



PwC Australia's

Joint Modern Slavery Statement

FY2022



This statement is a Joint Modern Slavery Statement made by PwC Australia and associated reporting entities in accordance with s16 of the Modern Slavery Act 2018 (Cth).





Acknowledgement of Country

We acknowledge and pay our respects to Aboriginal and Torres Strait Islander peoples as the First Peoples of Australia whose ancestral lands and waters we work and live on throughout Australia. We honour the wisdom of, and pay respect to, Elders past, present and future.

We also acknowledge the historical lived experience of First Nations Peoples who have endured injustices and various forms of slavery in this country. This part of our shared history has impacted generations of First Nations Peoples and remains an area of unfinished business, and presents an opportunity for our nation to undertake a process of truth telling.

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Reporting entities

PricewaterhouseCoopers (ABN 52 780 433 757) has made this statement according to sections 14 and 16 of the *Modern Slavery Act 2018* (Cth) (the **Modern Slavery Act**). The statement applies to the following PwC reporting entities (**reporting entities**) each with a Registered Office of One International Towers Sydney, Level 17, 100 Barangaroo Avenue, Barangaroo NSW 2000 Australia:

1. PricewaterhouseCoopers (ABN 52 780 433 757)
2. PricewaterhouseCoopers Services Trust (ABN 52 864 604 756) – its trustee is PricewaterhouseCoopers Services Pty Ltd (ABN 59 082 982 554)
3. PricewaterhouseCoopers Securities Ltd (ABN 54 003 311 617)
4. PricewaterhouseCoopers ASEANZ Consulting Pty Limited (ABN 77 606 603 436)
5. PricewaterhouseCoopers Consulting (Australia) Pty Limited (ABN 20 607 773 295)

A reference to **PwC** or **we** or **us** or **our** is a reference to the above reporting entities collectively or individually as the context requires. A brief description of the relationship between these entities, some of their controlled entities, and the PwC network, is set out in the section Our structure, operations and supply chains, on page 6.

For any references to an entity having 'control' of another entity, the term 'control' has the meaning given in the *Modern Slavery Act*.

A message from PwC Australia's CEO on behalf of the PwC reporting entities



At PwC we encourage our people to think deeply about solutions to societal issues that are important to our clients and our communities. We are committed to delivering strong environmental, social and governance (ESG) performance as a responsible business. A key component of our approach is our commitment to respecting human rights and working to identify and eliminate modern slavery risks and practices.

We know that modern slavery is a serious and complex global problem. It's a problem that is best addressed when we work collectively with a broad range of stakeholders.

That's why at PwC Australia, our modern slavery response is more than just about compliance; it's also an opportunity to strengthen our role as a responsible business.

I am pleased to introduce our FY22 Modern Slavery Statement that outlines how PwC Australia and its reporting entities identified and addressed modern slavery risks in the financial year ended 30 June 2022 (FY22).

In our Australian Operations, we made improvements across several functional areas. We revised and updated our human rights governance arrangements, including a review and update of our human rights statement. We continued to map our tier-two suppliers (suppliers to our suppliers) operating in modern slavery hotspots.

We reviewed our policies to identify those that impact internationally recognised human rights. In addition, we updated our supplier screening procedures, strengthened our training programs, bolstered our monitoring and reporting, and enhanced our grievance and remediation process

“ As a firm whose purpose is to build trust in society and solve important problems, we know that problems are better solved together.”

Looking ahead, we will continue to build on the progress we have made over the past three years, focusing on the areas where we can have the greatest impact. We will continue to pursue improvements in our approach and share our achievements, knowledge, insights and experience with others, to encourage collaboration in tackling modern slavery.

CEO • Country Senior Partner • Member of PwC Australia's Executive Board
Signing on behalf of all reporting entities

PricewaterhouseCoopers
(ABN 52 780 433 757)

This Joint Modern Slavery Statement has been approved by the Executive Board and Governance Board of the Australian partnership of PricewaterhouseCoopers and the Boards of PricewaterhouseCoopers Services Pty Ltd (the trustee for PricewaterhouseCoopers Services Trust), PricewaterhouseCoopers Securities Ltd, PricewaterhouseCoopers ASEANZ Consulting Pty Limited and PricewaterhouseCoopers Consulting (Australia) Pty Limited.



Our structure, operations and supply chains

At PwC, our purpose is to build trust in society and solve important problems. In an increasingly complex world, we work with businesses, government and the community to build trust and deliver sustained outcomes. Our purpose is what drives our community of solvers. Passionate and diverse people who come together in unexpected ways, with human-led, tech-powered ideas and capabilities to untangle and solve the world's most important problems. We are a team of people who deliver integrated solutions across professional services, including audit, assurance, consulting- technology and strategy transformation and tax services to more than 5,000 clients.

Our culture is grounded in a set of values that support and celebrate doing the right thing. Our values are part of our day-to-day conversations and the heartbeat of our business. They guide our decisions and determine our success.

It all adds up to [The New Equation](#), PwC's global network strategy.



Act with integrity



Make a difference



Care



Work together



Reimagine the possible

For more information about PwC Australia, our operations and our FY22 performance across Environment, Social and Governance (ESG) aspects, see our firmwide [FY22 Transparency Report](#). Our report is based on the World Economic Forum's Stakeholder Capitalism Framework.

Global PwC network

We are part of the global PwC network. This network, which operates across 152 countries, consists of professional services firms that are separate legal entities operating under the PwC brand. The PwC network is not a global partnership, a single firm, or a multinational corporation. All PwC network firms are members of PricewaterhouseCoopers International Limited (**PwCIL**) and must comply with global network regulations and certain common policies, including the PwC network Code and Third Party Code of Conduct. For more information about the PwC network, see www.pwc.com/structure and our Global Annual Review.



How and where we operate

The Australian partnership of PricewaterhouseCoopers (the **Partnership**) is the controlling entity of a number of entities. These include the PricewaterhouseCoopers Services Trust (**PwC Services**), a trust established in Australia and its trustee, PricewaterhouseCoopers Services Pty Ltd, a company incorporated in Australia and PricewaterhouseCoopers Securities Ltd (**PwC Securities**), a public company incorporated in Australia (together **PwC Australia**).

The Partnership is also the ultimate beneficial owner of a majority of the shares in PricewaterhouseCoopers ASEANZ Consulting Pty Limited (**PwC ASEANZ**), a holding company incorporated in Australia. PwC ASEANZ acquired the Australian consulting business from the Partnership, the local consulting business from the existing PwC network firm in New Zealand, and the regional holding company of the PwC network consulting businesses in a number of other countries in South-East Asia. The significant majority of the Australian consulting business is operated by PricewaterhouseCoopers Consulting (Australia) Pty Limited (**PwC Australia Consulting**), a company incorporated in Australia, which is a wholly owned subsidiary of PwC ASEANZ.

PwC Australia's operations include a workforce of more than 10,000 partners and employees in Australia, with offices in Adelaide, Brisbane, Canberra, Greater Western Sydney, Melbourne, Newcastle, Perth and Sydney. Approximately 2,700 of those partners and employees are consulting professionals who, along with certain resources (including office space and other office related services), are made available to PwC Australia Consulting by the Partnership under a professional and office services arrangement so that PwC Australia Consulting can operate its business. PwC Australia's operations include a number of enabling functions, such as but not limited to central facilities, finance, technology, human resources, procurement and social impact teams, who support PwC Australia's Australian businesses as well as the Australian Operations of PwC ASEANZ (including PwC Australia Consulting) through that arrangement.

The Partnership has a financial interest in, and control of, the PwC network firm in Papua New Guinea (**PwC PNG**). As a member of the PwC network, PwC PNG is required to comply with network regulations and policies. PwC PNG is a separate legal entity with its own local management team.

The Partnership also holds non-controlling interests in other entities based in Australia and overseas, including in the Philippines and India. The overseas entities, co-owned with other PwC network firms, include entities that are intended to provide regional governance, services and/or other assistance to PwC network firms. In Australia, the Partnership also holds a non-controlling interest in PricewaterhouseCoopers Indigenous Consulting Pty Limited, a majority Indigenous owned, led and staffed consulting firm.

