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Abt Global Australia and Abt Global Britain Modern Slavery Statement

Reporting period: April 2025 to March 2026

Approved and signed:

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MODERN SLAVERY STATEMENT

Introduction

Commitment

Abt Global is committed to the elimination of all forms of modern slavery within our operations and supply chain. As an expression of our commitment, Abt Australia is a signatory to the United Nations Global Compact (UNGC) and supports the Ten Principles of the UNGC 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 committed to continual improvement so that our policies, procedures, and processes remain proportionate to the risk of modern slavery in our operations and supply chain, with the aim to prevent, identify, assess, and address modern slavery practices.

Reporting Period and Scope

This statement sets out actions taken to assess and address modern slavery risks in Abt Australia's and Abt Britain's (together, the **Group**) operations and supply chain for financial year starting 1 April 2025 and ending 31 March 2026, pursuant to the Australian Modern Slavery Act 2018 *(Cth)* and the Modern Slavery Act 2015 (*UK*). Where relevant, information about actions taken beyond this reporting period has also been included.

Reporting Entities

This joint statement is prepared and submitted by Abt Associates Australia Pty Ltd (A.C.N. 161 695 156) on behalf of the following reporting entities which are wholly owned subsidiaries: (1) Abt Holdings Australia Pty Ltd (A.C.N. 129 332 681); (2) Abt Group Australia Pty Ltd (A.C.N. 120 662 026); and (3) Abt Associates Pty Ltd (A.C.N. 091 591 294) for the Australian Modern Slavery Act 2018 *(Cth).* Abt Britain Limited (Company Number 10633588) (**Abt Britain**) was also a wholly owned subsidiary of Abt Associates Australia Pty Ltd during the reporting period; this statement is submitted for the Modern Slavery Act 2015 (*UK*).

The Group is wholly owned by Abt Global LLC (SF#2735058), a company incorporated in the State of Delaware in the United States of America (**Abt Global**).

Abt Associates Australia Pty Ltd has prepared this statement in consultation with the reporting entities listed above.

Abt Associates Australia Pty Ltd and its Australian reporting entities are collectively referred to as Abt Australia in this statement. Abt Australia owns and controls other entities to facilitate the delivery of services in its home office locations and overseas. A joint statement has been prepared because these entities use the same policies and processes, operate in the same sector, and have shared suppliers.

Abt Britain has adopted Abt Australia's compliance framework and has comparable policies and procedures as Abt Australia, operates in the same sector, and has comparable procurement needs.

The Abt Australia and Abt Britain boards comprise the same directors and company secretary.

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About Us

Our Mission

Abt Global is a mission-driven company working in partnership with governments and communities to help create a more equitable, prosperous and sustainable future for people worldwide.

Drawing on 60 years' experience, Abt Global designs, tests and applies evidence-based approaches to development challenges – from design to implementation and technical assistance through to evaluation. Abt Global has expertise in governance, economic growth, health, education, gender equality, disability and social inclusion, climate and environment, monitoring, evaluation and learning, and infrastructure.

Abt Australia manages complex development programs on behalf of clients including the Australian Department of Foreign Affairs and Trade, Asian Development Bank, and various Australian state governments. We operate in Papua New Guinea, Fiji, Timor-Leste, Solomon Islands, Vanuatu, Tonga, the Philippines, Sri Lanka, Indonesia, Vietnam and Cambodia. Abt Britain is based in the United Kingdom with overseas operations in Asia and Africa during the reporting period.

Our ability to deliver on our mission is underpinned by strong corporate systems that allow us to deliver strong strategic oversight and high-quality program management.

Operations and Supply Chain

The Group's operations include direct employment of workers, predominantly in professional services roles, with provision of program management services and specialist advisory services including but not limited to governance and public sector reform, health services, policy and systems, research monitoring and evaluation, and gender equality and social inclusion. As part of our program management services, we may manage the following on behalf of our clients: procurements (including of technical assistance), grants, delivery of remote health services, subcontracting of construction projects, security and/or subcontracting of local security services, impact investing, and behavioural change initiatives.

