

EY Australia Modern Slavery Statement

FY23



Building a better
working world

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This statement is made on behalf of reporting entities Ernst & Young, Ernst & Young Services Trust, and EY Business Solutions Pty Ltd (together “EY Australia”, “we”, “us” or “our”). Ernst & Young in Australia is a partnership and a member firm of Ernst & Young Global (EYG) Limited, a UK company limited by guarantee. This is EY Australia’s fourth statement, and it has been prepared in accordance with the requirements of the *Modern Slavery Act 2018* (the Act) for the reporting period from 1 July 2022 to 30 June 2023 (FY23). EY owns and controls subsidiary entities and the activities of these entities are included in this statement.

Consultation activities to prepare the statement

EY Australia has a centralised management structure to govern its Australian operations, including Ernst & Young, Ernst & Young Services Trust, EY Business Solutions Pty Ltd (and the entities they own or control) with shared policies, procedures, and business functions to oversee business activities, including modern slavery risk management. The centralised management structure enables EY Australia to operate and govern our modern slavery program as a single, integrated group. This includes, among other things, due diligence activities, implemented controls, modern slavery risk assessments, and the preparation of our annual modern slavery statement.

Our Modern Slavery Program Team, which is made up of subject matter professionals from EY Climate Change and Sustainability Services, supported the preparation of this statement in consultation with our Human Rights and Modern Slavery Working Group (established during the reporting period), which includes key stakeholders from Risk Management, Operations, Finance, Legal, Procurement, Talent, and Corporate Responsibility, whose roles and responsibilities sit across the reporting entities, including the entities owned and controlled by the reporting entities. Consultation activities facilitated communication across EY Australia regarding the reporting requirements, including actions taken and planned actions to address the requirements. Each reporting entity, including entities owned and controlled by the reporting entities, was engaged on an ongoing basis as part of this approach, facilitating the preparation of this joint statement.

This statement is a joint statement made on behalf of the following reporting entities - Ernst & Young (ABN: 75 288 172 749), Ernst & Young Services Trust (ABN: 67 457 905 811) and EY Business Solutions Pty Ltd (ABN: 35 122 885 465).

This statement has been approved by the principal governing body of Ernst & Young, Ernst & Young Services Trust and EY Business Solutions Pty Ltd on 15 December, 2023.

01 Message from our Chief Sustainability Officer and Chief Executive Officer

Thank you for taking the time to read our 2023 Modern Slavery Statement. This statement tells the story of our progress against a strong schedule of actions, including a welcome return to in-country assessments now that COVID-19 restrictions have eased.

This statement also continues the story of the Independent Review into Workplace Culture at EY Oceania published within the year that, although not surfacing modern slavery specifically, highlighted areas where we have failed to effectively protect the rights and wellbeing of all our teams. We have publicly confirmed our commitment to resolving those issues and invite you to access the report at ey.com. In the context of modern slavery, the process serves to highlight that no organisation can afford to be complacent about the effective implementation of its core principles and beliefs. The mission to uphold human rights must be a constant one, particularly as new technologies continue to change the workplace and test the efficacy of traditional guardrails. We must and will work harder to create a trusting and transparent environment where people thrive and problems are solved.

As ever, we invite your feedback and collaboration.



A handwritten signature in black ink, appearing to read 'M. Nelson'.

Mathew Nelson
EY Regional Chief Sustainability
Officer, Oceania



A handwritten signature in black ink, appearing to read 'D. Larocca'.

David Larocca
EY Regional Managing Partner and
Chief Executive Officer, Oceania

02

Key areas of
action in FY23

02 Key areas of action in FY23

Our due diligence activities during the year are summarised in the table on the next page, detailing our progress to identify risk, understand controls, and identify actual impacts for each of our priority risk areas. For the majority of our priority risk areas, our activities enabled us to gain a deeper understanding of the risk profile and the management practices in place to mitigate those risks. For those areas, in FY24, we will take steps to shift our understanding from risk to impact, by conducting further due diligence activities which seek to identify actual impacts and validate the control environment, through supplier engagement and site visits.

For priority risk areas where we progressed to identifying actual impacts in FY23 (for our offshore member firm and outsourced service provider), we will look to move into the 'Enhance' stage in FY24, taking action to drive improvements in identified gaps and to mitigate risks and address impacts.

Evaluate

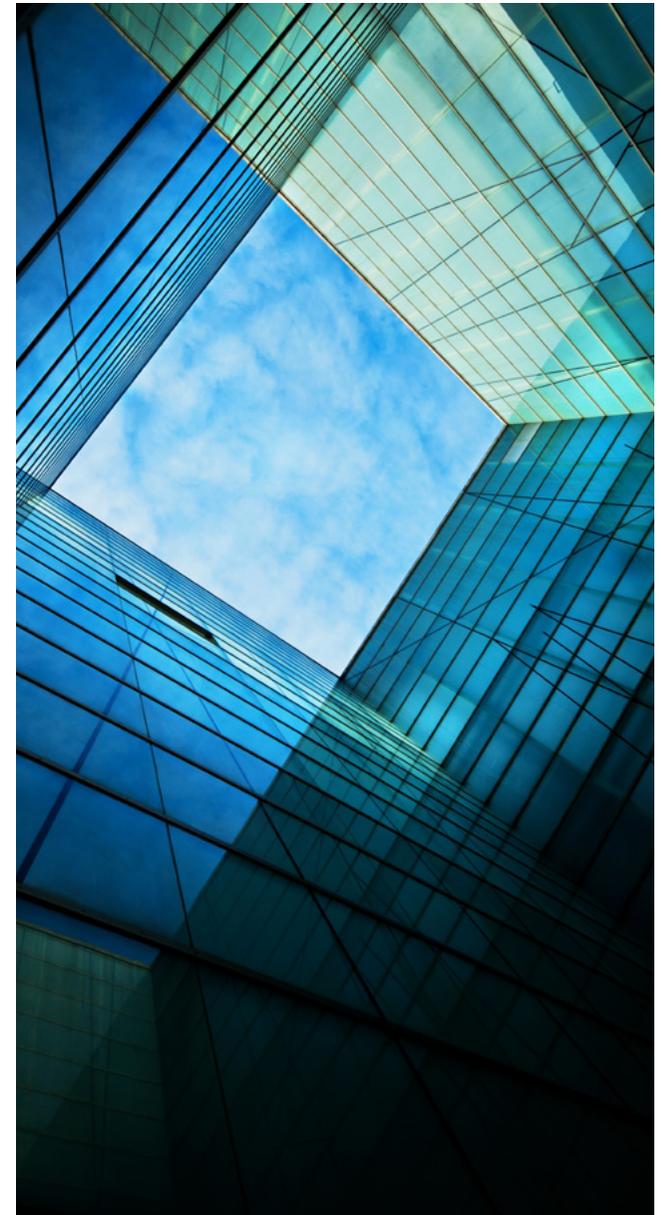
Activities to improve visibility and awareness of modern slavery risks and controls to better understand how modern slavery and labour rights issues are managed, and to identify practices and conditions to be improved.

Enhance

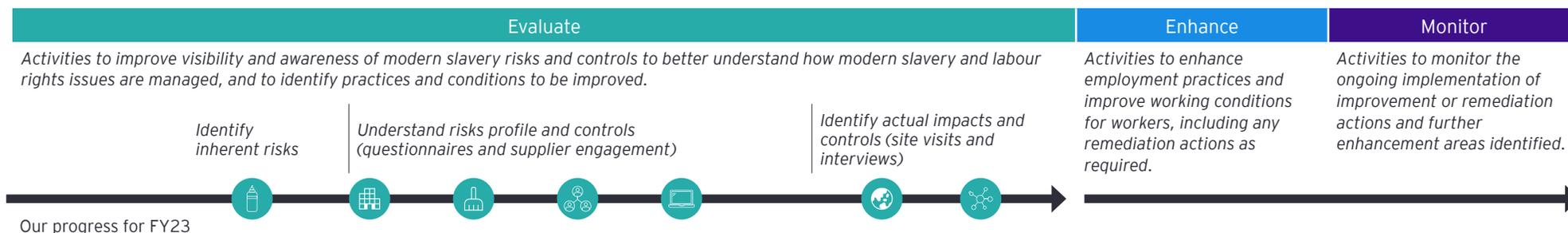
Activities to enhance employment practices and improve working conditions for workers, including any remediation actions as required.

Monitor

Activities to monitor the ongoing implementation of improvement or remediation actions and further enhancement areas identified.



At a glance - our FY23 actions



		What we did (FY23)	What we will do next (FY24)	What we will do later (FY25+)	
	Merchandise provider	Completed a desktop assessment of our main merchandise supplier to better understand the manufacturing locations of promotional items	Commence additional due diligence activities, including supplier engagement and site visits to identify actual impacts and controls	We will work to improve working conditions and employment practices when issues are identified through the evaluate stage of our due diligence activities. This may include remediation actions if modern slavery or broader labour rights issues are identified. We will disclose information on this in future statements	We will continue to monitor progress to facilitate improvement or remediation activities as required. This will involve ongoing collaboration to support the identification of issues or improvement areas
	Real estate	Engaged with a key project manager for upcoming major capital works	Conduct pilot due diligence activities over selected capital expenditure project		
	Cleaning service providers	Sent self-assessment questionnaires to eight cleaning providers to better assess modern slavery risks and controls	Conduct pilot due diligence activities over selected cleaning provider		
	Technology hardware provider	Conducted initial engagement with a technology hardware supplier to better understand modern slavery risks	Commence additional due diligence activities, including supplier engagement and site visits		
	Offshore member firm	Conducted in-country due diligence, involving focus group sessions, management discussions, document review and observation of working conditions	Finalise observations and recommendations and assist with implementing any improvement activities as appropriate		
	Outsourced service providers	Conducted in-country due diligence in the Philippines, involving worker interviews, management discussions, review of documentation and working conditions observations	Finalise observations and recommendations, and assist with implementing any improvement activities as appropriate		
		Held a virtual management meeting to better understand the modern slavery risks and potential impacts	Continue engagement to inform appropriate level of additional due diligence to be conducted		

03

Our commitments

03 Our commitments

We have overarching modern slavery commitments which guide our strategy, provide direction for ongoing activities, and act as a point of reference to review and direct our approach to modern slavery and broader human rights management.

