

## INTRODUCTION

Chandler Macleod Group (CMG) and its related companies including:

- AHS Services Group Pty Ltd ("AHS")
- Aurion Corporation Pty Ltd ("Aurion")
- Chandler Macleod Managed Training Services ("MTS")
- Chandler Macleod People Insights Pty Ltd ("CMPI")
- Chandler Macleod x-PO Talent Solutions ("Talent Solutions")
- Leaders IT Services Pty Ltd ("Leaders IT")
- OCG Consulting ("OCG")
- Peoplebank Group Limited ("PBG")
- Porterallen Pty Ltd ("PA")
- Vivir Healthcare Pty Ltd ("VIVIR")

is one of Australia's largest providers of human resources and talent solutions, with employees across four countries including Australia, New-Zealand and Asia. We have more than 35 offices across Australasia, with 870 employees and we have over 12,000 candidates placed in various locations around the globe.

We are committed to respecting internationally proclaimed human rights and fair labour practices and we recognise the key responsibility we have within the supply chain of providing skilled labour and professionals, to ensure that all individuals sourced, procured or engaged are treated fairly, ethically and in compliance with legislative requirements. Our standard practices are designed to protect Human Rights throughout the recruitment, selection and placement cycle.

***We believe that forced labour has no place in our operations or supply chains and that business and governments need to work together to make progress on this complex issue.***

According to the International Labour Organization (ILO), the term modern slavery covers a set of legal concepts, including forced labour, debt bondage, and human trafficking.

CMG does not tolerate slavery, human trafficking, forced or child labour or child exploitation of any kind and we have a suite of policies, procedures and practices in place, which assist us in managing human rights, promoting diversity and ensuring compliance with legislation.

Our **Human Rights Workplace Statement** outlines our commitment to providing a healthy and safe workplace where mutual respect is key, discrimination isn't tolerated and the rights of our people and those that we impact and interact with, are protected.

# Modern Slavery Statement 2021



Our **Supplier Engagement Policy**, outlines our commitment to the UN Guiding Principles on Business and Human Rights and outlines the principles that guide our business and that we expect suppliers to comply with, should they wish to do business with CMG.

The **Code of Conduct** outlines our zero tolerance for discrimination, harassment, workplace violence, bullying, child and forced labour within our business, our supply chain, the businesses of our Clients and their supply chains. Our Code provides a compliance hotline for employees to inform on an anonymous basis any concerns (including Human Rights).

Our **Whistleblowing Policy** provides further guidance to all of our people in relation to the behaviours we expect and outlines the mechanisms available for the reporting of behaviour or practices that are inconsistent with this.

In addition to the Policies mentioned above, our comprehensive people and human rights focused policy suite include:

- CMG OHS Commitment
- CMG Environmental Commitment (Statement)
- Sponsorship Policy
- Anti-Bullying Policy
- Discipline & Misconduct Policy
- Flexible Work Arrangements Policy
- Leave Policy / Parental Leave Policy
- Recruitment and Selection Policy
- Workplace Diversity Policy
- Risk Management Policy
- Grievance Policy

## OUR APPROACH TO MANAGING MODERN SLAVERY RISKS:

As well as ensuring the Chandler Macleod Group policies and procedures (as set out in the Employee Handbook) are communicated, understood and complied with, we ensure that:

- All our legal obligations are complied with in the recruitment and on-boarding process;
- We have a range of employment engagement methods depending on the needs of our clients but in all cases, individuals are free to apply for work, free to turn down an offer of work and free to leave work at any time.
- We do not charge any fees to individuals for the sourcing of the employment opportunities they are offered.
- Our employment conditions adhere to the legislation relevant to the jurisdiction in which we operate. In cases where our policies and practices provide greater advantage to an individual, this will take precedence.

# Modern Slavery Statement 2021



- We ensure that an individual's right to work in the country within which they will work is confirmed; We do this by confirming details with the relevant department within the country that the individual will work;
- Every single worker is provided with a copy of the terms and conditions of their engagement including rates of pay, hours worked and entitlements.
- We do not supply accommodation directly for our employees – our employees need to seek their own accommodation arrangements however we do conduct risk assessments of host employers where accommodation is supplied through an employment arrangement. During this audit, we review the living arrangements and conditions (including ease of movement, safety, hygiene and reasonableness of the environment).
- The results of these audits are documented in our safety systems and our Candidate Relationship Management system. These audits are conducted prior to initial placement of candidates and then every 2 years there-after (or more frequently if applicable).
- Our Candidate Relationship Management systems have controls in place that prevent placements from occurring without the appropriate work rights and skills checks being completed. These controls are also used to manage the expiring of working rights and professional accreditations/memberships for continuing placements of staff.
- We provide ongoing training for our people within Chandler Macleod who are responsible for sourcing and placing candidates and those in Human Resources related roles as well as our corporate teams who are responsible for sourcing.

