risks as outlined in the next section of this report.

Australian Pathway Education Group (APEG)

ceased operating during the reporting period. Previously, APEG had assessed the modern slavery risk for its Australian operations to be low. APEG's operations in China held a higher risk of modern slavery due to local work practices. These risks were mitigated using active account management and the provision of significant incountry support to ensure its team had visibility over the applicable supply chains. Overall, the risk was deemed to be relatively low due to the nature, and limited number, of suppliers.

ECU Holdings acts as a holding trust for University investments and does not have any employees. Currently, its risks are a subset of those managed by the University.





Addressing the risks

The University's 'three lines of defence' model of risk assurance involves the following:

- *First line of defence*: Systems and processes, culture, and controls present at the operations level. With the specific risks of modern slavery practices in ECU's supply chains and operations, this primarily involves the procurement function.
- Second line of defence: ECU's risk management and compliance functions, which include assessing the effectiveness of controls through regular risk reviews, self-assessment reviews, and a formal compliance review program.
- *Third line of defence*: Internal audit, which provides further oversight of controls, including independent assurance that the framework is functioning correctly.

ECU's internal modern slavery working group develops strategies to address the requirements of the *Modern Slavery Act 2018*. The working group includes representatives from procurement, human resources, compliance, planning, and risk management services. Representatives from ECU's controlled entities are also invited to attend and participate in meetings of the working group. The working group reports to the University's Senior Deputy Vice-Chancellor.

First line of defence: procurement and education

Through ECU's membership of the Australian Universities Procurement Network (AUPN), the University accesses a platform that assists with sourcing goods and services, and a tool that identifies and rates modern slavery supplier risks. In 2022, AUPN's actions included:

- Established an Academic Advisory Board to ensure academic staff at universities are aware of the actions being taken and provide input into the direction of AUPN's Modern Slavery Working Group.
- Developed a modern slavery selfassessment questionnaire for suppliers.
- Ran a pilot to receive feedback on the process of responding to the questionnaire, with feedback from 21 suppliers to date.

- Established a bank of legal clauses that can be used in universities' procurement agreement templates.
- Used funding, contributed by all member universities, to establish a full-time position responsible for the modern slavery program. This is expected to increase AUPN's activities and outcomes in future years, and to further drive common initiatives.

ECU is in the process of changing providers for its internal online training; as such, the University-wide integrity training module has not yet been rolled out. All ECU procurement staff have completed the Australian Border Force's online training course, <u>Modern Slavery in Public</u> <u>Procurement</u>.

The University will continue to assess further educational options for staff and students regarding modern slavery practices. For students, ECU currently covers modern slavery practices in LAW3855 Human Rights Law, which includes a module covering definitions, badges of modern slavery (humiliation, ownership, exploitation of vulnerable people, lack of consent, employment terms and conditions, limits on the power to end the employment relationship, and denial of rights outside the work relationship), modern slavery types, and the international frameworks, and Australia's approach, to address modern slavery. HST1152 Introduction to Occupational Health covers historical slavery and child labour to provide context to the importance of safe working conditions, and HST1160 Occupational and Environmental Health Regulation (undergraduate unit) and OHS6130 Workplace Health and Safety Law (postgraduate unit) cover the impact of the Industrial Revolution, particularly on children, the history of work health and safety in the United States, modern child slavery, and the activities of the International Labour Organization. Modern slavery is mentioned in several project management units at both undergraduate and postgraduate level in the context of ethical business practices and sustainability. Modern slavery is also covered under sustainable practices in ECU's postgraduate supply chain and logistics management courses. From 2023, modern slavery will be included in ECU's criminology unit CRI3109 International Human Rights.

Second line of defence: risk management and compliance

During 2022, ECU undertook the following reviews relating to modern slavery related risks:

- Recruitment and employment practices, which focused on honesty in recruitment, employment of international people and refugees, employment of children and youth, and remuneration and leave entitlements. The review determined that the University had a low risk of modern slavery practices occurring during recruitment and employment due to its well-developed policies and procedures.
- Procurement and supply chains, which focused on practices regarding transparency and due diligence throughout the supply chains to deter and identify any instances of modern slavery or slavery-like conditions. The review determined that ECU had adequate policies and systems in place. An outcome of the review was to further strengthen the processes in response to the University's maturing approach to modern slavery.

Third line of defence: internal audit

ECU's procurement audit in 2022 included the stages of the procurement cycle including sourcing, evaluation and award, and considerations of the key risks and controls in place including contemporary considerations and compliance requirements with regards to modern slavery, international compliance matters, work health and safety, and sustainability. Audit outcomes were reported to the Quality, Audit and Risk Committee as part of ECU's internal audit reporting. The audit found that ECU has a demonstrated commitment to uplifting its environmental, social and governance (ESG) practices through the following:

- Subscription to the FRDM service to assist with mapping, monitoring and mitigating ESG risks in ECU's supply chain, including relevant alerts.
- Documented social and sustainable procurement guidelines.
- Bi-monthly meetings between ECU's procurement and digital and physical environment teams to strengthen sustainable practices.

