



# MODERN SLAVERY STATEMENT

# INTRODUCTION

Bayside BWE Pty Ltd (the Group), as informed by the Modern Slavery Act 2018, aims to mitigate the risk of modern slavery in our business operations and through our supply chain.

As labour hire, harvest trail services, recruitment and secondment solutions are components of our service offering, we have assessed their potential operational risks. Our existing practices and governance frameworks are cognisant of modern slavery elements, in line with Australian employment legislation. However, we recognise that our responsibilities lie beyond legally compliant practices across our operations.

This Statement identifies new and ongoing risks, explaining the actions that the Group has taken to assess, address and prevent modern slavery within our business operations and supply chain in the 2020-2021 financial year, as well as highlighting our focus for the 2021-2022 Australian financial year.

# GROUP STRUCTURE



NB: During the pandemic we consolidated some entities and brands into existing entities, as represented by the above structure and ABN's.

# OUR OPERATIONS & SUPPLY CHAIN



OUR SERVICES	OUR PEOPLE	OUR SUPPLIERS
On-hired Employment, Permanent Recruitment, Harvest Trail Services, Training & Upskilling	Workforce Management Consultants, Recruitment Consultants, Associate Consultants, IR Specialists, Health & Safety, Management, Payroll	Technology, PPE & Equipment, Stationery & Office Supplies, Printers, Catering, Facilities Maintenance, Car Manufacturers, Consultants
On-hired Employment, Permanent Recruitment, International Sponsorship (482 Visas), Employment Compliance, Workplace Relations Consulting	Workforce Management Consultants, Recruitment Consultants, Associate Consultants, IR Specialists, Health & Safety, Management, Quality Systems, HR, Marketing & Communications	Technology, PPE & Equipment, Stationery & Office Supplies, Catering, Facilities Maintenance, Car Manufacturers, Consultants
Engineering & Design, Project Management, Detailing & Drafting, Surveying & Geospatial, 3D Scanning & Modelling, Asset Location & Assessment, Soil Testing	Engineers, Drafters, Project Managers, Surveyors, Auditors, Designers, Trainees, Administrators, IR Specialists	Technology, PPE & Equipment, Stationery & Office Supplies, Printers, Catering, Facilities Maintenance, Car Manufacturers, Consultants
IT Managed Services IT Consulting	IT Support, IT Specialists	Technology, PPE & Equipment, Stationery & Office Supplies, Printers, Facilities Maintenance

# MODERN SLAVERY RISKS

## OUR OPERATIONS

### **Compliance as a Labour Hire provider**

Bayside Group and Acclaimed Workforce engage and on-hire workers to perform work for a client, with the client considered a 'host employer'. As such, we assume all legal, moral and ethical obligations associated with being an employer.

Our ISO 9001 certified management system and applicable Labour Hire Licensing guidelines are designed to ensure compliance and are regularly audited. To further mitigate risks, wages are checked by our payroll team and award classifications audited by our workplace relations experts to ensure alignment with the Fair Work Act. Our AS/NZS 4801 management systems help to keep our workers safe, with regular Workplace Assessments and Job Safety Analysis conducted.

### **Harvest Trail**

As a supplier to the Department of Education, Skills and Employment (DESE) for the Hunter Central West (NSW), we adhere to strict guidelines and submit regular reports. Our role is to source and refer workers only, not to employ them. We have a Horticultural Award Summary available on our website to ensure employers and workers understand their rights, and encourage workers to call us if they have any concerns. Our Whistleblower Policy allows for anonymous reporting if preferred.

