



MODERN SLAVERY

STATEMENT 2025

FROM THE Chairman and CEO OF KPMG AUSTRALIA



Martin Sheppard
National Chairman



Andrew Yates
Chief Executive Officer

KPMG acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of Australia. We pay our respects to Elders past and present as the Traditional Custodians of the land, water and skies of where we work.

We are proud to present KPMG Australia's sixth annual statement detailing our firm's actions to identify and address modern slavery risk. This statement was approved by our National Executive Committee (NEC) and our Board in August 2025.

This year was a significant period for Australia's modern slavery response. In December 2024, the Federal Government provided a comprehensive response to the statutory review of the Modern Slavery Act. We welcomed the Government's support for reforms to improve action and accountability under the Act, and its recognition of the importance of due diligence frameworks to identify, prevent, and manage modern slavery risks.

The appointment of Australia's first Anti-Slavery Commissioner was another milestone, and provided much-needed momentum for our country's anti-slavery movement as compounding global crises – including economic uncertainty, armed conflict, and displacement resulting from climate change – place people at further risk of exploitation.

All sectors and organisations have a role to play in addressing the root causes, manifestations, and consequences of modern slavery. At KPMG Australia, we continue to evolve our response across several areas.

This year, we supplemented our Supplier Risk Management Framework by implementing a supply chain technology tool to streamline modern slavery risk assessment. Data insights from this platform have provided us with a more nuanced view of the risk areas in our supply chain, providing a foundation for constructive dialogue with suppliers.

Since KPMG Australia established our modern slavery response, we have invested in stakeholder engagement to promote innovation and knowledge-sharing in a range of forums. This year, we engaged with not-for-profit, private sector and government stakeholders, and provided pro bono support to a not-for-profit organisation developing a program aimed at elevating the voice and influence of modern slavery survivors.

Combating modern slavery is an ongoing challenge that requires commitment, collaboration, and reflection. We are pleased to share in this statement our firm's commitments for the next 24 months, in line with our continuous improvement approach to modern slavery due diligence.



At a glance

KPMG is an Australian partnership. This statement is made on behalf of KPMG and its associated entities (KPMG Australia) including KPMG Financial Advisory Services (Australia) Pty Ltd, KPMG Holdings (Australia) Pty Ltd, KPMG Investments (Holdings) Pty Ltd, KPMG Australia Technology Solutions Pty Ltd, and KPMG Australian Services Pty Ltd as trustee for KPMG Australian Service Trust. This report covers KPMG Australia, KPMG Fiji and KPMG PNG.

Our commitment

This is our sixth statement made in fulfilment of the requirements of the *Modern Slavery Act 2018* (Cth). KPMG Australia's response to modern slavery risk is an example of our broader commitment to respect and promote human rights across our operations and supply chain.

Key developments this year include refining our modern slavery risk areas, reviewing and raising awareness of our grievance mechanisms, delivering tailored training to supplement our human rights and modern slavery e-learning module, and engaging with a broad range of stakeholders to support collective continuous improvement in modern slavery responses.

We onboarded 544 suppliers to our cloud-based modern slavery risk assessment platform, reflecting our strategic reassessment of all existing medium- and high-risk suppliers. We also undertook deeper due diligence of selected goods and services in our supply chain.

Reviewing our modern slavery risk profile

An important element of our modern slavery response is the annual review of our modern slavery risk areas. For this year's review, we utilised a new tool developed by our ESG Social team (formerly KPMG Banarra), in addition to interviews and document collection with internal stakeholders. An outcome of this review was the identification of 10 areas of elevated inherent modern slavery risk across our operations and supply chain. These areas are defined at page 9 of this Statement and have shaped the forward commitments set out at page 22.

Tracking the impact of our actions

KPMG Australia's Modern Slavery Measurement and Evaluation (M&E) framework is focused on the three key impact groups in our modern slavery theory of change: suppliers, alliance partners, and contractors; clients; and our people. The M&E framework helps us determine whether policies are being implemented optimally, ascertain effectiveness, and drive continuous improvement. This year, the firm's Human Rights Working Group and National Executive Committee reviewed qualitative and quantitative data from the framework on a six-monthly basis. Indicator data from the framework is included at page 20 of this statement.

Building our human rights and modern slavery capability

We are committed to providing our people with the skills and knowledge to effectively consider human rights and modern slavery risks that intersect with their day-to-day work responsibilities. This year, 2,204 people completed our human rights and modern slavery e-learning module, bringing the total of completions to date to 6,390. Our in-house human rights experts delivered additional bespoke training and capability building to over 300 people across KPMG Australia, KPMG Fiji, KPMG PNG, and offshore vendors during the year.

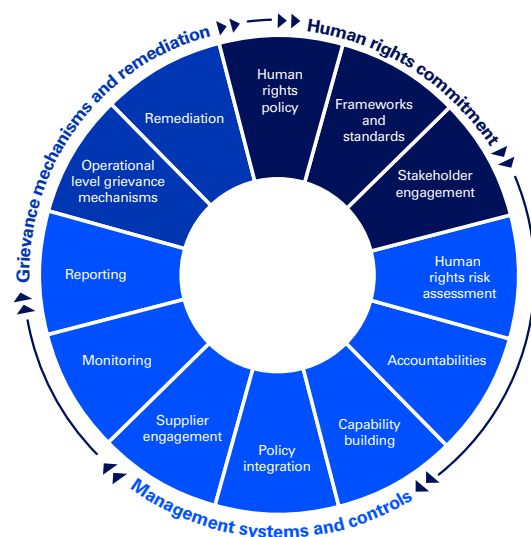
Mandatory reporting criteria in the Modern Slavery Act

This table outlines where each criterion in the *Modern Slavery Act 2018* (Cth) is addressed within this statement.

