



Modern Slavery Statement

SYNERGY GROUP AUSTRALIA HOLDINGS PTY LTD
SYNERGY GROUP AUSTRALIA PTY LTD
SYNERGY GROUP LAW PTY LTD
THINKPLACE AUSTRALIA PTY LTD

16 DECEMBER 2024

Reporting Entities

This Modern Slavery Statement ("Statement") is made on behalf of Synergy Group Australia Holdings Pty Ltd (ABN 38 662 711 551), and the wholly owned subsidiaries Synergy Group Australia Pty Ltd (ABN 65 119 369 827) and Synergy Group Law Pty Ltd (ABN 27 654 575 569), and ThinkPlace Australia Pty Ltd (ABN28 673 168 244) (collectively "Synergy") for the financial year closing 30 June 2024. This is Synergy's third Modern Slavery statement, which is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth).

Our Statement

Synergy is a professional services firm operating across Australia which aims predominantly to uplift, shape, and enable the public and private sectors to anticipate and respond to both domestic and international challenges. Synergy has a rich history of excellence, innovation and expertise, providing full end-to-end services incorporating strategy, design and innovation through ThinkPlaceX, transformation delivery services through Synergy Consulting, and managed services through Synergy Managed Services.

Synergy is proud to be different, valuing each other's uniqueness. Synergy takes a proactive approach to seeking out challenges and embracing new perspectives.

Synergy's values have been considered and actively promoted and underpin what differentiates us from competitors. Synergy believes in being **honest to self and all**, doing as we say, acting with integrity and remaining true to ourselves and others. Synergy people share their successes, are generous and both internally and externally support others through having **abundance mentality**. Synergy's people are its stars - that's why at Synergy **it's personal**. Everyone is valued on their own terms with difference being a source of our strength. **Acting as one** through collaboration, we create impact as an integrated team. Synergy is **positively charged** by acting with confidence and resilience and believes that being optimistic leads to the best possible approach. Synergy seeks to **play with impact** by anticipating the most important challenges, positioning strategically, thinking critically, and solving in innovative ways.



PLAY WITH IMPACT

We anticipate the most important challenges, position strategically, think critically and solve in innovative ways.



ACT AS ONE

We collaborate to create impact and work together as an integrated team with each other and our clients



IT'S PERSONAL

Our people are our stars; we value everyone on their own terms with these differences being our source of strength



POSITIVELY CHARGED

We are confident, resilient and ever optimistic in our approach



VALUE FOR MONEY

We aim to keep our overheads low to ensure we maximise our value for money



A FLEXIBLE APPROACH

We are not tied to specific methodologies. We flex our approaches, depending on your needs.

These values demonstrate Synergy's commitment to eliminating modern slavery practices and describe how activities have and will be undertaken to mitigate risks of those practices in supply chains. For twenty-five years Synergy has prided itself as being a leader in the provision of Government professional services and is committed to supporting the *Modern Slavery Act 2018* (Cth). Synergy strongly supports governmental mechanisms aimed at addressing violations of human rights.

This Statement outlines Synergy's operations and supply chains, modern slavery risks, actions taken by Synergy in the reporting period (FY24), the effectiveness of those actions and the approach taken during our third reporting period. This Statement sets out the current state of operations and identifies areas of remediation and improvement.

This Statement is backed by Synergy's steadfast commitment to consistent and continuous improvement, and a willingness to recognise the risks in our current state and to undertake the necessary actions so as to minimise and mitigate those risks.

Organisational Structure, Operations and Supply Chain

Organisational Structure

Synergy Group Australia Holdings Pty Ltd, Synergy Group Australia Pty Ltd, Synergy Group Law Pty Ltd and ThinkPlace Australia Pty Ltd are managed centrally in Canberra. Essentially, these entities operate as one entity in similar industry sectors and are pragmatically controlled by the same board, share the same management, vendors and corporate functions including procurement, finance, information technology, human resources and legal. As such, this Statement is made on behalf of these entities.



