



DT Global

DT Global Australia Holdings Pty Ltd *Modern Slavery Act Statement*

Reporting period: 31 March 2025 – 31 March 2026

Submitted: 2 April 2026



1 Introduction and Reporting Entities

1.1 Entity structure

This Modern Slavery Statement is prepared and submitted by DT Global Australia Holdings Pty Ltd (ACN 660 152 858).

DT Global Australia Holdings Pty Ltd (ACN 660 152 858) was established in June 2022 and is a subsidiary of the ultimate controlling entity DT Global LP, a Bermuda limited partnership with the majority owned by GPD Charitable Holdings Ltd. The broader DT Global group is referred to hereafter as 'DT Global'.

DT Global Australia Pty Ltd (ACN 633 607 468) and DT Global Asia Pacific Pty Ltd (ACN 006 170 869), formerly Cardno Emerging Markets (Australia) Pty Ltd, are both wholly owned subsidiaries of DT Global Australia Holdings Pty Ltd (herein collectively referred to as 'DT Global APAC').

The acquisition of Cardno Emerging Markets (Australia) Pty Ltd, now DT Global Asia Pacific, in June 2022 by DT Global Australia Holdings Pty Ltd increased the company's annual consolidated revenue to more than A\$100 million. Prior to the acquisition, DT Global Australia Pty Ltd did not meet the mandatory reporting threshold under Australia's *Modern Slavery Act*, and the former Cardno entity reported as part of the broader Cardno group.

This statement captures the actions that DT Global APAC has taken to further assess and address modern slavery risks in our operations and supply chains since our last report (submitted March 2025), and updates and progress against our Modern Slavery Road Map.

1.2 About DT Global APAC

Our services and clients

DT Global APAC delivers international development services globally, working in partnership with communities, governments, and the private sector to deliver innovative solutions that transform lives and address the world's greatest challenges.

From early-stage crisis and stabilisation assistance through to economic development, governance, and environmental work, DT Global APAC works to positively impact lives. We work across a range of principal development areas including:

- economic growth
- environment and infrastructure
- governance
- human development.

DT Global has corporate offices in Africa, Australia, Europe, United Kingdom, Kenya and the United States, and our global portfolio spans around 90 countries.

Our clientele in the Asia–Pacific region includes the Australian Government Department of Foreign Affairs and Trade, New Zealand Ministry of Foreign Affairs and Trade, Asian Development Bank, World Bank, and the Millenium Challenge Corporation.

Our operations and supply chains in APAC

Most of DT Global APAC's operations encompass the delivery of professional services in the Asia–Pacific region. We have a regional team of around 2,000 personnel and technical experts working in more than 35 countries to solve complex problems, having done so for more than 60 years. These personnel and experts are engaged directly by DT Global APAC.

DT Global APAC's broader supply chain includes goods and services that are provided directly by our Tier 1 suppliers in the countries that we are working in (for example, provision of consultancy services, construction contractors, office cleaners, security guards, transportation and hospitality); as well as products and services used by both our direct (Tier 1) and indirect suppliers in our supply chain (for example, low-skilled labour, building materials, and large-scale procurements on infrastructure development programs).

2 Modern Slavery Risks in our Operations and Supply Chains

DT Global APAC recognises that within the geographies that we operate, human trafficking and modern slavery remain a significant challenge.

We recognise the urgency of tackling the issue of modern slavery, especially given our presence in several countries in the Asia Pacific region that face challenges which increase vulnerability to modern slavery. These challenges include governance issues; discriminatory social norms; political inequality and stability; and economic insecurity. Vulnerability has also been compounded by the COVID-19 pandemic and ongoing climate-related disasters.

The Global Slavery Index conservatively estimates that in this region, there are 29 million people living in slavery, making up more than 50 per cent of the global estimate and the third highest regional prevalence of modern slavery in the world.¹ DT Global is well positioned to act, and commit to eradicating modern slavery.

