UNILINK EDUCATION

UNILINK ESG Action Plan 2026–2028

APPROVED AND EFFECTIVE

Field	Detail
Version	1.0
Approval date	1 August 2026
Status	Approved and effective; actions remain planned until evidenced
Plan period	1 August 2026 to 30 September 2028
Owner	Baining Wu, ESG Owner
Review	Quarterly internal review; annual management review
Public location	https://unilink.co/esg/#action-plan

> Approved by Baining Wu, Director. Effective 1 August 2026. Planned actions are not represented as completed without their stated evidence.

1. How this plan will be used

This is a two-year implementation plan for the Responsible Business & ESG Policy and Modern Slavery & Human Rights Statement. It also serves as UNILINK's:

- modern-slavery action plan;
- supply-chain risk mitigation plan; and
- emissions-reduction management plan.

It is a management plan, not a record of results. An action is complete only when the stated evidence exists and has been reviewed. If a deadline or data source proves unrealistic, the owner must record the reason, revise the action openly and preserve the original status history.

2. Governance and implementation actions

ID	Action	Owner	Target	Completion evidence	Status
G01	Approve and issue the ESG policy suite with an effective date and review date	Director	Before public release	Approval record and version history	Complete - approved 1 August 2026
G02	Appoint the ESG Owner, AI Accountable Owner and Australia/China Operations Leads in writing	Director	Within 30 days after approval	Role assignment record	Complete - Baining Wu: ESG Owner, AI Accountable Owner and China Operations Lead; Mavis Xiaomao Wang: Australia Operations Lead
G03	Establish one ESG risk register and one evidence register covering E, S and G actions	ESG Owner	Within 60 days after approval	Registers created and first review recorded	Planned
G04	Introduce annual declarations for material conflicts of interest and a register for relevant gifts, benefits and policy exceptions	ESG Owner	Within 90 days after approval	Declaration and register records	Planned
G05	Formalise the confidential concern process, restricted case register and corrective-action workflow; brief all staff	ESG Owner	Within 30 days after approval	Procedure, staff acknowledgement and case-register access test	Complete - August 2026: confidential concern channel to the Director (ben@unilink.co) in operation, restricted case register and corrective-action workflow held by the ESG Owner, all staff briefed

ID	Action	Owner	Target	Completion evidence	Status
G06	Establish an AI-use register and proportionate risk assessment for material AI systems, including purpose, owner, personal-information use, human oversight, limitations and review date	AI Accountable Owner	Within 90 days after approval	Register and completed first assessments	Planned
G07	Review the public privacy notice and student-facing notices against actual AI, facial-verification and online-notarisation uses	AI Accountable Owner	Within 120 days after approval	Approved gap review and remediation record	Planned

3. Social, human-rights and supply-chain actions

ID	Action	Owner	Target	Completion evidence	Status
S01	Deliver introductory ESG, human-rights, modern-slavery, grievance and responsible-AI training to relevant staff	ESG Owner	Within 90 days after approval; annually thereafter	Attendance, content and acknowledgement records	Planned
S02	Complete the first modern-slavery and human-rights risk map for operations and material supply categories	ESG Owner	31 December 2026	Risk map with indicators, controls and priorities	Planned
S03	Implement a risk-tiered supplier intake checklist and relevant contract clauses for new material or higher-risk suppliers	Procurement Owner	Within 90 days after approval	Checklist, clauses and sample completed review	Planned
S04	Review priority existing suppliers in electronics/IT, labour-intensive services, promotional goods and contractors with student-data access	Procurement Owner	30 June 2027	Review register, findings and actions	Planned
S05	Confirm that every material outsourced service identifies subcontracting, delivery location and a responsible contact	Procurement Owner	30 June 2027	Supplier records and exceptions log	Planned
S06	Test the concern channel and confirm staff know the internal channel and relevant external reporting options	ESG Owner	Within 60 days after approval; annually thereafter	Test record and staff knowledge check	Planned
S07	Review student-service accessibility, identity-check fallbacks and human-review routes for significant or disputed outcomes	Operations Owner	31 March 2027	Completed control review and action log	Planned

Supplier due-diligence decision path

1. **Classify the service or purchase.** Record value, location, workforce type, data access, subcontracting and product/material risk.
2. **Apply the appropriate review.** Routine low-risk purchasing receives basic business checks; material or higher-risk engagements receive enhanced questions and evidence.
3. **Decide and record.** Approve, approve with conditions, escalate, pause or reject. State the reason and owner.