Operations

Synergy operates across Australia with two offices in the ACT (Barton), one office in Victoria (Melbourne) and small serviced offices in Sydney and Brisbane, as well as staff working remotely from other locations. Synergy employed approximately 430 permanent staff and in the financial year ending 30 June 2024 met the threshold for reporting.

Synergy has nine separate business lines, alongside an enabling National Business Services branch. A brief description of each business line is below:

CFO: This capability has two services: CFO Advisory and CFO Professional. The CFO capability aims to be a strategic partner for Government agencies' Chief Finance Officers (CFOs) and business units.

A core capability of CFO is to provide financial management services to Government agencies. The CFO capability empowers CFOs through the timely provision of information and business insights.

Defence, Strategy and Industry: DS&I works within the Defence and National Security sector. The team is comprised of highly skilled policy experts, strategists, communicators, and capability planners. DS&I work with clients to apply expertise, analysis and ideas supporting decision-makers who deliver the right outcome to answer the needs of the current strategic environment.

Governance, Performance and Assurance: With over 40 multidisciplinary professionals who work across three core services: Performance and Governance, Organisational Resilience and Improvement and Audit. Governance, Performance and Assurance works with our clients to build trust, confidence, and certainty through robust and reliable advice, insights and foresights to strengthen an organisation's ability to create, protect and sustain value.

Program Design and Delivery: This service line is home to capabilities and professional career pathways for portfolio, program and project management and organisational change management. We are a leading delivery partner for government programs and projects in Defence and as well as other Federal Government agencies.

Synergy Digital: Synergy Digital has expertise across 8 core capabilities and alongside a highly skilled team, we bring both experience and a collaborative approach to each engagement. We focus on

aligning with our clients' goals, ensuring that each design choice optimises efficiency and long-term impact. By integrating strategic thinking with innovative design, we help our clients to achieve cost-effective digital transformations that offer exceptional value for money.

Synergy Law: This team works with clients by leaning into complex challenges to provide solutions and options to achieve intended outcomes in the most pragmatic, efficient, and effective way. The legal team provides specialised legal advisory services in areas of employment law, commercial law and administrative law. The Strategic Sourcing team works closely with Synergy Law and partners with Government to ensure procurements and broader contractual arrangements deliver the best business outcomes and value for money for the Commonwealth. *Synergy Managed Services:* Synergy Group's Managed Services unlock ICT potential with a comprehensive suite of integrated processes, supporting reliable and maintainable ICT services that are tailored to cater for their clients' unique challenges. They are committed to consistency and transparency, supported by rigorous governance and reporting. The core capabilities include:

- **Managed Services:** Synergy Group is an innovative and trusted delivery partner that manages and simplifies all aspects of customers' ICT solutions.
- **Client Delivery Services:** Synergy Group uses a robust system life cycle model that is aligned with PMBOK and PRINCE2 to deliver enhancements within managed services.
- **Automation:** Synergy Group offers expertise at every stage of the automation program. We deliver automated efficiencies via a major Robotic Process Automation (RPA) platform that results in cost reduction and better process outcome.
- **Security Services:** Synergy Group provides Security Services that are aligned with standard security frameworks. Security Services proactively reduce security threats and strengthen security posture.

ThinkPlaceX is an impact accelerator. They uncover complex challenges and apply intentional action to create a lasting positive impact. ThinkPlaceX brings in the voices of leading experts in 'what's shaping our world', from industry partners, community, State/Territory/Federal Government and Non-Government Organisation's via co-design and activate ecosystems through strategy and design.

Synergy's Clients

Synergy's key clients are Australian Commonwealth Government agencies, with the Commonwealth constituting the majority of Synergy's clientele. Synergy also provides services to state and territory governments, private sector businesses and not-for-profit organisations.

