MÉDECINS SANS FRONTIÈRES AUSTRALIA LIMITED

ACN 068 758 654

2025 MODERN SLAVERY STATEMENT

Principal Governing Body Approval

This Statement covers the reporting period of 1 January – 31 December 2025. It was approved by the Board of Médecins Sans Frontières Australia Limited on 24 June 2026.

This Statement is signed by a duly authorised person pursuant to the Act's requirements.

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Signature

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Nikola Morton

President

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Date

24 June 2026

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Quick Reference Guide to Reporting Criteria in section 16 of the Modern Slavery Act 2018 (Cth) (the Act)

Mandatory Reporting Criteria under the Act - (sub-sections under s.16(1))	**Part of this Statement where criteria described**
(a), (b) and (f)	1
(c) and (d)	2
(e) and (g)	3

1. REPORTING ENTITY - STRUCTURE, OPERATIONS AND SUPPLY CHAINS

This is **Médecins Sans Frontières Australia Limited's** (referred to as 'MSFA', 'we' and 'our') Modern Slavery Statement for the 2025 calendar year.

MSFA continues to assess and mitigate possible areas of modern slavery risks within our operations and supply chains. **MSFA** is a public company limited by guarantee and operating as an independent charity. Our Executive Leadership, Board and relevant committee (Finance, Risk and Audit Committee) have reviewed and approved this Statement.

Médecins Sans Frontières is a global Movement of not-for-profit entities, of which **MSFA** has operated as the Australian Section since 1994. **Médecins Sans Frontières** provides independent humanitarian aid to people across the world who are experiencing crises such as conflict, epidemics, natural and man-made disasters or exclusion from health care.

This Movement operates in over 70 countries and includes MSF International which comprises of 7 'Operational Directorates', 24 'Sections', 19 'Branch Offices' and additional satellite organisations (Entities).

MSFA operations are based out of Sydney, New South Wales.

Médecins Sans Frontières New Zealand Charitable Trust

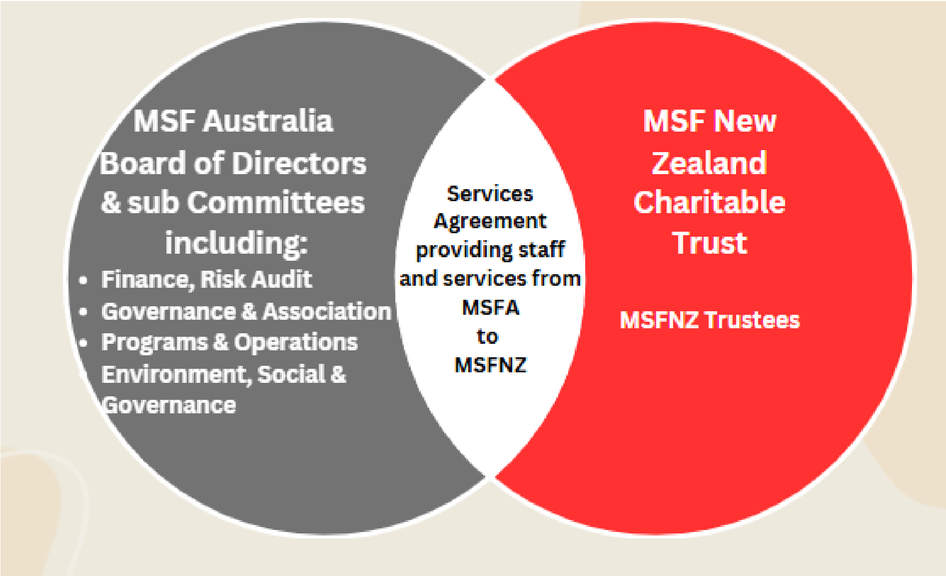
This Statement also covers Médecins Sans Frontières New Zealand Charitable Trust (**MSFNZ / the Trust**) (**Charity Number 53189**). Measures to identify, assess and address modern slavery risk, as detailed in this Statement, are also applicable to MSFNZ.

MSFNZ operations are based out of Auckland, New Zealand.

To facilitate this relationship, **MSFA** oversees and controls much of **MSFNZ**'s activities under a **Shared Services Agreement.** This includes a partially centralised procurement function, shared resources and risk mitigation of joint IT platforms and materials.

