



ENGINEERS
AUSTRALIA

Modern Slavery Statement

Modern Slavery Statement 2025

Introduction

As the national voice and champion for engineers in Australia, Engineers Australia empowers more than 140,000 members with the resources, connections and opportunities needed to deliver ethical, competent and high-value work that enriches our communities. We provide a supportive pathway for graduates, setting them up for success from the outset. Throughout their careers, engineering professionals can enhance their skills, explore new horizons and realise their full potential through our comprehensive support. Our Chartered credentials offer international recognition and career prospects, opening doors to global opportunities and underscoring our commitment to excellence in engineering.

Engineers Australia is committed to upholding the highest standards of ethical conduct and human rights. We recognise the importance of addressing modern slavery risks within our operations and supply chains. This statement outlines our efforts to identify, mitigate and prevent modern slavery practices in accordance with the Modern Slavery Act 2018 (Cth) (the Act)

Our Commitment

This statement sets out our proposed processes, systems and actions to tackle modern slavery, as well as targets we have set ourselves to build on. We have started implementing many of the targets we have set ourselves and we will be reporting on those in our next Modern Slavery Statement, in line with the reporting timelines under the Act.

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1. The reporting entity and our corporate structure

This Modern Slavery Statement is submitted by The Institution of Engineers Australia (ABN 63 020 415 510), Engineering Education Australia Pty Ltd (ABN 45 008 663 349) and EngInsure Pty Limited (ABN 82 610 649 851) as the reporting entity under the Modern Slavery Act. Engineers Australia does not own or control any other operating entities.

The Institution of Engineers Australia is a non-for-profit membership organisation that operates in all states and territories of Australia, with some affiliations in overseas countries. Engineers Australia's organisation structure is built upon a governance model that includes a Board of Directors, National Congress, and various committees, Technical Societies and subsidiaries. Operations and Supply Chain

Our supply chains encompass a wide range of goods and services, our direct suppliers of services and products are situated in Australia, although various products we source through our suppliers, may be sourced outside of Australia. We have identified our current supply chains as follows:

- Training and Teaching services
- IT Equipment and services
- Publishing and Printing Services
- Travel and Conferencing/Venues
- Facilities Management
- Recruitment Services
- Office Supplies and Consumables
- Consultants and Contractors

Engineers Australia employs over 450 team members collectively, in which 57.2% are women, Engineers Australia has branches in every state and territory, including meeting facilities in most locations that members can book and use when they need.

2. Identifying modern slavery risks

Engineers Australia will begin a proactive and structured approach to identify modern slavery risks within our operations and supply chains through a modern slavery questionnaire delivered to all our current suppliers. After collating the data, an internal committee will be established within Procurement and Compliance and Risk, tasked with conducting an assessment using a combination of inherent risk screening (to assess the uncontrolled state), current risk evaluation (to assess the current state) and residual risk evaluation (to assess the anticipated risk once additional controls are put in place).

The questionnaire methodology will be guided by international best practices and aligned with the Act.

Potential high-risk areas

An initial assessment has identified several potential high-risk areas relevant to our operations and supply chain. These potential high-risk areas include:

Vulnerable populations:

- **Migrant workers:** we recognise that potential migrant workers, particularly those in low-skilled or temporary

positions, are more susceptible to exploitation.

- **Young workers:** we will investigate suppliers with workers under the age of 18 as they are also vulnerable due to their potential lack of awareness and limited bargaining power.

High-risk business models:

- **Outsourcing:** further scrutiny will be needed in operations that heavily rely on outsourcing, especially in sectors with low-skilled labour, which we deem as high-risk due to the potential for less control over labour practices.
- **Complex supply chains:** we are actively looking into businesses with extensive, multi-tiered supply chains as there is an increased risk due to reduced visibility and control over suppliers' practices.

High-risk goods and services:

- **Construction materials:** a comprehensive review will be conducted within our Facilities team to gather more information about the sourcing of materials from sectors known for high-risk labour practices, such as textiles or construction materials for all our fit outs, maintenance and construction works.
- **Cleaning and maintenance services:** we are gathering information and assessing the situation where services that involve low-skilled labour, such as cleaning and maintenance, are scrutinised for potential exploitation.
- **IT hardware:** : we are reviewing our IT hardware supply chains—including sourcing of raw materials and manufacturing processes—to identify and address modern slavery risks associated with forced and child labour, particularly in high-risk regions and suppliers.