We continue to review and consolidate our frameworks and approaches to assessing and addressing modern slavery risks in our operations and supply chains, and our broader safeguarding frameworks and approaches.

In our last statement we captured this approach in a 'Modern Slavery Roadmap' which articulated some key steps towards strengthening and improvement.

In this section of our statement, we outline key activities specific to understanding and assessing modern slavery risks in our operations and supply chains covering previous, and this, reporting period. We also include some analysis and findings of our first modern slavery supplier screening.

2.1 Assessing modern slavery risks at DT Global – an evolving approach

Dt Global is committed to continuous improvement relative to identifying and better understanding modern slavery risks associated with our business.

This has been an iterative process for our business, starting with an initial assessment in 2020, right through to our current approach, as captured below.

- In 2020, an initial review (a 'Foundational Modern Slavery Assessment and Issues Review') provided limited insight into existing strengths and gaps and an initial set of recommendations to better address modern slavery risks.
- In 2024, a modern slavery risk review ('Modern Slavery Risk Review – Solar Electrification in Papua New Guinea') was undertaken by an expert consultancy to better understand modern slavery risks associated with solar electrification work (on- and off-grid) on one of our Australian Government-funded programs in Papua New Guinea (PNG). This Risk Review provided many useful insights to further inform and improve DT Global APAC's approach to modern slavery risk management.
- As reported in our last statement, in 2025 we developed and articulated a 'Modern Slavery Road Map' to strengthen our approach to managing modern slavery risk, including updated governance mechanisms, policy frameworks and several critical tools.
- In this reporting period, we have completed our first round of batch supplier screening—using a customised 'Modern Slavery Supplier Risk Screening Tool'—and are working through the initial findings from that first batch screening. The analysis from that tool is captured in the section below.

2.2 Our latest insight into risks – our Modern Slavery Supplier Risk Screening Tool

During this reporting period, DT Global commissioned an expert advisory firm to build us a customised, fit-for-purpose supplier screening tool for use on an ongoing basis.

The 'Modern Slavery Supplier Risk Screening Tool' will be used to retrospectively batch screen (every six months) all of DT Global's Tier 1 suppliers to identify at the portfolio level our highest-risk geographies; supplier types; which of our programs hold the most modern slavery risk; and an overall 'picture' of our top 10 riskiest suppliers.

Broadly speaking, leveraging this tool for supplier risk assessments will enhance our understanding of human rights risks across the supply chain, identify modern slavery 'hotspots', and support us to make more informed decisions on supplier engagement and risk mitigation.

¹ [Key Findings from the Global Slavery Index](#)

Scope of the screening tool

The Modern Slavery Supplier Risk Screening Tool was utilised during this reporting period to estimate the modern slavery risk inherent within approximately 2,560 of DT Global's Tier 1 suppliers and rank them using two separate lenses. The tool assessed risk from each supplier's geography and industry; and then added relevant adjustments tailored to DT Global's business context.

Suppliers were assessed against national, sub-national, and industry-level risk scores using the human rights indicators identified as most relevant for DT Global, namely:

- child labour
- forced labour
- decent wages
- occupational safety and health, and
- gender discrimination.

Initial batch screening – what we learned

The initial batch screening and analysis was provided by the advisory firm in March 2026, and DT Global is in the process of discussing the findings and recommendations at the time of writing this statement.

However, preliminary findings of the batch screening include the following:

- **Geographically diverse:** DT Global's supply chain is geographically diverse. While Pakistan, India, and Cambodia present the highest inherent risk, supplier presence in these markets is limited. Greater exposure arises in PNG, Solomon Islands, and Indonesia which are complex markets where DT Global has many suppliers. Australia accounts for the highest supplier spend but is comparatively lower risk.
- **Many riskiest suppliers from few industries:** Most of DT Global's highest risk suppliers are concentrated in a few 'sub-industry categories' including construction materials; air freight and logistics; marine transportation; and hotels, resorts and cruise-lines. These sub-industries are generally where outsourcing, migrant labour, and limited oversight increase exposure to modern slavery. The majority of DT Global's lower risk suppliers operate in the categories of diversified real estate activities; research and consulting.
- **Highest program risk – geography and sector base:** Several DT Global programs working in PNG and Indonesia were identified within DT Global's program portfolio as carrying the highest average human rights risks. These programs tend to focus on infrastructure development and are in emerging markets with elevated human rights risks.

