

UNILINK Modern Slavery & Human Rights Statement

APPROVED AND EFFECTIVE

Field	Detail
Version	1.0
Approval date	1 August 2026
Status	Approved and effective
Statement period	First voluntary statement; baseline position at 1 August 2026
Approver	Baining Wu, Director
Public location	https://unilink.co/esg/#modern-slavery

Approved by Baining Wu, Director. Effective 1 August 2026. This is a voluntary statement, not a statutory statement; it has not been lodged on the Commonwealth register and has not been independently assured.

Important status note

This is a **voluntary** statement of UNILINK's position, risk assessment and planned controls. It is not represented as a statutory modern-slavery statement, has not been lodged on the Australian Government Modern Slavery Statements Register and has not been independently assured.

The Commonwealth Modern Slavery Act 2018 reporting threshold and any other legal reporting obligation should be reassessed if UNILINK's structure, revenue or operations change.

1. Commitment

UNILINK does not tolerate modern slavery or serious labour exploitation in its operations or supply chains. This includes forced labour, human trafficking, slavery, servitude, debt bondage, forced marriage and the worst forms of child labour.

UNILINK recognises that a direct professional-services model lowers some labour risks but does not make the business or its supply chain risk-free. The purpose of this statement is to identify plausible exposure and establish a practical process to prevent, identify, escalate and address concerns.

2. Covered entities, operations and people

This statement covers:

- **UNILINK EDUCATION PTY. LTD.** — ABN 50 152 187 650;
- 盘否教育科技 (北京) 有限公司 — unified social credit code 91110105MA01M1Y31U;
- the Australia and China operations identified in the Responsible Business & ESG Policy; and
- remote and nationally delivered digital services in China.

UNILINK provides education counselling and application support. Its core work is performed directly by its own team. No sub-agents are currently used for its core counselling or application-processing services. This current-state statement was confirmed by the Director on 1 August 2026 and will be reviewed if circumstances change.

3. Supply-chain profile

UNILINK's typical external purchasing and service categories may include:

- landlords, building management and utilities;
- telecommunications, software, cloud and AI services;
- computers, phones and other electronic equipment;
- professional services;
- travel and accommodation;
- office supplies, printing and promotional items; and
- occasional contractors or service providers.

The company does not claim full visibility beyond every direct supplier. Its first objective is to identify material and higher-risk categories, obtain enough information to make a reasoned decision and improve leverage through purchasing and contract terms.

4. Initial risk assessment

UNILINK considers modern-slavery risk by looking at the nature of the work, location, workforce vulnerability, recruitment practices, subcontracting, purchasing pressure, the goods or materials involved, and the amount of visibility available.

The following areas warrant closer attention:

1. **Electronics and IT hardware** — complex upstream manufacturing and mineral supply chains.
2. **Cleaning, facilities and other labour-intensive services** — possible use of temporary, migrant or subcontracted labour.
3. **Promotional merchandise, printing and apparel** — manufacturing, raw-material and subcontracting risks.
4. **Recruitment or outsourced operational services** — recruitment fees, document retention, working-time, pay and subcontracting risks.
5. **Cloud, data and AI supply chains** — outsourced data work, content moderation, hardware and infrastructure exposure, together with privacy and worker-welfare risks.

These are risk indicators, not allegations against any named supplier.

5. Governance

The Director is accountable for this statement and the related action plan. Baining Wu is the ESG Owner and will maintain the risk and evidence registers, coordinate training, assess escalated supplier risks and report material findings to the Director.

Mavis Xiaomao Wang, Australia Operations Lead, and Baining Wu, China Operations Lead, will keep relevant records and escalate concerns. Staff with procurement, hiring, contractor-management or student-service responsibilities must complete the required policy acknowledgement and training.

6. Due diligence and contracting

Before appointing a new material or higher-risk supplier or contractor, UNILINK will apply a proportionate review. Depending on risk, this may cover:

- business registration, ownership and identity;
- location of service delivery and any subcontracting;
- employment and recruitment practices;
- working-time, wage and health-and-safety controls;
- grievance and remediation arrangements;
- privacy, security and data-handling practices;
- adverse findings or credible allegations; and
- willingness to accept relevant contract terms and provide supporting information.

Lower-risk, low-value purchases will not receive the same review as a labour-intensive contractor or a provider with access to student information. Reasons for enhanced review, approval, conditions or rejection will be recorded.