This 2021 statement assesses our risk, outlines our efforts, and sets commitments for the coming year.

## SUPPLIER RISK MANAGEMENT

In FY 19, CMG established an internal Modern Slavery Working Group (MSWG) to develop our Modern Slavery Framework which includes the following:

- Client & Supplier Due Diligence Questionnaire
- Modern Slavery Risk Assessment tools
- Modern Slavery Training
- Modern Slavery Statement

We have adopted a risk based approach to managing any potential modern slavery vulnerabilities within our business and our Supply Chain. Whilst we consider the risk of modern slavery within our direct business operations to be low, we do recognise that through our supply chain and our client engagements we can be exposed to the risk of modern slavery and human trafficking.

We have used available internal resources, external published sources and feedback from organisations, such as the International Labour Organisation, to inform our risk assessment approach.

# Modern Slavery Statement 2021



## KEY INDICATORS IDENTIFIED

Within our supply chain, the following have been identified as the key indicators of Modern Slavery Risks:



Where multiple high risk indicators co-exist, there is a higher likelihood of modern slavery and additional controls are required to ensure these risks do not become reality.

Further complicating the risk likelihood, is the fact that within the supply chain, we have identified cross over from one sector to another. Given this, we have made the decision to focus on the following sectors within our supply chain, which we consider to potentially carry a higher risk for Modern Slavery:

- Food services, catering and hospitality
- Clothing and uniform manufacturing
- Warehousing and Distribution
- Stationary Wholesalers
- Commercial Cleaning
- Partner labour hire suppliers.

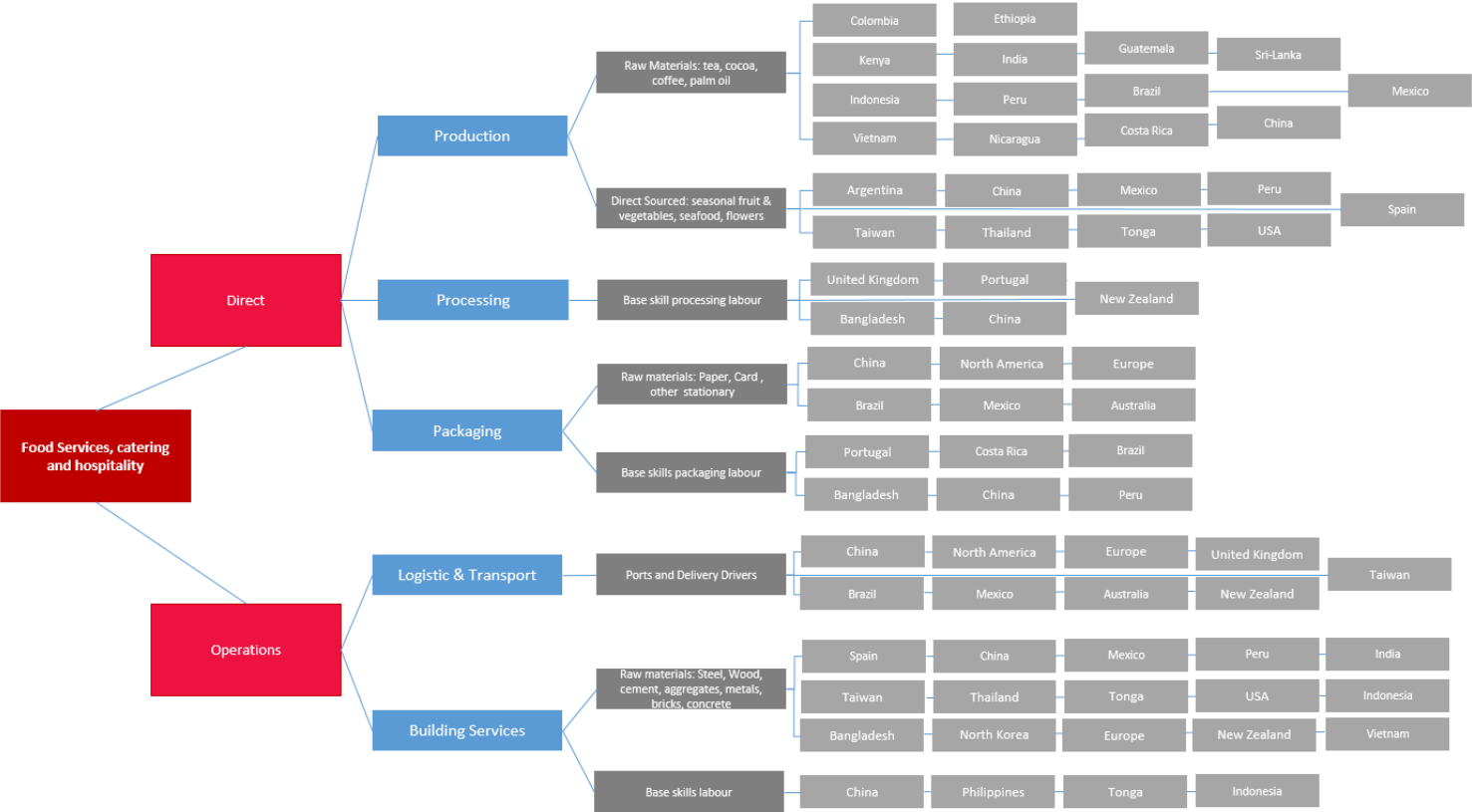
Our decision to select these industries is based on the need for these industries to enhance their responses to Modern Slavery in general so that requirements similar to those outlined in Australian Labour Hire and Fair Work legislation (for example) are considered “the standard” for these industries.

