

MODERN SLAVERY REPORT

2024



ACCELERATING IMPACT

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Foreword



We are pleased to share CPA Australia's fifth Modern Slavery Statement. As we commemorate the fifth anniversary of the Australian Modern Slavery Act 2018 (Cth), the significance of businesses contributing to global efforts to eliminate modern slavery remains crucial.

In 2024, we witnessed the Australian Government's commitment to implementing key findings from the review of the Australian Modern Slavery Act 2018 (Cth), along with the appointment of Australia's inaugural national Anti-slavery Commissioner. As we navigate the evolving domestic and international landscape in 2025, we are dedicated to addressing potential modern slavery risks pertinent to our operations and supporting our members in their efforts to combat modern slavery.

Since 2020, CPA Australia has focused on enhancing our ability to assess and manage modern slavery risks associated with our business. We have executed a comprehensive three-year plan developed by external experts, resulting in over 50 completed actions.

Our approach to modern slavery is now seamlessly integrated into our regular business processes, encompassing our policies and supplier engagement strategies. Throughout 2024, we continued to apply these practices, including conducting an in-depth review with a major education services provider..

We also understand the importance of empowering our members to manage modern slavery risks effectively. Over the past five years, we have emphasized modern slavery and broader Environmental, Social, and Governance (ESG) risks in our interactions with members

In 2024, we further expanded this work, by:

- updating our sustainability micro-credentials for our members
- producing a sustainability checklist for Boards through our ESG Centre of Excellence (CoE)
- launching an ESG reference guide, that provides a glossary and examples of key sustainability concepts including modern slavery.

Going forward, we intend to maintain our emphasis on member engagement and broader advocacy concerning modern slavery.

This may involve collaborating with the Australian Government regarding anticipated changes to modern slavery legislation and assisting our members in adapting to these legislative amendments.

This statement was approved by the Board of Directors (Board) of CPA Australia Ltd in May 2025, and signed by me in accordance with the requirements of the legislation.

**Dale Pinto FCPA
John Curtin
Distinguished Professor**

President and Chair of the Board

CPA Australia Ltd

May 2025

1 About this statement

This modern slavery statement ('statement') is made under the *Modern Slavery Act 2018 (Cth)* (MSA) by CPA Australia Ltd as the reporting entity (ABN 64 008 392 452) (CPA Australia, we, our, us).

It sets out our efforts to assess and address modern slavery risks over the 2024 calendar year (the reporting period).

As required by the MSA, this statement also addresses modern slavery risks and actions in relation to our three subsidiaries.

These three subsidiaries are not individual reporting entities for the purposes of the MSA. Further information about our corporate structure is set out in Section 2 of this statement.

CPA AUSTRALIA'S MODERN SLAVERY STATEMENT

As CPA Australia and our subsidiaries share similar business models and supply chains, this statement describes our modern slavery risks and responses to these risks across our corporate structure on a consolidated basis.

The Boards of all our controlled entities must act in accordance with all standards and policies that have been adopted and promoted by CPA Australia, including those relating to modern slavery and broader human rights issues.

CPA Australia is registered as a foreign corporation in the United Kingdom (UK) and this statement also meets the requirements of the *Modern Slavery Act 2015* (UK).

Our response to modern slavery is guided by three key principles:

- we actively seek to identify the risk of modern slavery in our operations and supply chains even if we don't find instances of modern slavery
- the risk to individuals is paramount to all other risk considerations
- assessing modern slavery risks and taking actions to address those risks is the right thing to do. It also drives commercial and social value for CPA Australia, which results in value for members.

This statement highlights how we have applied these principles to assess and address modern slavery risks in our operations and supply chains.

The appendix at the end of this report explains how the content in this statement aligns with the requirements of the MSA and the *Modern Slavery Act 2015* (UK).

MODERN SLAVERY

Modern slavery describes situations where "coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom".¹ It involves serious exploitation and grave abuses of human rights.

As defined in the MSA, modern slavery practices include trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour (situations where children are subjected to slavery or similar practices, or engaged in hazardous work) and deceptive recruiting for labour or services.

Modern slavery can occur in all sectors and can happen in Australia as well as overseas.

As outlined later in this statement, there are a range of risk factors which may indicate higher modern slavery risks. These include reliance on complex and fast-moving global supply chains, use of migrant workers, high rates of subcontracting, and use of short-term, unskilled labour.

We have established and refined our response by implementing a three-year modern slavery action plan as shown in Table 1 below.

TABLE 1: OUR MODERN SLAVERY RESPONSE AT A GLANCE

Managing our modern slavery risks

- Our cross functional Social Working Group oversees our response.
- Our Human Rights Policy publicly commits us to respect human rights.
- Our Supplier Code of Conduct and Master Services Agreement set clear standards for suppliers around modern slavery and broader human rights.
- Our Supplier Assessment Questionnaire and deep dives support us to assess supplier risks.

Supporting our members

- Our ESG Strategy provides a framework for our approach to modern slavery and broader ESG issues.
- Our ESG Centre of Excellence (CoE) contributes to policy, thought leadership and advocacy.
- Our tailored resources such as the Modern Slavery Compass, micro-credentials and Sustainability Checklist for Boards support our members.

2 Our structure, operations and supply chain

174,908

MEMBERS

\$84.6 million

OUR SUPPLY
CHAINS

72% Spend in Australia

>560 employees

OUR
OPERATIONS

20 Global offices

CPA Australia is one of the world's largest accounting bodies with a history of more than 136 years. Founded in 1886, we now have 174,908 members around the globe.

