

# Modern Slavery Statement FY25

Grant Thornton is committed to working towards the eradication of modern slavery in all its forms.

We have a responsibility to respect and uphold human rights in our operations and supply chains. This responsibility includes taking action to prevent, mitigate and, where appropriate, remedy instances of modern slavery wherever it is found.

This Modern Slavery Statement is a joint statement made on behalf of Grant Thornton Australia Limited (ABN 41 127 556 389) and Grant Thornton Audit Pty Ltd (ABN 91 130 913 594), a subsidiary of Grant Thornton Australia Limited – together, Grant Thornton, and covers Grant Thornton's subsidiaries and related entities.

This Statement has been prepared in accordance with the requirements in the Modern Slavery Act 2018 (Cth) for the reporting period 1 July 2024 to 30 June 2025.

## Our purpose and commitment

We are committed to safeguarding the wellbeing of our people, clients, and communities. As part of this commitment, we have taken a decisive step to actively address and eliminate modern slavery within our operations and supply chains.

This forms the foundation of our Modern Slavery Program and reflects our obligation to uphold ethical and legal standards. This commitment is not a one-off exercise; it requires ongoing review, continuous improvement, and reaffirmation to ensure compliance and accountability.

Our 1,600+ people working in offices in Sydney, Brisbane, Cairns, Perth, Adelaide and Melbourne are at the centre of this commitment.

## This statement

This Statement outlines the actions we are taking to prevent, mitigate and remedy instances of modern slavery. It also describes our future commitment to understand and address modern slavery risks in our operations and supply chains.

It covers the steps we have taken during FY25, as well as reference to past actions to provide context for our current position. It sets out our objectives for the future as we continue to build on what we have achieved to date.

## Our structure and operations

Grant Thornton Australia Limited is an unlisted public company with wholly owned special purpose subsidiaries. All shareholders are associated investment entities of the Partners of Grant Thornton Australia. There are no outside shareholders.

We are a professional services firm providing audit, tax and advisory services to clients located primarily in Australia, but also overseas. Our services are mainly provided in Australia with support from our global member firms where our clients operate internationally. We are committed to being responsive to our clients' needs and to working with them to align our strategic and operational activities regarding upholding human rights, and to making continuous improvements to our modern slavery program as part of our clients' supply chain.

### Our services include:

- Audit
- Tax
- Private Enterprise
- Financial Advisory
- Consulting

Grant Thornton Australia Limited is a member firm of Grant Thornton International Ltd (GTIL). GTIL and the member firms are not a worldwide partnership and are each a separate legal entity.

Grant Thornton Australia has access to the expertise of fellow Grant Thornton professionals in over 135 countries. We are active on Grant Thornton Global Committees and work to influence these committees to promote continuous improvement in risk management, compliance and quality across the network.

## Our supply chain

As a professional services firm operating primarily as a people and technology business, our core activities focus on delivering accounting, advisory, and consulting services to clients. To support these services and maintain operational efficiency, we engage a range of third-party providers for products and services.

Through the use of automated supply chain mapping tools, we have identified that the majority of our direct (Tier 1) suppliers are registered and operate within Australia. However, we also engage a limited number of overseas-based suppliers, including global providers that support the Grant Thornton network.

We acknowledge that our Tier 1 suppliers may source goods and services from entities operating in other jurisdictions, which introduces additional risk factors. As part of our compliance framework, we are actively working to identify and assess these Tier 2 suppliers through structured risk reviews. This process is integral to our due diligence program and ensures alignment with our obligations under the Modern Slavery Act and our commitment to ethical and transparent business practices.

### Key areas of supply include:

#### Technology

Computer hardware, computer software, cloud services, virtual data room services, virtual document exchange services, printers, audio/visual equipment and services, mobile phones, and wide area network and internet connection.

#### Professional services

External legal, tax, auditing, marketing, professional lines insurance, consulting, technology implementation support, education and professional development services.

#### Recruitment and Labour Hire

Agencies, contractor onboarding, workforce outsourcing.

#### Facilities and Workplace Services

Premises leasing, our office building upgrades and fit outs, workspace design, office furniture and facilities, property maintenance, property insurances, and utilities.

### Operations including office supplies

Document management and storage, stationery, cleaning, security, general insurances, subscriptions, courier and postal services.

