



DT Global

DT Global Australia Holdings Pty Ltd *Modern Slavery Act* Statement

28 March 2025



1 Introduction and Reporting Entities

1.1 Entity structure

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

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

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

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

This statement captures the actions that DT Global APAC has taken to assess and address modern slavery risks in our operations and supply chains since our last report (submitted March 2024), and our plans for strengthening and improvements to those frameworks—via a Modern Slavery Road Map—in the next reporting phase.

1.2 About DT Global APAC

Our services and clients

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

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

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

DT Global has corporate offices in Africa, Australia, Europe, United Kingdom, Kenya and the United States, and our global portfolio spans more than 90 countries.

We also have many regional satellite offices around the world including Indonesia (Jakarta), Papua New Guinea (Port Moresby), Philippines (Manila), Poland, Turkey, Nepal (Kathmandu), Fiji (Suva), Australia (Canberra, Brisbane, Adelaide, Melbourne), Bangladesh, Belgium (Brussels), New Zealand (Auckland), and South Africa (Johannesburg).

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

Our operations and supply chains in APAC

Operations: The majority of DT Global APAC's operations encompass the delivery of professional services in the Asia Pacific region, in the countries listed above. We have a regional team of just under 2,000 personnel and technical experts working in more than 35 countries to solve complex problems, having done so for more than 60 years. These personnel and experts are employed directly by DT Global APAC.

Supply chain: DT Global APAC's broader supply chain includes good and services that are provided directly by our Tier 1 suppliers in the countries that we are working in (for example, provision of consultancy services, construction contractors, office cleaners, security guards, transportation and hospitality); as well as products and services used by both our direct (Tier 1) and indirect suppliers in our supply chain (for

example, low-skilled labour, building materials, and large-scale procurements on infrastructure development programs).

2 Modern Slavery Risks in our Operations and Supply Chains

DT Global APAC recognises that in the geographies that we operate in, human trafficking and modern slavery remain a significant challenge. We also know, based on a recent consultancy (detailed below) that some products procured by our suppliers for use on our programs have a heightened modern slavery risk.

We continue to review and consolidate our frameworks and approaches to assessing and addressing modern slavery risks in our operations and supply chains and have developed a 'Modern Slavery Roadmap' outlining key actions to be undertaken in the next reporting period, including activities that will support a more comprehensive identification and understanding of our highest risk suppliers, geographies and programs.

In this section of our statement, we outline key activities specific to understanding and assessing modern slavery risks in our operations and supply chains covering previous, and this, reporting period.

2.1 Foundational Modern Slavery Assessment and Issues Review (2020)

A foundational, independent analysis was undertaken in 2020, prior to the acquisition of Cardno Emerging Markets (Australia) Pty Ltd by DT Global APAC, to identify and better understand modern slavery risks associated with its business, with a focus on Cardno Emerging Markets (Australia) Pty Ltd (now DT Global Asia Pacific Pty Ltd).

The review aimed to determine the maturity of the business' approach to managing modern slavery risks across its operations and supply chain; identified strengths and gaps; and provided recommendations for more consistent modern slavery prevention processes.

The review provided feedback, specifically on key areas that represented higher modern slavery risk, which are summarised briefly below. The feedback remains relevant today and will continue to inform our assessment of modern slavery risk.

Key area		Narrative
Tier two suppliers and beyond	MEDIUM RISK	<p>Modern slavery risk increases when engaging multiple organisations who rely on tier two and tier three suppliers to provide labour, materials, and equipment. For DT Global APAC, this primarily applies to our infrastructure-related programs but can also include any large-scale procurement or grant funds disbursement.</p> <p>The review found that DT Global APAC has limited visibility of sub-contractors' suppliers (Tier 2 and beyond) and, therefore, there is a risk of being directly linked to modern slavery practices when undertaking infrastructure-related activities.</p>
Third party services	HIGHER RISK	<p>To conduct our business activities, DT Global APAC engages services that rely on a high proportion of labour intensive, low-skilled workers including hotels, hospitality, security, cleaning, and transportation in higher risk geographies.</p> <p>Workers in these services often migrate for work and may be engaged via labour hire or third-party arrangements.</p>
Sector level activities	HIGHER RISK	<p>The review found that DT Global APAC provides resources under client contracts to support sector-level activities that are considered high risk. This may include tourism; agriculture and fisheries; construction; and market systems that work in higher risk geographies. It may also include work directly with farmers, wholesalers, or local business support in high-risk geographies.</p>

The findings of this review have formed the foundational understanding and work of DT Global APAC to date in better understanding and managing its supply chain modern slavery risks.

