



# EY Australia Modern Slavery Statement

FY21 Reporting Period



**EY**

Building a better  
working world



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*This statement covers the three reporting entities Ernst and Young (ABN: 75 288 172 749), Ernst and Young Services Trust (ABN: 67 457 905 811) and EY Business Solutions Pty Ltd (ABN: 35 122 885 465).*

*This statement has been approved by the principal governing body of Ernst & Young, Ernst & Young Services Trust and EY Business Solutions Pty Ltd on 27 October 2021.*

Message  
from  
our

Chief

Executive

Officer





At EY, our purpose is building a better working world. This includes conducting our business to the highest possible ethical standards. Freedom from slavery is a fundamental human right and as an organisation we do not tolerate any form of human rights abuse, in any part of our operation or supply chain.

Our people, whether employed locally or by our outsourced service providers, are critical to the success and sustainability of our business. Our Values and Code of Conduct continue to guide us in ensuring our people and those from whom we procure goods and services, are safe and protected against acts of modern slavery.

During the FY21 reporting period, we reinforced modern slavery controls in our procurement process and developed a comprehensive due diligence procedure for our suppliers that will enable us to monitor the improvements in our suppliers' processes over time. Furthermore, in recognition of the ongoing focus required to drive essential change, we delivered a targeted education program for specific business functions, to help continue to improve awareness of modern slavery principles and risks.

The introduction of modern slavery compliance criteria allows us to assess the effectiveness of our approach to modern slavery in a standardised way. We are pleased to report all new modern slavery controls were deemed compliant in the recent review. Throughout the year we also introduced a

formal remediation process and incident register, to assist us to better identify, prevent, mitigate and remedy any actual, or potential occurrences, of modern slavery in our operations and supply chain.

Finally, we recently published the EY Global Human Rights Statement, available for all EY people, our clients and the public to view on our website. I encourage you to read the statement which has been signed by all members of the EY Global Executive, to demonstrate our commitment to upholding and promoting human rights.

This statement reflects our ongoing commitment to take bold action against the inhumanity of modern slavery and be a voice for the vulnerable. There is still much work to be done, and we will continue to report on our modern slavery framework and the actions we have taken to address this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Larocca', with a long horizontal line extending to the right.

**David Larocca**  
CEO & Regional Managing Partner  
EY Oceania

# Our statement

This statement is made on behalf of the reporting entities *Ernst and Young, Ernst and Young Services Trust* and *EY Business Solutions Pty Ltd* (together '*EY Australia*'). This is EY Australia's second modern slavery statement, which has been prepared in accordance with the requirements of the *Modern Slavery Act 2018* (the Act) for the financial year 1 July 2020 to 30 June 2021 (FY21). Ernst and Young (EY) is a partnership and is a member firm of Ernst & Young Global Limited, a UK company limited by guarantee.

*Ernst and Young, Ernst and Young Services Trust* and *EY Business Solutions Pty Ltd*, and the entities they own or control, are managed centrally in our Australian operations, with shared governance, policies and procedures

pertaining to human rights risks. Due to this centralised management structure, a segregated consultation process pertaining to the entities owned or controlled by the reporting entities, and the reporting entities was not required. Each of the reporting entities were engaged with the entities they own or control on an ongoing basis, as part of this amalgamated approach, which greatly facilitated the preparation of this joint statement.

This statement describes our progress during our second reporting period, outlines our position, approach and key learnings in relation to modern slavery risk management and seeks to provide readers with a transparent view of our risks, actions and areas for improvement.



# Our operations + supply chain



## Our operations

EY is committed to doing its part in building a better working world. The insights and quality services we deliver help build trust and confidence in the capital markets and in economies around the world. Operating across 150 countries, EY develops outstanding leaders and teams who create long-term value for all stakeholders that leads to sustainable, inclusive growth.

