



MODERN SLAVERY STATEMENT FY2022 THOUGHTWORKS AUSTRALIA PTY LTD

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REPORTING PERIOD

1 JANUARY 2022 TO 31 DECEMBER 2022

Introduction

This statement is made by Thoughtworks Australia Pty Ltd ABN 99 088 279 761 (“**Thoughtworks**”), an Australian company with its registered office at Level 10, 50 Carrington Street, Sydney NSW 2000, in accordance with the requirements of Section 13 of the *Modern Slavery Act 2018 (Cth)* covering the calendar year ending 31 December 2022.

At Thoughtworks, our culture and technology excellence are our most valuable assets and the foundation of our purpose. Our culture is a combination of our purpose, our Why, and our values and is exemplified in the way we treat each other, the way we run our business and the way we conduct ourselves in the world. Our culture has enabled us to grow an authentic and responsible business, and build trust among all our stakeholders, ourselves, clients, shareholders and society.

The criteria set out in section 16 of the *Modern Slavery Act 2018 (Cth)* are set out below, along with the location of our response to each criterion:

No.	Requirement	Our Reply
1.	Identify the reporting entity.	Page 3
2.	Describe the structure, operations, and supply chains of the reporting entity.	Page 4
3.	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	Page 6
4.	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Page 9
5.	Describe how the reporting entity assesses the effectiveness of such actions.	Page 10
6.	Describe the process of consultation with: <ul style="list-style-type: none"> (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement. 	Page 10
7.	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Page 10
8.	Provide the details of approval by the principal governing body of the reporting entity.	Page 11

Reporting entity

Founded in 1993, Thoughtworks started its journey as a privately owned global professional IT services company, specialising in the delivery of highly strategic IT consulting as well as development of custom software solutions with a client base consisting primarily of Fortune 1000 organisations.

Thoughtworks Australia (the reporting entity) is 100% owned by Thoughtworks Holdings Ltd, which is a holding company part of the global Thoughtworks group of companies, which are ultimately owned by Thoughtworks Holding, Inc., (a company incorporated in Chicago, United States). Thoughtworks Holding, Inc., became a publicly listed company on the NASDAQ in September 2021. During the reporting period (1 January 2022 to 31 December 2022), Thoughtworks Australia had no wholly owned subsidiaries.

In addition to our headquarters in Chicago, the Thoughtworks group has offices located throughout the United States, as well as subsidiaries in nearly 20 countries including Australia, Brazil, Canada, China, Germany, India, Singapore, and the UK with 10,000+ employees globally. In Australia, Thoughtworks Australia operates three offices. One in Sydney, one in Melbourne and one in Brisbane (with around 430 FTEs in total at the end of the Reporting Period).

Forced labour

What is it?

The International Labour Organisation (**ILO**) describes 'forced labour' as follows:

.....

Forced labour involves work situations featuring two key, interrelated conditions. The first is a lack of free and informed consent (i.e., involuntariness) in taking the job or accepting the working conditions. The second is the application of some form of coercion, such as a penalty or threat of a penalty, to prevent an individual from leaving a situation or to otherwise compel work.

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Where is it prevalent?

Australia has one of the lowest prevalence ratings for modern slavery. Under data collected by the Global Slavery Index (2018):¹

- For every 1,000 Australians, only 0.65 are estimated to live in a state of modern slavery; and
- Australia is rated 163/167 on the Prevalence Index Ranking (with 1 being the worst, and 167 being the best).

According to the ILO's 2022 Global Estimates, the five sectors accounting for most total forced labour worldwide (87%) are services (excluding domestic work), manufacturing, construction, agriculture (excluding fishing), and domestic work. Of these, services are the largest but also the broadest. This category includes a very wide range of economic activities, including trade, transport, hospitality, and non-market social and other services.