Initial recommendations, under further discussion with the firm and across DT Global stakeholders at the time of writing this statement, include the following:

- Targeting of DT Global's top riskiest suppliers by appropriate segmentation and risk threshold and determination of next steps for these higher risk suppliers during the next reporting period.
- Adapting and finalising a supplier engagement escalation process for DT Global that has been built into the risk screening tool, clarifying and codifying what to do with certain risk results.
- Exploring how the tool can be expanded beyond Tier 1 suppliers, potentially as a procurement pre-screening tool.

DT Global will continue to work through these findings and recommendations during the next reporting period.

3 Actions Taken to Assess and Address Modern Slavery Risks

During the reporting period, a range of factors, including updated client requirements and standards specific to safeguarding², resulted in a comprehensive review and update to DT Global's safeguarding policy framework, which is closely aligned to DT Global's modern slavery policy framework.

Reviewing the safeguarding framework more holistically presented several positive opportunities for DT Global to also review key modern slavery risk assessment and management approaches. These key actions for this reporting period are outlined below.

3.1 Governance – Modern Slavery Working Group

DT Global's multi-disciplinary Modern Slavery Working Group remains a core group that drives key deliverables captured in the Modern Slavery Road Map.

² For DT Global, 'safeguarding' refers to how we keep people and the environment safe from harm. This includes children and vulnerable groups that we interact with as beneficiaries; partners who we collaborate with to deliver our programs; government stakeholders who we support; and importantly, our own personnel. We are also referring to the key actions that we take to protect people from harm associated with child abuse and exploitation; sexual exploitation, abuse and harassment; and modern slavery.

Members of the Working Group were engaged in discussions and reviews of the 'Modern Slavery Supplier Risk Screening Tool'; updated modern slavery procedure; and early draft outlines of our updated modern slavery training content.

3.2 Policy framework

DT Global APAC's policy framework reflects our commitment to the elimination of all forms of slavery within our operations and supply chains.

Our global policies (including an Anti-Slavery and Human Trafficking Policy) are supplemented by geography-specific policies and procedures relevant to each business context and risk profile, all of which are centrally available and accessible by our personnel and communicated clearly with suppliers and other key stakeholders.

During the reporting period, DT Global updated its safeguarding procedures to reflect updates in the way that we manage safeguarding, and modern slavery, risks.

Updated modern slavery procedure and tools

DT Global updated our safeguarding and modern slavery procedures (with modern slavery as a work in progress at the time of writing this statement), consulting with internal and external safeguarding and modern slavery experts—particularly those from our ASEAN-ACT program which is an Australian Government counter-human trafficking program—to reflect the following:

- Our broader approach to safeguarding (encompassing modern slavery) and our five step '**safeguarding cycle**' which is intended to be instructive for DT Global programs, partners and suppliers. The cycle includes the following key steps which are:
 - **Identifying potential risks**, including those specific to local contexts, sectors and activities that we are implementing.
 - Creating environments that proactively **protect from harm** by embedding key safeguards standards across all areas of our work.
 - Helping people to feel safe to '**let us know**'; ensuring that if something happens they have safe, accessible platforms to do so; and that we have trained personnel ready to support them.
 - **Responding** when harm or incidents occur in a way that does not cause further harm or trauma and reflects the wishes and preferences of the victim/survivor.
 - And **learning**, so that our approach to keeping people safe remains reflective, dynamic and effective.
- DT Global APAC also has developed and articulated a set of five key 'standards' specific to safeguarding and modern slavery. The standards reflect good practice and are intended to remove confusion for programs, our partners and suppliers about what minimum actions they need to take to identify and manage modern slavery risks. The DT Global standards apply and flow down to all of our partners:
 - Standard One: Policies, procedures and Codes
 - Standard Two: Risk management
 - Standard Three: Training
 - Standard Four: Safe recruitment and responsible procurement
 - Standard Five: Letting us know.