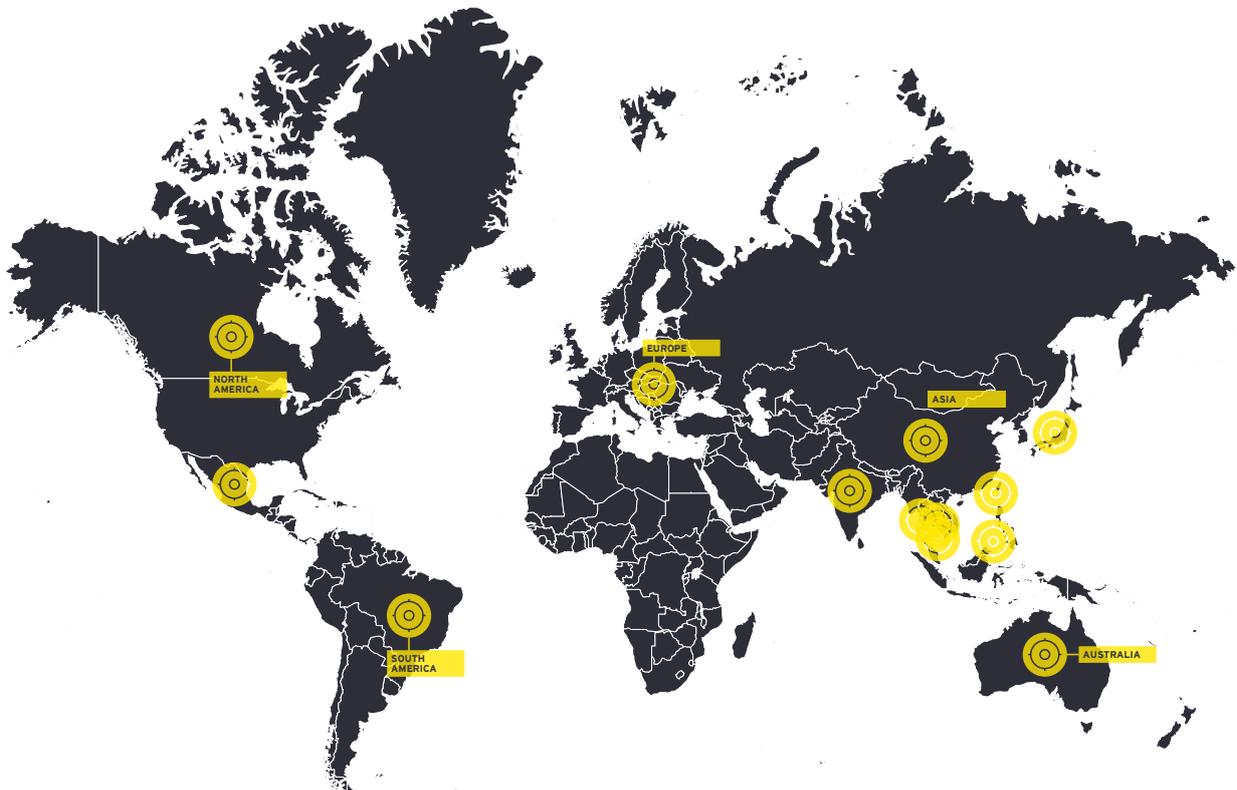
Through four integrated service lines – Assurance, Consulting, Strategy and Transactions, and Tax – and deep sector knowledge, EY helps clients to capitalize on new opportunities and assess and manage risk to deliver responsible growth. The high-performing, multidisciplinary teams at EY help clients fulfill regulatory requirements, keep investors informed and meet stakeholder needs. And in a fast-changing world, we give them the support they need to be effective today and create long-term value for tomorrow.

EY Australia employs approximately 8,000 people, who work across our eight Australian offices. Our Australian operations are supported by other EY member firms based in offshore locations, such

as India, China and the Philippines, which provide client engagement as well as business, compliance and administrative support services to our onshore teams in Australia. EY also engages third party providers to provide outsourced support services, which includes: IT help desk support, finance and accounting services, and payroll services. These services are performed by people predominantly based in India, China and Poland.

## Our supply chain

EY Australia procured goods and services from nearly 2,000 direct suppliers in approximately 25 countries during the reporting period. Although the majority of our suppliers are located within Australia, we are aware that other countries carry different modern slavery risks so we continually monitor the countries where our goods and services are produced or sourced from. This enables us to appropriately assess the modern slavery risks present in our supply chain and mitigate those where necessary. The map below illustrates the main countries from which our procured goods and services are sourced or produced.



EY Australia typically procures a large variety of products and services, across six main procurement categories. The table below outlines the types of products and services procured across these six procurement categories, as well as the countries from which they are usually sourced.

