



Modern Slavery Statement

2024 Financial Year





Introduction

Deloitte acknowledges the Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the lands on which we work and live. We pay our respects to their cultures, Elders past and present, and honour their continuing connection to land, waters and community.

This statement supports our commitment to comply with both the spirit and letter of the Modern Slavery Act 2018 (Cth) (the 'Act').

Our Modern Slavery Statement is a joint statement made by Deloitte Touche Tohmatsu on behalf of Deloitte Touche Tohmatsu, Deloitte Services Pty Ltd, Deloitte Consulting Pty Ltd, Deloitte Risk Advisory Pty Ltd, Deloitte Financial Advisory Pty Ltd, Deloitte Private Pty Ltd and Deloitte Tax Services Pty Ltd, which are all reporting entities, pursuant to section 13 of the Act for the financial year ending 31 May 2024.



CEO and Chair Message

We recognise we have an important role to play in respecting and advancing human rights. A key part of this is the need to address modern slavery in Australia, as well as globally. We're listening as well as working hard with businesses, communities, and governments to do this.

We continue to monitor and improve our understanding of modern slavery risk in our business and supply chains. We are honest and open about the risks we see and the ways in which we are addressing them.

We're committed to refining and strengthening our processes and actions to ensure we always act with integrity, independence, and transparency.

In the past 12 months, the Modern Slavery Working Group has progress on our journey to:

- Better manage our modern slavery risk
- Improve our supplier due diligence processes
- Strengthen our code of conduct
- Enhance our modern slavery grievance and remediation processes
- Further prioritise training for our people to help them identify modern slavery in our supply chains.

We're pleased with what we have achieved over the past four years. We remain committed to continuing to raise awareness with our people and our suppliers so we can better work together in the quest to address modern slavery.



Adam Powick
CEO, Deloitte Australia



John Greig
Chairman, Deloitte Australia

Approved by the Board on 29 October 2024

In this year's statement we will share:

- How our firm is structured
- The steps we are taking to ensure slavery does not take place in our business
- The controls we have implemented to ensure slavery does not take place in our operations and supply chain
- The action we have taken in this, and previous years
- Our future plans.

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Recognising the problem of modern slavery

Modern slavery, in all its forms, is a serious crime against the most vulnerable people in our communities and we recognise our part in the collective responsibility society has to address this insidious misconduct.

The *Modern Slavery Act 2018* (the 'Act') encourages large organisations to exercise their corporate responsibility and examine any potentially harmful business practices in their operations and those of their suppliers. Deloitte Australia's response to the Act focuses on the risk of violating fundamental human rights of vulnerable people through acts of modern slavery, as outlined in this statement.

- Modern slavery is an umbrella term for exploitative practices against persons¹. These practices include but are not limited to:²
- Human trafficking or trafficking in persons: the physical movement of people either domestically or internationally, through coercion, threat or deception for the purpose of exploitation.
- Slavery: physical or financial control over an individual by another. Includes slavery-like practices such as forced labour, forced marriage, servitude, debt bondage and/or deceptive recruiting for labour or services.

The worst forms of child labour: the procurement or offering of a child for the purpose of slavery-like practices or illicit activities.³ Deloitte Australia recognises the potential for cyber-based child sexual exploitation in this form of modern slavery.⁴

We understand that the protection of human rights and prevention of modern slavery practices is an ongoing process. We are committed to improving our due diligence and procurement processes through stakeholder engagement, internal resourcing and continuous review of existing controls. Our response is informed by domestic law, international guidance, and collaboration with the Australian anti-slavery community. We acknowledge that while we have found no evidence to date of a slavery threat within our practice, the potential for modern slavery does exist.



¹ Modern Slavery Act and Criminal Code

² National Action Plan to Combat Modern Slavery

³ Business & Human Rights Navigator (Worst Forms of Child Labour Convention No. 182)

⁴ Report of the statutory review of the Modern Slavery Act 2018 (Cth) The first three years

Our people, culture, and operations

Structure and reporting entities

In this statement, Deloitte Australia refers to the Australian partnership of Deloitte Touche Tohmatsu and its operational and functional entities in Australia and Papua New Guinea (PNG). We are headquartered at 50 Bridge St, Sydney, NSW. Deloitte Australia also has offices in all capital cities and a regional office in PNG.

We provide a range of professional services to clients in Australia and around the world, such as audit and assurance, tax and legal, strategy, risk and transaction advisory, and technology and transformation advisory services.

We have designed a modern slavery framework that is applied across all Deloitte Australia entities to promote a unified and consistent approach to the management of modern slavery risks across all our business operations. This complements Deloitte Australia's centrally managed procurement and quality & risk framework across our operations. Accordingly, this joint Modern Slavery Statement is also provided on behalf of Deloitte Services Pty Ltd (ACN 087 279 678), Deloitte Consulting Pty Ltd (ACN 611 750 648), Deloitte Risk Advisory Pty Ltd (ACN 611 748 184), Deloitte Financial Advisory Pty Ltd (ACN 611 749 841), Deloitte Private Pty Ltd and Deloitte Tax Services Pty Ltd (ACN 092 223 240), which are also reporting entities under the *Modern Slavery Act 2018*.

Deloitte Australia administers its internal functions such as employment of staff, procurement of goods and services, and its financial arrangements through several functional entities, including Deloitte Services Pty Ltd, D-Carbon Forests Pty Limited, and Deloitte Touche Tohmatsu Ltd (1-9313) (PNG). Generally, Deloitte's services are provided by the partnership and the following entities:

- Deloitte (Australia) Pty Ltd
- Deloitte Access Economics Pty Ltd
- Deloitte Actuaries and Consultants Limited
- Deloitte Consulting Pty Ltd
- Deloitte Corporate Finance Pty Ltd
- Deloitte DPA Pty Ltd
- Deloitte Economics (Australia) Limited NZ
- Deloitte Emissions Solutions Pty Ltd
- Deloitte Financial Advisory Pty Ltd
- Deloitte Legal Pty Ltd
- Deloitte Migration Services Pty Ltd

- Deloitte Motor Industry Services Pty Ltd
- Deloitte PDS Pty Ltd
- Deloitte Private Pty Ltd
- Deloitte Real Estate Pty Ltd
- Deloitte Risk Advisory Pty Ltd
- Deloitte Tax Services Pty Ltd
- Deloitte Touche Tohmatsu Partnership (PNG).

