



Adcorp Group

Modern Slavery Statement

adcorp
Connecting Human Potential



The Adcorp Group is committed to using its capabilities and market position to improve socio-economic conditions in our communities by increasing employability and connecting people with opportunities

ADCORP GROUP MODERN SLAVERY STATEMENT

Anti-slavery, anti-trafficking and anti-child labour

Process Area	Human Resources – Corporate Citizenship	Statement Owner:	Head Sustainability
Statement Title:	Group Modern Slavery Statement	Revision No.:	1
Statement No.:	CC- STA-003	Approved by	Adcorp Holdings Limited Board and Adcorp Holdings Australia Board
Effective Date:	November 2024	Next Revision Date:	May 2025

This statement is applicable to the Adcorp Group of companies, its affiliates and subsidiaries in all geographies in which it operates hereinafter referred to as “Adcorp”.

This Modern Slavery Statement for Adcorp Group was approved by the boards of each of the two geographies. Adcorp Holdings Australia has two reporting entities, Paxus and Labour Solutions Australia, covered by this statement. The board of Adcorp Holdings Limited approved this statement on 27 January 2025. The board of Adcorp Holdings Australia approved this statement on 18 February 2025 for Paxus and Labour Solutions Australia.

Statement Owner:  Brandon Urdang 20/02/2025 Head Sustainability	Endorsed by:  Vinolia Singh 21/02/2025 Chief People Officer
This statement is approved by the Adcorp Holdings Australia Board and is signed by:  Dr John Wentzel 21/02/2025 Adcorp Group CEO and Adcorp Holdings Australia Board Chairperson	This statement is approved by the Adcorp Holdings Limited Board and is signed by:  Gloria Serobe 26/02/2025 Adcorp Holdings Limited Board Chairperson

GROUP MODERN SLAVERY STATEMENT

Introduction

This Modern Slavery Statement covers the financial year ending 29 February 2024 and details the actions taken by Adcorp Holdings Limited and its subsidiaries ("Adcorp") to assess and address the risks of modern slavery in our operations and supply chains. While our primary focus is compliance with the Australian Modern Slavery Act 2018 (Cth) and South African labour laws, we acknowledge the principles of the UK Modern Slavery Act 2015.

This statement was co-developed with our South African and Australian counterparts. Our brands across the group in South Africa and Australia are held to the same high standards of best practice, aligned with the geography with the more stringent legislation. All brands are required to apply the statement to their specific context, meaning that brands with higher risk profiles must have a greater focus on preventative measures.

Adcorp is a leading workforce solutions provider listed on the Johannesburg Stock Exchange with operations in South Africa and Australia. We specialise in Contingent Staffing, Professional Services, and Staffing Solutions, delivering innovative workforce solutions to optimise human capital throughout the entire employment lifecycle. We employ over 1 750 permanent employees and facilitate the deployment of over 40 000 employees daily. Notably, we support the Pacific Australia Labour Mobility (PALM) Scheme, employing 1 410 contingent PALM Scheme employees across our clients in Australia.

Our Operations and Supply Chains

Our Operations

Adcorp's core activities involve recruitment and selection, skills development, and workforce management. We engage with a wide range of suppliers to support our operations, including labour hire providers, technology solutions providers, facilities management companies, and professional service firms. As a workforce solutions company, Adcorp's core activities involve:

- **Recruitment and Selection:** Sourcing, screening, and placing candidates across various industries and roles. This includes advertising vacancies, conducting interviews, and performing background checks.
- **Skills Development:** Providing training and development programmes to enhance the skills and employability of our workforce and students who choose to study with us.
- **Workforce Management:** Managing the deployment and performance of contingent workers, including payroll, timekeeping, and addressing workplace issues.

We recognise the importance of addressing modern slavery risks throughout our operations and supply chains. We are committed to implementing robust due diligence processes, promoting ethical sourcing, and ensuring that all workers are treated fairly and with dignity. Adcorp Holdings Limited is inclusive of all South African and Australian brands, while Adcorp Holdings Australia is inclusive of our Australian brands only. Below are our brands:



- **South Africa:**

Our **contingent staffing** businesses serve over 1000 client locations in South Africa, spanning from manufacturing, fast moving consumer goods, automotive, agriculture, mining, renewables, hospitality and logistics:

- **BLU** – A leading provider of flexible staffing solutions, specialising in blue-collar temporary staffing across major industries. BLU offers a comprehensive range of services including workforce sourcing, screening, management, payroll and HR administration.
- **I CAN** - Specialises in providing disability placement services and disability training solutions. Also manages learnerships providing opportunities for employers to engage with persons with a disability.
- **PMI** - A private higher education institution that specialises in vocational and higher education, focusing on up-skilling, reskilling, and future-skilling across various sectors.
- **Zest Hospitality** – A best of class flexible hospitality staffing solution that offers experienced front and back of house associates to deliver an exceptional customer experience.