### Business travel and accommodation

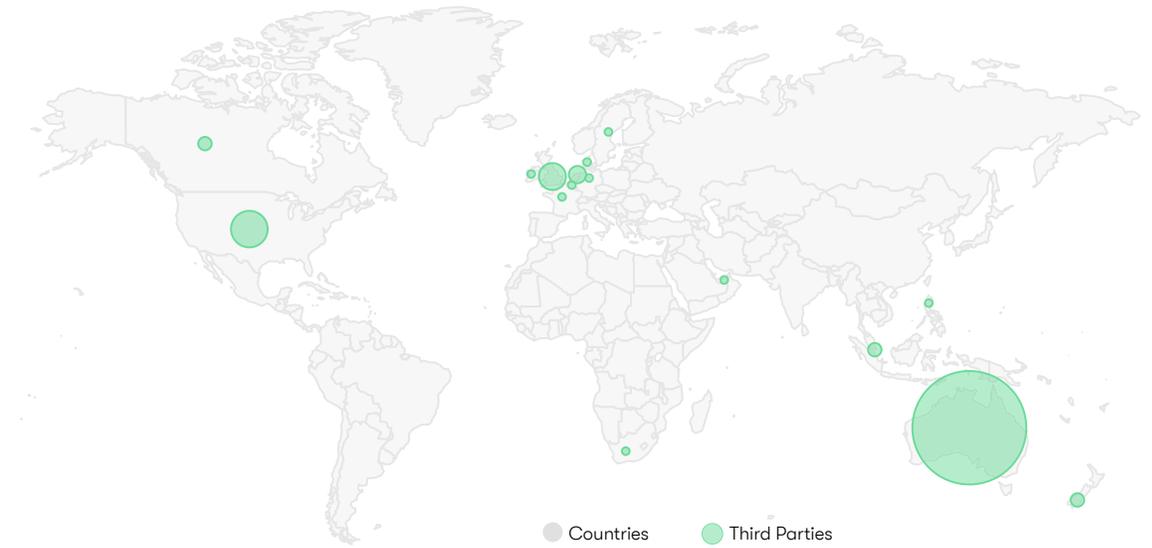
Air and ground transport and accommodation.

### Hospitality, marketing and events

Events management and in-house and external event catering.

The map below shows the location of our suppliers as at 30 June 2025.

### Supplier Business Operations<sup>1</sup>



<sup>1</sup> Number of suppliers per supplier location

## Assessment of our modern slavery risks

### Grant Thornton's Operations

Our workforce is based in Australia however we utilise other Grant Thornton member firms and third parties to provide outsourced services to us, including member firms and providers located offshore.

Our employees comprise skilled professionals delivering services from offices in Adelaide, Brisbane, Cairns, Melbourne, Perth, and Sydney. Modern slavery and broader human rights considerations are embedded within our recruitment policies, procedures, and systems. These frameworks are supported by mandatory training programs designed to equip our people with the knowledge to identify, assess, and respond to potential risks.

We initiated our Modern Slavery Program in FY20 and have continued to strengthen and mature it through regular reviews and enhancements. Our policies and procedures are updated periodically to ensure alignment with our risk management methodology and compliance obligations under the Modern Slavery Act.

Our Human Rights Policy is aligned with the UN Guiding Principles on Business and Human Rights and sets out our commitment to preventing human rights abuses within our operations. It also identifies opportunities to positively influence human rights outcomes where possible. This policy serves as the foundation for our Modern Slavery Program and establishes the principles upon which our framework for identifying, mitigating, and preventing modern slavery risks is built.



Policies that form the basis of our efforts to create a workplace which is safe, inclusive, fair, and rejects human rights abuses; and that promotes our social procurement program include:

- Human Rights Policy
- Code of Conduct
- Supplier Code of Conduct
- Equal Employment Opportunity Policy
- Gifts, Benefits and Hospitality Policy
- Anti-Bribery and Corruption Policy
- Grievance and Disputes Handling Policy (for employees)
- Talent Sourcing and Selection Policy
- Whistleblower Policy
- Workplace Health and Safety Policy
- Social Procurement Statement

Our governance framework ensures that modern slavery risk is systematically considered during every policy review and the development of new policies. This includes embedding clear provisions that promote and facilitate the reporting of suspected or actual instances of modern slavery by both internal and external stakeholders. Reporting channels are designed to be accessible and confidential, enabling individuals—whether within the firm or outside—to raise concerns directly with trained personnel who have the authority and responsibility to act.