ECU's compliance framework audit considered the adequacy of ECU's international compliance management framework to identify and manage risks associated with international agreements and operations. Overall, it was found that ECU has a strong culture relating to international compliance. Recommendations for improvements have been registered in the ECU Recommendations Tracking System to ensure the associated actions are implemented.

Policies and processes

The following policies relate to managing the risks of modern slavery practices, in accordance with ECU's values of integrity, respect, rational inquiry, personal excellence, and courage.

- Staff Code of Conduct, which provides a framework for appropriate behaviour for staff.
- *Complaints*, which defines the principles that govern the approach taken by ECU in handling complaints made by students or members of the public.
- Fraud and Misconduct Prevention and Management that sets out the principles, strategies, and controls for preventing, detecting, and managing misconduct, fraud, and corruption.

The processes below are designed to complement the University's policies and operations.

- Public Interest and Whistleblower Protection Disclosure Guidelines to assist staff who report corrupt or improper conduct.
- Social and Sustainable Procurement Guidelines to incorporate sustainability and social responsibility into purchasing decisions, including risks of modern slavery.
- Fraud and Misconduct Prevention and Management Guidelines, which support early detection and appropriate responses to acts of fraud, corruption, and misconduct.

The University's supplier contracts contain clauses related to modern slavery practices. These clauses are included in all legal templates.

Legislation and guidelines

Edith Cowan University is subject to legislative obligations, including the following:

- Modern Slavery Act 2018 (Cth)
- <u>Corporations Act 2001</u> (Cth)
- <u>Corruption, Crime and Misconduct</u> <u>Act 2003</u> (WA)
- Fair Work Act 2009 (Cth)
- Public Interest Disclosure Act 2003 (WA)
- Work Health and Safety Act 2011 (Cth)
- <u>Work Health and Safety Act 2020</u> (WA)

In addition, ECU supports the following international conventions and guidelines:

- <u>United Nations (UN) Universal</u>
 <u>Declaration of Human Rights</u>
- <u>UN Guiding Principles on Business</u> <u>and Human Rights</u>
- <u>UN Sustainable Development Goals</u>
- International Labour Organization (ILO)
 Declaration on Fundamental Principles
 and Rights at Work
- <u>Ten Principles of the UN Global Compact</u>

Controlled entities

The University continues to monitor its controlled entities' progress towards assessing and mitigating modern slavery risks. Controlled entities are required to complete ECU's modern slavery self-assessment questionnaire annually, which assists them to identify and manage their modern slavery risks. The process also provides ECU with the opportunity to review the outcomes and work with the entities to address risks.

The sole supplier of **Edith Cowan** Accommodation Holdings, Campus Living Villages (CLV), voluntarily publishes a modern slavery statement, in accordance with its values. CLV also participates annually in the Global Real Estate Sustainability Benchmark (GRESB) <u>Real</u> <u>Estate Assessment</u>. GRESB assesses and benchmarks environmental, social and governance performance of real estate assets. In 2022, CLV's GRESB score increased by 10 points to 82 out of 100 and a four-star rating. This is in the top quartile globally. A major component of the governance section involved CLV's approach to modern slavery and associated policies and processes. CLV's GRESB submission covered its operations across Australia (including ECU Villages), New Zealand, the United Kingdom, and the United States.

Australian Pathway Education Group (APEG) ended its operations during the reporting period, and as such, did not undertake any actions related to modern slavery risks in 2022.

ECU Holdings follows the University's established risk management strategies.



Consultation and approvals

We hereby submit the Modern Slavery Statement of Edith Cowan University for the year ending 31 December 2022, for publication on the Australian Government's <u>Online Register for Modern Slavery</u> <u>Statements</u>.

The Statement was completed in consultation with relevant representatives from ECU's three controlled entities: Edith Cowan Accommodation Holdings, ECU Holdings, and Australian Pathway Education Group. In addition, the University also consulted with the sole supplier for Edith Cowan Accommodation Holdings, Campus Living Villages.

The entities were represented by senior staff members, including the Regional General Manager for Campus Living Villages, and the Manager, Commercial and Investment Services (ECU) for ECU Holdings and Australian Pathway Education Group. The representatives for controlled entities were invited to participate in ECU's modern slavery working group meetings, and were requested (along with Campus Living Villages) to complete a self-assessment questionnaire to identify modern slavery risks, foster collaboration between ECU and its controlled entities to address these risks, improve transparency, and identify areas for further due diligence.

The information gathered from the consultation process was used to inform ECU's Modern Slavery Statement 2022, and will be used to assist controlled entities to develop relevant modern slavery policies and procedures, as may be required.

ECU's Modern Slavery Statement 2022 is made in accordance with the *Modern Slavery Act 2018.* It is provided pursuant to a resolution of the University's Council on 29 June 2023, following endorsement by University Executive on 24 May 2023 and the Quality, Audit and Risk Committee on 29 May 2023.

J. lieldsmostly

Denise Goldsworthy AO Chancellor 29 June 2023

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Professor Steve Chapman CBE Vice-Chancellor 29 June 2023