

PwC Australia

Joint Modern Slavery Statement

FY2023

This is a Joint Modern Slavery Statement prepared by PwC Australia and associated reporting entities in accordance with s16 of the *Modern Slavery Act 2018* (Cth).



Acknowledgement of Country

We acknowledge and pay our respects to Aboriginal and Torres Strait Islander peoples as the First Peoples of this nation, upon whose ancestral lands and waters we work and live throughout what is now known as Australia.

We honour the wisdom of, and pay respect to, Elders past and present.

We give thanks to the Traditional Custodians, Elders and their Ancestors who have nurtured Country since time immemorial. We acknowledge their continued strong spiritual and cultural connections to Country and we are grateful for the relationships we have made with communities and Nations upon whose Land our offices reside; Kurna Country in Tarndanya (Adelaide), Turrbal and Jagera Country in Meanjin (Brisbane), Larrakia Country in Garramilla (Darwin), Ngunnawal and Ngambri Country in Canberra, Wurundjeri Country in Naarm (Melbourne), Awabakal Country in Mulubinba (Newcastle), Whadjuk Noongar Country in Boorloo (Perth), Gadigal Country in Sydney and Dharug Country in Parramatta.

We also acknowledge the historical lived experience of First Nations peoples who have endured injustices and various forms of slavery in this country. This part of our shared history has impacted generations of First Nations peoples and remains an area of unfinished business, and presents an opportunity for our nation to undertake a process of truth telling.





A message from PwC Australia's CEO on behalf of the PwC reporting entities

As part of PwC's purpose to build trust in society and solve important problems, we are focused on addressing modern slavery risks in our operations and supply chain.

This Joint Modern Slavery Statement has been approved by the Governance Board of PricewaterhouseCoopers and the Boards of PricewaterhouseCoopers Services Pty Ltd (the trustee for PricewaterhouseCoopers Services Trust), PricewaterhouseCoopers Securities Ltd, PricewaterhouseCoopers ASEANZ Consulting Pty Limited and Scyne Advisory Pty Ltd (previously PricewaterhouseCoopers Consulting (Australia) Pty Limited)*.

* On 8 November 2023, Scyne Advisory Pty Ltd (previously PricewaterhouseCoopers Consulting (Australia) Pty Limited) was sold to Australian private equity firm Allegro Funds. However, given that Scyne Advisory Pty Ltd was wholly owned by PricewaterhouseCoopers ASEANZ Consulting Pty Limited for the full financial year ended 30 June 2023, it has been included as a reporting entity in this Statement. The governing bodies of Scyne Advisory Pty Ltd have approved this Statement as at 7 November 2023, as noted above, and the newly formed Board of Scyne Advisory Pty Ltd has approved the inclusion of this entity in this Statement for the purposes of the *Modern Slavery Act 2018* (Cth).

As a business, we have an important role to play in addressing human rights issues including modern slavery. That is why, in FY23, we released our first sustainable procurement strategy and introduced new responsible supply terms with respect to contingent workers. Additionally, we expanded our supplier screening, improved our due diligence process and developed a supply chain remediation strategy.

These positive developments came amidst a challenging year for our firm and our people, where we embarked on a process of fundamental change following failures of governance, culture and accountability. My priority is to oversee the changes required to re-earn the trust of our stakeholders and the broader community and restore our business performance. To achieve this, we will continue to encourage our people to think deeply about solutions to societal issues that are important to our clients and our communities.

We are committed to learning, changing, and leading. This is our promise to our people, our partners, our clients and our communities. Whether this is in the way we conduct ourselves, the impact we have on rights-holders, or the way we screen our clients and suppliers, we should always strive to do better.

Consistent with our firm's renewed focus on ethical business conduct we will continue to assess the effectiveness of our actions to address modern slavery in our operations and relationships. We will also observe with interest any outcomes from the statutory review of the Modern Slavery Act.

I am pleased to introduce our FY23 Joint Modern Slavery Statement that outlines how PwC Australia and its reporting entities identified and addressed modern slavery risks in the financial year ended 30 June 2023 (FY23).



Kevin Burrowes

CEO • Country Senior Partner • Member of PwC Australia's Management Leadership Team
Signing on behalf of all reporting entities

PricewaterhouseCoopers
(ABN 52 780 433 757)

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Timing of this Statement

The publication of our FY23 Joint Modern Slavery Statement (the **Statement**) follows the release of Dr Ziggy Switkowski AO's Independent Review into our governance, culture and accountability. The Review and our Management Response were published in full on 27 September 2023 and are available on our [website](#).

About this Statement

Reporting Entity

PricewaterhouseCoopers (ABN 52 780 433 757) has prepared this Statement in accordance with sections 14 and 16 of the *Modern Slavery Act 2018* (Cth) (the Act). The Statement applies to the following PwC reporting entities (reporting entities) each with a Registered Office of One International Towers Sydney, Level 17, 100 Barangaroo Avenue, Barangaroo NSW 2000 Australia:

1. PricewaterhouseCoopers (ABN 52 780 433 757)
2. PricewaterhouseCoopers Services Trust (ABN 52 864 604 756) – its trustee is PricewaterhouseCoopers Services Pty Ltd (ABN 59 082 982 554)
3. PricewaterhouseCoopers Securities Ltd (ABN 54 003 311 617)
4. PricewaterhouseCoopers ASEANZ Consulting Pty Limited (ABN 77 606 603 436)

Mandatory Criteria

This Statement was prepared to meet the mandatory criteria of the Act and describe how we have assessed and addressed modern slavery risks in our operations and supply chain for the financial year ended 30 June 2023 (FY23). We apply the Act's definition of modern slavery¹ which is conduct that includes offences in slavery, servitude, forced labour, deceptive recruiting for labour or services, forced marriage, debt bondage, trafficking in persons or the worst forms of child labour.

Modern Slavery Act Mandatory Criteria	FY23 Joint Modern Slavery Statement	Page
1 Identify the reporting entity	<ul style="list-style-type: none"> • Reporting entities 	4
2 Describe the reporting entity's structure, operations and supply chains	<ul style="list-style-type: none"> • Our structure, operations and supply chains • How and where we operate • Goods and services we buy 	6
3 Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities it owns or controls	<ul style="list-style-type: none"> • Our actions 	12
4 Describe the actions taken by the reporting entity, and any entities it owns or controls, to assess and address these risks, including due diligence and remediation processes	<ul style="list-style-type: none"> • Our actions 	10
5 Describe how the reporting entity assesses the effectiveness of these actions	<ul style="list-style-type: none"> • Assessing the effectiveness of our actions 	20
6 Describe the process of consultation with any entities the reporting entity owns or controls	<ul style="list-style-type: none"> • Our consultation and collaboration 	21
7 Provide any other relevant information	<ul style="list-style-type: none"> • A message from PwC Australia's CEO • Our actions framework and progress since FY22 • Future state 	3 5 22

¹ Modern Slavery Act 2018 (Cth) s4 (definition of 'modern slavery').

5. Scyne Advisory Pty Ltd (previously PricewaterhouseCoopers Consulting (Australia) Pty Limited) (ABN 20 607 773 295)*

A reference to PwC or we or us or our is a reference to the above reporting entities collectively or individually as the context requires. A brief description of the relationship between these entities, some of their controlled entities, and the PwC network is set out in the section Our structure, operations and supply chains on [page 6](#).

For any references to an entity having 'control' of another entity, the term 'control' has the meaning given in the Act.

* On 8 November 2023, Scyne Advisory Pty Ltd (previously PricewaterhouseCoopers Consulting (Australia) Pty Limited) was sold to Australian private equity firm Allegro Funds. However, given that Scyne Advisory Pty Ltd was wholly owned by PricewaterhouseCoopers ASEANZ Consulting Pty Limited for the full financial year ended 30 June 2023, it has been included as a reporting entity in this Statement.