MSFA is governed by its board which is appointed through the **MSFA** members ('The Association'), which includes both MSF international staff (past and present) as well as domestic staff (both in MSFA and MSFNZ). The board's responsibilities include delegation of operations and decision making to the Executive team whilst retaining oversight. The diagram used below outlines this relationship[1]:

[1] The same explanatory diagram was included in last year's Statement. However, as this key corporate structure and relationship has not changed, it continues to be an applicable description in terms of the Act's mandatory criteria.



APAC

MSF APAC (Asia Pacific) is a formal Partnership between the institutional members of MSF in the region - Australia, Japan, Hong Kong, and The Republic of Korea. This Partnership is focused on developing new fundraising markets in the APAC region and supporting the equitable placement of a workforce in accordance with operational needs as well as providing support to operations in areas where a locally based approach is more efficient.

Core Operations

To fund the multiple humanitarian operations of the **MSF** Movement, **MSFA** relies on fundraising through the Australian and New Zealand public. Most raised funds are used for the medical humanitarian programs run and coordinated by **MSF Geneva** and **MSF Paris** operations teams.

MSFA also continues to be actively engaged in mobilising and supporting international mobile staff (IMS) for evolving operational roles. Comprehensive onboarding and training are a key part of this overall process, including specialist training for staff aligned with the program they are employed under, general medical training and supporting both international and Australian training courses.

MSF undertakes ongoing assessment of these programs and missions to ensure that effectiveness, efficiency and impact continue to be achieved.

MSFA and **MSFNZ** are also committed to advocacy that increases public and government awareness about the humanitarian crises in which the global Movement is engaged.

MSFA and **MSFNZ** continuously work with interdependent MSF Operational Directorates which involves the provision and distribution of grant funding and recruitment of **MSFA** staff. The grants finance independent medical and humanitarian programs, which are administered through these Operational Directorates.

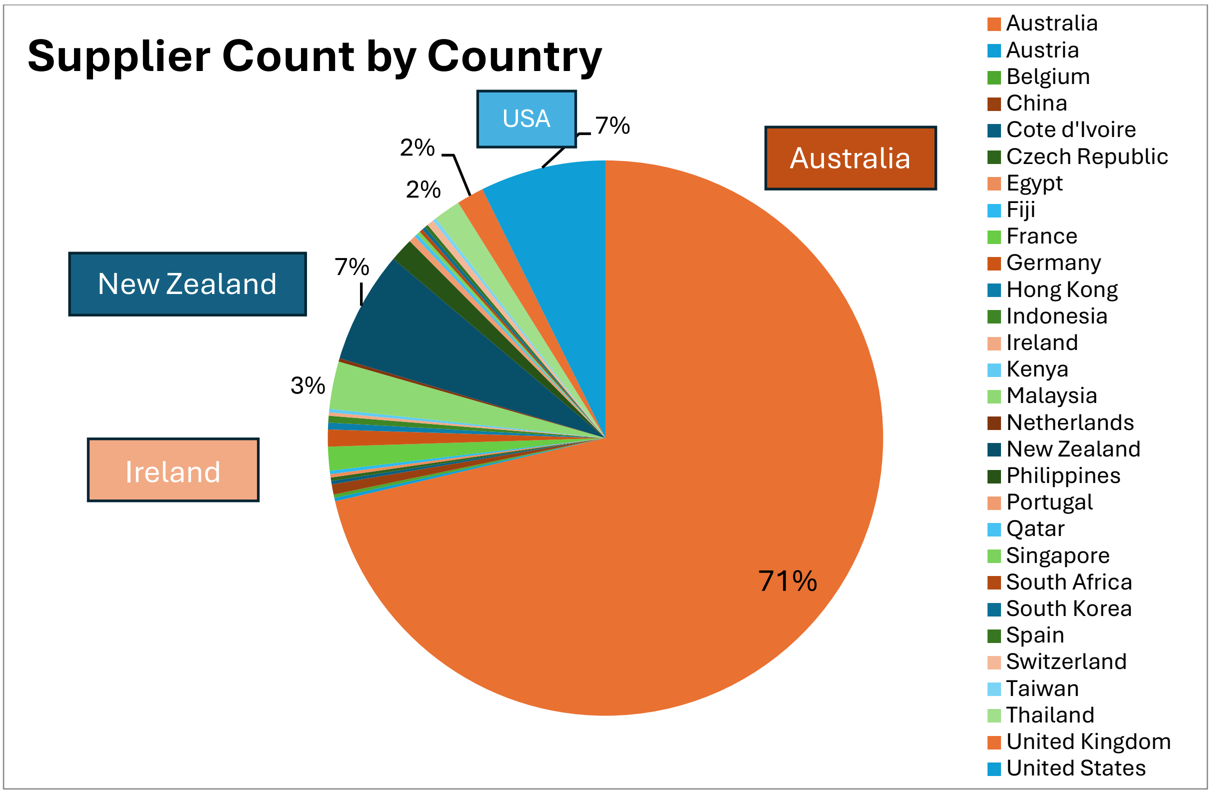
During 2025, **MSFA,** as an **APAC** partner, procured from suppliers within the Asia Pacific Region. In 2026 a new Branch Office Entity based in Malaysia has been registered which will reduce the number of suppliers contracted by **MSFA on behalf of APAC from 2027 onwards**.