Our Modern Slavery Commitments

- 1. We know modern slavery exists within our supply chain;** experience tells us that there will be modern slavery within our extensive value chains. We will actively work with our suppliers to find exploitative practices and will take immediate action to put an end to them, providing or facilitating effective remediation of harm. We will undertake further work to understand the drivers, including our causal relationship, to inform our approach to prevent future harm.
- 2. We have a duty to use our position and influence to raise awareness, identify and address modern slavery within our operations and supply chains.** We will use our global business relationships to drive on-the-ground improvement in the labour rights of our direct and indirect workforce.
- 3. Our strategic business relationships provide an opportunity to drive immediate and urgent action.** We will participate in multi-stakeholder dialogues to further advance the business and human rights agenda, both locally and globally, with a focus on investigating and mitigating root cause issues.
- 4. Risk-based due diligence is our best hope for finding and addressing slavery.** We will undertake due diligence through on-the-ground engagement with potentially impacted workers throughout our value chain.
- 5. We will work with our stakeholders to identify modern slavery risks and impacts and to facilitate and provide appropriate remedies to impacted people.** We will work to establish trust in the remedial mechanisms available to workers within our operations and supply chain to improve the identification of indicators and instances of modern slavery within our value chain.
- 6. We must continually improve our approach.** We will continue to review and enhance the effectiveness of our response to modern slavery and report on our progress transparently each year, at a minimum. This will involve meaningful engagement and consultation with leading academics, rightsholders in our value chain and those with lived experience as we seek to strengthen the effectiveness of our response.



04

Our progress

04 Our progress

In FY23 we made progress on the commitments we set out in our FY22 modern slavery statement. We have focused our efforts on uplifting our modern slavery program to better investigate and mitigate the risks of modern slavery in our operations and supply chain. Our FY23 progress on those commitments is summarised in the following table.

Progress on our commitments

Pillar	Objective	FY23 commitments	Status	Progress update
Governance	Improve our structure and practices to managing modern slavery risks and impacts.	We will establish a cross-functional human rights and modern slavery working group that will meet periodically to drive and monitor the day-to-day management of modern slavery risks throughout the business.	✔	During the reporting period we established our Human Rights and Modern Slavery Working Group, for which we now have a regular cadence of meetings. See additional details in 'Modern slavery governance' section on page 16.
Due diligence activities for operations	Maintain an active view of our modern slavery risks, impacts and controls over our onshore operations, offshore operations, and outsourced workforce.	We will complete due diligence activities over offshore EY member firms by completing a risk assessment, engaging with relevant stakeholders, and conducting in-country assessments to observe the working environment and conduct unmonitored interviews with personnel. We will make recommendations and assist with implementing uplift activities as appropriate.	✔	We completed an in-country assessment over a selected offshore EY member firm where we observed the working environment, and held discussions with management and unmonitored discussions with employees. See additional details in 'Our approach to managing modern slavery risks for our indirect workforce' section on page 26.

✔ Achieved commitment

▶ In progress

⚠ Not yet commenced

Progress on our commitments

Pillar	Objective	FY23 commitments	Status	Progress update
Due diligence activities for operations	Maintain an active view of our modern slavery risks, impacts and controls over our onshore operations, offshore operations, and outsourced workforce.	We will complete due diligence activities over selected outsourced service providers, including stakeholder engagement and in-country physical site visits. We will evaluate the existing practices to manage modern slavery risks and establish corrective action plans as required.	✔	We completed an in-country site visit over a selected outsourced service provider in the Philippines where we held discussions with management, unmonitored discussions with workers and observed the working environment. See additional details in 'Our approach to managing modern slavery risks for our indirect workforce' section on page 26.
Supply chain due diligence activities	Enhance our supplier due diligence processes to effectively identify and address modern slavery within our supply chain.	We will review our supplier due diligence approach to identify, design, and implement improvement opportunities.	✔	<p>We reviewed our supplier onboarding and management approach during the reporting period and identified improvement opportunities, primarily relating to data quality, which will be implemented with the roll out of our new supplier onboarding platform in FY24.</p> <p>We also established a due diligence approach to engage with our suppliers and assist us in identifying modern slavery risks and impacts.</p>

 Achieved commitment
  In progress
  Not yet commenced

Progress on our commitments

Pillar	Objective	FY23 commitments	Status	Progress update
Supply chain due diligence activities	Enhance our supplier due diligence processes to effectively identify and address modern slavery within our supply chain.	Engaging with our largest technological hardware supplier to better understand root causes driving the systemic labour exploitation across the industry and collaborate to explore opportunities which seek to prevent and address modern slavery practices within the industry.		<p>We engaged with our largest technology hardware supplier to better understand the modern slavery risks within the industry and the approach taken by management in managing modern slavery.</p> <p>Further to this initial engagement, we will commence additional due diligence activities in FY24.</p>
		Completing pilot due diligence activities and incorporating modern slavery due diligence into future capital expenditure projects.		<p>During the reporting period we engaged with our in-house procurement and capital projects teams to workshop our approach to undertaking pilot due diligence activities for capital expenditure projects.</p> <p>Based on our discussions, we identified two projects for due diligence activities and engaged with one of our key project managers. Due to the timeframes for the projects, pilot due diligence activities will begin in FY24.</p>
		Conducting preliminary due diligence activities over our primary merchandise and stationery supplier to inform future due diligence activities.		<p>We completed a desktop assessment over our primary merchandise and stationery supplier during the reporting period. We will be commencing additional due diligence activities in FY24 for selected merchandise and stationery suppliers.</p>

 Achieved commitment  In progress  Not yet commenced

Progress on our commitments

Pillar	Objective	FY23 commitments	Status	Progress update
Grievance and remediation	Review and improve our grievance and remediation processes to better identify and respond to identified indicators or instances of modern slavery.	We will improve how we capture and characterise grievances raised through our grievance mechanisms to better identify and analyse where there may be broader human rights issues.	☑	We improved the characterisation of grievances received through the EY Ethics Hotline to better identify broader human rights issues. These changes will be implemented in FY24.
		We will review and enhance our escalation and remediation processes to appropriately prepare to respond to any identified indicators or instances of modern slavery.	☑	We established our Human Rights and Modern Slavery Working Group to improve oversight over modern slavery and broader labour rights issues. We held working group meetings and our Modern Slavery Program Team collaborated and consulted regularly with Risk Management, Legal, Procurement, and Corporate Responsibility teams to increase awareness of how modern slavery and human rights issues should be escalated throughout the business. We also established a due diligence approach to engage with our suppliers to assist us in identifying modern slavery risks and impacts.
Assessing effectiveness	Better understand whether our controls are having an impact in identifying and reducing modern slavery.	<p>We will establish a framework to assess the effectiveness of our actions to drive continued improvements each year. This will include a mechanism to assess the design and implementation of our modern slavery approach.</p> <p>We will also look to engage external non-governmental organisations to review our approach.</p>	▶	In FY23, we started the development of our outcomes measurement approach to measure not only the output of our actions, but the outcomes we seek to achieve. These will be informed by the learnings and outcomes from our consultation with rightsholders through our targeted due diligence activities with offshore operations and outsourced service providers in FY23 and planned supplier engagement in FY24.

☑ Achieved commitment ▶ In progress ⚠ Not yet commenced

05

Our position,
approach and
governance

05 Our position, approach and governance

Our position

The global EY organisation is committed to respecting and promoting the human rights of all EY people, including those we interact with through our business relationships and activities. We believe upholding human rights is fundamental to our purpose of building a better working world. EY acknowledges its responsibility to

respect human rights and to take appropriate action to prevent and remediate occurrences of modern slavery which we may cause, contribute to, or be linked to through our business activities. Modern slavery is an abhorrent crime, and we know we have a duty to use our position to raise awareness to respond to slavery.

The diagram below shows our type of potential involvement and how we may cause, contribute to, or be directly linked to human rights risks and impacts. It is critical that we understand our potential involvement to inform how we address and remediate the impact.

Potential involvement	Definition of involvement	Appropriate action
Cause	Causes harm through own acts or omissions	Cease or prevent impact, and provide/cooperate in remediation
Contribute	Contributes to harm through own acts or omissions	Cease or prevent contribution, use leverage to address remaining impact and provide/cooperate in remediation
Directly linked	Directly linked to harm through operations, products or services by a business relationship	Use leverage to seek to prevent and mitigate impact

Value chain	Type of potential involvement			Rightsholders
	Cause	Contribute	Directly linked to	
EY people: How we manage our people	√ Impacts to our people			Direct and indirect workforce
EY services: The services we provide to clients		√ Through our clients		Clients, clients' workforce and supply chains
EY clients: Who we work with and how we engage				
EY supply chain: As a procurer of goods and services		√ Through our suppliers		Suppliers, suppliers' workforce and subcontractors
EY affiliates, EY community engagement, regulators and civil society		√ Through our wider business relationships and networks		Wider communities

← Degree of involvement →

Modern slavery governance

Our position and response to modern slavery and broader human rights issues is supported by our global and local policies, which are reviewed and updated periodically. Our key policy documents include our Global Code of Conduct, Global Human Rights Statement and Global Supplier Code of Conduct, set out below.