High-Risk Geographies:

- **Countries with poor labor records:** we are conducting a thorough analysis to assess the risks associated with goods and services sourced from countries known for poor labour practices or high rates of modern slavery. Through our questionnaire we will begin to find the countries being used by suppliers and are then subject to enhanced scrutiny to ensure that our supply chain does not inadvertently support unethical practices.

Residual Modern Slavery Risks

Following the launch of our questionnaire assessment, we will conduct a thorough investigation into the potential residual risks associated with specific procurement categories. Once this assessment is complete, we will identify the risks and address them through the development and implementation of targeted strategies, including

- **Supplier questionnaires:** high-risk contractors and suppliers will be required to complete detailed questionnaires about their modern slavery risk management practices. This process will enable us to assess their residual risk levels and ensure compliance with our expectations.
- **Continuous monitoring:** regular audits and monitoring will be conducted to verify supplier adherence to our standards and identify any emerging risks.
- **Capacity building:** we plan to implement training and workshop initiatives within the 2027 Financial Year with our suppliers to enhance their capacity to effectively manage modern slavery risks.

Prioritisation and management

Our approach to managing modern slavery risks involves prioritising high-risk areas based on inherent risk screening. This will allow us to focus our resources on the most critical areas and ensure our risk management activities are targeted and effective.

By integrating our modern slavery risk management into our broader risk governance framework, we ensure a comprehensive and proactive approach to addressing these risks. This structured approach enables us to report effectively against the criteria outlined in the Act and to maintain transparency with our stakeholders regarding our efforts to combat modern slavery.

Commitment to Small Business and First Nations Supplier Engagement

Engineers Australia recognises that not all businesses we engage with will be subject to the Modern Slavery Act due to their size or annual revenue. However, this does not deter us from continuing to engage with these suppliers. We remain committed to thoroughly vetting all suppliers as part of our Modern Slavery Policy.

Our procurement strategy prioritises supporting smaller Australian-owned businesses, including those owned by Indigenous and Torres Strait Islander peoples. This approach aligns with our Reconciliation Action Plan (RAP) and reflects our broader commitment to fostering economic opportunities within diverse and underrepresented communities.

3. Actions to address modern slavery risks

Engineers Australia will implement several measures to mitigate modern slavery risks, which are crucial for ensuring compliance with the Act and promoting ethical practices within our operations and supply chains.

To further strengthen these efforts, we will be adopting the following policies and procedures:

- 1. Supplier code of conduct:** We will require all suppliers where reasonable and practicable to adhere to our newly created Supplier Code of Conduct, which includes provisions on labour rights and ethical practices. This code serves as a foundational element in our commitment to preventing modern slavery. All new and current suppliers where reasonable and practicable will have to demonstrate they have read and accepted our supplier code of conduct which will be issued electronically.
- 2. Due diligence:** we will conduct thorough due diligence on new and existing suppliers, including comprehensive risk assessments and audits by our Procurement department. These processes will help identify potential risks and ensure that our suppliers align with our ethical standards.
- 3. Training and awareness:** we are creating and providing training to our staff and suppliers on modern slavery risks and our policies. This educational initiative fosters a culture of awareness and responsibility across our network.
- 4. Grievance mechanisms:** we are establishing a robust mechanism for reporting and addressing concerns related to modern slavery through our anonymous online portal, which will be obeyed by our Whistle Blower Policy. This mechanism will ensure that any issues are promptly identified and addressed.

Engineers Australia is developing a suite of policies and supporting procedures which will govern relationships and articulate our values and culture. The following table lists those most relevant for countering human rights risks among our team members, volunteers and broader stakeholders in our supply chain:

Policy and procedure	Purpose
Code of conduct	Establishes proper conduct and practices, including ethical and moral principles Engineers Australia's expects all team members to comply with. The code also applies to suppliers.
Equal employment opportunity policy	Promotes the right for every employee to be treated fairly and equitably and to have equal access to resources and opportunities.
Sexual harassment policy	Promotes a safe workplace free of discrimination and harassment and establishes a disciplinary procedure to manage and remediate issues.
Bullying in the workplace	Promotes a safe workplace free of bullying and intimidation.
Procedure for resolving employee workplace complaints issues	Establishes the procedure for resolving employee workplace issues. We encourage direct communication to resolve problems in the first instance, and dispute resolution processes where informal communication is not possible or practical.

