

EY Australia Modern Slavery Statement

FY24



The better the question. The better the answer.
The better the world works.



Shape the future
with confidence



Acknowledgement of Country

EY Australia acknowledges Aboriginal and Torres Strait Islander peoples as the first people of Australia and the Traditional Owners of this land and its waters. We pay our respects to Elders, knowledge holders and leaders both past and present.

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This statement is made on behalf of reporting entities Ernst & Young, Ernst & Young Services Trust, and EY Business Solutions Pty Ltd (together "EY Australia", "we", "us" or "our"). This is EY Australia's fifth statement, prepared in accordance with the requirements of the Modern Slavery Act 2018 (the Act) for the reporting period from 1 July 2023 to 30 June 2024 (FY24). Ernst & Young in Australia is a partnership and a member firm of Ernst & Young Global (EYG) Limited, a UK company limited by guarantee. The EY organisation owns and controls subsidiary entities and the activities of these entities are included in this statement.

Consultation activities to prepare the statement

EY Australia has a centralised management structure to govern its Australian operations, including Ernst & Young, Ernst & Young Services Trust, EY Business Solutions Pty Ltd (and the entities they own or control) with shared policies, procedures, and business functions to oversee business activities, including modern slavery risk management. The centralised management structure enables EY Australia to operate and govern our modern slavery program as a single, integrated group. This includes, among other things, due diligence activities, implemented controls, modern slavery risk assessments, and the preparation of our annual modern slavery statement.

Our modern slavery program team, which is made up of subject matter professionals from the EY Climate Change and Sustainability Services practice, supported the preparation of this statement in consultation with our Human Rights and Modern Slavery Working Group. The Working Group is made up of key stakeholders representing our core business functions, including risk management, legal, operations, finance, procurement, talent and the sustainability office, whose roles and responsibilities sit across the reporting entities, including the entities owned and controlled by the reporting entities. Consultation activities facilitated communication across EY Australia regarding the reporting requirements, including actions taken and planned actions to address the requirements. Each reporting entity, including entities owned and controlled by the reporting entities, were engaged on an ongoing basis as part of this approach, facilitating the preparation of this joint statement.

This statement is a joint statement made on behalf of the following reporting entities - Ernst & Young (ABN: 75 288 172 749), Ernst & Young Services Trust (ABN: 67 457 905 811) and EY Business Solutions Pty Ltd (ABN: 35 122 885 465).

This statement has been approved by the principal governing body of Ernst & Young, Ernst & Young Services Trust and EY Business Solutions Pty Ltd on or around 17 December 2024.

01 Message from our Chief Sustainability Officer and Chief Executive Officer

Thank you for taking the time to read our 2024 Modern Slavery Statement. This statement presents strong progress against commitments established in previous years with attention focused on better understanding and mitigating modern slavery risks. As always, our efforts are driven by our core purpose of 'building a better working world', in particular our aspiration to build the social foundation of the communities in which we operate whilst driving purposeful growth for society and the EY organisation.

A year on from the release of the Independent Review into Workplace Culture, we have prioritised enhanced workplace safety through efforts that seek to clarify our expectations and empower EY people to cultivate a safe and inclusive EY organisation. In the context of modern slavery, this process serves to reinforce the right of all people to enjoy a safe and healthy working environment, free from any form of mistreatment. Our mission to respect and promote human rights must remain constant, particularly as we navigate the proliferation of artificial intelligence and technological advancements changing the workplace and our control of information. We will continue to work hard to foster a trustworthy and transparent environment where people thrive and problems are solved.

As ever, we invite your feedback and collaboration.

Sincerely,



Mathew Nelson
EY Regional Chief Sustainability Officer,
Oceania



David Larocca
EY Regional Managing Partner and CEO,
Oceania



02

Key areas of
action in FY24

02 Key areas of action in FY24

We continued to strengthen our modern slavery program during the reporting period, with a focus on including additional controls to better understand and mitigate modern slavery risks within our operations and supply chain. We built on preliminary activities with key suppliers and sought to better understand the actions needed to address those risks. We have focused on due diligence activities and implementing additional controls in the procurement process to better understand the modern slavery risks, and the causal relationship between our actions and potential impacts. This included direct engagement with stakeholders through management discussions and unmonitored worker interviews to gain perspective on the impact of our actions, and the actions of others, on potentially impacted individuals.

We also strengthened the modern slavery provisions in our supplier agreement to help us improve how we manage risks in our supply chain and developed an approach to assessing the effectiveness of our program through the development of a monitoring and evaluation framework.

Looking ahead to FY25, we will continue to prioritise risk-based due diligence activities through on-the-ground engagement with rightsholders, meaning individuals or groups whose human rights are respected and protected by states, international institutions, and private actors.

At a glance - our FY24 actions

Evaluate			Enhance			Monitor			
Activities to improve visibility and awareness of modern slavery risks and controls to better understand how modern slavery and labour rights issues are managed, and to identify practices and conditions to be improved.			Activities to enhance employment practices and improve working conditions for workers, including any remediation actions as required.			Activities to monitor the ongoing implementation of improvement or remediation actions and further enhancement areas identified.			
Identify inherent risks	Understand risks profile and controls	Identify actual impacts and controls	Identify improvement actions	Communicate actions and support uplift	Activities vary on case-by-case basis				
Outsourced service providers	Merchandise provider	Technology hardware provider	Real estate	Outsourced service provider	Cleaning services provider	Offshore member firm	In Progress Complete		
Modern Slavery Program Enablers									
	Governance	Grievance and remediation	Assessing effectiveness	Capacity building	Client engagement terms				
FY24 commitments	Continue to consult and collaborate with member firms in other geographies to improve how we manage our modern slavery risks and impacts as a global organisation.	Continue to enhance our grievance and remediation processes to improve how we record and respond to human rights and modern slavery related complaints.	Continue the development of a framework to assess the effectiveness of our modern slavery program in identifying and addressing risks within our operations.	Work with internal teams and external suppliers to improve both our understanding of modern slavery risks and the ability to respond to those risks.	Update our general terms and conditions for client engagements to include modern slavery considerations.				
Progress on FY24 commitments	We hosted quarterly Human Rights and Modern Slavery Working Group meetings during the reporting period and held initial discussions with the EY Global Internal Audit function in relation to managing modern slavery risks across other member firms.	During the reporting period, the Culture+ program appointed Ombpoint as an independent ombudsman service, redesigning the internal complaints process.	We developed a process for monitoring and evaluation that allows us to track the effectiveness of our program at mitigating modern slavery risk in our operations and supply chain.	We provided annual modern slavery training to our procurement team members and delivered capacity building sessions to relevant business functions and the Executive Leadership Team. We also piloted training for suppliers through optional awareness raising and education webinars.	We updated the modern slavery clause included in the general terms and conditions for client engagements to extend our modern slavery efforts downstream through our client relationships.				
Due Diligence Activities									
	Operational Due Diligence Activities			Supply Chain Due Diligence Activities					
	Other member firms	Outsourced service provider (on-site engagement)	Outsourced service providers (desktop engagement)	Technology hardware provider	Real estate	Cleaning services provider	Merchandise provider		
FY24 commitments	Continue to collaborate with other member firms and outsourced service provider to finalise outcomes of due diligence activities and perform ongoing consultation and monitoring activities in relation to improvement opportunities.	We will continue engagement with selected outsourced service providers to inform appropriate levels of due diligence to be conducted.		Conduct targeted due diligence activities for our largest technology hardware suppliers.	Commence pilot due diligence activities for upcoming capital expenditure projects.	Conduct pilot due diligence activities for a selected cleaning service provider.	Commence additional due diligence activities for our primary merchandise supplier including an assessment of existing modern slavery controls, stakeholder engagement to further understand risk profile, and a site assessment to observe working conditions.		
Progress on FY24 commitments	We progressed due diligence activities initiated for other member firms and outsourced service provider in FY23.	We worked with relevant internal relationship managers of selected outsourced service providers to gain a clearer understanding of the risk profile and developed bespoke due diligence approaches commensurate to the risk which will be executed in FY25. We also developed unique self-assessment questionnaires to assess each provider's modern slavery controls.	We initiated a human rights and modern slavery assessment for our primary technology hardware provider.	We collaborated with our Real Estate Services team to embed modern slavery and human rights considerations into upcoming capital expenditure projects.	We engaged with three of our largest cleaning service providers to gain a deeper understanding of how they mitigate modern slavery and broader labour rights risks. Following this initial engagement, we completed further due diligence for the cleaning provider for one of our office locations which involved unmonitored worker interviews.	EY Australia went to tender for a new primary merchandise provider in FY24. The Supply Chain Services team collaborated with the Modern Slavery Program team to embed modern slavery and human rights considerations throughout the tender process for merchandise.			