Modern Slavery Act 2018 (Cth) criteria		Page reference
Identify the reporting entity		3
Describe its structure, operations, and supply chains		6 – 7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls		8 – 11
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes		12 – 18
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks		19 – 20
Describe the process of consultation with any entities the reporting entity owns or controls		21
Provide any other relevant information		22



FY25 actions



Actions undertaken to meet the commitments from our previous Modern Slavery Statement are summarised below, with further detail provided in the section 'Our actions to address modern slavery risk'. Our forward commitments for the next reporting period are set out at page 22 of this statement.

FY24-FY25 commitments

Status	Modern Slavery Statement page reference
Human rights commitment	
Refresh the firm's modern slavery stakeholder engagement plan and carry out at least 10 engagements annually with stakeholder groups in the plan.	✓ 2025 Modern Slavery Statement: 3, 6, 13, 16, 21. 2024: 5, 20-21
Operationalise the firm's Human Rights Action Plan and set targets to assess progress meeting the commitments in the plan.	✓ 2024: 13
Contribute to the Parliamentary Inquiry into Australia's Human Rights Framework.	✓ 2024: 20
Provide support to civil society initiatives in our region focused on the firm's salient human rights issues, including labour rights.	✓ 2025: 16, 21 2024: 21
Management systems and controls	
Conduct a periodic review of the firm's Supplier Risk Management Framework.	✓ 2025: 13 2024: 15
Supplement the Supplier Risk Assessment Framework with additional modern slavery assessment of selected high-risk products and services, focusing on multiple tiers of the supply chain.	✓ 2025: 13, 14 2024: 14

Collaborate with KPMG PNG and KPMG Fiji to support them in further maturing their modern slavery response in relation to supply chain, governance, and operations.	✓ 2025: 15 2024: 15
Continue to enhance the modern slavery risk assessment measures in the due diligence process for alliances and acquisitions.	✓ 2025: 14
Apply a human rights lens to the review and development of firm policies that intersect with our most salient human rights issues, including labour rights.	✓ 2025: 12, 15 2024: 13-14
Promote consistency in the operationalisation of the firm-wide modern slavery risk appetite statement by providing guidance and training on the application of standards in the statement.	✓ 2025: 15 2024: 15
Develop and implement a human rights and modern slavery capability building plan, building on the existing e-learning module.	✓ 2025: 15 2024: 15
Grievance mechanisms and remediation	
Review the effectiveness of the firm's human rights grievance mechanisms in line with good practice guidance from the Office of the United Nations High Commissioner for Human Rights Accountability and Remedy Project.	✓ 2025: 15 2024: 13-14



Our structure, operations and supply chain

About us

We are part of a global organisation of independent professional services firms, with more than 275,000 partners and employees working in member firms across over 140 countries and territories around the world.

We provide professional services to clients across a wide range of industries, government, and not-for-profit sectors. Our service areas are Audit & Assurance, Consulting, Deal Advisory & Infrastructure, Enterprise, and Tax & Legal.

This report covers KPMG Australia, KPMG Fiji and KPMG PNG. KPMG has offices in every state and territory capital within Australia, in addition to several regional locations. KPMG PNG has its office in Port Moresby, and KPMG Fiji has offices in both Suva and Nadi.

Making a positive impact on society

We make a strong economic contribution, employing 8,967 people across Australia, Fiji, and PNG as at 30 June 2025. This includes an intake of 637 graduates during the year. We also appointed 71 new partners and executive directors, bringing the total partnership to 684.

Our ambition is to be the most trusted and trustworthy professional services firm.

We continue to respond to challenges facing our profession and are focused on acting transparently, with accountability and integrity.

We are committed to acting lawfully, ethically and in the public interest. KPMG Australia is subject

to an extensive but often fragmented framework of obligations. Contractual frameworks set by our clients define their expectations and requirements, and are further supported by regulatory and legal obligations, professional standards and codes, and commitments to professional bodies.

Our people are also required to comply with [KPMG's Global Code of Conduct](#) and to meet the expectations of the communities in which we operate. Our Code of Conduct clearly states that we don't tolerate behaviour that is illegal, unethical, or breaches human rights within KPMG or from clients, suppliers or public officials we work with.

As members of Chartered Accountants Australia and New Zealand (CAANZ), all KPMG partners are subject to the Accounting Professional & Ethical Standards Board Code of Ethics for Professional Accountants (APES 110). KPMG personnel also play an active role as members of a diverse range of other professional associations, many of which have clear expectations of the conduct of their members. As such, our people are subject to extensive regulations, requirements, and codes of conduct that require us to maintain high levels of integrity.

Beyond our clients we contribute in voluntary and honorary capacities to assist the wellbeing of the communities in which we live and operate. We work with community partners to help solve challenges through our Community Impact Strategy, our [Reconciliation Action Plan](#) and [Climate Action Plan](#).

KPMG is also committed to positive impact and delivering purpose-led services that help our clients respond to ESG risks. KPMG Australia has an experienced, dedicated human rights and social impact team. We enlist the expertise of this team to shape and challenge the firm’s approach to respecting and promoting human rights and addressing modern slavery risk.

Further information about our firm’s governance framework for overseeing our activities, setting policies, and aligning our strategy with our Purpose is available on the [KPMG Australia](#) website.

Where we operate

The global KPMG network consists of separate independent firms that individually provide Audit, Tax, and Advisory services to a wide variety of public and private sector organisations. KPMG in Australia is a member firm of the KPMG organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. Further details about KPMG International and its business are available in the KPMG International Our Impact Plan: 2025 update.