Deloitte Australia is also a member of Deloitte Asia Pacific Limited, a UK company limited by guarantee, which in turn is a member firm of Deloitte Touche Tohmatsu Limited ('DTTL'), a UK company limited by guarantee. Deloitte Australia is also a member of the Deloitte organisation. This comprises one or more of DTTL, its global network of member firms and their related entities. DTTL (also referred to as 'Deloitte Global') and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties.

This statement is made by Deloitte Australia in its own capacity and does not extend to other members of the Deloitte organisation.

Given the differences between our relationship with other entities in the Deloitte network and our relationships with third party external suppliers, we have excluded Deloitte member firms from the definition of suppliers for the rest of this statement. Our focus for the purpose of this statement will therefore be on our core business and third-party external suppliers.

Our people

Deloitte Australia has a diverse workforce of more than 13,000 people working together to serve our clients. Our recruitment processes, be it direct hiring, strategic sourcing, or collaboration with contracting agencies, are designed to maintain transparency and fairness.

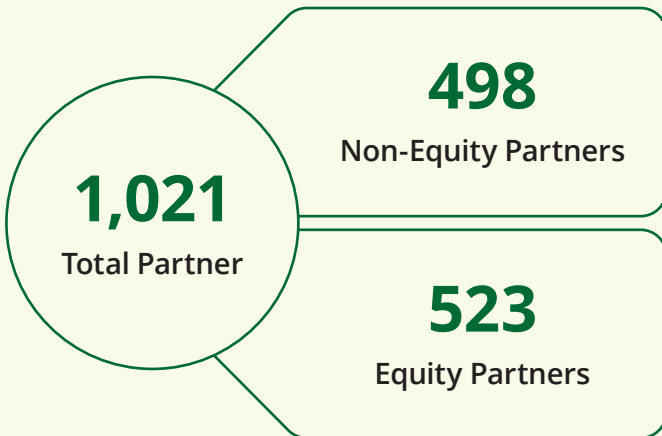
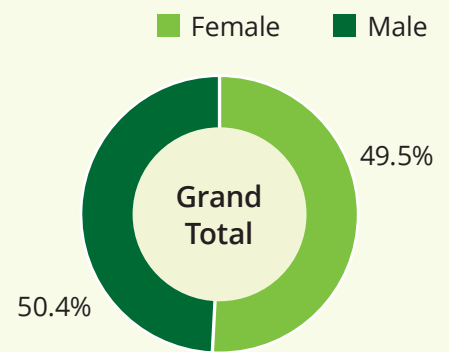
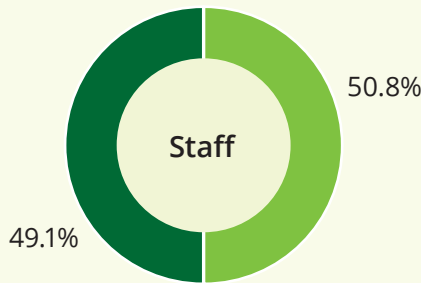
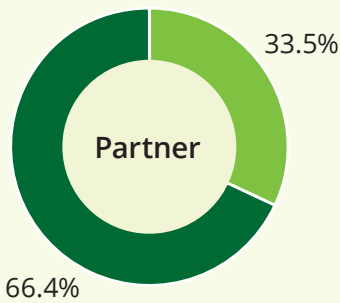
13,077

Total workforce
(As of May 2024)

Workforce by gender (May 2024)



*0.1% of our overall workforce is other/undisclosed



12,056
Total Employees



1,151
Total Grads

44.1%

Diverse Cultural Background¹



18.7%

Of Partners

46.7%

Of Workforce Excluding Partners

¹Diverse Cultural Background (DCB) refers to self-disclosed cultural affiliation with Asian, Pacific Islander, New Zealander/Maori, African, Latin American and Middle Eastern cultures. Data represents cultural rather than racial identity.

For our direct employee workforce, modern slavery risk is considered low as Australia is the primary country of employment and the professional services industry typically consists of higher skilled and educated individuals whose duties are the provision of services in office environments.

Deloitte Australia's functional and service entities in PNG operate through a local regional office (Deloitte PNG). We also have auxiliary team members in India, Malaysia and the Philippines who support onshore teams with client deliverables, compliance and internal support functions. These nations all have a higher risk rating in the Global Slavery Index than Australia and may present more risk than Australian-based teams. As part of the Deloitte member firm network, these teams have the same shared values, support processes for addressing unethical conduct, and policies that underpin our culture in Australia. They also perform work that requires higher skilled and educated individuals whose duties are for the provision of services in office environments.

As part of our risk management approach, we have implemented robust processes to ensure that our employees are remunerated fairly. All our employees are paid in accordance with the applicable laws and award rates. We have established processes to identify where employees may be covered by an existing award or other lawful sources of employee entitlements, with the objective of ensuring that employees are remunerated to at least that level.

Our culture

Our behaviour and actions are led by our Global Shared Values, which represent a key cornerstone of our commitment to being a responsible business. Our Global Shared Values underline our expectations that anyone working for, or on behalf, of Deloitte must:

- Lead the way
- Serve with integrity
- Take care of each other
- Collaborate for measurable impact
- Foster inclusion.

As part of our commitment to our culture, in FY24 we launched our Aussie Signals, which provide a clear statement of our values for people, our clients, and to each other. These five core values sit at the heart of our Deloitte Australia culture, and were formed in consultation with hundreds of our people across the firm. The five Aussie Signals are:

- Be you
- Empower and trust
- Talk straight
- Have fun and celebrate
- Dare to be different.

We are continuously embedding our Aussie Signals into our day-to-day moments, stories, and practices, including integrating the Signals within our talent systems and processes such as our recognition platform, performance framework, and recruitment and onboarding.

We encourage our employees to speak up if they observe inappropriate business conduct or unethical behaviour, and we have a non-retaliation policy in place. The Deloitte Speak Up service is available online or by telephone and allows people to remain anonymous if they choose to do so. There were no matters relating to modern slavery raised in FY24.

Deloitte's Human Rights Statement is based on the values and principles stated in the International Bill of Human Rights and is further guided by the United Nations Guiding Principles on Business and Human Rights (UNGP), and the Organisation for

Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. As part of our commitment to reducing human rights concerns, Deloitte Touche Tohmatsu Limited, our global entity, is a founding signatory to the UN Global Compact and the World Economic Forum Partnering Against Corruption Initiative. Deloitte Australia is a member of the UN Global Compact Network Australia.

Our operations

Our operations are centred on providing exceptional service in helping clients across a broad range of industries and sectors solve their most complex problems using a combination of full- and part-time partners, employees, independent contractors and subcontractors. From time to time, we engage the services of other members of our organisation to supplement our services. We also work collaboratively with select third parties across a range of different industries, such as software and other technologies.

