



WEHI
brighter together

2024 Modern Slavery Statement



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WEHI's 2024 Modern Slavery Statement

WEHI (Walter and Eliza Hall Institute of Medical Research) is committed to respecting human rights, including the right to be free from slavery, exploitation, forced labour, domestic servitude and illegal forms of child labour.

Our modern slavery commitments enhance our broader ethical and sourcing commitments in relation to global and local supply chains, Indigenous businesses, sustainable supply and building broader ESG awareness.

This Modern Slavery Statement (**Statement**) has been prepared in accordance with the Modern Slavery Act 2018 (**Act**). It sets out the steps we have taken to assess and address modern slavery in our operations and supply chain during the 2024 reporting period and is our fifth statement since the scheme was enacted.

Since the date of the last Statement, there have been no major changes in the way that WEHI operates or the types of goods and services we procure through our supply chain.

In 2024, WEHI continued to develop its modern slavery program as part of an ongoing, wider ethical sourcing programme and an initiative around foreign compliance risks. A Foreign Engagement Policy was developed to coordinate and centralise WEHI's oversight of key foreign risks, including modern slavery.

About WEHI

WEHI is one of Australia's leading biomedical research organisations. It has a strong national and international reputation for conducting highly influential basic and translational research.

WEHI's research focuses on improving the understanding, treatment and prevention of important health challenges, focusing on cancer, immune and infectious diseases, developmental disorders and age-related conditions.

WEHI is an Australian not-for-profit public company limited by guarantee and a registered charity with the Australian Charities and Not-for-Profits Commission (**ACNC**) (ABN 12 004 251 423). Our charitable purpose is 'advancing health'.

WEHI is governed by a board of directors appointed under the WEHI constitution. Operational management is delegated to the Director of WEHI. In 2024, WEHI employed approximately 900 staff.

Our modern slavery risks

1. Our approach

We have taken a risk-based approach to determining whether we are likely to cause, contribute to or be directly linked to modern slavery in our operations and supply chains. Our modern slavery risk matrix is set out in the Annexure as Table 1.

2. Operations

We operate within the health and medical research sector in Melbourne, Australia. Our operations primarily involve the following:

- Health and medical research
- Education
- Provision of medical research products and services
- Commercialisation.

Our main facility is in the Parkville Biomedical Precinct, a vibrant and collaborative life science research, education and healthcare hub. We also have offices in central Melbourne and research facilities in Bundoora and Kew.

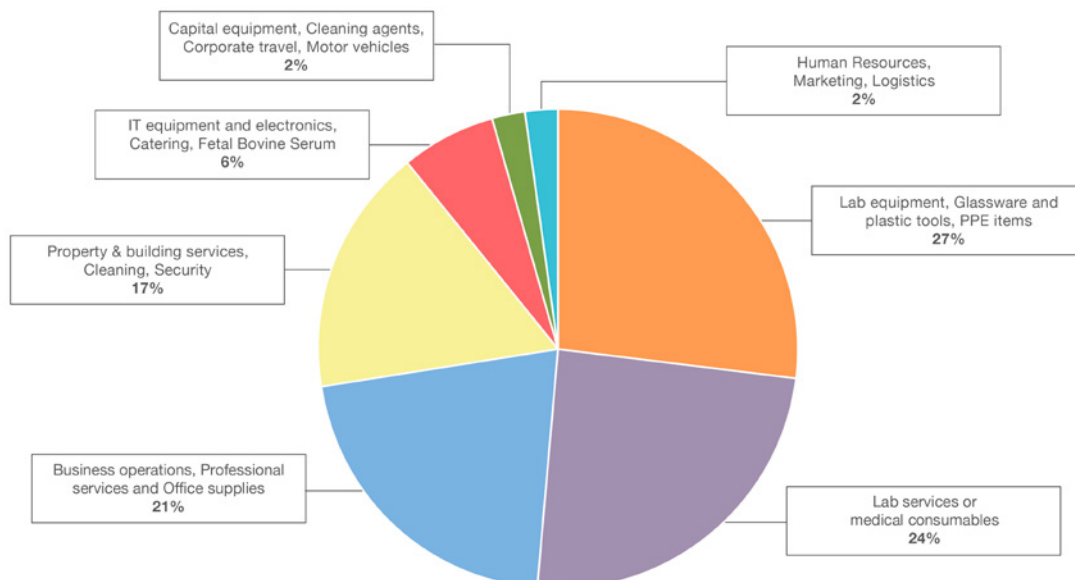
Table 2 in the Annexure sets out the risk level for each WEHI operational category. Overall, our operational activities continue to pose a low risk for modern slavery:

