



DT Global

DT Global Australia Holdings Pty Ltd

Modern Slavery Act Statement

1 Introduction and Reporting Entities

1.1 Entity structure

This Modern Slavery Statement is prepared and submitted by DT Global Australia Holdings Pty Ltd (ACN 660 152 858).

DT Global Australia Holdings Pty Ltd (ACN 660 152 858) was established in June 2022 and is a subsidiary of the ultimate controlling entity DT Global LP, a Bermuda limited partnership with the majority owned by GPD Charitable Trust. The broader DT Global group is referred to hereafter as 'DT Global'.

DT Global Australia Pty Ltd (ACN 633 607 468) and DT Global Asia Pacific Pty Ltd (ACN 006 170 869), formerly Cardno Emerging Markets (Australia) Pty Ltd, are both wholly owned subsidiaries of DT Global Australia Holdings Pty Ltd (herein collectively referred to as "DT Global APAC").

The acquisition of Cardno Emerging Markets (Australia) Pty Ltd, now DT Global Asia Pacific, in June 2022 by DT Global Australia Holdings Pty Ltd increased the company's annual consolidated revenue to more than A\$100 million. Prior to the acquisition, DT Global Australia Pty Ltd did not meet the mandatory reporting threshold under Australia's *Modern Slavery Act*, and the former Cardno entity reported as part of the broader Cardno group.

Since the acquisition, DT Global APAC has been through a significant process of consolidating and strengthening of our policy frameworks and approaches, including those specific to safeguarding and modern slavery. This statement captures the actions that DT Global APAC has taken to assess and address modern slavery risks in our operations and supply chains, and our plans for strengthening and improvements to those frameworks in the next reporting phase.

1.2 About DT Global APAC

DT Global APAC delivers international development services globally, working in partnership with communities, governments, and the private sector to deliver innovative solutions that transform lives and address the world's greatest challenges.

From early-stage crisis and stabilisation assistance through to economic development, governance, and environmental work, DT Global APAC works to positively impact lives across sectors. We work across a range of principal development areas including:

- Economic growth
- Environment and infrastructure
- Governance
- Human development.

Our global team of more than 2,000 staff and experts work in over 30 countries to solve complex problems, having done so for more than 60 years.

DT Global has corporate offices in Africa, Australia, Europe, United Kingdom, Kenya and the United States, and our global portfolio spans more than 90 countries. We also have many regional satellite offices around the world including: Indonesia (Jakarta), Papua New Guinea (Port Moresby), Philippines (Manila), Poland, Turkey, Nepal (Kathmandu), Fiji (Suva), Australia (Canberra, Brisbane, Adelaide, Melbourne), Bangladesh, Belgium (Brussels), New Zealand (Auckland), and South Africa (Johannesburg).

Our clientele in the Asia Pacific region includes the Australian Government Department of Foreign Affairs and Trade, New Zealand Ministry of Foreign Affairs and Trade, Asian Development Bank, World Bank, and the Millenium Challenge Corporation.

2 Modern Slavery Risks in our Operations and Supply Chains

Reflective of the recent significant changes to our organisation, DT Global APAC is in the process of reviewing and consolidating our policy frameworks and approaches to assessing and addressing modern slavery risks in our operations and supply chains.

We recognise that in the geographies that we operate in, human trafficking and modern slavery remain a significant problem, with an estimated 29 million people as victims of forced labour in Asia Pacific, accounting for well over half of the global estimated number of victims.¹

DT Global APAC is focused on reducing the risk of directly or indirectly engaging in slavery or human trafficking by further interrogating and understanding areas of higher risk; ensuring that we improve transparency across our supply chains; expanding our robust supplier due diligence program; and training our personnel and suppliers on modern slavery risks.

2.1 Foundational risk assessment: Modern Slavery Assessment and Issues Review (2020)

DT Global APAC is currently building on foundational, independent analysis undertaken in 2020, prior to the acquisition of Cardno Emerging Markets (Australia) Pty Ltd by DT Global APAC.

At the time, an external ‘Modern Slavery Assessment and Issues Review’ was commissioned by Cardno to identify and better understand modern slavery risks associated with its business, with a focus on Cardno Emerging Markets (Australia) Pty Ltd (now DT Global Asia Pacific Pty Ltd).