03

Our position, commitments
and governance

03 Our position, commitments and governance

Our position

The EY organisation believes that upholding human rights is fundamental to our purpose of building a better working world. Our approach to respecting and upholding the rights of all EY people and those with whom we interact is informed by the United Nations Guiding Principles on Business and Human Rights. This set of principles holds us accountable for avoiding adverse impacts through our own activities and business relationships.

In addition, the EY organisation seeks to proactively support and promote human rights for the wider benefit of the communities in which we operate. Modern slavery is an abhorrent crime, and we know we have a duty to use our position to raise awareness and motivate action.

EY is exposed to human rights risks through our business activities, client relationships and the obligations of our purpose

The diagram below shows our value chain, rightsholders and potential involvement – how we may cause, contribute to, or be directly linked to human rights risks and impacts. It is critical that we understand our potential involvement to inform how we address and remediate the impact.



Value chain	Rights holders	Potential involvement
Operations	Direct and indirect workforce	Potential to cause, contribute or be directly linked
Supply chains	Suppliers, suppliers' workforce and subcontractors	Potential to contribute or be directly linked
Clients	Clients, clients' workforce and supply chains	Potential to contribute or be directly linked
Communities	Wider communities	Potential to contribute or be directly linked
Type of potential involvement		
Cause	Contribute	Directly linked to
Degree of involvement		
Causes harm through own acts or omissions	Contributes to harm through own acts or omissions	Directly linked to harm through operations, products or services by a business relationship
Appropriate action		
Cease or prevent impact, and provide/cooperate in remediation	Cease or prevent contribution, use leverage to address remaining impact and provide/cooperate in remediation	Use leverage to seek to prevent and mitigate impact

Our commitments

We have overarching modern slavery commitments which guide our strategy, provide direction for ongoing activities, and act as a point of reference to review and direct our approach to modern slavery and broader human rights management for the EY member firms in the Oceania region.

Our modern slavery commitments

1

We know modern slavery exists within our supply chain; experience tells us that there will be modern slavery within our extensive value chains. We will actively work with our suppliers to find exploitative practices and will take immediate action to put an end to them, providing or facilitating effective remediation of harm. We will undertake further work to understand the drivers, including our causal relationship, to inform our approach to prevent future harm.

2

We have a duty to use our position and influence to raise awareness, identify and address modern slavery within our operations and supply chains. We will use our global business relationships to drive on-the-ground improvement in the labour rights of our direct and indirect workforce.

3

Our strategic business relationships provide an opportunity to drive immediate and urgent action. We will participate in multi-stakeholder dialogues to further advance the business and human rights agenda, both locally and globally, with a focus on investigating and mitigating the root causes of issues.

4

Risk-based due diligence is our best hope for finding and addressing slavery. We will undertake due diligence through on-the-ground engagement with potentially impacted workers throughout our value chain.

5

We will work with our stakeholders to identify modern slavery risks and impacts, and to facilitate and provide appropriate remedies to impacted people. We will work to establish trust in the remedial mechanisms available to workers within our operations and supply chain to improve the identification of indicators and instances of modern slavery within our value chain.

6

We must continually improve our approach. We will continue to review and enhance the effectiveness of our response to modern slavery and report on our progress transparently each year, at a minimum. This will involve meaningful engagement and consultation with leading academics, rightsholders in our value chain and those with lived experience as we seek to strengthen the effectiveness of our response.

Our governance

Our position and response to modern slavery and broader human rights issues is supported by our global and local policies, which are reviewed and updated periodically. Our key policy documents include our Global Code of Conduct, Global Human Rights Statement and Global Supplier Code of Conduct.

Global Code of Conduct

Our Global Code of Conduct is a clear set of standards for our business conduct. It provides the ethical and behavioural framework on which we base our decisions every day. All EY people are required to confirm that they will comply with the Code.

Global Human Rights Statement

The EY Global Human Rights Statement was endorsed by our Global Executive which brings together EY leadership functions, services and geographies, and its subcommittee, the Corporate Responsibility Governance Council. The statement establishes our commitment and approach to upholding and promoting fundamental human rights.

Global Supplier Code of Conduct

Our Global Supplier Code of Conduct establishes a shared understanding with suppliers of our minimum expectations and standards regarding modern slavery and broader human rights issues.

Modern slavery governance structure

Our modern slavery governance structure remains consistent with previous reporting periods. The Human Rights and Modern Slavery Working Group convened quarterly during the reporting period to discuss progress on due diligence activities, implementation of controls, and challenges emerging from modern slavery risk management. An overview of the modern slavery governance structure is outlined below.

Oversight	Regional Partner Forum			
	Advisory forum to the Oceania Executive Leadership Team.			
	Executive Leadership Team			
		Oversee and review the management, administration and governance of EY Australia and the other EY member firms (New Zealand, Fiji and Papua New Guinea) in the Oceania region.		
		Updates on the modern slavery program are communicated to relevant members of the Executive Leadership Team during Human Rights and Modern Slavery Working Group meetings.		
		Human Rights and Modern Slavery Working Group		
		Our cross-functional Human Rights and Modern Slavery Working Group, which is made up of representatives from our core business functions, including risk management, legal, operations, finance, procurement, talent and the sustainability office, oversee human rights and modern slavery matters within EY operations and supply chain. The working group includes members of the Executive Leadership Team, and the Chief Sustainability Officer.		
Ownership	Chief Sustainability Officer			
		Our Chief Sustainability Officer is responsible for the modern slavery program and the modern slavery program team. Our Chief Sustainability Officer reports to the broader Executive Leadership Team.		
Management and execution	Modern Slavery Program Team	Procurement	Other business functions	
		Responsible for supplier modern slavery risk screening and including modern slavery considerations in supplier agreements and engagement. Supported by the modern slavery program team and other dedicated operational staff to integrate modern slavery considerations into supplier relationships.	Our core business functions, including risk, legal, operations, finance, procurement and talent are responsible for integrating relevant elements of modern slavery management.	



04

Our operations
and supply chain

04 Our operations and supply chain

Our position

The EY purpose of building a better working world guides us to deliver impactful solutions that have a long-lasting, positive impact on our clients and their stakeholders. We are also driven to improve our own practices by fostering a positive working environment for all EY people. The EY organisation is committed to supporting a world free of modern slavery and works with clients to strengthen the management of their human rights risks, to improve the livelihoods of the workforce in their value chains. Our established network of multidisciplinary teams, operating out of over 150 countries across more than 700 office locations, bring a diversity of knowledge, skills and experience. EY Australia employed approximately 9,500 people across our eleven Australian offices, as at 30 June 2024.

Our operations are supported by entities in the EY network which operate in various locations globally. All EY member firms are required to comply with the EY Human

Rights Statement, the EY Global Code of Conduct and with local laws ensuring consistent commitment by EY to management of human rights risk. The most significant locations which supported our operations in FY24 were India with approximately 1,200 people (FTE*) and the Philippines with approximately 1,090 people (FTE*) providing support to EY Australia.