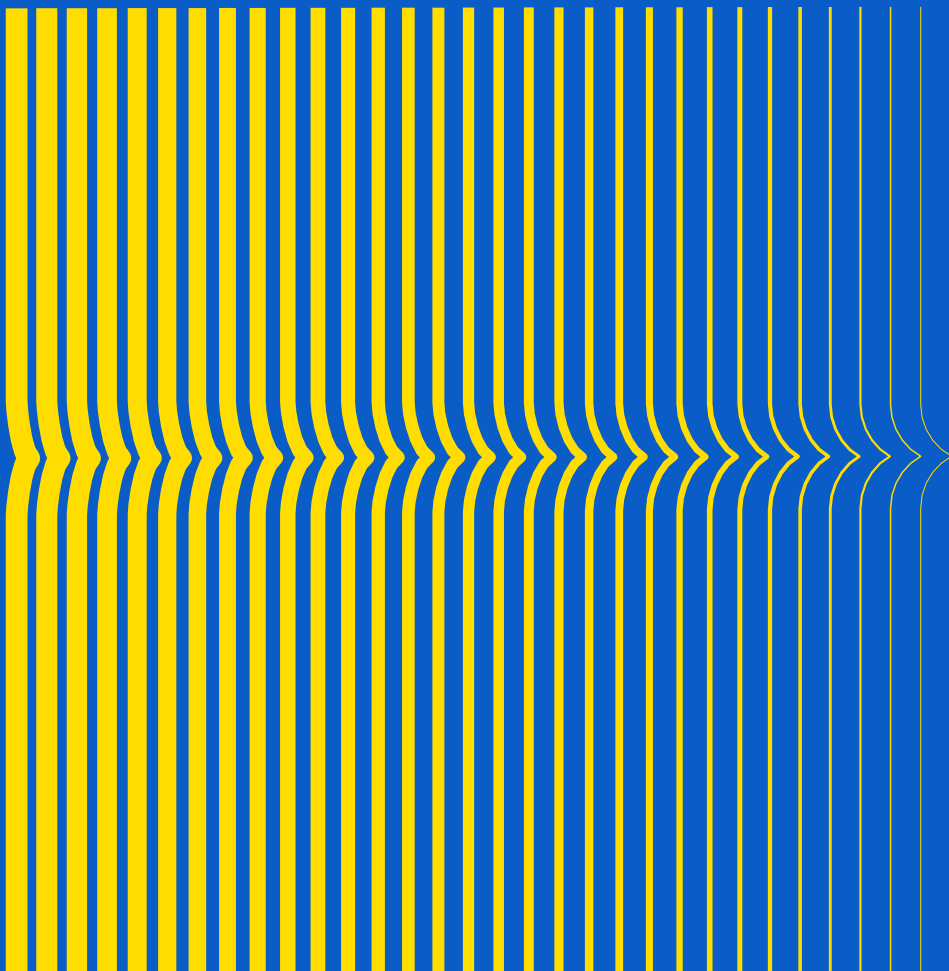
Our core services to members include education, training, technical support and advocacy. Employees and members work together with local and international bodies to represent the views and concerns of the profession to governments, regulators, standard setters, industries, academia and the general public.

OUR VISION

Lead the future of the global accounting profession and develop business professionals with tomorrow's capabilities.

OUR PURPOSE

We're partners for progress, strengthening trusted relationships with members and communities.



OUR STRUCTURE

CPA Australia is a company limited by guarantee incorporated in Australia.

We are governed by a Board elected by the Appointments Council. The Appointments Council comprises a representative from each Divisional Council.

Divisional Councils are comprised of members who act as advocates for CPA Australia and for members of the Division in their regions and spheres of influence. Our governance structure is set out on page 9. Further information about how we have integrated modern slavery into our governance structure, including the role of our ESG Steering Committee and a dedicated Social Working Group, is set out in Section 4.

CPA Australia ultimately controls the following entities:

- CPA Australia (Shanghai) Co. Ltd. a private company incorporated in China to facilitate the provision of services to members in China
- CPA Australia Ltd. Shanghai Representative Office, a non-governmental organisation (NGO) established to allow CPA Australia to carry on activities in China in compliance with the China NGO law.
- CPA Australia (M) Sdn. Bhd a private company incorporated in Malaysia to facilitate the provision of services to members in Malaysia.

OUR OPERATIONS

CPA Australia is one of the world's largest accounting bodies, with a global presence. Our organisational strategy for 2022 to 27, underscores our continued ambition to shape the future of the global accounting profession through education and advocacy.

One of the key initiatives highlighted in the strategy is to lead, support and advocate for our members, including through implementation of CPA Australia's ESG strategy which addresses, among other things, modern slavery.

The operations of CPA Australia and our subsidiaries are primarily focused on the provision of services to members in Australia and globally.

We are partners for progress, and through our trusted relationships, we continue to lead the future of the accounting profession and develop business professionals with tomorrow's capabilities. In doing so, we are helping to advance those who support their communities.

This means regularly engaging with members, employers, academia, government, regulators, standard setters and the community to ensure we understand the current and future needs of the profession.

This is especially important when it comes to issues such as modern slavery. This helps us develop strategies, content, products and services to deliver an experience that meets members' needs and goals throughout each stage of their professional journey.

As at 31 December 2024, CPA Australia and its controlled entities have more than 560 employees located in nine countries. The location and number of our offices has not changed during the reporting period (see page 10).

The majority (90 per cent) of our employees are engaged on a full-time basis, and undertake professional, office-based roles, including education, event planning and member engagement. We also engage a number of contingent workers, primarily for office-based roles. Employees and contingent workers overseas are engaged in accordance with applicable workplace laws.

SERVICES

Our core services include education, training, resources and tools, technical support and advocacy.

We provide these through a range of channels, including our website, INTHEBLACK digital magazine, face-to-face and online events, CoEs for six key policy issues, and a dedicated member contact centre. We also publish the *Australian Accounting Review*, a quarterly peer-reviewed journal.

A large part of our work is advocating for the interests of the profession, members and the public.

Employees and members work together with local and international bodies to represent concerns and issues, like modern slavery, to governments, regulators, standard setters, industries, academia and the general public. Further information about our member engagement and other collaboration is set out in Section 5.

INVESTMENTS

As part of our operations, we invest in equities, equity funds, property funds and bonds, among other investments, in line with our Cash and Investment Policy. These investments are managed by an external investment manager. Information about our engagement with our investment manager during the reporting period in relation to modern slavery is set out in section 4.

Figure 1: our governance structure in 2024

Members

- Divisional Councils
- Council of Presidents
- Appointments Council

Members are governed by the professional requirements of CPA Australia, its Constitution and the By-Laws of the organisation. They elect Divisional councillors, and, on behalf of members, through the Appointments Council, the Board.

Divisional Councils are Councils established under the CPA Australia Constitution.

The Council of Presidents provides advice to the Board on strategic issues and opportunities with an emphasis on sharing the views and preferences of the members.

The Board and Board Committees

- Audit, Risk and Compliance
- Member Engagement
- Education, Policy and Innovation
- Nomination

The Board oversees the execution of the strategy in accordance with the constitution and implements the whole Constitution having regard to corporations law.

Board Committees assist the Board in its decision-making and policy processes.

Advisory Committees

- Professional Education
- Public Practice

These Committees advise management on professional qualifications and public practice.

Compliance Panels

- Disciplinary Panel
- Professional Conduct Oversight Panel

Compliance Panels are created by the Board to review and evaluate the professional conduct of members.

CPA AUSTRALIA OFFICE LOCATIONS

Our registered office is located in Melbourne, Australia. We have more than 174,908 members in Australia and overseas, who are attached to 13 Divisions.

There are eight Divisions in Australia and a further five Divisions across Europe, Greater China, Malaysia, New Zealand and Singapore.

CPA Australia maintains branch offices in Beijing, Shanghai and Guangzhou, China. CPA Australia operates as a registered foreign corporation in the UK.

We have a presence in Indonesia, New Zealand, Singapore, Malaysia and Hong Kong SAR, with offices in each of these countries and regions.

CPA Australia has staffed regional representative offices in Beijing, China; Hanoi and Ho Chi Minh City, Vietnam, Jakarta, Indonesia and Abu Dhabi, United Arab Emirates (UAE).

