

Modern Slavery Statement

Persol Australia Holdings Pty Ltd

March 2021

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Programmed Maintenance Services Limited | ABN 61 054 742 264

Our Business

Great work, takes great people

Our Vision

Slavery, servitude, forced labour and human trafficking represent a grave human rights abuse. Persol Australia Holdings Pty Ltd ACN 620 794 130 and its subsidiaries (Programmed) are committed to building and fostering a culture in which diversity is valued and to providing a workplace that is safe and respectful. This means that Programmed employees must treat other employees, customers and suppliers and other people with trust, dignity, respect and fairness.

Programmed recognises the inherent dignity of its staff and each persons' equal and inalienable right to freedom, justice and fair work conditions. Programmed does not tolerate any form of modern slavery in any part of its business.

Programmed is committed to eradicating all instances of modern slavery within its business and will continue to encourage its clients, suppliers and staff to be aware of, and take action against, instances of modern slavery within our community.

This Statement sets out the steps that Programmed has taken to ensure that modern slavery does not occur within its business or supply chain, operating in accordance with the requirements of the modern slavery Act 2018 (Cth) (Act).

A message from our Managing Director

At Programmed, we continue to be committed to respecting human rights across all areas of our business and ensuring that modern slavery is eradicated from our supply chain.

Our people are central not only to our business but also to our success and as a company we value and respect them. We consider the Programmed community to include not just our people, but also our clients, suppliers and subcontractors.

As a company, we have taken steps to ensure that our stakeholders are aware of the incredible efforts that we undertake to deliver our services in the most ethical, sustainable and responsible way possible and to encourage them to join us on this journey.

Programmed is excited to be part of a community that is contributing to the eradication of modern slavery.

A handwritten signature in white ink that reads "G. Thompson". The signature is written in a cursive, slightly slanted style.