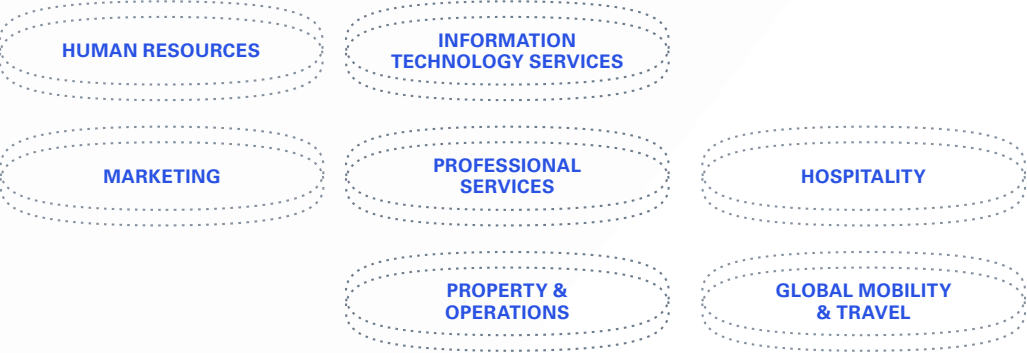
KPMG Australia holds a small number of minority shareholder interests in entities based in Australia. KPMG Australia also holds a very small number of minority shareholder interests in overseas operations, which we co-own with other KPMG firms and which we do not control. These minority interests have not changed in a manner material to this statement over the reporting period.

KPMG Australia also trades in New Zealand through KPMG Technology Solutions (NZ) Pty Ltd, a cyber security firm. This entity largely provides services from Australia but there continues to be a presence in New Zealand.

Where we source

In FY25, the majority of goods and services that we procured came from suppliers based in Australia.

Our major categories of procurement include:



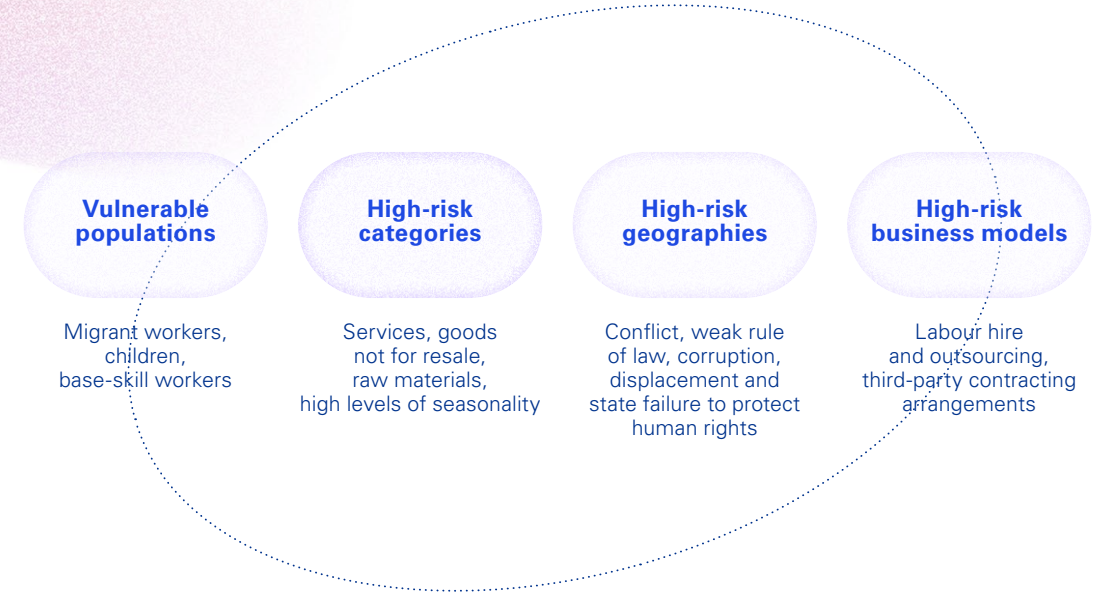
KPMG Australia’s direct overseas supply chain includes eight offshore vendors, the majority of which are in India, with the others in the Philippines, Vietnam, Bulgaria, Malaysia, and Malta.

These vendors provide outsourced IT, tax-related, advisory, and creative services to KPMG Australia. Some of these vendors are owned by one or more KPMG member firms that operate within a global KPMG delivery network.

Our modern slavery risk areas

KPMG Australia considers four key factors that elevate the risk of, or the perception of, the potential for modern slavery. Where multiple modern slavery risk factors coexist, there is a higher potential or likelihood of actual harm being experienced. These four key factors have remained the same from our last statement but will continue to be reviewed annually.

We note that the *Modern Slavery Act 2018* (Cth) defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour refer to situations where children are subjected to slavery or similar practices or engaged in hazardous work.