Procurement categories	Examples of goods and services procured	Key sourcing countries
TECHNOLOGY	Software, telecommunication, IT support services and technology hardware, such as laptops, monitors and peripherals	Australia, China, Taiwan, India, Brazil, Mexico, Malaysia, Thailand, Singapore, Canada, Japan, Hungary
BRAND, MARKETING+ COMMUNICATIONS	Banners, signage and promotional merchandise such as hats, t-shirts, umbrellas	Australia, China, India, Malaysia
WORKPLACE SERVICES	Office equipment, stationery, furniture and onsite services such as cleaning, catering and property maintenance	Australia, China, Indonesia
REAL ESTATE	Rent and construction products and services for office fit outs	Australia, China, India
TRAVEL, MEETINGS + EVENTS	Venues, air travel, hotels and ground transportation	Australia
TALENT	Recruitment agencies and learning and development activities and materials	Australia, India, Philippines, Singapore



# Our modern slavery risks

Continuing the work completed last year, EY Australia dug deeper into the specific areas of our modern slavery risk during the current reporting period. Our modern slavery risks were identified as part of an extensive modern slavery risk and prioritisation assessment, conducted over our operations and direct supplier base during FY20. As there had been very minimal changes to our operational structure and supplier base, we were able to easily recognise our priority modern slavery areas for FY21. By focusing efforts on these priority areas, we can evaluate and address our more pressing modern slavery risks sooner. This enables us to develop more robust controls and processes, which can be more easily applied to our broader operations and supplier base in the future.

## Modern slavery risks within our operations

EY Australia has a diversified workforce which requires a varied approach to assessing operational modern slavery risks. We separately consider the risk of modern slavery occurring within our direct employee workforce and our indirect employee workforce, provided by our offshore and outsourced service providers.

### Direct workforce

EY Australia continues to consider the risk of modern slavery occurrences within our direct employee workforce to be low. The professional services industry has an inherently lower modern slavery risk, which is further compounded by the low country risk attributed to Australia. The modern slavery risk in our direct workforce is further mitigated by the strong policy environment for workplace relations and a zero-tolerance approach to modern slavery practices. To date, we have not identified any occurrences of modern slavery in our operations.

### Indirect workforce

EY Australia considers our indirect workforce to present a relatively higher risk of modern slavery. Offshore EY member firms and outsourced service providers deliver crucial support to our operations in Australia. Whilst the EY member firms providing these services are governed by EY's global policies and procedures with respect to labour rights and conditions, the higher risk of modern slavery is resultant from known labour rights issues with offshore and outsourced business operations.

Whilst a strong policy environment may reduce the residual modern slavery risk in our indirect workforce, greater care is required to address the modern slavery risks which may be present in these higher risk countries. Although the strong impact of COVID-19 on these geographical regions reduced our ability to conduct further due diligence during the reporting period, we are committed to working with our offshore member firms and outsourced service providers to better understand how their modern slavery risks can be effectively managed.

## Risk & Prioritisation Assessment Criteria

The EY Modern Slavery risk assessment considers both the inherent country and industry risks:

- ▶ **Country risks are determined through an analysis of credible indexes and databases, for example the International Labour Organisation Statistics on forced labour, modern slavery and human trafficking.**
- ▶ **Industry risks are determined by considering known industry risk factors such as, the use of unskilled, temporary or seasonal labour, short-term contracts, outsourced labour, foreign workers, the presence of opaque intermediaries, as well as whether there are known labour rights controversies within the industry.**

In order to appropriately focus our due diligence efforts and resources, we prioritise certain suppliers based on a number of factors:

- ▶ **The level of inherent modern slavery risk present**
- ▶ **The causal link between EY and labour rights issues occurring, including the degree of influence we have over the supplier**
- ▶ **Whether the product of service is core to our business operations**

**Subcontractors**

From time to time, EY Australia may require assistance from individuals or companies in the delivery of client services, or to undertake internal (non-client) work for EY. EY Australia has a dedicated policy to appropriately identify and manage risks in entering subcontractor arrangements with third parties.

Whilst EY has a dedicated independence, quality, legal, and risk management consultation processes for engaging with subcontractors, we acknowledge that greater consideration for modern slavery is required to effectively manage the risks associated with subcontractors. We intend to continue our review of the current procedures for engaging subcontractors and identify controls which can be implemented to manage subcontractor modern slavery risk.

**Our indirect workforce**

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**Offshore workforce**

WHO	WHAT	WHERE
EY member firms located in countries outside of Australia	Support our Australian based employee workforce with business, compliance and administrative support services and engagement delivery	Predominantly located in India, China and the Philippines

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**Outsourced workforce**

WHO	WHAT	WHERE
Outsourced service providers contracted to provide particular services	Support our onshore operations by providing payroll, finance and accounting and technology support services	Locations include India, China, Poland and the Philippines



## Impact of COVID-19

EY Australia acknowledges that there is an increased risk of vulnerable workers in our operations and supply chains becoming exposed to modern slavery as a result of the COVID-19 pandemic. COVID-19 has placed an unprecedented pressure on global supply chains and we recognise the important role we play in ensuring vulnerable workers are not taken advantage of during this time.