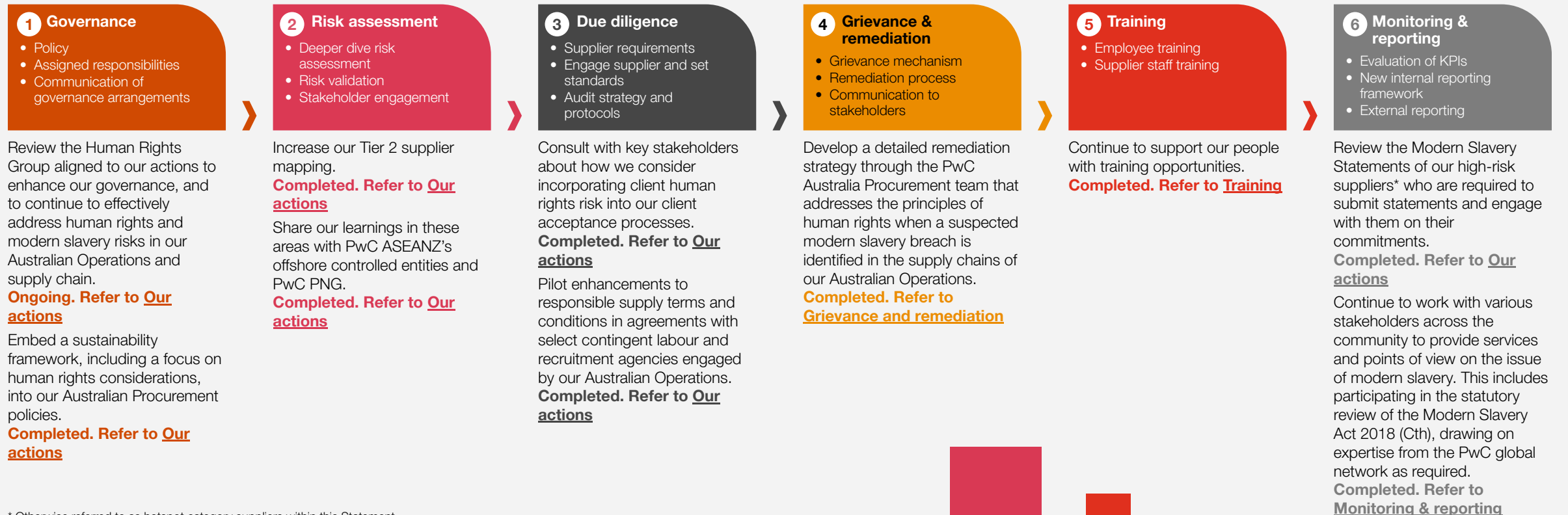
Update: Our actions framework and progress since FY22

Over the last four years, we have monitored progress against our actions framework (for assessing and addressing modern slavery risks in our Australian Operations) and applied a continuous improvement focus to our approach. We have also shared this framework with our offshore controlled entities and encouraged them to adopt it in their operations and supply chains as appropriate within the context of their own regulatory obligations.

Below in Figure 1 is a progress update of the “future focus areas” that were outlined in our FY22 Modern Slavery Statement. While selected actions have been marked as completed, we will build on these as part of our ongoing commitment to continuous improvement.

Figure 1: Progress on our FY22 future focus areas

PwC Australia’s action framework to address modern slavery risks



* Otherwise referred to as hotspot category suppliers within this Statement.

Our structure, operations and supply chains

PwC at a glance

At PwC, we deliver integrated solutions across professional services, including audit, assurance, consulting, and tax services. We are committed to diversity, inclusion, wellbeing and social impact as well as empowering our people in upskilling, flexible working and pursuing their passions.

For more information about PwC Australia, our operations and our sustainability performance, see our firmwide FY23 [Transparency Report](#).

We are part of the global PwC network, which operates across 151 countries and consists of professional services firms that are separate legal entities operating under the PwC brand. All PwC network firms are members of PricewaterhouseCoopers International Limited (**PwCIL**) and must comply with global network regulations and certain common policies, including the PwC network Code of Conduct and Third Party Code of Conduct (**TPCOC**). For more information about the PwC network, see www.pwc.com/structure and our [Global Annual Review](#).

Our structure

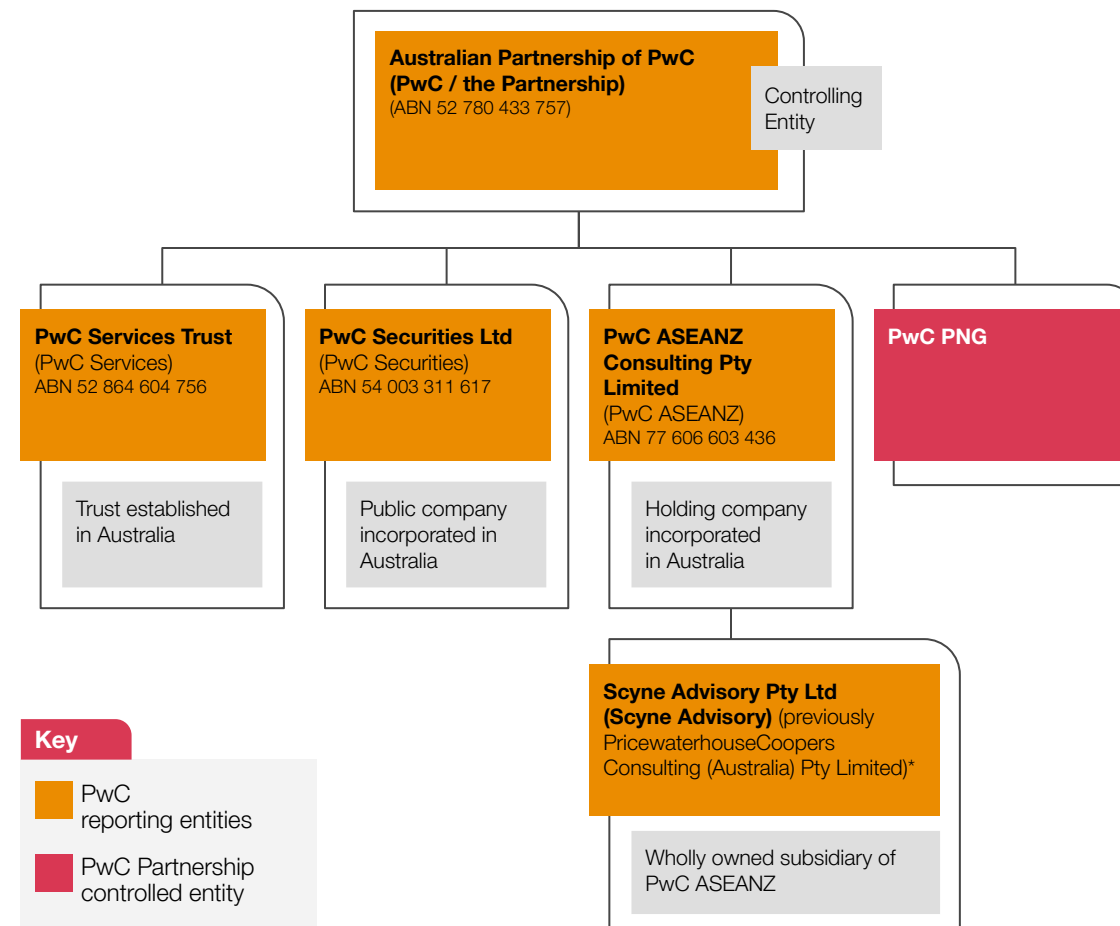
The PricewaterhouseCoopers partnership in Australia (the **Partnership**) is the controlling entity of a number of entities. These include the PricewaterhouseCoopers Services Trust (**PwC Services**), a trust established in Australia and its trustee, PricewaterhouseCoopers Services Pty Ltd, a company incorporated in Australia and PricewaterhouseCoopers Securities Ltd (**PwC Securities**), a public company incorporated in Australia (together **PwC Australia**).