All team members are introduced to our policy-suite via our human resources platform, through which new policies and any relevant training can be administered and records maintained.

New employees are introduced to these policies through our induction and on-boarding process, and are required to acknowledge their acceptance of them during this process.

4. Monitoring and Reporting

Engineers Australia is committed to transparently measuring the maturity and effectiveness of our own modern slavery risk management activities. We want to ensure continuous improvement aligned with the expectations of the Act. Outlined below is our approach to tracking progress and our roadmap for enhancing accountability in future reporting periods.

Future metrics for monitoring maturity

To assess the progress of our modern slavery risk management program, we will track the following key performance indicators (KPIs):

Supplier audits: we will display the number of audits conducted annually to evaluate compliance with our Supplier Code of Conduct and ethical standards.

Training completion rates: we will track the percentage of staff and suppliers completing our mandatory modern slavery awareness training.

Incident reports: we will display volume and nature of modern slavery-related concerns raised through grievance mechanisms.

Remediation actions: we will measure our timeliness and outcomes of corrective measures taken to address identified risks.

Supplier compliance rates: we will further monitor the proportion of suppliers adhering to contractual obligations on modern slavery due diligence.

Stakeholder engagement: we will strive to work with frequency and depth of consultations with NGOs, industry peers and affected groups to refine our risk strategies.

Impact assessments: we will re-examine the results of periodic assessment to evaluate how our actions reduce risks to our vulnerable workers.

Employee and supplier feedback: we will utilise insights from surveys and engagement sessions to improve program relevance and responsiveness.

These KPIs will enable us to monitor the operational maturity of our commitments and ensure alignment with statutory guidance.

Continuous improvement: transitioning to effectiveness metrics

While our proposed KPIs focus on tracking activity milestones, we recognise the need to transition towards measuring the impact of our actions. To facilitate this evolution, we will implement our strategy through a staged rollout, structured as follows:

Stage 1 (2025/2026)

Baseline establishment: finalise benchmarks for each KPI to enable year-on-year comparisons.

Governance integration: assign accountability for KPI reporting to senior management and our cross-functional Modern Slavery Committee, ensuring oversight and resource allocation.

Transparency Enhancements: disclose performance against KPIs in future statements to strengthen accountability.

Stage 2 (2026/2027)

Outcome-linked indicators: our goal is to develop metrics that correlate activities with tangible risk reductions. For example, percentage reduction in high-risk suppliers, improved worker access to grievance mechanisms.

Third-party collaboration: partner with auditors and NGOs to validate data and refine risk assessment methodologies.

Technology adoption: aim to implement digital tools to automate data collection and improve traceability across supply chains.

Stage 3 (2027/2028)

Impact evaluation: our commitment to align metrics with international standards (e.g., UN Guiding Principles, ISO 31000) will help to measure long-term human rights outcomes.

Sector-wide benchmarking: share insights with industry partners to drive collective progress against modern slavery risks.

Governance and review

Annual reviews: senior management will assess progress against KPIs and adjust strategies to address gaps or emerging risks.

Stakeholder feedback loops: endeavour to regularly engage suppliers, employees and the community to ensure our metrics remain relevant and actionable.

As we systematically advance from activity tracking to impact measurement, Engineers Australia aims to deliver meaningful, measurable progress in combating modern slavery. Future statements will reflect evolving metrics as we deepen our program's effectiveness.

5. Future commitments

Engineers Australia is committed to continuously enhancing our approach to addressing modern slavery risks, aligning with the principles outlined in the Act and the United Nations Principles on Business and Human Rights (UNGPs).

Our future commitments include:

Strengthening supplier engagement: we will intensify our collaboration with suppliers to enhance their understanding and management of modern slavery risks, ensuring they are equipped to identify and mitigate these risks effectively.

Updating contract clauses: we are developing and implementing standard contract clauses that clearly outline suppliers' obligations regarding modern slavery. This will ensure that all contractual agreements reflect our commitment to ethical practices.

Formalising a human rights policy: as a cornerstone of our risk management strategy, we are prioritising the adoption of a comprehensive human rights policy. This policy will provide a central framework for our ongoing commitment to human rights and modern slavery prevention, ensuring consistency across all our operations and documents.

Expanding training programs: we will expand our training initiatives to reach more staff, members and suppliers, fostering a culture of awareness and responsibility in addressing modern slavery risks.