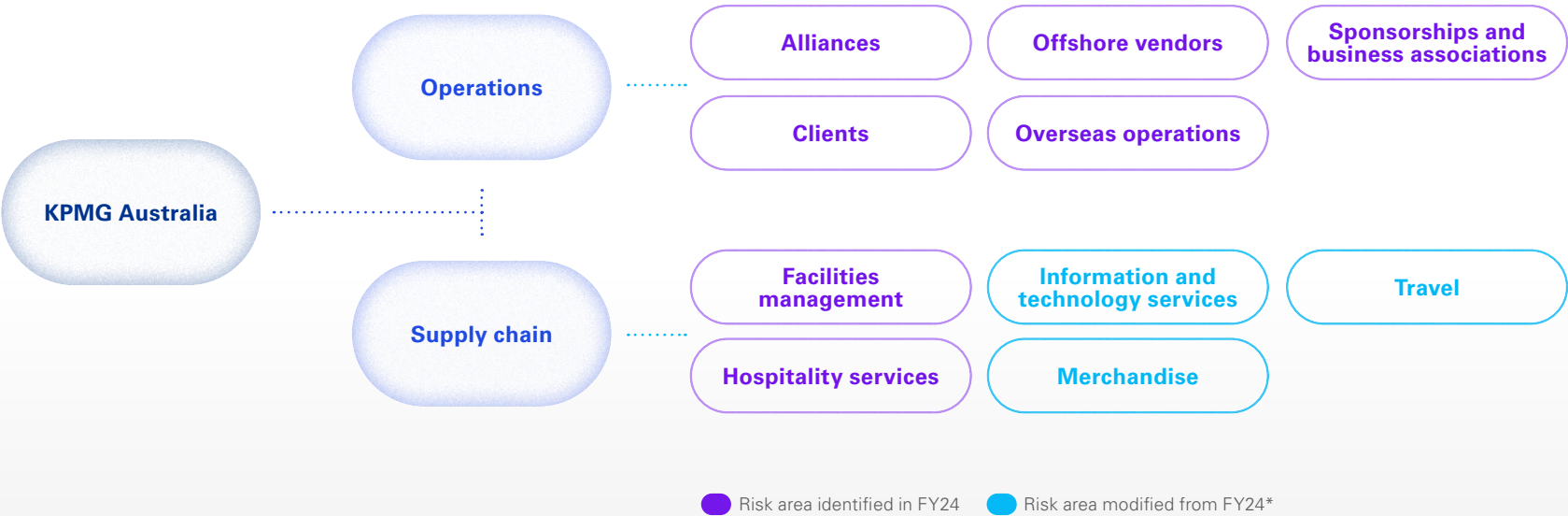


KPMG Australia has not identified any specific instances of modern slavery harm in our operations or supply chain.

Following this year’s modern slavery risk review, we have, however, identified 10 areas as having high modern slavery inherent risk.

For this year’s review, we utilised a risk assessment tool developed by our ESG Social team. This tool prompted us to map out our operations and supply chain and assess whether each area intersects with one or more modern slavery risk factors. Risk ratings were validated through interviews and document collection with internal stakeholders as well as desktop analysis by our in-house human rights experts. The risk review also included consideration of residual risk, taking into account current controls and activities, and potential further next steps to mitigate residual risk.

KPMG Australia’s FY25 risk areas



* Following our FY25 modern slavery risk area review, these items were modified to be identified as standalone risk areas, whereas previously they were incorporated within other risk categories. Definitions of each FY25 risk area are included on the following pages.

Operations

Alliances

Strategic alliances can provide great benefit, allowing KPMG Australia to pool knowledge and resources with another business in a manner which is less binding than a joint venture. These arrangements may, however, present a risk of KPMG Australia being directly linked to modern slavery practices where alliance partners operate in high-risk sectors, or rely on high-risk business models such as subcontracting or outsourcing.

Clients

KPMG Australia’s core business is the provision of professional services to clients. There is a risk of us contributing to, or being directly linked to, modern slavery practices by virtue of the provision of our services to clients that operate in high-risk industries or locations, or engage workers from vulnerable populations such as migrant or base-skill workers.

Offshore vendors

To supplement, diversify or extend the capabilities of its functional teams, KPMG Australia has service agreements in place with eight offshore vendors that provide outsourced IT, tax-related, advisory, and creative services. Most resources are located in India, with others in Vietnam, the Philippines, Bulgaria and Malta. KPMG Australia has identified that the countries in which these offshore vendors operate are at a higher risk of potential modern slavery practices based on their geography and the presence in some cases of high-risk business models, high-risk categories, and vulnerable populations.

Overseas operations

KPMG Australia intersects with several overseas jurisdictions by virtue of entities within its corporate structure. The locations of some of these operations present an elevated inherent risk of modern slavery due to the presence of vulnerable populations and governance challenges. The firm has a responsibility to assess the risks of modern slavery represented by overseas operations and use available leverage to mitigate and prevent identified risks.

Sponsorships and business associations

KPMG Australia will from time to time sponsor events or initiatives led by third parties. KPMG Australia is also a member of a number of business associations, which provides us with an opportunity to collaborate on research, build relationships, and support specific industries or businesses. While sponsorship arrangements and business association memberships have the potential to benefit all parties, they also represent a risk of KPMG being directly linked to modern slavery practices, should the third party be in a high-risk category for modern slavery and lack effective due diligence.

Supply chain

Facilities management

KPMG Australia’s Facilities Management team procures various categories of services including cleaning, mechanical, hydraulics, electrical, information technology, hygiene specialists, commercial kitchen appliances, and installation and maintenance services. These services are often delivered through third-party providers and subcontracting arrangements, which can reduce oversight and control over labour practices. In addition, workers in the facilities management supply chain may come from populations with heightened vulnerability to modern slavery, including base-skilled workers and those from migrant backgrounds, who may have limited awareness of their rights or access to grievance mechanisms.

Information and technology services

Technology hardware – such as laptops, servers and peripheral devices – are procured by KPMG Australia to support its digital infrastructure and day-to-day business operations. Our people also make use of digital tools including software, cloud-based storage, and KPMG Australia’s in-house generative AI agent. The information and technology services category presents elevated modern slavery risks due to its globalised and sometimes opaque supply chains. Several countries with significant ITS industries, including in the Asia-Pacific region, are considered high-risk geographies for modern slavery. The technology supply chain also often operates under ‘just-in-time’ production models and relies on flexible labour, which can result in workers experiencing indicators of forced labour.