No instances of modern slavery have been found or reported within our operations in FY24.

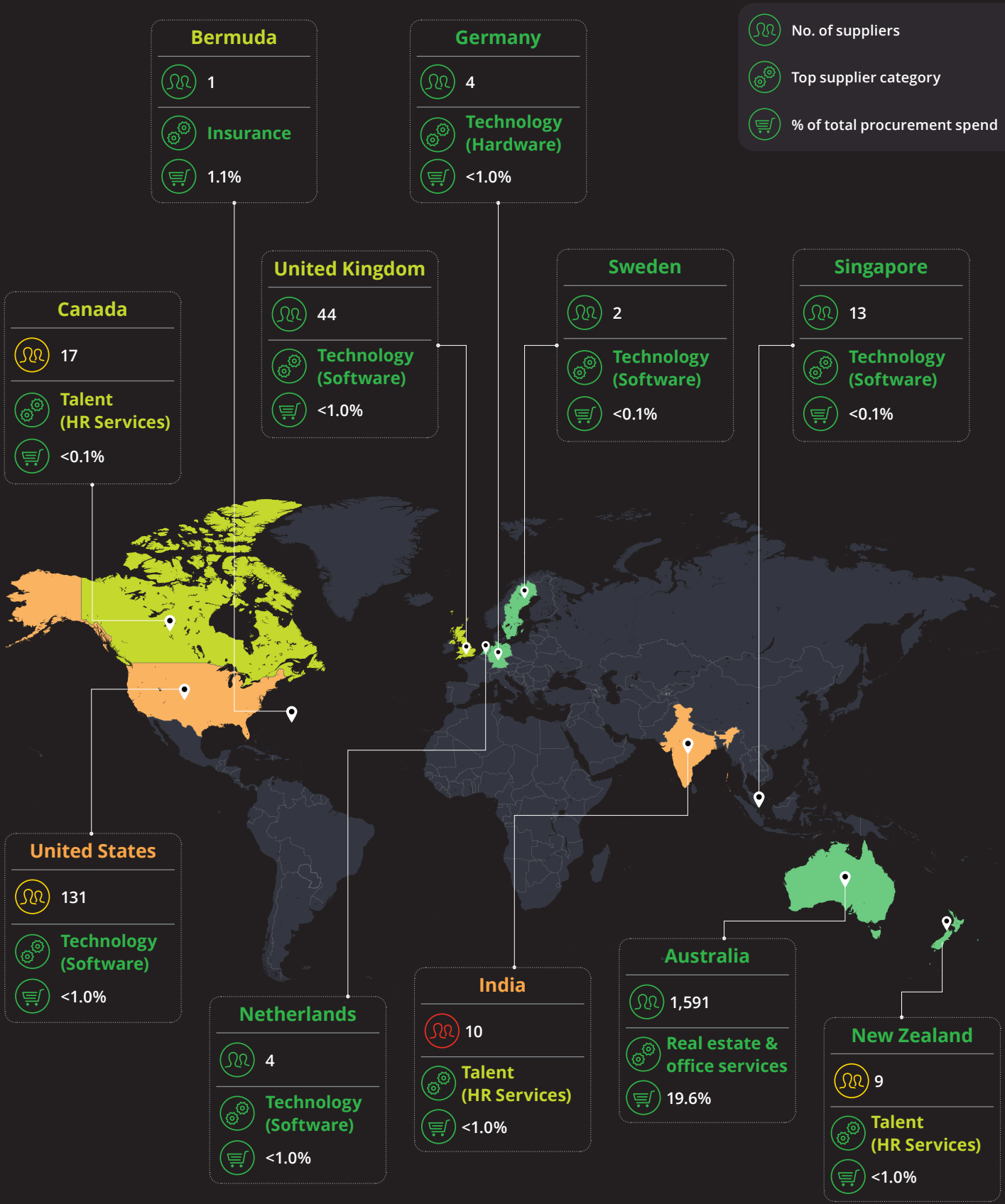
Our supply chain

In Australia, our procurement team oversees circa \$610M in annual supplier spend. For FY24, three key categories made up 70% of the total spend: real estate, business services, and technology. Our supply chains are expansive and extend beyond the supplier with whom we have the direct relationship.

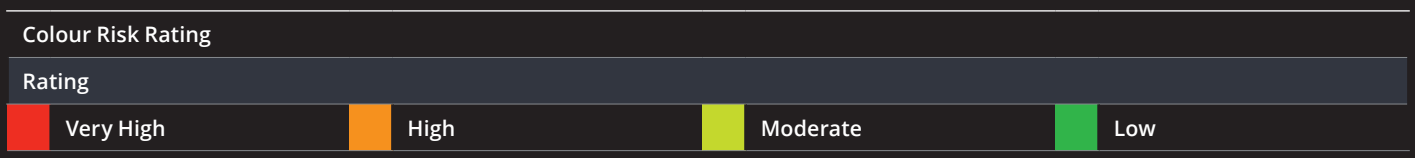
We may also procure goods or services from a supplier for resale to clients in connection with the delivery of our professional services. These arrangements with suppliers are assessed as part of Deloitte's supplier due diligence process to identify modern slavery and other risk factors.

Whilst we review our risk assessment regularly, our supply chains do not significantly change from year to year and as a result our risk profile has remained consistent over time. We would expect this to continue going forward and would only be likely to change if there was a major change in our operating model.

No instances of modern slavery have been found or reported within our supply chain in FY24.



Note: The majority of Deloitte technology spend is on software. Research indicates that technology firms in this category have low operational modern slavery risks, as individuals tend to be highly skilled and software development is dependent on knowledge sharing. However, we acknowledge that technological hardware does have an inherently higher risk of modern slavery in its supply chain. Our Technology spend in Germany was predominantly on software, with a small amount of hardware spend.



Supplier risk assessment methodology

To identify modern slavery risks, we consider the following increased risk factors or indicators:

Geography

- Weak or no enforcement of laws prohibiting forced labour
- Weak or inconsistent labour inspection framework
- Jurisdictions with a history of:
 - Recruiting compulsory labour
 - Public corruption.

Industry practices

- Sectors with intense competition between suppliers, causing pressure on time and costs
- Informal sectors, unregulated with poor visibility over lower-tier suppliers
- Sectors with decentralised operations
- Sectors with widespread use of third-party recruiters and subcontractors.