Collaborating with stakeholders: we will engage in active collaboration with industry peers, government bodies and non-government organisations to share best practices and drive collective action against modern slavery. This partnership approach will help us stay informed about emerging risks and innovative solutions.

Upstream auditing: our future commitments include extending our modern slavery risk management efforts beyond our direct operations to encompass upstream partners. We will work collaboratively with these entities to promote transparency, strengthen due diligence and encourage alignment with our ethical standards to help mitigate modern slavery risks throughout our broader network.

6. Road Map

Engineers Australia is committed to progressing our counter-slavery response. Below we identify several important targets and our planned actions and activities to achieve them.

Many of these actions correspond to longer-term targets we will be progressing towards, while others are near-term priorities that have our current focus. Engineers Australia will be reporting on these actions and our measured progress against them in subsequent statements.

Action	Purpose	Measurement / KPI	Implementation Timeframe
Supply chain visibility	Creating a centralised supplier database that enables the collection of relevant data points.	Supplier database developed.	2025/2026
Updating policies	Updating and expanding Engineers Australia policy suite to include specific language and controls around modern slavery, beginning with the adoption of Supplier Code of Conduct (SCOC) and revision of complaints procedure, and a human rights policy (already underway).	Adoption of SCOC. Adoption of revised Complaints procedure. Adoption of human rights policy, including child labour.	2025/2026
Supply chain risk assessment	Establishing where our supply chain risk exposure is as a foundation for future actions and engagement.	All suppliers assessed for modern slavery risk, and risk exposure established.	2025/2026
Management oversight	Formalising management oversight of modern slavery issues by setting modern slavery as a regular agenda item in our biannual procurement meeting.	Modern slavery considered as an agenda item bi-annually.	2025/2026
Supplier engagement and assurance	Developing and deploying supplier assessment questionnaire (SAQ) to adjust risk and work towards greater supply chain visibility. Adopting additional assurance procedures for high-risk suppliers, such as inspections and third-party audits.	SAQ developed and deployed to all new suppliers. SAQ sent to high-risk existing suppliers based on outcomes of supply chain risk assessment. Additional assurance practices adopted, including auditing.	2025/2026
Collaboration	Exploring avenues for industry collaboration, including through joining the UNGC Modern Slavery Community of Practice. Signal commitment to sustainability by becoming a signatory to the UNGC.	Signatory to the UNGC or similar. Join UNGC Community of Practice or similar.	2025/2026
Supplier selection criteria	Undertake risk screening of potential suppliers for modern slavery risk prior to engaging suppliers.	Selection criteria developed and implemented.	2025/2026
Training	Conducting employee training on modern slavery issues, risks and mitigations.	Training developed and included in all induction processes; 100 per cent of new and current team members trained. Development of specialised training module for key team members (Procurement, People and Culture).	2025/2026
Updating contracts	Beginning review of contractual clauses for updating with specific modern slavery controls and language.	Adoption of counter-slavery contractual provisions for standard contracts. Inclusion of counter-slavery contractual provisions in all new contracts after suitable clause developed.	2025/2026

Conclusion

Engineers Australia is committed to playing a proactive role in the fight against modern slavery. We believe that by working together with our stakeholders, we can make a significant impact in eradicating modern slavery from our operations and supply chains.

In accordance with the requirements of the Modern Slavery Act 2018, we confirm that The Institution of Engineers Australia (ABN 63 020 415 510), Engineering Education Australia Pty Ltd (ABN 45 008 663 349) and EngInsure Pty Limited (ABN 82 610 649 851) does not have any wholly owned subsidiaries or entities it controls. Therefore, no consultation with associated entities is relevant or applicable to our modern slavery risk management processes.

We remain dedicated to transparency and collaboration, engaging with industry peers, government bodies and non-government organisations to share best practices and drive collective action against modern slavery. Our commitment to ethical practices and human rights will continue to guide our efforts in this critical area.

Principal Governing Body Approval

This Modern Slavery Statement has been reviewed and approved by the Board of Directors of Engineers Australia, in its capacity as the principal governing body of the reporting entity, on the 10th of December 2025. This approval confirms the Board's endorsement of the statement for submission under the Modern Slavery Act 2018.

Signed for and on behalf of the principal governing body:



Dr Raj Aseervatham

Board Chair and National President, Engineers Australia