Hospitality services

KPMG Australia’s hospitality services team consists of a core group of KPMG employees supported by casual and contingent staff engaged through third-party providers. Where we rely on third-party labour hire, this increases the potential for poor labour practices if we lose visibility over how that labour relationship is managed. This risk may be heightened if workers are from vulnerable backgrounds including migrants coming from low socio-economic, culturally, and linguistically diverse backgrounds, who may face barriers to understanding local labour laws or asserting their rights.

Merchandise

KPMG Australia will often procure promotional or marketing merchandise such as t-shirts, hats, and pens. Without appropriate due diligence controls and processes in place, there is a potential for such goods to be mass-produced at low cost in high-risk geographies, where gaps in labour law enforcement create an environment where forced labour can be present.

Travel

KPMG Australia engages travel and accommodation services to support business operations, including hotels, flights, and other forms of transport. There is a risk of us being directly linked to modern slavery practices through engaging travel service providers that operate in high-risk geographies or have vulnerable workers in their labour supply chain. The risk of modern slavery practices in the travel industry is heightened due to a common reliance on labour hire and outsourcing, the often-transient nature of the workforce, and variations in legal protections and enforcement across jurisdictions – all of which create opportunities for exploitative practices to go unchecked.

Our actions to address modern slavery risk

KPMG Australia's modern slavery response is informed by the *UN Guiding Principles on Business and Human Rights* (UNGPs). We understand that human rights due diligence is an ongoing process, and one which is most effective when it is embedded in the risk and procurement processes of our business.

FY25 actions

Human rights commitment

Policy development and review

KPMG Australia completed a periodic review of our Human Rights Policy during the reporting period. As the first stage in this review, our Human Rights Working Group conducted a literature review of contemporary factors influencing risk of harm to people in the professional services sector. Interviews were then carried out with internal stakeholders and an external business and human rights expert. Internal stakeholders were selected due to their experience and insight into aspects of human rights relevant to the firm's value chain, including privacy, labour rights, Indigenous rights, and health and wellbeing.

A key theme that emerged in stakeholder interviews was the potential for deployment of artificial intelligence to impact human rights. To reflect this finding, the Human Rights Policy was updated to include a new section on the firm's approach to safeguarding human rights during the development and deployment of AI through our [Trusted AI framework](#). The format of the policy was also updated to improve its accessibility.

Resourcing our human rights and modern slavery commitments

The firm's Human Rights Working Group continued to meet during the reporting period to develop and implement the firm's modern slavery response. The working group is a forum for discussing leading practice in addressing challenges and opportunities, and tracks agreed actions against an agreed workplan. It includes representatives from our ESG Social team, People & Inclusion, Risk Management, Procurement, Government and Regulatory Affairs, and Corporate Citizenship. KPMG Australia's Chief Risk Officer and Chief Operating Officer were active participants in, and executive sponsors of, the working group during the year.

This year, our Human Rights Working Group continued to oversee the operationalisation of our Human Rights Action Plan and monitored indicator data on a six-monthly basis to assess progress against the plan.



Human rights commitment

Constructive stakeholder engagement

We continued our engagement with not-for-profit organisations and private sector stakeholders to share knowledge and promote leading practice in modern slavery reporting and response. This included active participation in communities of practice, contributions to forums and conferences, and provision of pro bono support. Further detail can be found at pages 16 and 21 of this Statement.

KPMG Australia welcomed the support for reform outlined in the Federal Government's response to the statutory review of the *Modern Slavery Act 2018* (Cth). We were pleased to contribute a [detailed submission](#) to this review, and look forward to contributing to further consultation prior to implementation of supported recommendations.

Management systems and controls

Due diligence: supply chain

KPMG Australia has a robust Supplier Risk Assessment Framework for assessing and monitoring modern slavery risk in our supply chain. The framework has the following key elements:

- A public-facing Supplier Code of Conduct that sets out our expectations of suppliers and their employees, agents and subcontractors that produce goods and or provide services to KPMG Australia. The code includes specific expectations relating to labour sourcing and modern slavery. This Code was reviewed and updated during the reporting period.
- A Modern Slavery FAQ and Continuous Improvement Fact Sheet provided to suppliers as part of the vendor due diligence process.
- Supplier risk assessment guidance outlining the risk assessment process for our internal Procurement Team.
- A standard questionnaire for new suppliers containing questions linked to the key factors that elevate the risk for modern slavery, or the perception of such risk.
- A Supplier Risk Assessment Tool for use by our Procurement Team.

During the previous reporting period, we added a new element to this framework by rolling out a cloud-based tool to provide added insight into modern slavery risks in our supply chain and facilitate dynamic dialogue between our National Procurement team and our suppliers.

This year we onboarded 544 suppliers to our cloud-based modern slavery risk assessment platform, reflecting our strategic reassessment of all suppliers with a medium to high inherent risk of modern slavery. The case study at page 17 provides further detail on insights we have gained from this platform.

When a supplier is assessed as presenting a higher risk of modern slavery, the National Procurement team engages with the supplier constructively by developing a tailored alignment plan and offering appropriate guidance and resources. Over the past year, our National Procurement team has proactively engaged with suppliers across a range of sectors, including technology & IT services and office supplies to support their ongoing enhancement of modern slavery risk management practices.

As part of our modern slavery risk management framework, we have conducted further due diligence on the procurement of paper products this year. We recognised this category as high risk due to its reliance on offshore manufacturing in regions with elevated vulnerability to labour exploitation, particularly Indonesia and China. The review focused on our primary office stationery supplier, which has been assessed as medium risk under our Supplier Risk Assessment Framework. While our supplier is locally based, the offshore milling of paper necessitates deeper scrutiny. Our due diligence process included a review of sourcing transparency, declarations, and available ethical sourcing certifications.