CPA Australia made the decision to close its Abu Dhabi office on 31 December 2024.

We have 20 offices across:

- Melbourne, Australia
- Canberra, Australia
- Sydney, Australia
- Brisbane, Australia
- Adelaide, Australia
- Hobart, Australia
- Perth, Australia
- Darwin, Australia
- London, UK
- Beijing, Mainland China
- Guangzhou, Mainland China
- Shanghai, Mainland China
- Hong Kong SAR, China
- Kuala Lumpur, Malaysia
- Auckland, New Zealand
- Singapore
- Jakarta, Indonesia
- Abu Dhabi, UAE
- Hanoi, Vietnam
- Ho Chi Minh City, Vietnam.

OUR SUPPLY CHAINS

Procurement for CPA Australia and our controlled entities is managed by a centralised procurement team based in Melbourne. This team oversees key procurement activities and maintains and implements our procurement policies and processes.

Our supply chains reflect the services-based nature of our operations. Unlike many reporting entities in other sectors, we do not have a significant for-retail supply chain or produce or manufacture products.

Our procurement profile remains similar to the last reporting period. We have assessed that our \$84.6 million spend across our global supply chains as at 31 December 2024 was spread across more than 1000 Tier One suppliers of goods or services. Our overall supplier numbers and key areas of spend remained similar to 2023.

CPA PROGRAM

Delivering the CPA Program is a key element of our operations. The program is run via distance learning by a dedicated team within CPA Australia.

The CPA Program is internationally recognised and has a strong focus on the practical application of knowledge within a real-world setting. It goes beyond the numbers to teach the skills needed to reach the next level in leadership, strategy and business. This includes:

- commercial awareness
- emotional intelligence
- communication and collaboration skills
- a technically skilled and solution-driven approach to problem solving
- awareness of the social impacts of accounting.

TOP INDUSTRIES FOR PROCUREMENT OF GOODS AND SERVICES BASED ON SPEND.



Financial services, including insurance broking



Education content, including the publishing of study guides



Media and marketing, including media and creative services



Recruitment, including recruitment agency services



Information and Communications Technology (ICT), including hardware, software and telecommunications goods and services



Construction, including interior design and fit out goods and services



Hospitality, including catering for member events in Australia and overseas



Cleaning, facilities management and security for our offices and events in Australia and overseas.

Each sector of spend may have potential exposure to modern slavery and the risks of modern slavery in our supply chains are detailed in section 3.

OUR SUPPLY CHAINS BELOW TIER ONE

The type and duration of our commercial relationships with our Tier One suppliers varies significantly.

For example, in some cases we have longer-term relationships with key suppliers, such as financial and other professional services providers. In contrast, we also have a range of shorter, ad hoc relationships with other suppliers, such as a catering provider engaged for a specific event.

We also acknowledge that procurement expenditure does not correlate to the level of modern slavery risk, and that we may also be exposed to modern slavery risks through smaller or once-off procurements in other categories not identified above.

As we work to further strengthen our response, we are exploring options to build our understanding of our supply chains below Tier One. Key areas of our spend, including ICT and construction, rely on complex global supply chains which can involve a wide range of materials, activities and services. For example, ICT supply chains may involve sourcing of minerals and other raw materials, multi-stage manufacturing and assembly processes across multiple countries, and a variety of warehousing, transport and other logistics services.

As set out in section 3, we recognise modern slavery could occur at a number of points in these supply chains and that we could be directly linked to this harm through the provision of goods or services to us.

During the reporting period, we undertook a modern slavery deep dive with a Tier One supplier from the education services sector to better understand our supply chains below Tier One and what leverage we may have, or need to build, to help mitigate any apparent risks. A detailed understanding from the deep dive is described on page 19. We will continue to consider additional opportunities for further deep dives in 2025.

3 Our modern slavery risks

This section of our statement describes the modern slavery risks we have identified in the operations and supply chains of CPA Australia and its controlled entities.

We consider that these risks are relevant to each of these entities and have not identified additional specific risks relating to particular entities within our structure.

We recognise that our modern slavery risks may change and evolve over time and we are committed to regularly reviewing our risk profile where appropriate. However, we do not consider our risk profile has changed significantly since our last statement.

HOW MODERN SLAVERY RISKS MAY BE PRESENT IN OUR OPERATIONS AND SUPPLY CHAINS

As set out in our Human Rights Policy, we have a responsibility to respect human rights through all our business activities and relationships under the United Nations Guiding Principles (UNGPs).

This includes the human rights that protect against modern slavery.

Modern slavery risks may be present in our operations and supply chains due to a range of factors, including:

- procurement of products or services from high-risk countries or sectors
- use of third-party recruitment providers, including the recruitment of contingent labour in countries with a high prevalence of modern slavery
- our investment activities, which could lead to us holding equities in other businesses that may have high modern slavery risks.

We believe that our most significant modern slavery risks are likely to be present in our supply chains, rather than our operations.

This reflects the member-focused and services-based nature of our operations, which can present less scope for modern slavery conduct to occur than other sectors and business models.

However, we recognise that the professional services sector, including accounting professionals, may face a range of modern slavery risks, including through their clients.

CPA Australia members provide accounting advice and other professional services to a wide range of businesses and organisations, including those in high-risk sectors and geographies.

We remain committed to supporting and equipping members to respond to modern slavery risks they may encounter through the provision of accounting advice and services.

More information about our engagement with members is set out in Section 5.

Consistent with the UNGPs, we consider that our most significant modern slavery risks are those that would result in the most severe harm to people rather than our business. These risks are described in Table 2.

MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN.

We seek to engage suppliers with proven values, ethics and business practices, including those related to modern slavery and broader human rights issues. This includes setting clear standards for supplier behaviour through our Supplier Code of Conduct. We believe that we can also work with suppliers to positively influence their response to modern slavery risks.

Building on our 2020-23 review of modern slavery risks in our procurement spend and supplier spend data, for 2024 we continued to consider the following modern slavery risks in our supply chain that pose the most severe risks to people.

Section 4 explains the actions we have taken to assess and address these risks.

In addition to the modern slavery risks shown in Table 2, we recognise that activities such as sourcing of merchandise and outsourced design and printing services, as well as office consumables, may also involve modern slavery risks.

Corporate travel, including working conditions for staff engaged by accommodation services providers, may also be a potential risk area.

UNGPS

The UNGPs are the recognised global standard for preventing and addressing human rights harm by businesses.

They provide an important framework to help us, and other businesses, understand and respond to modern slavery risks.

We applied the UNGPs in our modern slavery risk assessment (described in our 2020 statement) to identify and explain how we may cause, contribute to, or be directly linked to modern slavery, and understand how we should respond.