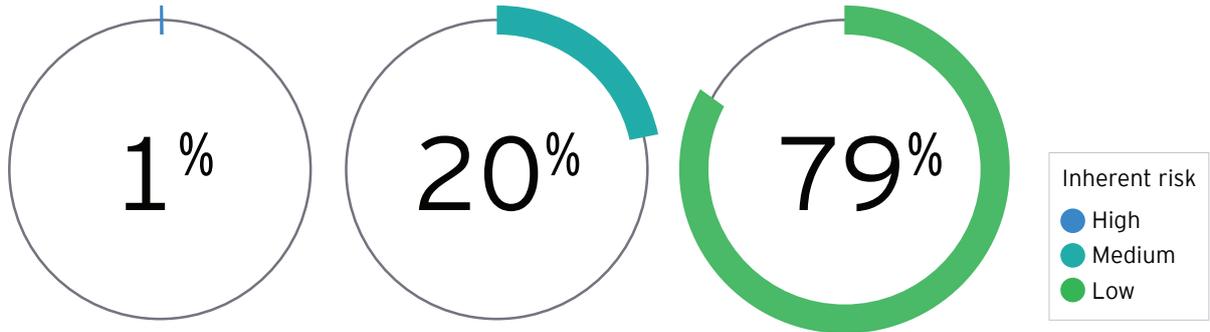
We are committed to maintaining supplier relationships and fostering open communication with suppliers about COVID-19 risks. We will continue to collaborate with suppliers, workers, business peers, investors, civil society and peak bodies to identify best-practice approaches to protect and support vulnerable workers in our operations and supply chain.

# Modern slavery risks within our supply chain

The modern slavery risk level of our suppliers is determined by assessing factors such as the risk attributed to the supplier's industry or sector, along with the country or location in which they operate. Last year, EY Australia conducted a supplier risk and prioritisation assessment to determine the risk levels of our direct suppliers, as well as the particular products and services which presented a higher inherent risk of modern slavery.

The figure below contains breakdown of the inherent modern slavery risk level of our direct supplier base.

**Direct suppliers - Inherent modern slavery risk level**



Our direct 'higher risk' or priority suppliers operate across a range of different industries and sectors, as depicted in the figure below. This has helped us identify the priority modern slavery risks in our supply chain.

**Priority suppliers - Industry breakdown**



## **Cleaning services**

Although cleaning services present a moderate inherent risk of modern slavery, cleaning contractors formed the largest proportion of our priority suppliers which has led to an increased focus on this sector. Modern slavery risk factors in the cleaning industry include the prevalence of migrant labour, the low skilled nature of the work and the known controversies of underpayment and poor treatment of workers. Awareness of these risk factors is important when dealing with our cleaning suppliers and has resulted in a relatively higher level of scrutiny when performing due diligence over these suppliers.

## **Technology Hardware**

EY engages large international technology companies to procure a range of different technology hardware products. When the modern slavery risk and prioritisation assessment was completed in FY20, technology hardware was considered one of the highest areas of priority in our supply chain.

This is mainly due to widely known systemic labour issues in the technology hardware industry. Furthermore, the products acquired from these large international technology companies are typically manufactured in countries carrying a high modern slavery risk, including China, Taiwan, India, Brazil and Mexico. We also recognise the high inherent risks of modern slavery present further down the supply chains of their products, such as forced labour in the manufacturing of electronic parts.

Whilst our technology suppliers have demonstrated an unwavering willingness to cooperate and provide valuable information regarding their modern slavery risk controls, we understand that this is a widespread problem that they may currently struggle to exercise control over. We are committed to continuing to work with these suppliers to identify ways in which these modern slavery risks can be mitigated.

## **Merchandise and Stationery**

Promotional merchandise and office stationery suppliers were identified in our risk and prioritisation assessment as presenting a high risk of modern slavery. This was due to high country risks, industry risks and widely known labour rights issues associated with the manufacturing of these products, such as excessive working hours and substandard working conditions.

Our priority suppliers in this area continue to demonstrate established controls to mitigate modern slavery risks, however the ongoing labour rights issues in this industry mean we will continue to monitor this area of our supply chain.