- Our staff, students and domestic collaborators must meet Australian legal requirements including the ACNC External Conduct Standards.
- WEHI researchers, whether operating in Australia or overseas, must meet Australian ethical obligations, including those established by the National Health and Medical Research Council including the National Statement on Ethical Conduct in Human Research (**National Statement**),
- WEHI's human research projects are subject to internal governance reviews that include a risk assessment that considers compliance risks.
- WEHI's collaborations are formalised contractually (with embedded compliance obligations).
- Where overseas collaborations occur in countries with high vulnerability scores for modern slavery, in addition to contractual requirements and reporting, these risks are mitigated by due diligence and Foreign Risk Reviews mandated under WEHI's new Foreign Engagement Policy.

3. Supply chain

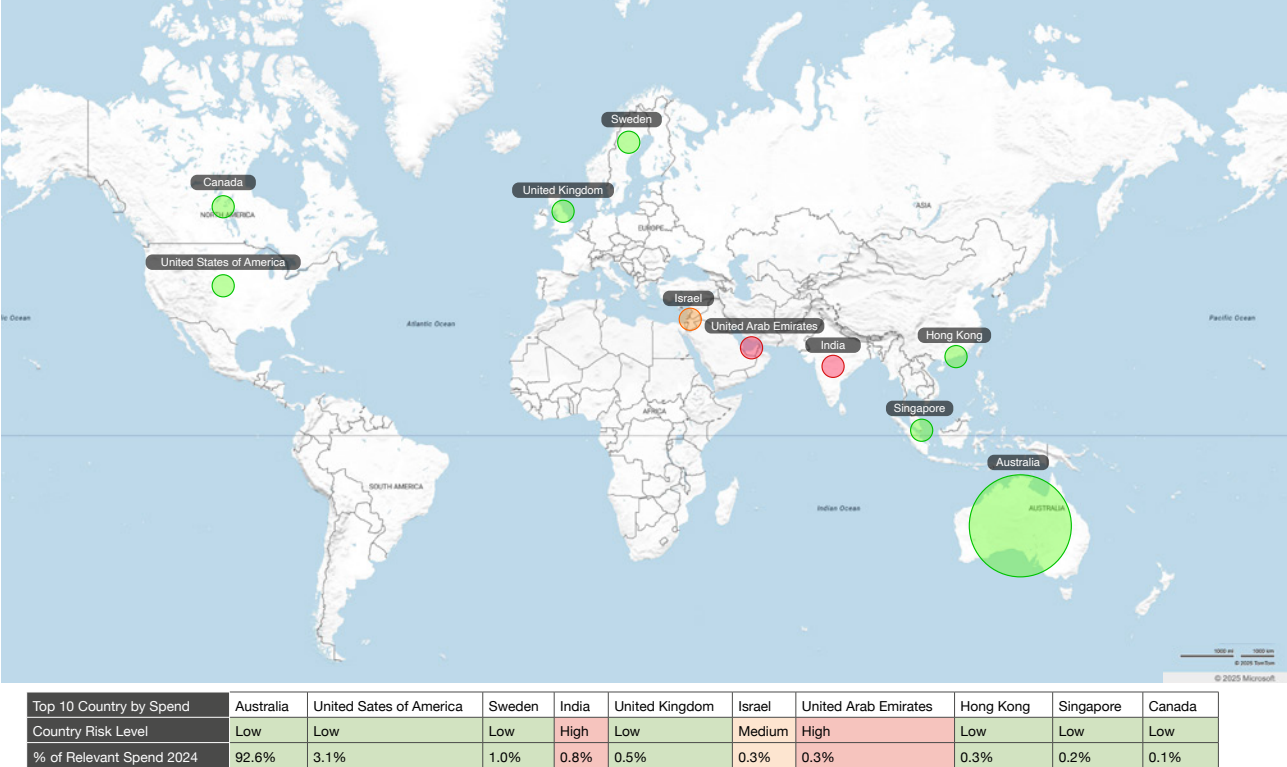
Supply categories

WEHI procures a range of products and services to support our activities. Our 2024 spend by category is summarised below. Currently, our highest risk category is IT Equipment and Electronics.