Our ongoing risk assessment activities are described in Section 4

TABLE 2: MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

Supply chain potential risk description	Risk level	Potential level of involvement	Risk rationale
Procuring ICT goods and services that could be produced or delivered using modern slavery.	Medium to high	Directly linked	<p>We procure a range of electronic products like laptops, computers and mobile phones to support our business activities. These products have long and complex supply chains and can involve high modern slavery risks. This includes the potential use of exploited labour in overseas factories where these products are manufactured, and the use of conflict minerals in components, which may be mined or processed by victims of modern slavery. There may also be modern slavery risks associated with the provision of support services for ICT products, like offshore call centres, which may be located in countries with weaker enforcement of labour laws.</p> <p>Although the ICT sector can involve large multinational suppliers, these entities may not be taking adequate steps to address modern slavery risks. In 2022, the KnowTheChain benchmark assessed 60 global ICT companies' efforts to address forced labour in their supply chains. The average score received by the companies covered by the benchmark was 14/100 and KnowTheChain found that many were not undertaking sufficient due diligence to identify and manage forced labour risks. The NSW Anti- Slavery Commissioner has also identified ICT products as involving a high level of inherent modern slavery risk¹.</p>
Procuring cleaning, property management, maintenance and construction goods and services that could be produced or delivered using modern slavery.	Medium to high	Contribute/ directly linked	<p>We rely on cleaning, property management, maintenance and construction goods and services to operate all our offices. These goods and services can involve high modern slavery risks, including risks associated with the widespread use of unskilled migrant labour and unauthorised subcontracting, which have been reported to be more vulnerable to modern slavery. In some cases, we may procure these goods and services directly, while in other cases they may be provided by our external building managers.</p> <p>Modern slavery in these sectors can occur in Australia, as well as overseas. However, modern slavery risks associated with these products and services may be greater in some high-risk countries where modern slavery is more prevalent. While we do not think it is likely that we would contribute to modern slavery in this area within the meaning of the UNGPs, we recognise that there may be a possibility we could if appropriate risk management steps were not in place (as set out in section 4).</p> <p>The potential modern slavery risks associated with commercial cleaning providers have been highlighted by various stakeholders. For example, a 2021 report by the Australasian Centre for Corporate Responsibility noted key risk factors include complex subcontracting, low barriers to entry, a largely migrant workforce and aggressive pricing competition. The NSW Anti- Slavery Commissioner has identified cleaning services, some activities associated with property maintenance, and contingent labour for construction as involving high levels of inherent modern slavery risk¹.</p>

¹ NSW Anti-Slavery Commissioner's Modern Slavery Inherent Risk Identification Tool (IRIT): Due diligence and reporting | Communities and Justice (nsw.gov.au)

TABLE 2: MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN (CONTINUED)

Supply chain potential risk description	Risk level	Potential level of involvement	Risk rationale
Procuring hospitality goods and services (including labour and food and beverage products) that could be produced or delivered using modern slavery	Medium to high	Directly linked	<p>In 2024, we hosted more than 361 in-person events globally. For many of these, we relied on labour hire delivered by third party suppliers in the hospitality industry.</p> <p>The hospitality sector is a high-risk sector for modern slavery in Australia and overseas, due to the use of short-term unskilled labour. There is also a risk that some food and beverage products provided during our events (such as tea, coffee, fruit, seafood and other relevant products) may be linked to modern slavery. Modern slavery risks associated with these products and services may be greater in some high-risk countries where modern slavery is more prevalent. While we do not think it is likely that we would contribute to modern slavery in this area within the meaning of the UNGPs, we recognise that there may be a possibility we could if appropriate risk management steps were not in place (as set out in section 4).</p> <p>Hospitality services such as catering have also been identified as a modern slavery risk by other Australian companies from a range of sectors in their modern slavery statements, including professional services, banking, mining and airlines. Cases of alleged modern slavery have also been identified in the broader Australian hospitality sector, including in relation to restaurants and other retail outlets. The NSW Anti-Slavery Commissioner has also identified catering as involving a high level of inherent modern slavery risk.</p>

MODERN SLAVERY RISKS IN OUR OPERATIONS

We have identified that the modern slavery risks in our operations include those set out in the table below.

TABLE 3: MODERN SLAVERY RISKS IN OUR OPERATIONS.

Supply chain potential risk description	Risk level	Potential level of involvement	Risk rationale
Hiring arrangements for employees and contingent workers for overseas offices and our operations.	Medium	Contribute/directly linked	<p>In some circumstances, we recruit employees and contingent workers overseas, including through third-party recruitment firms. Generally, these recruitment processes are for professional, office-based roles which tend to carry a lower modern slavery risk.</p> <p>Recruitment processes can involve high levels of modern slavery risk, especially when recruiting for lower-skilled or temporary positions in countries where the use of recruitment fees is widespread. In some circumstances, recruitment fees can be used to hold victims in debt bondage, a form of modern slavery. While we do not think it is likely that we would contribute to modern slavery in this area within the meaning of the UNGPs, we recognise that there may be a possibility we could if appropriate risk management steps were not in place (as set out in section 4).</p>
Our investment activities and portfolios.	Medium to high	Directly linked	<p>We invest funds in diverse equities, equity funds, property funds and bonds, among other investments. These investments are managed by an external investment manager. There is a risk that we may be directly linked to modern slavery through these investments. For example, we may invest in equities from a company that is found to have modern slavery in its operations or supply chains.</p>

4 Our actions to assess and address modern slavery risks in our operations and supply chains

This section outlines our actions to assess and address modern slavery risks in our operations and supply chains during the reporting period, including those of our controlled entities. This section is structured to align with the core components of human rights due diligence set out in the UNGPs.

A) STRENGTHENING OUR POLICIES AND GOVERNANCE PROCESSES

Strong governance and clear internal accountability are key elements of our response to modern slavery. Our policy documents and governance processes clearly express and reflect our commitment to combating modern slavery.

A detailed overview of our governance framework is set out in section 2 of this statement.

Figure 3 on page 16 summarises how our governance framework applies to modern slavery. Table 3 on page 17 provides an overview of how we manage modern slavery risks by engaging with our suppliers across the supplier lifecycle.

More broadly, in line with our commitment to best practice in corporate governance, CPA Australia has adopted the 4th edition of the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (CGPR) released in February 2019.

The CGPR defines social risks as including modern slavery. CPA Australia is an unlisted public company limited by guarantee (Company) and is not formally required to report against the CGPR. We choose to do so as a benchmark to best practice and we have implemented these Principles as far as they are relevant to us as a membership-based organisation.

MODERN SLAVERY INCIDENTS

In 2024, we did not identify any modern slavery incidents in our supply chains and operations. However, we recognise that modern slavery may be hidden in our supply chains and operations.

We will continue to take action to assess and address our modern slavery risks and equip ourselves to respond to any future cases of modern slavery that we may identify in our operations or supply chains.