Suppliers

Location of Suppliers

In preparing our third Modern Slavery Statement (FY24), Synergy assessed Tier 1 suppliers with an expenditure equal to or more than \$1,000.. Synergy understands that Tier 1 suppliers are those with whom Synergy has a direct contract. Tier 2 suppliers are considered the suppliers of Synergy's key contractors and subcontractors, and Tier 3 suppliers are the subcontractors or contractors of the Tier 2 suppliers, etc.

99% of Synergy's Tier 1 suppliers are located domestically within Australia, with one Tier 1 supplier located in Singapore.

Synergy's investment in the domestic market, by sourcing suppliers locally, is reflective of the business and vision of Synergy, which is committed to the investment and interests of Australia.

Types of Suppliers

Synergy typically utilises a variety of Tier 1 suppliers. Synergy's major suppliers in terms of their proportion of cost of the reporting period, are in the following sectors:

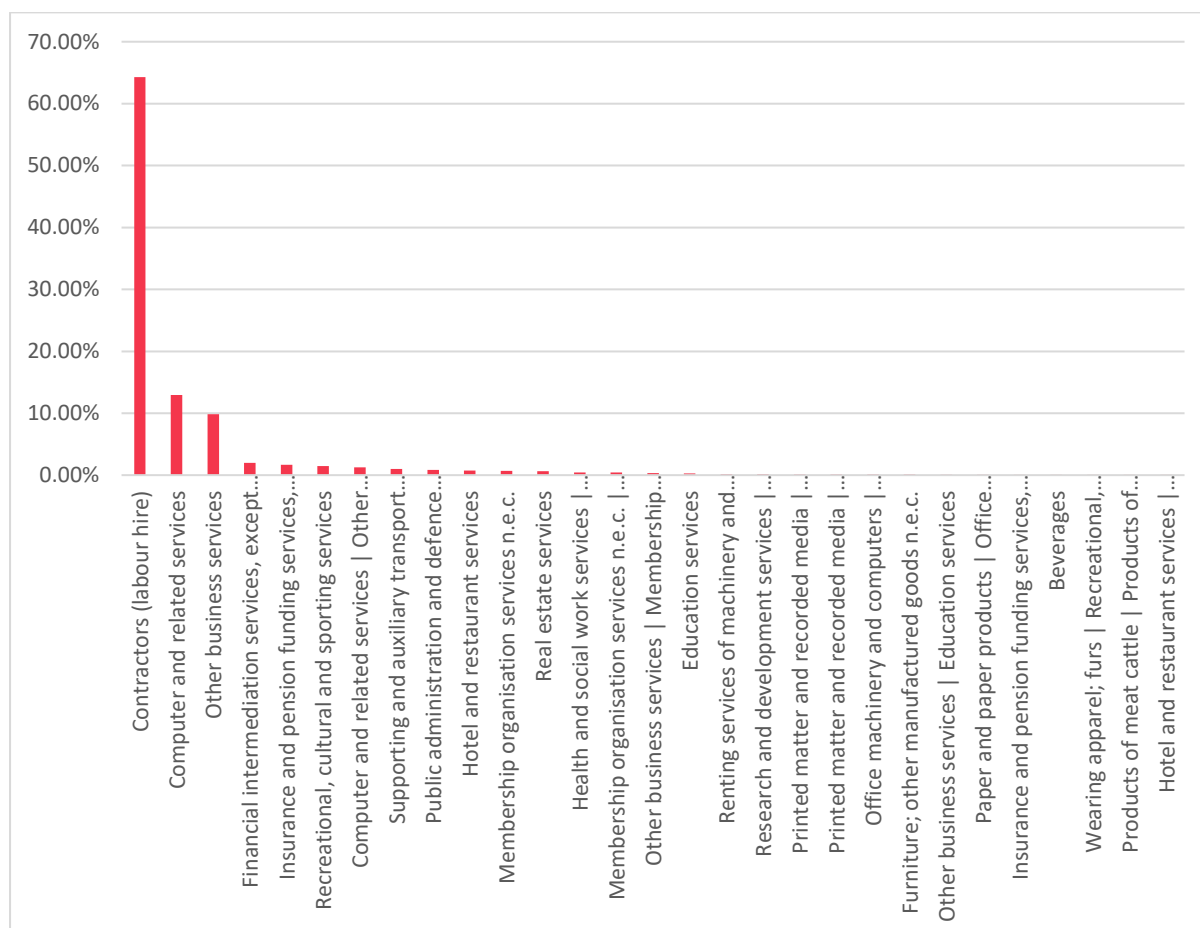


Figure 2: Synergy's approximate percentage of spend across supplier categories.

Risks

Background

Australia has a robust legislative framework criminalising trafficking of persons, slavery and slavery-like practices. Slavery-like practices include servitude, forced labour, and deceptive recruiting. Offences apply to public sphere exploitative labour practices and exploitation in the private sphere.

Australia's commitment to prevent slavery-like practices is reflected in legislation protecting victims of modern slavery. For example, victims of modern slavery may be protected under the vulnerable witness protection program (*Crimes Act 1914* (Cth)) and *Criminal Code Act* (1995)). Additionally, the *Migration Act 1958* (Cth) provides for offences for allowing persons to work in breach of visa conditions, as well as allowing victims who do not hold a valid visa to remain lawfully in Australia.



The *Modern Slavery Act 2018* (Cth) establishes a risk-based framework to target modern slavery practices in supply chains, further supporting Australia's commitment to prevent slavery-like practices.

Australia's laws relating to slavery offences have extraterritorial jurisdiction meaning that action may be brought against offenders whether or not they are Australian citizens, whether or not the victims are Australian citizens and whether or not the conduct occurred within or outside Australia.

Analysis of Synergy's Supply Chain

Sixty four percent of Synergy's supply chain expenditure is on independent contractors and labour hire. The assessed risk of modern slavery in this context is lower than in scenarios involving unskilled or migrant labour. Additionally, the contractors we engage are educated professionals, all holding Australian citizenship and a minimum baseline security clearance. Australia's strong legal framework, supported by robust labour laws, minimises the risk of exploitative practices in our operations.

