



PLAYFAIR®

MODERN SLAVERY REPORT

2024

INTRODUCTION

International Crossover Pty Ltd holds the ABN 47 003 604 886 on the Australian Business Register, on behalf of a multidisciplinary practice, called the PLAYFAIR. PLAYFAIR, comprising International Crossover Pty Ltd as principal (trading as PLAYFAIR Visa and Migration Services), Playfair Legal Pty Ltd (ABN 25 632 711 954), and PLAYFAIR Advisory (ABN 93 657 427 417) as associate.

The PLAYFAIR Group head office is Level 8, 229 Macquarie Street, Sydney NSW 2000. PLAYFAIR Group has branch offices in Melbourne, Ha Noi, Vietnam and Athens, Greece.

This statement is a joint submission by International Crossover Pty Ltd, Playfair Legal Pty Ltd and PLAYFAIR Advisory.

As part of the preparation of this statement, all entities engaged in a collaborative consultation process. This included:

- Joint planning meetings between executive leadership teams;
- Shared access to operational and risk data;
- Review and alignment of internal policies and procedures;
- Agreement on risk mitigation strategies and reporting mechanisms.

These consultations ensured that all entities contributed to and endorsed the content of this statement.

ORGANISATIONAL STRUCTURE

PLAYFAIR's organisational structure consists of:

- A. 5 operational and service areas:
 - I. Migration Services (delivery of visa and migration advice and support)
 - II. Incorporated Legal Practice known as PLAYFAIR Legal
 - III. Settlement services related to the migration journey, including business, employment, accounting and financials (PLAYFAIR Advisory)
 - IV. Consultancy related to attracting and retaining labour;
 - V. Business Development
- B. The Executive Team, comprised of:
 - i. CEO
 - ii. Business Manager
 - iii. Principal Solicitor of the Law Firm (PLAYFAIR Legal).

PLAYFAIR does not own or control any other entities.

OPERATIONS

PLAYFAIR provides personalised immigration and visa services for individuals, small businesses, and large organisations.

PLAYFAIR's primary services (over 90% of our workload) includes:

- A. Provide visa services and advice to employers.
- B. Offer migration services to private clients.
- C. Provide visa services and advice to Refugees and Asylum seekers seeking Humanitarian Visas.
- D. Work with the Australian Government to advise on and implement migration activities.

PLAYFAIR has approximately 20 employees. The organisation has 2 offices in Australia, 1 office in Vietnam and 1 office in Greece.

While PLAYFAIR is primarily based in Australia, the team has worked in 41 countries.

PLAYFAIR's stakeholders include, but are not limited to:

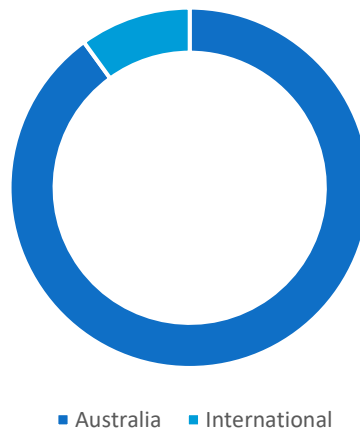
- A. Employees
- B. Corporate clients
- C. Private clients
- D. Our regular suppliers
- E. The Commonwealth Government and its agencies.
- F. The Australian community.
- G. The international community.
- H. The United Nations

SUPPLY CHAINS

PLAYFAIR's supply chains are with various suppliers and specialists from Australia and internationally. Suppliers to PLAYFAIR are required to comply with any laws, statutes, regulations, by-laws, ordinances, or subordinate legislation.

Major Service Required	Source Country
Travel Services	Australia
Provision of IT equipment and supplies	Australia
IT services	Australia
Provision of office services and supplies such as cleaning and office furniture	Australia using international companies (HP, Lenovo, Jabra)

Supply Chains



MODERN SLAVERY RISK AREAS

Sector and Industry Risks

The migration operations – Playfair Legal and Playfair Visa and Migration – are both involved in operations allowing people to be brought to Australia and therefore are subject to operational issues which may be an element of modern slavery, particularly the facilitation of entry to Australia of people holding foreign nationality.

The Visa and Migration industry can contribute to modern slavery in several ways:

- A. Migrants are subject to significant expenses to secure visas and/or employment opportunities in Australia.
 - I. These fees can attribute to migrants becoming indebted to their recruiters or employers and are subsequently forced to work in conditions of forced labour or debt bondage to repay their debts.
- B. Facilitating the trafficking of people across borders
 - II. Traffickers may use the services of migration agents to obtain fraudulent travel documents or visas, allowing them to be transported to Australia for the purposes of forced labour or sexual exploitation.
- C. Vulnerabilities of undocumented migrants
 - III. Undocumented migrants may be afraid to report abuse or exploitation in fear of being deported or punished. This can create a situation where migrants are forced to work in exploitative conditions, often with very low wages and little or no legal protection.