The Group's supply chain is dispersed across the regions outlined above – where possible, we aim to bolster locally led development by prioritising local organisations and suppliers in delivering programs and investing in their long-term capacities. In addition to standard procurement required to support a professional services firm, the supply chain also consists of downstream partners engaged to support delivery of international development programs overseas. The diverse supply chain includes NGOs, research institutions and universities, consultancy companies, church partners, local in-country suppliers, travel and accommodation providers, security firms, construction and infrastructure-related companies, and suppliers of medical and IT equipment and consumables.

Assessing Risks of Modern Slavery Practices

Risk Assessment and Consultation

The Group started systematically assessing the risk of modern slavery practices in its operations and supply chain in 2020, and we have continued to build on that foundation. We recently shifted management of modern slavery risk to our Ethics, Compliance, Risk and Assurance Department, providing us with the opportunity to uplift our modern slavery framework by better integrating it with Abt's risk management approach which is aligned to the principles of ISO 31000 risk management standard. Abt's risk management approach provides a robust framework for risk identification, risk assessment, response, implementation, monitoring, review and reporting across

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all operations, program activities and functions. In addition, we refined and further standardised the way we measure the likelihood of modern slavery practices in our operations and supply chain. We have detailed our journey and recent efforts below.

Company-wide Risk Assessment started in 2020

In 2020, the Group conducted an initial company-wide risk assessment. Resources were dedicated to understanding key risk factors related to modern slavery, including the ILO indicators of forced labour, and private sector best practice in managing and mitigating the risk of modern slavery practices in operations and supply chains. Briefing sessions were held to ensure program and home office personnel informing the group wide risk assessment were briefed on the key risk factors.

All programs and home office locations completed a local risk assessment (inherent risk evaluation only) pertaining to their local operations and supply chain and informed by their country/regional context. These local risk assessments were then analysed and consolidated to produce the Group's overall risk assessment. Consultation with overseas entities owned and controlled by Abt Australia and Abt Britain was conducted at the program level as the overseas entities are set up to facilitate the delivery of programs overseas. Australia-based entities owned and controlled by Abt Australia were represented by the higher entity.

The company-wide risk assessment has been reviewed by key stakeholders each year up until 2025. As part of their review, they consider whether there have been material changes to the environment/context (e.g. new programs awarded) and our ways of operating that would change or impact the likelihood or severity of modern slavery in our operations and supply chain. These key stakeholders represented home office and program locations, with executive responsibilities for operations and safeguarding. Over the years, no material changes to the Group's overall modern slavery risk profile have been identified.

New Risk Context Tool

With over half a decade of lessons to draw on, this calendar year, we developed, piloted and implemented a new modern slavery risk context tool for Abt Australia. This new tool further standardises the way we measure the likelihood of modern slavery practices in our operations and supply chain, and is aligned with our broader ISO 31000 aligned risk management framework. Our focus on refining the way we measure likelihood instead of consequence, reflects the fact that the impact of modern slavery on individuals and communities is always severe and unacceptable.

Each program's modern slavery risk context rating translates to a likelihood range when the risk of modern slavery is recorded in the program's risk management system. The risk context rating is comprised of the following components: the country risk level and sector risk level. Abt Australia's methodology for determining country risk levels is informed by the 'Global Slavery Index 2023 Dataset', Walk Free, Minderoo Foundation, available from www.globalslaveryindex.org.[1] The Global Slavery Index (GSI) is the only research of its kind to measure the number of people living in modern slavery country by country. The regional estimates in the 'Global Estimates of Modern Slavery: Forced Labour and Forced Marriage' by the International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), Geneva, 2022, form the starting point for the national level estimates in the GSI.

Country risk ratings are informed by ratings from the GSI and tailored to Asia and the Pacific. For example, out of the countries in Asia and the Pacific which had a prevalence score assigned in the

[1] Use of the Global Slavery Index is governed by the Global Slavery Index Data License. This includes reproducing and distributing the work in whole or part and creating derivative works.