PwC ASEANZ's operations outside of Australia include a workforce of approximately 1,600 partners and staff directly employed by PwC ASEANZ's offshore controlled entities across Indonesia, Malaysia, Myanmar, New Zealand, Philippines, Singapore, Thailand and Vietnam. PwC ASEANZ's offshore controlled entities are supported by the separately owned PwC network firms in Indonesia, Malaysia, New Zealand, Philippines, Singapore, Thailand and Vietnam (each an **Offshore Local Firm**) through similar arrangements for the provision of services and access to resources as are described above for PwC Australia Consulting. In addition to being subject to PwC network regulations and policies, PwC ASEANZ's offshore controlled entities are also required to operate in accordance with the laws of the countries in which they are based as well as the policies and processes of their Offshore Local Firms.

For the purposes of this Statement, **Australian Operations** means, together, the operations of PwC Australia and the Partnership's other controlled entities in Australia, and the Australian operations of PwC ASEANZ (including PwC Australia Consulting). **PwC ASEANZ's offshore controlled entities** means entities controlled by PwC ASEANZ that operate outside of Australia including in Indonesia, Malaysia, Myanmar, New Zealand, Philippines, Singapore, Thailand and Vietnam. **PwC's offshore controlled entities** means entities controlled by PwC Australia and PwC ASEANZ, respectively, that operate outside of Australia.





Goods and services we buy

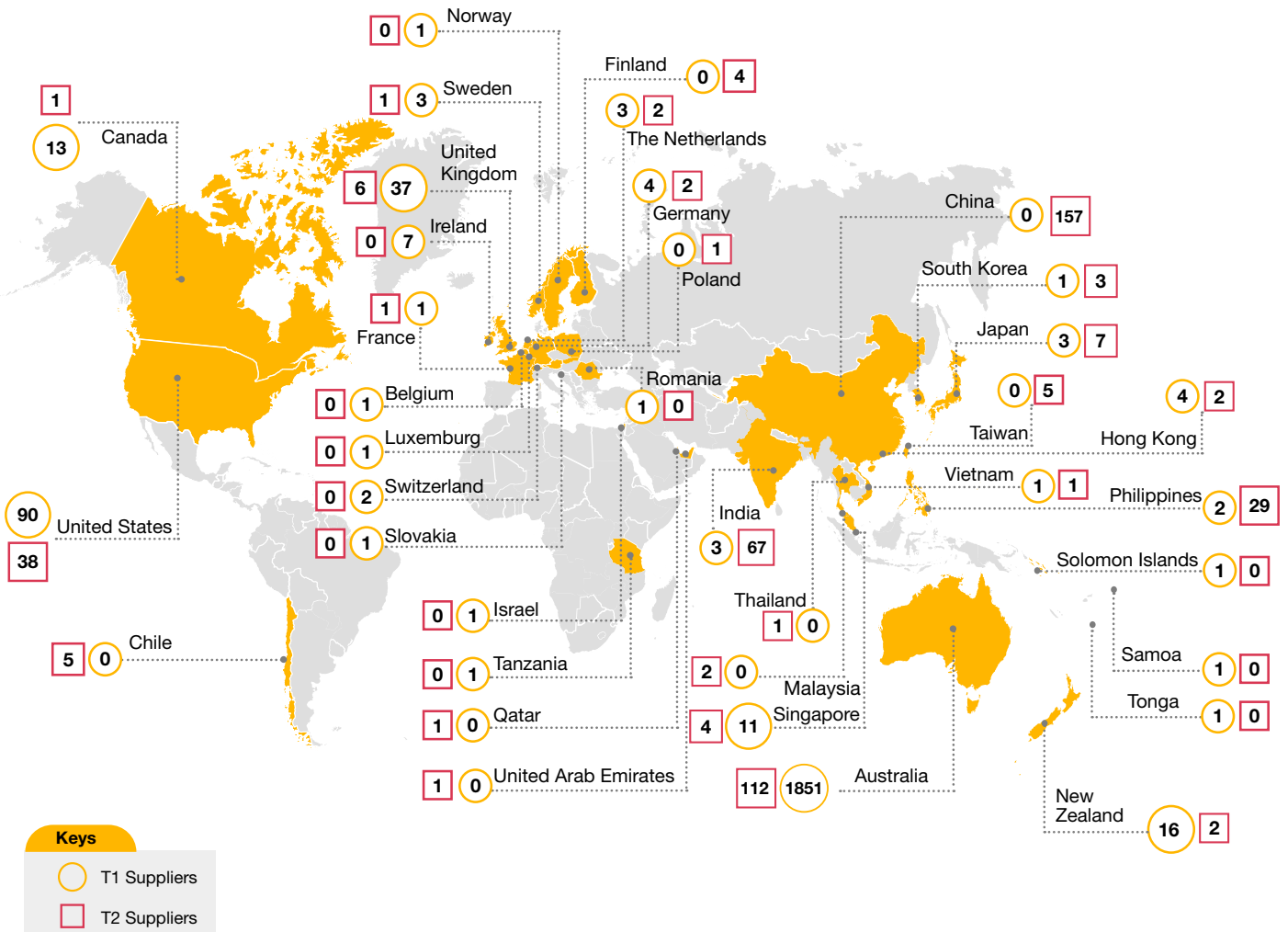
In FY22, our Australian Operations sourced goods and services from more than 2,000 tier-one suppliers. Approximately 90% of these suppliers operate in Australia. We also purchased from overseas suppliers, mainly in the United States and the United Kingdom, and we also engage other PwC network firms. PwC's offshore controlled entities sourced goods and services from a range of suppliers, including the Offshore Local Firms and other PwC network firms.

What we buy:

- Office facilities management, including catering
- Professional services
- Information and research services
- Utilities
- Marketing and events
- Office services and products
- Technology services and products
- Travel services and products

88%
of total spend in our Australian Operations, supports Australian based suppliers

The location of tier-one, and some tier-two* suppliers, to our Australian Operations in FY22



> Excludes other PwC network firms who are suppliers to our Australian Operations
 * Includes tier-two suppliers we identified in our Australian Operations supply chain during FY22, but does not reflect the total number of tier-two suppliers.
 We acknowledge that Australian based suppliers may source from overseas



Locations with more than 10 tier-one suppliers

Australia	
T1 Suppliers	1851
% Total spend	88%
T2 Suppliers*	112
Business Expenses	
Facilities	
Financial Services	
Human Capital Services	
Information Services	
Information Technology	
Marketing & Events	
Office Services	
Professional Services	
Staff Expenses	
Travel	
Modern slavery prevalence ^	0.6

Canada	
T1 Suppliers	13
% Total spend	<1%
T2 Suppliers*	1
Business Expenses	
Human Capital Services	
Information Services	
Information Technology	
Marketing & Events	
Professional Services	
Modern slavery prevalence ^	0.5

New Zealand	
T1 Suppliers	16
% Total spend	<1%
T2 Suppliers*	2
Business Expenses	
Facilities	
Financial Services	
Human Capital Services	
Information Technology	
Professional Services	
Modern slavery prevalence ^	0.6

Singapore	
T1 Suppliers	11
% Total spend	<1%
T2 Suppliers*	4
Business Expenses	
Financial Services	
Human Capital Services	
Information Services	
Professional Services	
Modern slavery prevalence ^	3.4

United Kingdom	
T1 Suppliers	37
% Total spend	<1%
T2 Suppliers*	6
Business Expenses	
Financial Services	
Human Capital Services	
Information Services	
Information Technology	
Marketing & Events	
Professional Services	
Modern slavery prevalence ^	2.1

United States	
T1 Suppliers	90
% Total spend	3%
T2 Suppliers*	38
Business Expenses	
Human Capital Services	
Information Services	
Information Technology	
Marketing & Events	
Professional Services	
Travel	
Modern slavery prevalence ^	1.3

* Includes tier-two suppliers we identified in our Australian Operations supply chain during FY22, but does not reflect the total number of tier-two suppliers.

^ Prevalence of modern slavery is based on 2018 Global Slavery Index data. (https://downloads.globalslaveryindex.org/ephemeral/GSI-2018_FNL_190828_CO_DIGITAL_P-1662962089.pdf#page=190)

Towards a sustainable supply chain

The unsettled global landscape means procurement and supplier management are more complex. We remain committed to meaningful actions to ensure a more ethical, resilient and sustainable supply chain.

We continue to work collaboratively with our suppliers to:

- monitor, identify and address modern slavery risks
- establish solid sustainability goals in our procurement processes
- encourage open and transparent communication with our tier-one suppliers, and work with them as they set their sustainability goals
- improve supply chain visibility and transparency of our tier-two suppliers and beyond
- look for opportunities for supplier diversification and local sourcing options
- continue to implement resilience strategies and compliance processes



"Working together with our suppliers is fundamental to how we address the modern slavery risks to people involved in the supply chains of our Australian Operations. We are building strong and transparent relationships with our suppliers, with a focus on key suppliers operating in modern slavery risk hot spots, and we'll continue to collaborate to improve the way we both tackle modern slavery."