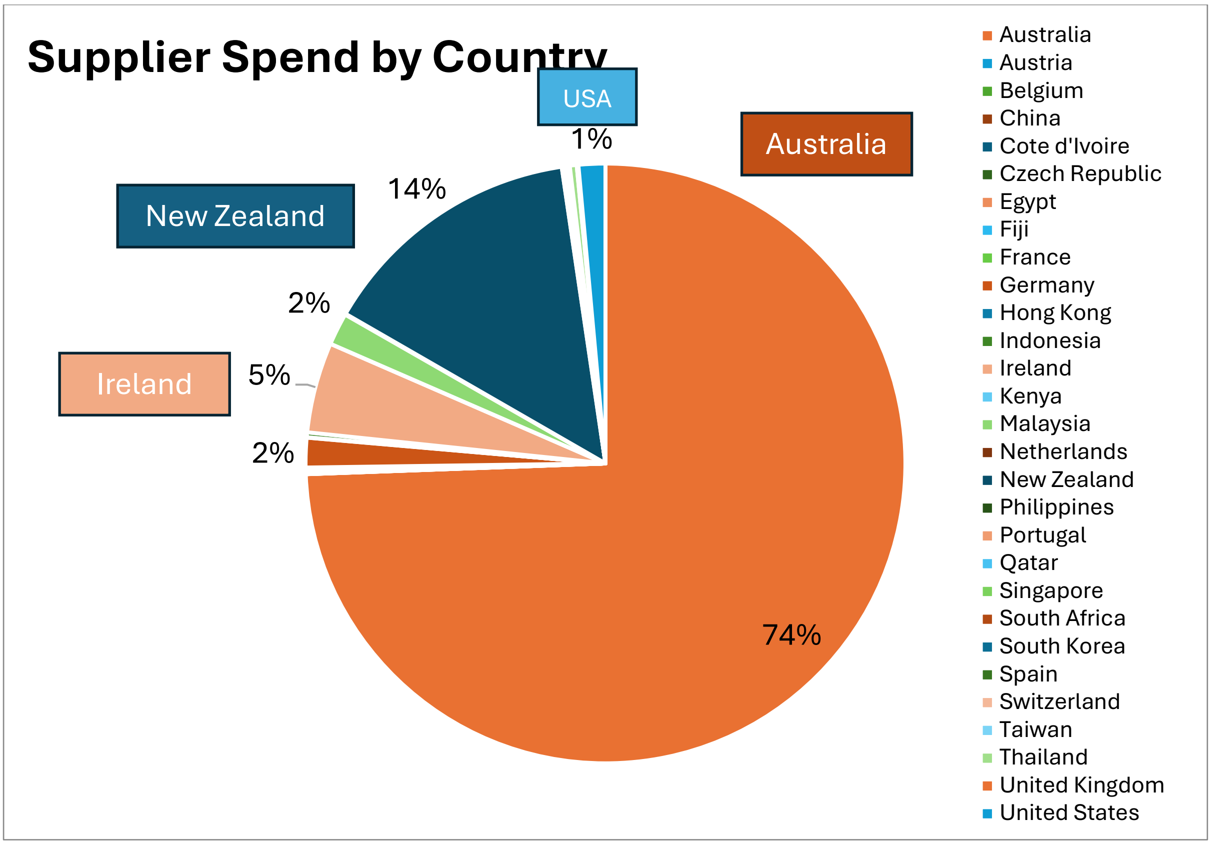
At the end of 2025, **MSFA** had a total of 134 employees working domestically, and through the year had 16 new recruits and 97 field placements, comprising our 'International Mobile Team'. Out of our office staff, 110 are full time, 21 are part time and 3 casual employees.