Geographic location

WEHI draws from domestic and international supply chains to ensure provision of ethically sourced, high-quality components and supplies. Our 2024 spend by location is summarised below. Products and services sourced from India and United Arab Emirates pose the highest risks for WEHI in terms of geographic location.



Modern Slavery initiatives

4. Risk assessments

In preparing this Statement, the team has reviewed key risk areas and have not identified any new risks.

5. Supplier due diligence

New suppliers continue to be screened using our modern slavery risk matrix. Our Procurement Policy and ERP system includes modern slavery due diligence processes for selecting, onboarding and managing suppliers.

Answering our modern slavery questionnaire is a mandatory step in the supplier onboarding process. As set out in previous statements, most of our suppliers are not directly subject to the Act or its equivalent (in Australia or otherwise).

6. Supplier monitoring

WEHI continues to work with key suppliers to ensure alignment exists around organisational values, including the elimination of modern slavery.

Under WEHI's Supplier Code of Conduct, suppliers must ensure there is no modern slavery in their supply chains and operations and comply with modern slavery laws, rules and regulations. Suppliers must let us know if any modern slavery issues arise and take steps to address those issues.

In 2024, we identified 849 active suppliers relevant to our monitoring criteria.

7. Media monitoring

In 2024, WEHI's media monitoring service identified 2120 modern slavery alerts across all media globally. A select list of these is generated and sent to Procurement, who assess them. Of these, none have been identified as actionable risks at this stage.

8. Template agreements

WEHI's template agreements include compliance clauses as standard, with specific modern slavery clauses in agreements for the acquisition of goods and services.

9. Sector engagement and tools

The Procurement and Governance, Risk and Compliance teams continue to engage with sector-led initiatives to support best practice in modern slavery compliance, such as through professional bodies, including Procurement and Supply Australia (PASA), Procurement Australasia (PA) and HealthShare Victoria (HSV).

10. Governance

WEHI's Modern Slavery Working Group is led by the Procurement and Governance, Risk and Compliance teams and reports to the Professional Services Leadership Team, Audit, Risk and Compliance Committee and the WEHI Board. The Working Group meets monthly to support modern slavery initiatives and the development of this Statement.

11. Risk and Compliance

In 2024, WEHI developed a Foreign Engagement Policy to support cross-functional foreign risk management across multiple compliance areas. The Foreign Engagement Policy will coordinate and centralise WEHI's oversight of research and operational activities that include foreign nationals and organisations.

WEHI has had a Modern Slavery Policy since 2022. It is publicly available on our website.

Modern Slavery risks are captured and monitored through our risk and compliance system.

12. Training

WEHI personnel with purchasing responsibilities, or who are responsible for high-risk research activities overseas, are provided with training on modern slavery risks, including the Supplier Code of Conduct and preferred contractual terms, where appropriate.

Assessing the effectiveness of our actions

13. Annual review

WEHI is committed to applying a continuous improvement approach to modern slavery. The steps described in this Statement represent an ongoing process. The Modern Slavery Working Group completed an annual review of our modern slavery activities in preparation for drafting this Statement and to set the priorities for the next reporting period.

14. Remediation

In 2024, WEHI was not aware of any instances of modern slavery in its supply chain or operations. On this basis, no remediation steps were required. WEHI is a member of several industry procurement networks and, as far as we are aware, no instances of modern slavery have been disclosed to WEHI in respect of our common suppliers.

Looking forward – to 2025 and beyond

15. ESG criteria

WEHI's Procurement team continues to be involved in various aspects of environmental, social and governance (ESG) compliance. WEHI wishes to engage with suppliers who share similar values and with like-minded organisations who can support us in acting on these values.

WEHI looks at Modern Slavery as part of the broader ESG program which also addresses supplier sustainability and Reconciliation Action Plan initiatives.

16. Supplier certification

As set out in section 4, the supplier due diligence process is time-consuming, and we continue to seek out products that would streamline and simplify these risk assessments.

In 2024, WEHI joined with five other medical research institutes (MRIs) to create a modern slavery compliance consortium. In 2025, the consortium will work on sharing data relating to modern slavery utilising a common platform.