HUMAN RIGHTS POLICY

This policy publicly sets out our commitment to respect human rights and is the foundation for our work on modern slavery. It sets out the key actions we are taking to meet our commitment to respect human rights, including:

- working to enable the safe reporting of human rights concerns (including in relation to modern slavery) by relevant stakeholders without retaliation, including our people, contractors, members, suppliers and their workers
- implementing policies and processes to support us to identify and prevent or mitigate actual and potential human rights risks, including modern slavery
- recognising our responsibility to provide for or cooperate in remediating human rights harm we identify we have caused or contributed to (which could include modern slavery)
- communicating this Policy and our expectations to CPA Australia's people and other relevant stakeholders and sharing information with external stakeholders about our human rights performance, including through reporting such as this statement.

The Human Rights Policy complements and works in tandem with other initiatives across our business relevant to human rights, such as our Reconciliation Action Plan, ESG strategy, Net Zero Emissions Pathway and modern slavery reporting.

The Policy also supports provisions in our procurement policy which set out that we will verify compliance with applicable legal requirements through the procurement process, including those relating to human rights and environmental impacts.

The Human Rights Policy applies to anyone who is employed by CPA Australia and its related entities or works for, or on behalf of CPA Australia, including employees (whether permanent, fixed-term or temporary), contractors, consultants, secondees and Directors and officers wherever located.

Our Human Rights Policy is available on our website.

Figure 2: our policies and governance processes



TABLE 4: COMPONENTS OF OUR APPROACH TO MANAGE MODERN SLAVERY RISKS.

Mechanism	Supplier Type included	Actions	What we've done
Supplier Assessment Questionnaire (SAQ)	Higher Risk	Completed by all new suppliers identified as posing higher modern slavery risks.	The SAQ includes a series of tailored questions for suppliers about their modern slavery and broader human rights risk management. To complement the SAQ we have developed guidance to support suppliers by explaining each SAQ question, outlining expectations for small and large suppliers, and identifying free resources and tools
Master Services Agreement	All	Sets clear contractual requirements for suppliers in relation to modern slavery.	The agreement includes a specific modern slavery and human rights clause, covering issues such as training, prohibiting recruitment fees, and access to grievance mechanisms. The MSA also enables CPA Australia to require a higher risk supplier to prepare and implement a Modern Slavery Risk Management Plan. Our short-form master services agreement is published on our website so that future suppliers can clearly understand our expectations in relation to modern slavery
Supplier Code of Conduct	All	Sets clear expectations for all suppliers in relation to modern slavery risk management and other responsible business practices.	<p>Our code, launched in 2022, requires all suppliers to prohibit modern slavery in their operations and supply chains and provide fair remuneration and working conditions. It also requires suppliers to put in place policies and processes to allow for the safe and anonymous reporting of misconduct, which could include modern slavery.</p> <p>Where our prospective or current suppliers do not meet these standards, CPA Australia may choose to not work or continue to work with those suppliers, although our preference is to work with suppliers to address any relevant issues.</p> <p>We continue to regularly review the Code, including through the consideration of feedback we may receive from our suppliers. We are also continuing to consider ways we can further increase supplier awareness and understanding of the Code. This includes discussing the Code with suppliers during contract management meetings to help identify any challenges with implementation and better understand the actions our suppliers are taking.</p>
Supplier Deep Dives	Higher Risk	Higher risk suppliers may be selected for targeted modern slavery deep dives, involving an extended SAQ.	Refer to our deep dive on page 17 of this report.
Business Reviews	All	We conduct business reviews with suppliers and include ESG as a standard agenda item.	

B) IDENTIFYING AND ASSESSING OUR MODERN SLAVERY RISKS

We are continuing to build our understanding of our modern slavery risk profile (including supplier-specific risks) by engaging with selected suppliers.

We consider a range of factors, like:

- the use of labour hire in the delivery of the goods and services (including the employment of vulnerable people)
- whether the supplier has complied with the MSA and will comply with CPA Australia's modern slavery contractual terms and conditions

- action taken/planned to tackle modern slavery and other potential human rights risks that may be relevant to the organisation
- the supply chains involved in the delivery of the proposed services, as well as provision of training on modern slavery and/or broader human rights issues for relevant workers, such as personnel with responsibility for managing contracts.

We also review the above range of factors from an audit perspective, as we are aware that any modern slavery actions and disclosures should, over duration in time, be able to stand up to third-party scrutiny and assurance.

CONTINUING TO IMPLEMENT THE SAQ

During the reporting period, we continued to implement the SAQ. We recognise that the SAQ can have limitations (for example, in some circumstances it can be difficult to verify information provided by a supplier). However, as a comparatively smaller reporting entity, the SAQ provides us with a valuable tool to understand and assess supplier-specific modern slavery risks.

Whilst our current SAQ focuses on identifying potential modern slavery and broader human rights risks through a series of targeted questions, the questions included have been broadened to encompass all ESG factors. The modern slavery related questions address a range of topics, including the supplier's current modern slavery risk management actions and how the supplier would respond to an allegation of modern slavery or substandard working conditions in its operations or supply chains.

During the reporting period, we requested that any new suppliers identified as posing higher modern slavery risks complete the SAQ as part of the Approval to Proceed step in our procurement process (refer to page 17).

An alternate version of the SAQ has been developed for our international suppliers. This version of the SAQ focuses on questions around available policies in regard to modern slavery and human rights, types of employment (permanent, seasonal, contract), location, fair working conditions, minimum wage payments and fair work conditions. The SAQ is in 'plain English' to simplify the completion process for suppliers and facilitate more informed responses.

From our international engagements, we have recognised the need for greater awareness around modern slavery with some suppliers. We will continue to provide guidance and support to our suppliers and our members in line with our commitment to respect human rights.