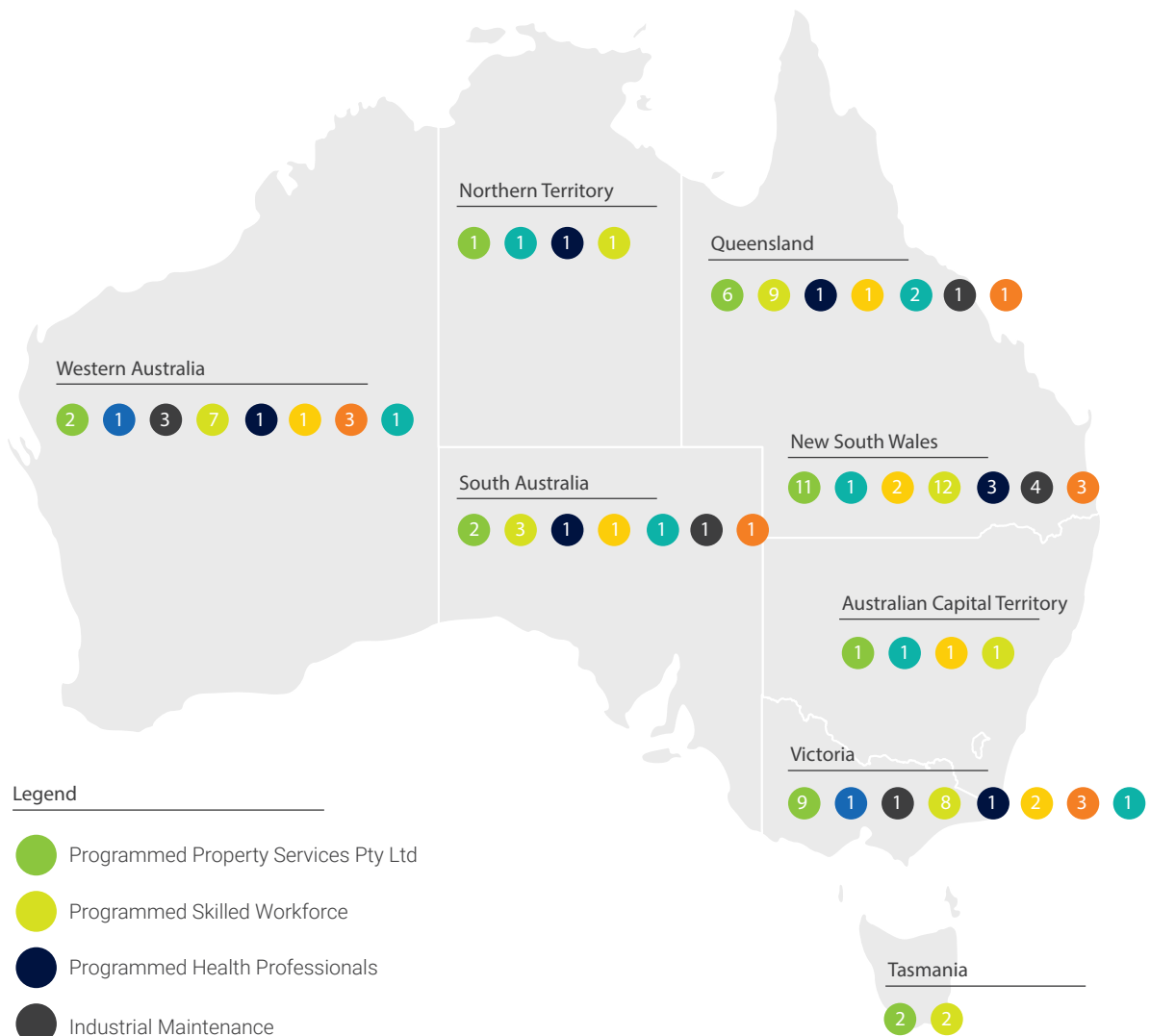
Managing Director and Group CEO

Our Business Structure and Operations

Programmed is a leading provider of operations and maintenance services across all industry sectors including education, health, infrastructure, manufacturing, transport and mining in Australia and New Zealand. We directly employ more than 25,000 people across a broad range of industries to provide services for more than 10,000 customers, often under long-term contracts. Its business model is built around Programmed's ability to recruit, deploy, manage and maintain a large directly employed workforce of professional, skilled and semi-skilled staff with a wide range of capabilities.

All of Programmed's employees value safety and continually contribute to its goal of Zero Harm. Programmed is committed to providing innovative solutions to its customers that improve business success and its people align themselves to its core values of personal safety leadership, care and empathy, customer service, and diversity, inclusion and equality.

Programmed does not engage in manufacturing and therefore does not supply chain concerns in this area. As such, Programmed has more visibility over its subcontractors and suppliers which minimise the risk of modern slavery occurring.



Legend

- Programmed Property Services Pty Ltd
- Programmed Skilled Workforce
- Programmed Health Professionals
- Industrial Maintenance
- Programmed facility management
- PERSOLKELLY
- Programmed Electrical technologies
- Corporate

25,000 +

employment across a broad range of industries

Providing services to more than

10,000 Customers



Programmed's employees value safety

Our Brands

Programmed Key Businesses include:



Facility Management

Facility Management: Asset management, facility maintenance



Maintenance

- ✓ **Property Services:** Painting, signage and grounds and building projects
 - ✓ **Turnpoint:** Construction and maintenance services to the golf and horse racing industries
 - ✓ **Programmed Electrical Technologies:** Design, installation and maintenance services for electrical, audio visual and communications services
 - ✓ **Essential Services:** Multi-disciplined essential services maintenance works
 - ✓ **Industrial Maintenance:** Maintenance, shutdowns and project works to heavy industrial and hazardous sites
-



Health

Health Professionals: Healthcare recruitment services, home care and nursing services



Staffing

- ✓ **Skilled Workforce:** Managed labour, staffing and training services
- ✓ **Professionals:** Workforce and recruitment solutions to match talented individuals with the right cultural fit
- ✓ **Training Services:** Build capacity, increase performance and create a culture of learning within customer organisations

Our Potential Risks

Programmed recognises the inherent dignity of our staff and the people working in our supply chain and each person's equal and inalienable right to freedom, justice and fair work conditions. Programmed does not tolerate any form of modern slavery or human trafficking in any part of our business or supply chain. Programmed has a code of conduct which notes Programmed's commitment to protecting people against modern slavery.