Anu Srinivasan, PwC Australia's Head of Procurement



Our approach

We have prepared this joint statement on behalf of PwC Australia and PwC ASEANZ's offshore controlled entities (as outlined on page 6) for the financial year ending 30 June 2022 in accordance with the requirements of the Modern Slavery Act 2018 (Cth). We apply the Act's definition of modern slavery which is serious exploitation that occurs in situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery can include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- deceptive recruitment for labour services
- forced marriage, and
- the worst forms of child labour

This statement was prepared by our Human Rights Working Group and assessed by a team at PwC Australia with experience in the review of modern slavery statements for our clients, for the purposes of:

- confirming that supporting evidence was available to substantiate the statements made within the Modern Slavery Statement and that based on the evidence provided those statements are complete and accurate with, and
- confirming that the Modern Slavery Statement has addressed the elements required under the Modern Slavery Act 2018 (Cth) and good practice guidance issued by the Department of Home Affairs.

Our modern slavery response is integrated into our broader work on human rights and we welcome feedback on our statement at socialimpact@au.pwc.com.

Actions Framework

Since our first Modern Slavery Statement in FY20, we have been developing and implementing an actions framework for assessing and addressing modern slavery risks in our Australian Operations.

Our actions framework comprises six key factors: governance, risk assessment, due diligence, grievance and remediation, training, and reporting and monitoring. We have also made this framework available to PwC's offshore controlled entities and encouraged them to adopt it in their operations and supply chains. Over the last three years we have monitored the progress of our framework and modified our approach as necessary.



Actions framework to address PwC Australia's modern slavery risks over the past three years

FY2022:

Continue to embed human rights considerations into all new and existing policies.

Assess the human rights focus of our People and Ethical Conduct Panel.

FY2021:

Renew the Human Rights Group to review existing and new policies and embed human rights and modern slavery considerations where possible.

FY2020:

Leverage existing policies, processes and key responsibilities, and implement new ones as needed, to communicate commitment to staff, suppliers and clients.

Governance

- Policy
- Assigned responsibilities
- Communication of governance arrangements

Risk Assessment

- Deeper dive risk assessment
- Risk validation
- Stakeholder engagement

FY2022:

Continue to map our tier-two suppliers in hot spot categories to enhance our supply chain risk assessment.

We will continue to support PwC's offshore controlled entities with their supplier risk identification and assessment activities.

FY2021:

Continue to map operations and tier-one suppliers, and begin mapping tier-two suppliers in hotspot categories in our supply chains to identify and consider modern slavery risks.

FY2020:

Map operations and tier-one suppliers in supply chains against relevant tools and data points to identify and consider modern slavery risks.

FY2022:

Identify opportunities to improve and strengthen the talent acquisition process for our contingent workers.

Narrow the focus of our approach on supply chain due diligence and risk to those suppliers in modern slavery risk hot spots.

Continue to embed our responsible supply terms and conditions in new supplier contracts and Purchase Orders.

FY2021:

Implement a supply base management system to capture data from suppliers and identity and assess modern slavery and broader human rights risks in our supply chain.

FY2020:

Screen applicable operations and supply chains and implement protections to address modern slavery risks.

Embedding: Due Diligence

- Supplier requirements
- Engage supplier and set standards
- Audit strategy and protocols

FY2022:

Continue to embed human rights considerations into PwC Australia's National Incident Response and Business Continuity Plan.

Launch a new Speak Up campaign to encourage our people to confidentially raise their concerns about ethical conduct.

FY2021:

Collaborate with the National Incident Response Team in an 'escalation, investigation and response' simulation of a modern slavery incident to identify gaps and opportunities.

FY2020:

Review escalation, investigation and response plans to ensure allegations or actual incidents of modern slavery would be appropriately triaged and managed.

Embedding: Grievance & Remediation

- Grievance mechanisms
- Remediation processes
- Communication to stakeholders

FY2022:

Continue to enhance Modern Slavery Awareness training for our Australian Operations to equip our people to identify human right risks connected with the work they perform and the third parties they engage.

FY2021:

Design and roll out Modern Slavery Awareness training to our people to aid their understanding and identification of modern slavery risks and how to address those risks.

FY2020:

Train central procurement stakeholders to understand modern slavery risks as well as their role and responsibilities in managing such risks.

Embedding: Training

- Employee training
- Supplier staff training

FY2022:

Review and update our human rights risk analysis to improve how we manage our human rights risks.

Improve the scope of our Modern Slavery in Supply Chain Risk dashboard and share it with our offshore controlled entities.

FY2021:

Engage in ongoing consultation with stakeholders. Refresh PwC Australia's Human Rights policy to more proactively manage our modern slavery, and human rights, risks.

FY2020:

Review reporting mechanisms to assist management in evaluating progress against commitments and invest in areas for improvement.

Monitoring and Reporting

- Evaluation of existing KPIs
- New Internal reporting frameworks
- External reporting



We know that delivering meaningful and sustainable solutions to modern slavery requires continual learning and improvement. We have therefore implemented a five-year strategic plan to support our actions framework based on five key pillars:

Governance	Stakeholders
1. Policies	3. Our people
2. Processes	4. Our suppliers
	5. Our clients

Our forward-looking plan provides flexibility to make informed choices about how we continue to identify, assess and remediate our modern slavery risks.

This new plan is based on existing PwC policies and processes, as well as relevant laws and guidance including the Modern Slavery Act 2018 (Cth) and the UN Global Compact’s [A Guide for Integrating Human Rights into Business Management](#).

Our actions

In FY22, we implemented various actions to identify and address modern slavery risks in our Australian Operations and PwC's offshore controlled entities. This section of our statement outlines the steps we have taken to proactively embed modern slavery protections within our policies and processes, and maintain a comprehensive, relevant and effective risk framework.

1. Governance

Human Rights Group (HRG)

The HRG provides perspectives and strategic support to identify opportunities to address modern slavery and broader human rights risks in our Australian Operations and supply chains. It includes senior representation from key functions responsible for respecting, protecting and remedying human rights at PwC: Social Impact, People & Culture, Procurement, Risk Operations and Diversity, Inclusion and Wellbeing. The group held four meetings in FY22 and discussed among other things, this statement, PwC Australia’s First Nations client acceptance process, modern slavery risks and areas of focus.

PwC Australia continues to monitor developments in human rights and modern slavery policy around the globe. We welcome the current review of the Modern Slavery Act 2018 (Cth) and look forward to participating in public consultations.





Our policies

‘Doing the right thing’ is fundamental to maintaining the trust that our people, clients, suppliers and communities place in us. It includes respecting and upholding the human rights of our people and those we come into contact with. The key policies relevant to modern slavery are described below.

PwC network’s global codes and related policies

We and our offshore controlled entities have implemented the Global Code of Conduct and agreed to adopt the Global TPCOC. Both codes include specific references to OECD Guidelines for Multinational Enterprises. These guidelines provide non-binding principles and standards for responsible business conduct when operating globally and a valuable framework for setting applicable compliance requirements and standards. Even though the PwC network consists of firms that are separate legal entities that do not form a multinational corporation or enterprise, our network standards and policies are informed by and meet the OECD Guidelines’ goals and objectives.

Policy	Overview and relevance to modern slavery	Implementation
PwC Global Code of Conduct (Code)	The Code underpins the expectation that we all behave in a manner consistent with our Purpose and Values . We expect all our people to comply with the letter and spirit of the Code. Knowing, understanding and living the Code is fundamental to who we are and what we stand for as PwC professionals. Whether working with our colleagues or others, the Code holds us accountable to our values and ethical responsibilities.	A ‘Living the Code’ training module is embedded in our onboarding process for new starters in our Australian Operations. It is also part of firmwide annual mandatory training and an annual compliance confirmation. Our people are responsible for their behaviour and breaches of the Code may result in disciplinary action, including termination of employment. The Code is publicly available on our website and through our internal policies site.
PwC Global Third Party Code of Conduct (TPCOC)	The TPCOC requires our suppliers and subcontractors to meet the same standard of behaviour we expect of ourselves. Our TPCOC expressly forbids any involvement in modern slavery: Third Parties shall not engage in or support human trafficking or modern slavery, including forced, bonded or involuntary labour.	We require suppliers and subcontractors to comply with the TPCOC as part of their contract with us. We also communicate our expectations about TPCOC compliance to suppliers in writing from time to time, and via our website. If we find a breach of the TPCOC, we immediately escalate it via our Ethics & Conduct, Procurement and Business Risk teams for investigation and remediation.

