

PROBE GROUP

MODERN SLAVERY STATEMENT

FY21

AT THE HEART OF PROBE'S VALUES ARE PURPOSE, PEOPLE AND PASSION.

At Probe we are committed to acting ethically and improving our practices to combat slavery in accordance with the Modern Slavery Act 2018 (Cth) and to implementing effective processes to ensure, so far as reasonably possible, that modern slavery is not taking place in our business or operations and in any of our supply chains.

This is our second joint Modern Slavery Statement which sets out the steps the Probe Group have taken to address modern slavery risks in our business for the financial year ending 30 June 2021 in accordance with the Modern Slavery Act 2018 (Cth) and is made on behalf of Probe BPO 1 Pty Ltd and its wholly owned subsidiaries including, but not limited to, Probe Contact Solutions Australia Pty Ltd ACN 006 688 955, Probe Operations Pty Ltd ACN 624 615 925, Probe Asia Pacific Pty Ltd 86 082 618 148, Convai Pty Limited ACN 002 561 515, Convai New Zealand Limited, Probe Contact Solutions New Zealand Limited, Beepo Support Services Pty Ltd ACN 167 554 967, Beepo Inc, Probe's Microsourcing operations including

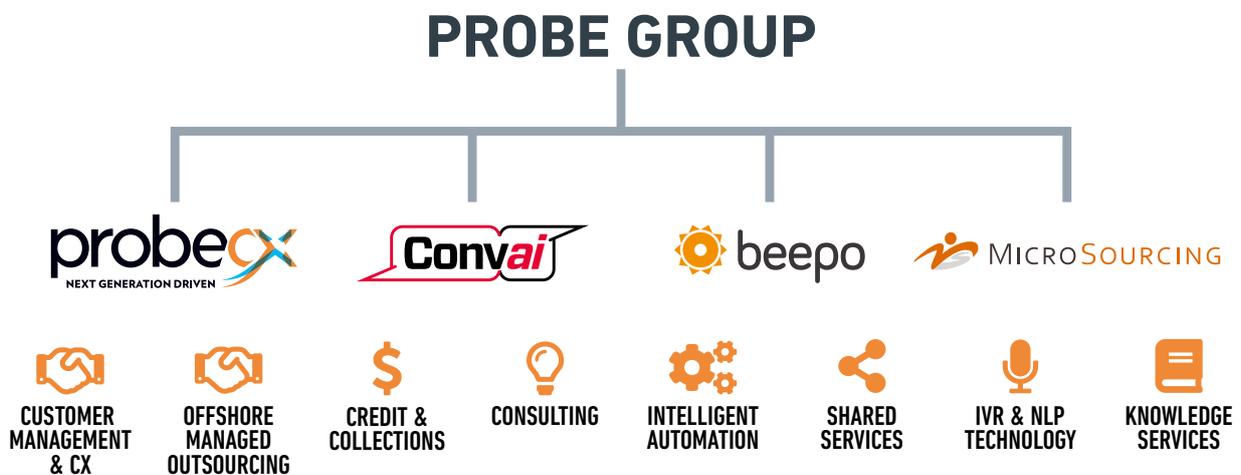
Microsourcing International Ltd, Probe Contact Philippines Inc, Probe Group Philippines Inc and Probe North America LLC. For the purposes of this joint statement, Probe or Probe Group refers to all reporting entities.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under Australian modern slavery legislation. We expect the same high standards from all of the contractors, suppliers and other business partners who do business with us.

OUR BUSINESS AND ORGANISATION STRUCTURE

We are proud to be a global provider of outsourced customer experience, sales, help desk and digitally-enabled contact centre services in the business process outsourcing sector, delivering a broad range of leading customer contact, end-to-end credit management and collections solutions to our valued clients.

Our tech-enabled, empowered, and engaged workforce delivers global customer contact solutions servicing 21 countries, seamlessly and reliably. Over 41 years, the combination of people, technology & our passion culture has driven us to deliver best-in-class contact centre environments, leading the way when it comes to customer experience, results, continuous improvement, innovation and insights.



In preparing this statement we have acted collaboratively and in consultation with wholly owned subsidiaries of Probe BPO 1 Pty Ltd with whom we make this joint statement by virtue of our Modern Slavery working group and consistent due diligence processes throughout our group established by our In-house Legal and Compliance team. As the entities within the Probe Group use similar policies and processes and operate in the same sector with many shared suppliers, we will provide a consolidated description of the actions our Group are taking to address modern slavery risks.