Programmed is committed to ensuring that all parties it engages with are aware they must abide by the Act. Programmed has included relevant warranties in its terms and conditions requiring its suppliers to comply with the Act and verify that their own supply chain meets the Act's requirements. Programmed has also undertaken a review of all internal documents to ensure that, where relevant, they consider and make reference to the Act.

By ensuring that all subcontractors and suppliers are made aware of Programmed's policies and procedures during the on-boarding process, Programmed can take comfort that its obligations under the Act are met and that the companies which are performing work for Programmed are committed to assisting Programmed in its vision to diminish modern slavery.

Additionally, Programmed uses its best endeavors to ensure that all parties it engages hold the appropriate licenses and comply with all regulations. As such, Programmed considers that the risk of modern slavery occurring is low.

As at the date of this statement, Programmed has not discovered any cases of modern slavery across our supply chain, either with our operations or suppliers. No form of modern slavery is knowingly used in Programmed's business, by its directors, officers, employees, agents, representatives, contractors or subcontractors.

However, Programmed is aware that identifying and addressing issues of modern slavery is an ongoing project as modern slavery can occur in every industry and sector with severe consequences for victims.

“Identifying and addressing issues of modern slavery is an ongoing project.”

Given this, Programmed is committed to continuous observation and improvement to its supply chain. Programmed have identified several high risk supply categories for further review in 2021 (as noted in the table below).

Country	Modern Slavery Risks Indicators	High Risk Supply
Australia	<ul style="list-style-type: none"> • Servitude • Debt bondage • Child labour • Deceptive recruitment practices • Forced labour 	<ul style="list-style-type: none"> • Cleaning Services • Security Services • Uniform & PPE manufacturing • Office Consumables Supply • Electrical components Supply • Grounds Equipment Supply • Tools Supply
New Zealand	<ul style="list-style-type: none"> • Servitude • Debt bondage • Child labour • Deceptive recruitment practices • Forced labour 	<ul style="list-style-type: none"> • Cleaning Services • Security Services • Uniform & PPE manufacturing • Office Consumables Supply • Electrical components Supply • Grounds Equipment Supply • Tools Supply

Our Actions

Throughout 2020, Programmed has taken steps to continue towards its goal of the eradication of modern slavery in its supply chain. These actions have included;

- reviewing and revising its terms of supply
- implementing a training program across the Programmed business;
- implementing a review of all relevant internal policies;
- issuing questionnaires to its suppliers; and
- introducing an audit program to ensure ongoing compliance with the Act.

Programmed will build on these action items further in 2021 as a standard enterprise resource planning (ERP) platform (being Dynamics 365) continues to be rolled out across the Programmed business. The consolidation of Programmed's ERP systems will provide the business with improved visibility of its supply chain as well as enhance future supplier collaboration.

Terms of Supply

As part of its modern slavery eradication program, Programmed has committed to ensuring that all parties it engages are aware that they must comply with the Act. For example, Programmed has included various warranties in its terms and conditions requiring its suppliers to abide by the Act and verify that their own supply chain meets the Act's requirements. Programmed has also undertaken a review of all internal documents, including all terms and conditions used by the various arms of the business to ensure that, where relevant, they make reference to, and ensure compliance with, the Act.

Training Program

Programmed has rolled out modern slavery training for all of its 25,000 staff across the entire business so that all employees appreciate the importance of the eradication of modern slavery. This training program helps to educate those who may be unaware of what modern slavery is and give them the tools to know what do to about it when they see instances of modern slavery on site.

Training is undertaken in various forms including by way of tool box talks, webinars and formal presentations. These training programs will continue to be updated and reviewed as more information becomes available on modern slavery and the knowledge base and awareness of Programmed's employees increases.