Relevant contracts may require compliance with applicable labour laws, no forced or child labour, disclosure of material subcontracting, cooperation with information requests, notification of serious incidents and proportionate corrective action.

7. Concerns and remediation

Employees, contractors, suppliers, students and other stakeholders may report a concern confidentially to ben@unilink.co with the subject “**Confidential ESG concern**”. Where a concern relates to services supplied to a client, the person's use of that client's applicable complaints or speak-up channel is not restricted.

UNILINK will:

1. acknowledge a report within five business days where contact details are available;
2. assess immediate safety, privacy and retaliation risks;

3. preserve relevant information and restrict access;
4. investigate proportionately or obtain appropriate external support;
5. focus on the safety, wishes and interests of affected people;
6. record corrective and preventive actions; and
7. monitor whether the response is effective.

UNILINK will not automatically terminate a supplier solely to distance the business from a risk. The response will consider the severity and urgency of harm, the supplier's willingness and ability to remediate, UNILINK's leverage, and the risk that sudden termination could worsen outcomes for affected workers. Serious or unremediated conduct may result in suspension or termination.

8. Training and awareness

Within 90 days after this statement becomes effective, relevant staff will receive introductory training covering:

- what modern slavery and serious labour exploitation can look like;
- risk indicators in UNILINK's operations and purchasing;
- supplier questions and escalation points;
- how to handle a disclosure safely; and
- the internal reporting channel and relevant external options.

Training will be repeated at least annually and updated after a material incident or change in risk.

9. Measuring effectiveness

UNILINK will not measure effectiveness only by counting policies or supplier questionnaires. The first review will consider:

- staff policy acknowledgement and training completion;
- proportion of new material or higher-risk suppliers screened before engagement;
- priority existing suppliers reviewed;
- concerns raised, acknowledgement time and corrective actions, without publishing personal details;
- contract terms introduced where relevant;
- overdue actions and recurring weaknesses; and
- whether workers and suppliers know how to raise concerns.

The first public progress update is proposed by 30 September 2027. A lack of reported concerns will not, by itself, be treated as proof that no risks exist.

10. Approval

This statement was approved by the legally authorised Director and took effect on 1 August 2026. Approval confirms the covered entities and the operational commitments that apply to them.

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](#)

UNILINK 现代奴役与人权声明 (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
声明期间	首份自愿声明；反映 2026 年 8 月 1 日的基础情况
批准人	Baining Wu , Director
公开位置	https://unilink.co/esg/#modern-slavery

重要说明

本文件是 UNILINK 的自愿性立场、风险评估和行动声明，不作为已依法提交的现代奴役法定声明，不声称已经在澳大利亚政府现代奴役声明登记册备案，也未经独立鉴证。

如果 UNILINK 的组织结构、收入或业务发生变化，应重新判断《2018 年现代奴役法》门槛及其他报告义务是否适用。

一、承诺

UNILINK 不容忍其运营或供应链中的现代奴役及严重劳动剥削，包括强迫劳动、人口贩运、奴役、劳役、债役、强迫婚姻和最恶劣形式的童工。

直接提供专业服务能够降低部分劳动风险，但不能证明企业及供应链“零风险”。本声明的目的是识别合理可能存在的风险，并建立预防、发现、上报和处置流程。

二、适用主体、业务和人员

本声明覆盖：

- UNILINK EDUCATION PTY. LTD. , ABN 50 152 187 650 ；
- 盘否教育科技 (北京) 有限公司，统一社会信用代码 91110105MA01M1Y31U ；
- 《负责任经营与 ESG 政策》中列明的澳大利亚及中国运营 ；
- 在中国面向全国开展的远程和数字化服务。

UNILINK 提供教育咨询与申请支持，核心业务由自己的团队直接完成。目前核心咨询与申请处理不使用分代理；如情况发生变化，公司将重新复核。

三、供应链概况

UNILINK 的外部采购和服务通常可能包括：

- 房东、楼宇管理和公共事业服务；
- 电信、软件、云服务和 AI 服务；
- 电脑、手机及其他电子设备；
- 专业服务；

- 差旅和住宿；
- 办公用品、印刷和宣传品；
- 偶发的承包商或服务商。

公司不声称能够完全看清每一家直接供应商之后的所有供应链。第一阶段的重点是识别重要及较高风险类别，取得足够信息作出有依据的决定，并通过采购和合同条款逐步增强影响力。