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Global Slavery Index, Papua New Guinea ranked 5th out of 27, placing it within the top third in the region for prevalence of modern slavery. For vulnerability, it ranked 3rd out of 27, placing it within the top third in the region for vulnerability to modern slavery. Finally, for government response, it ranked 27th out of 33, placing it in the bottom third in the region. These rankings result in the overall country risk rating of high.

For sector risk ratings, Abt Australia's methodology for determining sector risk level is informed by publicly available information on modern slavery sector risks. For the vast majority of our programs, the sector risk rating is low as they primarily provide policy advisory and technical assistance, research, and professional services such as project management.

For clarity, the tool was developed and piloted during the reporting period but implemented after the reporting period. Existing programs were given the opportunity to either review their existing modern slavery risk assessment or complete the new tool while new programs were required to complete the new tool.

While there have not been material changes to Abt Australia's modern slavery risk profile in this reporting period, and no material changes since the initial risk assessment was conducted in 2020, we expect the recent further standardisation of how we measure likelihood of modern slavery practices to support our efforts to review and refresh our broader framework for managing modern slavery risk.

Findings

While most of our programs operate in medium- to high-risk countries, most of them tend to primarily focus on policy advisory and technical assistance and professional services, which is generally regarded as a low-risk sector. We assess the risk of Abt causing, contributing to or being directly linked to modern slavery practice as being higher within our supply chains rather than in direct operations.

Key risk sources include:

- Lack of transparency in the supply chain and procurements from high-risk locations and high-risk industries, particularly for programs with suppliers in the construction industry.
- Prevalence of modern slavery in the Asia Pacific region – the region accounts for 59% of the global estimate (even though it only accounts for 56% of the world's population). It also has a high prevalence of forced labour compared to other regions. For example, Abt Australia has programs in Papua New Guinea and the Philippines where the estimated prevalence of modern slavery victims per 1,000 population are 10.3 and 7.8, respectively.[2]

Addressing Risks of Modern Slavery Practices

With the integration of modern slavery risk management into the broader Ethics, Compliance, Risk and Assurance Department portfolio, we are reviewing and refreshing how we address the risk of modern slavery practices in our operations and supply chain. As part of this broader review and refresh exercise we are exploring ways to better integrate it with Abt's risk management approach which is aligned to the principles of ISO 31000 risk management standard. To this end:

[2] The Walk Free Foundation, 2023 Global Slavery Index: Asia and the Pacific Report (accessed 31 August 2026) Global Slavery Index by Country 2026

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- We have introduced a new program risk context tool which is described above. The piloting of this new tool occurred during the reporting period, while the implementation of it occurred afterwards.
- We require each Australian program to capture the risk of modern slavery in their risk register. Abt Australia's risk management system provides consistency with evaluation and terminology, as well as governance oversight of the program's risk register. It also ensures that modern slavery risks are not managed in isolation but are integrated into the program's overall risk management activities, ensuring ongoing governance and oversight.
- For new programs, during the inception phase, the Senior Director ECRA will support the program to develop their risk profile and ensure that modern slavery risk is assessed and informs the program's overall risk profile.
- We have introduced a dedicated modern slavery incident management procedure to support our modern slavery policy. Planning for this occurred during the reporting period but it was launched after the reporting period.
- We have reviewed the languages available through our third-party managed reporting hotline and activated additional languages to ensure community members across our working locations have an accessible mechanism to report suspected incidents.
- We already cover basic modern slavery training as part of our mandatory safeguarding module which is completed annually by all staff. However, we have also introduced role-based training for select programs and locations.
- We have engaged a business and human rights consulting firm to develop and deliver modern slavery incident management training to all program safeguarding officers.
- We plan to review our modern slavery policy to determine if it continues to remain risk-proportionate and aligned to our commitment to respect human rights and international standards on human rights due diligence.

