



Angus
Knight

MODERN SLAVERY STATEMENT

DECEMBER 2023



GROUP CEO MESSAGE

The Angus Knight Group provides services in Australia and internationally directed at empowering 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 the 1st Modern Slavery Statement and outlines our approach to the identification of risks and key actions over the next 12 months.

Key to our first statement is developing strong structures and governance mechanism to support our ongoing program of work. We have identified a number of priority areas for the coming year, including:

- Governance frameworks responsive to modern slavery risks relevant to our organisation
- Supply Chain assessment and management practices
- Continually reviewing our operations and corporate policies relevant to modern slavery risk assessment.
- Reviewing our activities across the group nationally and internationally and increasing our consultation
- Enhancing staff training, awareness, and education
- Identifying areas of best practice occurring internally and externally.

I am pleased to present this 1st statement which was approved by the AngusKnight Pty Limited Board in December 2023.



Nic Fairbank, Group CEO and Managing Director



PRIORITIES FOR 2024



Governance

- Establish a Modern Slavery Executive Committee (first meeting occurred in 2023 with a program of meetings over the next 12 months)
- Establish Angus Knight Group Quality and Integrity Subcommittee and Board reporting framework.



Review of Policy Framework

- Review and introduce policies to incorporate modern slavery risk management.
- Enhance operational practices to ensure Modern Slavery Act best practices.



Risks and Mitigation

- Comprehensive risk assessment of operations and supply chains
- Develop comprehensive actions to mitigate MS risks. Develop templates to support modern slavery risk assessment and contractor reviews and ensure appropriate clauses are included and monitored in key contracts.



Staff Training & Awareness

- Introduce compliance training for all staff.
- Enhance staff ability to recognise and identify MS risks through ongoing communication and dialogue.

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1. INTRODUCTION

AngusKnight Pty Ltd (Angus Knight Group or Group) is a private company registered in Australia and its controlled entities are named in Attachment A (Angus Knight Group or Group).

This Modern Slavery Statement (the Statement) is made in accordance with the Australian Modern Slavery Act, 2018 (MSA). It also recognises and accords with similar requirements within our internal overseas 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 AngusKnight Pty Ltd (ABN 58076749605) and its controlled entities in Australia. Where required group overseas entities have provided in jurisdiction compliant modern slavery statements in accordance 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 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 Angus Knight Group's first statement which recognises our commitment to 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 2024.



We have established formal governance processes to assess, review and enhance our management of modern slavery risks. This has included the establishment of a Modern Slavery Committee (Committee) comprising executives from across corporate and Group entities, AKG Board compliance and reporting and enhancement to Group consultation and policy alignment. The Committee comprises of representatives across our three key business areas; employment, education and training together with key service delivery leads across people and culture, IT, legal, finance and compliance.

The Committee has established terms of reference and reports to the Angus Knight Group CEO. A key early focus for the Committee is the identification of potential supply chain risks and the development of a program of work and actions for calendar year 2024.

The focus of this first statement was to outline the governance framework, understand the scope of our operations and existing supply chains, assess the key risks and set forth a program of actions, approaches and effectiveness measures which would enhance our ability to identify and respond to the risks of potential modern slavery within the Group.

2. ABOUT ANGUS KNIGHT GROUP

Angus Knight is a group of businesses working together to empower individuals, organisations and communities through innovative employment, training, and community solutions. We operate in more than 300 locations in Australia, Canada, Sweden, and the UK and most recently Italy and Singapore, servicing diverse markets across the government, corporate, First Nations and community sectors.

Angus Knight combines customer-focused insights with productivity prowess to empower clients to meet their full potential. In addition to our controlled entities, the Angus Knight Group also holds non-controlling interest in three joint venture entities operating in the community sector which do not form part of this statement. As part of Angus Knight’s service support to those entities, it will continue to offer opportunities for education and training to those entities aligned with its program of work on modern slavery risk identification.

Co-founded in 1991 by Duncan Angus, the Angus Knight Group is 100% Australian-owned and has helped more than 1 million people realise their potential over the past three decades.



AngusKnight Pty Ltd is the holding company for a group of private companies which employ directly, and through our partnerships, over 1,200 people globally and approximately 632 people in Australia operating in locations across all states and territory (excluding the Australian Capital Territory).

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.