DEEP DIVE: EDUCATION SERVICES PROVIDER

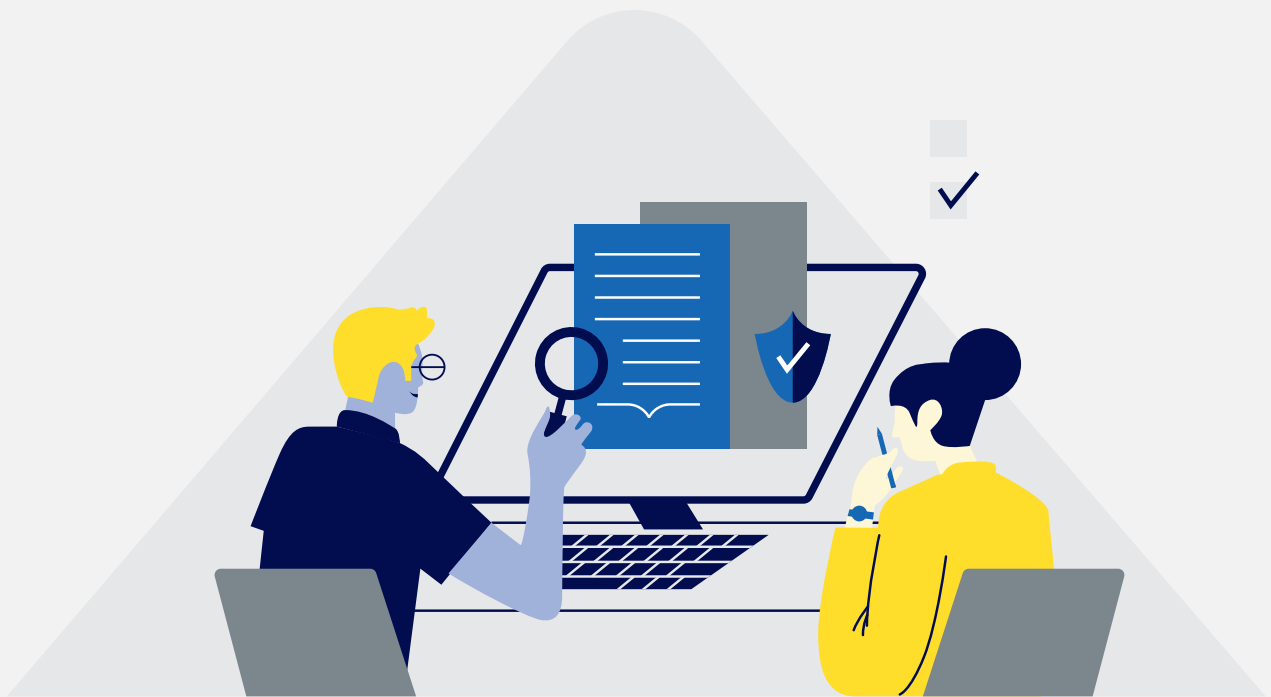
In 2024, we engaged with an education services supplier to better understand how they manage modern slavery risks associated with their extended supply chain.

We commenced the deep dive by requesting a response to an extended version of our SAQ. The deep dive allowed us to better understand the supplier's risk management processes and provided us with an opportunity to engage further and share learnings. This process indicated that our supplier has a comparatively mature governance framework to support it to identify, assess, and address potential risks of modern slavery within its operations and supply chains.

The education services supplier indicated it has taken a range of steps to address modern slavery and broader human rights risks within its operations and supply chains. This includes developing a Business Partner Code of Conduct which addresses human rights and other relevant policies including a Raising Concerns and Anti-Retaliation Policy, and a Responsible Procurement Policy, which sets standards for suppliers around issues such as forced labour and working hours. The supplier has also published a stand-alone Human Rights Statement in addition to its reporting under the UK Modern Slavery Act.

In addition to the policies outlined above, the supplier reported it undertakes risk assessments for selected suppliers through a third party platform, which include consideration of labour rights issues. It also requests relevant paper and print suppliers to sign up to a third party project that among other actions facilitates sharing of supplier audit reports.

Looking ahead, the education services supplier indicates it plans to continue monitoring high-risk suppliers and conduct a 'Human Rights Impact Assessment' for higher-risk categories.



Engaging with the external investments manager to better understand how modern slavery risks relating to our investments are managed

As outlined in section 3, there is a risk we may be directly linked to modern slavery through our investment activities.

In 2024, we continued to engage with our external investments manager to better understand how they are managing modern slavery risks.

The external managers presented to the Board in March, May, September and December.

During these presentations, the degree to which ESG matters generally are captured within our investment portfolio was highlighted, including those underlying funds that have an ESG policy in place, those that are a signatory to the United Nations Principles for Responsible Investment and those that have exposure to defined high risk industries.

The presentation in September 2024 had a particular focused analysis on ethical investment processes in place and CPA Australia's current exposure.

C) INTEGRATING AND ACTING ON OUR FINDINGS

The steps in Table 5 outline how we are continuing to take concrete steps to integrate and act on our risk assessment findings. In addition to the new actions outlined below, we are continuing to implement key actions described in our previous statements.

TABLE 5: ACTING ON OUR FINDINGS

Continuing to embed modern slavery risk considerations in our major procurement and sourcing projects valued at more than \$250,000 through the inclusion of modern slavery questions in relevant tenders and request for proposal document.

For example, during the reporting period we included modern slavery questions in our Request for Proposal (RFP) process for all services. The questions relate to social procurement and modern slavery and environmentally responsible procurement. Suppliers' responses to these questions were weighted as part of the overall tender assessment score.

Continuing to require mandatory consideration of modern slavery risks for all procurement valued at over \$25,000. As part of the contract process, an Approval to Proceed form must be completed for contracts with a value greater than \$25,000. The form asks the contract manager to indicate whether modern slavery risks have been identified before engaging the supplier and provides practical examples of modern slavery risks. If any risks are identified, the contract manager must contact our Procurement team to obtain our SAQ and additional guidance regarding modern slavery in the procurement process.

Continuing to use modern slavery clauses in our contracts. Among other things, the clauses require suppliers to acknowledge that CPA Australia is committed to complying with the MSA, and to warrant that the supplier has no knowledge of any risk of modern slavery offences within its organisation or supply chains and is taking reasonable steps to prevent the occurrence of modern slavery.

Continuing to provide modern slavery training to employees. As part of our training compliance program, employees, the Board and contingent workers are required to complete compliance learning modules relating to modern slavery and broader human rights issues including fraud, whistleblowing and workplace bullying.

Although the number of course modules and makeup differs between the three audiences, modern slavery is a requirement across all three.

MODERN SLAVERY CLAUSES

During the reporting period, we continued to use modern slavery contract clauses to set clear expectations and requirements for our suppliers in relation to modern slavery risk management. Among other things, the clauses require each supplier to represent and warrant that it and its related persons comply with all applicable laws, rules and regulations relating to ethical and responsible standards of behaviour including those dealing with human rights and modern slavery, and that it has no knowledge of any risk of modern slavery offences within its business, organisation or supply chains and is taking reasonable steps to prevent the occurrence of modern slavery.

The MSA also enables CPA Australia to require a higher risk supplier to prepare and implement a Modern Slavery Risk Management Plan. Our short-form master services agreement is published on our website so that future suppliers can clearly understand our expectations in relation to modern slavery.

If a supplier's performance relating to modern slavery is below standard during the term of an engagement, we would seek to engage positively with the supplier and use our leverage as a customer to address the issue in line with the UNGPs, prior to considering termination rights.

EXPANDING MODERN SLAVERY-RELATED TRAINING FOR OUR MEMBERS IN AUSTRALIA AND OVERSEAS

As part of our commitment to supporting members we will continue to drive engagement with our ESG related learning modules aimed primarily at the SME and Public Practitioner market. The content modules sit within the My Firm, My Future eLearning suite of products which can be accessed on our website.

The dedicated modules within the My Firm, My Future eLearning suite of products focuses attention on four considerations:

- ESG and business strategy
- ESG in practice
- ESG measurement, reporting and assurance
- Supply chain resilience.