In undertaking an assessment of its remaining supply chain, Synergy engaged Fair Supply, an ESG data provider consultancy firm, to assist with assessing Synergy's supply chain and mitigating our risk. We applied the initial risk assessment methodology to our suppliers. This baseline exercise provides the basis for our subsequent focus for ongoing due diligence and remediation activities across not only the present reporting period but for upcoming years.

Incorporating company spend data throughout global markets, we have utilised Fair Supply's proprietary technology to trace the economic inputs required to produce products and services sourced from Tier 1 suppliers to Tier 2 suppliers, Tier 2 suppliers to Tier 3 suppliers, and so on, all the way to Tier 10 suppliers of the supply chain of Synergy's top suppliers by spend.

This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using the following sources:

- a. The United Nations' (UN) System of National Accounts;
- b. UN COMTRADE databases;
- c. Eurostat databases;
- d. The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
- e. Numerous National Agencies including the Australian Bureau of Statistics.

The MRIO is then examined against the following international standards:

- a. The UN Guiding Principles on Business and Human Rights;
- b. The Global Slavery Index;
- c. International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
- d. The United States' Reports on International Child Labour and Forced Labour.

A proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier.

This analysis was performed for the purposes of risk identification under the Act. It does not purport to confirm the actual existence (or non-existence) of slavery in Synergy's supply chains and operations. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.

Of the 112 Tier 1 suppliers assessed, 13 were identified as a moderate low risk and 99 were identified as low risk. These ratings assess the severity of the risk of modern slavery in a company and its supply chains at the industry level. Synergy's overall modern slavery risk is assessed as low.

Our Actions and Approach

Approach and Action

Whilst instances of modern slavery practices were not identified in Synergy's operations and supply chain during this reporting period, Synergy will continue to diligently work with Fair Supply and our suppliers, to ensure that instances of modern slavery practices do not arise in future supply chains.