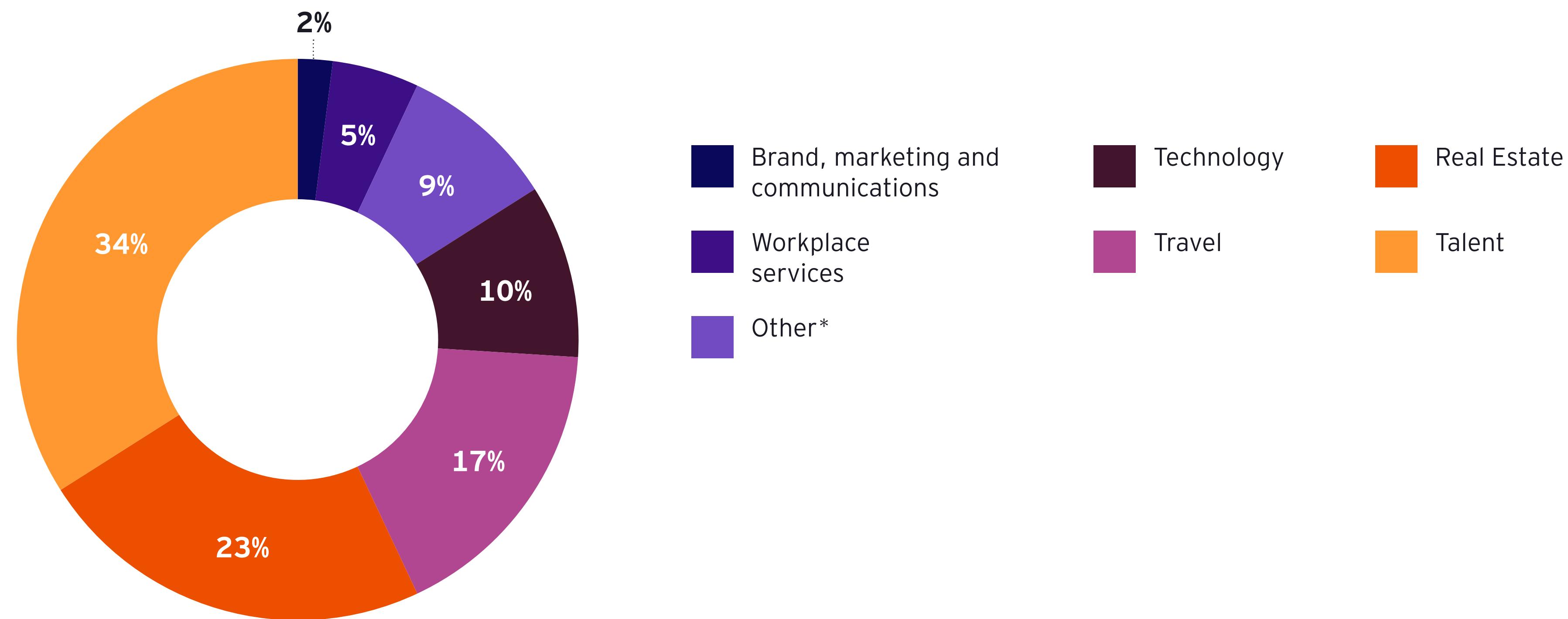
Outsourced service providers based in offshore locations including India, Malaysia and the Philippines, also provide support across finance and accounting services, IT help desk support and payroll services. The map below illustrates the locations of EY Australia's operation and the location of our offshore support.



*FTE (full time equivalent) includes business, compliance and administrative support as well as client and enablement support, the client and enablement FTE has been calculated based on approximately 25.6 hours per week for 50 weeks a year given that our offshore team members do not work solely on EY Australia projects and for comparability purposes with FY23 figures.

Our supply chain overview

During FY24, EY Australia procured goods and services from around 17,600 suppliers from 84 countries, with goods and services falling into six main procurement categories. Our supplier data includes transactions made by our member firm partners and employees on corporate credit cards and company accounts which relate to business purposes such as travel, meetings and events. In FY24, our total supply chain spend was approximately \$450,000,000. An overview of the breakdown of our supply chain spend is included below by the types of products and services procured.



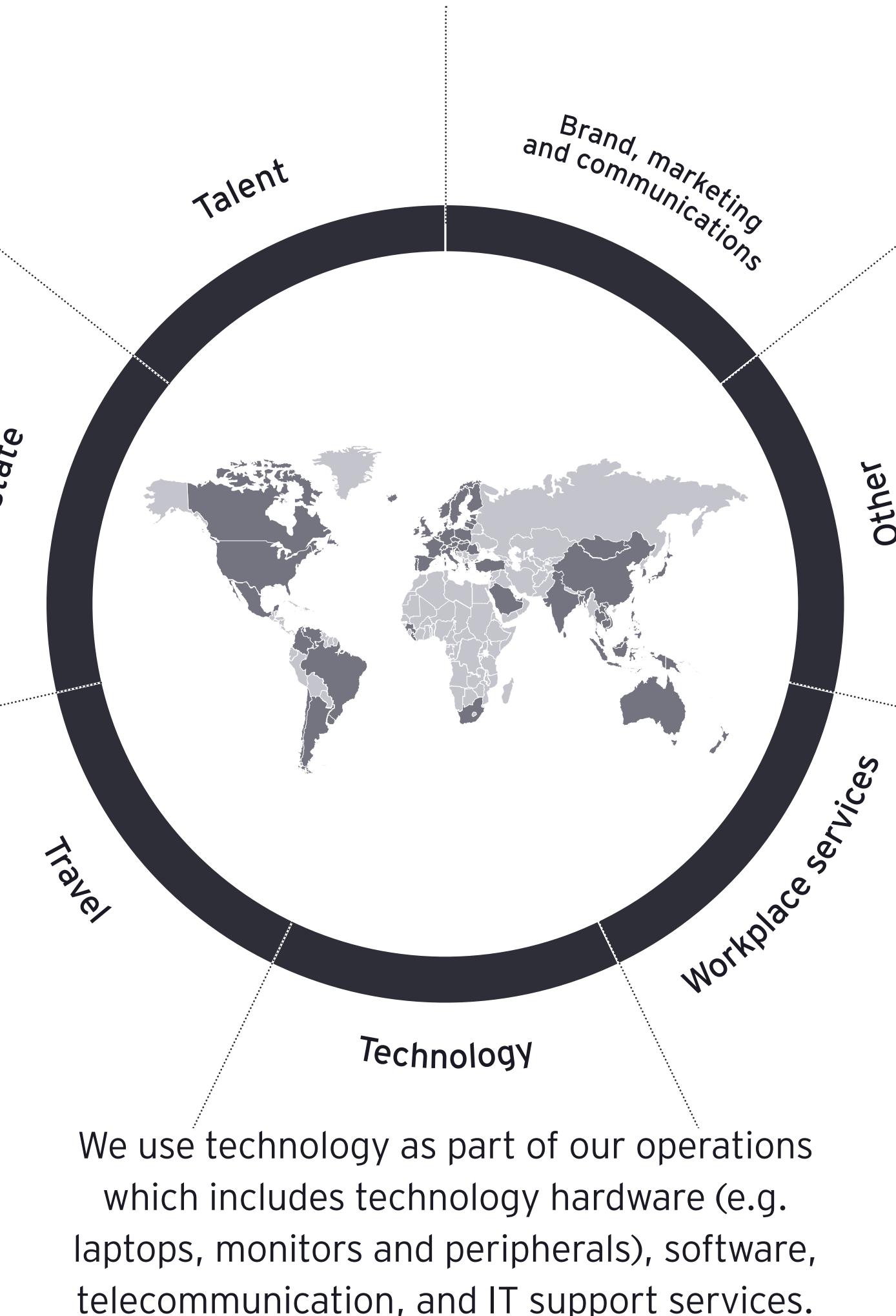
*Other includes goods and services encompassing banking, education, entertainment, financial, government, health care, professional and retail.