In addition to these global policies, we also have local policies that directly or indirectly impact modern slavery and broader human rights risks in our Australian Operations.

Policy	Overview and relevance to modern slavery	Implementation
PwC Australia’s Human Rights Statement	Our Human Rights Statement sets out our belief in our shared responsibility to respect and uphold the human rights of our people and the people we work with, directly or indirectly. It also describes the expectations we have for our suppliers and clients. It outlines the five principles of action the first of which is to avoid causing or contributing to adverse human rights impacts through our activities, and if such impacts occur, address them and provide for or cooperate in remediation in a timely and appropriate manner.	The statement aligns with the PwC Global Human Rights Statement and is reviewed by PwC Australia’s internal Human Rights Group. The Human Rights Statement is publicly available on our website and through our internal policies site.
PwC Australia’s Whistleblower Policy	The Whistleblower Policy provides a framework to report genuine concerns of misconduct, malpractice, irregularities or any other behaviour that is (or is perceived to be) dishonest, corrupt, illegal or inconsistent with our values or policies including modern slavery concerns. The policy applies to our people, clients, suppliers and their personnel, as well as any other individuals we come into contact with in the course of conducting our business activities.	New starters in our Australian Operations must complete a whistleblowing training module as part of their onboarding process. Our Whistleblower Policy, publicly available on our website , forms part of our internal Making Ethical Business Decisions policy.
PwC Australia’s Grievance Procedure Policy	The Grievance Procedure Policy provides a framework for our people to raise grievances about anything to do with their work or other matters connected with our firm, including modern slavery.	This policy is available on our internal policies site and is reviewed annually.
PwC Australia’s Making Ethical Business Decisions Policy	This policy sets expectations for working ethically including the responsibility to report unethical conduct and preventing corruption or unlawful behaviour. It explains what people can do if they encounter a situation at work that is unethical, and how the report will be handled.	This policy is available on our internal policies site and is reviewed annually.
PwC Australia’s Procurement Policy	The Procurement Policy outlines our expectations around purchasing goods and services. It embeds our commitment to work with ethical and responsible suppliers willing to meet specific standards described in the TPCOC, including labour and workplace management and human rights.	The policy is available on our internal policies site and is reviewed annually. In FY23, we aim to review our Procurement Policy in line with updates to our sustainability strategy, including human rights and anti-slavery requirements.



In FY22, we conducted an analysis of the policies in our Australian Operations for compatibility with human rights. The analysis helped us identify which internationally recognised human rights are impacted by our policies, the rights that may not be adequately considered, and the affected stakeholders that may be adversely impacted.

From this review, we identified four policies that provided an opportunity to embed human rights considerations more explicitly. Two of these policies - the Independent Contractors and Subcontractors Policy and the Unpaid Work Experience Policy - are particularly relevant to modern slavery risk.

We also produced an internal document, to be used as a reference to support the development of new policies or review of existing policies.

Also, in FY22 we reviewed and updated PwC Australia's Human Rights Statement to:

- Include explicit language that demonstrates our commitment to respecting human rights
- Include a commitment to respect the Rights of Indigenous Peoples as described in the *United Nations Declaration on the Rights of Indigenous Peoples*.

The Human Rights Group reviewed and endorsed these amendments, and this was approved by the Executive Board sponsor. We acknowledge that the UN Guiding Principles state that businesses should respect all internationally recognised human rights, not just a select few. While we remain alert to all potential human rights risks, we acknowledge that some rights will be more relevant to our business operations than others, and we call these out explicitly in our Human Rights Statement.

Ethics and conduct

The [PwC Ethics Helpline](#) is available to all PwC people and external stakeholders, including clients and third parties, 24 hours a day, every day, to ask for advice or report concerns or unethical conduct. Reports can be made online or via phone. Issues can be reported anonymously and are taken seriously and handled in confidence. The helpline is managed by NAVEX Global, a third party contracted for the benefit of the PwC network.

PwC's offshore controlled entities also report and manage ethics and conduct issues through the helpline.

In FY22, PwC Australia's Employee Relations Panel was re-configured as the People & Ethical Conduct Panel. The Panel is responsible for the oversight and management of serious conduct matters, including making decisions as to the consequences and communicating these to the Executive and Governance Boards. Also in FY22, a review found that, while the Panel's remit covers human rights, including modern slavery, this was not called out explicitly. The Panel's Terms of Reference were subsequently amended to include a specific reference to these issues.

Third-party risk

PwC Australia's Procurement team has a dedicated Procurement Governance function that manages third-party governance and compliance in our Australian Operations. This function screens suppliers, conducts interviews with hot spot category suppliers, manages third-party procurement policies and procedures, facilitates the investigation of any adverse reports or supplier non-compliance with PwC policies and codes, and administers our supply base management system. For PwC's offshore controlled entities, teams with procurement responsibilities work with their respective legal and risk teams to manage third-party risk and compliance matters.

PwC ASEANZ's offshore controlled entities

In FY22, PwC Australia continued to work with Offshore Local Firms that support PwC ASEANZ's offshore controlled entities in Singapore and Malaysia and commenced working with New Zealand. We shared our learnings, processes and policies used in our Australian Operations to address human rights issues in our supply chain. Additionally, we canvassed how we might enhance our respective controls around the TPCOC and adopt a regional focus on managing third-party due diligence. During FY22, Offshore Local Firms in Singapore and Malaysia screened their new tier-one suppliers using a third-party information bureau, similar to our Australian Operations. Risk assessments are still ongoing. We aim to continue to encourage and collaborate with other Offshore Local Firms that support PwC ASEANZ offshore controlled entities in their supplier due diligence activities.

PwC PNG

In FY22, PwC PNG maintained its focus on third-party and supplier governance through its governance group that comprises members from its Risk, Legal, Human Resources, Finance and Technology functions. This group met periodically to monitor PwC PNG's adoption of the TPCOC and human rights protections and, among other things, continue to develop and implement its supplier risk assessment framework. Members of PwC PNG's governance group met with PwC Australia's Procurement Governance team to exchange learnings and experiences. PwC Australia aims to support PwC PNG to establish a targeted process for assessing and addressing risks in connection with suppliers.



2. Risk Assessment

Modern Slavery risks in our operations and supply chain

The United Nations Guiding Principles on Business and Human Rights (UNGP) are the global standard for preventing and addressing business-related human rights harms, including modern slavery. The principles help businesses to determine their level of involvement in actual or potential human rights abuses such as modern slavery based on a continuum of involvement - cause, contribute and directly linked - and understand how they are expected to respond, including in relation to remediation. We have considered how we might apply this continuum to our Australian Operations and supply chains. We acknowledge the potential to be directly linked to adverse human rights impacts through our entire value chain, not just within our operations and supply chains.

Cause	Contribute	Directly linked
<p>Businesses can be involved in modern slavery where their actions (or omissions) result in modern slavery practices.</p> <p>Where a business identifies it has caused (or might cause) an adverse human rights impact, it should take the necessary steps to cease or prevent the impact, and provide for or cooperate in remedy to affected individuals.</p>	<p>Businesses can contribute to modern slavery where their actions (or omissions) are so significant that the abuse would have been unlikely to occur without them. This includes actions or omissions that facilitate or incentivise modern slavery.</p> <p>Where a business identifies it has contributed to (or might contribute to) an adverse human rights impact, it should cease or prevent its contribution and use leverage to mitigate any remaining impacts to the greatest extent possible, and provide for or cooperate in remedy to affected individuals.</p>	<p>Businesses can be directly linked to modern slavery, where they are connected to modern slavery through their products, services or operations. This includes through the actions or omissions of suppliers beyond the first tier.</p> <p>Where a business's operations, products or services are directly linked through a business relationship to an adverse impact, it should use leverage to influence the entity causing the adverse impact to prevent or mitigate the impact, and may also choose to play a role in remediation.</p>

Our supply chain risk profile

Modern slavery risks can be found through the goods and services we procure and the regions in which we operate. PwC Australia reviews the risk profile of our supply chain in response to changing environments at local and global levels. We assess modern slavery risks to our Australian Operations by considering four categories of risk: industry, supply, geography and entity. We use reputable tools such as the Global Slavery Index, the Transparency International Corruption Perceptions Index and the Responsible Sourcing Tool. We also use information collected in our due diligence processes, including the results from supplier questionnaires, interviews and third-party information bureaus.