Our business is organised into 7 business units:

- **Contact Solutions**
- **Operations**
- **Field Services**
- **Collections**
- **Convai**
- **Microsourcing**
- **Beepo**

Our head office is based in Melbourne, Victoria. The Probe Group has over 15,000 employees and we deliver services in Australia, New Zealand, the United States and the Philippines.

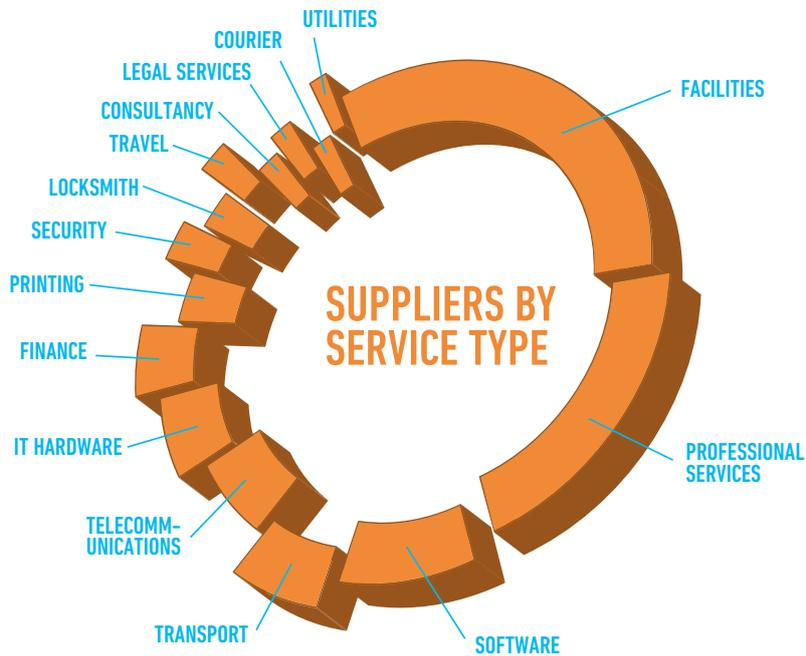
At Probe, we have a NEXT GEN culture which seeks to attract and retain reliable, respectful and ethical employees. Our people are central to achieving our vision of being the most sought after and respected Customer Management (BPO) services provider in the markets within which we choose to operate. Probe is committed to ensuring its people work under conditions that comply with all national, local and international labour standards and laws and codes of the countries in which it operates including, but not limited to, the ETI Base Code.

OUR SUPPLY CHAINS

In FY21, Probe Group worked with approximately 600 suppliers with the majority of our supplier spend occurring within facilities (includes office supplies and services), professional services and IT.

Due to the nature of our operations we have a relatively simple supply chain which includes goods or services needed for our day to day operations including office

supplies, office services (postage, cleaning, fire protection, security, waste disposal and maintenance services etc), leasing of facilities, IT infrastructure and software, office equipment, telecommunications and utility services and professional services (including external auditing and legal services, transport, locksmith, recruitment and consulting services).



KEY SUPPLIER SOURCE LOCATIONS



OUR POLICIES ON SLAVERY

We are committed to ensuring, so far as reasonably possible, that there is no modern slavery in our supply chains or in any part of our business. Probe’s commitment to anti-slavery is reflected in various corporate policies which seek to prevent dishonest or unethical conduct and fostering a culture of honesty and accountability including the following:

- **Recruitment Policy**
- **Corporate Social Responsibility Policy**
- **Procurement Policy**
- **Whistleblower Policy**

In 2021 we launched a stand alone Anti-slavery Policy which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in our supply chains.

This commitment is also reflected in our Supplier Code of Conduct. We require all Suppliers to act in a manner consistent with our XTRA philosophy including with xtra value, xtra performance and xtra integrity.

MODERN SLAVERY RISKS

Probe is committed to human rights and understands the important role our business plays in contributing towards the global elimination of modern slavery and human trafficking.

Probe Group procures a range of goods and services both from Australia and internationally. Probe Group conducted a risk assessment of modern slavery taking into account supplier geographical location and known industry risks.

We anticipate that due to our global operations our purchase of goods and services may potentially be susceptible to risks of modern slavery particularly in the areas of:

- the procurement of computer hardware which is manufactured offshore; and
- the procurement of labour in services, such as cleaning.