## **Recruitment**

Suppliers involved in the recruitment of employees form a notable proportion of our priority suppliers. We are aware of the modern slavery risks associated with the recruitment sector, such as agents or labour hire agencies targeting specific individuals and groups from marginalised or disadvantaged communities. We expect our suppliers to be aware of proper recruitment practices, such as the principles for safe migration, charging of recruitment fees for migrant workers and document retention. Following a decrease in recruitment activity in FY21, we anticipate an increase in the recruitment of employees during the next reporting period and so will place a greater focus on these suppliers.



# Approach to managing modern slavery risks

# Responsibility of the framework

The Risk Management business function continues to hold the main responsibility for the overarching management of EY Australia's modern slavery response. The day-to-day implementation of controls and activities sits within the relevant business functions, which include, among others, Procurement, Legal, Talent and Workplace Services. Where necessary, colleagues from the EY Global organisation and Human Rights Specialists within the EY Climate Change and Sustainability Services team were consulted with during the reporting period, to provide expertise and further support EY Australia's progress.

The EY Australia modern slavery framework continues to grow and evolve as a result of new or improved controls, stakeholder feedback, increased collaboration with regional counterparts, as well as the changing human rights landscape. We have noticed a marked increase of focus on modern slavery from employees, suppliers and clients. Increased awareness and accountability in this area will facilitate greater improvements and assist further development of our modern slavery framework.

# Policies and procedures

EY Australia has a strong policy environment which guides how we work. The extensive suite of policies and procedures embed modern slavery considerations across all areas of the business, from recruitment and procurement to engagement with clients.

Examples of the policies and procedures which strengthen our control environment pertaining to modern slavery risks are provided below.

**Global Code of Conduct** Sets forth our commitment to integrity and professionalism, providing a clear set of standards for all of our business practices

**EY Ethics Hotline** Provides a platform for EY people, clients, suppliers and others outside the firm to raise grievances or concerns through a confidential and anonymous channel

**Whistle-blowing Policy** Sets out the principles for making, receiving, investigating, and addressing disclosures raised by whistleblowers

**Employment agreements** Clearly communicates employees' working rights and terms of employment, including, working hours, remuneration and notice periods

**Global Procurement Policy** Sets out the minimum requirements and prohibitions with respect to the purchasing of goods and services on behalf of EY

**Global Supplier Code of Conduct** Establishes a shared understanding with suppliers of our minimum expectations and standards regarding modern slavery

## Supplier service agreements

In FY20, we integrated modern slavery provisions into our supplier Standard Services Agreement templates. The provisions set out EY Australia's expectations, including our minimum modern slavery standards, and provides EY Australia a right to audit our suppliers with respect to labour rights practices in the suppliers' operations and supply chain. We realise that supplier contracts may take different forms and different suppliers may use different contracts. Therefore, we now require that a robust modern slavery provision is present in all formal supplier contracts, regardless of the form of those contracts.

During the reporting period, we developed guidance to highlight the requirements of a robust modern slavery contract provision. The straightforward guidance provides our people with step-by-step instructions on how to review a modern slavery clause, as well as the necessary stipulations for a modern slavery clause to meet the minimum EY standard.

The process for contracting suppliers can be complex and to understand this further, we conducted a deep dive into areas where it may be more common for suppliers to use non-EY agreements. This was to understand the extent to which supplier contracts in these areas adequately address modern slavery. We held discussions with Procurement staff responsible for contracting Technology and Real Estate suppliers to gain a deeper understanding of how these suppliers are contracted and how we can confirm that these agreements appropriately address modern slavery. The learnings from these discussions will be applied in our due diligence over these supply chain areas in the future.

## Training

One of the largest areas of progress during the reporting period was the development of a modern slavery training program. Modern slavery training will now be provided across EY Australia in two streams.