Labour levels

- Sourcing from a country with a high level of unemployment and poverty where the labour force may be more vulnerable to exploitative practices
- Migrant labour represents a large part of the workforce
- Low-skilled work and low minimum wage.

Our Risk Assessment Tool assesses country risks and industry risks, as well as red flags for companies and product/location combinations that are known to be high risk. We assess country risk using the following indexes:

- Global Slavery Index
- Fragile States Index
- Freedom in the World report
- Corruption Perceptions Index
- International Trade Union Confederation (ITUC) Global Rights Index
- Trafficking in Persons Report.

Industry risk assessment is based on in-depth research of modern slavery literature. We use 13 indicators of workplace behaviours and characteristics that are known to increase the risk of modern slavery in the workplace. We use these indicators to assess the potential modern slavery risk of 72 industries and sub-industries.

We also evaluate risk using data from the U.S. Department of Labor’s List of Goods Produced by Child Labor or Forced Labor, the ITUC Global Rights Index of companies violating workers’ rights, and the World Bank Group List of Fragile and Conflict-affected Situations to identify suppliers who may pose immediate risks of modern slavery.

Risk assessment findings

Based on spend, Deloitte’s primary supplier industry sector is Real Estate and Office Services.

Deloitte’s primary supplier industry sectors	The modern slavery risk associated with those industry sectors
<p>Real Estate and Office Services representing 29% of our supplier spend</p> <p>Sub-industries include:</p> <ul style="list-style-type: none"> • Property • Design • Construction • Facility operations and maintenance • Food and beverage • Office supplies and furniture. 	<p>Sub-category industry risks identified in this supply sector:</p> <ul style="list-style-type: none"> • Construction • Facility operations and maintenance • Food and beverage • Office supplies and furniture. <p>Risks arise due to:</p> <ul style="list-style-type: none"> • High demand for low-skilled labour and vulnerability of workers on temporary visas. • Complex Tier 2 supply chains, often operating out of high-risk jurisdictions. The use of raw materials in constructions, which is often sourced from high-risk jurisdictions.

Based on industry and country risk there are five red flags based on countries where Deloitte currently sources from, including Israel, Belarus, United Arab Emirates (UAE), Papua New Guinea and Timor-Leste. These countries were flagged based on the World Bank List of Fragile and Conflict-affected Situations (Timor-Leste and PNG) and a list of countries currently operating under the Kafala System (UAE). Israel and Belarus were flagged manually, based on active global conflicts that are not recognised in the aforementioned list.

There was a 'very high' risk flagged by the addition of a technology hardware supplier from Hong Kong. The industry category has a 'very high' modern slavery risk level, and the country risk is assessed as 'high'.

There were 39 'high' risks flagged. The high-risk categories were technology hardware, furniture, and facilities maintenance. The high-risk countries were Belarus, India, Malaysia, Thailand, and Vietnam.

These risk indicators assist us in developing a focused annual action plan on areas of higher risk, including more targeted individual supplier risk assessments.

Deloitte continues to monitor these risks.

No instances of modern slavery have been found or reported within our supply chain in FY24.

Our operational governance and policies

In 2019, Deloitte Australia established a Modern Slavery Working Group, which meets regularly throughout the year to progress our anti-modern slavery program. The working group is accountable to our Chief Risk Officer, a member of our executive responsible for the firm's risk and reputation. The working group includes:

- The Ethics & Conduct Leader, who chairs the working group and provides an annual update to the Board's Ethics & Risk Committee
- Human rights subject matter experts from our Audit & Assurance team offering relevant insights on global and local best practice
- Office of General Counsel representatives to review contractual engagements for the firm
- Sustainable sourcing specialists from our Global Procurement team who support human rights and embed sustainable considerations into our procurement operations across the Asia-Pacific portfolio
- Responsible Business team representatives.

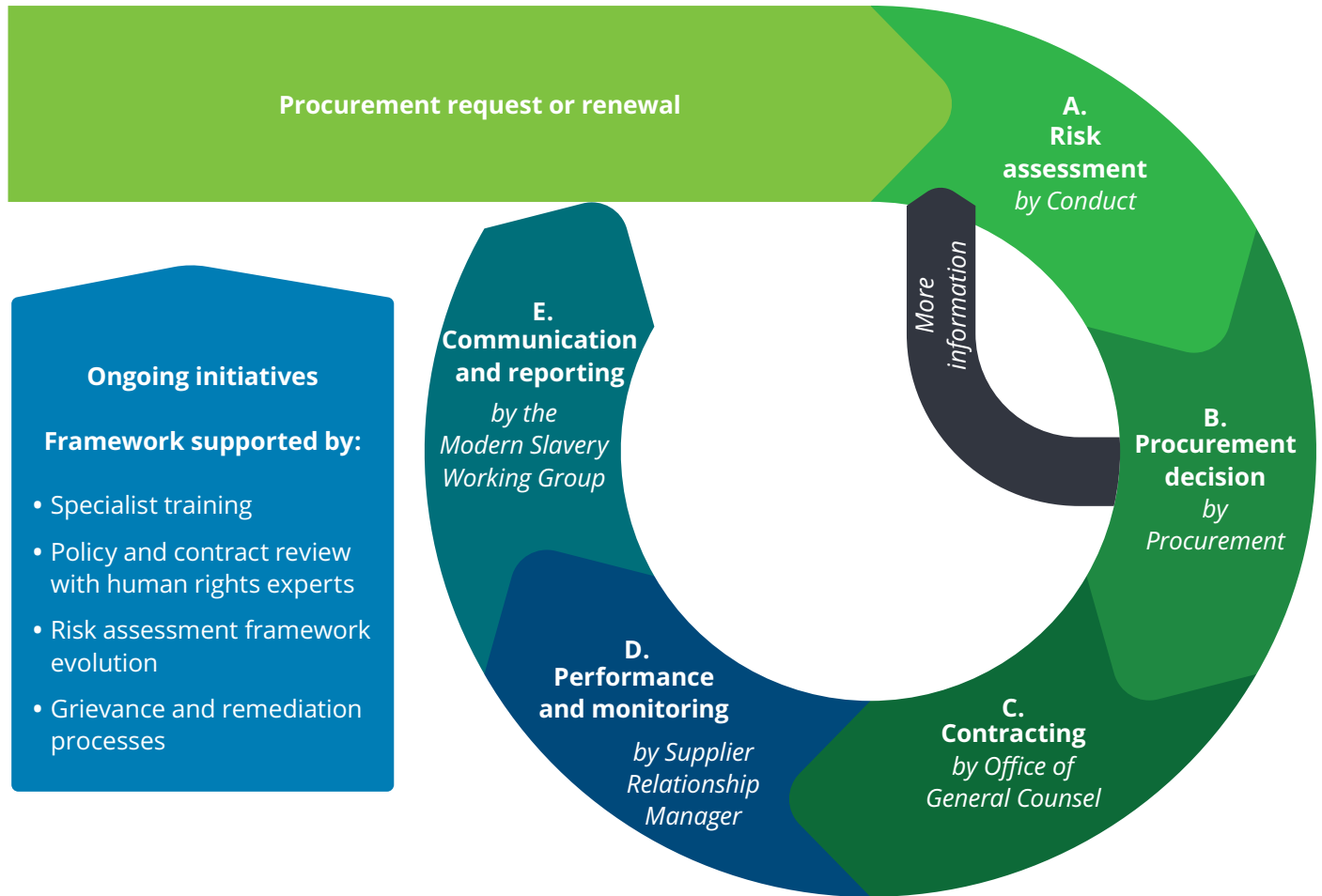
We have policies, processes and controls in place to guard against the risks of modern slavery and other forms of exploitation within our operations and workforce—whether located in Australia or overseas. The following policies and procedures are relevant to our approach to modern slavery:



Policy	Overview and relevance	Implementation
Deloitte Global Human Rights Statement	Our Human Rights Statement is based on the values and principles stated in the International Bill of Human Rights and is further guided by the United Nations Guiding Principles on Business and Human Rights (UNGP), and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.	Each of these human rights is accompanied by its dedicated policy or initiative that enables us to embed respect for human rights in our organisation - such as ethics; inclusion; WorldClimate; WorldClass; anti-corruption, anti-harassment, and privacy policies and programs; and ethical technology guiding principles. Each is overseen by a Deloitte Global leader responsible for its strategy and implementation.
Australian Principles of Business Conduct	Our Code sets out our values, ethical principles and expected conduct in undertaking our business operations including responsible procurement processes and respect for fundamental human rights.	Our Code is a key module in our mandatory onboarding process for all our employees and contractors and failure to adhere to its principles may result in disciplinary action.
Supplier Code of Conduct	The Supplier Code of Conduct expressly commits to alleviating risk of modern slavery practices and human rights violations within Deloitte's supply chains, based on the International Labour Organisation (ILO) Conventions and relevant United Nations Conventions.	All suppliers are required to comply with the Supplier Code of Conduct.
Deloitte Speak Up, Whistleblower and non-retaliation policies	The Whistleblower Policy is an important element in detecting and acting on corrupt, illegal or other undesirable conduct and is supported by Deloitte Speak Up and our non-retaliation policy. We strongly encourage individuals to speak up if they suspect or witness matters that concern them.	<p>The Whistleblower Policy is a key module in our mandatory onboarding process for all our employees and contractors.</p> <p>It describes the protections available to whistleblowers, what matters are reportable, how they can report concerns without fear of detriment, and how Deloitte will support and protect them.</p> <p>Deloitte Speak Up is a confidential hotline run by an independent third-party provider and enables Deloitte partners, employees, contractors, suppliers and clients to report any concerns.</p> <p>All reports are investigated.</p>
Deloitte CoRe Procurement policies & procedures	Our Procurement hub on our intranet provides guidance and toolkits to our teams for engaging with proposed suppliers.	Our Procurement policies and procedures help our people to understand potential risk associated with our supply chains.

Supplier risk management framework

Our risk management framework is described below.



Each of (A) to (E) are described further on the next pages.

A Risk assessment

The risk assessment process covers:

Frequency and nature of risk assessment

- A centralised team completes a modern slavery risk assessment for all new suppliers, on contract renewal for existing suppliers, and at regular intervals (a one- or three-year basis) depending on the previous due diligence rating.
- The risk assessment calculates a risk score using the Global Slavery Index and the Social Hotspots Database (scored using the business's operating country and the goods/services category). Open-source reporting is also reviewed for reference to keywords relevant to modern slavery allegations.
- We may also undertake a desktop review of information published by the supplier (e.g. their modern slavery statement or publicly available policies) and ask the supplier to complete a questionnaire to better understand the supplier's modern slavery risk and risk management framework.

Escalation and outcomes

- If the assessment flags a risk, the matter is escalated to senior members of the Ethics & Conduct team in consultation with the area of Deloitte that is requesting or responsible for the supplier relationship and internal modern slavery risk subject matter experts.
- In higher risk situations (e.g. extremely high-risk locations, or failure to adequately respond to the survey or demonstrate knowledge of modern slavery risks), the Ethics & Conduct team will discuss with senior leadership the risks and proposed mitigations.
- We strive to build relationships with suppliers who demonstrate a commitment to responding to modern slavery risks including identifying and remediating risks and supporting those impacted by modern slavery. We are focused on influencing and, where possible, supporting suppliers to address these risks to achieve a better outcome for the victims of modern slavery.
- In cases where suppliers deny responsibility or fail to support those impacted by modern slavery directly linked to their operations, the relationship holder and senior leadership of Deloitte will determine whether it is appropriate to continue the relationship.

Embedding learnings

- As we learn more and strengthen our risk management framework, we are better able to identify potential modern slavery risks in our supply chain. This helps us to refine and strengthen our due diligence questions and process.



B. Procurement decision

Deloitte Procurement manages global and local procurement programs for major spend, which covers most of our Tier 1 suppliers. The team undertakes sourcing and selection, contract negotiation, and management of major external supplier relationships. Following the completion of risk assessment, Procurement is responsible for the final procurement decision and contract negotiation. In making its decision, Procurement considers risk assessment outcomes completed by the Ethics & Conduct team as well as other risk factors specific to the supplier.

C. Contracting

Deloitte Procurement draws up and negotiates supplier contracts, with relevant guidance from the Office of the General Counsel. Our standard procurement agreements contain a model set of modern slavery obligations that outline our expectations of all our suppliers. These terms help to hold suppliers accountable for maintaining ethical business practices, including implementing policies and procedures to identify and assess risks of modern slavery in their operations and supply chain and to mitigate any risk identified. They also ensure that we can obtain reasonable information from suppliers to help us assess compliance. If our risk assessment process identifies a supplier as presenting a greater modern slavery risk, we will ensure that the terms address that additional risk.

D. Performance and monitoring

Where a supplier is identified as having a higher modern slavery risk rating, the modern slavery risk assessment is repeated more frequently to ensure that the risk is monitored appropriately.