Global Code of Conduct

The EY Global Code of Conduct is a clear set of standards for our business conduct. It provides the ethical and behavioural framework on which we base our decisions every day. All EY people are required to confirm that they will comply with the Code.

Global Human Rights Statement

The EY Global Human Rights Statement was endorsed by our Global Executive and establishes our commitment and approach to upholding and promoting fundamental human rights.

Global Supplier Code of Conduct

The EY Global Supplier Code of Conduct establishes a shared understanding with suppliers of our minimum expectations and standards regarding modern slavery and broader human rights issues.

We are evolving our approach to managing modern slavery risks to enhance the effectiveness of actions taken. In FY23, EY Australia established a cross-functional Human Rights and Modern Slavery Working Group to drive and monitor the management of modern slavery risks throughout the business. Key business functions within the working group include Procurement, Operations, Talent, Legal and Workplace Services. The working group met three times during the reporting period to discuss the progress of our agreed actions, and any challenges and opportunities identified throughout the business. This included a modern slavery activation

week with key business functions to launch the working group and to discuss improvements to our modern slavery program and planned activities for FY23, as well as to drive ongoing collaboration and increase awareness of modern slavery risks and impacts.

EY Australia also established a Modern Slavery Program Team, which includes human rights and modern slavery subject matter professionals from the EY Climate Change and Sustainability Services team and is responsible for implementing day-to-day controls and activities to manage modern slavery risks, with support

from local and global business functions. In particular, the Modern Slavery Program Team is responsible for convening the Human Rights and Modern Slavery Working Group and works closely with other key business functions to provide support and expertise to assist in the management of human rights and modern slavery risks and impacts in relation to our operations and supply chain.

Our Modern Slavery Program is overseen by our Chief Sustainability Officer, who is part of the Oceania Executive Leadership team.

Our modern slavery program governance structure

Oversight	Regional Partner Forum Advisory forum to the Oceania Executive Leadership Team.		
	Executive Leadership Team Oversee and review the management, administration and governance of EY member firms in Oceania. Updates on the modern slavery program are communicated to relevant members of the Oceania Executive Leadership Team during modern slavery working group meetings.		
	Human Rights and Modern Slavery Working Group Oversees human rights and modern slavery matters within EY operations and supply chain. The working group includes members of the Oceania Executive Leadership Team including our Chief Sustainability Officer and Risk Management and Independence Leader.		
Ownership	Chief Sustainability Officer Responsible for the modern slavery program and the Modern Slavery Program Team. Our Chief Sustainability Officer reports to the Chief Executive Officer and is the point of escalation for any modern slavery related issues. The Chief Sustainability Officer also provides updates to the Oceania Executive Leadership Team.		
Management and execution	Modern Slavery Program Team Responsible for implementing controls and completing activities to manage modern slavery risks, including supplier due diligence activities, operational assessments and uplifts, supplier modern slavery risk screening assistance, running the modern slavery working group and drafting the modern slavery statement.	Procurement Responsible for supplier modern slavery risk screening and including modern slavery considerations into supplier agreements and engagements. Supported by the Modern Slavery Program Team and other dedicated operational staff to integrate modern slavery considerations into supplier relationships.	Other business functions Risk Management, Operations, Finance, Legal, Procurement, Talent, and Corporate Responsibility are responsible for integrating relevant elements of modern slavery management.

06

Our operations and supply chain

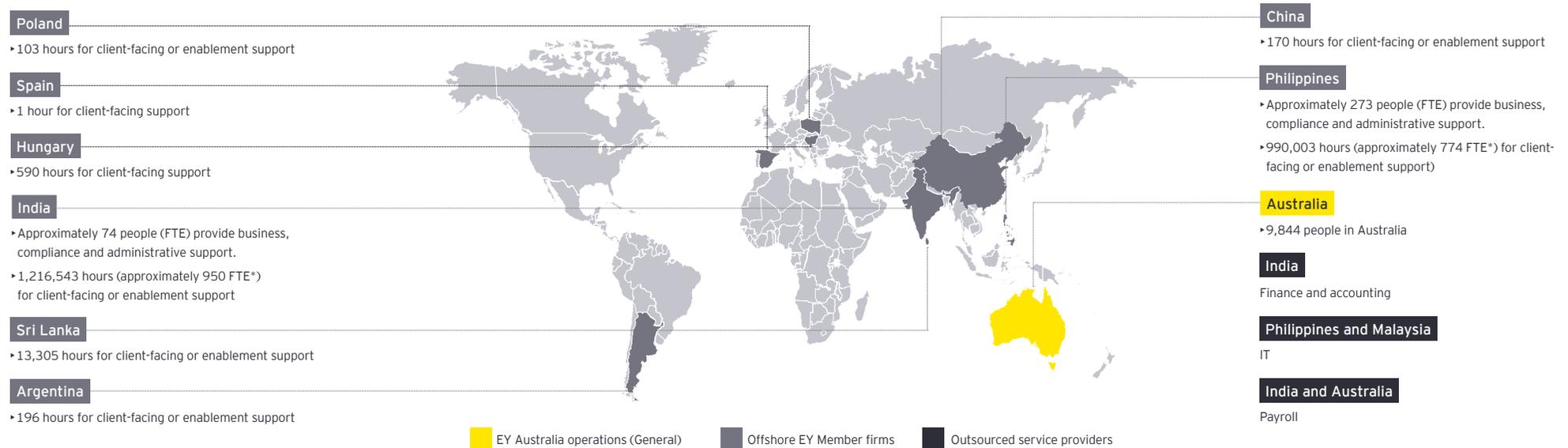
06 Our operations and supply chain

Our operations

EY provides insights and services to create long-term value for our clients, people and for our communities and is committed to building a better working world. With an established network of multidisciplinary teams in over 150 countries with more than 700 office locations, the EY organisation delivers a diversity of knowledge, skills and experience to create positive change. EY is committed to supporting a world free of modern slavery and works with clients to strengthen the management of their human rights risks, to improve the livelihoods of the workforce in their value chains.

As at 30 June 2023, EY Australia employed approximately 9,844 people across our seven Australian offices. Our Australian operations are further supported by offshore EY member firms and outsourced service providers. Approximately 74 people (full-time equivalent) in India and 273 people (full-time equivalent) in the Philippines, working out of EY member firms deliver business, compliance and administrative support to our Australian workforce. Refer to the map below for hours of client-facing support provided by offshore EY member firms.

EY Australia is also supported by EY member firms in the Philippines, India, Argentina, China, Hungary, Poland, Spain and Sri Lanka for client-facing or enablement support. Outsourced service providers based in offshore locations including India, Malaysia and the Philippines, also provide support across finance and accounting services, IT help desk support and payroll services. The map below illustrates the locations of EY Australia operations, our offshore EY member firms and our outsourced service providers.



* FTE (full time equivalent) has been calculated for EY member firms in India and the Philippines based on approximately 25.6 hours per week for 50 weeks a year given that our offshore team members do not work solely on our projects and for comparability purposes with FY22 figures.

Our supply chain

During FY23, EY Australia procured goods and services from around 17,300 suppliers from 72 countries, with goods and services falling into six main procurement categories. FY23 was the first full year following COVID-19 where travel restrictions were not applicable, resulting in an increase in the total number of our suppliers and additional spend in foreign countries, as our supplier data includes transactions made by our partners and employees on corporate credit cards and company accounts which relate to business purposes such as travel, meetings and events.

EY Australia procures a variety of products and services from its suppliers. The types of products and services procured, and location information, are outlined below.

We engage recruitment agencies to help us identify the best talent, as well as source learning and development goods and services to continue to build the capability and nurture the wellbeing of our people.

We continue to connect with our peers and clients through business travel, which includes air travel, hotels, meals, venues and ground transportation.

Our office building leases, and construction products and services for office fit outs and refurbishments.