2.2 Modern Slavery Risk Review – Solar Electrification in Papua New Guinea (2024)

During the reporting period, DT Global APAC also engaged an expert consultancy to better understand modern slavery risks associated with solar electrification work (on-and off-grid) on one of our Australian Government-funded programs in Papua New Guinea (PNG), the Economic and Social Infrastructure Program (ESIP). This program was identified as higher risk due to the procurement of solar and electrical products.

This consultancy provided many useful insights that will inform DT Global APAC's approach to programs working in similar high-risk sectors and procuring higher-risk products.

The consultancy involved an initial context review which revealed a moderate prevalence of modern slavery within PNG, however, noted that the program's main connection to modern slavery was likely through its global supply chains and importation of solar and electrical products potentially being produced by forced labour in high-risk countries such as China.

External experts undertook a supply chain modern slavery risk assessment for electrification products procured by the program; a process review; development of a human rights risk analysis tool; training; and an implementation roadmap.

Key recommendations received for the ESIP program as part of the supply chain risk assessment included:

- Diversification of solar panel sourcing as more options, including from Australia, become available. In the near term, the experts recommended careful selection of panels from China, including panels that are ethically produced which are available.
- Prioritisation of the purchase of lower-risk batteries, including those produced outside China. If purchasing from China, prioritisation of non-cobalt or non-lithium alternatives like sodium-ion batteries was recommended, in addition to supplier screening for all battery purchases.
- Additional due diligence specific to insulated wire imports.

The human rights risk analysis tool also allows ESIP to pre-assess potential electrification suppliers on their human rights risk and determine whether an in-depth due diligence process is required. The tool sets out standardised questions relating to key human rights and modern slavery risk indicators and presents different escalation steps based on the derived risk level.

Key observations specific to DT Global APAC's governance framework and approach to modern slavery risk assessment were also provided, and these form the basis of our 'Modern Slavery Roadmap' outlined below.

2.3 Development of Modern Slavery Roadmap

Building off the specific and targeted work undertaken on the ESIP program, DT Global APAC has developed a Modern Slavery Roadmap that includes specific tasks to better understand DT Global APAC's supply chain risks at the portfolio level. The work will be driven by our Modern Slavery Working Group and is detailed further in the section below on 'Looking Forward'.

3 Actions Taken to Assess and Address Modern Slavery Risks

At DT Global APAC, modern slavery falls within the broader focus area of safeguarding. For DT Global APAC, 'safeguarding' means protecting the health, well-being, human rights and natural environment of people and communities that we engage with through our programs and corporate operations, with a particular focus on safeguarding women, children, and vulnerable adults. Women, children, and vulnerable people are also those who are disproportionately impacted by modern slavery and human trafficking.

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

3.1 Governance – Modern Slavery Working Group

During the reporting period, DT Global APAC established a multi-disciplinary Modern Slavery Working Group – reporting to the APAC Managing Director – to drive key deliverables in the Modern Slavery Road Map. The Working Group includes representatives from the following functions across our business:

- Legal Counsel
- People & Culture
- Operations
- Procurement
- Safeguarding & Integrity
- Infrastructure Unit
- Relevant program-level representatives.

Key objectives of the Working Group are to:

- Review and strengthen DT Global APAC's approach to modern slavery to ensure compliance with relevant legislation; established and emerging donor requirements; and broadly strengthen practice in this space.
- Engage internally and across the business to raise awareness of, and respond to, modern slavery risks and opportunities.
- Respond in a timely manner to requests for support, information and approvals from program teams and corporate offices specific to modern slavery.

This working group will drive delivery of the Modern Slavery Road map, as outlined below.

3.2 Policy framework

DT Global APAC's policy framework reflects our commitment to the elimination of all forms of slavery within our operations and supply chains.

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

As we deliver our roadmap over the next reporting period, DT Global APAC will reflect key changes and approaches in relevant policy documents, including our Anti-Slavery and Trafficking Procedure, and suite of tools to assess modern slavery risks.