This review, undertaken by an independent firm, aimed to determine the maturity of the business’ approach to managing modern slavery risks across its operations and supply chain. It identified strengths and gaps and provided recommendations for how to identify and manage modern slavery risks and adopt more consistent modern slavery prevention processes.

The independent review identified that, based on an evaluation of overall modern slavery risk factors potentially present in operations and supply chains, the Cardno Emerging Markets (Australia) Pty Ltd business (now DT Global Asia Pacific Pty Ltd) presented higher modern slavery risk, largely because the business engages services reliant on a proportion of labour-intensive, low-skill workers in high-risk geographies.

Noting that ex-Cardno Emerging Markets (Australia) Pty Ltd programs and activities now make up the majority of DT Global APAC’s current portfolio of operations in the Asia Pacific region, the modern slavery risks identified in the third-party review remain relevant and are thus detailed below.

¹ <https://www.walkfree.org/global-slavery-index/findings/regional-findings/asia-and-the-pacific/>

2.2 Commentary on risk profile

Commentary of the modern slavery risk profile was provided by the independent review:

- DT Global APAC has a higher risk of contributing to modern slavery practice through third-party service providers such as cleaning, hotels, hospitality, transport, and security. This is based on our material spend in higher risk geographies.
- DT Global APAC has a lower risk of engaging in modern slavery through our direct employment practices and when engaging organisations under contracts or grants. We have a high level of visibility of employment conditions and this is the majority of our operations.
- The entity risk for DT Global APAC is low as DT Global APAC maintains operational control of its entities.

2.3 Specific modern slavery risk areas

The independent review provided feedback across the following five modern slavery risk areas, as indicated below:

Employment (low risk)

The majority of DT Global APAC's workforce is employed directly by our entities on permanent or fixed-term contracts. In some instances, third-party providers are used to engage staff to ensure compliance with local labour, tax, and social benefit obligations. In these instances, DT Global APAC retains visibility and exercises influence and in some cases control over employment conditions of staff and implements strong human resources procedures such as wage reviews, leave allowances, and health and wellness benefits.

Risks remain in our engagement with contracted organisations and suppliers where we have less direct visibility of employment terms.

Direct contracts and grants (lower risk)

DT Global APAC typically engages professional services, Non-Governmental Organisations, and universities in our work. These commercial relationships are through direct contracts or grants ('Tier One') and the nature of the work is to provide highly skilled advisory services or technical assistance. Grants may also be used to support organisational capacity building for local organisations to assist them to meet various compliance requirements, including modern slavery obligations.

This risk is generally lower as DT Global APAC has visibility of the organisation, direct oversight of the work and funding, conducts comprehensive due diligence, conducts onboarding training, and maintains the right to audit as part of an ongoing audit risk management program. However, while lower risk, direct contractors and grantees may subcontract some of their services or activities to downstream partners. DT Global APAC contract and grant agreements require cascading of compliance requirements onto downstream partners, backed up by audit provisions, and require subcontractors to seek formal approval prior to further subcontracting to downstream partners.

Third party services (higher risk)

In order to conduct our international business activities, DT Global APAC engages services that rely on a proportion of labour intensive, low-skilled workers including hotels, hospitality, security, cleaning, and transportation in higher risk geographies. Workers in these services often migrate for work and may be engaged via labour hire or third-party arrangements.

DT Global APAC has limited visibility of working conditions and limited leverage to influence labour hire practices, thus there is a higher risk of contributing to modern slavery practices through third-party service providers.

Tier Two suppliers and beyond (medium risk)

Modern slavery risk increases when engaging multiple organisations who rely on tier two and tier three suppliers to provide labour, supplies, and equipment. For DT Global APAC, this is primarily in construction-related activities, but can also include any large-scale procurement or grant funds disbursement.

DT Global APAC has limited visibility of sub-contractors' suppliers and, therefore, there is a risk of being directly linked to modern slavery practices when undertaking construction or similar activities.