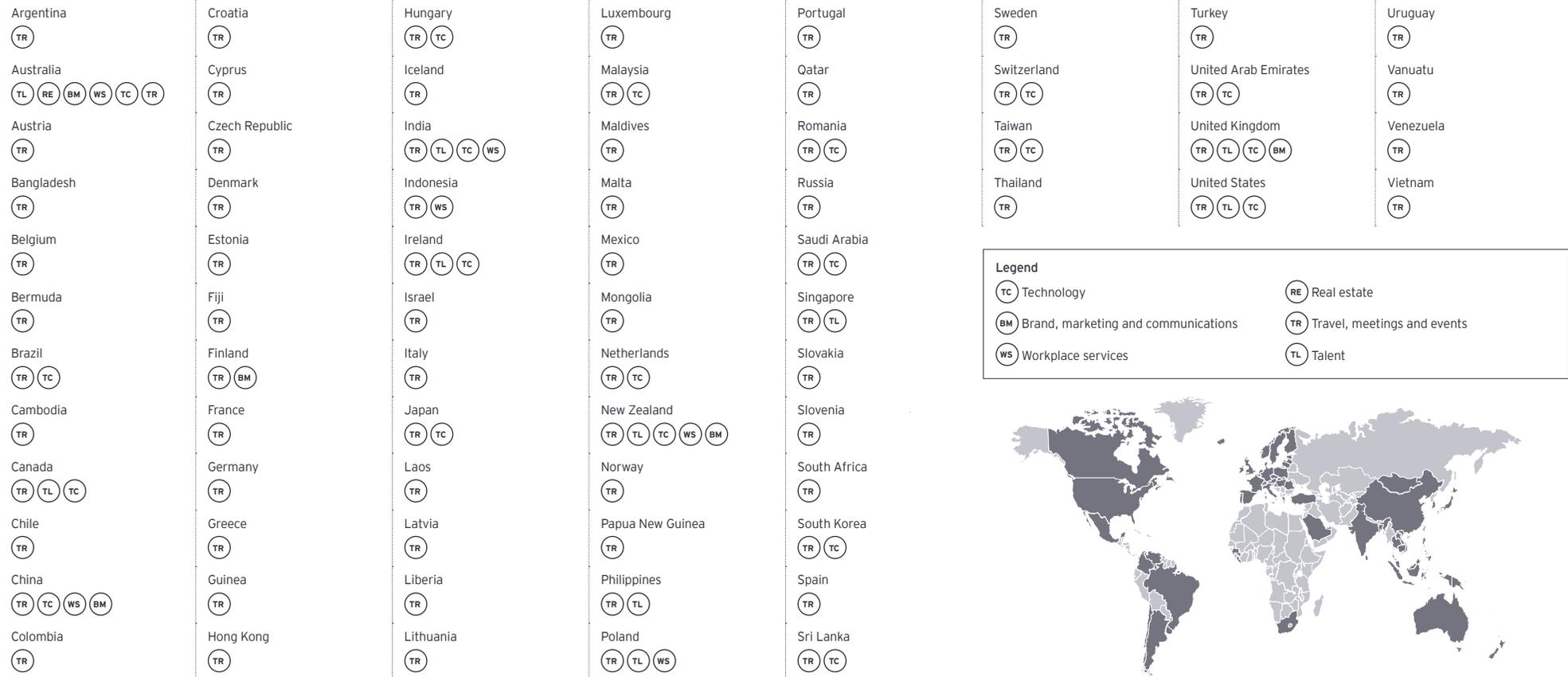
Our technology includes technology hardware (e.g., laptops, monitors and peripherals), software, telecommunication, and IT support services.

The goods and services we use to support our brand, marketing and communication activities, including sponsorships and promotional merchandise such as water bottles, notepads and stationery.

The goods and services we use in our offices such as office equipment and supplies, and onsite services such as cleaning, catering and property maintenance.

Our supplier locations

The chart below details the locations of our direct and indirect suppliers, and which procurement categories were sourced from each country.



07

Our approach to
managing modern
slavery risks

07 Our approach to managing modern slavery risks

Modern slavery risks

EY Australia completed a risk and prioritisation assessment of its operations and tier one suppliers to identify and assess inherent modern slavery risks during the reporting period. The risk assessment was conducted using the EY ESG Risk Tool and considered country and industry risk factors to determine an inherent risk score for modern slavery risk factors, including forced and bonded labour, child labour, human trafficking and servitude.

We reviewed the prioritisation assessment previously completed which considered the level of inherent risk present, the causal link between EY and the labour rights issue (including the level of influence over the business relationship) and whether the product or service is central to EY operations. Our priority areas in relation to modern slavery remain consistent with previous years because of minimal changes to the structure and nature of our business activities and supplier relationships.

Country risks were assessed through an analysis of credible indexes and databases. For example, the statistics on forced labour and child labour published by the International Labour Organisation.

Industry risks were assessed by considering known industry risk factors such as the use of unskilled, temporary or seasonal labour, short-term contracts, outsourced labour, foreign workers, the presence of opaque intermediaries, as well as whether there are known labour rights controversies within the industry.

Modern slavery risks in our operations

EY Australia considers the risk of modern slavery for our direct workforce to be low. This is due to a low inherent risk of forced labour, child labour and other forms of modern slavery in Australia and the professional services industry. The office-based nature of our work and higher level of skill required to deliver our services, combined with a low proportion of vulnerable workers, further contributes to the low-risk rating. The modern slavery risks for our direct workforce in our operations are further mitigated by our policy environment and our zero-tolerance approach to modern slavery practices. While we consider the risk of modern slavery to be low, we have identified broader labour rights risks within our workforce, discussed in further detail in the Culture Review section on pages 24 and 25.

Our approach to managing modern slavery risks for our direct workforce

Our governance structure, zero-tolerance position regarding modern slavery within our operations, and our policies and procedures drive our approach to managing modern slavery risks within our operations. We provide all employees with written employment agreements which clearly communicate working rights as well as terms of employment, including (but not limited to) working hours, remuneration and notice periods for people who choose to depart the firm. Our Talent team confirms appropriate visa status of our employees during onboarding and confirms, manages and monitors working entitlements in line with Australian legislation. We also maintain compliance with Australia's workplace relations laws, health and safety laws and regulations, and have health and safety policies and procedures in place. During the reporting period, we commenced the development of a Psychosocial Risk Management Framework to improve how we manage psychological and social health and safety risks within our workforce. Our grievance and remediation processes also form part of our approach to managing operational modern slavery risks, discussed in more detail on page 34.

Culture Review

Independent Review into Workplace Culture at EY Oceania (Culture Review)

Modern slavery sits along a broader continuum of human rights priorities. This continuum includes decent and respectful work and the right for all EY people to enjoy a safe and healthy working environment, and to be free from discrimination, harassment and other forms of mistreatment.

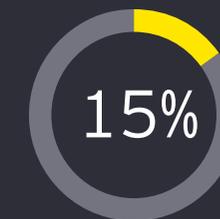
In September 2022, we commissioned Elizabeth Broderick & Co (EB&Co) to lead an independent and comprehensive examination of workplace culture in EY Oceania's two largest member firms, Australia and New Zealand, following the tragic death of a colleague in the EY Sydney office. We also wanted to better understand workplace experiences following COVID-19, a period of unprecedented anxiety and uncertainty for many, and to help inform meaningful actions to build a more inclusive, safe and respectful workplace. The review examined psychological safety, sexism and sexual harassment, racism, bullying and the wellbeing impacts of long working hours, with a specific focus on the wellbeing of our people and how we can better support them. We chose to do this independently and with full transparency to our people and the public.

The culture review report was released in July 2023 and will have significant implications for the way we operate. EY Leadership has committed to implementing all recommendations made in the report.

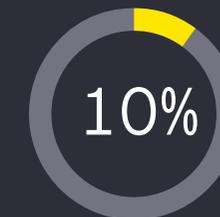
The culture review found a significant majority of our people have a positive experience. They are proud of the organisation's history and most consider it to be an inclusive workplace where they feel safe and empowered to speak up with ideas, questions or concerns. However, despite a range of initiatives implemented to advance and promote a safe, inclusive and respectful culture, bullying, sexual harassment and racism continue to exist in the workplace, causing harm to those who experience these behaviours. There were findings in the report that are distressing and completely unacceptable. We recognise that in several critical areas, we fell short of the standard our people have a right to expect.

The findings of the culture review are inconsistent with the rights of our people to a safe and healthy working environment, free from discrimination, harassment and other forms of mistreatment.

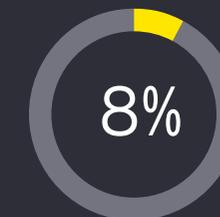
Selected findings of the report included the following:



of people experienced bullying in the last five years with women (17%) more likely to have experienced bullying than men (13%)



of people experienced sexual harassment in the last five years, with women (15%) more likely to experience sexual harassment than men (6%)



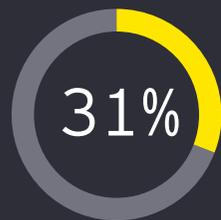
of people experienced racism in the last five years, with people who identified as ethnically Indian (16%), Chinese (15%) or Māori (21%) more likely to have experienced racism. Similarly, people whose religion is Hinduism (18%) or Islam (17%) were more likely to have experienced racism in the last five years

Culture Review

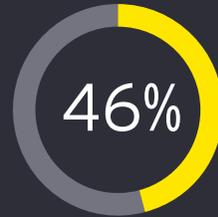
Another finding of the culture review was that long working hours and overwork are a critical issue and are having a negative effect on individual wellbeing, team cohesion and retention. Excessive working hours is recognised by the International Labour Organisation as an indicator of forced labour (a form of modern slavery) and may be considered a violation of basic human rights more generally.

Excessive working hours in isolation does not constitute forced labour, however, may be considered dangerous or substandard work which can be a precursor to more severe forms of exploitation. Other factors, such as whether workers consent to overtime or were pressured or disadvantaged if they asked to work regular hours, will contribute to where the potential labour rights violations fall on the continuum of exploitation.

Key findings in the report in relation to working hours are:



of people are working 51 or more hours in a week routinely, (i.e., at least one week out of every four) and approximately one in ten (11%) are working 61 or more hours in a week routinely (i.e. at least one week out of every four)



A substantial proportion of people report experiencing a range of negative impacts associated with their long working hours and experiences of overwork, with nearly half of people (46%) reporting that their health has already been negatively affected as a result of their long working hours

These findings are significant. At EY we are committed to ensuring the rights of all people to enjoy a physically and psychological safe work environment and the right of all people to be respected and valued for their differences, with equitable opportunities and outcomes, in an inclusive environment where all can thrive.