Modern Slavery Policy Requirements

Under Abt Australia and Abt Britain's Modern Slavery and Human Rights Abuses Policy,

- Human rights abuses, including any form of modern slavery and human trafficking, are strictly prohibited regardless of jurisdiction in which Abt or its programs are registered or doing business.
- Abt is committed to ensuring transparency including our disclosure obligations under the Australian Modern Slavery Act 2018 and the UK Modern Slavery Act 2015 and expects the same high standards of all our partners.
- Abt personnel working in high-risk countries, sectors and in the procurement of goods or services are expected to be particularly vigilant for signs of modern slavery in Abt's supply chain.
- Further, Abt personnel are prohibited from procuring commercial sex acts; using forced labour; and conduct which can contribute to modern slavery and human trafficking such as:
  - destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents
  - charging employees recruitment fees
  - failing to provide return transportation or pay for the cost of return transportation upon ending of employment for any employee who is not a national of the country in which the

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work is taking place and who was brought into that country for the purpose of working on an Abt contract or subcontract.

Related interventions that support implementation of the policy are outlined below, including the dedicated modern slavery incident management procedure, training approach, safeguarding code of conduct and more.

Spotlight on Incident Management

In this year's statement, we shine the spotlight on our new dedicated modern slavery incident management procedure. It aligns with the United Nations Guiding Principles (UNGP) on Business and Human Rights and reflects Abt's commitment and responsibility to respect human rights.

The incident management procedure consists of the following parts:

1. **Grievance mechanism** – a grievance or report triggers incident management processes
2. **Incident management** coordinates the organisational response
3. **Response and remedy** addresses harm to people.

Mandatory Reporting

Abt requires all personnel to immediately report any suspected, alleged or known incidents or concerns of modern slavery or human rights abuses related to Abt's operations or supply chain. This includes situations where personnel have received a report or information from grantees or partners. However, personnel are advised to not intervene directly, as this may place affected individuals at greater risk. The safest outcome for Abt Personnel and the potential victim(s) should be prioritised when reporting concerns.

Early identification enables timely response, and remediation, reducing risk of harm escalating.

Reporting Channels

Abt Global Reporting Hotline

Web: https://abt.ethics.help/

Toll-free phone: +1 202-929-0595

Available 24 hours a day,
7 days a week

Abt's modern slavery and human rights abuses grievance channels are available to all personnel, partners, individuals within our operations and supply chains, and the broader community. All reports received will be reviewed and taken seriously. Abt provides multiple reporting channels including the Abt Global Reporting Hotline (hosted by a third-party provider, Ethicontrol). This provides an anonymous reporting option with multi-language support available via web and phone (toll-free hotline available from all countries).

Investigation and Support

There are two parallel objectives in this phase of the incident lifecycle:

(1) **support and protect** the reporter and victim-survivor(s), and

(2) **investigate** the report (investigation function).

Investigations will be conducted in a timely manner proportionate to the complexity and risk of each case. Abt requires investigations to be objective, fair and independent, while prioritising the safety and human rights of the reporter and victim-survivor(s), ensuring a survivor-centred approach.

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Respond and Remediate

As recognised in Principle 22 of the UNGP on Business and Human Rights, "even with the best policies and practices, a business enterprise may cause or contribute to an adverse human rights impact that it has not foreseen or been able to prevent". Abt will seek to provide or support remediation for harms that it has caused, contributed to, or that are directly linked to Abt. Response and remediation actions will be determined based on level of involvement, influence and leverage, as well as the severity and nature of harm.

Other Interventions

Awareness Training

All personnel receive modern slavery awareness training as part of their safeguarding training at induction and annually. This includes Abt's Safeguarding Officers, who are already highly skilled in child protection (CP) and protecting individuals from sexual exploitation, abuse and harassment (PSEAH), to ensure they are cognisant of the warning signs of modern slavery.

Where deemed required, Abt is also delivering role-based training to HR personnel, procurement staff and safeguarding officers. Targeted training ensures personnel are equipped with practical, context-specific capabilities to identify and manage risks.