四、初步风险评估

评估现代奴役风险时，UNILINK

将考虑工作性质、地点、劳动者脆弱程度、招聘方式、再分包、采购压力、商品或原材料性质以及供应链透明度。

需要重点关注的领域包括：

1. 电子设备和 IT 硬件：上游制造及矿产供应链复杂；
2. 保洁、物业及其他劳动密集型服务：可能使用临时工、外来务工人员或层层分包；
3. 宣传品、印刷品和服装：制造、原材料及再分包风险；
4. 招聘或外包运营服务：招聘费、证件扣留、工时、工资及再分包风险；
5. 云、数据及 AI 供应链：外包数据工作、内容审核、硬件和基础设施，以及隐私与劳动者福祉风险。

上述内容仅为风险指标，不是对任何具体供应商的指控。

五、治理安排

董事对本声明及配套行动计划承担最终责任。Baining Wu 担任 ESG

负责人，维护风险与证据登记、组织培训、评估上报的供应商风险，并向董事报告重大问题。

Mavis Xiaomao Wang 担任澳大利亚运营负责人，Baining Wu 担任中国运营负责人，分别保存相关记录并上报问题。负责采购、招聘、承包商管理或学生服务的员工应完成政策确认和所需培训。

六、尽职调查与合同管理

聘用新的重要或较高风险供应商、承包商前，UNILINK 将按风险程度进行审查，可能包括：

- 主体登记、所有权和身份；
- 服务地点及是否再分包；
- 用工和招聘方式；
- 工时、工资与职业健康安全控制；
- 投诉和补救安排；
- 隐私、安全及数据处理；
- 已有负面认定或可信指控；
- 是否愿意接受相关合同条款并提供证据。

低风险、低金额采购不会按照劳动密集型承包商或能够接触学生信息的服务商同等审查。加强审查、附条件批准或拒绝的理由应予记录。

相关合同可要求遵守适用劳动法、禁止强迫劳动和童工、披露重大再分包、配合信息请求、报告严重事件并采取与风险相称的整改措施。

七、问题反映与补救

员工、承包商、供应商、学生及其他相关人员可发送邮件至 ben@unilink.co，主题注明“Confidential ESG concern”，保密反映问题。如问题涉及向客户提供的服务，反映人使用该客户适用的投诉或问题反映渠道不受限制。

UNILINK 将：

1. 在留有联系方式时，力争五个工作日内确认收悉；
2. 评估即时安全、隐私和报复风险；
3. 保存相关信息并限制访问；
4. 按问题性质开展调查或寻求适当外部支持；
5. 优先考虑受影响人员的安全、意愿和利益；
6. 记录纠正和预防措施；
7. 复核处置是否有效。

UNILINK

不会仅为了与风险划清界限而自动终止供应商。处置应考虑伤害严重性和紧迫性、供应商整改意愿与能力、UNILINK 的影响力，以及突然终止合作是否反而恶化劳动者处境。对于严重或拒不整改的问题，可以暂停或终止合作。

八、培训与认知

本声明生效后 90 日内，相关员工将接受初步培训，内容包括：

- 现代奴役和严重劳动剥削的表现；
- UNILINK 运营及采购中的风险指标；
- 供应商提问和上报节点；
- 如何安全处理问题披露；
- 内部报告渠道及适用的外部渠道。

培训至少每年重复一次；发生重大事件或风险变化后应及时更新。

九、有效性评估

UNILINK 不会只用政策数量或供应商问卷数量判断效果。首次复核将关注：

- 员工政策确认和培训完成情况；
- 新的重要或较高风险供应商在合作前完成筛查的比例；
- 已复核的重点存量供应商；
- 问题数量、确认时间和整改情况，但不公开个人信息；
- 相关合同条款的引入情况；
- 逾期行动和重复出现的薄弱环节；
- 员工及供应商是否知道如何反映问题。

首份公开进展更新拟于 2027 年 9 月 30 日前发布。没有收到问题报告，不能单独证明风险不存在。

十、批准

本声明已由依法有权批准的董事批准，并于 2026 年 8 月 1 日生效；批准同时确认适用主体及与其运营有关的承诺。

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