The Partnership is also the ultimate beneficial owner of a majority of the shares in PricewaterhouseCoopers ASEANZ Consulting Pty Limited (**PwC ASEANZ**), a holding company incorporated in Australia. PwC ASEANZ acquired the Australian consulting business from the Partnership, the local consulting business from the existing PwC network firm in New Zealand, and the regional holding company of the PwC network consulting businesses in a number of other countries in South-East Asia. In FY23, the majority of the Australian consulting business was operated by Scyne Advisory Pty Ltd (**Scyne Advisory**) (previously PricewaterhouseCoopers Consulting (Australia) Pty Limited), a company incorporated in Australia, which is a wholly owned subsidiary of PwC ASEANZ.

The Partnership has a financial interest in, and control of, the PwC network firm in Papua New Guinea (**PwC PNG**).

The Partnership also holds non-controlling interests in other entities based in Australia and overseas, including in the Philippines and India. The overseas entities, co-owned with other PwC network firms, include entities that are intended to provide regional governance, services and/or other assistance to PwC network firms. In Australia, the Partnership also holds a non-controlling interest in PricewaterhouseCoopers Indigenous Consulting Pty Limited, a majority Indigenous owned, led and staffed consulting firm. These non-controlling entities are not reporting entities for the purposes of this Statement.

Figure 2: Reporting Entities for the purposes of this Act (as at 30 June 2023)



* On 8 November 2023, Scyne Advisory Pty Ltd (previously PricewaterhouseCoopers Consulting (Australia) Pty Limited) was sold to Australian private equity firm Allegro Funds.

For the purposes of this Statement

- PwC Australia means, together, the Partnership, PwC Services and PwC Securities.
- Australian Operations means, together, the operations of PwC Australia and the Partnership's other controlled entities in Australia, and the Australian operations of PwC ASEANZ.
- PwC ASEANZ's offshore controlled entities means entities controlled by PwC ASEANZ that operate outside of Australia including in Indonesia, Malaysia, Myanmar, New Zealand, Philippines, Singapore, Thailand and Vietnam.
- PwC's offshore controlled entities means entities controlled by PwC Australia and PwC ASEANZ, respectively, that operate outside of Australia.

Our operations: workforce

In FY23, our Australian Operations included a workforce of more than 10,000 partners and employees in Australia with offices in Adelaide, Brisbane, Canberra, Greater Western Sydney, Melbourne, Newcastle, Perth and Sydney.

Our workforce has expertise in industries including financial services, energy and mining, consumer and retail, healthcare, and infrastructure. PwC Australia's operations include a number of enabling functions such as strategy and transformation, risk and ethics, central facilities, finance, technology, human resources, procurement and corporate sustainability teams which support PwC Australia's Australian businesses as well as the Australian consulting business of PwC ASEANZ.

PwC ASEANZ's operations outside of Australia include a workforce of more than 1,900 partners and staff directly employed by PwC ASEANZ's offshore controlled entities across Indonesia, Malaysia, Myanmar, New Zealand, Philippines, Singapore, Thailand and Vietnam. PwC ASEANZ's offshore controlled entities are supported by the separately owned PwC network firms in Indonesia, Malaysia, New Zealand, Philippines, Singapore, Thailand and Vietnam (each an **Offshore Local Firm**). In addition to being subject to PwC network regulations and policies, PwC ASEANZ's offshore controlled entities are also required to operate in accordance with the laws of the countries in which they are based as well as the policies and processes of their Offshore Local Firms.

PwC PNG is a separate legal entity with its own local management team. As a member of the PwC network, PwC PNG is required to comply with network regulations and policies.

Our supply chain

In FY23, our Australian Operations sourced goods and services from over 2,000 tier-one suppliers. 1,893 tier-one suppliers operate in Australia.

We also purchased from overseas suppliers, mainly in the United States and the United Kingdom, and engaged the services of other PwC network firms. PwC's offshore controlled entities sourced goods and services from a range of suppliers, including the Offshore Local Firms and other PwC network firms.

What we buy:

- Office facilities management, including catering
- Professional services
- Information and research services
- Utilities
- Marketing and events
- Office services and products
- Technology services and products
- Travel services and products.

The location of tier-one, and some tier-two and tier-three suppliers to our Australian Operations in FY23. Refer to [page 14](#) for the definition of supplier tiers.

Key

- T1 suppliers
- T2 suppliers
- ▲ T3 suppliers

Notes

- Excludes other PwC network firms who are suppliers to our Australian Operations.
- Includes tier-two and tier-three suppliers we identified in our Australian Operations supply chain during FY23, but does not reflect the total number of tier-two and tier-three suppliers.
- We acknowledge that Australian based suppliers may source from overseas.



Towards a sustainable supply chain

The Global Slavery Index² report has shown increased numbers of people living in modern slavery since 2018, accompanied by rising and more complex conflicts, climate-induced migration, and economic and social impacts of the COVID-19 pandemic, amongst other global changes. At PwC Australia, we remain committed to enhancing our actions that create a more ethical, resilient and sustainable supply chain.

In FY23, we released our first Sustainable Procurement Strategy, which was prepared by the Procurement team in consultation with the Corporate Sustainability team and Human Rights Group. The Strategy focuses on a range of aspects related to sustainable performance, including the future focus areas drawn from the [FY22 Joint Modern Slavery Statement](#). We also appointed our first Sustainable Procurement Senior Manager within the Procurement team to lead this strategy.

² Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation. <https://walkfree.org/global-slavery-index/>.

Locations with 5 or more tier-one suppliers

Australia	
T1 Suppliers	1893
% Total spend	85.4%
T2 Suppliers*	429
T3 Suppliers*	27
Business Expenses	
Facilities	
Financial Services	
Human Capital Services	
Information Services	
Information Technology	
Marketing & Events	
Office Services	
Professional Services	
Staff Expenses	
Travel	
Modern slavery prevalence ^	1.6

Singapore	
T1 Suppliers	9
% Total spend	<1%
T2 Suppliers*	6
Business Expenses	
Human Capital Services	
Information Technology	
Marketing & Events	
Professional Services	
Modern slavery prevalence ^	2.1

United States	
T1 Suppliers	56
% Total spend	1.35%
T2 Suppliers*	66
Business Expenses	
Human Capital Services	
Information Services	
Information Technology	
Marketing & Events	
Professional Services	
Travel	
Modern slavery prevalence ^	3.3

New Zealand	
T1 Suppliers	6
% Total spend	<1%
T2 Suppliers*	5
Business Expenses	
Human Capital Services	
Information Services	
Information Technology	
Modern slavery prevalence ^	1.6

United Kingdom	
T1 Suppliers	32
% Total spend	<1%
T2 Suppliers*	7
Business Expenses	
Human Capital Services	
Information Services	
Information Technology	
Marketing & Events	
Professional Services	
Modern slavery prevalence ^	1.8

China	
T1 Suppliers	5
% Total spend	<1%
T2 Suppliers*	158
Financial Services	
Information Services	
Information Technology	
Professional Services	
Modern slavery prevalence ^	4

* Includes tier-two and tier-three suppliers we identified in our Australian Operations supply chain during FY23, but does not reflect the total number of tier-two and tier-three suppliers.

^ Prevalence of modern slavery is based on [2023 Global Slavery Index data](#).