We are actively engaging with our paper supplier to obtain further information on their upstream supply chain, including the identification of specific offshore mills involved in paper production of the products we purchase, the labour standards those facilities adhere to, and any existing monitoring frameworks. This further due diligence process aims to assess the extent of transparency, evaluate the effectiveness of the supplier's control in preventing modern slavery, and support the implementation of additional risk mitigation measures where necessary.



Management systems and controls (continued)

Due diligence: operations

KPMG Australia's Modern Slavery Risk Appetite Statement emphasises that 'KPMG Australia has no appetite for establishing or maintaining relationships with clients where there is evidence, or a credible allegation, of modern slavery and the client is not taking steps to implement appropriate measures which will mitigate, address, remediate, or prevent future modern slavery related harm.'

KPMG Australia continues to integrate modern slavery and human rights considerations into its client engagement, acceptance, and continuance processes. These controls are designed to identify and assess potential risks related to forced labour and other human rights concerns.

During the reporting period, matters flagged through these processes were escalated to relevant divisional risk leaders and human rights specialists for further assessment. Where appropriate, additional due diligence was undertaken to evaluate the nature and severity of identified risks. In certain cases, decisions regarding client engagements were informed by this assessment process, in line with the firm's Modern Slavery Risk Appetite Statement.

This year, we implemented ongoing media monitoring for all clients that have received a modern slavery risk flag requiring further investigation within the past three years. The purpose of this monitoring is to identify any new developments impacting the client's risk profile in a timely manner, allowing the standards in our Modern Slavery Risk Appetite Statement to be applied prior to the next continuance assessment.

Due diligence: offshore vendors

During FY25, we carried out additional due diligence with a key offshore vendor based in India to gain a deeper understanding of its modern slavery risk profile and opportunities to build maturity.

This due diligence had three key stages. Firstly, the offshore vendor completed a modern slavery risk assessment using our cloud-based tool. Our National Procurement team and Human Rights expert then held an interview with senior leaders from the offshore vendor and requested documents to validate responses in the questionnaire and interview. National Procurement then developed a set of recommended alignment actions for the vendor to take to uplift the maturity of its modern slavery responses. We will continue to engage with the vendor during the next reporting period to support implementation of these recommendations.

Alliances

KPMG Australia's Alliances team has responsibility for the facilitation of the onboarding and management of firm-wide alliances. All proposed alliances are subject to a risk assessment that includes consideration of breaches of labour rights. This year, the firm enhanced its modern slavery due diligence process for alliances by including additional practical information and guidance material to support colleagues in applying our modern slavery risk appetite during alliance risk assessment and onboarding. A tailored human rights and modern slavery update was also delivered to our Alliances team, to supplement the firmwide e-learning module.



Management systems and controls

Capability building

This year, we reviewed and updated our Human Rights and Modern Slavery e-learning module to reflect legal and regulatory developments and updates to the firm's own internal policies and procedures. As of 30 June 2025, 6,390 people across KPMG Australia had completed the training, including 2,204 new completions during the year.

In addition to this specialised module, all staff are required to complete the annual 'We do the right thing – Integrity at KPMG' module, which incorporates content on the firm's commitment to a human rights approach to modern slavery risk management. As of the end of the financial year, 100% of people at KPMG Australia assigned this training had completed it.

KPMG has continued implementing our human rights and modern slavery learning and capability plan. A key focus of this plan is delivering tailored training to teams across the firm, to support implementation of our Modern Slavery Risk Appetite Statement. This year, we delivered bespoke training to over 300 people. This included team members from our Risk Champion Networks and selected teams across KPMG Fiji and KPMG PNG, our Alliances team, and our offshore vendors.

Grievance mechanisms and remediation

Encouraging reporting of concerns

KPMG Australia actively promotes a 'speak up' culture, encouraging our people to report concerns related to misconduct, ethics, or other issues, while ensuring confidentiality and protecting those who raise concerns. This year, we held our first KPMG Ethical Leadership Summit which brought together 250 emerging leaders from offices across Australia to build practical skills in ethical decision-making. Our Ethical Champions Network, which grew to 73 members during the year, provides our people with an opportunity for confidential advice and structured escalation of concerns.

In July 2024, KPMG also became a member of The Ethics Alliance which will support further refinement of our business practices for enduring change.

Further information on KPMG Australia's approach to Ethical Culture can be found in [Our Impact Plan 2025](#).

Reviewing our grievance mechanisms

KPMG Australia is committed to continuously improving our grievance mechanisms to better align with the expectations for effectiveness set out at Principle 31 of the UNGPs. During the reporting period, we carried out a review of the firm's internal Complaint Management Policy, which resulted in a set of actionable recommendations to further enhance its alignment with the UNGPs.



CASE STUDY

Empowering survivor voices to transform modern slavery practices

KPMG Australia is helping The Freedom Hub establish a structured survivor advisory initiative, enabling businesses to directly incorporate survivor-informed strategies into their modern slavery management processes.

The Freedom Hub is an Australian not-for-profit dedicated to ending modern slavery. It focuses on actively supporting survivors through trauma-informed education, life skills, and employment pathways.

Our 2024 Modern Slavery Statement included a commitment to provide targeted support to civil society organisations in our region, including those with a focus on anti-slavery. Using the expertise of our ESG Social team, we supported The Freedom Hub in a pro bono capacity to develop a structured Modern Slavery Survivor Advisory Program.

This program is intended to facilitate and support survivors of modern slavery to provide advice to business on their modern slavery management processes and be remunerated for their contribution. It addresses a crucial need, as it is increasingly recognised that effectively addressing modern slavery risks requires businesses to move beyond compliance and authentically embed the lived experiences and perspectives of survivors into their policies and practices.