Probe did not identify any cases of modern slavery in our operations or supply chain within this reporting period.

Probe Group manage risks to our organisation by maintaining consistent risk mitigation processes to monitor for and avoid modern slavery in all environments in which we operate in. This includes undertaking due diligence on existing and potential suppliers and ensuring we have a robust training framework in place.

IMPACT OF COVID-19

As we prepare this statement, our business and our suppliers continue to deal with the impact of COVID-19. We recognise that human rights challenges have increased throughout 2021 due to the impact of the COVID-19 pandemic as workers in supply chains have likely become more vulnerable during this time and the majority of employees worked remotely.

A majority of Probe employees worked from home this year to enable employees to continue to work and earn a wage during this period and to provide continuity of services to Probe clients. We have invested in a health@work employee wellbeing dashboard to promote wellbeing and safety for employees working remotely given the long lock downs experienced by our employees. Communication has been a large focus in 2021 ensuring employees have access to up to date information on how to stay safe and minimise the risk of COVID-19.

The safety and wellbeing of our employees and visitors has been a primary focus this year with the increasing numbers of COVID-19 in the geographies in which we operate. Probe has complied with world health organisation recommendations and government health directions in order to protect employees and visitors during lockdowns.

With varying government support and policies on COVID-19 vaccination we have focused on

the impact of employees in the Philippines with surging COVID case numbers. We have implemented remote work arrangements to promote safe working practices and purchased vaccines and made these available for free to our Philippine employees. Health kits including PPE and multivitamins were sourced for some team members along with the option to use the company shuttle service where available to promote safety for team members. Onsite medical personnel as well as online assistance was also made available to support Philippine based team members.

Probe also made EAP services available to team members to promote and prioritise mental wellbeing and support for team members who were experiencing a range of challenges resulting from repeated lockdowns.

There has been an increased use of recruitment providers with the labour market shortage resulting from extended lockdowns and border closures. All employees have been engaged on award conditions.

With the rapid deployment to work from home there has been an increased need for computer hardware. All suppliers have been required to comply with Probe's Supplier Code of Conduct and have been subject to due diligence as part of Probe's Modern Slavery compliance framework.



DUE DILIGENCE PROCESSES FOR ETHICAL SUPPLY AND ANTI-SLAVERY

Probe is committed to implementing and maintaining standards of good governance where we undertake our business activities in an ethical and transparent manner consistent with applicable laws. This extends to the Suppliers with whom we do business.

We have in place systems to:

- **identify and assess potential risk areas in our supply chains;**
- **mitigate the risk of slavery occurring in our supply chains;**
- **monitor potential risk areas in our supply chains; and**
- **protect whistleblowers.**

As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain, we undertake a risk assessment of suppliers to identify and understand our modern slavery risks. As part of our supply chain risk analysis we seek to identify:

- suppliers and partners located in high risk countries where labour rights are not protected;

- suppliers and partners who we spend the most with in our supply chain;
- high-risk industries that have previously been affected by undeclared labour, illegal labour and/or a high incidence of trafficked persons;
- where there is temporary labour;
- where there are sub-contractors or temporary agency staff.

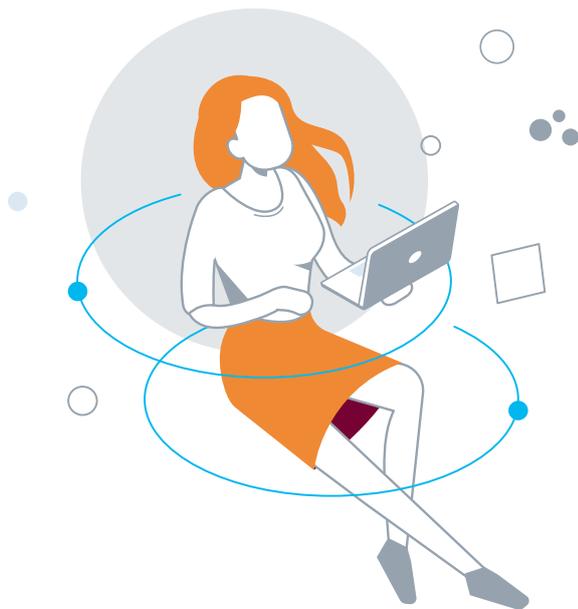
A risk rating is then attached of low, medium or high risk for each supplier/partner based on publicly available information about indicators of modern slavery.