4. **Contract and monitor.** Use relevant clauses, set an information or remediation date and review material changes.
5. **Respond to concerns.** Protect affected people, investigate proportionately, use leverage and verify corrective action. Suspend or terminate when serious risk cannot be credibly managed.

4. Environmental and emissions-management actions

ID	Action	Owner	Target	Completion evidence	Status
E01	Define the organisational and operational GHG boundary, base period, source hierarchy, estimation rules and material Scope 3 screening method	ESG Owner	31 December 2026	Approved baseline methodology	Planned
E02	Record all office energy bills directly controlled by UNILINK and request available landlord/building data where energy is bundled into rent	Office Operations Leads	Monthly after approval	Data log, bills and landlord requests	Planned
E03	Record work-related flights booked after the policy effective date, including origin, destination, class and trip purpose	Office Operations Leads	From effective date	Travel register and booking evidence	Planned
E04	Record company-owned IT equipment purchased and retired after the effective date; document reuse, repair, transfer or disposal	Office Operations Leads	From effective date	Asset and e-waste register	Planned
E05	Identify material cloud and AI service providers and record available supplier emissions or energy information, together with data gaps	AI Accountable Owner	31 March 2027	Provider inventory and source links	Planned
E06	Implement practical controls for avoidable printing, equipment power management, purchasing and waste	Office Operations Leads	Within 90 days after approval	Local checklist and spot-check record	Planned
E07	Prepare UNILINK's first operational GHG baseline for FY2026/27, covering Scope 1 and Scope 2 and screening material Scope 3 sources	ESG Owner	30 September 2027	Calculation workbook, methodology, limitations and management review	Planned
E08	Decide whether data quality supports a quantitative emissions-reduction target. If yes, document the boundary, baseline and pathway; if no, publish the gaps and next data-improvement step	Director and ESG Owner	31 December 2027	Signed target decision or documented deferral	Planned
E09	Review the baseline annually using current factors and explain material recalculations or boundary changes	ESG Owner	30 September each year after baseline	Updated workbook and change log	Planned

Planned first-baseline boundary

The first baseline will be proportionate to UNILINK's service-business profile:

- **Scope 1:** direct fuel or refrigerant emissions only where UNILINK owns or controls the relevant source; otherwise record "none identified" with the basis for that conclusion.

- **Scope 2:** purchased electricity consumed in offices where data is available or can be reasonably estimated.
- **Material Scope 3 screening:** business travel, employee commuting where usable data can be obtained, purchased cloud and AI services, IT equipment, material office procurement and waste.

Australian estimates should use current Australian Government National Greenhouse Accounts factors where applicable. Other locations should use current, authoritative and geographically appropriate factors. Supplier-specific information should be preferred when its boundary and method are sufficiently clear.

The baseline will disclose exclusions, estimates, data gaps and whether any part has been independently assured. UNILINK will not describe the baseline as a product footprint or use it to claim that an individual student service is low-carbon unless a suitable service-level method is separately established.