Culture Review recommendations

More than 4,500 people participated in the culture review via written submissions, group listening sessions, confidential one-on-one interviews or via an online survey. This enabled EB&Co to identify what is working well, areas for improvement and actions that can be taken to continue to promote an inclusive and respectful workplace.

The report includes 27 recommendations to help make meaningful improvements to our workplace culture and positively promote the wellbeing of all our people in Oceania. These recommendations range from the revision of Key Performance Indicators to strengthen leadership and recognise contributions to improving Diversity, Equity and Inclusion, to reducing overwork and excessive hours through more accurate project scoping, resourcing and costing. The report also recommends five experimental pilot initiatives focused on work pressures.

We are establishing an EY Oceania Implementation Taskforce, which will include members from our Diversity Networks, our Leadership Advisory Forum and Partners, and have responsibility for overseeing the implementation of all EB&Co's recommendations and the evaluation and reporting of our progress against them. The report and media release are available on [ey.com](https://www.ey.com). Our response to the findings of this review and the implementation of its recommendations will be addressed publicly in our annual Value Realised Scorecard and our modern slavery statement next year.

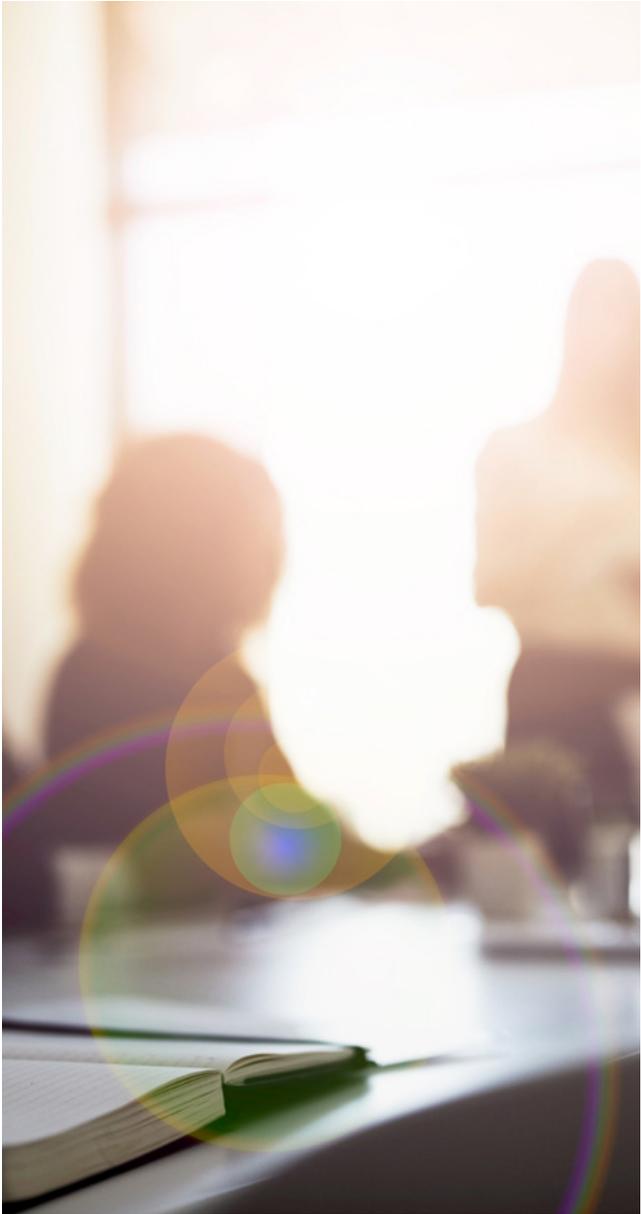
Modern slavery risks for our indirect workforce

Our Australian operations are supported by offshore EY member firms located in India, the Philippines, Argentina, China, Hungary, Poland, Spain and Sri Lanka, and outsourced service providers based in offshore locations including India, Malaysia and the Philippines. We are aware of the known labour rights issues associated with outsourcing business processes to offshore locations caused by poor working conditions, a lack of transparency over workers' rights, underpayment and weaker workplace relations policies common within these countries. EY Australia therefore recognises that there is a higher inherent risk of modern slavery affiliated with the work carried out by our indirect workforce.

Due to the global nature of our business and our work, we may collaborate with other EY member firms on a project specific basis. However, the boundary of our activities does not extend to the broader network of EY member firms.

Our approach to managing modern slavery risks for our indirect workforce

EY policies relevant to labour rights, health and safety and entitlements also govern our indirect workforce in offshore member firms. Our indirect workforce is also subject to working rights in accordance with relevant local laws. During FY23, we also completed an additional review of one of our offshore operations which is discussed below. We recognise the importance of continuing our efforts to engage with our offshore member firms and outsourced service providers to manage modern modern slavery risks on an ongoing basis, and to build on our current view of the risks, impacts and risk mitigation measures, including actively addressing and monitoring any identified improvement areas.



Due diligence activities for our indirect workforce

EY offshore member firm

We completed an in-country assessment over a selected offshore EY member firm during the reporting period. In performing this assessment, we conducted management interviews, focus group interviews with personnel and on-site walkthroughs of the business location to observe the working environment. We also completed a desktop assessment over regional policies and enquired about outstanding queries with management. The assessment considered multiple factors related to modern slavery and broader human rights issues, including:

- Working conditions
- Working hours
- Wages
- Supply chain due diligence practices
- Recruitment practices
- Access to grievance mechanisms

We are currently in the process of finalising our observations and recommendations, and will assist with implementing any improvement activities as appropriate.

Outsourced service provider site visit

We completed an in-country site visit in the Philippines over a selected outsourced service provider. In performing this site visit, we conducted management interviews and unmonitored worker interviews, and completed an on-site walkthrough of the operations to observe working conditions. We also completed a desktop assessment over the businesses' policies and procedures, and enquired about outstanding queries with management. Our assessment was conducted against the EY Global Supplier Code of Conduct focusing on modern slavery practices (such as forced labour and child labour) and broader labour rights factors, including:

- Working conditions
- Working hours
- Wages
- Supply chain due diligence practices
- Recruitment practices
- Access to grievance mechanisms

The modern slavery controls and other business controls were mostly consistent with our Global Supplier Code of Conduct. We did identify some improvement opportunities in relation to access to grievance mechanisms and broader supplier due diligence practices, including the right to audit suppliers and incident response procedures.

We are in the process of finalising our evaluation of existing practices and will work with the outsourced service provider to implement any required corrective actions. In addition to improving the service provider's modern slavery controls, this will facilitate greater visibility over our extended supply chain as we look to begin mapping tier two suppliers.

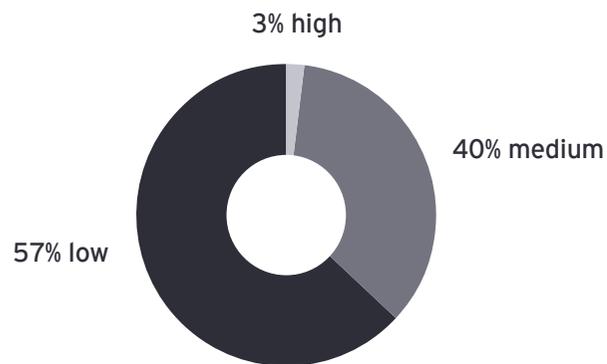
Outsourced service provider engagement

We also held a virtual management meeting with another outsourced service provider to better understand the modern slavery risks and potential impacts. We are now following up with a detailed modern slavery questionnaire and will complete any further due diligence activities appropriate considering identified modern slavery risks.

Modern slavery risks in our supply chain

We completed an inherent risk assessment over our supplier base to understand the modern slavery risks within our supply chain. Based on country and industry risk factors, the majority of our suppliers fall within the low and medium inherent risk categories, with only a small portion of our suppliers having a high inherent risk of modern slavery.

The figure below contains a breakdown of the inherent modern slavery risk level of our direct and indirect supplier base in FY23.



The above inherent risk breakdown includes transactions made by our member firm Partners and employees on corporate credit cards and company accounts which relate to business purposes such as travel, meetings and events.

We are continuing to investigate process improvements to enhance the quality and accuracy of our data, and we will implement identified improvements in FY24 with the launch of a new supplier onboarding platform. This platform has been designed to enhance our global supplier screening and management processes to improve the quality of our supplier data, and to increase our understanding of the modern slavery risk profile of our suppliers.

Modern slavery and other exploitative practices can be difficult to identify, especially deeper within supply chains where the inherent risk of modern slavery may be elevated due to suppliers operating in high-risk geographies, industries' complex business models, the presence of vulnerable populations, or a combination of these factors. We recognise that modern slavery risks are present in our extensive value chain and that the quality of our supplier data means we have limited visibility beyond tier one suppliers. We will work with our Global Procurement team to improve the quality of our supplier data to increase our visibility, including to begin mapping our supply chain beyond tier one suppliers. This will help improve our understanding of the modern slavery risk profile of our supply chain so that we can better manage these risks and impacts.

Our approach to managing modern slavery risks in our supply chain

Our modern slavery approach is managed in part through global policies and procedures, including the EY Global Procurement and Supply Chain Policy and the EY Global Supplier Code of Conduct, which establish minimum expectations for suppliers and guide procurement practices. Our targeted due diligence activities, modern slavery training, and grievance and remediation processes also form part of our approach to managing modern slavery risks within our supply chain, discussed below. Our approach to managing modern slavery risks in our supply chain is an ongoing process and we recognise there is still more we can do to improve our business practices to uphold human rights, and identify and remediate modern slavery within our supply chain.