Our Policies

As part of its commitment to continuous improvement, Programmed will continue to develop its codes of practice, procedures, requirements, risk assessment and monitoring frameworks that operate concurrently to ensure the eradication of modern slavery within its supply chain. Programmed will continue to evolve its procurement practices to ensure its suppliers comply with all requirements of the Act and contribute to the eradication of modern slavery.

Programmed is committed to implementing policies and procedures that meets its moral and ethical obligations to end modern slavery, including requiring all subcontractors and suppliers to comply with the terms of the Act. Programmed requires each of its suppliers to adhere to Programmed's supplier requirements, which mandate that suppliers will not use child labour, forced labour or involuntary labour.

Programmed has a central procurement policy which includes a key focus on the mitigation of risk, compliance with all regulatory requirements as well as a requirement to act fairly, ethically and responsibly when procuring goods and services.

We have a range of various policies and handbooks across our business that makes reference to our commitment to eradicating modern slavery and to our modern slavery Statement. These documents also set out the expectations that Programmed has of its suppliers.

The following documents support Programmed's commitment to the eradication of modern slavery:

- Code of Conduct;
- Industrial Relations Policy;
- Diversity and Inclusion Policy;
- Whistle-blower Policy;
- Equal Opportunity Policy;
- Subcontractor Handbook; and
- All terms and conditions used by the various Programmed entities.

“We have a range of policies and handbooks across our business that makes reference to our commitment to eradicating modern slavery.”

Supplier Questionnaires

Programmed's supplier on-boarding questionnaire includes a number of questions to assess initial modern slavery risks, however, we acknowledge that further investigation is required to meet ongoing modern slavery reporting and continuous improvement requirements. The questions are as follows:

Business Ethics and Related Parties

- Do you comply with international labour organisation (ILO) conventions against child labour?
- Can your business confirm there is no forced or compulsory labour used to provide these services?

Industrial Relations and Employment Matters

- Do all employees have the right to work in Australia or New Zealand (as applicable)?
- Has all employee remuneration due to workers under Awards, Agreements and Standards been paid?
- Have all staff entitlements and accruals in relation to leave entitlements been provisioned?
- Is the business registered and making contributions as and when due to the long service leave fund?
- Has the business made all payments due under the SGC (Superannuation) by the due date?

Programmed's existing modern slavery investigatory methods will be complimented by implementing the Property Council of Australia's (PCA) supplier platform. This platform provides modern slavery risk ratings calculation which follow the United Nations Environment Programme guidelines for Social Life Cycle Assessment. This is an ISO standardised framework for the assessment of social and environmental impacts of goods, services and organisations.

The Risk Assessment Methodology:

Programmed's procurement database was screened for five social risk categories: labour rights and decent work, health and safety, human rights, governance and community infrastructure (see figure below). These risks were obtained from the Social Hotspot Database (SHDB), which indicates the likelihood of an issue occurring in different industries and countries. Within these social risk categories are subcategories directly relating to modern slavery such as child labour, forced labour, excessive working time, safe working conditions, exploitation of migrant labour and general human rights and governance.

Assessment of Risk:

When a potential Programmed supplier completes the supplier detail questions in Programmed's supplier platform, they are asked to indicate their industry category and the location of their operations. Based on this information provided, the supplier is given a risk rating. The risk rating is informed by the risk analysis from the SHDB. If a supplier doesn't identify with any of the preprogramed categories or countries, a generic conservative rating will be given.

Once the supplier has completed the supplier detail questions, they go on to complete the modern slavery questionnaire. The questions that they are asked (being either a low-medium risk or a high-risk questionnaire) are dependent on the supplier’s risk rating, and on other information that the supplier has provided to the Programmed procurement team.

The process is outlined as follows:



Audit Program

This modern slavery statement, together with Programmed's Code of Conduct, form part of the certified Integrated Management System which is subject to external audit for compliance with ISO 9001:2015. It provides the framework for Programmed to prevent and eliminate modern slavery and human trafficking in its business and supply chain through the following:

- regularly undertaking an assessment of operations and supply chains to identify risks of modern slavery and human trafficking taking place;
- where risks are identified, developing a management plan to remove those risks;
- requiring Programmed's suppliers and subcontractors to sign standard terms and conditions which require them to support Programmed in meeting our legal, ethical and moral obligations;
- as part of Programmed's regular review of subcontractor performance, testing the effectiveness of steps to eliminate modern slavery practices; and
- requiring all staff to undertake training on modern slavery and human trafficking risks.