Supply Chains

MSFA & **MSFNZ** engaged with a combined total of 517 unique suppliers during the reporting period. This is a slight increase from last year (466 suppliers). This can be further broken down, with MSFA utilising 493 suppliers and MSFNZ utilising 24.

We engaged directly with 181 international suppliers (i.e. not Australian or New Zealand companies). The following charts show an overview of where our first-tier suppliers were based in 2025 (those suppliers paid directly by MSFA or MSFNZ). By number of suppliers 85% were based in Australia, New Zealand, Ireland or the USA whilst by value these countries covered 94% of spend. Identifying first-tier suppliers, or direct suppliers, is a foundational step to understanding where modern slavery risk may lie.





Supplier categories / industry sectors for our overall procurement continue, as with previous years to include the following which are noted as higher risk sectors within the Fair Supply methodology.

- **Business services** - which support our day-to-day Australian businesses operations. This encompasses a broad range of services such as accounting, legal advice, facilities cleaning services, waste management, marketing/ advertising, and consulting services.
- **Hotel and Restaurant Services** - hospitality services including the purchase of food and beverages from cafes and restaurants and the purchase of accommodation from hotels and other accommodation providers.
- **Textiles** - processed textile materials commonly used in branded apparel and staff uniforms - for example, with Face-to-Face fundraising. Cotton is a dominant high-risk input in this sector. Although we may purchase these textiles from Australian companies, the actual clothing items are commonly manufactured overseas, which significantly increases overall supply chain risk.
- **Retail Trade services** – purchase of goods and products from office consumables to other common day-to-day items not covered by the more specific product procurement categories.

Office Re-Location

A notable non-recurring procurement activity for **MSFA** during 2025 was our office relocation.

This included expenditure on a new office design and fit out and engaging with new suppliers through the landlord.

MSFA selected suppliers for the new office premises through a Request for Proposal Process, which included a formal supplier assessment process to manage potential risks, including modern slavery.

2. IDENTIFYING, ASSESSING and ADDRESSING MODERN SLAVERY RISKS

SUPPLY CHAINS

MSFA continues its long-term practice of comprehensive risk assessment of our complete supply chains. This is conducted through collaboration with our external consultants, **Fair Supply.**

This report was completed by the Procurement function within MSFA in partnership with Fair Supply. Areas of potentially (and relatively) elevated modern slavery risk exposure were identified and assessed using proprietary risk assessment and supply chain mapping technology which looks at both the industry and the country of supply with a resultant estimate of people in forced labour. When layered against the amount of spend by **MSFA** and **MSFNZ** would indicate where **MSFA** may be most exposed.

Each supplier within MSFA's spend for 2025 was assessed for modern slavery risk by combining MRIO models with data from the Global Slavery Index, ILO, and U.S. government sources. Fair Supply classifies modern slavery risk using a numerical score and a 5-point rating scale: Low, Moderate Low, Moderate, Moderate High, and High. These classifications are based on the distribution of forced labour risk across global industry and geography, enabling meaningful comparison and prioritisation of suppliers.

Overall MSFA's modern slavery exposure remains relatively low. Of all the Australia and NZ (and APAC) suppliers the risk categories are summarised as follows:

- 474 suppliers - Low or Moderate / Low risk
- 29 suppliers - Moderate
- 14 suppliers - Moderate high risk

Of the 14 suppliers which fell into moderate high risk, 11 of these related to suppliers purchased for the APAC partnership.