17. Operational risk review

As part of continuous improvement to our Risk Management Framework, WEHI will be considering the operational risk register in 2025. We intend to review the current operational context for the purposes of modern slavery risk assessments during this process.

Consultation with controlled entities

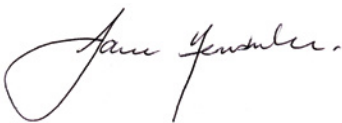
In 2024, WEHI controlled five entities: WEHI Ventures Pty Ltd (ACN 668 196 932) as trustee of the 66Ten Unit Trust, Nelcanen Therapeutics Pty Ltd (ACN 659 824 147), Proxima Bio Pty Ltd ACN 666 622 957, Research Code Pty Ltd (ABN 66 667 575 813) Ternarx Pty Ltd (ABN 82 667 537 254).

Operational activities are predominantly managed through WEHI via contractual arrangements or otherwise. To the extent that these entities procure goods or services, WEHI's existing processes are utilised as described above.

WEHI consulted these entities in the development of this Statement.

Statement approval

This Statement was reviewed and approved by the Board of Directors of WEHI on 15 May 2025.



Jane Hemstrich, Chair

Annexure – Risk assessment tables

Table 1: Product and service risk matrix

Risk Matrix

			Domestic Region	Overseas Regions <small>Note, numbers in brackets are 'vulnerability of modern slavery risks' per the Global Slavery Index 2018</small>				
			0 Australia (4.3/100)	1 Europe & Central Asia (28/100)	2 Americas (41/100)	3 Asia & The Pacific (46/100)	4 Arab States (57/100)	5 Africa (62/100)
Supply Categories	Minerals IT electronics (computing equipment, software SaaS), Catering (fish, rice, cocoa), Fetal Bovine Serum	5 Extremely high risk	M (7)	M (11)	H (16)	H (20)	E (23)	E (25)
	Laboratory equipment (surgical equipments, freezers, microscopes, garments (textiles), Glassware and plastic tools (pipettes, dishes)	4 High risk	L (5)	M (7)	M (12)	H (17)	H (21)	E (24)
	PPE items (gloves, masks)							
	Utilities and related property services Laboratory services, Laboratory consumables Human Resources (P&C, Recruitment), Marketing and Communications, Logistics Building, Repairs and maintenance services	3 Medium Risk	L (3)	L (4)	M (6)	M (13)	H (18)	H (22)
	Capital equipment, Cleaning agents Corporate travel, Motor vehicles	2 Low Risk	L (2)	L (2)	L (5)	M (9)	M (14)	H (19)
	Business/Admin, Office Supplies Consultants, Legal, Professional fees	1 Extremely low risk	L (1)	L (1)	L (3)	L (6)	M (10)	M (15)

Risk Rating Key

L = Low	M = Medium	H = High	E = Extreme
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Note: The numbers in brackets (1-25) allow for further prioritisation of risks within each Rating category, e.g. E(25) has a higher priority than E(23)

Table 2: Risk level by operational area

Operational area	Description	Risk level domestic	Risk level overseas
Research (excluding human research)	Basic and translational research, on-site in Parkville, Melbourne. Research collaborations with academics, research institutes and commercial organisations.	Low	Low
Human research	Human clinical studies with academic institutions and hospitals.	Low	Low
Education	Supervision and experience for tertiary students through the Department of Medical Biology at the University of Melbourne. Work experience programs for domestic and overseas secondary students. Training opportunities for WEHI personnel.	Low	N/A
Supply of products and services	Supply of specialty mice. Supply of speciality research services (such as sample analysis, cell and tissue sorting and bioinformation analysis). Access to advanced technologies.	Low	Low
Commercialisation	Arrangements with pharmaceutical companies and research institutions to commercialise WEHI discoveries. Routine drug discovery tasks sometimes outsourced to overseas contractors, typically in China or India.	Low	Low

Table 3: Risk level by supply category

Risk level	Supply category
Extremely high risk	Nil
High risk	IT equipment and electronics
Medium risk	Laboratory equipment, glassware and plastic tools, personal protective equipment (PPE) items, laboratory services, medical consumables, foetal bovine serum
	Property and building services, cleaning, security, catering
	Human resources, communications and marketing, logistics
Low risk	Capital equipment, cleaning agents, corporate travel, motor vehicles
Extremely low risk	Business operations, professional services and office supplies

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