Where a modern slavery issue is identified in relation to a specific supplier, the relevant Procurement Category Manager will engage with the supplier to understand the circumstances and work with the supplier to mitigate the risk.

E. Communication and reporting

The Ethics & Conduct Leader, as chair of the Modern Slavery Working Group, reports at least annually to the Board's Ethics & Risk Committee on its activities and the preparation of the annual Modern Slavery Statement.

Grievance and remediation

Our Grievance and Remediation Standard Operating Procedure (SOP) is built on a foundation of transparency, accountability, and continuous improvement. We prioritise a collaborative approach with stakeholders, focusing on education and capacity building to empower our suppliers and partners to meet our modern slavery requirements. Our aim is to foster an environment where grievances are addressed promptly, and remediation efforts are effective and sustainable.

This procedure applies to all Deloitte staff and partners, suppliers, clients, delivery centres, and other stakeholders involved in reporting or addressing grievances related to modern slavery.

Grievance mechanisms

Deloitte provides multiple channels to ensure accessible grievance mechanisms for clients, suppliers, partners, employees, ex-employees, their relatives, or dependents. Grievances can be reported through the Whistleblower process, the Deloitte Speak Up service, or the Complaints Handling process. All grievances follow formal processes with an investigative team evaluating each case to inform necessary actions. The Ethics & Conduct Leader has oversight across all cases.

Remediation plan

Our remediation plan ensures that any reports of misconduct are taken seriously and carefully assessed for appropriate resolution. All investigations follow a fair process, are conducted efficiently, maintain confidentiality, and involve trained investigators and subject matter experts. Investigations are independent of the individuals concerned with the allegations.

Our remediation plan for addressing grievances related to modern slavery includes several key elements: prioritising the best interests of victims, consulting with relevant government agencies and NGOs, and engaging with suppliers to understand risks and actions taken. We will conduct independent audits, report criminal offences to the police when necessary, and work to rectify harm through corrective action plans. Revised contracts include dispute resolution and termination provisions. We will review and document complaints to resolve issues, continually improve our processes, and ensure protection against retaliation for the reporter.

Managing issues identified in our supply chain

If potential cases of modern slavery are identified in our supply chain, we will take decisive actions, including engaging with the supplier to address the risk and understand their response, using commercial and contractual leverage to enforce compliance and agree on corrective action plans, consulting relevant government agencies and NGOs, and reporting possible criminal offences to the police. We will document and review complaints to improve our processes and strengthen supplier expectations. Our response prioritises listening to, supporting, and acting in the best interests of modern slavery victims.

Supplier remediation

Addressing breaches of modern slavery requirements within the supply chain necessitates a strategic and collaborative approach to remediation with suppliers. Deloitte engages in open dialogue, offers targeted support, and implements robust monitoring mechanisms to uplift supplier performance, mitigate risks, and promote ethical practices. Our principles of supplier remediation include a collaborative approach, prioritising education and capacity building, fostering continuous improvement, maintaining transparency and accountability, and upholding respect for human rights. By adhering to these principles, we empower suppliers to effectively address breaches, protect vulnerable workers, and prevent future occurrences.

Compliance and monitoring

Compliance and monitoring are crucial elements of our SOP to ensure adherence to relevant laws and regulations and the overall effectiveness of the process. By prioritising compliance and robust monitoring, Deloitte upholds ethical standards, mitigates modern slavery risks, and ensures the integrity of its grievance and remediation process.

We ensure legal and regulatory compliance by regularly reviewing and updating the SOP to align with current laws and industry standards. Designated personnel are responsible for staying informed about legislative changes related to modern slavery. Internal policy adherence is reinforced through regular training sessions and awareness campaigns, ensuring all involved people understand and follow our policies.

Data protection and confidentiality are maintained with protocols to safeguard privacy and secure sensitive grievance-related data. Periodic audits and reviews, conducted by internal auditors, assess compliance with legal requirements and organisational policies.

Regular risk assessments identify potential vulnerabilities in the grievance and remediation process, leading to the development of mitigation strategies. Monitoring mechanisms track key performance indicators, and reporting protocols ensure transparency with senior management and stakeholders. Clear escalation procedures are defined for addressing non-compliance or significant grievances.

Finally, continuous improvement initiatives are informed by monitoring findings and compliance assessments, with regular SOP reviews to ensure ongoing optimisation and effectiveness of the grievance and remediation process. It involves ongoing assessment, learning, and adaptation to enhance the efficiency, transparency, and responsiveness of the process.

Our actions and progress

Last year, we engaged our human rights specialists to undertake a current state assessment of Deloitte's approach to managing modern slavery risk across its operations. We sought to understand the extent to which modern slavery controls have been implemented within our operations and how effectively we are working to identify and manage modern slavery risks. The assessment consisted of desktop research, review of key documents, and a series of interviews with relevant risk owners within Deloitte Australia. The outcomes of this assessment have informed our key activities going forward.

Spotlight on actions: Global Human Rights Policy

At Deloitte, we believe all people are born free and equal in dignity and rights. Our commitment to human rights is inherent in our Purpose, to make an impact that matters, and is underpinned by our Shared Values that set the expectations we have for our people. In 2023, we solidified our commitment to advancing human rights across our organisation by launching a Human Rights Statement. Human rights are universal, and through the commitments we set out in this statement, we acknowledge our responsibility across our organisation and beyond.

Our Human Rights Statement is based on the values and principles stated in the International Bill of Human Rights and is further guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs), and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

Our approach

We commit to advancing the following human rights within our organisation through:

- Employment and workers' rights
- Equality and non-discriminatory treatment
- Environmental sustainability
- Education and skills development
- Anti-corruption
- Privacy
- Trustworthy technology.

Each of these human rights is accompanied by its dedicated policy or initiative that enables us to embed respect for human rights in our organisation—such as ethics, inclusion, WorldClimate, WorldClass, anti-corruption, anti-harassment, privacy policies and programs, and ethical technology guiding principles. Each is overseen by a Deloitte Global leader responsible for its strategy and implementation.

Deloitte's Global Principles of Business Conduct ("Global Code") articulates the standards that Deloitte people should uphold and reflects our Shared Values and core belief that ethics and integrity are non-negotiable. These principles are incorporated into our

mandatory training programs, which help empower our people at all levels with the knowledge and skills necessary to uphold our Global Code. Through these and other approaches, we actively work to prevent and mitigate human rights impacts.