Safeguarding Code of Conduct

Abt's multi-pronged approach to safeguarding addresses unequal power dynamics and vulnerabilities that are also relevant to combatting modern slavery, as well as more broadly preventing exploitation and abuse of individuals. Our commitment to child protection (CP) and the prevention of sexual exploitation, abuse and harm (PSEAH) is embedded in organisational practice and workplace culture; and clearly communicated to staff, contractors, partners, and communities associated with our programs in all contexts.

Abt Australia's and Abt Britain's Safeguarding Codes of Conduct prohibit personnel from: engaging in any sexual relationships with beneficiaries of assistance (as they are based on inherently unequal power dynamics); and hiring children for domestic or other labour, which is inappropriate given their age and developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury. These standards of conduct contribute towards a safer environment for all, aimed at reducing the risk of sex trafficking, and the worst forms of child labour.

Procurement Due Diligence

As is common for many companies, the risks of modern slavery practices are highest in our supply chain. We have in place baseline and comprehensive due diligence assessments when engaging downstream partners as part of our procurement management. Currently, our baseline due diligence measures include:

- Abt Britain's procurement policies and processes follow the FCDO Supply Partner Code of Conduct and other client contract requirements, including safeguarding checks when undertaking UK Government-funded procurement.
- Abt Australia's procurement policies and processes follow the principles of the Commonwealth Procurement Rules and other client contract requirements, including CP and PSEAH risk-based assessments and control strategies when undertaking Australian Government-funded procurement.

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- The due diligence framework requires that all downstream partners are checked against sanctions lists, such as the World Bank Listing of Ineligible Firms and Individuals and the Asian Development Bank Anticorruption Sanctions List. This prevents funds being diverted to terrorist organisations or individuals, who may engage in modern slavery practices to fund or further their objectives. We are aware that there is a growing nexus between modern slavery and terrorism.
- Online check of downstream partners prior to contracting to check if the entity is associated with modern slavery practices or human rights abuses.

Program-level Modern Slavery Risk Management Plans

While actioned after the reporting period, it is relevant to mention that Abt has developed program-level modern slavery risk management plans when deemed required. This has included a program in Papua New Guinea and one in the Philippines. Each program's Modern Slavery Risk Management Plan is underpinned and complemented by Abt's policies and procedures, particularly:

- Modern Slavery and Human Rights Abuses Policy
- Incident Management Procedure – Modern Slavery
- Entity Risk Management Framework.

These governing frameworks have been described above.

Measuring Effectiveness

Abt Australia and Abt Britain gauge the effectiveness of actions taken to combat modern slavery by measuring:

- Percentage of programs and home office locations that provide input into assessing risk of modern slavery across operations and supply chain
- Percentage of personnel who completed training on modern slavery during the annual safeguarding training refresher.

As part of our review and refresh of the broader modern slavery framework, we will also review how we measure and monitor effectiveness of actions taken to identify, assess and address modern slavery.

Summary of Actions during this Reporting Period

As described above, Abt undertook the following activities during this reporting period:

- Piloted a new program risk context tool for modern slavery, and introduced it after the reporting period
- Planned for a new dedicated modern slavery incident management procedure during this reporting period, and developed and implemented it after the reporting period
- Ongoing integration of modern slavery risk management into overall risk management activities ensuring ongoing governance and oversight
- Continued delivery of modern slavery training as part of the safeguarding mandatory training refresher

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- Ongoing mandatory training delivered to personnel on the Abt Global Code of Conduct. The global Code of Conduct specifically prohibits modern slavery and activities related to modern slavery.

Statement Preparation and Approval

This statement was prepared by Abt's Compliance and Modern Slavery Lead, Lisa Hollyer, and approved by the board of Abt Associates Australia Pty Ltd on 23 September 2026 | 09:36 AEST, on behalf of each of the reporting entities it owns and controls.

This statement was approved by the board of Abt Britain Limited on 23 September 2026 | 09:36 AEST, on behalf of each of the reporting entities it owns and controls.

Signed,

Signed by:
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James Gilling

Regional Vice President East Asia and Pacific and

Director, Abt Australia