Priority procurement categories

Based on the risk and prioritisation assessment undertaken our priority procurement categories for modern slavery risks continue to be technology hardware, branded merchandise and stationery, onsite cleaning services and real estate. This assessment also informed our targeted due diligence activities during the reporting period.



Cleaning service providers



Technology hardware provider



Real estate



Merchandise provider

Supplier due diligence activities

EY Australia takes a risk-based approach to managing modern slavery risks within our supply chain. By prioritising our efforts, we are aiming to reduce harm to people where it is most likely and severe. We also consider the causal relationship between our actions and potential impacts, which helps us to determine whether our actions might cause, contribute to, or be directly linked to modern slavery practices within our supply chain.

In FY23, we focused on targeted supplier due diligence activities over identified priority suppliers. Increasing our supplier engagement and completing supplier assessments helps us to better understand the modern slavery risks within our supply chain and what actions need to be taken. Details of our FY23 activities are outlined in the table on the following three pages.

Cleaning services	FY23 activities
<p>Cleaning services present a moderate inherent modern slavery risk due to the nature of the work, known controversies including underpayment and poor treatment of workers, and the prevalence of migrant labour. EY Australia is aware of these risks, which we consider when prioritising suppliers for due diligence activities. We are conscious of the initiatives to improve working conditions and the treatment of contractors within commercial property management, including cleaning-related initiatives, which are often driven by members of the real estate sector and other civil society actors. We also have a responsibility to actively investigate and mitigate risks by assessing the measures undertaken by our cleaning suppliers to minimise the occurrence of modern slavery and broader labour rights issues within their workforce.</p>	<p>During FY23, modern slavery questionnaires were sent to each of our cleaning suppliers within Australia. We commenced a desktop assessment of our cleaning providers, the outcomes of which will inform further due diligence activities in FY24 to better understand the modern slavery risk profiles, management practices and opportunities for improvements for cleaning providers.</p> <p>In FY24 we will further investigate our current relationships with our cleaning providers to identify how we can better implement modern slavery due diligence and monitoring throughout the relationship.</p>

Supplier due diligence activities

Technology hardware	FY23 activities
<p>The technology hardware sector has a higher inherent risk of modern slavery, due to known systemic labour issues within the industry. The issues within the industry are attributed to the low-skilled nature of work and the low-cost model of the industry, resulting in a heightened vulnerability to exploitative labour practices. There is a high-risk of forced labour and debt bonded labour in the making of electronic parts and a high-risk of child labour in the mining of raw minerals (for example, conflict minerals) used to make electronic components.</p> <p>Technology hardware is a high priority area for EY due to the level of risk in the industry, the country risks associated with where parts and products are manufactured, and the importance of technology to our business. We rely on a range of technology hardware products to carry out our operations, including laptops, monitors and associated items, which we purchase from large international technology companies. The manufacturing of these products and their parts often occurs in countries with a high inherent risk of modern slavery, such as China, India, Taiwan, Brazil, Mexico, Malaysia and Thailand.</p> <p>While our suppliers generally have programs in place which seek to manage labour rights issues, we consider that this area of our supply chain presents a high-risk of modern slavery. Through our activities we seek to assess the effectiveness of those controls to gain comfort as to whether labour rights issues are being managed appropriately in practice.</p>	<p>During FY23, we engaged with our largest technology hardware supplier by holding a virtual introductory session with relevant business representatives to understand the current state of modern slavery within the industry and their response to managing modern slavery.</p> <p>Further to this initial engagement, we will commence additional due diligence activities in FY24, including desktop-based assessments against our Supplier Code of Conduct, site visits and unmonitored worker interviews.</p>
Real Estate	FY23 activities
<p>The construction industry presents a high inherent risk of modern slavery and broader labour rights issues, heightened by poor visibility over long and complex supply chains, high demand for low-skilled labour, lower-tier suppliers operating in high-risk geographies and tight project deadlines. The construction industry also relies on outsourcing, increasing the complexity of operations and decreasing visibility of labour risks and impacts. This is further exacerbated by a dependence on multiple different components for manufactured products which creates inter-related supply chains.</p>	<p>During the reporting period, the Modern Slavery Program Team engaged with our in-house procurement and capital projects teams to workshop our approach to completing pilot due diligence activities for capital expenditure projects. Based on our discussions, we identified two projects for due diligence activities and engaged with one of our key project managers. Due to the timeframes for the projects, pilot due diligence activities will commence in FY24.</p> <p>Based on the outcomes of the pilot activities, we will look to implement ongoing due diligence activities throughout different stages of all EY Australia construction projects.</p>

Supplier due diligence activities

Merchandise and stationery	FY23 activities
<p>We purchase a variety of promotional merchandise such as water bottles, t-shirts, notepads and stationery for our operations and have identified that there is a high inherent risk of modern slavery for these products. This is due to known labour rights issues associated with garment manufacturing, such as excessive working hours and substandard working conditions which are attributable to the low-skilled nature of work, low-cost model of the industry and timelines for orders. Merchandise and stationery products are also typically manufactured in geographies with a higher inherent risk of modern slavery, such as China, Malaysia and India. We are committed to understanding the modern slavery controls which our merchandise and stationery suppliers have in place and to establishing further actions to mitigate and address modern slavery risks and impacts as required.</p>	<p>During FY23 the Modern Slavery Program Team engaged with the Procurement Lead for brand, marketing and communications, to fully understand the manufacturing locations of promotional items for one of our priority suppliers. This involved conducting a desktop assessment which revealed that most promotional items from this specific supplier are being sourced from China.</p> <p>Following this discovery, our plan was to send a tailored questionnaire to this supplier during FY23 to gather more detailed information about their practices related to modern slavery and sub-contracting arrangements. However, given the contract is due to go to tender in the coming year, we will incorporate modern slavery considerations as part of the tender process in FY24.</p>

Supply chain management

EY Australia considers the inherent modern slavery risk for all new suppliers during the supplier selection and onboarding process, assessed using the EY ESG Risk Tool. A centralised record is maintained by our Global Procurement function of our suppliers' inherent modern slavery risk ratings, including whether they have completed a modern slavery questionnaire as part of the onboarding process.

In FY23, the Modern Slavery Program Team worked with our Global Procurement team to enhance the supplier onboarding and management processes. The identified improvements will be implemented in FY24 with the launch of a new supplier onboarding platform, designed to improve the quality of our supplier data, to increase our understanding of the modern slavery risk profile of suppliers, and help identify suppliers with a higher inherent risk of modern slavery.

Supplier due diligence risk-based approach

— Priority suppliers

We complete targeted due diligence activities for selected priority suppliers.

— Medium and high inherent risk suppliers

New suppliers assessed to have a medium or high inherent risk of modern slavery are required to respond to a questionnaire, which our Modern Slavery Program Team reviews to gain a deeper understanding of the supplier's risk profile and mitigation measures relevant to modern slavery, following up with suppliers for additional information as required or where a red flag for further enquiry is identified.

— All suppliers

All suppliers must also agree to adhere to the EY Global Supplier Code of Conduct and all new supplier agreements (including contract renewals with existing suppliers) include a modern slavery provision, which sets out our modern slavery expectations and establishes our right to audit suppliers in relation to labour rights practices, including modern slavery.

Training

The Modern Slavery Program Team provided annual modern slavery training to all members of the Procurement Team that procure goods and services on behalf of EY Australia. This mandatory training was delivered to heighten awareness of modern slavery risks and to build capacity to drive consistent implementation of modern slavery related procurement policies and processes. The training also focused on building awareness of the EY modern slavery related minimum supplier expectations consistent with our Global Supplier Code of Conduct, and provided an update in relation to the findings of the review of the *Modern Slavery Act 2018 (Cth)*. A web-based modern slavery training module was also assigned to all team members within Legal, Talent, Workplace Services, and Brand, Marketing and Communications. As at 30 June 2023, the completion rate was 100%.

Training is planned for the Oceania Executive Leadership Team in FY24. We will also provide a webinar session for EY suppliers to build awareness of our minimum modern slavery supplier expectations and to increase capabilities to identify and address modern slavery risks.

Grievance and remediation

The EY Ethics Hotline is our established whistleblower and grievance mechanism, available to EY people, clients, suppliers and all other external stakeholders. An external independent organisation runs the hotline, ensuring confidentiality, and allowing for reports to be raised anonymously. Our Risk Management Team is responsible for overseeing the hotline and ensuring that all reports are investigated and responded to appropriately, led by the EY Risk Management and Independence Leader, Oceania. We improved the characterisation of grievances received through the EY Ethics Hotline within the reporting period which will be implemented in FY24. This will assist us in the identification of broader human rights issues received through the hotline. EY Australia also has other internal processes which employees can use to report an issue or to make a complaint, such as through our Talent Specialist, Legal or Risk Management teams or through our Welfare Contact Officers who play an important role in supporting our people who are experiencing behaviours that may infringe our Workplace Behaviour Policy, Global Code of Conduct or other EY policies.

During the reporting period, no reports of modern slavery practices, such as forced, bonded or child labour, or any other forms of modern slavery, were received by EY Australia.