Supplier categories that we engaged this reporting period that fell into the Moderate High Risk category (either in their direct operations or, more commonly, within their own procurement chains) fall into two groups described below. *Total spend with suppliers in these moderate – high risk countries and sectors was less than $50k.*

Moderate High Risk - APAC related procurement (11 suppliers):

- Philippines Recreational, Cultural and Sporting services
- Philippines Business services
- Malaysian Apparel
- Malaysian Hotel and Restaurant services

APAC related procurement refers to the items purchased with relation to the APAC partnership outlined in section 1 above. This procurement is managed directly by the APAC team, who conduct supplier due diligence. From 2027 onwards it is anticipated that this procurement will reduce for MSFA with the registration of a separate legal entity in Malaysia who will undertake regional procurements.

As MSFA expands its APAC workforce model, particular attention is given to ensuring local employment arrangements, employer-of-record providers and workforce partners operate in accordance with applicable labour laws and internationally recognised labour standards.

MSFA will continue to work within the APAC partnership and on the board of the MSF Asia Pacific office in Malaysia to set up processes and systems that will minimise modern slavery risk.

Moderate High Risk - MSFA related procurement, predominantly related to IMS and other staff travel (3 suppliers):

- Cote d'Ivoire Educational Facilities
- Kenyan Visa services
- Chinese Hotel and Restaurant services

IMS (International Mobile Staff) refers to teams deployed to field locations, and the procurement captured here relates to the travel and associated costs incurred in supporting their deployment.

Although there is notable consistency between the significant industry sectors from this year's risk assessment compared to last year, the specific international location of those suppliers continues to vary from year to year.

For example, significant air transport suppliers flagged in last year's risk assessment (but not this year) included Ethiopian, Indian and Papua New Guinean providers. This reflects the reality that the individual suppliers of this type with which we engage year-on-year is highly dependent on the location and resourcing requirements of current operational projects. In 2025 MSFA also entered into partnership with a new travel agency supplier and so some travel providers have moved to become second tier suppliers. MSFA will work with the new travel agency to ensure appropriate due diligence in relation to the airlines used. The centralisation of travel has enabled better reporting for example of carbon emissions and cost savings however ongoing work with the supplier is needed to ensure modern slavery risk is flagged and responded to.

OPERATIONS

STAFF

MSFA manages the deployment of Australian staff to international humanitarian projects spanning across the world. These staff are part of the international mobile team and are employed under Australian employment contracts, though they generally are working in projects run by European countries (Managing Entities). Each of these Managing Entities have strict obligations concerning their respective national laws and worker protections and the Framework Agreement between these entities and MSFA ensures that there are clear responsibilities articulated.

MSFA's staff are employed in accordance with applicable Australian employment legislation. Our recruitment policy stipulates that all candidates must undergo a right-to-work check. This reduces our risk of engaging in recruitment agencies who utilise illegal methods of recruiting and ensures workers' rights are adequately protected.

MSFA supports ethical recruitment practices and does not permit workers to be charged recruitment fees. Employees are provided with written employment agreements, receive remuneration in accordance with applicable employment laws and have access to grievance mechanisms should concerns arise.

MSFA also engages external consultants and contractors, including for fundraising activities, on a case-by-case basis.

MSFA engages with Face-to Face Fundraising subcontractors who are hired by the Lead Face-to-Face Fundraising agencies. Although these Lead Agencies are responsible for sourcing subcontractors (subject to MSFA approval) and conducting their own due diligence, MSFA also performs due diligence on the subcontracting agencies to ensure everything is in order prior to the contracting stage. This includes requiring supporting documents such as payslips and relevant policies, such as company policies and Work, Health and Safety policies.

Other requirements for partnering with agencies of this kind include demonstrating an implemented Code of Conduct, police checks on company Director(s) and disclosure of other relevant materials to ensure we only engage reputable providers.

INTERNATIONAL GRANTS

MSF Operational Directorates spread across 7 different locations, mostly in Europe, with two entities operating out of Africa. **MSFA** works closely with operational directorates in Paris and Geneva, including for dispersing grants and funding. Despite representing a significant proportion of **MSFA's** overall expenditure, MSFA does not exercise executive control or oversight for the procurement decisions these funds and grants finance. Instead, the use of these funds is guided by Operational Directorates and their individual processes and protocols, consistent with the practices of MSF Global. **MSFA's** limited control over international Operational Directorates reflects the longstanding governance structure of MSF Global, where procurement responsibility is primarily delegated to the operational teams on the ground.