The modules continue to provide members with an understanding of modern slavery and its implications for business, including modern slavery reporting legislation. In 2024, we reviewed the 'Creating value through sustainability' micro-credential. Modern slavery considerations formed a critical part of the review of the product.

D) TRACKING THE EFFECTIVENESS OF OUR ACTIONS

We are tracking the effectiveness of our response to monitor how the steps we are taking are impacting our risks.

Holding meetings of our Social Working Group

Our Social Working Group is the primary way we track the effectiveness of our response to modern slavery risks.

During 2024, the Social Working Group met to consider our response, and track and review our progress. Further information about how we measure the effectiveness of our actions to assess and address modern slavery risks is set out in section 4.

E) COMMUNICATING OUR PROGRESS

We are sharing our progress and actions with members and the public to ensure we remain accountable for how we address our modern slavery risks.

Developing and publishing our 2024 Modern Slavery Statement

Our statement is the primary tool we use to communicate with members and the public about the steps we are taking to combat modern slavery.

The President's Report in CPA Australia's 2024 Integrated Report highlighted the release of our fourth Modern Slavery statement.

We have a dedicated webpage about our response to modern slavery, which includes a copy of our 2020 through to 2024 statements, this will also house future statements.

We communicated our progress in our 2024 Integrated Report and our 2024 Corporate Governance Statement highlighted the release of our fourth Modern Slavery Statement and continued commitment to deliver on our modern slavery roadmap to our members and external stakeholders

F) REMEDIATION

The below outlines how we are working to equip ourselves to respond to, and (where appropriate and in line with the UNGPs) remediate, cases of modern slavery we may identify in the future.

Whistleblower Policy

Our Whistleblower Policy specifically includes causing, contributing to, or directly being linked to modern slavery (defined broadly as all forms of human trafficking, forced labour and slavery-like practices) in supply chains or operations as conduct that could be reportable conduct.

The Whistleblower Policy is a key component of our risk and corporate governance framework and sets out the framework for receiving, investigating and addressing allegations of reportable conduct (including modern slavery) concerning the activities of CPA Australia, current and former Directors, officers, agents, employees and contractors.

A whistleblower is anyone who makes, or attempts to make, a report of reportable conduct under the Whistleblower Policy, and is, or has previously been, an officer, employee, supplier of goods or services or an associate of CPA Australia or is a relative or dependent of such persons.

A whistleblower has a number of channels to make a report and may make a report anonymously via CPA Australia's external and independent whistleblowing service provider 'Your Call'. This allows for a report to be made anonymously and confidentially.

Whistleblowers are not required to identify themselves and will not be named in any report to CPA Australia unless they have consented in writing to their identity being disclosed.

Fraud and Corruption Policy

Our Fraud and Corruption Policy is also a key component of our risk and corporate governance framework.

It sets out how we establish and maintain an organisational culture that will ensure effective fraud and corruption prevention is an integral part of our day-to-day operations in all countries where CPA Australia operates.

CPA Australia is committed to maintaining a robust culture of integrity and ethical behaviour and will not tolerate fraud or corruption within any part of the organisation whether in Australia or elsewhere.

Our Fraud and Corruption Policy includes causing, contributing to or being linked to modern slavery as an example of a close link to corruption or fraud.

We will review any reports of fraud and corruption involving suppliers for potential links to modern slavery.

5 Member engagement and collaboration

Collaboration is the key to addressing modern slavery risks because it promotes best practice and idea sharing. In 2024, as in past years, we continued to work closely with members and the broader profession to foster action to combat modern slavery.



Our key actions to engage with members and collaborate with stakeholders during the reporting period included:

- launch of our new ESG micro credentials. Our updated micro-credentials align our member support along three components: Setting the ambition for sustainability, effecting action to enable the business transformation and reporting and assurance as a tool to ensure accountability
- our ESG Centre of Excellence also produced a checklist for Boards that span across all aspects of sustainability (including modern slavery)
- launching an ESG reference guide, that provides a glossary and examples of key sustainability concepts including modern slavery.

UNITED NATIONS (UN) SUSTAINABLE DEVELOPMENT GOALS (SDGS)

In 2015, all 193 Member States of the UN agreed the 2030 Agenda for Sustainable Development, which resulted in 17 SDGs that reflect global sustainable development priorities.

CPA Australia considers the SDGs in its reporting on ESG issues, including our Modern Slavery Statement which supports UN SDG 8.

	UN SDG Description	How we impact
	Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.	We do this through our education and knowledge offer which spans the CPA Program, our CPD offer and the wide range of content we make available to members.
	Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.	We do this by supporting our members in the work they do that impacts their organisations and the economies they work in, and by providing a workplace that values inclusion and diversity.

MODERN SLAVERY AND ETHICS

As a member-based organisation, we are committed to supporting and equipping members with the tools to take action to address modern slavery.

Accountants have a key role to play in supporting businesses to combat modern slavery. They must be able to recognise it as a risk to businesses' financial sustainability, support the identification and mitigation of modern slavery risks linked to procurement spend, and assure businesses' modern slavery responses.

Taking action on modern slavery is also consistent with accountants' responsibility to act in the public interest under the APES 110 Code of Ethics for Professional Accountants. This includes compliance with relevant laws and regulations, including those in relation to modern slavery.

In this context, APES 110 emphasises the wider public interest of compliance with laws and regulations, including the potential harm to investors, creditors, employees and the general public.

CASE STUDY: FRESHLY BAKED

Background

A large supermarket group has decided to assess their value chain for the risk of instances of modern slavery.

As part of the process the finance and procurement teams have decided to look at the most material suppliers and have narrowed their scope to providers of baked goods, which is produced off-site, packaged in branded material and then shipped to the central distribution centre.

One bakery, which employs a similar number of employees to their competitors, has evidenced substantially lower wage bills and recent irregular shipment.

Concerned that the problem may not only be due to financial difficulties, the finance team decide to include questions about modern slavery and engage directly with the bakery in question.

The request is met with substantial resistance from the bakery owner. Upon finding out that the bakery is under scrutiny, several employees come forward with concerns about the wages they receive and the hours that they are required to work.

It also becomes evident that the majority of the workers are migrants to the country.

The supermarket decides not to cease their sourcing from the bakery, but to place the owner on notice that he may be subject to further scrutiny.

Several months later, an independent investigation by the Police, acting on an anonymous tip finds that the workers have had their passports confiscated, were required to live in squalid conditions and were grossly underpaid.

The above example evidences forced labour which is a form of modern slavery.

Key points

Financial irregularities are often indicative of broader issues within organisations. In this case study, the underpayment of workers, although financially beneficial to the supermarket chain, may have posed reputational risk in the future had pre-emptive actions not been taken.

6 Assessing the effectiveness of our actions.

Tracking the implementation and impact of our actions to combat modern slavery risks is a key part of our response to modern slavery.