Our actions

In FY23, we implemented various actions to identify and address modern slavery risks in our Australian Operations and supply chain and PwC's offshore controlled entities. This section of our Statement outlines our steps to proactively embed modern slavery protections within our policies and processes and maintain a comprehensive, relevant and effective risk framework.

1

Governance

People & Ethical Conduct Panel

The People & Ethical Conduct Panel is appointed by the Management Leadership Team and is responsible for the oversight and management of serious partner and employee conduct matters, including human rights and modern slavery.

Human Rights Group (HRG)

The HRG provided oversight of our progress on modern slavery and broader human rights considerations in our Australian Operations and supply chains. It included senior representation from key functions at PwC: Corporate Sustainability, People & Culture, Procurement, Risk Operations and Diversity, Inclusion and Wellbeing. In FY23, the HRG provided guidance on the sustainable procurement strategy, hot spot supplier engagement, and as part of the FY23 plan, the HRG remit was reviewed to consider all areas that share responsibility for embedding the human rights policy into the way we work.

Our policies

We have global policies that set out expectations for all PwC employees and our suppliers and subcontractors, accompanied by local policies that directly or indirectly address modern slavery and broader human rights risks in our Australian Operations.

PwC Global Code of Conduct (Code)

The [Code](#) describes a common set of expectations for our conduct. New starters in our Australian Operations must complete PwC's 'Living the Code' training module on commencement with the firm and annual code of conduct training thereafter as part of our firmwide mandatory training program. In addition, all partners and staff must certify compliance with the Code through our Annual Compliance Confirmation. Our people are responsible for their behaviour, and breaches of the Code may result in disciplinary action, including termination of employment.

PwC Global Third Party Code of Conduct (TPCOC)

The [TPCOC](#) requires our suppliers and subcontractors to meet the same standard of conduct we expect of ourselves. Our TPCOC prohibits any involvement in modern slavery and human trafficking. We require suppliers and subcontractors to comply with the TPCOC as part of their contract with us.

We also communicate our expectations about TPCOC compliance to suppliers in writing from time to time, and via our website. If we find a breach of the TPCOC, we escalate it via our Ethics & Conduct, Procurement and Business Risk teams for investigation and remediation.

As part of our recent review of practices against our global network regulations and policies, we identified that some supplier contracts did not include reference to the global TPCOC, and have developed a plan to address this. Notwithstanding this, since February 2023, all procurement contracts have included Responsible Supply Terms (RST) which include modern slavery provisions and the global TPCOC.

PwC Australia's Human Rights Statement

The [Human Rights Statement](#) sets out our shared responsibility to respect and uphold the human rights of our people and the people we work with, directly or indirectly. It also describes the expectations we have for our suppliers and clients. The Statement aligns with the [PwC Global Human Rights Statement](#) and is regularly reviewed to reflect our ongoing engagement with stakeholders, as well as emerging requirements and good practices.

PwC Australia's Whistleblower Policy

The [Whistleblower Policy](#) provides a framework to report genuine concerns of misconduct, malpractice, irregularities or any other behaviour that is (or is perceived to be) dishonest, corrupt, illegal or inconsistent with our values or policies, including modern slavery concerns. The policy applies to our people, clients, suppliers, their personnel and any other individuals we have contact with while conducting our business activities.

PwC Australia's Grievance Procedure Policy

The Grievance Procedure Policy provides a framework for our people to raise work-related grievances and other matters connected with our firm, including modern slavery. This policy is available on our internal policies site and is regularly reviewed.

PwC Australia's Making Ethical Business Decisions Policy

This policy sets expectations for working ethically, including reporting unethical behaviour and preventing corruption or unlawful behaviour. It explains what people can do if they encounter an unethical situation at work and how the report will be handled. This policy is available on our internal policies site and is regularly reviewed.

PwC Australia's Procurement Policy

The Procurement Policy outlines our expectations around purchasing goods and services. It embeds our commitment to work with ethical and responsible suppliers willing to meet specific standards described in the TPCOC, including labour and workplace management and human rights. The policy is available on our internal policies site and is regularly reviewed.

Review of policies

In FY23, we reviewed our Procurement Policy in line with our sustainability strategy to include human rights and anti-slavery requirements with the implementation scheduled for FY24. The updated Procurement Policy embeds mandatory requirements for our business when engaging third party suppliers to purchase goods and services. The requirements outline that all suppliers must be willing to meet the expectations outlined in the TPCOC, PwC's Responsible Supply Terms and PwC's Human Rights Statement. All suppliers must also undergo PwC's supplier due diligence process as part of sourcing and onboarding. This ensures that the appropriate steps are completed before engaging with or paying a supplier.

Third-party risk

PwC Australia's Procurement team has dedicated functions, including Operations, Risk & Governance and Sustainable Procurement, that manage third party governance and compliance in our Australian Operations. These functions work collaboratively to screen suppliers, conduct interviews with hotspot category suppliers, manage third party procurement policies and procedures, facilitate the investigation of any adverse reports or supplier non-compliance with PwC policies and codes, and administer our supply base management system. For PwC's offshore controlled entities, teams with procurement responsibilities work with their respective legal and risk teams to manage third party risk and compliance matters.

PwC ASEANZ's offshore controlled entities

In FY23, PwC Australia continued to work with Offshore Local Firms that support PwC ASEANZ's offshore controlled entities in Singapore, Malaysia and New Zealand, and commenced conversations with Philippines, Thailand and Indonesia through working group meetings. Ahead of these meetings, PwC Australia's Procurement team sent a survey to the Offshore Local Firms (along with PwC PNG). These firms responded with insights into the processes they have in place to manage modern slavery risks in their supply chain and how PwC Australia's Procurement team could support them in addressing gaps and enhancing processes in FY24. PwC Australia's Procurement team provided all Offshore Local Firms with shared learnings and guidance material 'Managing Modern Slavery Risk in Procurement'³, supplier due diligence processes, and policies and templates used in our Australian Operations.

Additionally, we canvassed opportunities for Offshore Local Firms to enhance third party due diligence including managing risk by reviewing governance processes, collaborating with their client teams to utilise existing due diligence and third party screening processes and supplier onboarding questionnaires and including human rights and anti-slavery requirements in Purchase Order terms and conditions.

During FY23, Offshore Local Firms in Singapore and Malaysia screened their new tier-one suppliers using a third party information bureau, similar to the approach taken by our Australian Operations.

³ Also shared with PwC PNG.

PwC PNG

In FY23, PwC PNG maintained its focus on third party and supplier governance through its governance group, which comprises of members from its Risk, Human Resources, Finance and Technology functions. This group met periodically to monitor PwC PNG's adoption of the TPCOC and human rights protections and, among other things, continue to develop and implement its supplier risk assessment framework. The lead of PwC PNG's governance group and members of the finance and risk teams met with PwC Australia's Procurement team to exchange learnings and experiences and discuss opportunities for FY24. PwC Australia's Procurement team aims to continue to support PwC PNG to complete developing its formal supply chain risk assessment along with other supplier due diligence processes.

2

Risk Assessment

We have used the United Nations Guiding Principles on Business and Human Rights (UNGPs) guidance on the business' continuum of involvement (cause, contribute and directly linked) to modern slavery to guide our risk assessment. We recognise that there is a potential to be directly linked through the activities of our operations and supply chain.

Based on the Act's "Guidance for reporting entities", we considered four risk factors, industry risk, supply risk, geographic risk and governance structure/business model (or entity) risks, to identify and assess the potential risk of modern slavery in our operations and supply chain.



Industry risks

- Reliance on migrant, seasonal, base skilled or unskilled workers.
- Reported occurrences of modern slavery or other unlawful labour practices.
- Reliance on offshore labour agencies.