### Introductory training

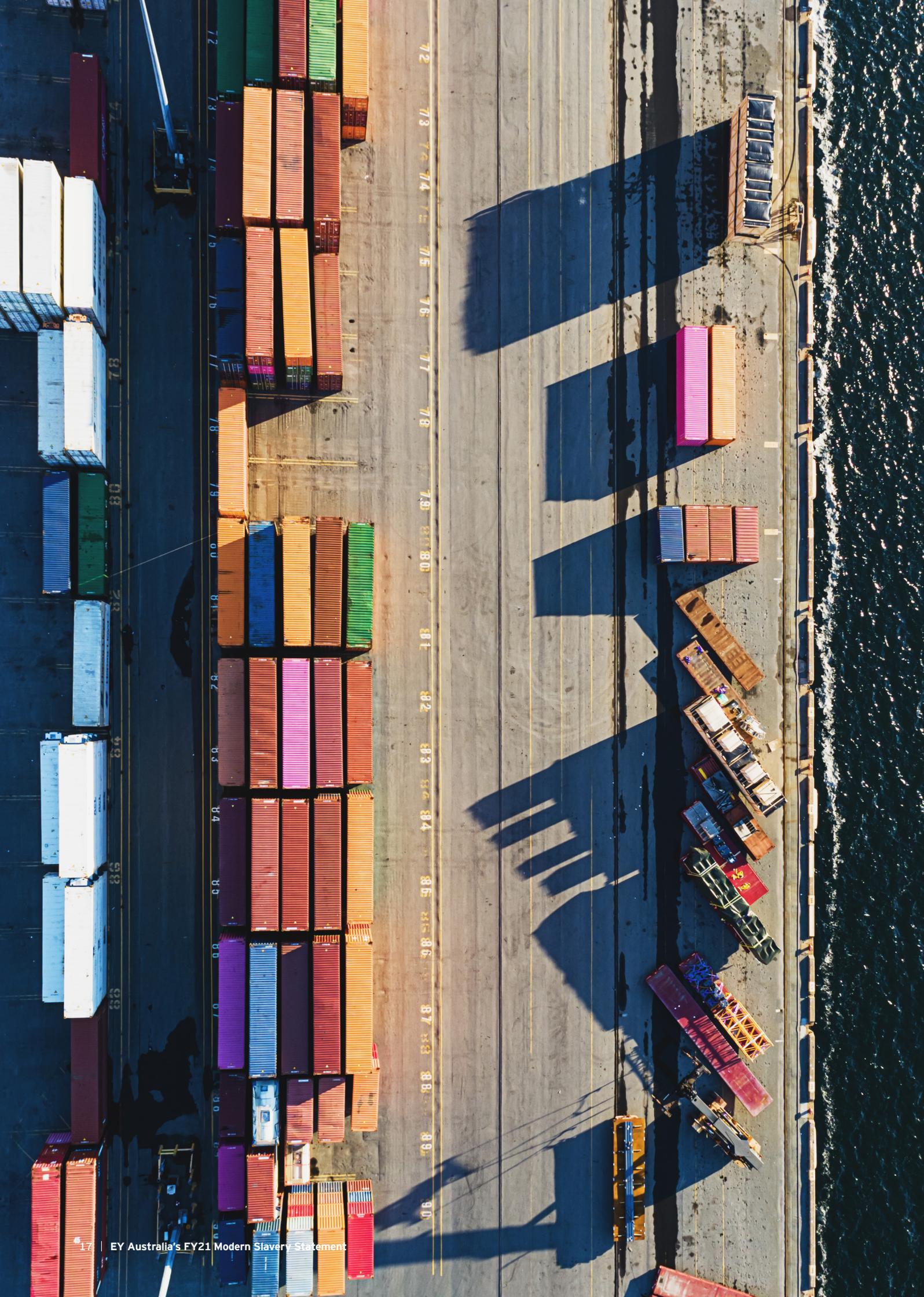
As part of our modern slavery training program, we developed an 'Introduction to Modern Slavery' web-based learning module. This module will be rolled out for specific business units which we identified as requiring a greater awareness of modern slavery principles. This includes those from the following areas:

- ▶ Talent & Human Resources
- ▶ Legal
- ▶ Brand, Marketing & Communications
- ▶ Workplace Services

People in these areas may be involved in the procurement of goods and services for EY Australia or may maintain business relationships with suppliers from our priority modern slavery risk areas. Consequently, we will provide them with foundational modern slavery training to make them aware of modern slavery risks and how they can be reported.

### Procurement Training

Our Procurement team has significant exposure to our suppliers and so are well placed to identify potential modern slavery risks in our supply chain. A targeted training seminar for the Procurement team was formulated to further enhance their awareness of modern slavery risks and train them in the relevant procurement processes and protocols related to modern slavery. Procurement staff responsible for the procurement of goods and services for EY in Australia were required to attend the training session and will be asked to complete refresher training on an annual basis.