To create a meaningful and effective advisory program, the team undertook comprehensive desktop analysis and targeted stakeholder consultations. This included engaging with businesses from a range of sectors and, crucially, survivors of modern slavery that would potentially be participating in the program. Direct input from survivors provided significant insights, underscoring critical considerations such as facilitating survivor agency and fostering internal buy-in across the business.

The engagement culminated in a detailed roadmap to formalise the program, featuring seven essential design considerations, spanning from initial project set-up to managing engagements with businesses, ongoing survivor welfare and ongoing program management and evaluation. The roadmap included 27 recommendations, tailored to ensure practical and effective program design and implementation.



CASE STUDY

A data-driven approach to supplier risk assessment

This year, we continued implementing a cloud-based software platform to streamline modern slavery risk assessment of our suppliers.

KPMG Australia has a diverse supplier base spanning several geographies and sectors. Our robust Supplier Risk Assessment Framework includes a commitment to support our network of suppliers to mature their own modern slavery response.

Last year, the firm supplemented its modern slavery due diligence through onboarding a cloud-based supply chain management platform which aims to streamline and strengthen modern slavery compliance processes for suppliers. This year, we continued to implement this platform, using it to carry out additional modern slavery assessment of suppliers previously rated as medium to high risk for modern slavery. As of 30 June 2025, 544 suppliers have been onboarded through the platform.

Our analysis of data from the platform has provided valuable insights which were incorporated into our annual review of modern slavery risk areas. These findings have informed the development

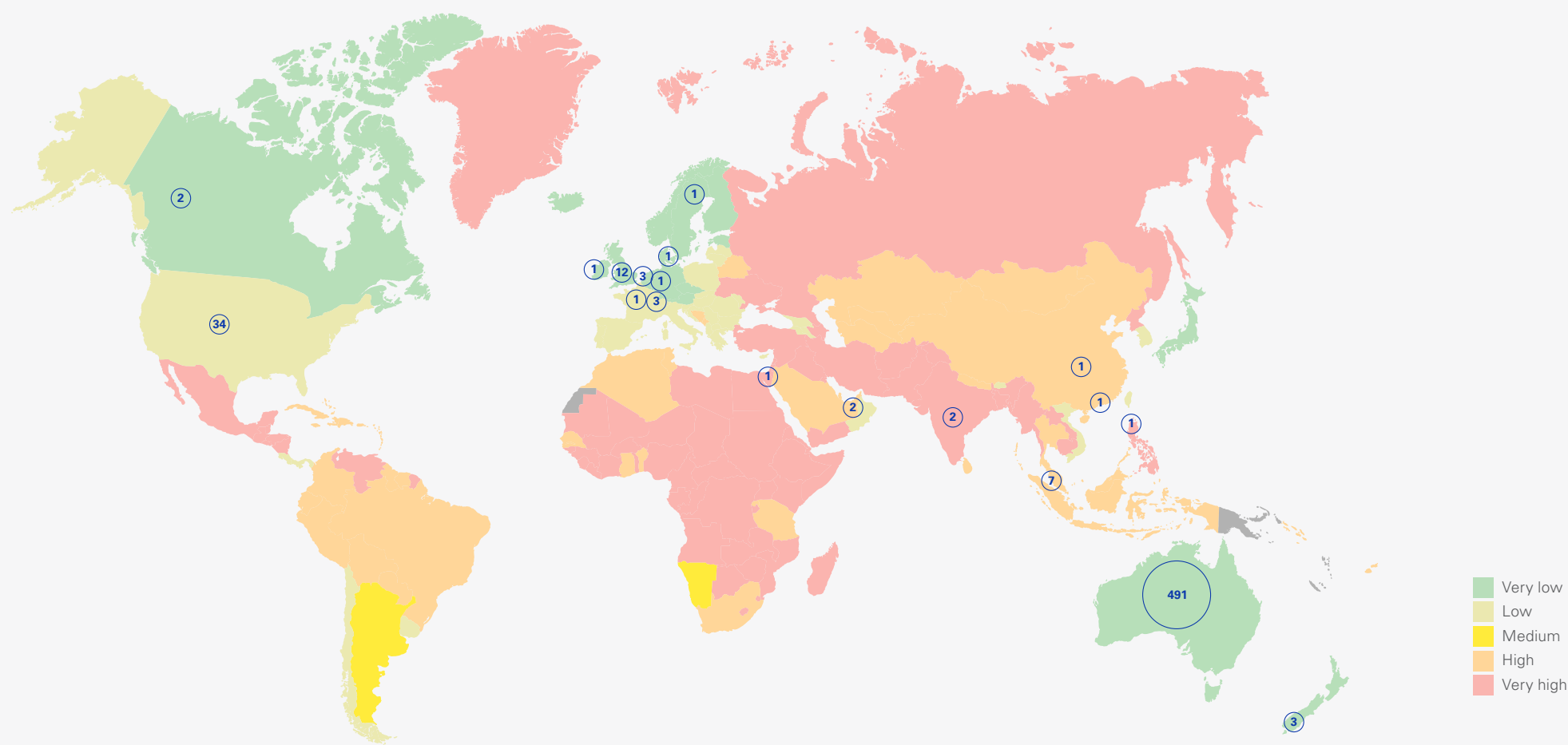
of the forward-looking commitments outlined in this Statement.

The platform's ability to improve the efficiency of the supplier risk assessment and management process enables our procurement professionals to dedicate more time to meaningful engagement with higher-risk suppliers. Through these deeper interactions, we are gaining greater insight into Tier 2 and 3 suppliers, as well as a clearer understanding of existing controls and areas for improvement.

As part of our commitment to ethical sourcing, we have undertaken a mapping exercise of our supplier base assessed in the platform against the suppliers' exposure to modern slavery risks. The assessment indicates that while the majority of our suppliers are located in low-risk countries, approximately 33% operate in medium to high-risk regions, including jurisdictions known for weaker labour protection and higher vulnerability to exploitation.

