



Modern Slavery Statement

2024

AKG Global CEO Message

AKG Global's purpose is to empower the people and communities we work with every day. As an organisation we are committed to the elimination of modern slavery in all its forms.

This is AKG Global's second Modern Slavery Statement. Based on our analysis and reflection over the last 12 months, we have identified key areas where we have made further improvements and enhancements to our anti-modern slavery framework.

These areas are fundamental to our organisation's development as we continue to build upon and strengthen our commitment to addressing and mitigating modern slavery exposure. While we understand our business represents lower risk in the services sector in which we operate, we have identified areas of risk in which we seek to achieve progress over the coming year, including:

- Establishing improved Governance frameworks that are responsive to modern slavery risks facing our organisation;
- Improving our Supply Chain assessment and management practices;
- Reviewing and updating our operations and corporate policies;
- Further progressing our supplier assessments and developing a Supplier Code of Conduct;
- Reviewing our global activities across the group and improving our consultation;
- Establishing internal modern slavery reporting (including incident reporting); and
- Implementing a new staff learning management system to enhance staff modern slavery training, awareness, and education.

I am pleased to present this Statement which was approved by the AKG Board on 6 December 2024.



Duncan Angus, AKG Global CEO

Key Developments in FY24

- Onboarding a Learning Management System to provide training to our staff on understanding and identifying the risks of modern slavery in our business.
- Further developing our 2024/2025 Action Plan.
- Completing a review of over 60 of our key suppliers.
- Reviewing operational policies and identifying changes to further enhance compliance with AKG Global's intention to identify and eliminate modern slavery from our supply chains.

Priorities for FY25

- Rolling out the new modern slavery training to employees across AKG Global.
- Implementing our proposed amendments to our operational policies.
- Conducting a targeted enhanced review of supplies operating within higher-risk industries.
- Developing a Supplier Code of Conduct.



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1. Introduction

AngusKnight Pty Limited ACN 076 749 605 (AKG) is a private company registered in Australia and its global controlled entities are named in Attachment A (AKG Global).

This Modern Slavery Statement (the Statement) is made in accordance with the Australian *Modern Slavery Act 2018*. It also recognises and accords with similar requirements within our international operations, including: United Kingdom *Modern Slavery Act, 2015*, Canada – *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023*, Singapore – *Prevention of Human Trafficking Act 2014* and guidelines within the European Union – *On due diligence for EU businesses to address the risk of forced labour in their operations and supply chains*, applying to our operations in Sweden and Italy.

This Statement is made by AKG and all its controlled entities in Australia. Where required, AKG's overseas entities have provided a modern slavery statement in compliance with local laws.

The Modern Slavery Statement for the Jobs 22 business can be found [here](#).

We recognise that modern slavery can exist in many forms through coercion, threats, or deception in order to exploit individuals and deprive them of their human rights and freedoms. This can include slavery, servitude, human trafficking, child labour, debt bondage and forced labour practices.

This is AKG's second Australian Statement which recognises our continued commitment to identifying and removing modern slavery from our operations and supply chain activities. It provides a commitment to continuous improvement, enhancing our risk management approach and sets out our approach and actions to manage modern slavery risks in our global operations and supply chains through 2025.



In previous years, we established formal governance processes to assess, review and enhance our management of modern slavery risks. This includes establishing a Modern Slavery Working Group (Committee) comprising executives from across corporate and AKG's entities, regular AKG Board compliance and reporting, and enhancement to AKG's internal consultation and policy alignment.

The focus of this reporting period was to build upon and further develop our effective governance framework, understand risks associated with existing supply chains, staff training and further develop a program of actions (the 2024/2025 Action Plan).