Supply risks

- Systemic, excessive discounted pricing or shortened delivery times.
- Known or reported association of labour exploitation with production/supply of goods/services.



Geographic risks

- High prevalence of human rights violations or occurrences of modern slavery.
- Reported weak rule of law, systemic corruption.
- Inadequate worker protections or high prevalence of law enforcement hostility towards workers.



Entity risks

- Reported non-compliance or convictions in connection with human rights or modern slavery laws.
- Poor or inadequate policies, processes, including candidate – funded recruitment practices.
- Poor reporting mechanisms or opaque and complex supply chains.

Risk assessment

We adopt a two-phase approach in our Australian Operations supply chain.

1. Inherent risk⁴ assessment: We identified and categorised risks of modern slavery incidents in our tier-one supply chain (excluding suppliers who are PwC network firms), considering the supplier's industry, goods and services supplied and geographical location. Categories determined to have a high prevalence of modern slavery were deemed to be 'hotspot' categories and suppliers in those categories were given a high inherent risk rating.

2. Residual risk⁵ assessment: Adopting a risk-based approach, we completed further due diligence on hotspot category suppliers with whom we have a realistic opportunity to influence positive change. After completing our additional due diligence and other risk-mitigating activities, the number of those hotspot category suppliers deemed to be 'high risk' fell by 47% and only represented 0.28% of our spend in FY23.




FY23 supplier risk assessment results:

Risk type	High risk suppliers	Proportion of FY23 spend	Medium risk suppliers	Proportion of FY23 Spend	Low risk suppliers	Proportion of FY23 Spend
Inherent risk	191	28.29%	0	0%	1858	71.71%
Residual risk	100	0.28%	38	1.81%	1911	97.91%

⁴ The unmitigated level of risk; an assessment of the risk without any critical controls operating or in place, any risk management actions or other mitigating activities.

⁵ The risk remaining after considering the effectiveness of treatments and critical controls applied to reduce the likelihood and impact of the risk.

In FY23, we identified the below seven potential modern slavery risk areas, otherwise known as “hotspots” within our operations and supply chain. As modern slavery risks may be found through the goods and services we procure and the geographies in which we operate, these common hotspots translate to inherent risks. The following risk assessment is based on the four categories of risk including industry, supply, geography and entity:

Hotspot	Category	Goods or services	Modern slavery risk	Potential forms of modern slavery
Offshore operations		These are operations located outside of Australia that include partners and staff directly employed by PwC ASEANZ's offshore controlled entities who provide skilled services and access to resources.	Some of our owned or controlled offshore entities operate in countries with a higher prevalence of modern slavery. While we assess the risk of modern slavery occurring as low, given entities are subject to PwC network regulations and policies, we acknowledge that there is always a potential risk. We note that these entities are subject to heightened levels of risks, which increase where there is overlap with other risk factors.	Forced labour, debt bondage
Contingent workforce	 	Approximately 11% of the workforce in our Australian Operations are contingent workers. Some of PwC's offshore controlled entities also use contingent workers. Most of these contingent workers are skilled specialists, and in some cases are self-employed, providing professional services for internal PwC or external client matters.	There is a potential risk of being directly linked to modern slavery, where contingent workers (typically in administrative and support roles) may be more vulnerable when engaged via managed services providers. This is especially the case where there is poor visibility of the arrangement between the worker and the provider. This risk may also increase when the arrangement is located overseas.	Forced labour, debt bondage, deceptive recruitment for labour services
Facilities cleaning and simple maintenance services	 	PwC Australia and our offshore controlled entities engage suppliers who provide cleaning and simple maintenance services (including for COVID-19 safe practices) across our offices. Less than 1% of supplier spend in our Australian Operations goes to organisations operating in this hotspot category.	There is a potential risk of being directly linked to modern slavery, where workers in these industries may come from vulnerable populations within and outside Australia. This risk is heightened when we have limited visibility of their management and where workers perform base-skilled tasks or work outside business hours.	Forced labour, debt bondage deceptive recruitment for labour services
Stationery and branded merchandise products	  	From time to time, we buy stationery and branded merchandise for use in marketing campaigns or related initiatives. PwC Australia buys these products from a limited number of suppliers for our Australian Operations. Our offshore controlled entities buy these products from various suppliers, directly from, or through, their respective Offshore Local Firms.	There is a potential risk of contributing to or being directly linked to modern slavery when we use suppliers that rely on offshore supply chains over which we have limited visibility. This risk may be heightened when goods are made by base-skilled workers on a demand basis or under pressure of unreasonable deadlines.	Forced labour, debt bondage
IT hardware and peripherals	  	We use various technology hardware as part of our day-to-day work, including laptops, monitors, headsets, keyboards and other IT peripherals. In our Australian Operations, we source laptops directly from the manufacturer. We purchase all other IT peripheral products from a limited number of suppliers based in Australia with onshore and offshore supply chains. Our offshore controlled entities buy these products from various suppliers, either directly or through their respective Offshore Local Firms.	There is a potential risk of being directly linked to modern slavery when we use suppliers that rely on offshore and/or complex supply chains over which we have limited visibility. This risk is heightened when goods are made by base-skilled workers on a demand basis.	Forced labour, debt bondage, deceptive recruitment for labour services
Offshore suppliers	 	In FY23, we engaged 17 offshore suppliers in our Australian Operations based in countries with a high prevalence of modern slavery risks. We also engaged our offshore controlled entities in India and the Philippines (co-owned with other PwC network firms), to perform, or help us perform, services for our clients, such as client relationship management, systems administration and quality reviews. Our offshore controlled entities also use offshore suppliers and other PwC network firms globally.	There is a potential risk of our Australian Operations contributing to or being directly linked to modern slavery, as we have identified tier-one suppliers that are based in countries with higher modern slavery risks. PwC's offshore controlled entities also engage with offshore suppliers that are based in high-risk countries. This modern slavery risk increases where there is an overlap with other risk factors.	Forced labour, debt bondage, deceptive recruitment for labour services
Hotels and accommodation suppliers		We use various hotels across Australia and around the world for business-related travel. Primarily, the hotels we use are part of a 'preferred hotel' list comprising approximately 80 hotels in Australia and 1,500 hotels globally. The list is managed at a global level across the PwC network and is reviewed annually. In most cases, the hotels we use are franchised under global hotel groups that do not own or control those individual hotels.	There is a potential risk of being directly linked to exploitation within the hotel accommodation industry due to its increased use of vulnerable workers, limited oversight from global hotel groups as franchisors, and limited view of guest activities within the booked accommodation.	Forced labour, deceptive recruitment for labour services, human trafficking

Key



Industry risks



Supply risks



Geographic risks



Entity risks

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Due Diligence

PwC Australia continues to embed due diligence activities and protocols in our day-to-day operations to tackle modern slavery risks.

PwC's offshore controlled entities due diligence

All PwC network firms (including PwC's offshore controlled entities) must comply with network policies, including the Code and TPCOC. While compliance is subject to self-assessment, PwCIL may, from time to time, require PwC network firms to undergo reviews or audits.

We continued to work with our offshore controlled entities in Singapore, Malaysia and New Zealand, as well as PwC PNG, and commenced initial discussions with offshore controlled entities in Indonesia and the Philippines to align how we address human rights, including modern slavery issues, using the TPCOC, the Code and the PwC Global Human Rights Statement. The collaboration identified suggested opportunities for the offshore controlled entities to take actions in FY24 based on local requirements, such as streamlining supplier TPCOC compliance, category-specific supplier questionnaires and risk assessments.

We will continue to seek and encourage collaboration across these regions to address modern slavery risks.

Contingent workforce due diligence

Approximately 11% of the workforce in our Australian Operations were engaged as contingent workers either directly or through labour-hire agencies in FY23. Most contingent workers are skilled specialists providing professional services for internal PwC or external client matters.