Supply Chain Risks

- A. A supply chain risk is that it is difficult to monitor which supply chains the Greece office contracts. Due to inter-jurisdictional complexities, it is difficult to regulate Greece's operations remotely.
- B. The industry which manufactures computer components has a history of indentured labour and servitude.

RISK CONTROLS

Sector and Industry Risks

PLAYFAIR has reduced the risks associated with Letter of Engagement by requiring the Applicant to sign a contract, promising that the information they are providing is accurate and true. This means the onus of truthfulness is born on the Applicant.

However, PLAYFAIR, as a Migration and Visa agency, cannot completely eliminate the risk of dishonesty. However, we use our extensive knowledge and migration acumen through the hiring and further training of experienced personnel to be able to identify when accurate and true information may not be provided.

Supply Chain Risks

PLAYFAIR can monitor the activities of the Greece and Vietnam office by ensuring there is ongoing communication and transparency in all migration activities across offices.

PLAYFAIR is aware that the industry which manufactures IT Components has a history of indentured labour and servitude. The company has sought to mitigate risks in its outsourcing relationships with the provision of ICT equipment suppliers from Australia.

PLAYFAIR's Direct Operations

PLAYFAIR has eliminated the risks associated with these Contracts through compliance with the *Fair Work Act 2009* (Cth) including:

- A. Requiring employees to provide identity documents.
- B. Ensuring employees are paid according to market rates.
- C. Ensuring employees are protected under a standard Australian employment contract, providing all employees the same rights of Australian permanent residents and citizens.

PLAYFAIR's operational divisions of PLAYFAIR Legal and PLAYFAIR Visa and Migration Services, are subject to their respective authorities of professional supervision:

- A. PLAYFAIR Legal is monitored by the Law Society of NSW. Further, all work undertaken by PLAYFAIR Legal is supervised by the Principal Legal Officer Mr. George Lombard. Our Legal Officer is aware of the threat of modern slavery and are committed to mitigating these practices in the company's caseloads.
- B. PLAYFAIR Visa and Migration Services is closely monitored by OMARA, the statutory body supervising Registered Migration Agents. Further, this operational segment is managed by Mrs. Petra Playfair. Please note that particular care has been taken to maintain the probity of these operations.

REPORTING PROCEDURES

International Crossover ensures compliance with all the requirements under Australian law, including the Fair Work Act, OMARA and the Law Society of NSW. The result is that the strict statutory controls render the risk of modern slavery, across operations, low.

All employees are protected by Clause 10.4 of PLAYFAIR's standard employment contract which requires the company and its contractors to comply with DFAT's 'Preventing Sexual Exploitation, Abuse and Harassment Policy.'

Under the policy, PLAYFAIR is subject to strict reporting requirements. In particular, the policy effectively monitors the company's compliance with anti-slavery procedures through two key mechanisms:

- A. DFAT can conduct reviews of PLAYFAIR's compliance with DFAT's Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy.
- B. PLAYFAIR is obligated to report:
 - I. Any alleged case of sexual exploitation, abuse and harassment in the provision of the company's services to DFAT within 48 hours of becoming aware of the case.
 - II. Any alleged incidents of non-compliance with the PSEAH Policy to DFAT within 5 Business Days of becoming aware of the incident.
- C. In reporting to DFAT, PLAYFAIR is subject to the requirements of the *Privacy Act 1988 (Cth)*, Principle 3 of the PSEAH Policy and privacy provisions in the Sexual Exploitation, Abuse and Harassment (SEAH) Incident Notification Form.

Assessing Effectiveness of Actions

PLAYFAIR assesses the effectiveness of its actions to address modern slavery risks through the following mechanisms:

- Regular internal reviews of supplier contracts and due diligence processes;
- Annual staff training on ethical conduct and modern slavery awareness;
- Monitoring compliance with the Fair Work Act and DFAT's PSEAH Policy;
- Feedback mechanisms for employees and clients to report concerns;
- Periodic review of risk indicators in supply chains and operations.

These measures help ensure continuous improvement in identifying and mitigating modern slavery risks.

This Modern Slavery Statement was approved by the Board of Directors of International Crossover Pty Ltd on 11 June 2025.

The statement has been signed by Petra Playfair, Director and CEO, as the responsible member of the principal governing body.



International Crossover Pty Ltd & Playfair Legal

Petra Playfair

Director & CEO