The EY Australia process for responding to and remediating modern slavery incidents forms part of our complaint's investigation and escalation process. Further to this, our Whistleblowing Policy sets out the principles for making, receiving, investigating and addressing reports. Our Risk Management Team is responsible for investigating any reported modern slavery incidents and, in consultation with our Modern Slavery Program Team, determining the escalation steps required. During the reporting period, we established our Human Rights and Modern Slavery Working Group to improve oversight over modern slavery and broader labour rights issues. Our working group meetings and ongoing collaboration and consultation between the Modern Slavery Program Team and Risk Management Team supported an increasing awareness of how modern slavery and human rights issues should be escalated throughout the business. We are committed to ensuring that all reports are appropriately heard, investigated and remediated as required.

Culture Review and grievances

The Culture Review (discussed in further detail on pages 24 and 25) found that within EY in Oceania there is low trust in our reporting mechanisms, meaning people are seeking to resolve issues without access to specialist support or formal investigation.

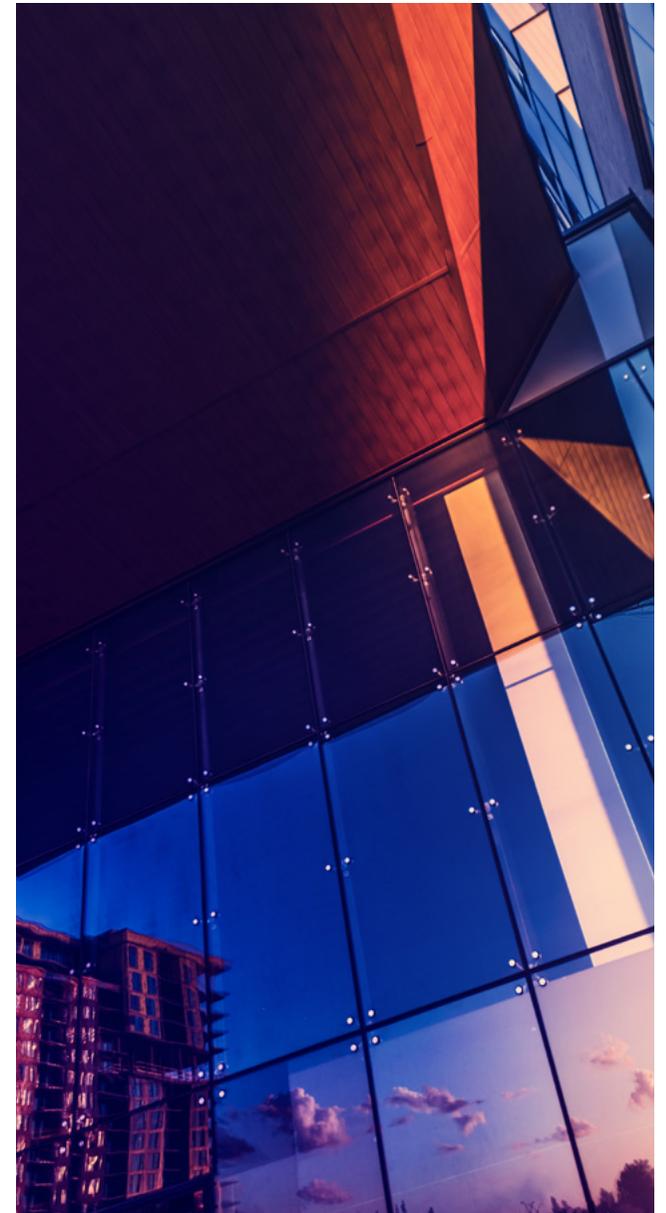
The review also found that some people have experienced retribution when formally or informally reporting harmful experiences. This has likely resulted in underreporting of issues, regardless of access to grievance and other internal mechanisms. This is supported by the limited number of reports related to working hours received through the EY Ethics Hotline, with only one report received in FY23, inconsistent with a key finding of the culture review that long working hours and overwork are a critical issue.

We recognise that our grievance mechanisms may not always be effective in receiving and responding to issues. We are committed to taking steps so that our grievance mechanisms are trusted and accessible to EY people in the future, including by implementing the recommendations contained in the EB&Co report.

Our clients

EY is a global leader in assurance, tax, transactions, and advisory services with experiences as a reporting entity and through our role assisting clients with modern slavery related services delivered by our Climate Change and Sustainability Services team. The Climate Change and Sustainability Services team help businesses to understand and respond to the risks and opportunities of sustainability related issues across their value chains, including human rights. Through the work of our global team of human rights practitioners, we are committed to contributing to the protection and promotion of human rights throughout supply chains. The Climate Change and Sustainability Services team has provided human rights advisory services to businesses for the past 15 years, helping to create positive social impacts by developing tools to better tackle modern slavery risks and impacts. We are continually learning about how we can improve the response to modern slavery, to drive action to identify and respond to modern slavery, and to create long-term value for clients, people and society.

EY Australia may be directly linked to modern slavery impacts through the provision of our services if our clients are associated with modern slavery practices in their operations or supply chain. This risk is heightened in instances where we have lower visibility over the business model of a client. To manage these risks, we consider the risks in associating with and providing services for a specific client in our engagement acceptance procedures and have included a set of principles for sensitive engagements which consider the alignment of our clients' practices to our values. We will seek to better understand how EY services, and the clients receiving them, interact with human rights and the public interest at an individual and systemic level.

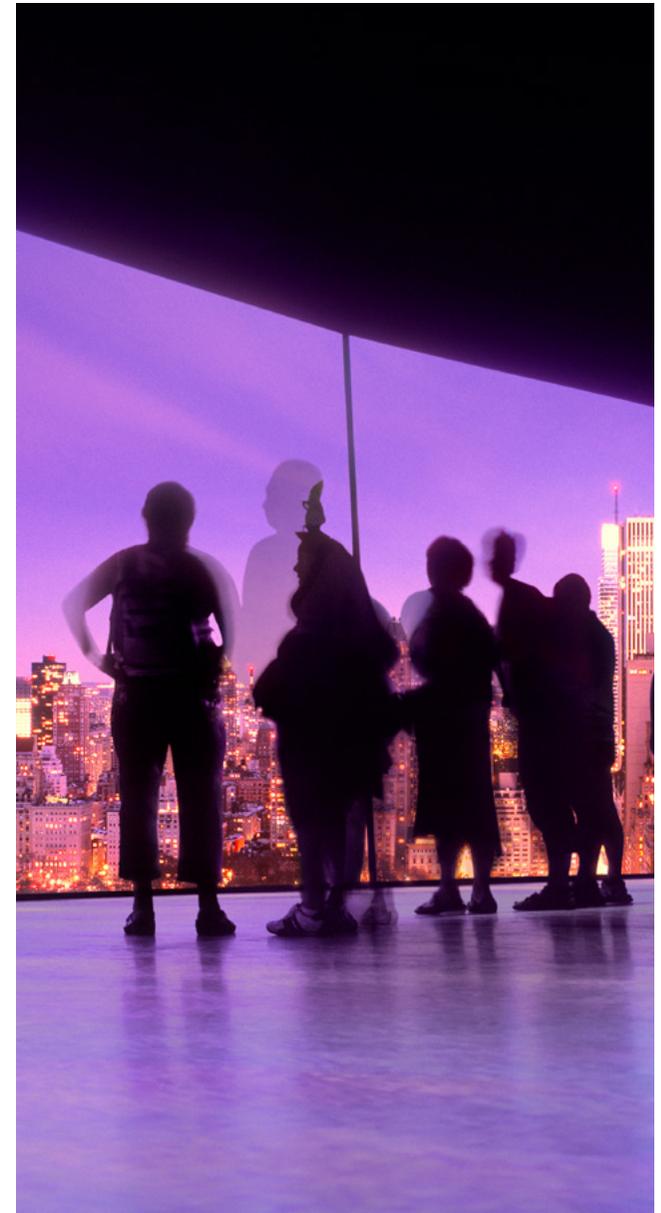


EY affiliates, EY community engagement, regulators, and civil society

EY Australia is also involved in raising awareness of modern slavery and broader human rights related issues and to contribute to responding to those issues through our wider business relationships and networks. This included collaborating with the United Nations Global Compact Network Australia to launch a guidance publication, *Reducing Emissions and Respecting Human Rights*, for Australian small and medium-sized entities (SMEs), which outlines practical steps to take in respecting human rights throughout the decarbonisation process.

EY Australia also submitted a response to the *Review of the Australia's Modern Slavery Act 2018 Issues Paper* to offer its views on the operation of the Act over the past three years. In our submission we noted our strong support for the intent of the Act, however, emphasised the need to drive more substantive in-country investigation of modern slavery risks and to reform underlying business choices that have created an enabling environment for modern slavery. We made a range of recommendations inclusive of reporting frameworks, reporting entities, due diligence activities and the establishment of an Anti-Slavery Commissioner. We are optimistic that with some enhancements, the Act can be an effective tool in addressing modern slavery throughout the Australian economy.

In November 2022, members of our Human Rights and Modern Slavery Working Group attended the 11th United Nations Forum on Business and Human Rights hosted in Geneva. Delegates heard from a diverse representation of people from international and civil society organisations, academia, the private sector, human rights defenders and impacted rightsholders. The opportunity to engage with experts on human rights gives us the space to think deeply on the role that businesses have in taking accountability for human rights violations within activities and relationships. These insights enable us to stay at the forefront of the action and help to inform our approach to better tackling human rights and modern slavery risks within our operations and the operations of our clients.