We will continue to issue a Modern Slavery supplier questionnaire to new suppliers. Results of the questionnaire enable Fair Supply to evaluate and score the company's efforts to address modern slavery risk, and then provide an adjusted risk rating, based on the company's Industry risk rating and risk mitigation score.

Synergy has developed a Modern Slavery Hub on our Intranet. It provides training modules, awareness, learning resources and a toolkit for staff. In November 2023, Synergy launched a new L&D platform with a mandatory Modern Slavery awareness module. Existing staff and contractors were required to complete the module and new staff and contractors must undertake it as part of their onboarding. The completion rate at the end of the reporting period was 97%.

Synergy implemented a Modern Slavery Policy applicable to Synergy, its controlled and related entities, and its suppliers. The Modern Slavery Policy is reviewed on an annual basis.

Synergy's National Business Services team is responsible for overseeing and implementing Synergy's commitment to eliminating and reducing the risk of modern slavery from its operations and supply chains. Additionally, the team is responsible for investigating, addressing and reporting on any potential modern slavery practices that may be associated with Synergy or its suppliers. The team is supported by key professionals with diverse experience across various fields, including human resources, finance, strategic sourcing, advisory, legal and assurance.

Continual Assessment of Effectiveness and Future Commitment

Synergy's Continual Assessment of Effectiveness

Synergy established a Modern Slavery Working Group tasked with the implementation of the Modern Slavery Policy and the development of associated procedures, including the compilation of resources to assist the Synergy community in meeting the objectives of the Modern Slavery Policy.

Synergy will assess the effectiveness of actions taken to mitigate modern slavery practices, including:

- the use, effectiveness, and ability to conduct due diligence processes and how these processes may be improved;

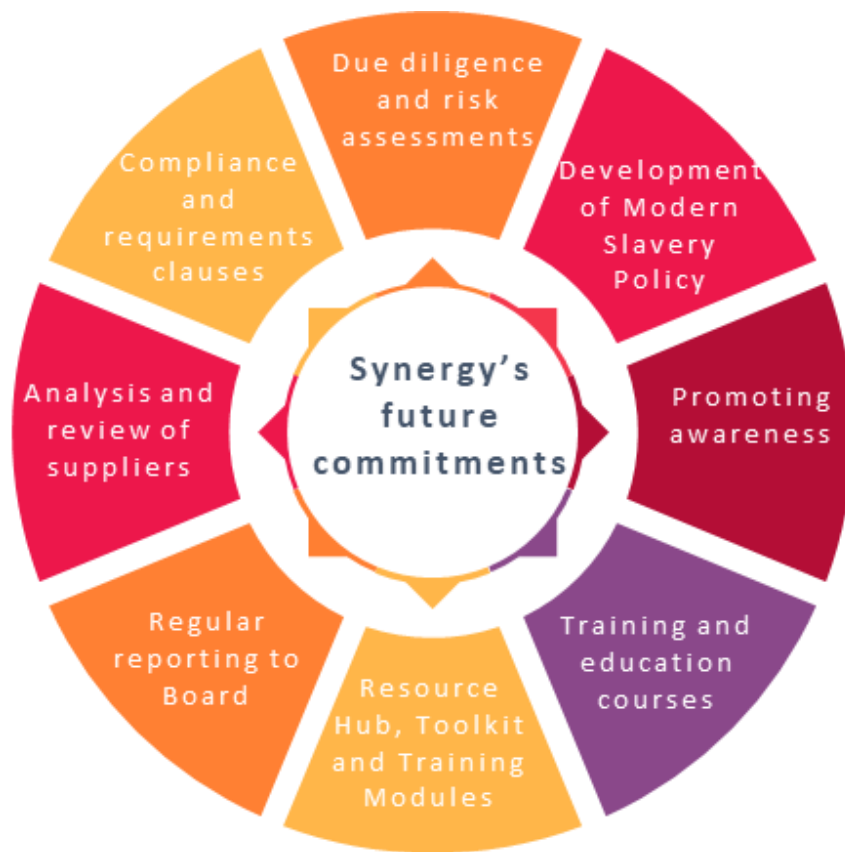
- the frequency of discussions around modern slavery in the workplace, including incidences where advice may be sought, or consideration is required.