## Operational Due Diligence

Modern slavery risks in our operations are managed by taking advantage of our existing strong policy environment for workplace relations. EY Australia maintains a zero-tolerance approach to modern slavery practices which is supported by our robust governance structure. All Australian employees are afforded working entitlements in line with Australian legislation. Direct employees are subject to a thorough onboarding process that includes confirmation of their visa status, a register of all employees on a working visa is maintained by the Talent team. All new employees must complete a policy affirmation which includes a confirmation to abide by the Global Code of Conduct.

All EY support staff located in offshore member firms are governed by EY policies relating to labour rights, entitlements and health and safety. Although our offshore and outsourced operations are also subject to working rights in accordance with local law, further work is required to understand how effective the modern slavery control environment is in these overseas locations. Enhancing due diligence over this aspect of our operations remains an area of focus for EY Australia and we are motivated to work alongside our colleagues in these locations to further drive improvements.

## Supplier due diligence

### Review of supplier due diligence process

In FY20, we introduced a risk-based approach to modern slavery supplier diligence, prioritising suppliers by level of inherent risk, which informs the appropriate level of due diligence for supplier selection. We reviewed the supplier due diligence process during the reporting period to identify areas for improvement, maintaining a minimum level of diligence for all suppliers, irrespective of risk.

We have now refined our supplier due diligence process which is summarised in the image across.



EY Australia is currently developing a specified audit plan with detailed modern slavery criteria, to be able to conduct virtual or (where feasible) physical site audits of our priority risk suppliers. These priority risk suppliers will be selected based on a number of factors, such as whether the supplier is operating in a high risk area of our supply chain or if the supplier's response to the *Modern Slavery Supplier Diligence Questionnaire* warrants further inspection.

### FY21 Due Diligence Activities

In line with our risk-based approach, during the reporting period we conducted due diligence activities over a selection of our suppliers with a high residual risk of modern slavery through the deployment of our *Modern Slavery Supplier Diligence Questionnaire*. Our risk management experts reviewed the suppliers' responses and conducted further enquiries where required.

Our suppliers continued to demonstrate a strong level of engagement through their responses, which enabled us to gain a further understanding of the suppliers' approach to managing modern slavery risks. Typically, suppliers demonstrated an appropriate level of awareness of labour issues and modern slavery, provided assertions and supporting documentation regarding how they manage these risks. Refer to the figure below for some insights on our priority suppliers' responses to the FY21 *Modern Slavery Supplier Diligence Questionnaire*.



## Global Procurement Tool

EY Australia worked closely with our Global Procurement colleagues in the development of a Global Procurement Tool used for the screening and onboarding of new suppliers. The Tool allows suppliers to directly input relevant information which can then be reviewed and assessed by EY personnel. After responses to the modern slavery questions are reviewed by the appropriate subject matter expert, a designated modern slavery risk rating can then be assigned to the supplier in the Tool, providing a centralised record of modern slavery information.

EY Australia continues to collaborate with Global Procurement to drive further improvements in EY's approach to managing modern slavery risks and ensuring consistency across different regions. This concerted approach increases efficiency in the development of new controls, providing a greater global perspective and approach to a global issue.

## Remediation

During the reporting period, EY Australia developed a formal procedural document which outlines the process for responding to and remediating incidents of modern slavery, which may be identified in the EY operations or supply chain. This remediation procedure operates in conjunction with our already established EY Ethics Hotline investigation and escalation process, whilst dealing specifically with reports of modern slavery-related issues or incidents, with the aim of remediating such incidents appropriately.

To capture potential modern slavery concerns or issues in this process, EY Australia has widened the scope of the remediation procedure to extend beyond the most notable forms of modern slavery and include practices such as underpayment of workers or substandard working conditions. For this process, a Modern Slavery Incident is one which relates to the potential, actual or perceived exploitation of workers, either in EY Australia's internal operations (onshore, offshore, direct or indirect), or within EY's supply chain.

The general approach to remediating a Modern Slavery Incident is depicted below:



All Modern Slavery Incidents must be reported as soon as practicable to Risk Management. Risk Management will assess the issue and determine whether further escalation to the executive leadership team is required. The remediation procedure also stipulates that Risk Management is responsible for maintaining a register of all reported modern slavery incidents. This remediation process now forms an integral part of our incident reporting and response framework for modern slavery practices identified or suspected within our operations or supply chain.

There have been no occurrences of modern slavery alleged or reported within our operations. There have been occurrences of modern slavery relating to indirect suppliers, identified through our supplier due diligence processes. We understand the nature of the occurrences were in relation to the withholding of personal documentation and the indirect supplier carried out corrective actions to remedy the issue. We will monitor these suppliers more closely and determine whether it may be suitable to perform a follow-up audit once our audit program is finalised.