In FY22, we shared the risk categories, FY21 findings and FY22 work outline with our offshore controlled entities.



1. Industry risks

- Reliance on migrant, seasonal, base skilled or unskilled workers
- Reported occurrences of modern slavery or other unlawful labour practices
- Reliance on offshore labour agencies



2. Supply risks

- Systemic, excessive discounted pricing or shortened delivery times
- Known or reported association of labour exploitation with production/supply of goods/services



3. Geographic risks

- High prevalence of human rights violations or occurrences of modern slavery
- Reported weak rule of law, systemic corruption
- Inadequate worker protections or high prevalence of law enforcement hostility towards workers



















4. Entity risks

- Reported non-compliance or convictions in connection with human rights or modern slavery laws
- Poor or inadequate policies, processes, including candidate-funded recruitment practices
- Poor reporting mechanisms or opaque and complex supply chains




In addition to mapping tier-one suppliers to our Australian Operations, we have also started mapping some tier-two suppliers who operate in modern slavery hotspot categories.






In FY22 we identified the following seven modern slavery risk hotspots within our operations, the operations of our controlled entities and supply chains.

Modern slavery risk hotspot	Risk category	Description of product or service	Modern slavery risk	Potential forms of modern slavery
1. Offshore operations		These are operations located outside of Australia that include partners and staff directly employed by PwC ASEANZ's offshore controlled entities who provide skilled services and access to resources.	Some of our owned or controlled offshore entities operate in countries with a higher prevalence of modern slavery. While we assess the risk of modern slavery occurring as low, given entities are subject to PwC network regulations and policies, we acknowledge that there is always a potential risk. We note that these entities are subject to heightened levels of risks, which increase where there is overlap with other risk factors.	
2. Contingent workforce	 	Approximately 11% of the workforce in our Australian Operations are contingent workers. Some of PwC's offshore controlled entities also use contingent workers. Most of these contingent workers are skilled specialists, and in some cases, are self-employed, providing professional services for internal PwC or external client matters.	There is a potential risk of being directly linked to modern slavery, where contingent workers (typically in administrative and support roles) may be more vulnerable when engaged via managed services providers. This is especially the case where there is poor visibility of the arrangement between the worker and the provider. This risk may also increase when the arrangement is located overseas.	Forced labour, debt bondage, deceptive recruitment for labour services
3. Facilities cleaning and simple maintenance services	 	PwC Australia and our offshore controlled entities engage suppliers who provide cleaning and simple maintenance services (including for COVID-19 safe practices) across our offices. Less than 2% of supplier spend in our Australian Operations goes to organisations operating in this hotspot category.	There is a potential risk of being directly linked to modern slavery, where workers in these industries may come from vulnerable populations within and outside Australia. This risk is heightened when we have limited visibility of their management and where workers perform base-skilled tasks or work outside business hours.	Forced labour, debt bondage, deceptive recruitment for labour services
4. Stationery and branded merchandise products	  	From time to time, we buy stationery and branded merchandise for use in marketing campaigns or related initiatives. PwC Australia buys these products from a limited number of suppliers to our Australian Operations. Our offshore controlled entities buy these products from various suppliers, directly from, or through, their respective Offshore Local Firms.	There is a potential risk of contributing to or being directly linked to modern slavery when we use suppliers that rely on offshore supply chains over which we have limited visibility. This risk may be heightened when goods are made by base-skilled workers on a demand basis or under pressure of unreasonable deadlines.	Forced labour, debt bondage
5. IT hardware and peripherals	  	We use various technology hardware as part of our day-to-day work, including laptops, monitors, headsets, keyboards and other IT peripherals. In our Australian Operations, we source laptops directly from the manufacturer. We purchase all other IT peripheral products from a limited number of suppliers based in Australia with onshore and offshore supply chains. Our offshore controlled entities buy these products from various suppliers, either directly or through their respective Offshore Local Firms.	There is a potential risk of being directly linked to modern slavery when we use suppliers that rely on offshore and/or complex supply chains over which we have limited visibility. This risk is heightened when goods are made by base-skilled workers on a demand basis.	Forced labour, debt bondage, deceptive recruitment for labour services

 **Keys**
 Industry risks
  Supply risks
  Geographic risks
  Entity risks



Modern slavery risk hotspot	Risk category	Description of product or service	Modern slavery risk	Potential forms of modern slavery
6. Offshore suppliers	 	<p>In FY22, we engaged 13 offshore suppliers in our Australian Operations based in countries with a high prevalence of modern slavery risks. We also engaged other PwC network firms, such as India, the Philippines and the United Kingdom to perform, or help us perform, services for our clients, such as client relationship management, systems administration and quality reviews.</p> <p>Our offshore controlled entities also use offshore suppliers and other PwC network firms globally.</p>	<p>There is a potential risk of our Australian Operations contributing to or being directly linked to modern slavery as we have identified tier-one suppliers that are based in countries with higher modern slavery risks.</p> <p>PwC's offshore controlled entities also engage with offshore suppliers that are based in high-risk countries.</p> <p>This modern slavery risk increases where there is an overlap with other risk factors.</p>	Forced labour, debt bondage, deceptive recruitment for labour services
7. Hotels and accommodation suppliers		<p>We use various hotels across Australia and around the world for business-related travel. Primarily, the hotels we use are part of a 'preferred hotel' list comprising approximately 100 hotels in Australia and 1700 hotels globally.</p> <p>The list is managed at a global level across the PwC network and is reviewed annually. In most cases, the hotels we use are franchised under global hotel groups that do not own or control those individual hotels.</p>	<p>There is a potential risk of being directly linked to exploitation within the hotel accommodation industry due to its increased use of vulnerable workers, limited oversight from global hotel groups as franchisors, and limited view of guest activities within the booked accommodation.</p>	Forced labour, deceptive recruitment for labour services, human trafficking

 **Keys**
 Industry risks
  Supply risks
  Geographic risks
  Entity risks

In FY22, we broadened our scope for modern slavery risk assessments in our Australian Operations and adopted a two-phase approach:

- Inherent risk assessment** - The unmitigated level of risk; an assessment of the risk without any critical controls operating or in place, any risk management actions or other mitigating activities.
- Residual risk assessment** - The risk remaining after taking into consideration the effectiveness of treatments and critical controls applied to reduce the likelihood and impact of the risk.

Inherent risk assessment

We used reputable tools to identify and categorise risks of modern slavery incidents in our tier-one supply chain (excluding suppliers who are PwC network firms), considering the supplier's industry, goods and services supplied and geographical location. Categories determined to have a high prevalence of modern slavery were deemed to be 'hotspot' categories, and suppliers in those categories were given a high inherent risk rating.

Residual risk assessment

Adopting a risk-based approach, we completed further due diligence on hotspot category suppliers with whom we have a realistic opportunity to influence positive change. After completing our additional due diligence and other risk-mitigating activities, the number of those hotspot category suppliers deemed to be 'high risk' fell by 37%.

FY22 supplier risk assessment results:

Risk type	High risk suppliers	Proportion of FY22 spend	Medium risk supplier	Proportion of FY22 spend	Low risk suppliers	Proportion of FY 22 spend
Inherent risk	167	19.6%	N/A	0%	1,892	80.4%
Residual risk	105	0.5%	38	2.2%	1,916	97.3%



Material risk profile

In FY22, PwC Australia considered key causes of modern slavery risk, along with preventative and mitigating controls, such as ongoing monitoring of policies and guidance frameworks and supplier due diligence processes. These modern slavery risks are considered as part of our strategic risk profile.

3. Due Diligence

PwC Australia continues to embed due diligence activities and protocols in our day-to-day operations to tackle modern slavery risks.

Offshore operations due diligence

All PwC network firms (including PwC's offshore controlled entities) must abide by certain network policies including the Code and TPCOC. While compliance is subject to self-assessment, PwCIL may, from time to time, require PwC network firms to undergo reviews or audits.

We continued to work with our offshore controlled entities in Singapore, Malaysia and New Zealand, as well as PwC PNG, to align how we address human rights, including modern slavery, issues using the TPCOC, the Code and the PwC Global Human Rights Statement. The collaboration resulted in enhanced supplier onboarding via simplified supplier questionnaires and appropriate risk assessments based on local requirements linked to the TPCOC. We supported our other offshore controlled entities by sharing the findings from our activities through template reports and dashboards, and suggested content for staff training. We will continue to seek and encourage collaboration across the region to address modern slavery risks.