Synergy will continue to conduct risk assessments related to modern slavery practices in its operations and supply chains and record identified risks in a register, the likelihood of occurrence and the potential consequence of the realisation of those risks, and how Synergy will manage those risks.

Synergy's work in this space is ongoing, and by committing to the continual monitoring of modern slavery risks and development of treatment actions and measures, Synergy will have an intrinsic ability to assess the effectiveness actions.

Synergy's Future Commitments

While in this reporting period our overall risk is assessed as 'low,' we understand that there are steps and actions we can take to improve and strengthen our awareness, accountability, and compliance. We are committed to reducing the risks of and eliminating modern slavery.



Synergy's Future Actions

In our previous statements we broke down the high-level framework provided above into 8 Actions for Synergy to complete in order to tackle modern slavery risks. These actions will improve our approach to assessing and mitigating the risk of modern slavery, as well as strengthening our compliance and accountability mechanisms. We continue to undertake action aimed at increasing awareness, designed to enhance the knowledge of both employees and suppliers, on the challenges and risks of modern slavery. Progress on the 8 action items is set out below:

#	Action	Progress
Action 1	The development and implementation of a synergy modern slavery-specific policy and procedure, as well as ensuring where applicable, the Synergy policies and procedures address the risks of modern slavery and endeavour to mitigate those risks.	Policy – completed Procedure – Drafted
Action 2	Working with suppliers, partners and stakeholders to conduct due diligence and risk assessments to ensure that the parties Synergy engages with are also committed to minimising the risk of modern slavery	Ongoing
Action 3	Promoting awareness of modern slavery through the implementation of training and the provision of materials such as templates and other tools to enable staff, as well as suppliers, partners and other stakeholders, to identify and respond to risks of modern slavery.	Implemented and ongoing
Action 4	The development of modern slavery compliance and requirement clauses for use in Synergy's contract templates and other agreements	Drafted
Action 5	Ensuring Synergy is held accountable for its commitments to eliminating modern slavery through regular reporting the Synergy board. Continue to engage and utilise the guidance materials provided and recommended by Australian Border Force and key international organisations	Ongoing
Action 6	Undertaking an in-depth analysis of Synergy's suppliers, including a review of the subsequent tiers of Synergy's operations and supply chain.	Completed
Action 7	Synergy will be instructing partners and key employees to undertake training and education courses, which are publicly available, in order to increase their own understanding and awareness of modern slavery in our organisation's operations and supply chains.	Completed
Action 8	Synergy will develop its own suite of Modern Slavery Training Modules, an internal Modern Slavery Hub and Modern Slavery Toolkit. These resources will be available and promoted to all members of Synergy, in order to further our commitment to reducing the risk of Modern slavery in Synergy	Completed

Figure 2: Synergy's Commitments

Consultation and Approval

Consultation process

This Statement was prepared by the Synergy National Business Services team, with in depth consultation being undertaken with senior leadership and board members of Synergy entities prior to preparation.

Approval

This Statement was approved by boards of Synergy Group Australia Holdings Pty Ltd, Synergy Group Australia Pty Ltd and Synergy Group Law Pty Ltd and ThinkPlace Australia Pty Ltd on 16 December 2024.

EXECUTED by Synergy Group Australia Holdings Pty Ltd, Synergy Group Australia Pty Ltd, Synergy Group Law Pty Ltd and ThinkPlace Australia Pty Ltd:



Signature

Rob Kennedy
Director

16 December 2024
Date



Signature

Mark Pattrick
Director

16 December 2024
Date