We have identified a small number of suppliers (less than 1%) in high and very high-risk regions, such as India, the United Arab Emirates, and parts of Asia and Africa, where enhanced due diligence measures have been implemented. High-risk products such as offshore-milled paper from Indonesia and China are being actively monitored, and we are engaging with suppliers to gain greater transparency and ensure appropriate safeguards are in place.

Figure 1: Location of Tier 1 suppliers assessed through KPMG Australia’s digital supply chain tool





Assessing the effectiveness of our actions to assess and address modern slavery

During the reporting period, KPMG Australia continued to collect data to assess our progress against our modern slavery measurement and evaluation (M&E) framework. The Human Rights Working Group reviews data from the framework on a six-monthly basis and adjusts the processes and controls in our modern slavery response accordingly. A summary of the framework data is communicated to the firm's National Executive Committee twice annually.

Our M&E framework focuses on the three key impact groups: suppliers, alliance partners, and contractors; clients; and our people. The table on the next page provides a high-level summary of the long-term impact we target through our modern slavery program, and the indicators we use to track progress towards this long-term impact and intermediate outcomes. Key quantitative metrics from the framework are included in the table for the last two reporting periods, and qualitative data from the framework is incorporated throughout this statement.



Modern slavery measurement and evaluation framework

Impact group	Long-term impact we target	Key indicator	FY24	FY25
Suppliers, alliance partners, and contractors	People who work in our supply chain do not experience modern slavery.	Percentage and number of medium and high-risk suppliers that have completed the residual risk assessment stage of the Supplier Risk Assessment Framework	100% 97 suppliers	100% 165 suppliers
		Number of supplier alignment plans open at the end of the reporting period, and number closed during the reporting period	Alignment plans open: 16 Alignment plans closed: 7	Alignment plans open: 19 Alignment plans closed: 17
		Percentage of contracts with suppliers, contractors and alliance partners executed during the reporting period that include modern slavery terms	Suppliers: 94% Contractors: 100% Alliance partners: 100%	Suppliers: 96% Contractors: 100% Alliance partners: 100%
Clients	Clients manage their modern slavery risks in line with good practice.	Number of human rights and labour rights flags raised through client and engagement risk assessment processes	15	16
		Number of instances where further investigation of risk flag was required	7	6
		Percentage of these instances where the standards in the firm's Modern Slavery Risk Appetite Statement were satisfied	100%	100%
Our people	Our people act with integrity and courage to prevent and address modern slavery.	Number of our people who have completed the KPMG Australia human rights and modern slavery e-learning module	4,186 completions in total 4,005 completions during the reporting period	6,390 completions in total 2,204 completions during the reporting period
		Percentage of staff who have completed 'We do what is right: Integrity at KPMG' training module	100%	100%
		Total number of modern slavery related complaints received via a grievance mechanism	0	0



Consultation, collaboration, and progress against commitments

Good practice consultation with owned or controlled entities

During the reporting period, KPMG Australia engaged and consulted with all entities we own or control. We shared details of our modern slavery commitments and expectations, key risk areas, and provided opportunities for dialogue and knowledge-sharing.

In FY25, KPMG Australia continued to support KPMG PNG and KPMG Fiji to further mature their modern slavery response in relation to supply chain, governance, and operations. This included hosting practical training sessions focused on good practice modern slavery due diligence across supply chain and operations. During FY26, KPMG Australia will collaborate further with these offices as they uplift their modern slavery response.

Engagement and collaboration

KPMG Australia has deep and diverse subject matter expertise in human rights risk management, and we are committed to contributing to relevant forums and policy development bodies.

This year, we continued our active involvement in the UN Global Compact Network Australia (UNGCNA) Modern Slavery Community of Practice. Our people also spoke at forums in Australia and internationally on modern slavery and human rights due diligence. And we contributed submissions and thought leadership on human rights issues including [gender equality in the workplace](#) and [mandatory guardrails for AI in high-risk settings](#).

To mark Human Rights Day in December 2024, our Belong Network – a community dedicated to fostering cultural diversity and inclusion – and Corporate Citizenship team hosted a representative from the Salvation Army Safe House for survivors of human trafficking and modern slavery. Attendees at the event learned about the importance of centring the expertise of modern slavery survivors in any response to the issue, and how they can support the vital work of the Safe House.

Continuous improvement:
forward commitments

Human rights due diligence is an ongoing process and we are committed to continuing to embed modern slavery due diligence within our existing firm-wide risk and procurement processes, with support from our Human Rights and Modern Slavery Working Group (HRWG). KPMG Australia is committed to continuous improvement of our modern slavery response, with our priorities for FY26 and FY27 set out here.



FY26-FY27 commitment

Human rights commitment

Identify opportunities for impactful engagement with relevant stakeholder groups including not-for-profit organisations focusing on salient human rights issues in our region.

Conduct a periodic review of KPMG Australia’s Modern Slavery Risk Appetite Statement and implement recommendations from the review.

Provide capability building to support implementation of our Modern Slavery Risk Appetite Statement during client and engagement onboarding.

Management systems and controls

Conduct annual modern slavery risk profile reviews of selected offshore vendors to determine ongoing alignment with KPMG Australia’s modern slavery expectations and opportunities for continuous improvement.

Supplement the Supplier Risk Management Framework with additional modern slavery assessment of selected higher-risk vendors in technology and hospitality categories.

Support KPMG Fiji and KPMG PNG to continue to uplift modern slavery due diligence maturity.

Grievance mechanisms and remediation

Conduct a periodic review of KPMG Australia’s Whistleblower Policy and implement recommendations from the review.

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