Sector level activities (higher risk)

DT Global APAC provides resources under client contracts to support sector-level activities that are considered high risk. This may include tourism; agriculture and fisheries; construction; extractives; and market systems that work in higher risk geographies. It may also include work directly with farmers, wholesalers, local business support, or work that directly benefits children, also in high-risk geographies.

We recognise that because of the nature of our operations, there is additional analysis required to understand **geographic risks**, noting that many of the countries that we work in have higher risks of modern slavery for a range of reasons, including weak governance structures, conflict, migration flows and socio-economic factors. This will be the focus of our risk identification and assessment processes for the coming reporting period.

3 Actions Taken to Assess and Address Modern Slavery Risks

At DT Global APAC, modern slavery falls within the broader focus area of safeguarding. For DT Global APAC, 'safeguarding' means protecting the health, well-being, human rights and natural environment of people and communities that we engage with through our programs and corporate operations, with a particular focus on safeguarding women, children, and vulnerable adults, who can disproportionately bear the negative impacts of international development programs.

Women, children, and vulnerable people are also those who are disproportionately impacted by modern slavery and human trafficking.

DT Global APAC is continuously assessing and strengthening our approach to safeguarding, including actions focused specifically on managing the risk of modern slavery in our business.

Our key areas of focus at present include policy framework; procurement due diligence; training and awareness-raising.

3.1 Policy framework

DT Global APAC is committed to the elimination of all forms of slavery within our operations and supply chains, and this commitment is reflected in our policy framework which supports governance and implementation of our modern slavery efforts.

Our global policies are supplemented by geography-specific policies and procedures relevant to each business context and risk profile, all of which are centrally available and accessible by personnel and communicated clearly with suppliers and other key stakeholders.

The full list of safeguarding policies, procedures and tools for supplier engagement are outlined below.

Global policy or procedure	Asia Pacific policy, procedure or tool
Code of Business Ethics and Conduct	Safeguards Policy
Anti-Human Trafficking and Modern Slavery Policy	Anti-Slavery and Trafficking Procedure
Child Protection Policy	Child Protection Procedure
	Child Protection Code of Conduct
PSEAH Policy	Preventing Sexual Exploitation, Abuse and Harassment Procedure

Global policy or procedure	Asia Pacific policy, procedure or tool
Fraud Policy	Fraud Control and Anti-Corruption Procedure
Anti-Corruption Policy	
Procurement Policy	Procurement Toolkit
	Grants Manual
	Subcontractor and Grantee Compliance and Performance Management Procedure
	Due Diligence Guidance Note
	Due Diligence Assessment for Partner Organisations
	Blocked Parties Screening Policy
	CSI Watchdog Elite (Third Party Screening Tool)
	Whistleblower Policy
	Independent Whistleblower / Speak Up Platform administered by Core Integrity
	'Compliance Pack' for suppliers
	Quality Policy
	Internal Quality Audit Procedure
	Internal Audit Checklists

3.2 Procurement due diligence

DT Global APAC is focused on meaningful, transparent engagement with our suppliers so that we can work with and through them to prevent modern slavery.

We have a well-established and systemised process to engaging with Tier One suppliers from procurement and grant making approach to market, through to contracting and onboarding, including the following key components:

- **Procurement/grant approaches and supplier / grantee identification:** DT Global APAC's Procurement Toolkit, Grants Manual, and Subcontractor and Grantee Compliance and Performance Management Procedure – foundational documents which guide and drive the entire procurement and grant making process – reference modern slavery risks throughout and provide clear guidance to DT Global APAC personnel on engagement and management of suppliers and grantees. All tender and grant making documentation reference DT Global APAC's safeguarding requirements, as does our Due Diligence Preliminary Supplier Statement, which is provided to potential suppliers and grantees during the approach to market stage.
- **Due Diligence:** Prior to contracting suppliers and grantees, a formal Due Diligence Assessment is undertaken, which is intended not to preclude suppliers; rather to identify gaps in a supplier's ability to meet policy requirements including those relating to slavery risk. The Due Diligence Assessment for Partner Organisations asks questions specific to the suppliers' processes to address and manage modern slavery risks within their supply chains.
- **Risk assessment:** DT Global APAC projects are required to undertake risk assessments at initial startup and throughout implementation. Risk assessments are conducted across a range of safeguarding areas, with assessments also assessing project interactions with vulnerable people who may be at high risk of modern slavery. Suppliers are also required to conduct safeguarding, fraud, and corruption risk assessments upon entering into contracts with DT Global APAC.
- **Contract clauses:** All DT Global APAC contract templates include safeguarding clauses – including explicit reference to modern slavery – in addition to inherent requirements regarding supplier/grantee induction; disclosures and reporting; due diligence; interlinkages with fraud and bribery; and warranties.
- **Supplier Induction:** Supplier inductions are required prior to commencing work with DT Global APAC, utilising a standard 'Compliance Pack' to ensure consistency of information shared. The Compliance Pack covers content on DT Global APAC's mandatory compliance and contract requirements, including safeguards, slavery, and risk management.