As a professional services provider, our operations inherently present a low risk of modern slavery. Based on this and the controls we have implemented, we have assessed our residual risk rating for modern slavery within our operations as low. However, we recognise that risk is dynamic and cannot be approached with complacency. The modern slavery landscape continues to evolve, requiring vigilance and adaptability. We remain committed to enhancing our risk assessment methodologies, improving detection capabilities, and strengthening remediation strategies as needed.

To maintain effectiveness, we will continue to review and reassess our residual risk rating and ensure that our controls—including policies, procedures, and reporting protocols—are operating as intended.

## Grant Thornton's supply chain

### Supplier Code of Conduct and Due Diligence

#### 1. Supplier Code of Conduct

Our Supplier Code of Conduct—aligned with our Human Rights Policy and Code of Conduct—mandates compliance with all applicable modern slavery and human rights standards. Key requirements include:

- adherence to international conventions (e.g., UN Guiding Principles, ILO fundamental rights) and all relevant anti-slavery laws
- commitment to internal policies, due diligence, transparent grievance mechanisms, and nondiscrimination
- non-retaliation for individuals reporting concerns, and obligation to notify us of suspected or actual breaches.

Suppliers are required to formally acknowledge and commit to the Code alongside their completion of our Modern Slavery questionnaire. Failure to comply or respond is escalated through our supplier risk assessment framework and may result in exclusion from onboarding.

#### 2. Supply Chain Risk Identification

Our Modern Slavery Program initially focused on Tier 1 suppliers. This desktop review established individual risk profiles. Informed by global trends and regulatory expectations, we are now extending assessments to Tier 2 suppliers to ensure deeper visibility and mitigation across our supply chain.

#### 3. Automated Questionnaires & Third-Party Platforms

We leverage Ethixbase360 to distribute and manage modern slavery questionnaires to both new and existing suppliers. Ethixbase tools—developed with input from Norton Rose Fulbright—enable dynamic, risk-based screening, iterative risk scoring, and centralized follow-up.

#### 4. Risk Assessment & Remediation

Using responses gathered from our Code of Conduct and questionnaires, each supplier is rated based on modern slavery risk. For high-risk suppliers, we undertake targeted due diligence.

Non-compliance triggers a standardised remediation process aligned with leading practice:

- collaboration with the supplier to develop a time-bound corrective action plan
- if unresolved, relationship reassessment—including supplier suspension or termination.

#### 5. Continuous Improvement & Regulatory Alignment

We carry out regular reviews of our Supplier Code and diligence methodologies to ensure alignment with emerging legislative frameworks—including the Australian Modern Slavery Act, as well as guidance from the Attorney-General's Department.

Benchmarking against peer best practices—particularly in areas like grievance mechanisms, multi-tier visibility, and responsiveness to global due diligence laws—drives continuous enhancement of our program.



## Modern Slavery Risk Rating

Our modern slavery risk assessment rates each supplier as a high, moderate, or low risk of modern slavery using the following criteria:

- product or service supplied
- supplier industry
- jurisdiction (country of registration)
- countries where the supplier has operations
- workforce and the possibility/probability that the workforce contains vulnerable workers
- supplier commitment to human rights
- suppliers conducting their own human rights impact assessment
- supplier contracts include provisions addressing human rights and the prevention of prohibited practices, such as modern slavery, bribery, and corruption
- supplier committing to comply with our Supplier Code of Conduct.

We apply a rigorous, risk-based approach to assessment, evaluating the degree of modern slavery risk associated with each supplier. This includes reviewing any known history of non-compliance with modern slavery legislation or evidence of human rights violations.

Suppliers identified as medium to high risk are subject to enhanced due diligence through Ethixbase's advanced screening and monitoring solution. This platform continuously evaluates suppliers against global risk databases and media sources, generating alerts for potential issues. All alerts are reviewed by our Compliance team, and remediation actions are implemented promptly and in line with our governance protocols.

Based on our ongoing risk assessment activities and data collected since the inception of our Modern Slavery Program, we have identified specific supplier categories that present inherently higher modern slavery risk. These insights inform our targeted engagement and mitigation strategies, ensuring compliance and accountability across our supply chain.

## Technology suppliers

Technology suppliers covers hardware supply including laptops, servers, mobile phones, coding, virtual services and supply involving cloud services, particularly those product and service types where suppliers may utilise a high proportion of outsourced workers, or where product inputs may be sourced from industries or countries with a known risk of modern slavery. These suppliers include those who handle (or outsource) the disposal of e-waste including computers, monitors and printers.