5. Reporting and review

ID	Action	Owner	Target	Completion evidence	Status
R01	Complete quarterly internal reviews of overdue actions, new risks, incidents and corrective measures	ESG Owner	Quarterly after approval	Review minutes and updated registers	Planned
R02	Publish the first concise ESG progress update, distinguishing completed work from plans and stating assurance status	Director and ESG Owner	30 September 2027	Public update and approval record	Planned
R03	Review this policy suite and action plan with both covered entities	Director	At least annually	Consultation and approval record	Planned
R04	Use relevant professional or supplier training and retain completion evidence	ESG Owner	When relevant training is available	Training completion record	Planned

6. Management approval

Approved by: Baining Wu **Position:** Director **Signature:** Not included in this published copy **Effective date:** 1 August 2026 **Next review date:** 1 August 2027

Reference framework

- Australian Government Modern Slavery Register resources
- GHG Protocol standards and guidance
- Australian National Greenhouse Accounts Factors
- Australian Government Guidance for AI Adoption: Foundations
- OAIC guidance on privacy and commercially available AI

UNILINK ESG 行动计划 2026–2028（中文对照稿）

文件状态

项目	内容
版本	1.0
批准日期	2026 年 8 月 1 日
状态	已批准并生效；行动在证据完成前仍为计划中
计划期间	2026 年 8 月 1 日至 2028 年 9 月 30 日
负责人	Baining Wu，ESG 负责人
复核	每季度内部复核；每年管理层复核
公开位置	https://unilink.co/esg/#action-plan

一、用途

本计划用于落实《负责任经营与 ESG 政策》及《现代奴役与人权声明》，同时作为 UNILINK 的现代奴役行动计划、供应链风险缓解计划和排放管理计划。

本文件是管理计划，不是成果报告。只有列明的证据已经存在并完成复核，相关行动才可以标记为完成。若期限或数据来源不再现实，负责人应记录原因、公开调整行动并保留原始状态历史。

二、治理行动

编号	行动	负责人	时间	完成证据	状态
G01	批准 ESG 文件体系，填写真实生效及复核日期	董事	对外发布前	批准记录和版本历史	已完成 - 2026 年 8 月 1 日批准
G02	书面指定 ESG 负责人、AI 责任人及澳大利亚/中国运营负责人	董事	批准后 30 日内	任命记录	已完成 - Baining Wu：ESG 负责人、AI 责任人及中国运营负责人；Mavis Xiaomao Wang：澳大利亚运营负责人
G03	建立统一 ESG 风险登记和证据登记	ESG 负责人	批准后 60 日内	登记表及首次复核记录	计划中
G04	实施重大利益冲突年度声明，并登记相关礼品、利益和政策例外	ESG 负责人	批准后 90 日内	声明及登记记录	计划中
G05	正式建立保密问题反映、受限案件登记及整改流程，并向全体员工说明	ESG 负责人	批准后 30 日内	流程、员工确认和访问测试	已完成 - 2026 年 8 月：向董事的保密反映渠道（ben@unilink.co）已运行，受限案件登记及整改流程由 ESG 负责人保管，已向全体员工说明

编号	行动	负责人	时间	完成证据	状态
G06	建立重要 AI 系统使用和风险登记，包括目的、责任人、个人信息、人工监督、局限和复核日期	AI 责任人	批准后 90 日内	登记表及首批评估	计划中
G07	按照实际 AI、人脸核验和线上公证用途，复核公开隐私政策及学生提示	AI 责任人	批准后 120 日内	差距复核及整改记录	计划中

三、社会责任、人权与供应链行动

编号	行动	负责人	时间	完成证据	状态
S01	为相关员工提供 ESG、人权、现代奴役、申诉和负责任 AI 培训	ESG 负责人	批准后 90 日内；之后每年	培训内容、签到和确认记录	计划中
S02	完成首份运营及重要供应链类别的人权与现代奴役风险图谱	ESG 负责人	2026-12-31	风险指标、控制和优先级	计划中
S03	对新的重要或较高风险供应商实施分级准入检查及相关合同条款	采购负责人	批准后 90 日内	清单、条款和首份实例	计划中
S04	复核电子设备、劳动密集型服务、宣传品及可接触学生信息的重点存量供应商	采购负责人	2027-06-30	复核登记、问题和行动	计划中
S05	确认每项重要外包服务的再分包、交付地点和责任联系人	采购负责人	2027-06-30	供应商记录及例外清单	计划中
S06	测试问题反映渠道，并确认员工知道内部渠道及适用的外部报告选项	ESG 负责人	批准后 60 日内；之后每年	测试和员工认知记录	计划中
S07	复核学生服务无障碍、身份核验替代方案及重大或争议结果的人工复核渠道	运营负责人	2027-03-31	控制复核及行动清单	计划中