We expect organisations with which we have a business relationship to uphold our commitment to human rights and responsible business practices. Deloitte's Supplier Code of Conduct defines our expectations of suppliers, including treating workers with dignity and respect and not subjecting them to demeaning conditions. Deloitte's Commitment to Responsible Business Practices articulates our beliefs and commitments to responsible business decision-making, and outlines our approach to our business relationships, including with whom we work and the work we do.

In jurisdictions where national law and our human rights commitments conflict, we will comply with national law and use our influence to respect and promote international human rights.

To report on our human rights initiatives, we rely on key performance indicators (KPIs) that are included in the Governance section of the [2023 Deloitte Global Impact Report](#). This integrated approach ensures that the metrics used to measure progress in other areas, such as environmental, social, and governance, are also used to measure Deloitte's advancement in human rights. The KPIs throughout the report provide an evaluation of our efforts and affirm the interconnectedness of human rights with our organisation's strategy.

The Deloitte Global Chief Ethics Officer and Deloitte Global Chief People and Purpose Officer oversee our Human Rights Statement, and the statement is supported by leaders within Deloitte firms. Both of these Deloitte Global leaders report annually to the Deloitte Global Board on their respective areas of responsibility. Externally, we communicate our human rights impacts and progress annually in this Global Impact Report and our United Nations Global Compact Communication on Progress.

Spotlight on actions: Strengthening of the Deloitte Global and Deloitte Australia Supplier Code of Conduct

In FY24, Deloitte Global undertook a consultation process with multiple Deloitte Member Firms, spanning multiple geographies, to update the Supplier Code of Conduct. All suppliers must agree to and sign the Supplier Code of Conduct, prior to engagement with Deloitte. The Supplier Code of Conduct sets out the standards that our suppliers must satisfy, including complying with all applicable laws, human rights and fair labour standards. This document includes information about how suppliers can report breaches of the supplier standards, or unethical conduct through the confidential and anonymous Deloitte Speak Up service. Suppliers who agree to these standards also provide permission for Deloitte to seek evidence/conduct audits to validate their compliance with these requirements.

Substantive changes made in this latest revision include:

- Explicitly including the terms 'slavery and practices akin to slavery'
- Not tolerating payment of unequal remuneration for work of equal value
- Expectations to eliminate the use of conflict minerals in products, services or supply chain
- Requirement for supplier security personnel to be adequately trained and prohibited from engaging in practices leading to torture, physical injury, inhumane or degrading treatment, or the obstruction of an individual's freedom of association.

Deloitte Australia has its own localised Supplier Code of Conduct, which makes further commitments to:

- Supplier diversity: Expectations that our suppliers will support First Nations businesses
- Gender equality: Our expectations for suppliers to promote gender equality and to have women in leadership, in influencing roles on bid teams, and in leadership development programs.

Spotlight on actions: Establish understanding of human rights applied to our commonly used Delivery Centres

Deloitte Australia has auxiliary team members in India, Malaysia and the Philippines ('Delivery Centres') who support onshore teams with client deliverables, compliance and internal support functions. Because these nations have a higher risk rating in the Global Slavery Index than Australia, we wanted to expand our understanding of how human rights are being upheld in these Delivery Centres.

For this exercise, the Modern Slavery Working Group consulted with the Australian-based team that manages Deloitte Australia's engagement of these Delivery Centres. Deloitte Australia can engage with Delivery Centre staff on a per-project basis, or as extended team members for business-as-usual internal operations.

Delivery Centre operations

Staff in these Delivery Centres are employed by other Deloitte member firms who are bound by the same Shared Values, standards of ethical conduct and fair pay as employees of Deloitte Australia. All staff and partners in all member firms subscribe to the Global Principles of Business Conduct. The other Deloitte member firms that manage these Delivery Centres include Deloitte United States, Deloitte South Asia, Deloitte South-East Asia, and Deloitte Global.

Delivery Centre supply chains

It is beyond our reasonable scope of control to directly influence how other member firms manage their own suppliers. However, all Deloitte member firms adhere to the same standards and processes of supplier due diligence as Deloitte Australia, through our global CoRE Procurement function.

The Deloitte Global Principles of Business Conduct contains unequivocal statements around maintaining a 'responsible supply chain' and not condoning any illegal or unethical behaviour by our suppliers, contractors or alliance partners. Suppliers undergo evaluation during both new contract negotiations and contract renewals. This evaluation encompasses all due diligence assessments, including a third-party risk assessment, and independence and anti-corruption assessments. The Supplier Code of Conduct, which outlines the requirement for compliance with all relevant laws and human rights, is shared with all suppliers regardless of expenditure, and requires agreement and signature prior to contract execution.

Spotlight on actions: Enhancing supplier due diligence processes

Throughout the reporting period, Deloitte has enhanced supplier due diligence in alignment with guidance provided by the -Attorney General's Department, to include:

- Transparency around supplier usage of third-party labour hire/recruitment agencies in their operations to provide more comprehensive visibility over our Tier 2 and 3 supply chains.
- Employment of seasonal, contract, or otherwise temporary workers to assess any potential vulnerabilities in our suppliers' infrastructure.
- Additional jurisdiction and industries added to our modern slavery risk matrix.

Spotlight on actions: Evolving our grievance and remediation processes

In the past year, Deloitte has undertaken significant efforts to enhance our Grievance and Remediation Standard Operating Procedure (SOP) as part of our ongoing commitment to combat modern slavery and uphold the highest standards of ethical conduct. The SOP for addressing modern slavery grievances and remediation was developed in consultation with our Ethics team, Office of General Counsel (OGC), and Procurement. This SOP is aligned with Deloitte's existing policies, including the Whistleblower Policy, Speak Up service, and Complaints Handling Policy, ensuring a cohesive approach to ethical practices and grievance management. This SOP provides a structured framework for effectively managing grievances related to modern slavery within Deloitte and ensuring prompt and appropriate remediation actions are taken to address any identified issues.

The purpose of this SOP is to ensure that appropriate grievance and remediation options are available to rights holders who may have experienced or witnessed modern slavery within Deloitte's supply chain or operations. This update is a crucial component of our strategy to ensure that all individuals affected by our operations and supply chains have access to effective grievance mechanisms and meaningful remediation.