Contingent workforce due diligence

Approximately 11% of the workforce in our Australian Operations were engaged as contingent workers either directly or through labour-hire agencies in FY22. Most contingent workers are skilled specialists providing professional services for internal PwC or external client matters. All labour-hire suppliers to our Australian Operations must follow applicable laws regarding licensing, workplace health and safety, right to work, fair pay and human rights. These agencies must also confirm that they comply with our TPCOC.

Our offshore controlled entities primarily engage any contingent workers directly or through their PwC Local Firms, which operate under the Code.

Our due diligence activities did not identify any reported modern slavery incidents occurring in these agencies' operations or supply chains in FY22.

Talent acquisition process for contingent workers

In FY22, the People & Culture team in our Australian Operations engaged an external talent strategy advisory firm to support an independent review of our Talent Acquisition function, including a contingent hiring workstream. The outcome was a list of recommendations for cohesive and streamlined improvements, including opportunities to mitigate the risk of modern slavery. Following this review, we will continue to look at ways to address the risks of modern slavery as we transform our contingent hiring practices in our Australian Operations.





Client acceptance

In FY22, PwC Australia began to look at the client acceptance process to understand where a human rights lens could be applied. As a result, an additional question was added to the Client Acceptance Questionnaire for engagement teams to consider prior to undertaking a client engagement:

[Does the potential client have] any indications of involvement in human rights violations/modern slavery or of failure to deal with employees in an ethical manner?

We will continue to review and consider how we incorporate a human rights lens into the client acceptance criteria and evaluation process.

Supplier due diligence

Supplier screening

In FY22, we screened 100% of new and existing tier-one suppliers to our Australian Operations who were paid via our Accounts Payable function (other than suppliers who are PwC network firms) through self-assessments and desktop screening using third party information bureaus. These are suppliers with whom we spent more than \$5,000. We also continued to screen tier-two suppliers focusing on those tier-two suppliers who work with our tier-one suppliers in modern slavery hotspot categories.

We did not identify any modern slavery incidents through these screening activities. We acknowledge that this does not eliminate the possibility of the existence of modern slavery in our supply chains.

During the year, we enhanced our supplier self-assessment process in our Australian Operations for our supply base management system. This system captures relevant information through an updated, more streamlined, set of onboarding questions to help us identify and assess our supplier risks, including modern slavery and other human rights issues. Based on supplier feedback, we adapted our process to allow tier-one suppliers to reconfirm their data in our system each year and provide additional information should their response change after thereafter. These improvements help us identify and address suppliers in hotspot categories sooner and at meaningful points in the engagement.

PwC ASEAN's offshore controlled entities in Malaysia and Singapore continue to participate in a similar systems transition to embed risk and due diligence processes in their operations and compliance with our TPCOC. We aim to share this evolving approach with all of our offshore controlled entities to enable alignment across our firms in our supplier due diligence frameworks.

Supplier engagement in hotspot categories

In FY22, we committed to focus the risk assessment approach for our Australian Operations on suppliers in modern slavery risk hotspots, based on their geography and category of supply. We identified 167 suppliers that returned a 'high' inherent risk of modern slavery to people involved in their operations and supply chains. We further narrowed the scope to those suppliers with whom our spend exceeded AUD \$50,000 per annum. We interviewed 33 of 34 suppliers identified in this category (who together, represent 91% of our total supplier spend). Introducing a spend threshold criteria to our due diligence activities allows us to focus on those supplier relationships where we have the greatest leverage. We discussed how they are addressing their modern slavery risks, and how we can support each other to improve both our approach and their approach in addressing those risks.

We reserve the right not to engage, or terminate our existing engagement, with suppliers that do not cooperate with our reasonable requests for information or action.

Enhancing supplier contractual terms and practices

In our Australian Operations, our new supplier contracts (other than supplier contracts with other PwC network firms) include responsible supply terms and conditions that require suppliers to implement reasonable controls to ensure they appropriately remediate any actual or perceived breach of the TPCOC or a modern slavery incident. The terms would allow us to suspend services or terminate the agreement if the breach or incident is not remedied within a reasonable time frame.

We take a risk-based approach for incumbent contracts, focusing on suppliers in modern slavery risk hotspots. We also include the responsible supply terms and conditions in our template Purchase Order terms, which we use for a broad cross section of our tier-one suppliers.

In FY22, we reviewed our agreements with contingent labour and recruitment agencies engaged by our Australian Operations. We identified several ways to better address modern slavery risks, for example, incorporating specific prohibitions and actions to be observed during the recruitment process and when interacting with candidates on behalf of our Australian Operations. We will pilot the enhancements with selected agencies in FY23 and implement a plan to adopt them broadly across new and incumbent agencies.

Many of our offshore controlled entities have an obligation for suppliers to comply with the TPCOC embedded into their template supplier agreements. PwC Australia's Procurement team is working with PwC PNG and PwC ASEAN's offshore controlled entities in Malaysia and Singapore (and their respective Offshore Local Firms) to continue to enhance their supplier contracts.



4. Training

Our approach to modern slavery presents an opportunity to educate and contribute to real change in the lives of the people impacted. Increasingly, our people are asking how we can better support their understanding of modern slavery and broader human rights risks.

In FY22, we focused on training, awareness raising and upskilling in our Australian Operations for key personnel. We aimed to ensure our people understood their shared roles and responsibilities for managing and addressing modern slavery risks. We trained our people to identify the red flags of modern slavery and how to raise concerns effectively. We also demonstrated how our business activities could inadvertently create a situation that enables modern slavery to proliferate.

PwC Australia engaged specialist business and human rights advisory firm, Pillar Two, to provide a third-party perspective, complement PwC's in-house human rights capability and support Executives and Board members of reporting entity Boards and internal stakeholder upskilling. We know that collaboration with external specialists bolsters our continuous improvement efforts, and we welcome new perspectives to help us deliver on our modern slavery responsibilities.

“ Understanding how modern slavery could be present in our operations and supply chains is our first line of defence. Providing training and development opportunities for our people on human rights issues is critical to identifying and responding to potential issues early. There is more work to do, and we welcome collaboration as we continue the fight against modern slavery, in all its forms.”

Janette O’Neill, PwC Australia’s Chief Sustainability Officer

73% of reporting entity board members increased in their understanding of the requirements of the Modern Slavery Act

“ Modern slavery and human rights issues are critically important topics for PwC’s Boards. The training was targeted, relevant and timely and it provided a meaningful opportunity for active discussion of how modern slavery might manifest in our business and how we can guard against it.”

PwC Australia Governance Board member

*taking into account that some board members started with a more sophisticated understanding of the topic.

Executive and Board Member training

- 45 minute training session, designed and delivered by Pillar Two
- 20 attendees (representing all five reporting entity boards)
- Board members were provided with an opportunity to deepen collective knowledge and understanding of modern slavery and human rights to support their governance and strategic decision-making, and to discharge their responsibilities on behalf of the reporting entities for the Modern Slavery Statement
- Through the training attendees were provided:
 - an overview of human rights and stakeholder expectations
 - how professional services entities can impact human rights
 - an update on changing legislative frameworks within the business and human rights remit
 - the business case for action to address modern slavery and broader human rights risks
 - review of how PwC is managing these risks
 - an overview of the role of the board in managing modern slavery and other human rights risks

77% of key stakeholders increased in their understanding of modern slavery, including how this issue is relevant to PwC



The training was a great opportunity to sharpen my knowledge and understanding of the modern slavery risks in my functional area and across the broader firm. The training was informative, and the real-world examples brought home how close we all could be to modern slavery. The discussion it provoked with my colleagues made clear the need for ongoing collaboration.

PwC Australia Director,
Business Risk

*taking into account that some key stakeholders started with a more sophisticated understanding of the topic

Social Impact Intranet (guidance and reference for our Australian Operations)

- The Social Impact intranet provides information and reference materials to raise awareness of modern slavery risks in connection to our business activities, including:
 - information and links to PwC Australia's Human Rights Policy and Modern Slavery Statement
 - how human rights and modern slavery are relevant to business, the Rights of Indigenous Peoples, and what actions our people can take to help manage our modern slavery risks
 - a guidance document that outlines how to respond to questions from our clients and suppliers about our approach to modern slavery
 - information on the Human Rights Group and the various policies in place to guide decisions and behaviour
- This content is reviewed and updated annually, or as required.