All labour-hire suppliers to our Australian Operations must follow applicable laws regarding licensing, workplace health and safety, right to work, fair pay and human rights. These agencies must also confirm that they comply with our TPCOC.

In our offshore controlled entities, contingent workers are primarily engaged directly or through their PwC Local Firms, which operate under the Code. Our due diligence activities did not identify any reported modern slavery incidents occurring in these agencies' operations or supply chains in FY23.

Client acceptance process

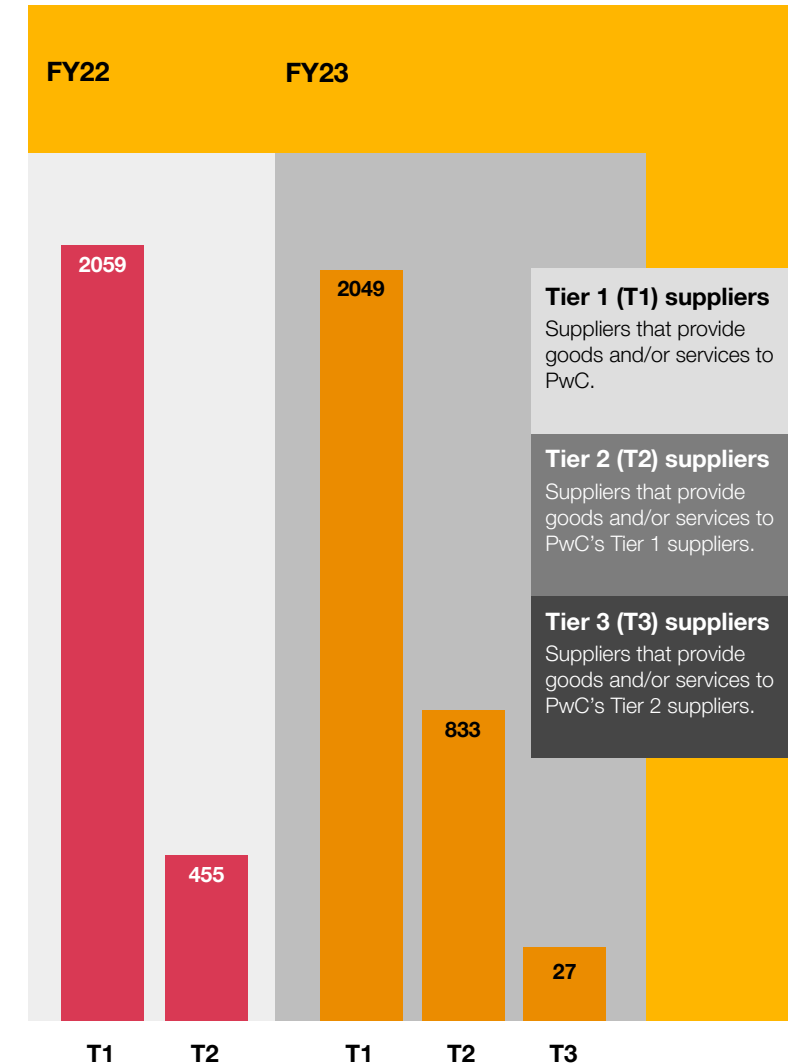
PwC Australia continues to look at ways to support our engagement teams with human rights (including modern slavery) considerations in the client acceptance process. The Business Risk team is notified in the event that a human rights and/or modern slavery concern is raised by the engagement team in the client acceptance process. This enables the team to follow up with the relevant engagement leader for further assessment. As this process has recently commenced, we continue to monitor in order to strengthen its effectiveness.

Supplier due diligence

Supplier screening

In FY23, we screened 100% of new and existing tier-one suppliers to our Australian Operations who were paid via our Accounts Payable function (other than suppliers who are PwC network firms) through self-assessments and desktop screening using third party information bureaus. We also continued to screen tier-two suppliers and a small number of tier-three suppliers, focusing on those tier-two and tier-three suppliers who work with our tier-one suppliers in modern slavery hotspot categories. During the year, PwC Australia's Procurement team also supplemented the desktop screening process with an ongoing screening function that notifies the Procurement's Operations and Risk team if there are any changes to a suppliers' profile. Should any adverse results be flagged, the team will investigate in a timely manner.

We did not identify any modern slavery incidents through these screening activities. We acknowledge that this does not eliminate the possibility of modern slavery in our supply chains.



During the year, we enhanced our supplier self-assessment process in our Australian Operations supply base management system by implementing a risk-tiered supplier onboarding approach to identify and assess our supplier risks, including modern slavery and other human rights issues. This system captures relevant information through updated, streamlined and tailored onboarding questions. Based on supplier feedback, we adapted our process to allow tier-one suppliers to reconfirm their data in our system each year. This gives them the opportunity to provide additional information including any changes and issues via a simplified, short form questionnaire. These improvements help us identify and address suppliers in hotspot categories sooner and at meaningful points in the engagement.

PwC ASEANZ's offshore controlled entities in Malaysia and Singapore continue to embed risk and due diligence processes in their operations and compliance with our TPCOC. In FY23, we continued to share with all our offshore controlled entities our evolving supplier due diligence approach through guidance materials and templates that were developed for our offshore controlled entities to encourage alignment across our various territories in addressing modern slavery risks.

Supplier engagement in hotspot categories

In FY23, we committed to focusing the risk assessment approach for our Australian Operations on suppliers in modern slavery risks, based on their geography and category of supply. We identified 191 suppliers that were deemed a 'high' inherent risk of modern slavery to people involved in their operations and supply chains. We further narrowed the scope to those suppliers with whom our spend exceeded AUD \$50,000 per annum. We interviewed 51 suppliers in this category, representing 85% of our total hotspot category supplier spend.

Introducing a spend threshold criteria to our due diligence activities allows us to focus on those supplier relationships where we have the greatest leverage. We discussed how they are addressing their modern slavery risks and how we can support each other to improve both our approach and their approach in addressing those risks.

During the year, we reviewed the Modern Slavery Statements of hotspot category suppliers who are required to submit statements. The review enabled us to hold targeted discussions with our suppliers and provided a deeper understanding of each supplier's commitments and level of maturity towards addressing modern slavery risks in their operations and supply chain.

We reserve the right not to engage or, if possible, to terminate our existing engagement with suppliers that do not cooperate with our reasonable requests for information or action. We have monitored and increased engagement with our relevant supplier(s) to remediate any issues raised and we have not had to terminate any suppliers.

Responsible supply terms and conditions

In our Australian Operations, our new supplier contracts (other than supplier contracts with other PwC network firms) include responsible supply terms and conditions that require suppliers to implement reasonable controls to ensure they appropriately remediate any actual or perceived breach of the TPCOC or a modern slavery incident.

The terms allow us to suspend services or terminate the agreement if the breach or incident is not remedied within a reasonable time frame.

We take a risk-based approach for incumbent contracts, focusing on suppliers in modern slavery risk hotspots. We also include the responsible supply terms and conditions in our template Purchase Order terms, which we use for a broad cross-section of our tier-one suppliers.

Many of our offshore controlled entities have an obligation embedded into their template supplier agreements for suppliers to comply with the TPCOC. PwC Australia's Procurement team is working with PwC PNG and PwC ASEANZ's offshore controlled entities in Malaysia and Singapore (and their respective Offshore Local Firms) to continue to enhance their supplier contracts and Purchase Order terms.

Case study

Pilot program:

Enhanced terms

As part of the FY23 Sustainable Procurement Strategy, PwC Australia's Procurement team ran a pilot program to bolster how we addressed the inherent modern slavery risks associated with contingent labour hire. It involved making enhancements to our responsible supply terms to mitigate the risk of forced labour commonly associated with contingent workers, particularly those who may be more vulnerable due to a lack of visibility of employment arrangements.