Structure, operations and supply chain

Overview

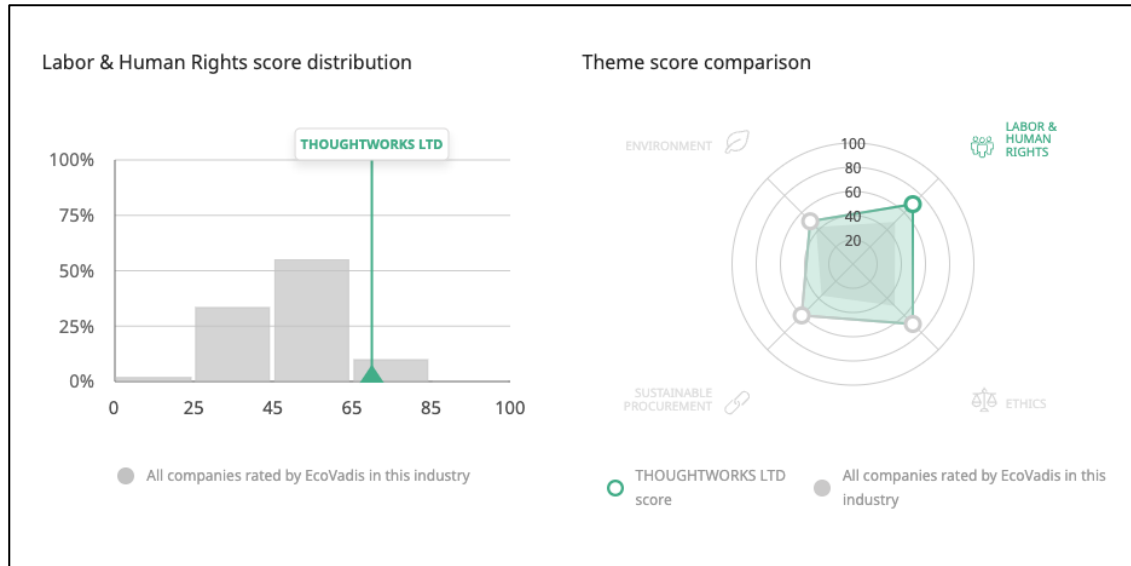
As Thoughtworks' main business operation is the provision of professional services via our consultants, our supply chain continues to be relatively simple. Thoughtworks Australia's largest procurement spends for the Reporting Period are limited to (a) office services and supplies (being rent, which includes associated managed office services) and (b) technology products. We have smaller spends on other professional services like accountants, lawyers and payroll advisors.

At a parent company (or a global) level, we published a statement on Modern Slavery on 27 January 2023, which can be accessed via our website.²

In addition, EcoVadis has assessed Thoughtworks' Labour & Human Rights score to be strong, and above the ordinary cohort of businesses that EcoVadis uses in its assessments. See figure below.

¹ <https://www.globalslaveryindex.org/2018/data/maps/#prevalence>

² https://www.thoughtworks.com/content/dam/thoughtworks/documents/guide/tw_guide_modern_slavery_statement.pdf



Distributed workforce

During the Reporting Period, Thoughtworks Australia received distributed professional services (we have offshore delivery centres and business process services) from our affiliate companies in China, India, Singapore, Thailand, United States and the UK. We also have a significant onshore delivery team. The regions which receive the most of our offshore work are listed below:

Thoughtworks Offshore Centre	Largest offshore partner by ranking
Thoughtworks Software Technologies (Xi'an) Ltd	#1
ThoughtWorks Technologies (India) Private Limited	#2
ThoughtWorks (Thailand) Co., Ltd.	#3
Other	#4

All offshore delivery centres are subject to our global Code of Conduct and other governance measures designed to prevent modern slavery. In addition, Thoughtworks Xi'an, which is our major offshore partner and provider of professional services to us, had its Occupational Health and Safety Management systems certified on 28 October 2022 to comply with GB/T45001-2020 / ISO45001:2018, reinforcing the availability of safe workplaces and practices for Thoughtworks Xi'an employees in China.

Contractors

We also engaged local contractors in Australia, China, India and Thailand for professional services via recruitment agencies with whom our contracts require their compliance with applicable laws and regulations, and Thoughtworks' Code of Conduct. Our use of contractors formed only a very small percentage of our sourcing of personnel.

Risks of modern slavery in Thoughtworks' operations and supply chain

During this Reporting Period, in assessing the risks of modern slavery for Thoughtworks Australia, the following usual aspects were considered:

Risks in our operations

We strongly support the aim of eradicating modern slavery, forced labour and human trafficking. We are committed to acting ethically, and with transparency, in our internal business operations. We are committed to implementing the appropriate measures to ensure that the same standard is applied to external suppliers. We assess the risks of modern slavery in our operations to be low. This is based on:

- (a) the nature of work performed by our employees as well as their working conditions and terms;
- (b) the locations of our offices and those of our clients;
- (c) the limited extent of, and the nature of the firms that make up our supplier network; and
- (d) our recruitment process.

More information about our operations, people and culture can be found on our website.³ With reference to common forms of risk factors published by the International Labour Organisation, we set out our position as against those common factors below.