- **Auditing:** Our internal audit program adopts a sample-based assurance methodology to monitor that due diligence practices are followed. Audits are conducted and reported at least annually as part of management review and under third party ISO9001:2015 certification. Internal audit checklists include specific questions on supplier / grantee compliance and management and safeguarding issues.

3.3 Training

DT Global APAC has access to a mandatory, online modern slavery training module which is completed by all DT Global APAC personnel as part of their induction, via our DT Global APAC Learning Managing Platform.

This training covers introductory content on the scope and scale of the issue of modern slavery; the different types of modern slavery; potential signs of modern slavery; how to respond if modern slavery is detected; potential risks within our business; and relevant legislation.

3.4 Modern slavery awareness

We recognise that as a business, we have a role to play in respecting fundamental human rights and amplifying efforts to eliminate modern slavery.

DT Global is a signatory to the United Nations Global Compact (UNGC) and supports the Ten Principles of the UNGC on Principles on human rights; labour; environment and anti-corruption, including the elimination of all forms of forced and compulsory labour (principle 4), and the effective abolition of child labour (principle 5).

We are also an active participant in the UN Global Compact Network Australia's Modern Slavery Community of Practice for business members.

4 Measuring Effectiveness

DT Global APAC has recently introduced systems and tools to measure the effectiveness of actions taken to combat modern slavery using the following key metrics:

- Percentage of Tier one suppliers that have completed DT Global APAC's formal due diligence process and signed on to our contract terms – including safeguarding requirements specific to modern slavery.
- Percentage of DT Global APAC personnel that have completed their modern slavery training on the DT Global Learning Management System.
- Percentage of contracts signed with suppliers which include clauses specific to modern slavery.

As DT Global APAC further strengthens our approaches to addressing modern slavery, we will add other indicators to this list so that we are able to better measure the effectiveness of our actions.

5 Looking Forward

We recognise that although we have some excellent foundational tools and approaches in place, there are gaps that we need to address to further strengthen our modern slavery awareness, risk identification, and prevention.

As such, over the course of the next reporting period, DT Global APAC will be seeking both external support and internal buy-in to undertake the following key tasks:

- Review DT Global APAC's modern slavery training package with an aim to update and improve the content.
- Further explore an online Third-Party Risk Management System, leveraging technology to reliably and consistently conduct due diligence, onboard third parties and manage third party risks (including screening against modern slavery, labour, human rights, child protection and safeguards assessments and risks) – which will further improve our already robust due diligence process and engagement with suppliers.

- Building on the independent review already in hand, contract independent support to undertake a more robust supplier mapping, including to identify Tier one suppliers and more fully map supply chains.
- Review our Anti-Slavery and Trafficking Procedure and associated training resources.

6 Consultation and Statement Approval

This statement has been compiled and reflects consultation and collaboration with representatives of DT Global Australia Holdings Pty Ltd and its subsidiary entities.

Prior to review and approval below, this statement was also considered and reviewed by DT Global APAC's Head of Operations, Legal Counsel and Managing Director.

This statement was reviewed and approved by the office holders of DT Global Australia Holdings Pty Ltd and its wholly owned subsidiary entities DT Global Australia Pty Ltd and DT Global Asia Pacific Pty Ltd. The office holders are Frank Maiolo as Director, Grant Wilson as Company Secretary and Craig Bosanko as Alternate Company Secretary.



Frank Maiolo
Director, DT Global Australia Holdings Pty Ltd
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