Five suppliers of contingent workforces were selected to take part in the pilot programme. The Procurement team engaged with these suppliers to explain the purpose behind the changes to the responsible supply terms before being provided a contract variation. In these meetings, the suppliers had an opportunity to ask questions about the new terms and why PwC proposed them.

The proposed changes included:

- prohibition against employees/workers having to directly or indirectly pay fees, charges, expenses or incurring financial obligations in order for an employee to secure their employment or payment.
- prohibition against destroying, concealing, confiscating or exclusively possessing, permanently or otherwise, travel or identity documents of an employee/worker⁶.
- ensuring each employee/worker is provided a written contract in a language they can understand, detailing all terms and conditions of employment.
- prohibition against engaging in any form of contract substitution, deceptive recruiting or any other actions of a similar nature.
- ensuring all employees/workers have access without restriction to a grievance mechanism.
- prohibition against imposing penalties or restrictions against employees/workers should they request to resign.

All suppliers accepted the proposed changes, and the contract variations were executed.

The Procurement team followed up with the five suppliers to understand the impact of the additional processes that now formed part of the responsible supply terms. One supplier noted that, since accepting the terms, they had taken active steps to align with PwC's request. Other suppliers mentioned that they did not find the new terms onerous as they already had a level of processes and procedures in place to comply with the requirements. Some mentioned that other customers had asked for similar requirements, suggesting a growing focus point that organisations are wanting to address. Overall, the pilot was successful in enhancing our responsible supply terms to prohibit the exploitation of contingent labour hire. It also showcased the willingness of these suppliers to address the risks inherent in the contingent workforce category.

Following the review of the learnings and the success from the pilot, we aim to roll out the enhancements to the responsible supply terms to other key contingent workforce suppliers in FY24.

⁶ Sometimes, employers of migrant workers retain their identity documents or passports. While this in itself does not constitute forced labour, it can result in the worker's freedom of movement being restricted (e.g. cannot leave the country without the permission of the employer) and increase risks of them becoming victims of forced labour. Source: United Nations Global Compact, Addressing the Retention of Identify Documentation, Verite. <https://unglobalcompact.org/library/781>.

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Training

We continue to support our people in understanding their roles and responsibilities in identifying and addressing modern slavery risks in our operations and supply chains.

We recognise that modern slavery is a complex global issue and have leveraged firm-wide training to provide our people with a practical understanding of what modern slavery means at a global level. At a local level, our people can access resources available on our intranet to further build on their knowledge in these areas. We delivered an optional upskilling session for people who volunteer on not-for-profit boards.

Australian Operations

New starters training

All new starters are required to complete the mandatory Modern Slavery Awareness training. It is a 20-minute interactive upskilling session that includes a knowledge quiz. This training is aimed at helping our people to better identify human rights risks in their work and the third parties they engage with.

Resources

PwC Australia's Corporate Sustainability and Procurement internal sites provide our people with information and reference materials on modern slavery risks and human rights. The Corporate Sustainability and Procurement teams continue to work together to update the guidance document for our client engagement teams with key information in response to questions about modern slavery and human rights commonly asked by our clients.

PwC Australia Procurement upskilling

The Procurement team leverages internal and external knowledge repositories (round tables, webinars, newsletters etc.) throughout the year to ensure ongoing upskilling and awareness of industry matters, including modern slavery and human rights. We will continue to utilise internal and external resources in FY24.

PwC Onboard upskilling

PwC Australia's Corporate Sustainability team runs a community program called [PwC Onboard](#), which connects our people to board and advisory roles with not-for-profits they are passionate about.

Recognising the importance of the social pillar in ESG, we developed and delivered an optional upskilling session for the PwC Onboard community, which covered the following topics:

- The growing opportunity for entities to focus on the 'S' in ESG.
- What modern slavery is and the obligations of boards under the Act.
- The reporting requirements of the Act and the impending review of the legislation.
- Key modern slavery risks and mitigants in operations and supply chains.
- The experience of modern slavery victims and why business mitigation and remediation matters.

Global capability and upskilling programmes

As part of a global network of PwC firms, our people have access to training offered to the Asia Pacific region. In FY23, the global firm presented specialised training sessions that expanded on the issue of modern slavery as well as the drivers that lead to conditions in which modern slavery and social impacts manifest.

These sessions have helped to build the capabilities of our people and enhance their client and supplier engagements by providing a more holistic understanding of modern slavery.

99%

of PwC Australia's new starters completed the Modern Slavery Awareness training module by 30 June 2023

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Grievance and remediation

At PwC Australia, our people, clients and suppliers have access to grievance mechanisms to raise any concerns, including matters related to modern slavery and broader human rights.

PwC's offshore controlled entities also provide grievance mechanisms in line with their local policies and global commitment to ethical behaviour, compliance with the law, PwC's Global Code of Conduct and embedding a Speak Up culture.

In response to PwC's [Commitment to Change](#), we have enhanced the consistent use of one central ethics case management system to strengthen our grievance process. A new Australian Ethics and Conduct sharepoint site has been created and promoted to encourage a "Speak Up" culture and enhance access to relevant ethics training and policies.

PwC Australia's 2023 firmwide Mojo (employee engagement) survey

Respondents in our Australian Operations agreed or strongly agreed with the statement:

79%

"At PwC, I feel comfortable discussing or reporting ethical issues and concerns without fear of negative consequences."

80%

"I am comfortable reporting ethical matters with little to no consideration of being retaliated against."

Speak Up Campaign

PwC Australia's New Starter training and firmwide annual mandatory training refreshers include information about our Speak Up Campaign as part of the Ethics and Business Conduct learning module. The campaign provides our people with practical guidance on what to do if they are subject to inappropriate behaviour, witness it or have an incident reported to them.

Our people can access the dedicated Speak Up internal site and toolkit that provides support and guidance on how to make a report, including the PwC Ethics Helpline, and the sources of support available, such as the Employee Assistance Program and various external support networks. This is underpinned by our People and Partner Consequence Management Policies for managing the consequences of unacceptable behaviours in a robust, transparent and consistent manner.

PwC Ethics Helpline

Our Navex-administered PwC Ethics Helpline, which is available to all PwC employees and external stakeholders, including clients and third parties, provides a confidential 24/7 service to receive reports of matters of concern by phone or online. Local adaptation of recorded messages, consent language and reporting forms are provided in accordance with our local whistleblower obligations. Once reports are logged with Navex, cases are sent to the Business Conduct Officer and the Head of Employee Relations for triage and determination of who should be involved and specific actions required.

PwC's offshore controlled entities also report and manage ethics and conduct issues through the helpline.

Operations remediation

PwC Australia's National Incident Response Team (**NIRT**) responds to incidents that have the potential to cause significant harm or impact to individuals, reputation, assets or business operations.

The incident response framework that the NIRT operates to includes the following human rights (including modern slavery) considerations:

- assessing the continuum of involvement⁷ (caused, contributed to, or are directly linked to) to an identified modern slavery incident.
- taking appropriate action where there is a continuum of involvement to an identified modern slavery incident.
- taking a human-centred approach throughout the NIRT process.

⁷ See [UNGPs](#).

Supply chain remediation

PwC Australia is committed to building a strong and sustainable supply chain by collaborating with our suppliers and sharing our knowledge and experience. We know that effectively engaging with suppliers promotes greater transparency and allows us to assess our supply chain and reach beyond tier-one suppliers. It also helps us to mitigate risks and remediate any identified modern slavery incidents.