3.3 Procurement due diligence

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

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

- **Procurement / grant approaches and supplier / grantee identification:** DT Global APAC's Procurement Toolkit, Grants Manual, and Subcontractor and Grantee Compliance and Performance Management Procedure reference modern slavery risks throughout and provide clear guidance to DT Global APAC personnel on engagement and management of suppliers and grantees. All tender and grant making documentation reference DT Global APAC's safeguarding requirements, as does our Due Diligence Preliminary Supplier Statement.
- **Due Diligence:** Prior to contracting suppliers and grantees, a formal Due Diligence Assessment is undertaken, which includes questions specific to the suppliers' processes to address and manage modern slavery risks within their supply chains.
- **Risk assessment:** DT Global APAC programs are required to undertake risk assessments at inception and throughout implementation. Risk assessments are conducted across a range of safeguarding areas, with assessments also assessing project interactions with vulnerable people who may be at high risk of modern slavery. Suppliers are also required to conduct safeguarding, fraud, and corruption risk assessments upon entering into contracts with DT Global APAC.
- **Contract clauses:** All DT Global APAC contract templates include safeguarding clauses—including explicit reference to modern slavery—in addition to inherent requirements regarding supplier / grantee induction; disclosures and reporting; due diligence; interlinkages with fraud and bribery; and warranties.
- **Supplier Induction:** Supplier inductions are undertaken prior to commencing work with DT Global APAC, utilising a standard 'Compliance Pack' to ensure consistency of information shared. The Compliance Pack covers content on DT Global APAC's mandatory compliance and contract requirements, including safeguards, slavery, and risk management.
- **Auditing:** Our internal audit program adopts a sample-based assurance methodology to monitor that due diligence practices are followed. Audits are conducted and reported at least annually as part of management review and under third party ISO9001:2015 certification. Internal audit checklists include specific questions on supplier / grantee compliance and management and safeguarding issues.

3.4 Training

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

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

We will be strengthening this training content in the coming reporting period.

3.5 Modern slavery awareness

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

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

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

4 Measuring Effectiveness

DT Global APAC is developing systems and tools to measure the effectiveness of actions taken to combat modern slavery, which will include following key metric for the upcoming reporting period.

- Percentage of DT Global APAC personnel that have completed their modern slavery training on the DT Global Learning Management System.

As DT Global APAC rolls out our Modern Slavery Roadmap, we plan to add other indicators to this list and will report on updated metrics in our next statement.

5 Reflection and Looking Forward

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

5.1 Modern Slavery Roadmap

Driven by our underlying commitment to safeguarding vulnerable people; with additional information in hand from the PNG ESIP modern slavery consultancy; and noting that requirements—including from our clients and partners—are becoming more stringent, we have developed a Modern Slavery Roadmap that aims to further refine our approach to managing modern slavery risks across our operations and supply chains.

The Road Map includes the following key components:

Component and timeframe	Detail
Modern Slavery Working Group Active, ongoing	As this Group is in its early stages, the Road Map includes supporting the Working Group in their understanding (and leadership) specific to issues of modern slavery; understanding current gaps in our approaches; and driving the roll out of the Road Map.
Modern Slavery Training updates Q2–Q3 2025	It has been identified that, with the shift in online Learning Management Platforms, there are updates required to DT Global APAC's mandatory modern slavery training package. These updates include further customisation of scenario examples to be region-specific, updates on Australian legislation, and information about reporting options and referral pathways. These updates will be rolled out in the coming reporting period.
Anti-Slavery and Trafficking Procedure Q3–Q4 2025	Our Anti-Slavery and Trafficking Procedure will be updated to reflect updates to the DT Global APAC governance framework (specifically, the Modern Slavery Working Group); more robust approaches to risk assessment and management; and other components of this Road Map.

Component and timeframe	Detail
Program-level modern slavery risk screening Q3 2025	<p>DT Global APAC is currently in the process of updating our program-level risk assessment documentation – our ‘Safeguards Risk Assessment’. This risk assessment will incorporate additional, customized modern slavery risk screening questions in addition to those focused on other safeguarding risk factors.</p> <p>Where programs are identified as higher risk for modern slavery (due to geographic, sector or product risks), DT Global APAC will require a more detailed, program-level analysis (similar to what was undertaken on the ESIP program) to determine fit-for-purpose, program-level risk mitigation efforts.</p>
Portfolio-level modern slavery supply chain risk assessment Q3–Q4 2025	<p>During this reporting period, DT Global APAC is committed to gaining a more comprehensive understanding of the risks in our global supply chain. We are currently engaging with an expert firm to screen all Tier 1 suppliers (approximately 1,000 suppliers) to ascertain the highest-risk geographies, supplier types, and which of your programs hold the most risk.</p> <p>Through this screening, we will identify our highest-risk suppliers which will enable targeted monitoring and risk management approaches.</p>

6 Consultation and Statement Approval

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

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

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



Joanne Choe
Managing Director, DT Global Australia Holdings Pty Ltd
28 March 2025