2. About AKG Global

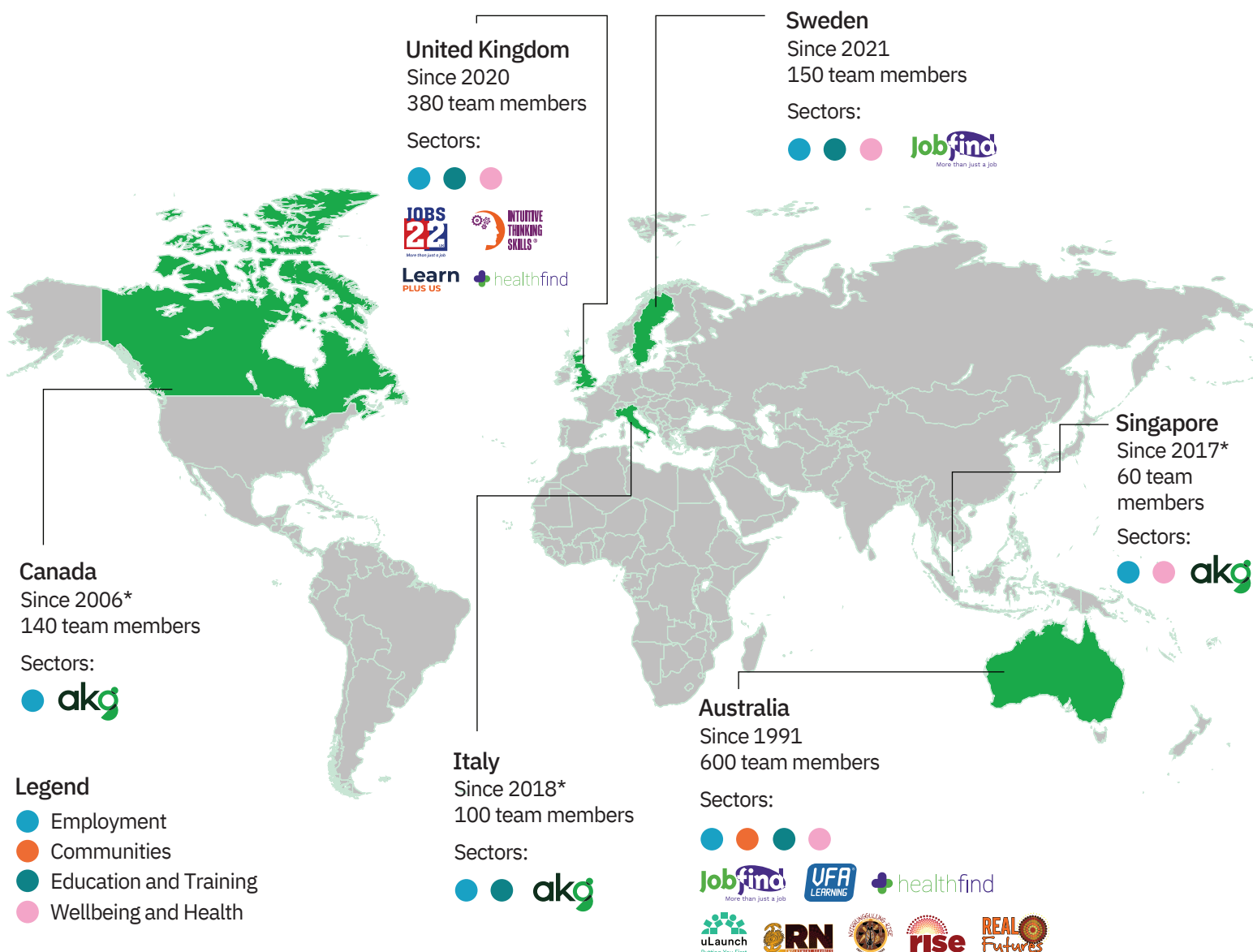
AKG Global is a group of global companies controlled by AKG working together to empower individuals, organisations and communities through innovative employment, training, and community solutions.

AKG Global operates in more than 300 locations in Australia, Canada, Italy, Singapore, Sweden, and the UK, servicing diverse markets across the government, corporate, First Nations and community sectors. AKG Global combines customer-focused insights with productivity prowess to empower clients to meet their full potential.

Co-founded in 1991 by Duncan Angus, AKG is 100% Australian-owned and has helped more than one million people realise their potential over the past three decades.

Our partnership business model sets us apart. AKG is the holding company for a group of businesses which employ directly, or through partnerships, over 1,000 people. Our family of companies is made up of international, national and local organisations (including a number of indigenous not-for-profits) working collaboratively to create social impact locally and at scale.

Working with grassroots organisations embeds us in the communities we serve, so we can understand and respond to local labour market challenges and work as allies with the public and employers.