In FY23, our Procurement team, with support from key business specialists, developed a firm wide modern slavery supplier incident remediation strategy that sets out the steps we will take if we become aware of a modern slavery incident in our Australian Operations' supply chains. The strategy takes a human rights-based approach for responding to these incidents.

The modern slavery supplier incident remediation strategy process will be an essential guidance tool for our business to have as a practical and clear principles-based process to consider the impacts to the victims that can be applied to different contexts, should a modern slavery incident occur in the supply chain of our Australian Operations. It steps through key actions we might choose to take in the event of an incident, including gathering information, notification, incident verification, the roles of the NIRT and incident response, remediation design and ongoing monitoring and reporting.

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Monitoring and reporting

Tracking our actions allows for continuous improvement in measuring the effectiveness of PwC Australia's approach to addressing modern slavery risks.

In FY23, we extended our Modern Slavery In Supply Chain Risk dashboard to include a Supplier Risk Dashboard. The extended dashboard incorporates elements of commercial, ESG and risk, including data from our supplier due diligence and risk assessments, to provide our business with a holistic view of a supplier's risk profile. It also captures information about tier-two suppliers as we continue to expand on our efforts from FY22. We are also leveraging our contract repository system to capture and track information on our suppliers to identify areas of concern and incorporating this information into our reports to our stakeholders. The details of the dashboard were made available to our offshore controlled entities and will be shared with our PwC ASEANZ and PwC PNG teams to provide a better understanding of the broader supplier risks and as an example of what could be adopted by their teams.

Suppliers interviewed as part of our FY23 due diligence process⁸ showed a maturing in their understanding of and approach to addressing modern slavery risks in their own operations and supply chains. This was evident through the increase or shift in their due diligence processes, such as commencing interviews or conducting audits with their select suppliers (PwC's tier-two suppliers). These informative and transparent conversations, which we continue to have with our suppliers in key hotspot category, shows how they are also continuing to improve the way they address modern slavery and human rights risks in their own operations and supply chain.

⁸ These suppliers were also interviewed in FY22.

PwC Australia, PwC ASEANZ and our respective offshore controlled entities continue to participate in PwC network reporting of actions taken to improve the adoption of the TPCOC.

Submission

In November 2022, PwC Australia made a submission in response to the review of the Act issues paper. We held a consultation session with non-executive directors and hosted a roundtable event in Adelaide amongst other consultative activities to support our submission. The report of the statutory review has since been issued and we support the recommendations.

Assessing the effectiveness of our actions

Assessing the effectiveness of our actions is critical for ensuring we understand the impacts of our business on modern slavery and broader human rights, and continually improve our approach.

In FY22, we identified some standard modern slavery key performance indicators (**KPIs**) and can report on the following for FY23:

Operations

KPIs	
Percentage of new starters who completed the “Essential IQ Modern Slavery Awareness” training module	99% of new starters
Percentage of our people that ‘feel comfortable discussing or reporting ethical issues and concerns without fear of negative consequences’, as reported in Mojo survey (our employee engagement survey)	79% of our people
Number of policies reviewed for compatibility with human rights	1
Number of stakeholders trained in modern slavery	Global capability and upskilling programmes – 28 people ⁹ from our Australian Operations

Supply chain

KPIs	
Percentage of suppliers paid via our Accounts Payable function screened via third party information bureau	100%
Number of suppliers identified in hotspot categories	191
Number of hotspot category supplier self-assessment questionnaires returned	72
Number of interviews with suppliers operating in modern slavery hotspot categories	51
Number of tier-two suppliers mapped within modern slavery risk hotspot categories	833
Number of modern slavery incidents identified in our supply chain	0

In FY23, there were no reports made through our grievance mechanisms regarding modern slavery.

⁹ This is a partial report of the attendee numbers as the previous learning and development platform did not have the functionality to provide such aggregated data.

Our consultation and collaboration

Consultation

Management and personnel from all reporting entities have worked together on the activities described in this Statement.

We consulted with senior management of the Australian Operations and PwC PNG, as well as PwC ASEANZ senior management with regional-level management responsibilities for its controlled entities. These consultations help us to understand the views of senior management in our offshore controlled entities regarding modern slavery risks and the steps that have been taken to assess and address those risks.

We will continue to engage with all reporting entities as they respond to modern slavery risk in their geographical locations.

Collaboration

PwC Australia advises a number of clients in relation to modern slavery processes and reporting. In addition to these client engagements, PwC also recognises the importance of an appropriate 'tone at the top' and facilitated discussions at non-executive level as follows:

Webinar

PwC Australia presented on the topic "Modern Slavery – The role of the board and business" in a live [webinar](#), which included:

- the growing obligations and opportunities for businesses to focus on the 'S' in ESG.
- what modern slavery is and the obligations of business, including key risks and mitigants in businesses' operations and supply chains.
- the requirements of the Act and the current review of the legislation.
- how leading businesses and boards are engaging in this topic including what steps can be taken if modern slavery risks are identified in your operations or supply chain.
- the experience of modern slavery victims and why business mitigation and remediation matters.

Collaboration series

As part of PwC Australia's regular non-executive director collaboration series, we facilitated a session titled "[Modern Slavery and the role of the Board](#)" which was centred on the business' role in respecting human rights and the obligations of the Board in approving modern slavery statements.

We shared a few questions that boards should be asking their executive teams, such as "Does the Board have a deep understanding of how modern slavery affects its business?" and "How well do we know our supply chain?" We also covered other topics:

- the level of investment required by Boards and business in modern slavery reporting.
- the benefits and drawbacks of imposing a penalty regime and / or mandatory due diligence requirements.
- a tailored approach for modern slavery reporting requirements based on industry and entity type.
- the extent to which voluntary organisations have participated in the consultation process.
- the expected effect that the Act will have on eradicating modern slavery.
- consultation with other jurisdictions that already have, or are considering, modern slavery reporting.

Shared ESG Scorecard

Throughout FY23 PwC Australia's Corporate Sustainability and Procurement teams collaborated on several initiatives relating to ESG, including modern slavery and broader human rights. In particular, the teams developed and delivered against a Shared ESG Scorecard, which captured actions taken to achieve modern slavery and human rights objectives. The teams met regularly to discuss progress, challenges and changes and provided quarterly updates to stakeholders.

Future state

Each year we review our focus areas with the aim of improving our approach and building on our progress. We will continue to collaborate with key stakeholders and seek to raise awareness of modern slavery risks across our value chain.

Our priority areas of focus for FY24 are:

- review the HRG to align with our Management Response and assess its role and responsibilities in the context of the enhanced Risk and Ethics function, and the newly established Management Leadership Team Risk Committee.
- continue to assess the effectiveness of our actions to address modern slavery risks within our Australian Operations.
- continue to provide training and upskilling opportunities for our people.
- develop guidance materials to support our engagement teams with client acceptance / due diligence activities.
- continue to rollout the enhanced responsible supply terms with key contingent workforce suppliers.
- develop a continuous improvement information sheet for small to medium enterprises suppliers to help grow their understanding of modern slavery risks to people in their operations and supply chain.
- work with select medium risk suppliers (identified in FY23) that are within procurement scope to address any identified gaps.



Preparation of this Statement

This Statement was prepared by the Corporate Sustainability team in consultation with key internal stakeholders and assessed by members of the PwC Australia Sustainability Assurance team, for the purposes of:

- confirming that the Statement has addressed the mandatory criteria elements required under the Act and preparation guidance within the 'Guidance for Reporting Entities' dated May 2023 issued by the Australian Government Attorney-General's Department; and
- confirming that supporting evidence was available to substantiate the statements addressing the mandatory criteria made within the Statement.

Our modern slavery response is integrated into our broader work on human rights and we welcome feedback on our Statement at socialimpact@au.pwc.com.

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