Our supply chain categories

We engage recruitment agencies to help us to continue to identify the best talent, as well as source learning and development goods and services to continue to build the capability and nurture the wellbeing of our people.

We operate in office buildings, which involves the procurement of construction products and services as part of periodic office builds, fit outs and refurbishments.

We continue to connect with our peers and clients through business travel, which includes air travel, hotels, meals, venues, and ground transportation.

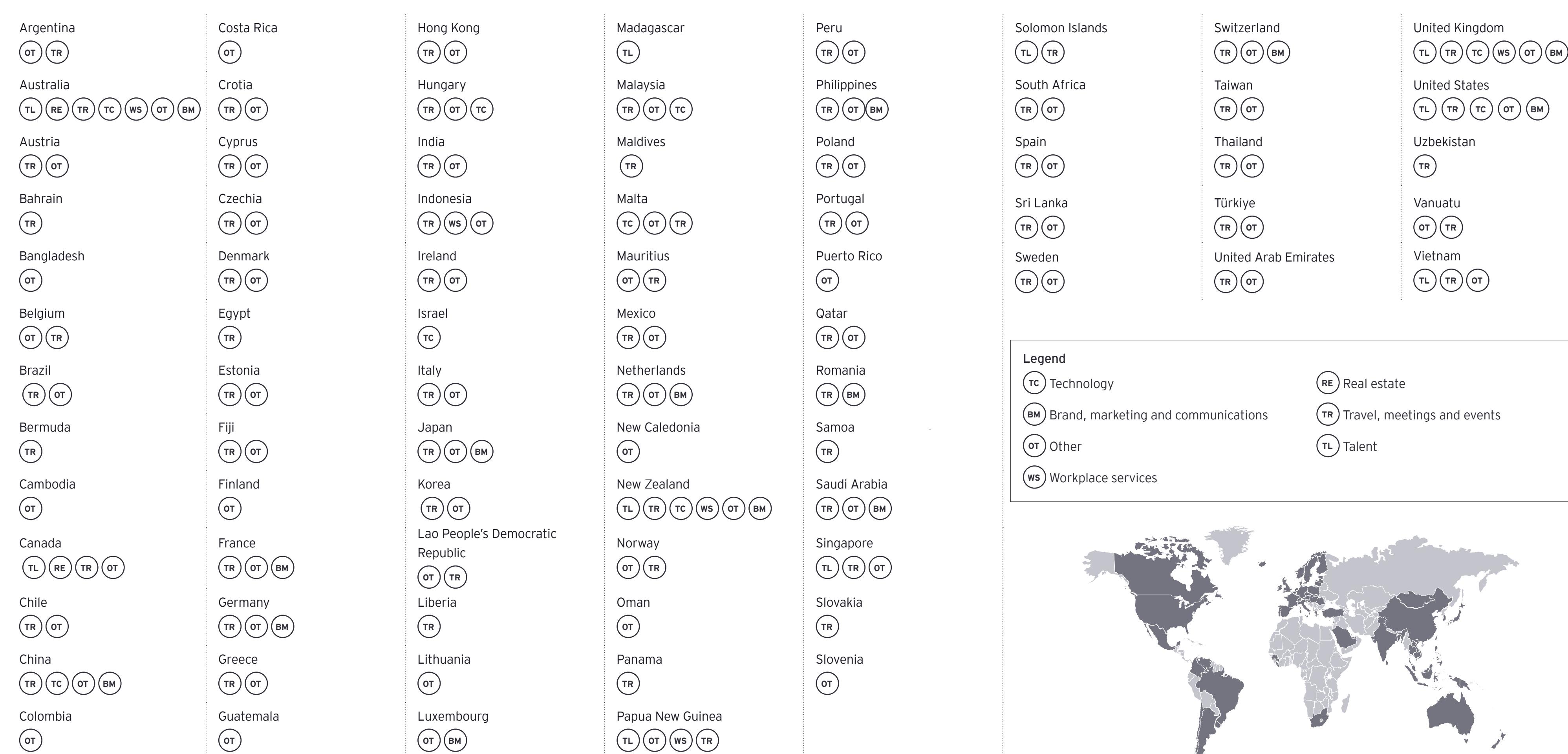


We use a range of goods and services to support our brand, marketing and communication activities, including publications, digital banners, sponsorships and promotional merchandise such as water bottles, t-shirts, notepads and stationery.

We use a variety of services encompassing banking, education, entertainment, financial, government, health care, professional and retail.

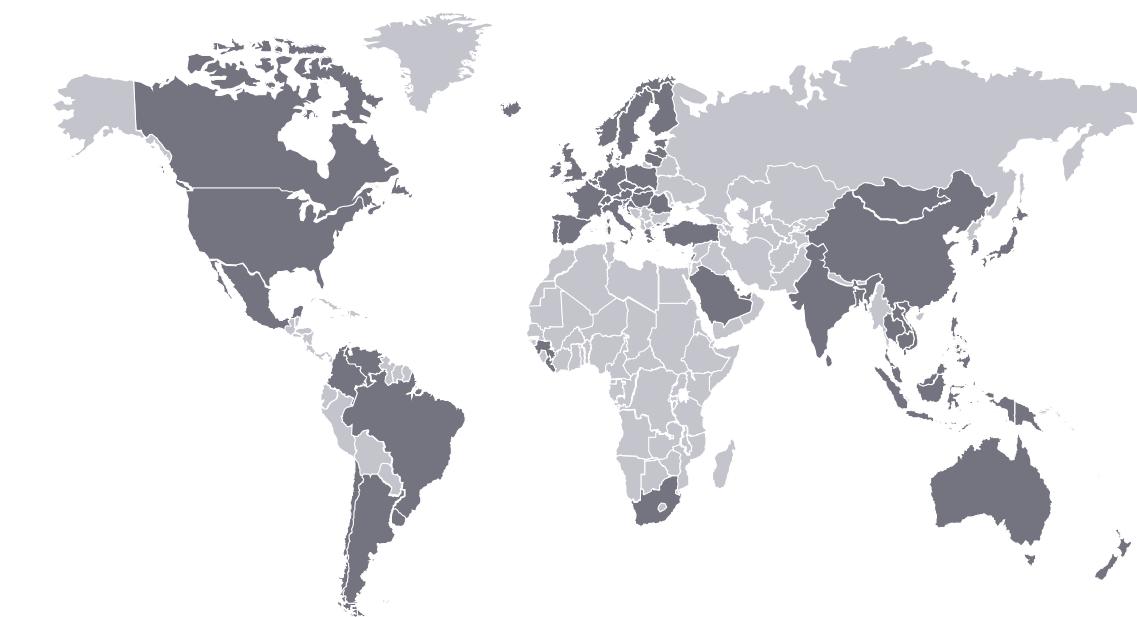
We use a range of goods and services in our offices such as office equipment and supplies, and onsite services such as cleaning, catering, and property maintenance.

Our supplier locations



Legend

- TC Technology
- RE Real estate
- BM Brand, marketing and communications
- TR Travel, meetings and events
- OT Other
- TL Talent
- WS Workplace services





05

Our approach to managing
modern slavery risks

05 Our approach to managing modern slavery risks

Modern slavery risk

EY Australia uses the EY ESG Risk Tool to conduct an annual risk assessment and prioritisation assessment of its operations and Tier 1 suppliers to determine inherent modern slavery risks. Tier 1 suppliers refer to those providers who supply goods and/or services directly to us. The tool considers country and industry risk factors to determine an inherent risk score for forced and bonded labour and child labour.