In summary, Angus Knight operates in 3 core service areas:

EMPLOYMENT SERVICES

The Angus Knight Group works across the globe with unemployed people to find them long-term, meaningful jobs, through programs delivered on behalf of the Australian, UK, Canadian 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.



COMMUNITY SERVICES

We run responsive programs to develop employment pathways, local business enterprises and community infrastructure. 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.



EDUCATION AND TRAINING

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



3. RISKS OF MODERN SLAVERY

The first action in our response to modern slavery risk assessment was to establish the Modern Slavery Working Committee comprising of management representation (see above). This committee reports to the Board Quality, Integrity and Risk Committee which is a subcommittee of AngusKnight Pty Ltd Board.

The role of the Modern Slavery Working Group is to actively consider and review risks across the Groups' operations and supply chains and provide monitoring of risks and actions responsive to those risks in relation to modern slavery. The first meeting of the Committee took place on 28 November 2023 with an action plan developed for 2024. The Committee will be expanded in 2024 to include representatives from our overseas regions who were consulted in the development of this statement to share best practice learnings and initiatives.

Drawing on the discussions from the Committee, Angus Knight Group has commenced a review of modern slavery risks across the operations of our entities. Using our existing risk management framework, we have focussed our analysis on the following key areas:

SECTOR RISKS

We operate within the local services sector and do not manufacture or sell products and 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 and considered to represent a low risk.

PRODUCTS AND SERVICES

Nearly all of our procurement is sourced through local suppliers and 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 don't consider our limited purchases in these areas to be representative of high risk factors such as using migrant and seasonal labour.

However, further risk assessment will be undertaken in 2024 to meet with our key suppliers to understand what our key suppliers are doing to identify and respond to modern slavery risks in the supply chain.

GEOGRAPHIC RISKS

We operate in countries which generally have strong and regulated labour markets which have more robust modern slavery preventions. We have recognised that some of our technology procurement is manufactured in countries which have a more elevated risk in downstream supply chains. Further risk assessment will occur in 2024 in relation to those suppliers.

Our risk analysis has identified several areas of risk and improvement in our operations and supply chain management to reduce our risks of modern slavery, including the following which will be priorities for response in 2024:

- Visibility of modern slavery risks within our procurement analysis, policy and supply chain vetting and assessment processes.
- Staff education and awareness to enable staff to identify potential signs of modern slavery risks.
- Reviewing our service delivery operational practices to specifically refer to modern slavery risk identification in our client safeguard practices and post placement support, employer agreements and risk assessments, together with client feedback and reporting mechanisms.
- For future procurement and partnerships ensuring modern slavery compliance due diligence is embedded
- Improving the level of consultation and discussion across the Group with respect to modern slavery approaches and prevention including building awareness into our staff briefings
- Continually communicating clear pathways for reporting modern slavery risks including through management structures and whistleblower policies and associated training.



4. MITIGATIONS AND ACTIONS

In this first Modern Slavery Statement we have recognised areas to enhance and mature our processes to improve the management of modern slavery risks. We will do this by building on governance structures and consultation processes and improve our policy and practices within our operations and supply chains management.

Our key strategies for 2024 will include:

GOVERNANCE

With the development of this statement, we have elevated modern slavery risks at the Board level and established a multi-entity cross group Committee. The Committee's role is to inform and advise the Board on modern slavery related issues and facilitate the management of modern slavery risks across the Group. It will monitor progress through ongoing reporting and review of its implementation.

The Compliance and Governance Function will expand its risk assessment, audit and assurance activities and coordinate regular reporting to the Board through the Committee. This function will also independently review any incidents which arise, including all internal and external reports received across the group.

Key actions include:

- Establishment of the of the Modern Slavery Working Committee management and reporting practices and regular review meetings.
- Defining key effectiveness and reporting measures for the Committee and Board and implementing a quarterly reporting framework.
- Developing monitoring and audit assurance processes across the group.

OPERATIONS

The level of risk within our service operations is considered low, however, we have recognised that our operational policies, practices, and client resources could enhance its level of visibility. Our focus within operations will be to substantially review and enhance the effectiveness of identifying and responding to modern slavery risks.