Our **staffing solutions** businesses offer fully outsourced staffing solutions to clients, enabling them to optimise costs and enhance operational performance while allowing them to focus on their

core. We serve over 60 unique customer facilities throughout South Africa, with industries in fast moving consumer goods, manufacturing, warehousing and logistics, specialist cleaning and global business service contact.

- **Capability** - Specialises in high-performance, specialised cleaning services tailored to meet the stringent requirements of industries such as food processing, manufacturing, and distribution centres.
- **FunxionO** - Specialising in outsourced business solutions that leverage technology to enhance operational efficiency and productivity. FunxionO offers a range of specialised services within manufacturing and related industries.
- **Telvuka** - A business process outsourcing provider offering customised solutions to enhance customer service and support. Telvuka provides comprehensive services including inbound and outbound customer interactions.

Our **professional services** businesses are composed of over 4200 contractors, training and permanent placements. Some of the sectors of our clients, include financial services, healthcare, telecommunications and technology.

- **Charisma** - Specialises in recruiting and staffing nurses and healthcare workers for both private and public healthcare sectors in South Africa. Charisma provides highly trained and reliable nursing professionals.
- **DAV** - A premier South African recruitment agency specialising in the placement of scarce and specialised skills across various sectors including finance, IT, engineering, and supply chain management.
- **Kelly** - Provides comprehensive recruitment solutions from general admin to executive levels, emphasising rapid, personalised service and strong client relationships.
- **Jobvine** - An online job portal that connects job seekers with employment opportunities across various industries. Jobvine also supports freelancers by providing a community and marketplace for freelance work.
- **Paracon** - A leading IT staffing brand specialising in technology solutions and staffing services across various industries. Paracon empowers businesses through innovative IT strategies and a robust talent pool, aiming to enhance operational efficiencies.
- **Quest** - Focused on connecting top talent with leading employers. It offers temporary, permanent, and project staffing solutions into white-collar professional sectors.
- **talentCRU** - Specialises in tailored recruitment solutions, including Recruitment Process Outsourcing and Managed Services Provider programs. TalentCRU specialises in providing scalable, bespoke services that meet the specific needs of their clients.

- **Torque IT** - A premier IT training and certification academy in South Africa, specialising in vendor-authorised, instructor-led training aimed at enhancing IT skills across various technologies.
- **Australia:**

Our **contingent staffing** businesses focus on the shortage of Australian blue-collar employees. An important part of the business is to enable migrant employees from the PALM Scheme to fill these blue-collar gaps in various industries from agriculture, building and construction, manufacturing, food processing and healthcare.

 - **Labour Solutions Australia (LSA)** - Offering tailored workforce solutions across Australia specialising in blue-collar, industrial and food processing recruitment and labour hire striving to match the right candidates with the right jobs.
 - **LSA Health** - Operating in Australia's healthcare sector providing reliable, compliant, and suitably qualified healthcare professionals. Offering specialised recruitment services including allied health, aged care and hospital staffing.

Our **professional services** business focuses primarily on information technology and technology sectors, offering IT recruitment, contracting, consulting and managed services.

- **Paxus** - A leading IT recruitment agency, providing extensive services in IT contract recruitment, permanent staffing, and talent solutions. They offer specialised services across various sectors including AI, cybersecurity, and software development.

Our Supply Chains

Adcorp's supply chains encompass a range of goods and services that support our operations, including:

- **Labour hire:** Sourcing contingent workers from various labour hire providers and directly from individuals.
- **Technology solutions:** Procuring IT equipment, software, and services from technology providers.
- **Facilities management:** Engaging suppliers for cleaning, security, and maintenance of our offices and branches.
- **Professional services:** Utilising services from legal, financial, and consulting firms.