Based on this assessment, EY Australia undertakes a prioritisation assessment considering the following factors:

1. The level of inherent modern slavery risk present
2. The causal link between the labour rights issues and the EY organisation, including the degree of influence over the business relationship
3. Whether the product or service is core to our business operations

In FY24, EY Australia reviewed and updated the industry and country scoring in the EY ESG Risk Tool to incorporate the latest indexes, databases and known risk factors.

Country risks were assessed through an analysis of credible indexes and databases. For example, the statistics on forced labour and child labour published by the International Labour Organisation.

Industry risks were assessed by considering known industry risk factors, such as the use of unskilled, temporary, or seasonal labour, short-term contracts, outsourced labour, foreign workers, the presence of opaque intermediaries, as well as whether there are known labour rights controversies within the industry.

Modern slavery risks in our operations

Direct workforce

The inherent modern slavery risks for our direct workforce continues to be low. The lower risk of forced labour, child labour and other forms of modern slavery in Australia, the office-based working environment and the skilled nature of work, which are characteristic of the professional services industry, and a lower proportion of vulnerable workers, contribute to our assessment of the risks and the low-risk rating. While the risk of modern slavery within our direct workforce continues to be low, we acknowledge that there are broader labour-related issues associated with the professional services industry, in particular the potential for long working hours. A progress update on our response to the review into workplace culture and improvements during the reporting period is outlined on page 22.

Our approach to managing modern slavery risks for our direct workforce

Our approach to managing modern slavery risks within our operations is driven by our governance structure, zero-tolerance position regarding modern slavery within our operations, and our policies and procedures.

We continue to provide all employees with written employment agreements to clearly communicate working rights and terms of employment, including (but not limited to) working hours, remuneration and notice periods for people who choose to depart the firm. Our Talent team confirms appropriate visa status of our employees during onboarding and confirms, manages and monitors working entitlements in line with Australian legislation. We also maintain compliance with Australia's workplace relations laws, health and safety laws and regulations, and have health and safety policies and procedures in place.

In FY23, we commenced the development of a Psychosocial Risk Management Framework to improve how we manage psychological and social health and safety risks within our workforce. The review was ongoing throughout the FY24 reporting period, led by psychologists from our client-facing Health and Safety team. Our goal is to establish the processes, structures and services that we need to protect and enhance the mental health of our people. Our grievance and remediation processes also form part of our approach to managing operational modern slavery risks, discussed in more detail on page 30.

Independent Review into Workplace Culture

Modern slavery sits along a broader continuum of human rights priorities, including decent and respectful work, the right for all EY people to enjoy a safe and healthy working environment, and to be free from discrimination, harassment and other forms of mistreatment.

In September 2022, we commissioned Elizabeth Broderick & Co (EB&Co) to lead an independent and comprehensive examination of workplace culture within the EY Australian and New Zealand member firms, following the tragic death of a colleague in the Sydney office. The review examined our workplace culture and behaviours, work practices and psychosocial health and safety.

The final report from the culture review was released in July 2023, and whilst it was determined that the vast majority of people feel safe within their workplaces and believe that people behave in a respectful manner, there were, however, reports of people experiencing bullying, harassment and racism. Long working hours and

overwork were also highlighted as a critical issue having a negative impact on individual wellbeing, team cohesion and retention.

Recognising the right of all EY people to decent and respectful work free from discrimination, harassment and other forms of mistreatment, our leadership committed to listening, testing, and learning. Throughout the reporting period EY leaders have sought to identify strengths, areas for improvement, and actionable steps to enhance the safety, inclusivity, and respect within our workplace. Sharing the EB&Co findings publicly reflects our commitment to transparency and change.

A year has passed since the release of the EB&Co Report, marking the beginning of our cultural change. We have made progress on all recommendations, with some in planning stage and others completed. Our primary focus has been enhancing workplace safety. Initiatives such as launching Sonder for wellbeing and safety, appointing Ombpoint as an independent

ombudsman service, redesigning our internal complaints process, and refreshing our Bystander Intervention training have been crucial.

These efforts clarify our expectations and empower EY people to cultivate a safe and inclusive EY organisation.

We acknowledge that there are no all-encompassing solutions in the complex landscape of cultural change. While addressing symptoms may be straightforward, our focus is on resolving the root causes that challenge our culture. This requires a co-designed change process, inclusive of all stakeholders, and demands significant time and effort. We are committed working with EY people in finding solutions to ease the workload pressures on our people and balance productivity and wellbeing. We are taking a human-centred approach, focusing on areas such as how we scope, cost and resource projects, and how we manage time off in lieu to work more sustainably.

Our plans for FY25

The next phase of our cultural change journey will focus on ensuring tangible impacts on the ground. In July 2024, a Statement of Commitment signed by the region's lead member firm partners marked the beginning of this new chapter, developed with input from the Executive Leadership Team and the Regional Partner Forum. This statement signifies our shared responsibility to create a safe, inclusive and sustainable EY organisation across the Oceania region.

Indirect workforce

EY Australia outsources work to entities in the EY network which operate in various locations globally, the most significant of which include India and the Philippines.

We also outsource work to outsourced service providers based in locations including India, Malaysia and the Philippines.

We are aware that outsourcing work to offshore locations exposes our operations to several labour rights issues associated with poor working conditions, a lack of transparency over workers' rights, underpayment and weaker workplace relations policies common within these countries. As a result, there is a higher inherent risk of modern slavery affiliated with the work carried out by our indirect workforce. Similar to EY Australia, long working hours and overwork are also likely a critical issue within our indirect workforce, which may have a negative impact on individual wellbeing and the right to a safe and healthy working environment.

Due to the global nature of our business and our work, we may collaborate with other EY member firms on a project specific basis. However, the boundary of our activities does not extend to the broader network of EY member firms. It is important that we continue to build on our current view of the risks, impacts and risk mitigation measures, including actively addressing and monitoring any identified improvement areas.

Our approach to managing modern slavery risks for our indirect workforce

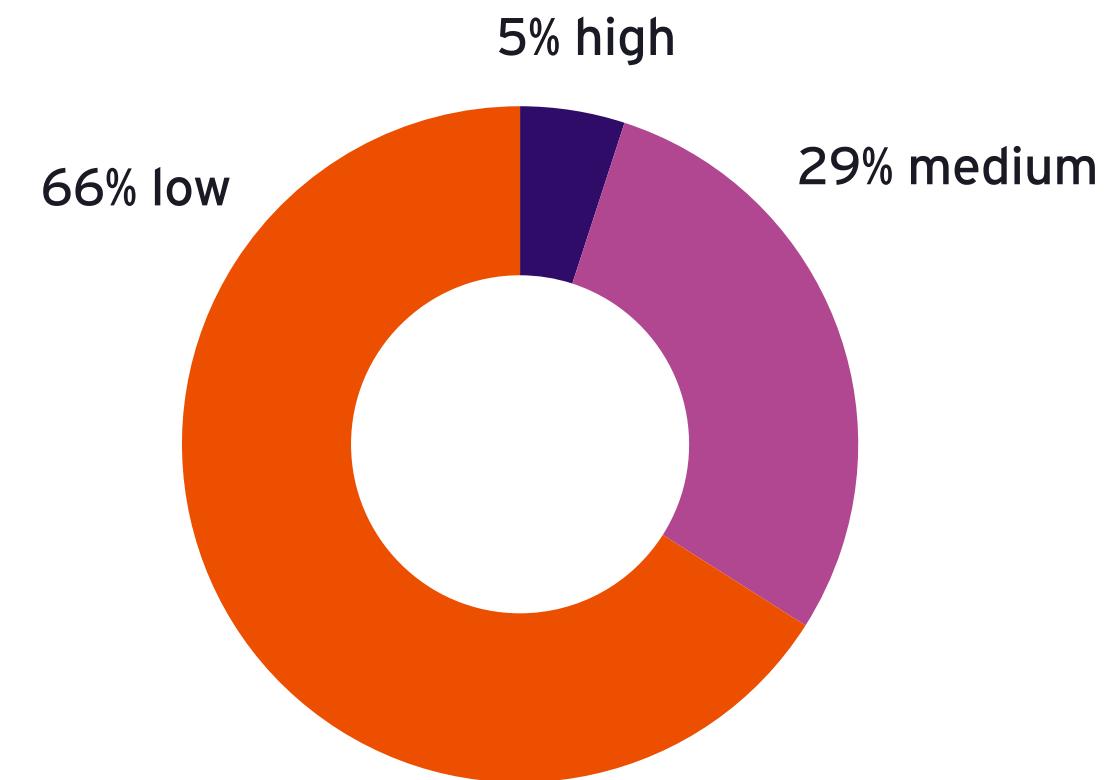
EY policies relevant to labour rights, health and safety and entitlements also govern our indirect workforce in offshore member firms. Our indirect workforce is also subject to working rights in accordance with relevant local laws. We will continue to expand our efforts to engage with our offshore member firms and outsourced service providers through additional human rights due diligence.