In keeping with our standards of transparency and ethical conduct, we actively encourage everyone in our business to challenge any behaviour they believe is inconsistent with any of our values or our policies. The Probe Group also has mechanisms in place for employees or third parties to anonymously report suspected or actual improper conduct through our Whistleblower Policy. Protected disclosures can be made through internal reporting processes or via the Probe Group stopline service.

SUPPLIER ADHERENCE TO OUR VALUES

It is the expectation that all Suppliers act honestly, fairly and without prejudice in all business dealings, avoiding conflicts of interest and acting with integrity. Suppliers whether directly or through their supply chain, must comply with all applicable modern slavery laws, including not engaging in human trafficking, slavery, servitude, forced labour, debt bondage and child labour as noted above. Human rights abuses are not permitted in any form in our supply chain. Suppliers must have adequate processes in place to ensure that their supply chain comply with applicable laws relating to minimum wages, child labour and modern slavery including complying with any associated mandatory reporting requirements.

To ensure all those in our supply chain and contractors comply with our ethics we have established a Supplier Code of Conduct which details the standards expected of our Suppliers and their supply chains, when providing goods and services to or on behalf of the Probe and applies to any third party providing products or services to or on behalf of Probe. Our Supplier Code of Conduct was reviewed this year to ensure it continues to remain relevant to the standards expected of Probe suppliers. The Supplier Code of Conduct is published on our Probe Group website and is an important part of our approach to ethical and responsible procurement.



TRAINING

Training is a fundamental part of Probe’s efforts to raise awareness and to implement anti-slavery and corporate social responsibility policies effectively.

To promote employee awareness all employees who are involved in procuring goods and services are required to complete Probe’s Modern Slavery compliance training module. Probe’s training and awareness program seeks to ensure that team members involved in sourcing goods and services have an understanding of what is modern slavery and how to spot risks and report incidents.

OUR ACTIONS & ACHIEVEMENTS

We are proud of the steps we have taken to combat modern slavery within our operations. Measures we have implemented in FY21 include:

Probe continues to map key suppliers by location and spend. All high risk suppliers have been assessed for modern slavery related risk.

Due diligence has been undertaken on nominated suppliers who were required to complete a questionnaire that was reviewed by Probe's Legal and Compliance Team.

Membership with SEDEX.

A critical development in our modern slavery response over the past year has been our finalisation of Probe's Ethical Supply and Anti-Slavery Committee. This brings together representatives from all Probe businesses including employees who represent key functions.

Our Policy has been published. It reaffirms Probe's commitment to minimise the risk of modern slavery in our supply chain. Human rights are incorporated into our corporate policies.

We conducted a comprehensive modern slavery risk review to understand existing and emerging risk areas. All suppliers have been classified with a risk rating. We have approximately 600 suppliers and approximately 66% have been assessed as low risk.

Training and awareness has been another important pillar in our modern slavery due diligence. We have successfully developed the awareness and knowledge of our employees who are engaged in the procurement of goods and services to ensure that their decisions and actions align with Probe's commitment to respect human rights.

EFFECTIVENESS IN COMBATTING SLAVERY

We are committed to continuous improvement and looking at how we can improve our modern slavery framework. We are tracking the effectiveness of our actions through our Anti-Slavery and Ethical Supply Committee. The Committee is responsible for, amongst other things, tracking and reviewing our progress on implementation of modern slavery initiatives and achievement of anti-slavery goals.

With the impact of COVID-19 we continue to focus on training completion and evaluating the best options for measuring the effectiveness of our modern slavery initiatives and actions. These are two initiatives that were partially completed in FY 21. We are considering engaging a third party in FY 22 to assist us in

assessing the effectiveness of our due diligence framework and initiatives. Key performance indicators which were achieved included 100% of suppliers being assessed for modern slavery risk, the publication of Probe’s Anti-Slavery policy and the establishment of Probe’s Ethical Supply and Anti-Slavery Committee.

The effectiveness of efforts to minimise the risk of modern slavery will be regularly assessed and reviewed by our Ethical Supply and Modern Slavery Committee who meet on a quarterly basis. One of our core key performance indicators for FY 22 is the education of our suppliers through a modern slavery infographic which will be shared with our Supplier Code of Conduct at engagement of new suppliers.