- Finally, our updated modern slavery procedure, which will be finalised by mid-2026, will capture and reflect updated and new tools for DT Global and our partners to manage modern slavery risks, including references and links to (where relevant):
 - the ‘Modern Slavery Supplier Risk Screening Tool’
 - updated program and activity-level risk assessment tools
 - tip sheets and other resources to support the identification of modern slavery risks.

These updated procedures, frameworks and tools will support strengthening in our approach to managing modern slavery risks.

3.3 Procurement due diligence

DT Global APAC continues to focus on meaningful and transparent engagement with our suppliers so that we can work with and through them to combat modern slavery.

During this reporting period, DT Global was actively exploring, and had issued an Expression of Interest to the market for a third-party supplier management platform which we intended to use to streamline our supplier management and modern slavery obligations.

Significant shifts in the global market (particularly in the US geography) had implications for APAC and as such, our plans for this third-party supplier management platform are on hold for now.

Nonetheless, we continue to work through our established and systemised process to engaging with Tier One suppliers, per the process outlined below:

Component	Detail
Procurement / grant approaches and supplier / grantee identification	DT Global APAC’s Procurement Toolkit, Grants Manual, and Subcontractor and Grantee Compliance and Performance Management Procedure reference modern slavery risks throughout and provide guidance to DT Global APAC personnel on engagement and management of suppliers and grantees. All tender and grant making documentation references DT Global APAC’s safeguarding requirements, as does our Due Diligence Preliminary Supplier Statement.
Due Diligence	Prior to contracting suppliers and grantees, a formal Due Diligence Assessment is undertaken, which includes questions specific to the suppliers’ processes to address and manage modern slavery risks within their supply chains.
Risk assessment	Within the Due Diligence Assessment will be embedded a risk assessment tool (work in progress – see Roadmap below), which our personnel will undertake with suppliers to understand the risks of the activity that they are being engaged to undertake or product that they are supplying; their capacity to meet DT Global safeguarding and modern slavery standards; and a capacity development plan so that DT Global can work hand in hand with the supplier to support them in their own modern slavery improvement journeys. Suppliers are also required to conduct safeguarding, fraud, and corruption risk assessments upon entering into contracts with DT Global APAC.
Contract clauses	All DT Global APAC contract templates include safeguarding clauses—including explicit reference to modern slavery—in addition to inherent requirements regarding supplier / grantee induction; disclosures and reporting; due diligence; interlinkages with fraud and bribery; and warranties.
Supplier induction	Supplier inductions are undertaken prior to commencing work with DT Global APAC, utilising a standard ‘Compliance Pack’ to ensure consistency of information shared. The Compliance Pack covers content on DT Global APAC’s mandatory compliance and contract requirements, including safeguards, slavery, and risk management.
Auditing	Our internal audit program adopts a sample-based assurance methodology to monitor that due diligence practices are followed. Audits are conducted and reported at least annually as part of management review and under third party ISO9001:2015 certification. Internal audit checklists include specific questions on supplier / grantee compliance and management and safeguarding issues.

3.4 Training

Noting the updates and improvements to DT Global's procedures and governance framework, during the reporting period, DT Global APAC also commenced a process to update its revised mandatory, online modern slavery training module which is issued and completed by all DT Global APAC personnel as part of their induction, via our DT Global APAC Learning Managing Platform 'Absorb'.

The training content is being further customised to reflect the changes referenced above and will be focused on simplifying language and content for non-native English speakers, as well as making the training more interactive and based on the key principles of adult learning.

DT Global anticipates that this training update will be completed by mid-2026.

3.5 Modern slavery awareness

DT Global recognises that as a business, we have a role to play in respecting fundamental human rights and amplifying efforts to eliminate modern slavery.