We manage modern slavery risks in our supply chains through:

- **Supplier Code of Conduct:** Implementing a Supplier Code of Conduct that outlines our expectations regarding ethical sourcing and labour standards (in progress).
- **Monitoring and review:** Running an environmental, social and governance (ESG) supply chain assessment, to monitor our suppliers' performance and compliance with our requirements (in progress).
- **Contractual obligations:** Including clauses in our supplier contracts that require compliance with modern slavery legislation and our supplier code of conduct (planning phase).
- **Supplier due diligence:** Conducting risk assessments of our suppliers, considering factors such as their industry, geographical location, and labour practices (next steps).

Pacific Australia Labour Mobility (PALM) Scheme

Adcorp participates in the PALM scheme, which enables the temporary movement of workers from Pacific Island countries and Timor-Leste to Australia. We source talent from these countries to fill labour shortages in specific sectors. We are committed to ensuring that workers participating in the PALM scheme are treated fairly and ethically, with their rights and welfare protected.

Understanding Modern Slavery

Modern slavery is a complex issue encompassing various forms of exploitation. The Australian Modern Slavery Act 2018 (Cth) identifies eight forms of modern slavery:

1. **Forced Labour:** Situations where a person is forced to work and is either not free to stop working or not free to leave their place of work.
2. **Forced Marriage:** Situations where coercion, threats, or deception are used to make a person marry.
3. **Trafficking in Persons:** The recruitment, transportation, transfer, harbouring, or receipt of persons by means of coercion for exploitation.
4. **Slavery:** The status or condition of a person over whom any of the powers attaching to the right of ownership are exercised.
5. **Servitude:** The condition of a person who is forced to work for another person and is unable to leave that service.
6. **Debt Bondage:** A situation where a person is forced to work to repay a debt under unclear or exploitative terms.
7. **Deceptive Recruiting for Labour or Services:** Recruitment of a person for work or service by deception about the terms or conditions.
8. **Worst Forms of Child Labour:** Work that is likely to harm the health, safety, or morals of children.

Adcorp acknowledges the diverse nature of modern slavery and remains vigilant in identifying and addressing potential risks associated with all these forms of exploitation within our operations and supply chains.

Risks of Modern Slavery in our Operations and Supply Chains

Adcorp acknowledges its responsibility to respect human rights and prevent modern slavery in its operations and supply chains, guided by the UN Guiding Principles on Business and Human Rights. We are committed to fulfilling this responsibility by actively identifying, assessing, and mitigating modern slavery risks.

Our Approach to Risk Management

Modern slavery risks are integrated into our existing ESG risk processes. Our practices will mature over time:

- **Sector and Industry Risks:** We recognise that certain sectors and industries have inherently higher risks of modern slavery. When assessing risk, we consider factors such as:
 - Use of unskilled, semi-skilled, temporary, or seasonal labour
 - Use of short-term contracts and outsourcing
 - Risk of child labour
 - Reliance on foreign workers
 - Visibility of work
 - Recruitment strategies
- **Product and Service Risks:** We acknowledge that certain products and services may have higher risks of modern slavery associated with them. We consider factors such as:
 - Cost pressures and delivery timeframes
 - Use of forced labour
 - Presence of vulnerable groups
 - Reports of exploitation
- **Geographic Risks:** We acknowledge that some countries have higher risks of modern slavery. When assessing geographic risks, we consider:
 - Ratification of international conventions
 - Prevalence of modern slavery
 - Worker protections
- **Entity Risks:** We acknowledge that certain characteristics of entities within our operations and supply chains can increase the risk of modern slavery. When assessing entities, we consider factors such as:
 - Governance Structures

- Treatment of Workers
- Supply Chain Practices
- Information Accessibility
- Recruitment Costs
- Residential Support for PALM scheme employees
- **Indicators of Modern Slavery:** We remain vigilant in identifying potential indicators of modern slavery. These indicators may include:
 - Contractual Issues
 - Lack of Safety
 - Visa Issues
 - Living Conditions
 - Working Conditions
 - Financial Control
 - Signs of Abuse
 - Lack of Freedom
 - Vulnerable Groups

Mitigating Risks

Adcorp is dedicated to mitigating modern slavery risks through proactive measures:

- **Enhanced Due Diligence:** We conduct thorough due diligence on employees, ensuring that they are legally able to work.
- **Worker Empowerment and Support:** We provide clear information to all workers about their rights and support services, including clear employment contracts, we do not charge recruitment fees and do not keep employees original documents.
- **Transparency and Monitoring:** We maintain transparent practices and are building capacity for monitoring.