供应商决策流程分为五步：先按服务、地点、用工、数据访问、再分包及产品风险分类；再按风险程度收集信息；记录批准、附条件批准、上报、暂停或拒绝的决定；加入相应合同与监测要求；出现问题时优先保护受影响人员、推动整改并验证结果，严重且无法可信管理时暂停或终止合作。

四、环境与排放管理行动

编号	行动	负责人	时间	完成证据	状态
E01	明确温室气体核算组织边界、运营边界、基准期、数据来源优先级、估算规则及重要范围三筛查方法	ESG 负责人	2026-12-31	经批准的基线方法	计划中
E02	记录 UNILINK 直接控制的办公室能源账单；能源并入租金时向房东或物业索取可用数据	办公室运营负责人	批准后按月	数据表、账单和索取记录	计划中
E03	记录政策生效后预订的公务航班，包括起终点、舱位和目的	办公室运营负责人	自生效日起	差旅登记和预订凭证	计划中
E04	记录政策生效后购入和报废的公司 IT 设备，并说明复用、维修、转让或处置方式	办公室运营负责人	自生效日起	资产及电子废弃物登记	计划中
E05	识别重要云服务和 AI 服务供应商，记录其公开的能源或排放信息及数据缺口	AI 责任人	2027-03-31	供应商清单及来源链接	计划中

编号	行动	负责人	时间	完成证据	状态
E06	落实减少非必要打印、设备能耗、过度采购和废弃物的实际措施	办公室运营负责人	批准后 90 日内	本地清单和抽查记录	计划中
E07	完成 2026/27 财年首份运营温室气体基线，覆盖范围一、范围二，并筛查重要范围三来源	ESG 负责人	2027-09-30	核算表、方法、局限和管理层复核	计划中
E08	判断数据质量是否足以支持量化减排目标；可以则明确边界和路径，不可以则公开缺口及改进步骤	董事与 ESG 负责人	2027-12-31	签署的目标决定或延期说明	计划中
E09	每年使用当期因子复核基线，并解释重大重算或边界变化	ESG 负责人	基线后每年 9 月 30 日	更新核算表和变更记录	计划中

首份基线拟按服务型企业实际情况处理：范围一仅纳入 UNILINK 拥有或控制的直接燃料和制冷剂来源；范围二纳入可取得或可合理估算的办公室购电；重要范围三筛查公务差旅、能够取得有效数据时的员工通勤、云服务和 AI 服务、IT 设备、重要办公室采购和废弃物。

澳大利亚部分在适用时使用当期澳大利亚政府国家温室气体核算因子；其他地区使用当期权威且适合当地的因子。供应商提供的数据只有在边界和方法足够清楚时优先采用。基线必须披露排除项、估算、数据缺口和独立鉴证状态。

五、报告与复核

编号	行动	负责人	时间	完成证据	状态
R01	每季度复核逾期行动、新风险、事件和整改	ESG 负责人	批准后每季度	会议记录和更新登记	计划中
R02	发布首份简明 ESG 进展更新，区分成果与计划并说明鉴证状态	董事与 ESG 负责人	2027-09-30	公开更新及批准记录	计划中
R03	与两个适用主体共同复核政策与行动计划	董事	至少每年	沟通及批准记录	计划中
R04	参加适用的专业或供应商培训并保留完成证明	ESG 负责人	有相关培训时	培训完成记录	计划中

六、管理层批准

批准人： Baining Wu 职务： Director 签名： 本公开版本不含签名 生效日期： 2026 年 8 月 1 日 下次复核日期： 2027 年 8 月 1 日