FY20–FY23 progress

In FY23:

- Our human rights specialists assessed our approach to managing modern slavery risk across our operations. We sought to understand the extent to which our modern slavery controls have been implemented within our operations and how effectively they are working to identify and manage modern slavery risks. The assessment consisted of desktop research, review of key documents, and a series of interviews with relevant risk owners within Deloitte Australia.
- We began deep dive reviews into suppliers identified as being from high modern slavery risk industries. We identified Tier 1 and Tier 2 cleaning and property services suppliers, reflecting the higher inherent risks within these workforces and their supply chain. Each supplier was assessed against our modern slavery risk framework and a modern slavery questionnaire to seek more detailed information. Where necessary, we sought more detailed information from suppliers about their approaches to managing modern slavery risks, especially concerning specific groups of employees, and were satisfied with their responses.
- In conjunction with the deep dive into our cleaning and property services suppliers, we conducted a review of our lease agreements for our major premises across Australia to identify the extent to which existing contract terms support the management of modern slavery risks within our supply chain. We are working to incorporate terms whereby Deloitte and the landlord agree to work together with the Tier 2 suppliers to address any identified risks of modern slavery. We have taken steps to ensure that our standard modern slavery terms are incorporated in new lease agreements and renewals of existing leases, which reinforces our expectations with respect to the management of modern slavery risk in the landlords' operations and supply chains.
- Deloitte made a submission to the Australian Government review of the Modern Slavery Act 2018, which considered the operation of the Act in its first three years and measures to improve the operation of and compliance with the Act. In developing our submission, we consulted with clients to gain their perspective and attended round table consultations to share our insights. Our submission made several recommendations and can be found here: www.deloitte.com/au/en/services/risk-advisory/blogs/australias-modern-slavery-act.html.

In FY22:

- Our human rights experts conducted a second risk assessment of new Tier 1 suppliers onboarded after the FY20 assessment. We confirmed higher risk categories for future deep dives.
- We improved our screening process to flag modern slavery risk in our supply chain. We flagged a modern slavery risk in Tier 2 of our supply chain, due to the geographic location of the professional education supplier. We gathered detailed information from the supplier about key risk management practices, and consulted our human rights experts before approving use of the supplier.
- We continued to roll out mandatory training to all new and existing partners and employees, with 98% completions.

FY21:

- Our human rights experts developed two training modules: 'What is modern slavery' training and an interactive module to help people discern modern slavery risks in their daily jobs.
- We provided advanced training to our Ethics & Conduct and Procurement teams, who perform the risk assessments and have decision-making authority over major spend by the firm.

FY20:

- We formed a Modern Slavery Working Group with members of the operational teams who have ongoing responsibility for monitoring, assessing and actioning our Modern Slavery Framework.
- Our human rights experts conducted the first risk assessment of 944 Tier 1 suppliers, identifying higher risk categories and source countries.
- We reviewed, updated, and put into practice our *Supplier Code of Conduct and CoRe Procurement Supplier Standards Requirement* to reflect the risk of modern slavery.
- We updated our standard supplier contract templates to establish minimum contractual expectations for suppliers.

Measuring effectiveness

We are committed to doing business ethically and legally and we recognise the importance of measuring the effectiveness of our efforts.

We monitor the supplier due diligence assessments, modern slavery training completion rates, as well as any matters raised through our grievance channels as indicators of the effectiveness of our response to anti-modern slavery.

Framework focus

Maintaining internal awareness of modern slavery and reporting channels

- 92.95% of all partners and employees completed modern slavery training
- 82% of all procurement employees completed specialised modern slavery training in 2021. Due to personnel changes, only 23% of current procurement employees have completed this training. This will be prioritised in FY25.
- 91% of our people 'believe that they can report unethical conduct without fear of retaliation', as reported in our 2023 Ethics survey
- 85% of our people 'know where to go to report incidents of possible unethical conduct', as reported in our 2023 Ethics survey

Enhancing our risk management capability

- 1,111 suppliers were subject to routine anti-corruption due diligence (which includes modern slavery checks)
 - Our due diligence metrics were uplifted to enhance visibility over our Tier 2 and 3 suppliers.
-

Looking ahead

As a responsible and ethical business, we are committed to eradicating modern slavery from our operations and supply chains where we have a reasonable level of control. We have outlined a series of key actions for the next few years that will help to drive meaningful change.

Category	Action	FY25	FY26	FY27
Policy and governance	<ul style="list-style-type: none"> Continue to refine our approach to working with suppliers that have a low level of maturity around modern slavery practices. Continue regular spot checks across high- and medium-risk suppliers to ensure compliance with the supplier code of conduct. Further develop detailed metrics and KPIs to assess the effectiveness of actions taken to address modern slavery risk. 	X	X	X
Risk management	<ul style="list-style-type: none"> Refresh both general modern slavery training and tailored mandatory training for higher risk roles such as procurement. Implement a consistent framework for identifying and escalating modern slavery risks. 	X	X	
Supply chain management	<ul style="list-style-type: none"> Audit supplier contracts across high- and medium-risk suppliers to ensure modern slavery provisions are included. Strengthen supplier screening, retention & engagement processes, including the implementation of a deep dive supplier questionnaire when the supplier is flagged as higher risk. Improve documentation of supplier due diligence in a Standard Operating Procedure. Ensure modern slavery-specific due diligence questions are included in the implementation of a new risk management system that will be used for supplier and business relationship risk assessment. Develop and execute a consultation plan for operations outside Australia where we have direct control (Papua New Guinea office). The focus of this consultation will be on supplier due diligence and contracting processes, and identifying ways to mature the team's understanding and application of modern slavery risk assessments to local suppliers. Develop and execute a consultation plan for operations outside Australia where we do not have direct control (offshore Delivery Centres). The focus of this consultation is to raise awareness of modern slavery laws in Australia, and other jurisdictions with similar laws to us (e.g. United Kingdom and Germany). 	X	X	X
Monitoring, mitigation and remediation	<ul style="list-style-type: none"> Continue to mature the remediation process for identified instances of modern slavery. 	X	X	X

Appendix: Australian Modern Slavery Act mandatory criteria

We are committed to doing business ethically and legally and we recognise the importance of measuring the effectiveness of our efforts.

We monitor the supplier due diligence assessments, modern slavery training completion rates, as well as any matters raised through our grievance channels as indicators of the effectiveness of our response to anti-modern slavery.

Australian Modern Slavery Act mandatory criteria	FY24 Modern Slavery Statement
Identify the reporting entity	Structure and reporting entities
Describe the reporting entity's structure, operations and supply chains	Structure and reporting entities
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Our people Our operations Our supply chain
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Our operational governance and policies Supplier risk management framework Grievance and remediation Our actions and progress
Describe how the reporting entity assesses the effectiveness of these actions	Measuring effectiveness
Describe the process of consultation with any entities the reporting entity owns or controls	Structure and reporting entities
Any other relevant information	Recognising the problem of modern slavery Our culture Looking ahead

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