Risk Assessment Findings

Our risk assessments have identified the following key areas of vulnerability:

- **Operations:** Outsourced services where our employees are stationed at customer sites.
- **Supply Chains:** Potential for forced labour, child labour, and exploitation of employees.
- **Migrant Labour:** Risks associated with migrant employees, through our PALM Scheme participation.

High-Risk Sectors according to Walk Free Global Slavery Index (<https://www.walkfree.org/global-slavery-index/>)

- **South Africa**, estimated US\$4.8 billion at risk goods imported
 - Palm Oil, Solar Panels, Textiles, Garments, Electronics
- **Australia**, estimated US\$17.4 billion at risk goods imported
 - Solar Panels, Fish, Textiles, Garments, Electronics

- Additionally, according to the Australian Government, Attorney-General's Department, the below products and services can have high modern slavery risks:
 - Cleaning, Hospitality, Agriculture, Textiles Production, some types of Manufacturing (risk due to use of low skilled labour or reliance on outsourcing)
 - Rubber Products, Bricks and Construction Materials, Minerals, Cocoa and Tea (risk due to the way they are produced, provided or used)

Our Commitments and Actions

Adcorp is fully committed to upholding the highest ethical standards and respecting human rights throughout our operations and supply chains. We firmly believe that businesses have a crucial role to play in combating modern slavery and creating a more just and equitable world.

Our Ethical Foundations

Adcorp's approach to business is deeply rooted in our core values of Teamwork, Respect, Customer Centricity, Agility, and Diversity and Inclusion. These values and our code of ethics guide our actions and underpin our commitment to ethical conduct. We foster a culture of trust, integrity, and accountability, ensuring that ethical considerations are embedded in every aspect of our work.

We recognise the devastating impact of modern slavery, human trafficking, and child labour. These are abhorrent human rights violations, and we have a zero-tolerance approach to these practices. This Modern Slavery Statement, aligned with our Human Rights Statement, reaffirms our unwavering commitment to respecting human rights and promoting ethical and humane practices throughout our operations and supply chains.

Our Commitments

- **Zero Tolerance:** We have a zero-tolerance approach to all forms of modern slavery, human trafficking, and child labour.
- **Compliance and Best Practices:** We adhere to key legal frameworks and best practice standards, including, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, International Labour Organisation (ILO) Convention 182 on the Worst Forms of Child Labour, and ILO Convention C138 on the Minimum Age for Admission to Employment.
- **Key Legislation:** We comply with all relevant legislation in the countries where we operate, including the Australian Modern Slavery Act 2018, and South African labour laws.
- **Protection:** We prioritise the safety and wellbeing of all workers and aim to identify and support potential victims of modern slavery.
- **Worker Identity:** Before any employee starts, we confirm their identity and legal right to work. Our specialised payroll team then double-checks that each contingent employee is being paid correctly according to the appropriate industry standards.
- **Ethical Recruitment:** We maintain fair and transparent recruitment processes, provide clear employment conditions, and ensure decent working conditions for all workers.
- **Vulnerable Groups:** We are particularly sensitive to the risks faced by vulnerable groups, such as women, migrant workers, and disabled employees.

- **Culture and Living Conditions:** We support the integration of migrant workers into the local society.
- **Awareness and Support:** We are committed to raising awareness of modern slavery and providing support to our employees, suppliers, and stakeholders.
- **Partnerships:** We collaborate with our customers and suppliers to strengthen our collective efforts against modern slavery.
- **Transparency and Accountability:** We are committed to regularly reporting on our progress and challenges in combating modern slavery.

Actions Taken

We have taken the following actions:

- **Developed and implemented group-wide policies:** Introduced our group-wide modern slavery policy, reviewed internal policies, and reviewed supplier engagement processes.
- **Enhanced supplier due diligence:** Reviewed our Supplier Code of Conduct.
- **Developing training and awareness programmes:** Developing internal modern slavery training for employees and established procedures for responding to modern slavery risks.
- **Fair employment practices:** Regularly review our employment contracts and policies comply with legal standards and best practices.
- **Provided anonymous reporting channels:** Offered an independently managed whistleblowing hotline for reporting modern slavery concerns.
- **Conducted risk assessments:** Conducted a high-level scoping exercise to better understand possible modern slavery risks linked to our operations and supply chain.
- **Enhanced supply chain transparency:** Committed to enhancing supply chain transparency and contributing to our customers' due diligence processes.