During the reporting period MSFA has worked with its primary Operational Directorates in Paris and Geneva to develop new grant agreements which stipulate explicitly the adherence of the Operational Directorates to Modern Slavery legislation and ensure that this risk is being monitored and mitigated.

MSFA's procurement function continues to work closely with MSF's International Office Procurement function. Together **MSFA** refines and enhances policies and procedures, including ethical sourcing and in-depth modern slavery assessments.

MSFA led the development of an International formal framework of consultancy guidelines which is intended to provide clearer processes, definitions and more robust risk assessment when engaging with consultants. This is expected to be approved by MSF's International Office by the end of 2026.

We did not receive any reports, complaints or other disclosures of any actual or suspected modern slavery incidences within our supply chains and operations during the reporting period, however recognise that this does not mean that modern slavery risk is not present. We remain committed to implementing processes to reduce risk wherever possible.

OVERVIEW OF KEY ACTIONS TO ADDRESS AND MITIGATE RISK IN 2025

Internal Training and Awareness Raising

In line with our ongoing goal to continuously improve stakeholder training on modern slavery issues, during 2025, MSFA again undertook education and training initiatives notably a review of the online modern slavery e-learning content in Elmo which was shared again with existing staff as well as new starters

This is now a mandatory component of MSFA's staff onboarding process. All staff undertake annual refresher training on modern slavery issues (which occurred through an organisation-wide initiative in February 2025).

The **MSFA** Board held a discussion on modern slavery in June 2025.

In 2025, our procurement manager took the lead with primary responsibility for the preparation of this year's Statement. As this was a new responsibility, the manager completed several training courses in modern slavery risk mitigation and reporting.

Due Diligence, Risk Assessment and Supplier Engagement

Significant further progress was made in these areas during the reporting period, including through the incorporation of anti-slavery clauses into all new **MSFA's** supplier contracts.

MSFA undertakes internal risk assessments on suppliers. Those deemed high-risk are required to participate in our Request for Proposal process, which incorporates anti-slavery due diligence measures, and requires suppliers to review and disclose policies, procedures and other relevant documentation. Suppliers are also required to respond to specific modern slavery related questions in our Supplier Assessment Form.

Suppliers engaged in activities assessed as high risk for modern slavery are required to sign MSF's Supplier Code of Conduct as part of the contracting process. This includes the following statement on Modern Slavery:

Prohibition on Modern Slavery: Suppliers must acknowledge and actively address the risk of modern slavery within their operations and supply chains. They are obliged to:

1. conduct regular assessments to identify and mitigate the risks of modern slavery, documenting any actions taken and improvements made;
2. ensure transparency, which includes upon MSF's request, providing MSF with detailed reports on the measures implemented to combat modern slavery;
3. where requested, collaborate with other stakeholders, including NGOs, government bodies, and communities, to amplify the impact of anti-slavery initiatives;
4. provide training and awareness programs to employees and supply chain partners to recognise and report potential indicators of modern slavery.
5. Suppliers operating outside Australia or New Zealand must align their anti-slavery initiatives with the legislative requirements of the *Modern Slavery Act 2015* (NZ) and the *Modern Slavery Act 2018* (Cth), having regard to MSF's most recent Modern Slavery Statement, which can be found at: https://modernslaveryregister.gov.au/statements/?q=medecins+sans+frontieres.

From 2026, this requirement has been extended to all suppliers with annual spend above $10,000, in line with guidance from the MSF's Global Procurement Team.

Governance and Policy

MSFA's Board continues to be ultimately responsible for our overall modern slavery response, with additional oversight, guidance and leadership being provided through our FRAC Committee.