AKG Global operates in four core service areas:

Employment

Across the globe we work with unemployed people to find them long-term, meaningful jobs, through programs delivered on behalf of the Australian, UK, Canadian, Italian, Singaporean, and Swedish governments. We specialise in helping people who have experienced disadvantage, the long-term unemployed, people living with a disability, First Nations peoples, people from culturally and linguistically diverse backgrounds, refugees, ex-offenders, parents, the young and mature-aged people. We also work with employers to provide bespoke no-cost recruitment strategies to find, recruit, on-board and support diverse employees.

Wellbeing & Health

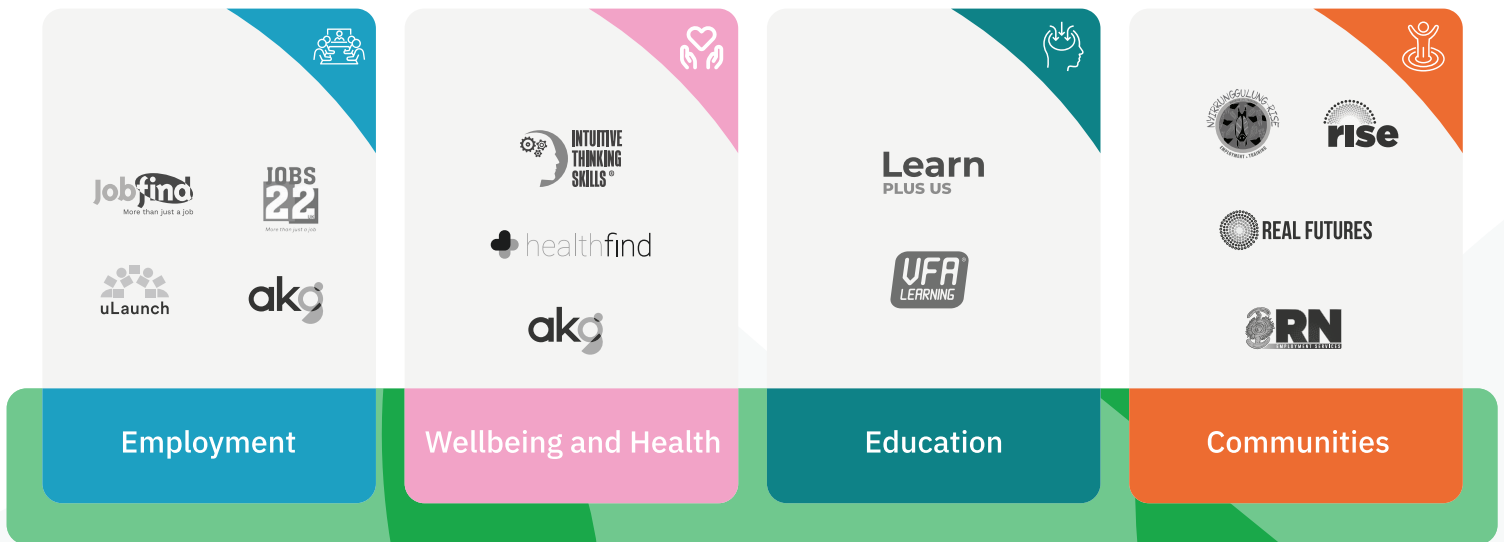
AKG Global's allied health services include Healthfind and Intuitive Thinking Skills in the UK and Healthy Workplace Ecosystem and School Health programmes in Singapore. Health, lifestyle, and personal issues can have an impact on people's capacity to find work. We help by addressing the physical, mental, and social barriers to employment goals.

Education & Training

Providing people with the skills they need for the jobs they want. AKG Global understands the importance of targeted skills development to get and hold a job. The capacity to provide integrated education and training is a vital component of our partnership model.

Communities

We run responsive programs to develop employment pathways, local business enterprises and community infrastructure. AKG Global operates in more than 300 communities across Australia, Canada, Italy, Singapore, Sweden, and the United Kingdom. We tailor our programs to suit local needs, whether for First Nations people, addressing the impacts of mental health and wellbeing, or outreach programs for young people.



3. Risks of Modern Slavery

AKG has a long-established Governance and Compliance function which reports independently to the AKG Board. It actively considers and reviews risks across its operations and supply chains and provides that overall compliance and monitoring of risks in relation to modern slavery. It is supported in this work with the recent establishment of the Committee comprising management and executive representation across the Corporate and related entities of AKG in Australia.