During FY24, we continued to engage, through our global internal audit team, with the offshore EY member firm for which we completed an in-country assessment in FY23 to obtain additional information relevant to the assessment. We are finalising our recommendations based on this information and will work collaboratively with our offshore member firm to implement improvement activities, as required, and to enhance modern slavery and broader labour-related controls. We recognise the importance of considering the broader potential human rights impacts to our value chain, enhancing employment conditions and improving working conditions.

Modern slavery risks in our supply chain

The figure below contains a breakdown of the inherent modern slavery risk level of our direct and indirect supplier base in FY24. This inherent risk breakdown includes transactions made by our member firm partners and employees on corporate credit cards and company accounts which relate to business purposes such as travel, meetings and events.

Supplier modern slavery inherent risks



Results from our annual risk assessment over Tier 1 suppliers indicated that based on country and industry risk factors, the majority of our suppliers fall within the low and medium inherent risk categories, as per previous years. Only a small portion were found to have a high inherent risk of modern slavery.

We recognise that modern slavery and other exploitative practices can be difficult to identify, especially deeper within supply chains where the inherent risk of modern slavery may be elevated due to industry-led demand for low-skilled or migrant labour, poor treatment of workers and substandard working conditions. As such, we acknowledge the existence of modern slavery risks across our extensive value chain. To better our understanding of risks associated with our suppliers, we must improve the quality of our supplier data. We continue to collaborate with other EY member firms to develop a solution to strengthen the quality of this data and to increase our visibility over our extended supply chain, including tier two suppliers and beyond.

Our approach to managing modern slavery risks in our supply chain

Our procurement practices are influenced by global policies and procedures, including the EY Global Procurement and Supply Chain Policy and EY Global Supplier Code of Conduct. These key policy documents establish minimum expectations for our suppliers and guide our approach to managing modern slavery risks in our supply chain. This is actioned through due diligence activities, modern slavery training, and grievance and remediation processes.

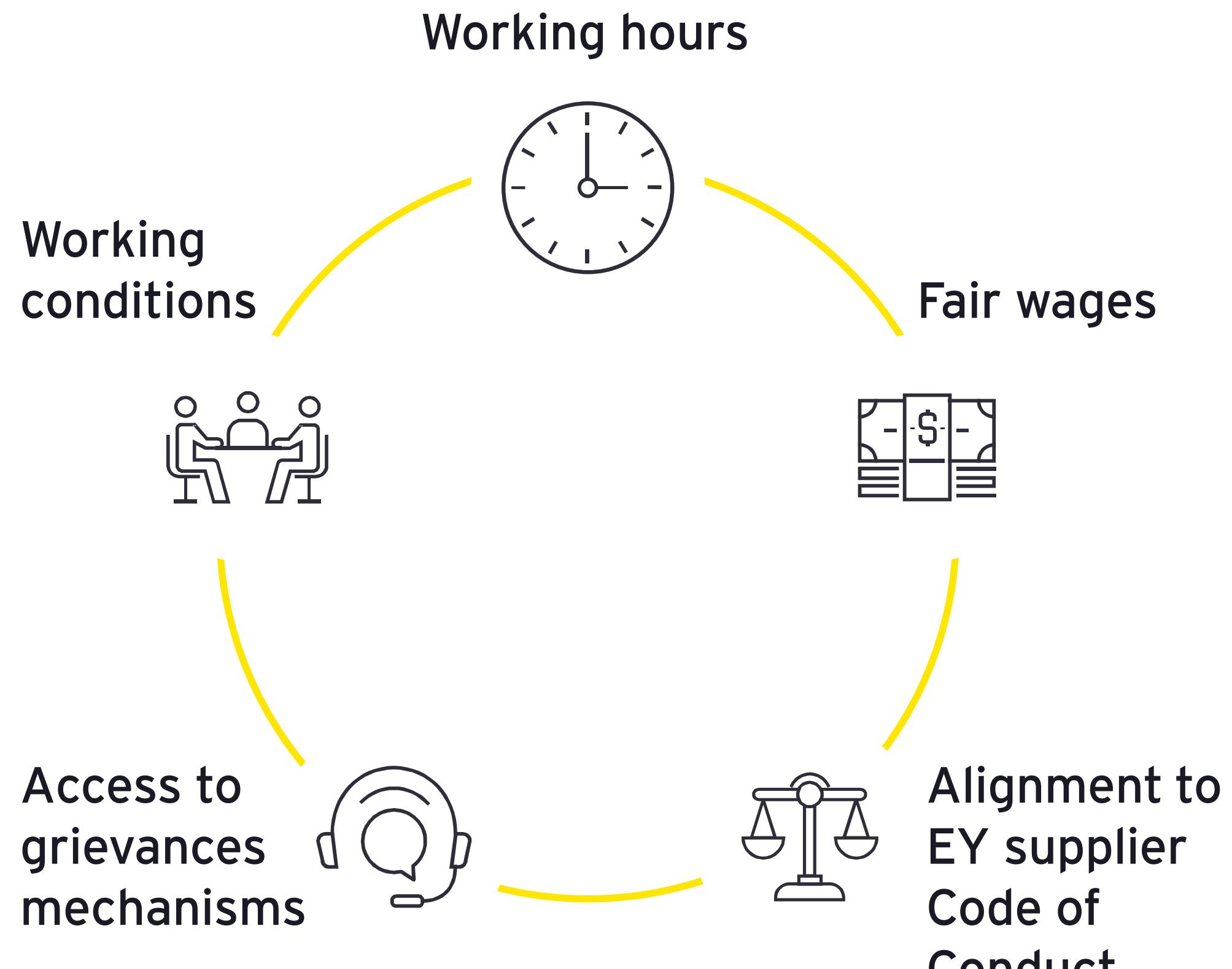
Priority procurement categories

Based on the risk and prioritisation assessment, our priority procurement categories for modern slavery risks remain consistent with previous years, being technology hardware, branded merchandise and stationery, onsite cleaning services and real estate. This assessment also informed our targeted due diligence activities during the reporting period.

Supplier due diligence activities

EY Australia takes a risk-based approach to managing modern slavery risks within our supply chain. By prioritising our efforts, we are aiming to reduce harm to people where it is most likely and severe. We also consider the causal relationship between our actions and potential impacts, which helps us to determine whether our actions might cause, contribute to, or be directly linked to modern slavery practices within our supply chain.

The goal of our due diligence activities is to gain a better understanding of the risk profile of our suppliers, and to assess the controls that our suppliers have in place to mitigate and manage modern slavery risks. We also seek to understand the impact of our demands on suppliers and the resulting effect on workers throughout our supply chain. The key indicators of modern slavery and broader labour rights risks that we assess through our due diligence activities include: working conditions, wages, working hours and access to grievance mechanisms. We also assess the supplier's alignment to the EY Supplier Code of Conduct.