The PCA platform provides an initial indication of supplier risk so that further questions can be asked by Programmed to assess the risk of modern slavery. This platform will provide a means to monitor and evaluate responses from high risk suppliers by Programmed.

Assessing our Actions

Our 2020 Milestones

Programmed has cultivated a highly unique and values-driven culture that is demonstrated at every level of its operations. Our values in care and empathy, diversity, inclusion and equality, customer service and personal safety leadership are evident in our behaviour and the way we interact and serve the varied and numerous communities in which we work.

Programmed is committed to eradicating all instances of modern slavery within its business and will continue to encourage its clients, suppliers and employees to be aware of, call out and eradicate instances of modern slavery within the Programmed community.

Programmed has implemented the following actions to support modern slavery awareness across its supply chain in 2020:

Completed
<p>✓ There has been an overhaul of Programmed’s terms and conditions, including its Terms of Supply to reflect modern slavery provisions and incorporate the requirements of the Act. The Terms of Supply are a mandatory requirement for all suppliers when undertaking the Programmed supplier on-boarding process.</p>
<p>✓ Programmed has revised its Master Services Agreement to reflect modern slavery provisions and incorporate the requirements of the Act.</p>
<p>✓ A complete review of Programmed’s internal policies to ensure its responsibilities and expectations in respect of modern slavery are clear and are actively communicated to those who work for, or on behalf of, Programmed</p>
<p>✓ Programmed’s Code of Conduct has been amended to address modern slavery risks. This document is for both internal and external use.</p>
<p>✓ Programmed has developed and implemented internal training for its employees which is available via Programmed’s online training library.</p>
<p>✓ Programmed has identified outside partners that can assist with modern slavery audit, reporting and ongoing management requirements.</p>
<p>✓ Determined high risk categories for initial review.</p>

Improvements

Programmed is committed to implementing policies and procedures that meets its moral and ethical obligations to end modern slavery, including requiring all subcontractors and suppliers to comply with the terms of the Act. Programmed requires each supplier to adhere to its standard supplier requirements which mandate that suppliers will not use child labour, forced labour or involuntary labour.

Programmed has a central procurement policy which includes a key focus on the mitigation of risk, compliance with regulatory requirements as well as acting fairly, ethically and responsibly when procuring goods and services.

As part of Programmed's commitment to continuous improvement, Programmed will keep developing the codes of practices, procedures, requirements, risk assessment and monitoring frameworks that address the issues of modern slavery. Programmed will continue to evolve its procurement practices to ensure suppliers comply with all requirements of the Act and are committed to the eradication of modern slavery.

Programmed have identified the following business improvements which will be implemented in 2021 to support the existing efforts to eradicate modern slavery practices across its supply chain.

Ongoing Improvements 2021
✓ Programmed will continue to roll-out its ERP platform (Dynamics 365) to complete re-onboarding of suppliers across the business.
✓ Programmed will implement the PCA supplier platform to support the audit of potentially high-risk suppliers.
✓ Programmed will develop and roll-out mandatory training for suppliers.
✓ Programmed will implement internal training for ALL employees via the online training library.
✓ Programmed will review and update the subcontractor handbook used by Programmed's numerous subcontracts to include modern slavery provisions and make reference to the requirements of the Act.
✓ Programmed will add modern slavery issues to the existing whistle-blower hotline program accessible to employees and suppliers.
✓ Programmed will undertake a further review of procurement categories to identify high-risk indicators of modern slavery practices (i.e. business sector, employment practices, etc).

Thank you for reading the Modern Slavery Statement

If you have any questions about the information
contained in this statement, please contact at:
companysecretary@programmed.com.au