This monitoring and assessment helps us understand what works and where further action is needed.

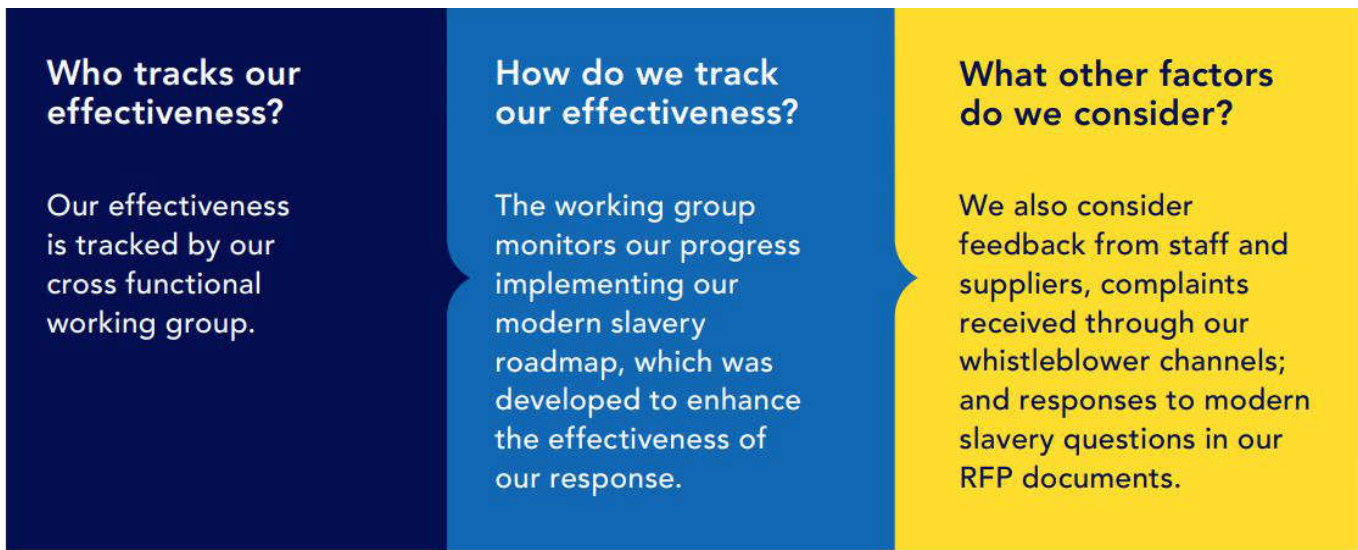
We recognise that assessing the effectiveness of actions in a modern slavery context is challenging. For example, tracking quantitative metrics relating to numbers of people trained or suppliers engaged may not provide a clear indication of whether these actions are having a meaningful impact. In this context, we are working to continue to strengthen our approach to assessing effectiveness as outlined in Figure 4.

Importantly, we recognise that the ultimate goal of an effective response to modern slavery risks should be to support changes on the ground in the lives of those who may be subjected to or who have survived modern slavery, and not just on changes to the organisation’s risk profile.

Figure 3: How we understand effectiveness



Figure 4: How we track our effectiveness



7 Our future plans

In 2024, we consolidated our modern slavery response, following the implementation of our three-year road map from 2021 to 2023.

As we look to 2025, we have identified the following key areas of focus for our work.

OUR KEY FOCUS AREAS

- Engaging with members through a global ESG webinar series, which will include a focus on modern slavery and other social impact issues
- Engaging with external stakeholders to promote action by the accounting profession to address modern slavery risks, including a planned virtual presentation to Indonesian stakeholders
- Contributing to the Australian Government request for consultation on the proposed amendments following the review to the MSA
- Exploratory work on identifying a system solution for data management and reporting, with the main focus areas being greenhouse gas emissions data and modern slavery risk management information from our suppliers

Figure 5: 2022-27 strategic goals



Patrick Viljoen FCPA,
Sustainability Lead,
CPA Australia

"CPA Australia recognises the dynamic nature of the sustainability landscape and the increased requirement for the finance profession to play its part in the transition to a more sustainable future.

Our new sustainability micro-credentials provide our members with a pathway to navigate sustainability. We have structured our offering around three dimensions, leadership, business transformation and external reporting and assurance."



8 How we consulted with our controlled entities to prepare this statement

The Boards of our controlled entities understand our expectation that they act in accordance with our values, standards, policies and procedures including those relating to modern slavery and broader human rights issues.

Some of the Board members of our controlled entities also have day-to-day management roles at CPA Australia and therefore have an operational understanding of the steps we are taking to reduce the risk of modern slavery.

This includes knowledge in our operations and supply chains and how these actions relate to our controlled entities.

For example, one Director of CPA Australia (Shanghai) Co. Ltd. was also a member of our Social Working Group.

Developing this statement through our Social Working Group allows us to consult with key business functions on the statement, including Policy and Advocacy, People and Culture, Global Member Experience, Company Secretary and General Counsel, Finance Operations (including Procurement, Property and Facilities) and International.

These functions have responsibilities in relation to CPA Australia as well as our controlled entities, which further strengthened our consultation process.

Collaboration and consultation are key to our values, in particular our value of achieving together.

THE CPA AUSTRALIA WAY



Our organisational values under the umbrella 'The CPA Australia Way' are:

- Create opportunity
- Pursue excellence
- Achieve together.

The CPA Australia Way is the heartbeat of our organisation. It represents the fundamental beliefs and principles that drive how we deliver on our strategy.



Appendix

Mandatory requirements under
Australia's *Modern Slavery Act 2018*

(Cth) and the UK's *Modern Slavery Act 2015*.

Australia's <i>Modern Slavery Act 2018</i> (Cth) mandatory reporting criteria	UK's <i>Modern Slavery Act 2015</i> recommended reporting criteria	Statement section addressing this requirement
Mandatory criterion one: Identify the reporting entity.	Organisation's structure business and supply chain.	Section 1: About this statement
Mandatory criterion two: Describe the structure, operations and supply chains of the reporting entity.		Section 2: Our structure, operations and supply chains
Mandatory criterion three: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	The parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	Section 3: Our modern slavery risks
Mandatory criterion four: Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Organisation's policies in relation to slavery and human trafficking, its due diligence processes in relation to slavery and human trafficking in its business and supply chains; and the training about slavery and human trafficking available to its staff.	Section 4: Our actions to assess and address modern slavery risks in our operations and supply chains
Mandatory criterion five: Describe how the reporting entity assesses the effectiveness of such actions.	Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Section 6: Assessing the effectiveness of our actions
Mandatory criterion six: Describe the process of consultation with any entities that the reporting entity owns or controls.	N/A	Section 8: How we consulted with our controlled entities to prepare this statement
In the case of a reporting entity covered by a statement under section 14 of the MSA - the entity giving the statement.		
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A	Section 5: Member engagement and collaboration Section 7: Our future plans