A well-developed framework of integrated internal policies is implemented to strengthen our response to modern slavery issues, including:

- Procurement Policy (including our template Supplier Assessment Form; Risk Assessment Form; and Supplier Code of Conduct – content from the Supplier Content is included above)
- External Complaints and Grievance Policy
- Internal Complaints and Grievance Policy

- Whistleblowing Policy
- Equal Employment Opportunity, Discrimination and Harassment Policy
- Child Protection Policy
- Travel Policy
- (External) ACNC's External Conduct Standard
- (External) Public Fundraising Regulatory Association's Fundraising Standards

MSFA is committed to regular review and improvement of our policies.

Grievance Mechanism

In 2025, we updated our Whistleblowing and Grievance policies which more comprehensively support our approach to address and mitigate modern slavery risk.

To ensure correct implementation of these updated policies, we engaged an external grievance procedure specialist provider, Stopline, to provide our Executive and Leadership teams with targeted training on effective grievance procedures. Internal training on our updated grievance mechanisms will be provided to staff during 2026.

These mechanisms are available to employees, contractors, consultants, volunteers and other stakeholders to raise concerns relating to suspected modern slavery, labour exploitation or unethical conduct.

3. MEASURING EFFECTIVENESS & LOOKING FORWARD

An important metric for measuring the effectiveness of our modern slavery response (including risk assessment and mitigation) is to continually track planned actions outlined in the previous reporting period against what actually occurred in 2025. A snapshot of this approach is outlined in the following table:

Pillar	Planned Action identified in 2024 Statement	Progress Update for 2025
Internal training and awareness	MSFA will continue to facilitate regular awareness and education campaigns to ensure our workforce (including contracted staff) are equipped to administer modern slavery related functions and processes linked to their roles.	**Complete and Ongoing** Training activities occurred throughout the reporting period , including refresher workshops – as outlined on page 11 above.
	Further integrate modern slavery considerations within MSFA's	**Complete and Ongoing** All high-risk suppliers are required to disclose implemented actions for

Due diligence and risk assessment	procurement processes, including during ongoing supplier management and end of contract performance review.	addressing modern slavery risks, including relevant policies and procedures and sign the supplier code of conduct as noted above on page 11.
	Continue comprehensive supplier risk assessment and utilise results to inform procurement decisions.	**Complete and Ongoing** As part of the Request for Proposal process, suppliers are required to complete the MSF Australia and New Zealand Supplier Assessment Form, outlining the measures they have in place to address Modern Slavery risks. This form helps MSF assess a supplier's suitability and compliance before entering a contract.
	Work with the International Office Procurement function to improve visibility across international purchasing practices.	**In progress and Ongoing** MSF's International Procurement team regularly shares updates and guidelines with the global procurement community on negotiated agreements. The international team leads these tenders and conducts due diligence on all prospective suppliers.
Supplier engagement	Continue to work with suppliers with elevated risk exposure, including reviewing leverage to engage with overseas suppliers.	**In progress and Ongoing** MSFA continues to work with high-risk suppliers where appropriate under our internal risk management framework. In 2026 MSFA will work with our new travel agency to assess opportunities to manage higher risk exposure suppliers.
Governance and Policy	Continue to mature our ESG committee and Board capabilities, including through delivery of tailored modern slavery training sessions.	**Complete and ongoing** In-depth discussions on modern slavery reporting with the ESG Committee, FRAC and Board occurred in mid-2025.
Grievance mechanism	Train staff on the new revised Grievance Policy and Whistleblower Policy.	**Complete** Board and LT have received training on the new Whistleblowing Policy from external supplier Stopline.

MSFA remains committed to strengthening our ongoing response to modern slavery. As an organisation that exists solely to help others in their time of greatest need, we recognise the important role we play on this issue.

In pursuing continuous improvement for our overall modern slavery response framework, identified focus areas for 2026 include:

- Ongoing and deepening collaboration with MSF’s International office, particularly in strengthening approaches for identifying and managing modern slavery risks across the entire organisation.

- Increased training and awareness raising of staff to more fully understand, and engage with, modern slavery issues across the full scope of our operations and procurement activities. This will also include providing staff with resources on modern slavery every quarter to further increase awareness and engagement.

- Undertake a comprehensive desktop audit of key supplier, (s) with an assessed elevated potential modern slavery risk, including working with new travel agency to assess high risk suppliers in the travel industry.

Modern Slavery Statement 2025

Final Audit Report 2026-06-24

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