Case studies

Key actions for FY24

In FY24, we initiated due diligence activities for our priority procurement categories for modern slavery risks: onsite cleaning services, branded merchandise and stationery, real estate and technology. This involved collaboration between the EY Australia modern slavery program team and relevant contacts across the EY Supply Chain Services function to understand and assess the risk profile of key suppliers. We sought to shift the focus of our supplier due diligence program away from a reliance on desktop-based supplier assessments to instead prioritise real engagement with impacted rightsholders through stakeholder interviews and site visits.

Cleaning service providers

We engaged with three of our largest cleaning service providers to gain a deeper understanding of how they mitigate modern slavery and broader labour rights risks. Initial activities included a self-assessment questionnaire, desktop assessment of relevant policies, procedures and documents, and interviews with management to discuss modern slavery risks and controls.

Following this initial engagement, we completed further due diligence for the cleaning provider for one of our office locations. This involved unmonitored interviews with individuals who provide cleaning services to the EY offices.

The assessment covered a range of labour-related topics including recruitment, terms of employment, working hours, grievances, remuneration, health and safety, entitlements and collective bargaining. We also toured on-site cleaning rooms to assess the equipment and facilities.

In FY25 we will conduct further due diligence activities for our cleaning providers in other locations.

Merchandise provider

We embedded modern slavery and human rights considerations in the tender process to select our new merchandise provider. This involved including detailed human rights and modern slavery considerations within tender documentation, evaluation of suppliers based on modern slavery risk factors and controls to shortlist suppliers, and modern slavery considerations in the selection criteria for the supplier. We also included additional modern slavery considerations within the supplier agreement taking into account the specific modern slavery risks associated with the tender.

Following the selection of the supplier, we initiated due diligence activities with key supplier personnel to gain a better understanding of the modern slavery risks and the activities to manage those risks. We also received supporting documentation to substantiate the controls and to obtain additional information about the risks within the supplier's value chain, including factory locations, social audits conducted by third parties, and details of any activities to trace materials back to their source.

We will build on this initial engagement during the FY25 reporting period and plan to complete an on-site assessment of a manufacturing facility providing EY goods.

Real Estate

We embedded modern slavery and human rights considerations into upcoming capital expenditure projects, including new office building projects and refurbishments of our current office spaces.

This involved including modern slavery and broader human rights requirements into tender documents to enable us to evaluate the risks and embed considerations in the design and construction phases of the projects. We also engaged with consultants, including nominated project managers, during the tender process to better understand the modern slavery and labour related risks associated with the project, the complexities of project structure and any relevant experience in including modern slavery controls in projects to mitigate risks on the project site and within the project supply chains.

We reviewed self-assessment questionnaires completed by all prospective consultants, including interior designers, quantity surveyors and structural engineers, among others, to assess their risk profile and alignment with our Supplier Code of Conduct.

Technology hardware provider

We re-initiated a human rights and modern slavery assessment for our primary technology hardware provider during the reporting period. This involved sending a bespoke self-assessment questionnaire to form a better understanding of their modern slavery and human rights risks and controls. We will use the responses to the questionnaire to help inform the key areas of risk across the supplier's operations and supply chain. In FY25, we will continue to engage with this technology provider to seek to prevent and mitigate any identified impacts.

We will also engage other key technology hardware providers in our supply chain to better understand the modern slavery and broader human rights risks, their response to managing those risks and alignment with the EY Supplier Code of Conduct.

Enhanced due diligence for higher risk and high spend global suppliers

In FY24, EY piloted enhanced ESG due diligence for a proportion of suppliers assessed as being in higher risk and/or high spend areas. The EY ESG Risk Assessment Tool was used to assess the ESG risk areas and risk levels of our suppliers. The listing of high-risk supplier types by product and service was used to shortlist a selection of global suppliers for the ESG assessment. Suppliers are required to respond to questions about their policies, programs and impacts across ESG, Human Rights and DE&I initiatives. Whilst a global review, EY Australia provided input into the modern slavery questions included in the ESG assessment and 8% of the suppliers selected for the assessment are direct EY Australia suppliers. During the reporting period, we also began a review of Higher Risk and/or High Spend global suppliers who completed a third-party EcoVadis accreditation. EcoVadis is a global platform that assesses companies based on their social and environmental impact. EY tracks changes in suppliers' EcoVadis scorecards

to better understand their standards across human rights and ESG. Those suppliers who achieve a lower EcoVadis score are engaged to discuss improvement areas and remediation measures and are monitored so that the required remediation actions are taken.

The review is ongoing and will be completed during FY25. Once assessed, suppliers will have their scores and any areas for improvement shared with them, including targeted and time bound remediation plans to be agreed and monitored by the EY organisation. We plan to further expand this assessment program during FY25.

Supply chain management

EY Australia considers the inherent modern slavery risk for all new suppliers during the supplier selection and onboarding process, assessed using the EY ESG Risk Tool. A centralised record is maintained by our procurement function of our supplier's inherent modern slavery risk ratings, including whether they have completed a modern slavery questionnaire as part of the onboarding process.

Priority suppliers

We complete targeted due diligence activities for selected priority suppliers.

Medium and high inherent risk suppliers

New suppliers assessed to have a medium or high inherent risk of modern slavery are required to respond to a questionnaire, which our modern slavery program team reviews to gain a deeper understanding of the supplier's risk profile and mitigation measures relevant to modern slavery, following up with suppliers for additional information as required or where a red flag for further enquiry is identified.

All suppliers

All suppliers must also agree to adhere to the EY Global Supplier Code of Conduct and all new supplier agreements (including contract renewals with existing suppliers) include a modern slavery provision, which sets out our modern slavery expectations and establishes our right to audit suppliers in relation to labour rights practices, including modern slavery.

Training

The modern slavery program team provided several awareness raising and capability building sessions for internal and external stakeholders during the reporting period. Annual training was delivered to all members of our procurement function who procure goods and services on behalf of EY Australia. This session was designed to develop participants' ability to identify and respond to key modern slavery and labour-related risks within the EY supply chain. A capability building session was also delivered to the Executive Leadership Team to build awareness and understanding of our risks and obligations relating to modern slavery and associated labour practices.

This year, we hosted two optional awareness raising, education sessions for suppliers. Those invited to attend included suppliers who fall into our priority procurement categories as well as suppliers identified to have a higher risk of modern slavery issues through supplier screening as part of the onboarding process. The education sessions for suppliers covered the following topics:

- The fundamental principles of human rights
- The role of business in relation to responsible business operations and the intersect with supply chains
- The EY position on human rights
- Our expectations of suppliers in relation to human rights
- How to manage and respond to human rights considerations

We also conducted a baseline survey of team members within our core business functions, including risk, legal, operations, finance, procurement and talent to better understand capabilities and knowledge relating to management of modern slavery risks. This will help to inform the content of future training programs conducted in FY25.

Grievance and remediation

The EY Ethics Hotline continues to be our established whistleblower and grievance mechanism, available to EY people, clients, suppliers and all other external stakeholders. The hotline is run by an external independent organisation to maintain confidentiality and to allow for reports to be raised anonymously. Our risk management team is responsible for overseeing the hotline and making sure that reports are investigated and responded to appropriately, led by the EY Regional Risk Management and Independence Leader, Oceania. The EY Ethics hotline is referenced in the EY Supplier Code of Conduct, supporting accessibility to the hotline by suppliers.

EY Australia also has other internal processes which employees can use to report an issue or to make a complaint, such as through our employee relations, legal or risk management teams. Employees can also engage our Welfare Contact Officers who play an important role in supporting our people who are experiencing behaviours that may infringe our Workplace Behaviour Policy, Global Code of Conduct or other EY policies.