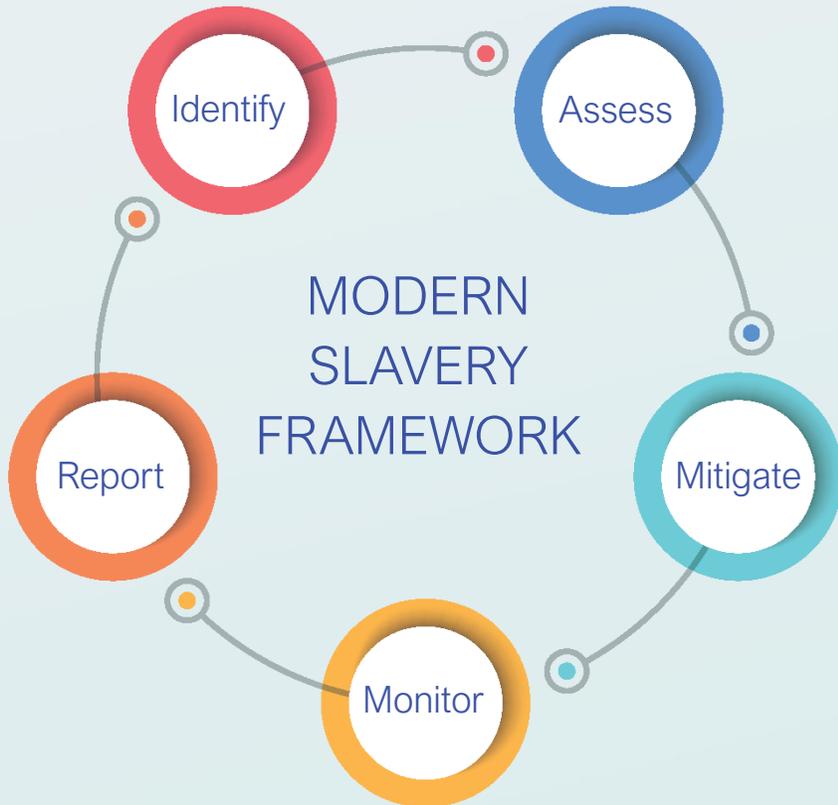
## OUR SUPPLY CHAIN

As a paperless, services organisation, our supplier numbers are relatively small. However, we are committed to mapping our supply chain to reduce risks, and have worked to incorporate all suppliers into a centralised database.

As a result, we created and implemented a new Sustainable Procurement Policy that aligns with the UN Compact Principals and the Modern Slavery Act 2018, aligning the number of suppliers with business needs and values in the process. Personal Protective Equipment, Stationery and Technology providers were identified as our highest risk areas in the 2020-21 financial year, and we started liaising with key organisations in relation to this new policy and our expectations. Robust discussions about the supply chain have been held and a Supplier Evaluation Questionnaire completed, providing evidence of supplier policies in relation to Modern Slavery.

However, we recognise this is a starting point only. This same process needs to be conducted across all suppliers in order to mitigate risk.

# ACTIONS TO MITIGATE MODERN SLAVERY RISKS



## 2020-2021 FY

As determined in our first statement, our focus has been to identify and assess our core risks and ensure mitigating actions are monitored, integrating the principles of our Modern Slavery Statement into our current systems. Key actions included:

- ✓ Identifying, centralising and rationalising our current supplier base.
- ✓ Developing a Sustainable Procurement Policy and introducing a Supplier Evaluation Questionnaire.
- ✓ Discussing business operations in relation to modern slavery with those suppliers identified as higher risk, predominantly Personal Protective Equipment and Technology suppliers.
- ✓ Reviewing our Terms of Business and new Preferred Supplier Agreements to ensure alignment with our Statement.
- ✓ Developing a Horticulture Award Summary for employers, also available to casuals via our website to help them understand their rights.
- ✓ Submitting an annual report as required under the Modern Slavery Act 2018.

# ACTIONS TO MITIGATE MODERN SLAVERY RISKS

## FUTURE COMMITMENTS

We recognise that identifying, assessing, mitigating and monitoring modern slavery risks in our operations and supply chain is ongoing, and have a Modern Slavery Committee in place to ensure we as a business remain diligent.

Our focus in the 2021-22 financial year is to:

1. Ensure all relevant suppliers complete our Supplier Evaluation Questionnaire.
2. Introduce a Supplier Code of Conduct and review our Procurement Procedure.
3. Develop a process for acting on suspected incidents of Modern Slavery.
4. Conduct further training for our employees to improve their understanding of potential incidences of modern slavery, and of our organisational policies.
5. More widely communicate options for reporting to our workforce and Harvest Trail participants.

## APPROVAL & CONSULTATION

This Statement is a joint statement submitted by Bayside BWE Pty Ltd on behalf of its related entities. Consultation by the Modern Slavery Committee took place with relevant operational and corporate services executives, and the board of directors.

This Statement was approved by the board of directors on 22<sup>nd</sup> December 2021 and is made pursuant to the Modern Slavery Act 2018 (Cth).



Robert Blanche  
Director & CEO  
Bayside BWE Pty Ltd