As reported in our first Modern Slavery Statement, we focused our analysis of modern slavery risks on key areas listed below. We consider these risk assessments to be valid and applicable in FY24:

Sector risks

We operate within the local services sector and do not manufacture or sell products. We consider our operational risks in this area to be low.

Recruitment and hiring practices

We have highly structured human resources recruitment practices within all our operations and operate within regulated labour award conditions of employment. This is considered to represent a low risk.

Products and services

Nearly all of our procurement is sourced through local suppliers. We have examined our purchase of goods and services in those areas which have been highlighted as higher risks by Australian Border Force (cleaning, hospitality, agriculture, textiles production and some types of manufacturing) and do not consider our limited purchases in these areas to be represent of high risk factors such as using migrant and seasonal labour.

Geographic risks

We operate in countries that generally have strong and regulated labour markets that have robust modern slavery conditions. We have recognise that some of our technology procurement is manufactured in countries which have a more elevated risk in downstream supply chains.



Our previous risk analysis identified several areas of risk and improvement in our operations and supply chain management which potentially elevate our risks of modern slavery, including:

- Visibility of modern slavery risks within our procurement analysis, policy and supply chain vetting and assessment processes.
- Enhancement required in our approach to governance, policy, and staff education and awareness practices.
- Reviewing our service delivery operational practices to ensure client safeguards are comprehensive in our post placement support, employer agreements and risk assessments, together with client feedback and reporting mechanisms.
- Improvements required in our due diligence approaches, ensuring we understand our supply chain operations, especially where these have a higher level of downstream supply chain risks.
- Improving the level of consultation across AKG Global with respect to modern slavery approaches and prevention.

4. Mitigations and Actions

In the FY24 reporting period, our Committee continued to mature our processes to improve the management of modern slavery risks. We will do this by establishing effective governance and consultation processes and improve our policy and practices within our operations and supply chain management.

We have not identified any instances which require remediation. If any matter were to arise, remediation action would be considered on a case-by-case basis by the Committee.

Our key strategies for 2025 include:



GOVERNANCE

In its second year since establishment, the Committee is tasked to:

- Inform and advise the Board on modern slavery related issues; and
- Monitor progress through ongoing reporting and review of its implementation.

Key actions in the FY24 reporting period included:

Devising a multi-year action plan for the continued enhancement of our anti-modern slavery policies and procedures.



OPERATIONS

The level of risk within our service operations is considered low. However, we have recognised that our operational policies, practices, and client resources have a low level of visibility. Our focus within operations will be to substantially review and enhance the effectiveness of identifying potential modern slavery risks by updating our policies and practices accordingly.

Key actions in the FY24 reporting period included:

Review of the following operational policies, including recommendations enhancing those policies to be approved and implemented in 2025:

- Whistleblower Policy
- Business Expenses and Corporate Card Policy
- Our People Policy
- Code of Conduct
- Fraud Control Policy and Plan
- Business Recovery and Continuity Plan
- Procurement Policy

Actions for our 2024/2025 Action Plan include:

- Incorporate modern slavery reporting and feedback into client support and safeguarding practices, and feedback processes.
- Develop internal and external incident management process.
- Review employer vetting, assessment, and agreements noting that Commonwealth agreements are used in many cases for wage subsidies and some employer and community services program agreements.
- Incorporate changes to supply chain and procurement practices within our devolved procurement operations.



SUPPLY CHAIN

As previously identified, our Supply Chain represents the highest level of risk within our operations. AKG Global has a supply chain profile of over 2800 suppliers, with a high percentage of expenditure concentrated within the top 3% of suppliers. Supply chain modern slavery risks are difficult to identify and, in many cases, have complex and highly distributed international supply chains. A key focus in this FY24 reporting period has been to conduct a review of our key suppliers.

Key actions in the FY24 reporting period included:

- We conducted further modern slavery risk assessment of our current suppliers that have an expenditure of \$200,000 or more (64 in total). This assessment examined supplier modern slavery practices (i.e. existence of Modern Slavery Statement), the nature of the goods and services provided and the level of their supply chain complexity. No instances of modern slavery were identified as part of this review. However, of those suppliers, 40 have been recommended for further review and 21 have a 'low to medium' risk with no further assessment needed at this stage. This review of risks will continue into FY25.
- The Committee determined as part of its 2024/2025 Action Plan that in 2025 it would develop:
 - A 'Supplier Code of Conduct' to govern the engagement with AKG Global's key suppliers;
 - A comprehensive supplier modern slavery risk assessment questionnaire to assist with the oversight of the key suppliers within our supply chain.