Common involuntariness risk factors	Thoughtworks' position
Workers being confronted with work circumstances different from and inferior to those agreed at the outset of employment	Thoughtworks' aim to continuously foster a safe and healthy working environment for employees and supplier staff is significant to our business and is supported by various workplace policies, including our Code of Conduct.

³ <https://www.thoughtworks.com/about-us/our-purpose>; and <https://www.thoughtworks.com/about-us/diversity-and-inclusion>

Low or no wages	As a professional services company, our workforce consists mainly of skilled labour in a very competitive market, where wages (including bonuses for some staff) are high. As a result, our roles are both (a) as advertised and (b) lucrative. If this were not the case, our business would not be able to function. In addition, prospective employees are subject to rigorous due diligence process in ensuring the risks of modern slavery are minimised.
Surprisingly hazardous work conditions	
State-imposed forced labour	Thoughtworks does not use state-sourced labour for any of its operations.

Common coercion risk factors	Thoughtworks' position
Systematic and deliberate withholding of accrued wages	Thoughtworks does not withhold wages in a systematic or deliberate way from employees.
Exploiting workers' vulnerability	Thoughtworks continues to pride itself on maintaining high standards of integrity and has workplace policies to ensure that all our employees are treated with respect. This extends especially to those that may have vulnerabilities. We treat all of our people equally regardless of gender, race, religion, ethnicity, age, sexual orientation, national origin, disability, socio-economic status or any other protected characteristics or vulnerable states.
Direct threats	
Restrictions in the ability to change employer because of debt owed to employers, recruiters, or related parties (also known as debt-bondage)	Our employees do not owe debt to us or our recruiters in any circumstances. Thoughtworks Australia pays for recruitment fees.

Risks in our supply chain

Thoughtworks operates as a group business which means that the business structure, standards, policies and procedures are similar and aligned between all of the entities in the group. This includes standards and practices in recruitment and human resources as well as shared global policies and processes such as procurement and compliance functions. Thus we see little risks of modern slavery in the operations of our affiliates in China, India, Singapore and Thailand.

Our supply chain is also relatively small and simple given the nature of our business. We also do not need to procure goods and services in high-risk countries or industries. Thus far, to

the best of our knowledge, we have not been made aware of any allegations of forced labour or modern slavery incidents in any of our suppliers.

The vast majority of our suppliers are based in Australia. A list of our largest third-party suppliers is below:⁴

Four largest accounts for Accounts Payable	Supplier	Services
#1	Knight Frank Australia Pty Ltd	Rent across various offices
#2	CBRE Pty Ltd	
#3	Apple Pty Ltd	Technology products
#4	Bank of America	Banking & Financial Services

Risk factors

In making the above risk assessment, we have also considered the following factors:

Sector and industry risks: Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes (such as manufacturing and logistics). Thoughtworks Australia, as a premium professional IT service provider, is unlikely to be considered a high-risk industry given the nature of highly specialised skills and knowledge required from our employees, as well as the extensive formal recruitment process potential candidates are required to undergo. In our supply chain, we mainly deal with smaller, local vendors on a one-off basis which are not in the high-risk industries.

Product and services risks: Thoughtworks recognises that certain products and services may have high modern slavery risks because of the way they are produced, provided or used such as services that often involve lower wages and manual labour. From our supply chain, we believe that the office cleaning and catering service providers are likely to belong to the high risk industry category and as such have taken steps to mitigate the risks associated with these providers as described in the mitigation below. This currently represents a small portion of Thoughtworks Australia's procurement spend. For vendors that provide professional services, they are typically from major firms (such as EY and Fragomen) and would be subject to the same modern slavery reporting requirements under legislation. Our main suppliers have published their own statements on Modern Slavery, available on their websites.

Geographic risks: Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like

⁴ We have included those with >5% of our Accounts Payable for the Reporting Period.

poverty. This is also a low risk for Thoughtworks as the majority of our suppliers are based in Australia. We acknowledge countries such as Thailand, India and China where we are receiving intra-company services from, may be considered high risk countries. However, we are confident this is low risk in the case of the Thoughtworks group as Thoughtworks entities operate similarly in the core aspects across all the countries to ensure the same level of service quality delivered to our clients as well as adhering to our core values of equality and transparency.

Entity risks: Some entities may have particular modern slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations. Thoughtworks Australia considers these to be predominantly in the manufacturing, resources and retail industry and as such are not directly linked to our current supply chain.