Area	Item	Measurement or Effectiveness
Awareness	<ul style="list-style-type: none"> Ensuring modern slavery awareness training is provided for all staff engaged in procuring goods or services to raise awareness and to implement Probe’s anti-slavery policies effectively. 	<ul style="list-style-type: none"> Number of relevant staff who have received training on modern slavery risks.
Policies	<ul style="list-style-type: none"> Ensuring applicable Probe policies confirm Probe Group expectations in regards to preventing modern slavery in Probe’s operations and supply chains. 	<ul style="list-style-type: none"> Policies reviewed annually to identify any opportunities for improvement. Supplier access to Probe policies related to modern slavery.
Supply Chain Register and Due Diligence	<ul style="list-style-type: none"> Monitoring of supply chain with maintenance of Probe Group supplier register. 	<ul style="list-style-type: none"> Percentage of suppliers who have been assessed for modern slavery risks. Completion of modern slavery questionnaires where identified as required from modern slavery risk rating.
Risk Management	<ul style="list-style-type: none"> Understanding exposure both within Probe Group operations and externally in our supply chain. 	<ul style="list-style-type: none"> Completion of annual risk assessment.

PROBE GROUP GOALS TO FY22

Following a review of the effectiveness of the steps we have taken this year to minimise the risk of slavery in our operations and supply chains we have committed to taking the following further steps to combat slavery in our supply chain in FY22 and build upon the work completed in 2021:



Review and update our Procurement Policy including implementation of due diligence of suppliers during onboarding and consideration of how their compliance with modern slavery regulations would be monitored.



Update our Recruitment Policy to reference debt bondage and mandatory terms for recruitment providers including that candidates must never be required to leave cash deposits, passports, visa or bank cards in order to engage in work.



Work with the People Team to focus more heavily on modern slavery risks in internal operations such as recruitment and the use of external agencies.



Strengthen our contracts with suppliers and introduce standardised supplier clauses where possible.



Ensure all suppliers are assessed on an annual basis and that risk assessments are performed for new suppliers as part of the onboarding process.



Prepare a Modern Slavery information sheet/infographic for small suppliers and how modern slavery might affect their businesses.



Review our Supplier Code of Conduct to ensure it remains relevant and up to date while considering any trends in modern slavery issues and the risks posed to Probe Group.



Prepare a modern slavery specific risk register and include modern slavery risks as part of our Group Risk Register.

The effectiveness of our program will be measured in FY22 based on implementation of the above initiatives.

Consistent with our “doing it better” approach we are committed to continuously review the initiatives we have implemented as a group to minimise the risk of modern slavery within our supply chain.

This joint modern slavery statement is made by Probe BPO 1 Pty Ltd and its wholly owned subsidiaries and was approved by the Probe Group Board of Directors on 18 November 2021.

Andrew Hume
CEO

Probe BPO 1 Pty Ltd
18 November 2021

MODERN SLAVERY STATEMENT 2021

REFERENCE SCHEDULE

Clause	Mandatory Criteria	Reference in Probe's Statement
1(a)	Identify the reporting entity	Page 2 - 'Probe entities are listed'
1(b)	Describe the structure, operations and supply chains of the reporting entity	Page 2 - 'At the Heart of Probe's Values and Purpose, People and Passion' Page 3 - 'Our Business and Organisation Structure' Page 4 - 'Our Supply Chains'
1(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Page 5 - 'Modern Slavery Risks'
1(d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Page 7 - 'Due Diligence Processes for Ethical Supply and Anti Slavery' Page 9 - 'Our Actions and Achievements'
1(e)	Describe how the reporting entity assesses the effectiveness of such actions	Page 10 - 'Effectiveness of Combatting Slavery'
1(f)	Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14--the entity giving the statement	Page 3 - 'Our Business and Organisation Structure'
1(g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Page 5 - 'Our Policies on Slavery' Page 6 - 'Impact of COVID-19' Page 8 - 'Supplier Adherence to Our Values' Page 9 - 'Training'
2(a)	A modern slavery statement, other than a statement to be given under section 15 (Commonwealth modern slavery statements), must include (a) for a statement to be given under section 13 (modern slavery statements for single reporting entities)--details of approval by the principal governing body of the reporting entity; or	N/A
2(b)	for a statement to be given under section 14 (joint modern slavery statements): (i) details of approval by the relevant principal governing body or bodies; (ii) if subparagraph 14(2)(d)(iii) applies--an explanation of why it is not practicable to comply with subparagraph 14(2)(d)(i) or (ii).	Page 11 - 'Probe Group Goals to FY22' confirms the statement has been approved by the Probe Group Board of Directors.