### Key risk areas for technology suppliers include:

- product – sourcing manufacturing inputs and raw materials and product disposal process
- industries – certain industries carry an inherently higher risk of modern slavery
- countries of operation – whether a country is known to have a higher risk for modern slavery (particularly when combined with the risk assessment result for product and industry)
- workers – prevalence of the use of outsourced workers.

## Recruitment, Outsourcing and Labour Hire

Agencies, contractor onboarding, workforce outsourcing and labour-hire providers present heightened modern slavery risks due to the potential for exploitative practices such as underpayment, debt bondage, and lack of transparency in employment conditions.

### Key risk areas for Recruitment and Labour Hire include:

- industry – exhibits multiple risk factors including excessive worker debt, withheld documents, underpayment and unmonitored onboarding processes
- countries of operation – where outsourcing offshore or using offshore based labour hire
- workforce – the possibility/probability that the workforce might include vulnerable workers or those in precarious employment
- supplier commitment to Human Rights – diffused accountability where there is shared responsibility between outsourced service and labour hire providers can reduce visibility and weaken control over workers conditions.

## Facilities and Workplace Services, Operations, and Hospitality, Marketing and Events suppliers

Facilities related suppliers include office fit out and furniture where the manufactured product contains product and raw materials from countries with a higher risk of modern slavery.

Operations and Hospitality suppliers including cleaning, security, courier and catering and accommodation services, especially where the services might be procured indirectly, and the workforce generally includes a higher proportion of migrant workers and those paid at or close to the minimum wage (vulnerable workers).

### Key risk areas for Facilities and Workplace related include:

- product – sourcing manufacturing inputs and raw materials and product disposal process
- countries of operation – manufactured goods and raw materials from countries with a higher risk of modern slavery.

### Key risk areas for Operations, Hospitality, Marketing and Events include:

- industry – certain industries carry an inherently higher risk of modern slavery
- workers – is any part of the workforce likely to include vulnerable workers and where, due to the indirect nature of supply, there is less transparency of the workforce.



## Actions to assess and address modern slavery risks

### Compliance Plan and Supporting Materials

- We continue to evolve our Modern Slavery Compliance Plan and maintain supporting materials, including policies, training modules, and reporting frameworks.

### Training and Awareness

- Mandatory modern slavery training is provided to all employees at induction and periodically during employment.
- Training includes dedicated modules and integration into broader compliance programs. Completion is tracked via our Learning Management System, and non-compliant personnel have restricted system access until completion.
- Targeted training for procurement teams and those conducting Supplier Risk Assessments ensures awareness of supply chain risks.

### Policy and Code of Conduct Reviews

- Our Code of Conduct and Supplier Code of Conduct are reviewed annually and updated as necessary. Employees attest to compliance through our annual declarations program.

### Supplier Risk Profiling

- We maintain and update our supplier list, applying risk criteria to create profiles and identify suppliers requiring enhanced due diligence.

### Third-Party Risk Assessment

- We partner with Ethixbase to facilitate supplier engagement, apply risk assessment methodologies, and leverage external research databases for comprehensive supply chain insights.

### Supplier Commitments

- All suppliers must commit to our Supplier Code of Conduct and comply with our Anti-Bribery and Anti-Slavery contract addendum, which prohibits bribery, corruption, and modern slavery practices.



### In FY25 we continued to build on those foundations:

We:

- continue to strongly promote our 'Speak Up' program to encourage our people, and others including our suppliers and their employees, to stand up and speak out if they identify any contraventions of our Code of Conduct, including any instances of actual or suspected modern slavery in our operations or supply chains. Information about our Speak Up program is incorporated into all of our policies and training. Various reporting mechanisms, including anonymous whistleblower reporting, are available to allow people, both internally and externally, to make reports confidentially and anonymously in a safe environment.
- use our Speak Up program to remind people about our prohibition on retaliation against people who have, or who are suspected of having made a report about suspected instances of modern slavery or human rights abuses.

- continue to progress our desktop review of Tier 2 suppliers with a focus on those who operate in high-risk industries or countries, or where there is a higher risk of modern slavery and human rights breaches associated with a particular product or service they provide to our direct (Tier 1) suppliers.
- released refreshed and new internal training on Modern Slavery and our Code of Conduct.
- reviewed our response rate for suppliers completing our Modern Slavery Questionnaire and considered additional procedures to prompt timely response where required.
- evaluated third party arrangements not already captured by our Supplier Risk Assessments for modern slavery risk and included stronger review triggers into our third party arrangement take on processes.
- enhanced our remediation measures by preparing and offering additional training and other supporting materials to suppliers who we identify via their Modern Slavery Questionnaire responses and our due diligence monitoring as having opportunities for improvement in their Modern Slavery/human rights program.
- re-visited our recruitment and employment practices to ensure our modern slavery risk identification and prevention measures are working as intended.
- drafted new contract templates for the engagement of outsourced services and outsourced contractor resources (labour hire) that incorporate clauses relating to prohibited practices including Modern Slavery.
- prepared our Alternative Resourcing Framework which addresses recruitment and engagement of outsourced providers, both onshore and offshore, and which specifically addresses Modern Slavery risks.