Actions on our 2024-2025 Action Plan include:

- Developing a new system as part of the internal online supplier registration to more easily identify key suppliers as they are onboarded.
- Develop a procedure to incorporate modern slavery terms and conditions into service and procurement agreements.
- Conduct enhanced review of all major supply agreements relating to:
 - Information technology supplier agreements where technology products are manufactured in higher risk countries;
 - Cleaning supplier agreement where those suppliers use contractors and may engage with immigrants; and
 - Uniform supplier agreements (textiles), where those suppliers are located outside of Australia.



STAFF AWARENESS AND EDUCATION

We remain committed to improving the level about understanding the risks of modern slavery within our business and to improving our effectiveness in monitoring and managing risk across our operations.

Key actions in the FY24 reporting period included:

- Rolling out a new Learning Management System that incorporates all of our existing modern slavery training modules to streamline and simplify our staff training programs. This will allow us to monitor the progress and completion of our staff training.

Actions for our 2024/2025 Action Plan include:

- Achieve good compliance rates with employees undertaking the staff training programs.

5. Ongoing effectiveness measures

Managing modern slavery risks is an ongoing strategy which requires discipline and vigilance. We will continue to engage in an ongoing review of our approach to ensure we have well established reporting processes in place which is a key outcome from this statement.

The Chief of Governance and Compliance is the assigned executive who will coordinate quarterly reporting processes through the Committee to the AKG Board.

We have reviewed and updated the following strategies to measure the effectiveness of our progress into 2025:

- Completion of operational policy and procedural review along with update to client modern slavery information resources.
- Establishment and inclusion of modern slavery within feedback/complaint handling processes along with incident management and escalation practices.
- Establishing formal internal modern slavery reporting (including incident reporting).
- The number of existing material suppliers and the number of findings which have been opened and closed.
All new suppliers are screened through new modern slavery assessment processes.
- Utilising the learning management system to incorporate modern slavery staff training and education modules which will also report on the number of staff completing refresher programs.

As part of the annual publishing of the Statement an annual audit will be conducted by the Governance and Compliance team and future statements will include an audited progress assessment of the preceding Modern Slavery Statement Actions.

6. Consultations

In this Statement a formal Committee, comprising representatives across the Australian controlled entities was established. This Committee led the analysis and development of this Statement with approval by the AKG Global CEO and AKG Board.

In addition, consultations were undertaken with AKG's international operations in the United Kingdom, Sweden, and Canada. While not formally part of this Statement we consulted on international requirements in each of these countries and noted that Jobs-22 in the United Kingdom already has an equivalent Modern Slavery Statement in place.

The CEO and AKG Board have been briefed on progress and the final Statement has been approved and signed off.

ATTACHMENT A – Controlled Entities

This Statement includes all controlled entities within Australia. We have also included controlled entities which are located internationally, which are not bound by the *Modern Slavery Act 2018* (Australia).

Controlled Entity	Country of incorporation	Ownership
AK Group Italia S.R.L.	Italy	100%
AK Group S.R.L.	Italy	100%
AKG Canada Employment Services Inc.	Canada	100%
Angus Knight Institute Pty Ltd	Australia	100%
Angus Knight Learning Pty Ltd	Australia	100%
AngusKnight Singapore Pte Ltd	Singapore	100%
Angus Knight (UK) Limited	UK	100%
Healthfind Pty Ltd	Australia	100%
Healthfind (UK) Ltd	UK	100%
Intuitive Thinking Skills Ltd	UK	100%
Jobfind Canada Inc	Canada	100%
Jobfind Centres Australia Pty Ltd	Australia	100%
Jobfind LWB Pty Ltd	Australia	100%
Jobfind Sverige AB	Sweden	100%
Jobs 22 Ltd	UK	80%
RISE Ventures Pty Ltd	Australia	100%
Simply One Stop Ltd	UK	100%
uLaunch Pty Ltd	Australia	100%
Victorian Fitness Academy Pty Ltd	Australia	100%



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