Assessing the Effectiveness of Our Actions

We are committed to continuously monitoring and improving the effectiveness of our actions to address modern slavery risks.

Key Performance Indicators (KPIs)

We use KPIs to measure the effectiveness of our actions across four key areas:

- **Governance and Due Diligence:**
 - Number of risk assessments completed
 - Number of high-risk suppliers identified, and corrective action plans implemented
 - Percentage of contracts with modern slavery clauses included
 - Number of suppliers completing our modern slavery questionnaire
- **Procurement and Supply Chain:**

- Number of modern slavery incidents reported
- Incident investigation time and remedial action taken
- Victim support and remediation provided
- Number of actions taken to work with suppliers to improve their capacity to respond to modern slavery risks
- **Training, and Awareness:**
 - Employee training completion rates
 - Number of modern slavery training and awareness-raising programmes delivered
- **Grievances and Reporting:**
 - Number of modern slavery cases identified and remediated
 - Proportion of complaints resolved through our grievance mechanism

Continuous Improvement

We recognise that assessing the effectiveness of our actions is an ongoing process. We will continue to review and enhance our KPIs, regularly update our Modern Slavery Statement, monitor trends in reported incidents, and collaborate with stakeholders to improve our efforts.

Consultation and Modern Slavery Reporting

Adcorp is committed to open communication and collaboration with our stakeholders to address modern slavery risks. This joint modern slavery statement has been compiled with input from employees in specialist roles from both our South African and Australian businesses.

Reporting Mechanisms

We have established multiple channels for reporting modern slavery concerns:

- **Decentralised Stakeholder Management Approach:** Empowers relationship owners to report and address concerns internally. Stakeholder registers are regularly completed by relationship owners, filtered through the CEOs office and analysed by the Corporate Citizenship Function.
- **Whistleblower Hotline:** Allows for anonymous reporting of concerns. The risk and compliance department thoroughly investigates all complaints and outsources external guidance if necessary.

Independent, Anonymous, Deloitte Managed: Whistleblowers Hotline

Adcorp Group Ethics Line

Free call: 0800 22 32 11

Website: <http://tip-offs.com>

Email: advalue@tip-offs.com

To protect those speaking up, every report is treated confidentially and thoroughly investigated.

For guidance, please contact us on CorporateCitizenship@adcorpgroup.com

Remediation

Adcorp is committed to taking swift and effective action to remediate any instances of modern slavery identified within our operations or supply chains.

Our Approach to Remediation

Our remediation efforts are guided by these principles:

- **Victim-Centred Approach:** Prioritising the needs and rights of victims.
- **Collaboration:** Working with stakeholders to address and remediate cases.
- **Transparency:** Maintaining open communication throughout the process.
- **Continuous Improvement:** Continuously reviewing and improving our processes.

Remediation in Our Operations

If we identify a case of modern slavery in our operations, we will:

- Take immediate action to stop the exploitation.
- Conduct a thorough investigation.
- Provide comprehensive support to victims.
- Take appropriate remediation measures, including back pay, and support for reintegration.
- Implement preventive measures to address root causes and prevent recurrence.
- Take legal action, if appropriate.

Remediation in Our Supply Chains

If we identify a case of modern slavery in our supply chains, we will:

- Engage with the supplier to understand the situation and require immediate action.
- Collaborate with the supplier to develop and implement a remediation plan.
- Suspend our business relationship with the supplier while the plan is being implemented.
- Terminate our contract with the supplier if the issue is not resolved.
- Take legal action against the supplier, if appropriate.

Conclusion and Looking Ahead

Adcorp recognises that the fight against modern slavery is an ongoing journey. We are committed to continuously improving our practices, informing our employees, and collaborating with our stakeholders.

We will continue to strengthen our response to modern slavery by:

- Enhancing our risk assessment and due diligence processes.
- Expanding our training and awareness programmes to cover modern slavery risks, identification and remediation.
- Strengthening our supplier engagement.
- Improving our reporting and remediation mechanisms.
- Monitoring and measuring our progress.
- Reviewing our employee and supplier contracts and if deemed appropriate adding modern slavery clauses.

Adcorp remains unwavering in our commitment to combating modern slavery in all its forms. We believe that by working together, we can contribute to a world where everyone enjoys fundamental freedoms and dignity.