As part of the culture review, the EY member firms in the Oceania region completed a comprehensive review of their policies and processes, and redesigned their internal complaints process. The revised policies, covering complaints handling, sexual harassment and other workplace behaviours, are now more accessible and easier to understand and apply. The policies provide clear guidance on how to navigate a workplace concern and how employees will be supported along the way. We also appointed Ombpoint as an independent ombudsman service, enabling people to seek confidential and independent guidance prior to raising a complaint. We are committed to encouraging all EY people to feel safe to raise a concern and can trust that their voice will be heard, respected and acted on.

During the reporting period, no reports of modern slavery practices, such as forced, bonded or child labour, or any other forms of modern slavery, were received by EY Australia.

The EY Australia process for responding to and remediating modern slavery incidents forms part of our complaints' investigation and escalation process, which was reviewed during the reporting period as part of culture review updates. Further to this, our Whistleblowing Policy sets out the principles for making, receiving, investigating and addressing reports. Our risk management team is responsible for investigating any reported modern slavery incidents and, in consultation with our modern slavery program team, determining the escalation steps required.

We also consult our Human Rights and Modern Slavery Working Group to improve oversight for modern slavery and broader labour rights issues. Our working group meetings and ongoing collaboration and consultation between the modern slavery program team and risk management team supported an increasing awareness of how modern slavery and human rights issues should be escalated throughout the business. We are committed to hearing, investigating and remediating all reports appropriately, as required.

Our clients

The EY organisation is a global leader in assurance, tax, transactions, and advisory services with experiences as a reporting entity and through our role assisting clients with modern slavery related services delivered by our Climate Change and Sustainability Services team. The Climate Change and Sustainability Services team help businesses to understand and respond to the risks and opportunities of sustainability related issues across their value chains, including human rights. Through the work of our global team of human rights practitioners, we are committed to contributing to the protection and promotion of human rights throughout supply chains. The Climate Change and Sustainability Services team has provided human rights advisory services to businesses for over 15 years, helping to create positive social impacts by developing tools to better tackle modern slavery risks and impacts.

We are continually learning about how we can improve the response to modern slavery, to drive action to identify and respond to modern slavery, and to create long-term value for clients, people and society.

We recognise that through the provision of our services, EY Australia may be directly linked to modern slavery impacts services if our clients are associated with modern slavery practices in their operations or supply chain. This risk is heightened in instances where we have lower visibility over the business model of a client. To manage these risks, in FY24, we included a modern slavery clause in the general terms and conditions for client engagements to strengthening our response to addressing modern slavery risk. In FY25, we will continue to seek to better understand how EY services, and the clients receiving them, interact with human rights and the public interest at an individual and systemic level.

06

Our approach to assessing
the effectiveness of our actions

06

Our approach to assessing the effectiveness of our actions

We are taking a monitoring and evaluation approach to effectiveness measurement

EY Australia developed an outcomes measurement approach in FY24 to monitor and evaluate the design and impact of our modern slavery program. The framework is designed to measure the impact that an initiative, program or organisation has on its stakeholders. It was born out of the recognition of a need to better understand whether our controls actually have an impact in identifying and reducing modern slavery and labour rights issues.

Measuring impact allows us to track the effectiveness of interventions in achieving underpinning aims. It also allows us to gain timely information on the effectiveness of our activities to inform decisions and allocate resources to maximise the impact of our program. By measuring impact, we can communicate and provide evidence on whether a difference is being made through our modern slavery program.

FY24 key measurement indicators

The effectiveness of our modern slavery program activities is assessed through measurement indicators. A key element of our approach is an internal reporting template to track performance against measurement indicators over time. During the year, we commenced the baseline data collection process for selected measurement indicators, and we will continue this in FY25 over a broader set of measurement indicators with the support of a broader network of business functions and stakeholders. Data collection in the reporting template will support disclosures related to our program effectiveness in future.

The table below outlines measurement indicators used to support our assessment of the program's effectiveness during the reporting period.

Pillar	FY24 key measurement indicator	Further information
Governance	Human Rights and Modern Slavery Working Group convened quarterly during the reporting period.	Page 13
Due diligence activities for operations	Progressed due diligence activities for our offshore member firm.	Page 23
Supply chain due diligence activities	Initiated due diligence activities over three of our largest cleaning service providers. Completed onsite due diligence for the cleaning provider for one of our office locations.	Page 26
	Participated in tender process for new primary merchandise provider.	Page 26
	Participated in tender process for upcoming capital expenditure works.	Page 27
	Initiated modern slavery and human rights assessment for largest technology hardware supplier.	Page 27
Grievance mechanism and remediation	No cases of modern slavery (actual or suspected) reported.	Page 30
Capacity building	Delivered annual training to Procurement Team. Conducted capability building session for Executive Leadership Team. Hosted two awareness raising sessions for suppliers.	Page 29
Client engagement acceptance procedures	Included modern slavery clause in template general terms and conditions for client engagements.	Page 31



Our actions
for the future



07 Our actions for the future

Our modern slavery program is ongoing, and we continue to complete due diligence activities and make progress in our review and enhancements, informed by our activities. Our priority actions for FY25 are set out in the following table. We will provide an update on our progress in relation to our actions in the next reporting period.

Pillar	Topic	Commitment
Governance	Tender and project documents	We will update tender and project documents and develop additional supporting materials to better manage modern slavery risks for suppliers with higher inherent risks.
	EY policies	We will review and update EY policies to strengthen our position on modern slavery
	Executive Leadership awareness and capability	We will continue to uplift the capability and awareness of the Executive Leadership team in relation to our risks and obligations relating to modern slavery and associated labour practices, as well as provide updates on the Modern Slavery Program.
Capability building	Supply Chain Services training	We will continue to conduct annual training with the Oceania Supply Chain Services Team.
	Capability building sessions with business functions	Conduct capability building sessions as required to support building knowledge of modern slavery within the business. Training may be delivered to the Executive Leadership Team as well as representatives from our core business functions, including risk, legal, operations, finance, procurement, talent and the sustainability office.
	Online modern slavery training module	Update online modern slavery training module and make available to all staff across the EY member firms in the Oceania region.
	Supplier webinars	Conduct webinars on modern slavery for EY suppliers, to build awareness of our minimum standards as set out in the EY Supplier Code of Conduct, and to increase capabilities to identify and address modern slavery risks.

Operational due diligence activities	Due diligence for offshore member firm and outsourced service providers	<p>Finalise findings and report following modern slavery and human rights assessment for the EY member firm in the Philippines and outsourced service provider in the Philippines. Commence due diligence activities over the EY member firm in India and other outsourced service providers.</p> <p>Work with the EY Global Internal Audit function to develop a program to assess human rights and modern slavery management practices of other EY member firms.</p>
Supply chain due diligence activities	Due diligence for supply chain	<p>Continue to complete targeted due diligence activities for selected priority suppliers, including technology, hospitality, cleaning, merchandise and real estate suppliers. The key activities for suppliers will be determined based on risk and may include:</p> <ul style="list-style-type: none"> ▪ Review of documents and records ▪ Engagement with key personnel from management ▪ Direct, unmonitored engagement with impacted stakeholders ▪ Site assessment of working conditions ▪ Corrective action plans
Assessing effectiveness	Monitoring and evaluation	Continue to implement our monitoring and evaluation approach to better assess the design and operational effectiveness of the modern slavery program to achieve overarching objectives and to protect and promote decent work and to contribute to the eradication of modern slavery.
	Oceania Modern Slavery Compliance Program	Update the Oceania Modern Slavery Compliance program to support our monitoring and evaluation approach
Grievance mechanism and remediation	Grievance mechanism	Continue to work with risk management and the culture review team to enhance how human rights and modern slavery complaints are categorised and recorded so that EY Australia maintains an active view for the types of issues, including any key trends, relating to labour rights issues to enable continual program enhancements.

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