08

Our approach to
assessing the
effectiveness of
our program

08 Our approach to assessing the effectiveness of our program

We are focused on continuously strengthening our response to assessing and addressing modern slavery risks. We consider an effective response to modern slavery as one where potential and actual risks of modern slavery are identified throughout our value chain, allowing the mitigation and remediation of modern slavery and labour rights exploitation.

Modern slavery is often hidden, making it challenging to determine the impact of actions and initiatives. Quantitative indicators such as high levels of compliance with modern slavery clauses in supplier contracts or high completion rates of modern slavery training do not necessarily reflect a change in practices to eliminate modern slavery and exploitative practices.

In FY23, we assessed the effectiveness of our modern slavery program activities through measurement indicators. These are included in the table to the right and are discussed throughout the Statement.

We are in the process of developing our outcomes measurement approach to measure not just the output of our actions but the outcomes we seek to achieve. These will also be informed by lessons learned and outcomes from our consultation with rightsholders from our FY23 targeted due diligence activities with offshore operations and outsourced service providers, and planned supplier engagement in FY24.

Pillar	FY23 key measurement indicator	Further information
Governance	Our Human Rights and Modern Slavery Working Group, met three times within the reporting period.	Pages 16 and 17
Due diligence activities for operations	Independent Review into Workplace Culture at EY Oceania commissioned and completed. EY Leadership has committed to implementing all recommendations.	Pages 24 and 25
	Conducted in-country physical site visit over one outsourced service provider.	Page 27
	Conducted in-country assessment over one offshore EY member firm.	Page 27
Supply chain due diligence activities	Sent self-assessment modern slavery questionnaires to eight cleaning providers.	Page 30
	Engaged key project manager for upcoming major capital works.	Page 31
	One initial engagement held with largest technology hardware supplier to understand approach to modern slavery risk management.	Page 31
	Desktop assessment of merchandise and stationery supplier.	Page 32
Grievance mechanism and remediation	No cases of modern slavery (actual or suspected) reported.	Page 34
Capacity building	Annual procurement training conducted, attended by 10 Supply Chain Services team members. Feedback from the training indicated a general increase in awareness on modern slavery risks and the controls that EY Australia has in place to manage and mitigate modern slavery risk. Areas of improvement include the inclusion of case studies and actions taken to prevent modern slavery from occurring.	Page 33

09

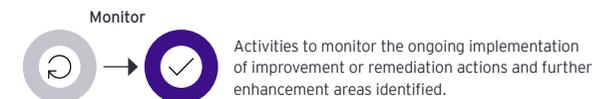
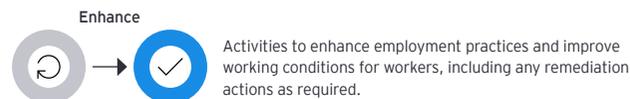
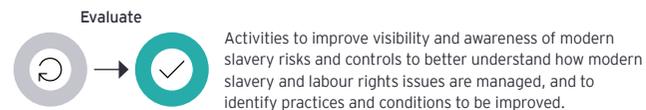
Our actions
for the future

09 Our actions for the future

Our modern slavery program is ongoing and we continue to complete due diligence activities and make progress in our review and enhancements, informed by our activities. We have made progress on our actions during the reporting period, however, acknowledge that we have a lot more to do to help us meaningfully address modern slavery impacts. Our priority actions for FY24 are set out in the following tables. We will provide an update on our progress in relation to our actions in the next reporting period.

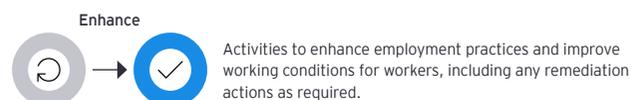
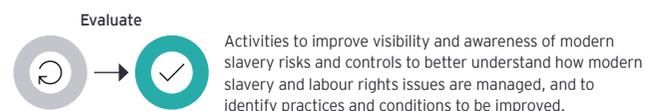
Due diligence activities

Pillar	Priority area	Where we are now (FY23)	Commitment	Description	Where we will be (FY24)
Operations	Offshore member firm	 Evaluate	We will conduct an in-country assessment over a second offshore EY member firm.	Our in-country assessment will allow us to observe the working environment and perform unmonitored interviews with personnel. Findings and recommendations will be used to determine improvement activities, where required.	 Evaluate
	Offshore member firm	 Evaluate	We will finalise observations and recommendations, and monitor the implementation of improvement activities as appropriate.	We will continue to collaborate with our offshore member firm as we finalise outcomes of due diligence activities, and perform ongoing consultation and monitoring activities with EY member firms in relation to any required improvement activities.	 Enhance
	Outsourced service provider	 Evaluate	We will finalise observations and recommendations, and monitor the implementation of improvement activities as appropriate.	We will continue to collaborate with our outsourced service provider as we finalise outcomes of due diligence activities, and perform ongoing consultation and monitoring activities with our outsourced service provider in relation to any required improvement activities.	 Enhance



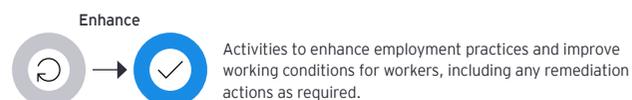
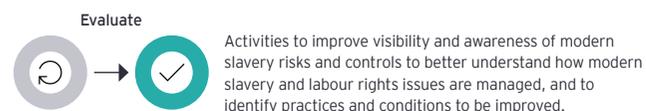
Due diligence activities

Pillar	Priority area	Where we are now (FY23)	Commitment	Description	Where we will be (FY24)
Operations	Outsourced service provider	 Evaluate	We will continue engagement with our outsourced service provider to inform appropriate level of additional due diligence to be conducted.	Engagement with selected outsourced service providers will allow us to better understand how modern slavery risks are managed to identify the level of additional due diligence to be conducted and any required improvement activities.	 Evaluate
	Technology hardware provider	 Evaluate	We will conduct targeted due diligence activities over identified technology hardware suppliers.	Advancing our engagement with our largest technology hardware supplier, consulting with key personnel to further understand the systemic issues driving labour exploitation within the technology hardware value chain, and a factory site assessment to observe and assess working conditions.	 Evaluate
Supply chain	Cleaning service providers	 Evaluate	We will conduct pilot due diligence activities over a selected cleaning service provider.	Pilot due diligence activities over selected cleaning service provider will include consultations with key EY team members, assessment of existing controls to mitigate and address risks and impacts, stakeholder engagement to further understand risk profile, and site visit to assess working conditions.	 Evaluate



Due diligence activities

Pillar	Priority area	Where we are now (FY23)	Commitment	Description	Where we will be (FY24)
Supply chain	Merchandise provider	 Evaluate	We will commence additional due diligence activities over our primary merchandise supplier to identify actual impacts and controls.	Modern slavery due diligence activities over our primary merchandise supplier will include an assessment of existing modern slavery controls, stakeholder engagement to further understand risk profile, and a site assessment to observe working conditions and review relevant records.	 Evaluate
	Real estate	 Evaluate	We will commence pilot due diligence activities over selected capital expenditure project.	Pilot due diligence activities over upcoming capital expenditure projects may include site visits to assess high-risk materials and products, and to observe conditions.	 Evaluate



Modern slavery program enablers

Pillar	Commitment	Description
Governance	We will continue to consult and collaborate with EY member firms in other geographies to continue to improve how we manage our modern slavery risks and impacts as a global business.	Through our Modern Slavery Program Team and our Human Rights and Modern Slavery Working Group we will continue to work with other EY member firms to better manage modern slavery risks at EY. This may include establishing a global EY process or internal audit program for assessing modern slavery risks and impacts.
Grievance mechanism and remediation	We will continue to enhance our grievance and remediation processes to improve how we record and respond to human rights and modern slavery related complaints.	We will continue to seek opportunities to enhance how human rights and modern slavery complaints are categorised and recorded to ensure we maintain an active view over the types of issues, including any key trends, relating to labour rights issues to enable continual program enhancements. We are also exploring ways to gain greater oversight over grievances raised with other EY member firms.
Assessing effectiveness	We will continue the development of a framework to assess the effectiveness of our modern slavery program in identifying and addressing risks within our operations.	We will continue to develop an outcomes measurement approach and framework to better assess the design and operational effectiveness of the modern slavery program to achieve overarching objectives, protect and promote decent work, and to contribute to the eradication of modern slavery.
Capacity building	We will work with EY team members and external suppliers to improve both understanding of modern slavery risks and the ability to respond to those risks.	We will continue to increase awareness of modern slavery risks through annual modern slavery training for our Procurement team members, capacity building sessions with relevant business functions and the Oceania Executive Leadership Team, and webinar sessions for EY suppliers to build awareness of the EY minimum standards and to increase capabilities to identify and address modern slavery risks.
Data enhancements	We will begin mapping tier two EY Australia suppliers.	We will commence mapping our tier two suppliers associated with priority tier one suppliers to improve our understanding of modern slavery risks within our supply chain, allowing us to better address it and inform our due diligence activities. This includes obtaining higher quality supplier information through the introduction of our new supplier onboarding platform.
Client engagement terms	We will update our general terms and conditions for client engagements to include modern slavery considerations.	We will include modern slavery considerations in our general terms and conditions for client engagements to help us to better address modern slavery risks.

EY | Building a better working world

EY exists to build a better working world, helping to create long-term value for clients, people and society and build trust in the capital markets.

Enabled by data and technology, diverse EY teams in over 150 countries provide trust through assurance and help clients grow, transform and operate.

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