DT Global is an ongoing signatory to the United Nations Global Compact and supports the Ten Principles of the UNGC on Principles on human rights; labour; environment and anti-corruption, including the elimination of all forms of forced and compulsory labour (principle 4), and the effective abolition of child labour (principle 5).

We continue to be a participant in the UN Global Compact Network Australia's Modern Slavery Community of Practice for business members.

4 Measuring Effectiveness

DT Global APAC is developing systems and tools to measure the effectiveness of actions taken to combat modern slavery, which will include following key metric for the upcoming reporting period.

- Percentage of DT Global APAC personnel that have completed their updated modern slavery training on the DT Global Learning Management System.

As DT Global APAC rolls out our Modern Slavery Roadmap, we plan to add other indicators to this list and will report on updated metrics in our next statement.

5 Reflection and Looking Forward

We recognise that although we have some strong foundational tools and approaches in place, there are gaps that we need to address to further strengthen our modern slavery awareness, risk identification, and prevention.

5.1 Modern slavery roadmap

We continue to make progress against our Modern Slavery Roadmap, with some key components completed during the reporting period, and others progressing towards completion looking forward.

Component	Timeframe	Detail
Modern Slavery Working Group	Active, ongoing	This Working Group plays a key role in driving the roll out of the Road Map, and during this reporting period has been consulted on key updates and deliverables.
Modern Slavery Training updates	In progress, to be completed mid-2026	We are in the process of updating our mandatory modern slavery training package and will re-issue to all personnel once finalised. The focus moving forward into the next reporting period will be on training package roll-out, capturing feedback, and actively monitoring compliance.
Modern Slavery Procedure	In progress, to be completed mid-2026	During the reporting period, updates to DT Global's Modern Slavery Procedure began, incorporating expert guidance and feedback from our personnel.

Component	Timeframe	Detail
		The focus moving forward will be on finalising and socialising the procedure and the various updated and new tools that sit behind it, and sharing these new tools with our partners as part of our ongoing conversation about modern slavery.
Program-level modern slavery risk screening	In progress, to be completed mid-2026	DT Global APAC is currently in the process of updating our program-level risk assessment documentation – a consolidated ‘Safeguards Risk Assessment’. This risk assessment will incorporate additional, customised modern slavery risk screening questions in addition to those focused on other safeguarding risk factors. The focus moving forward will be on further socialising this Safeguards Risk Assessment and supporting programs identified as having a higher modern slavery risk profile to address these risks.
Portfolio-level modern slavery supply chain risk assessment	Completed Q1 2026	During the reporting period, DT Global APAC engaged an expert firm to create a customised ‘Modern Slavery Supplier Risk Screening Tool’ which we can now use to retroactively batch screen all Tier 1 suppliers. Through this screening, we are identifying our highest-risk suppliers which will enable targeted monitoring and risk management approaches.
Activity-specific Safeguards Capacity and Risk Assessments (new item in the Road Map)	To be completed Q2 2026	Within the Due Diligence Assessment is embedded our Activity-specific Safeguards Capacity and Risk Assessment tool, which a risk assessment tool used to understand the risks of the activity our suppliers are being engaged to undertake; their capacity to meet our modern slavery standards; and a capacity development plan. This tool is close to finalised and will be socialised amongst our personnel and partners.


6 Consultation and Statement Approval

This statement has been compiled and reflects consultation and collaboration with representatives of DT Global Australia Holdings Pty Ltd and its subsidiary entities.

Prior to review and approval below, this statement was also considered and reviewed by DT Global APAC’s Head of Operations and Managing Director.

This statement was reviewed and approved by the office holders of DT Global Australia Holdings Pty Ltd and its wholly owned subsidiary entities DT Global Australia Pty Ltd and DT Global Asia Pacific Pty Ltd.

The office holders are Joanne Choe as Managing Director, Gerome Rich as Director, and Rozelle Bothma as Company Secretary.



Joanne Choe
Managing Director, DT Global Australia Holdings Pty Ltd
20 March 2026