Key actions include:

- Review of all operational policies and procedures and update client information resources to reflect modern slavery risks and awareness.
- Incorporate modern slavery reporting and feedback into client support and safeguarding practices, and feedback processes.
- Develop internal and external incident client process and risk assessment tools.
- Review of 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

Our Supply Chain may represent a higher level of risk within our operations and while our procurement policies already identify a general prohibition associated with modern slavery practices our review has identified enhancement of the visibility of modern slavery practices risk across our general procurement as a key focus for 2024. Our analysis identified an action to increase our due diligence and visibility of our supply chain including its downstream supply chain and manufacturing risks. The group has a supply chain profile of over 2800 suppliers as outlined below, with a high percentage of expenditure concentrated within the top 3% of suppliers.

Amount	No. of Suppliers	Percentage
\$1M +	2	0.1%
\$500,000 - \$999,000	4	0.1%
\$100,000 - \$499,999	56	2.0%
\$10,000 - \$99,000	562	15.6%
\$10,000	2,344	82.2%
TOTAL	2,850	100%





Key actions include:

- Development of a comprehensive supplier modern slavery risk assessment questionnaire and its application across material existing suppliers where expenditure exceeds \$200,000. Full review of higher risk supply chain in areas such as office cleaning, IT Hardware, textile/uniforms.
- Introduction of modern slavery questions in our internal “New Supplier” online request processes with additional screening for major new suppliers.
- Incorporate modern slavery terms and conditions into our standard form service and procurement agreements, including the publication of our modern slavery reporting channels through purchase order and remittance documents.
- Review all major information technology supplier agreements where technology products are sourced overseas in potentially higher risk areas.

STAFF AWARENESS AND EDUCATION

Improving the level of understanding of Modern Slavery is fundamental to improving our effectiveness in monitoring and managing the risks across our operations. We recognise that our risk mitigation actions will be ineffective without improving the understanding of its risks, how modern slavery can manifest itself within our operational activities and supply chains.

Key actions include:

- Staff induction processes will be expanded to incorporate online training in modern slavery as part of our standard induction and compliance training and compliance refresher programs.
- A Modern Slavery Policy (under development) will be issued and form part of new staff induction and compliance acknowledgement.





5. ONGOING EFFECTIVENESS MEASURES

Managing Modern Slavery risks is an ongoing strategy which requires discipline, vigilance and ongoing review of our approach and ensuring we have well established reporting processes in place is a key outcome from this first statement.

The Chief of Governance and Compliance is the assigned executive who will coordinate quarterly reporting processes through the Modern Slavery Working Committee to the AKG Board, Quality, Integrity and Risk Committee.

To measure the effectiveness of this program the following measures have been identified for 2024.

- 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. This would include ongoing review of the number of open and closed incidents.
- Monitoring the number of existing material suppliers who have been reviewed and the number of findings which have been opened and closed. All new suppliers are screened through new modern slavery assessment processes.
- Establishment of Modern Slavery HR Policy and inclusion in all new staff onboarding compliance and review.
- Establishment of Modern Slavery staff training and education modules and the number of staff completing refresher programs.

As part of the annual publishing of the Modern Slavery 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 first statement a formal Modern Slavery Working Committee, comprising representatives across the Australian controlled entities was established. This committee led the analysis and development of this statement and approval by the Group CEO and AngusKnight Pty Ltd Board.

In addition, consultations were undertaken with international operations in the United Kingdom, Sweden, and Canada.

The CEO and the Board of AngusKnight Pty Ltd approved this statement in December 2023.





7. ATTACHMENT A – CONTROLLED ENTITIES

This Modern Slavery Statement includes all controlled entities of AngusKnight Pty Ltd within Australia.

Controlled Entity	Country of incorporation	Ownership
Telmari Pty Limited (Parent)	Australia	
A till O Jobb & Rekrytering AB	Sweden	100%
AngusKnight Institute Pty Ltd	Australia	100%
Angus Knight Learning Pty Ltd	Australia	100%
A Healthfind (UK) Ltd	United Kingdom	100%
Intuitive Thinking Skills Ltd	United Kingdom	100%
Jobfind Centres Australia Pty Ltd	Australia	100%
Jobfind LWB Pty Ltd	Australia	100%
Jobfind Sverige AB	Sweden	100%
Jobs 22 Ltd	United Kingdom	82%
Learning Sphere Training Solutions Pty Ltd	Australia	100%
Maximus Sweden AB	Sweden	100%
Simply One Stop Ltd	United Kingdom	100%
uLaunch Pty Ltd	Australia	100%
Victorian Fitness Academy Pty Ltd	Australia	100%