# Modern Slavery Statement 2021



## SUPPLY CHAIN MAPPING:

Our supply chain mapping is focussed on these high-risk industries. As we increase our understanding and level of traceability, we will work closely with our supply partners to better understand the specific supply risks within their downstream supply chains. *(Sample of our mapping below)*



# Modern Slavery Statement 2021



## SUPPLIER RISK ASSESSMENT AND DUE DILIGENCE

To identify, prevent and mitigate actual and potential adverse modern slavery risks and impacts within our supply chains, we have introduced a Supplier Modern Slavery Risk Assessment.

Although we expect our suppliers to identify and manage their own Modern Slavery risks in accordance with Modern Slavery legislation, we intend on conducting audits of our supply chain regularly and have commenced an audit this year of more than 70 of our existing tier 1 suppliers.

We are targeting the following areas in our audit:

- Recruitment practices
- Forced /Child Labour
- Debt Bondage
- Fair Wages & Conditions
- Termination of employment

## OUR COMMITMENT AND LOOKING FORWARD:

The results of our Supplier Modern Slavery Risk Assessment have form the basis of the following actions for our business over the next 12 to 18 months:

- Maturing our policies and procedures to ensure these have a robust and consistent focus on human rights and Modern Slavery
- Improving and expanding our engagement with our Suppliers and their supply chains with regards to human rights and modern slavery; (Including updates to contracts for supply as these approach renewal).
- Launching our preferred supplier program
- Enhancing our training to build greater awareness across our business and our suppliers about the more hidden indicators of modern slavery.

# Modern Slavery Statement 2021



## CEO STATEMENT



The leadership team of the Chandler Macleod Group strongly oppose the use of modern slavery in business and believe that the spirit and requirements of the Modern Slavery Act align with our Group's values.

I am confident the measures detailed in our statement, combined with the Chandler Macleod Group's vision, purpose and values, provide a strong framework for reducing the risk of modern slavery practices in our supply chains and operations.

### Statement of Approval

Chandler Macleod Group Limited and its subsidiaries, are managed by the same core team comprising of Chief Executive Officer and Chief Financial Officer who has kept and continue to keep the board informed of the reporting requirements and actions taken including our future goals and commitments.

This statement was approved by the Board on behalf of each of the Chandler Macleod Group entities on 6<sup>th</sup> May 2021.

Signed,

A handwritten signature in black ink that reads 'Peter Acheson'. The signature is written in a cursive, flowing style.

Peter Acheson, CEO & Director.