## Grievance Mechanism

The EY Ethics Hotline is available to internal and external stakeholders to report an activity that may involve unethical or illegal behaviour that is in violation of professional standards or otherwise inconsistent with our EY Global Code of Conduct. The hotline is operated by an external organisation to allow for anonymity, if preferred. All reports are investigated and responded to by EY.

During the reporting period, EY Australia did not receive any reports of modern slavery practices, such as forced labour, bonded labour, child labour or any other forms of modern slavery through the Ethics Hotline.

# Assessing the effectiveness of our approach





## Compliance Program

Modern slavery controls have now been incorporated into our Compliance Program. The purpose of the Compliance Program is to understand and evidence how we comply with legislative and regulatory obligations; registration and licensing requirements; industry codes and guidelines; and internal firm policies and procedures. The program provides support to owners of non-compliant areas and assists in implementation of risk mitigation strategies. This is overseen by EY Australia's Compliance Officer, the Risk Management Leader.

By incorporating modern slavery controls into the Compliance Program, we can effectively facilitate ongoing monitoring of the modern slavery framework and capture and address any non-compliance within our operations and supply chain. The Compliance Program requires the modern slavery framework to be reviewed on an annual basis and assesses controls such as the inclusion of modern slavery provisions in contractual agreements, supplier due diligence, remediation of Modern Slavery Incidents, as well as ongoing education and training for employees.

The first review of the modern slavery framework as part of the Compliance Program was conducted in the last quarter of FY21 and all controls were found to be compliant. The review criteria will be revisited regularly so that any new or improved controls in our evolving modern slavery framework are accurately reflected in the Program, allowing us to accurately assess the effectiveness of our approach to modern slavery.

Whilst the Compliance Program already forms part of a well-established set of controls to monitor and maintain compliance at EY Australia, we will continue to evaluate whether we can further embed modern slavery considerations into our robust management and governance structure.

# Our commitments for the future



# Update on prior commitments

In our FY20 modern slavery statement, we provided a list of forward commitments which EY Australia is dedicated to pursuing in future reporting periods. We have provided an update on these commitments below.

- Human Rights Policy**
  - ▶ Work was undertaken throughout the year to identify salient human rights issues and to establish a global position on human rights
  - ▶ The [EY Global Human Rights Statement](#) was recently approved by the Global Executive and is now available to view on the EY website
- Modern Slavery Training**
  - ▶ A targeted modern slavery training seminar has been held for Procurement staff and will be conducted annually by Risk Management
  - ▶ A modern slavery web based learning module will be rolled out to employees from Legal, Talent, Workplace Services and Brand, Marketing and Communications
- Supplier Due Diligence**
  - ▶ EY refined the Modern Slavery Supplier Diligence Questionnaire which was deployed to selected high risk suppliers during the reporting period
  - ▶ This deployment will occur on an annual basis, allowing us to track improvements in the suppliers' processes and identify any potential issues as they arise
  - ▶ We are committed to further improving our supplier due diligence process and will assess areas for additional developments in future reporting periods
- Operational Due Diligence**
  - ▶ We will place a stronger focus on due diligence activities over our offshore operations to validate our understanding of the existing control environments, and where appropriate, provide recommendations and support for improvements
- Client Acceptance**
  - ▶ EY Australia continues to encourage the integration of human rights risk considerations into our client acceptance processes
  - ▶ Following the publishing of our Human Rights Statement, focus has shifted to identifying ways in which these principles can be worked into our client acceptance process
- Drive Improvements**
  - ▶ EY has maintained an open channel of communication with suppliers identified as requiring improvements
  - ▶ Introduction of the audit program will allow us to identify the specific areas which require corrective action and will allow us to assist suppliers to strengthen their approach to managing modern slavery risks

## New commitments

As our modern slavery framework evolves, we establish new goals aimed at continually improving our approach to managing modern slavery risks. During the reporting period we identified more areas which we are committed to working on over the coming years. We will report on our progress on these commitments in our future modern slavery statements.





## **EY | Building a better working world**

EY exists to build a better working world, helping to create long-term value for clients, people and society and build trust in the capital markets.

Enabled by data and technology, diverse EY teams in over 150 countries provide trust through assurance and help clients grow, transform and operate.

Working across assurance, consulting, law, strategy, tax and transactions, EY teams ask better questions to find new answers for the complex issues facing our world today.

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