Key stakeholder training

- Senior stakeholders were identified as having a key role to play in enabling PwC to advance our modern slavery response, and in educating their teams on how to identify and address modern slavery in our operations and supply chains
- Offshore controlled entities were invited to participate in this session. We were joined by representatives from PwC PNG, PwC Singapore and PwC New Zealand.
- 1-hour interactive training session, designed and delivered by Pillar Two
- 31 key internal senior stakeholders attended including Procurement, People & Culture, Business Risk, Workplaces, Partnership, and Social Impact
- Through the training, our key stakeholders were provided:
 - an overview of modern slavery and why it is important to take action
 - how modern slavery is relevant to PwC's procurement process
 - modern slavery risks for PwC
 - tools and processes available to key stakeholders to manage these risks
 - a series of 'real world' dilemma scenarios
 - information about key modern slavery red flags and how to report concerns

Modern slavery awareness training module for our Australian Operations

- 20-minute interactive upskilling session, including knowledge quiz
- The mandatory Modern Slavery Awareness training module for new starters was refreshed to include a greater focus on modern slavery risks in the Asia-Pacific region and an interactive knowledge quiz. This training aimed to help our people better identify human rights risks in their work and the third parties they engage with.
- On completion of the training new starters were provided:
 - an overview of modern slavery today
 - a summary of modern slavery in the Asia-Pacific region
 - a summary of modern slavery risk indicators
 - information on how to address modern slavery risks at PwC Australia
 - how to report a modern slavery concern
 - a quiz to test knowledge
- We have shared the content of this training module with our offshore controlled entities

95% of PwC Australia's new starters completed the Modern Slavery Awareness training module by 30 June 2022



5. Grievance and Remediation

PwC Australia is committed to providing for, or cooperating in, remediation where we identify we have caused or contributed to human rights harm such as modern slavery, and we recognise that we may also choose to play a role in remediation where we identify we are directly linked to the harm.

Supply chain

PwC Australia is committed to building a strong and sustainable supply chain by collaborating with our suppliers, and sharing our knowledge and experience. We know that effectively engaging with suppliers promotes greater transparency and allows us to assess our supply chain and reach beyond tier-one suppliers. It also helps us to mitigate risks and remediate any identified modern slavery incidents.

In FY23, our procurement team will develop a remediation strategy process and approach that sets out the steps we will take if we become aware of a modern slavery incident in our Australian Operations' supply chains.

Operations

PwC Australia's National Incident Response Team (NIRT) provides oversight and professional advice in relation to the Australian Operations at each step of the response process where an incident affects individuals, our clients or our ability to do business. The NIRT operates according to a plan which sets out our responsibility to remediate harm where we identify that we have caused, contributed to, or are directly linked to through our business activities, including a modern slavery incident.

In FY22, a supplemental reference guide was developed to support the NIRT. The guide outlines the human rights considerations, including modern slavery, to be addressed when an incident is identified in the Australian Operations and supply chains. The guide is aligned with the UNGP's criteria for effective grievance mechanisms and is included as an appendix to PwC Australia's National Incident Response Plan.

Speak up campaign

PwC Australia sets a strong tone from the top on the behaviours and culture we expect of our people, including following our business requirements and doing the right thing. We want to be a place where everyone feels comfortable bringing their whole self to work, feels safe to ask questions or raise concerns, and is confident that issues will be handled in a sensitive and considerate way.

In FY22, PwC Australia launched our Speak Up campaign to encourage our people to Speak Up, Listen Up and Follow Up when they see behaviour that isn't right. A dedicated microsite and toolkit provides support and practical guidance on what to do if inappropriate or unethical behaviour is experienced or witnessed, the channels to make a report, including via the PwC Ethics Helpline, and the sources of support available, such as the Employee Assistance Program and various external support networks. This is underpinned by our People and Partner Consequence Management Policies which ensure we have robust, transparent and consistent practices in place for managing consequences of unacceptable behaviours.

A Speak Up learning module was included in PwC Australia's firmwide mandatory training, with firmwide communication on the launch, reinforcing our commitment to creating a work environment where our people are safe and feel they belong.

PwC's offshore controlled entities also provide grievance mechanisms in line with their local policies and the global commitment to ethical behaviour, compliance with the law, PwC's Global Code of Conduct and embedding a Speak Up culture.

PwC Australia's April 2022 firmwide mojo survey

81% of respondents in our Australian Operations agreed or strongly agreed with the statement:

“ At PwC I feel comfortable discussing or reporting ethical issues and concerns without fear of negative consequences.”



Case study

Collaboration to address modern slavery

On the 9th of June 2022, PwC Australia was invited to be a guest speaker and participant in the South Australian Modern Slavery Workshop at the University of South Australia, in collaboration with the Centre for Enterprise Dynamics in Global Economies. The purpose of the workshop was to provide a forum for discussion on:

- the current state of play in South Australia about addressing modern slavery,
- priority issues to progress action on modern slavery in Australia,
- how stakeholders across the community can collaborate for collective action,
- the merits of establishing a multi-stakeholder Modern Slavery Research and Practitioner Network in South Australia.

Forty stakeholders attended the workshop, representing business, government, civil society, unions, academia and lived experience. Participants discussed their experiences, challenges and aspirations about addressing modern slavery risks, and explored ideas on how stakeholders could collaborate on complex and shared problems, including:

- education and awareness raising
- how entities measure the effectiveness of their modern slavery actions
- lift the level of investment, knowledge and resources for those managing complex supply chains
- ensure the voice of those with lived-experience remains a central pillar of modern slavery action
- support stakeholders who have found evidence of modern slavery to talk about this publicly so that others can learn from it

Cross-sector collaboration is critical to achieving target 8.7 of the Sustainable Development Goals, which is focused on stakeholders taking: 'immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour... and by 2025 end child labour in all its forms'.

Modern slavery is a complex problem that requires a holistic response if we are to accelerate progress in this area and achieve real impact. PwC Australia was pleased to have participated in a workshop that fostered open dialogue, collaboration and the exchange of expertise and innovative ideas.



By being inclusive and continuing the conversation, we will be able to move forward in creating something tangible that will be of benefit to the entire South Australian community and beyond as we strive to eliminate modern slavery for good.”

Dr Katherine Christ PhD, BCom(Hons), AdvDipAcct, CPA
Senior Lecturer in Accounting UniSA Business

At a global level, PwC continues to be a proud signatory to the [United Nations Global Compact \(UNGC\)](#). We remain deeply committed to the UNGC's Ten Principles for responsible business practices and steadfast in delivering positive societal and environmental outcomes. Locally, in FY22 PwC Australia joined the [United Nations Global Compact Network Australia \(GCNA\)](#) and participated in the GCNAs Modern Slavery Community of Practice.



6. Monitoring and Reporting

Tracking our actions allows for continual improvement in measuring the effectiveness of PwC Australia's approach to addressing modern slavery risks.

In FY22, we used our Modern Slavery In Supply Chain Risk dashboard, which incorporates data from our supplier due diligence and risk assessments, to identify areas of concern, track our progress in the supply chain of our Australian Operations and capture information about tier-two suppliers. We also updated the dashboard to reflect our enhanced risk classification and assessment of inherent and residual risk, which will simplify how we manage supply chain risks and report to our stakeholders. The dashboard was made available to our offshore controlled entities and will be a focus for proposed improvements to supply chain risk reporting in FY23.

We also shared insights with the suppliers that we interviewed as part of our due diligence process. These insights included findings and modern slavery risk trends identified from previous interviews, aggregated supplier self-assessment results, anonymised supplier feedback and market reports. Looking ahead, we aim to provide further guidance and data to support our suppliers to do the same with the suppliers they engage to deliver goods and services to our Australian Operations.

Globally, PwC Australia and PwC ASEANZ and our respective offshore controlled entities participate in PwC network reporting of actions taken to continue to improve the adoption of the TPCOC.

Analysis of PwC Australia's Human Rights Statement

In FY22, PwC Australia undertook analysis of our Human Rights Statement in collaboration with our Business Risk team. The analysis helped us identify, manage, and monitor human rights obligations as described in PwC Australia's Human Rights Policy and ensure translation of our policy commitments into practice.

We focused on risks to the human rights of people, as well as risks to PwC Australia's operations and supply chains, which incorporated both actual impacts (past or current) and potential impacts (those possible in the future).