### Identifying and mitigating instances of modern slavery

As at the date of this statement we have identified no instances of modern slavery in our operations or supply chain and so have not been required to take steps to mitigate risk or undertake remedial action.

Through our suppliers due diligence activities we have identified a small number of instances where suppliers who are not required to comply with the Modern Slavery Act 2018 have scope for improvement in their modern slavery and human rights controls. Where this occurs, we can provide them with information to support them in their journey to improve their position.

## Assessing the effectiveness of our actions

We've built a strong foundation for our Modern Slavery Program—now our focus is on making sure it works. Just like our enterprise risk and compliance frameworks, we're applying rigorous processes to test effectiveness and drive improvement.

Our review cycle tracks outputs from key reporting channels, including our Speak Up program, and uses this data to refine and strengthen our approach. We monitor training participation and feedback to ensure our modules are practical and impactful. Training completion rates are tracked through our Learning Management System, and non-compliance triggers immediate follow-up.

Policies—including our Code of Conduct and Supplier Code of Conduct—are reviewed annually to reflect legislative changes, global standards, and best practice benchmarks. We also evaluate supplier risk criteria to confirm ratings are consistent and relevant, ensuring our risk model stays sharp and fit for purpose.

## Consultation

We regularly liaise with teams in the business to gain an understanding of particular areas in our operations and supply chain which might require deeper investigation. By working closely with teams that play a critical role in our operations and supply chain, we ensure our modern slavery program is not only well-designed but actively embedded and continuously improved.

This Statement was prepared by the Grant Thornton national Quality and Excellence team. Parties consulted throughout the reporting period included the People and Culture, Digital, Procurement, and Finance teams; Office Support teams; and other business units. These discussions helped us to understand and map our supply chains, assess our operations for possible modern slavery risks, and prepare this Statement. The Statement has been reviewed by the Enterprise Risk Committee (a Board sub-committee) before submission to the Board of Grant Thornton Australia Limited for review and approval. Our Statement is submitted for publishing on the Modern Slavery Statement Register no later than six months post financial year-end.



## Forward commitments

We are committed to the continuous improvement of our modern slavery program.

During the next reporting period we plan to:

- conduct targeted reviews of high-risk suppliers, including direct engagement with workers to verify employment conditions
- promote our Speak Up program to outsourced contractor resources through the onboarding process to ensure workers understand they have a voice and can raise concerns directly and anonymously (if they so wish) with the Grant Thornton Australia Compliance Team
- continue to examine ways to apply technology to certain processes, including threshold supply chain risk assessments and supplier contract reviews
- deploy new functionality in the Ethixbase platform to better monitor compliance and flag emerging risks in real time
- continually analyse data to look for trends and systemic issues allowing us to identify and implement controls to improve our reporting capability and thereby better manage modern slavery risk in our supply chain, including more informed supplier selection
- create opportunities to collaborate with others, including our suppliers, clients, and those active in the field of human rights
- revise our policies and draft new policy where necessary, so we continue to reflect our commitment to combatting modern slavery in all its forms
- further integrate modern slavery risk indicators and controls into our Compliance reporting dashboards
- develop advanced training for senior leaders and procurement specialists focused on identifying complex risk indicators.

Signed by



Said Jahani  
Chief Executive Officer / Director  
Grant Thornton Australia Limited

12 December 2025

As authorised signatory on behalf of Grant Thornton Australia Limited.

This statement has been approved by the Board of Grant Thornton Australia Limited ABN 41 127 556 389 on 12 December 2025 and applies to Grant Thornton Australia Limited and its subsidiaries and related entities.

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### The terms we use

Language is a powerful tool. No single set of definitions can describe how every person experiences life, or how they define themselves. We acknowledge the diversity of self-identity and intersectionality, particularly within gender, culture, sexual orientation, disability and First Nations language groups. It is always our intention to be inclusive and respectful and we acknowledge that not everyone will identify with the terms we have chosen.



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