Notwithstanding the above, Thoughtworks recognises that even where these risks may not have been identified, there is the potential for them to exist, particularly deep in the supply chain. Our Procurement function continues to use our established online portal to manage suppliers in order to obtain better visibility of the entirety of our supply chain and proactively monitor the risks.

Mitigation actions to address risks

Our employees in Australia undergo an extensive recruitment process that includes verifying an individual's right to work in Australia via VEVO using copies of the employee's identification and visa documents, execution of an employment contract with terms adhering to the requirements of Fair Work Australia, including the National Employment Standards. All new employees are also provided with a Fair Work Information Statement. We do not retain any of the employees' original identity documents nor make any unauthorised deductions from the employees' payroll. We also provide our employees with a number of benefits as outlined here <https://www.thoughtworks.com/careers/au/benefits>

In addition, due to the nature of our global businesses which requires employees to travel to or from any of our group companies based outside of Australia, through our Mobility function, Thoughtworks takes measures to ensure that this only takes place in adherence to local immigration rules including but not limited to compliance with relevant local employment laws and wages standards. In relation to our supply chain, all new suppliers onboarded to our procurement portal are required to make a commitment to "*eliminating modern slavery, forced labour or human trafficking in their supply chains and in any of their corporate activities*". They are also required to comply with our Code of Conduct as well as relevant laws and regulations, as per our standard contractual terms. Suppliers are also required to notify us of any breaches of the Code. We have also established a global Procurement function with a formal supplier

vetting process to increase the maturity of our supplier due diligence program. Our Procurement function has provided guidance to the business on selecting socially aligned suppliers, including checking compliance with local anti-slavery laws. We also have a number of policies that allow both our employees and suppliers to report concerns, suspicions and breaches of the Code of Conduct, including those relating to modern slavery:

1. Code of Conduct
2. Work Health & Safety Policy
3. Whistleblowing Policy

Thoughtworks Australia had **no modern slavery grievances** raised during this Reporting Period.

Assessment of effectiveness of mitigation actions

To monitor the effectiveness of the risk mitigation actions above, Thoughtworks rely on the close collaboration between different functions such as Procurement, Compliance, Legal, Recruitment and People (HR) to act as checks and balances against any risk of modern slavery contravention. We believe at this stage, the Procurement review process and close collaboration between the functions is commensurate with the low risk profile of our supply chain and operations. Should the risk assessment change, particularly if there is an introduction of a new high-risk supplier or when the nature of our procurement changes, we will consider whether there is a need to establish a more formal review process between the functions or additional mechanisms such as auditing of suppliers to monitor the effectiveness of the mitigations.

Process of consultation with owned, controlled, or section 14 entities

Thoughtworks Australia had no “owned, controlled or section 14 entities” during this reporting period.

Any other relevant information

In February 2023 (after the end of the relevant Reporting Period) Thoughtworks Australia closed the acquisition of a wholly owned subsidiary called ITOC Pty Ltd (ACN 156 344 811).

More information on this acquisition can be found in our press release [here](#).⁵ Due to the date of the acquisition, ITOC's operations will be detailed in Thoughtworks Australia's subsequent Modern Slavery Statement in the next reporting period.

On 20 September 2022, Thoughtworks New Zealand Limited 8470310 NZBN 9429050819928 (**Thoughtworks New Zealand**) was incorporated. Operations are yet to commence. Thoughtworks New Zealand is a wholly owned subsidiary of ThoughtWorks Holdings Limited Company No. 10451113, incorporated in the UK. While Thoughtworks New Zealand has the same board of directors as Thoughtworks Australia, the companies are not subsidiaries nor holding companies of one another. As a result, this statement does not address the very early practical operations of Thoughtworks New Zealand (which were, in any event, non-existent as at the end of the Reporting Period).

Board-level consultation and approval

This statement is made by Thoughtworks Australia Pty Ltd (ABN 99 088 279 761) as a *reporting entity* in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) covering the period from 1 January 2022 to 31 December 2022. This Statement has been circulated to the Board of Directors of Thoughtworks Australia for review and comment. The Board of Directors has approved this statement which is signed on their behalf by the Director designated below, as of 15 April 2023, and the information in this statement is accurate as at that date.

DocuSigned by:



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Karin Verloop

Managing Director

Thoughtworks Australia Pty Ltd

⁵ <https://www.thoughtworks.com/en-au/about-us/news/2023/thoughtworks-acquires-leading-australian-aws-consultancy--itoc-->