Applying the human rights principles outlined in our policy, we assessed the likelihood of an incident occurring and the potential consequences. We considered a range of principles, including:

- hiring and employment practices
- workplace health, safety and wellbeing
- third party engagement (supply chain)
- child labour
- human trafficking, modern slavery and forced labour

We identified five areas where the risk was 'moderate'. All other areas were considered 'low'. The greatest risk of modern slavery occurring is within our supply chains. Some risk areas are also addressed in PwC Australia's material risk profile.

PwC Australia has an advanced framework of control measures that mitigate human rights risks to our people and those we are in contact with. We also acknowledge that assessing these risks must be an on-going process, repeated in instances where risks to any human rights may change.



Status of future focus areas outlined in our FY21 Modern Slavery Statement, and described in this statement

We acknowledge that some areas of focus will require ongoing work as we continue to evolve our approach.

	Future focus area	Status
Governance	Consider all new and existing policies in our Australian Operations for opportunities to embed or strengthen human rights considerations.	Completed
	Work with People & Culture to review all people-related policies to identify where modern slavery considerations can be embedded or strengthened.	Completed
	Work with our People & Ethical Conduct Panel to assess the degree to which the Panel includes a focus on human rights issues, including modern slavery, as reported through Speak Up, the PwC Ethics Helpline and other grievance mechanisms.	Completed
Risk Assessment	Continue to map our tier-two suppliers within modern slavery risk hot spot categories in our Australian Operations.	Ongoing
	Support more of our offshore controlled entities in their supplier risk identification and assessment activities.	Ongoing
Due Diligence	As part of the review of the talent acquisition process for contingent workers, identify opportunities to improve, strengthen and streamline existing processes to better support the experience for our people and contingent workers, and identify opportunities to mitigate modern slavery risks.	Completed
	Narrow the focus of our approach on supply chain due diligence and risk assessment for the Australian Operations to those suppliers in modern slavery risk hot spots.	Ongoing
	Continue to embed our responsible supply terms and conditions in new supplier contracts and Purchase Orders issued within our Australian Operations. Continue to support our offshore controlled entities to enhance their supplier contracts.	Ongoing
Grievance and Remediation	Continue to embed human rights considerations into PwC Australia's National Incident Response and Business Continuity Plan and work with functional teams and frameworks when local incidents are identified.	Ongoing
	Launch a new Speak Up campaign to encourage our people to confidentially raise their concerns about the ethical conduct of the firm, its clients, its suppliers or others in the community they interact with as part of their role at PwC.	Completed
Training	Enhance Modern Slavery Awareness training for people in our Australian Operations to ensure it remains relevant and appropriate.	Completed
	Equip our people to identify human rights risks connected with the work they perform and the third parties they engage.	Completed
	Share the Modern Slavery Awareness training module with our offshore controlled entities.	Completed
Monitoring and Reporting	Review and update our human rights risk analysis and reporting based on PwC Australia's Human Rights Statement to improve how we manage our human rights risks in our Australian Operations, including identifying potential modern slavery risks and implementing appropriate risk management measures.	Completed
	Continue to improve the scope of our Modern Slavery In Supply Chain Risk dashboard.	Completed
	Continue to share our Modern Slavery In Supply Chain Risk dashboard with our offshore controlled entities.	Ongoing



Assessing the effectiveness of our actions

Assessing the effectiveness of our actions is critical for ensuring we understand the impacts of our business on modern slavery and broader human rights, and continually improve our approach.

We will use KPIs, and a range of measures to monitor and assess the effectiveness our actions, including:

- operational tracking of policies, processes and training initiatives
- tracking proactive engagement and communication with suppliers
- reports made through our grievance mechanisms involving modern slavery, and how these reports are handled
- benchmarking our progress against industry peers and other statements identified as best practice
- collaboration with internal and external stakeholders to provide review and feedback

We will continue to adapt and strengthen these, and other measures, over future reporting periods to allow us to continually improve the effectiveness of our approach to addressing modern slavery, and will consider other qualitative KPIs going forward.

Some of the standard modern slavery KPIs identified for our Australian operations include:

Operations

- percentage of new starters who completed mandatory Modern Slavery Awareness training module
- percentage of our people that 'feel comfortable discussing or reporting ethical issues and concerns without fear of negative consequences', as reported in Mojo survey (our employee engagement survey).
- number of new policies reviewed for compatibility with human rights
- number of stakeholders trained in modern slavery

Supply chain

- number of supplier self-assessment questionnaires returned
- percentage of new suppliers screened via the Modern Slavery In Supply Chain Risk dashboard
- number of suppliers identified in hotspot categories
- number of interviews with suppliers operating in modern slavery hotspot categories
- number of tier-two suppliers mapped within modern slavery risk hot spot categories
- number of modern slavery incidents identified in our supply chain



Our consultation and collaboration

Consultation

Management and personnel from all reporting entities have worked together on the activities described in this Statement, and on drafting the Statement itself. The Boards of each reporting entity have approved this Statement.

We engaged widely on our progress in addressing modern slavery risks in our Australian Operations. We consulted with senior management of the Australian Operations and PwC PNG, as well as PwC ASEANZ senior management with regional-level management responsibilities for its controlled entities (including PwC Australia Consulting). These consultations help us to understand the views of senior management in our offshore controlled entities regarding modern slavery risks and the steps that have been taken to assess and address those risks. We will continue to engage in meaningful and ongoing dialogue with all reporting entities as they respond to modern slavery risk in their geographical locations.

Collaboration

In line with PwC's purpose, to build trust in society and solve important problems, we believe the most important problems are better solved together. Modern slavery is a complex, and often hidden, crime that won't be solved overnight or in isolation, so our response must involve collaboration and engagement across our entire business. Various functions, including Social Impact, Procurement, Ethics & Conduct, People & Culture, Diversity, Inclusion and Wellbeing, Strategy, Risk & Reputation and our business teams, including through client interactions, all share responsibility for embedding human rights protections and policies into the way we do business.



Looking ahead

This Statement describes our actions and approach to addressing modern slavery risks for FY22. We aim to review our focus areas each year to improve our approach and build on our progress. We will continue to collaborate and seek to raise awareness of modern slavery risks across our value chain, and provide an example of responsible business practice through our actions. Our priority areas of focus for FY23 are:

- Continue to evolve the Human Rights Group to enhance our governance operating model to effectively address human rights and modern slavery risks in our Australian Operations and supply chains.
- Consult with key stakeholders about how we consider incorporating client human rights risk into our client acceptance processes.
- Embed a sustainability framework, including a focus on human rights considerations, into our Australian Procurement policies
- Develop a detailed remediation strategy through the PwC Australia Procurement team that addresses the principles of human rights when a suspected modern slavery breach is identified in the supply chains of our Australian Operations.
- Review the Modern Slavery Statements of our high-risk suppliers who are required to submit statements and engage with them on their commitments.
- Pilot enhancements to responsible supply terms and conditions in agreements with select contingent labour and recruitment agencies engaged by our Australian Operations to bolster the way we address modern slavery risk in this area.
- Continue to work with various stakeholders across the community, to provide services and points of view on the issue of modern slavery. This includes participating in the statutory review of the Modern Slavery Act 2018 (Cth), drawing on expertise from the PwC global network as required.
- We will share our learnings in these areas with PwC ASEANZ's offshore controlled entities and PwC PNG as they continue to address their modern slavery risks.



Australian Modern Slavery Act mandatory criteria

This table outlines how we have addressed the mandatory criteria of the Australian Modern Slavery Act reporting requirement in this Statement.

Modern Slavery Act Mandatory Criteria	FY22 Joint Modern Slavery Statement	Page
1. Identify the reporting entity	<ul style="list-style-type: none"> Reporting entities 	03
2. Describe the reporting entity's structure, operations and supply chains	<ul style="list-style-type: none"> Our structure, operations and supply chains How and where we operate Goods and services we buy 	05 06 07
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities it owns or controls	<ul style="list-style-type: none"> Our actions 	11
4. Describe the actions taken by the reporting entity, and any entities it owns or controls, to assess and address these risks, including due diligence and remediation processes	<ul style="list-style-type: none"> Our actions 	11
5. Describe how the reporting entity assesses the effectiveness of these actions	<ul style="list-style-type: none"> Assessing the effectiveness of our actions 	25
6. Describe the process of consultation with any entities the reporting entity owns or controls	<ul style="list-style-type: none"> Our consultation and collaboration 	26
7. Provide any other relevant information	<ul style="list-style-type: none"> A message from PwC Australia's CEO Our approach Looking ahead 	04 09 27



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