

## PO.PC.030 | Modern Slavery Reporting | FY2019-2020

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## 1 Modern Slavery Statement

Making Happier Humans is the ethos that builds our organisation to be who we are today. Through our growth and expansion, this ethos is what grounds our people, clients, stakeholders, and shareholders.

Subject to the Modern Slavery Act 2018, RXP Group (including its subsidiary The Works, is always committed to operating lawfully and ethically. This commitment extends to working with clients and suppliers who are aligned to our values and are compliant with the Act.

At RXP Group assessing risks begins with understanding basic human rights and how serious exploitation can occur anytime during the different lifecycle of our engagement. Our supply chain is relatively simple in that we provide consulting services for our clients. We employ resources from our local Australian market and where there has been a shortage of skills supply, we occasionally hire skilled workers from other countries through visa sponsorship. Other day-to-day operations includes training, providing support services, business travels and procuring office supplies.

In support of this approach, RXP Group maintains our due diligence by observing and reviewing our approach and policies for Modern Slavery (and other policies supporting this statement) to ensure compliance with all applicable Modern Slavery laws. Other policies that help RXP Group govern our compliance includes, whistle-blower policy, procurement policy, workplace, health, and safety policy.

## 2 Reporting Entities

All subsidiaries associated with RXP Services are integrated as part of RXP Group and operates as departments within the group. RXP Group offices are located in Hobart, Melbourne, Sydney, Canberra, and Hong-Kong.

	Country of incorporation	Percentage owned	
		2020	2019
<b>Parent Entity:</b>			
RXP Services Limited	Australia		
<b>Subsidiaries of RXP Services Limited</b>			
Vanguard Integration Pty Ltd	Australia	100%	100%
Fluid Thinking Pty Ltd	Australia	100%	100%
Infuse IT Pty Ltd	Australia	100%	100%
RXP Services Limited	Hong Kong	100%	100%
NSI Technology Pty Ltd	Australia	100%	100%
Zenith Solutions (Aust.) Pty Ltd	Australia	100%	100%
Transpire Pty Ltd	Australia	100%	100%
MethodGroup Consulting Pty Ltd	Australia	100%	100%
Integrated Value Pty Ltd	Australia	100%	100%
Insight4 Pty Ltd	Australia	100%	100%
Aptus International Pty Ltd	Australia	100%	100%
Centrum Systems Pty Ltd	Australia	100%	100%
Engage Viidacom Pty Ltd	Australia	100%	100%
The WorksMelbourne Agency Pty Ltd (formerly Nobel Consulting Pty Ltd)	Australia	100%	100%
The WorksSydney Pty Ltd	Australia	100%	100%
Daresay Pty Ltd	Australia	100%	100%

## 3 Policies and Governance

### **Code of Conduct**

RXP Group's Code of Conduct outlines the standard and expectation that governs our operations and acts as a guiding principle for all who work and represents RXP Group to act respectfully, ethically, and lawfully regardless of business pressure.

### **Procurement Policy**

RXP Group's Procurement Policy outlines the expectations and commitment to enforce an ethical approach of supplier engagement regarding human rights, sustainability, Workplace Health and Safety, Equal Employment Opportunities and Anti-Bribery/Anti-Corruption regardless of business pressures.

### **Whistle-Blower Policy**

RXP Group does not condone any collusion of bribery or corruption. This document sets forth the standards that we uphold as an organisation that operates based on integrity and highlights a key approach in how, who and where employees or suppliers can escalate their complaint to whistle-blow on any suspected or real unethical practices.

### **Environmental (Sustainability) Policy and Guidelines**

RXP Group is committed to protecting our environment. We do this by embedding environmentally sustainable practices in our day-to-day operations and encourage our people to make a personal commitment to contribute positively to our environment. This Environmental Management System (EMS) is aimed to provide all in the business with a clear policy and guidelines on RXP's approach when managing, minimising, or eliminating negative environmental impacts (direct or indirect) during our operations.

### **Complaint Handling Policy and Guidelines**

RXP Group is committed to enforcing a safe and inclusive working environment; this policy and guidelines were developed to ensure that each dispute resolution process including complaint handling adheres to the relevant law/legislation and is conducted with integrity, timeliness, confidentiality and fairness.

### **Governance**

RXP Group sees the issues pertaining to modern slavery and human rights to be something that the company can't solve alone, our business can no longer think about the risk and social impact of relevant business operations separately. As such the approach that's been taken is that all suppliers, employees, those who are engaged, represent, and work with RXP are required to be aware of and partake in the management of ethical practices. We operate under a shared value that strongly rejects modern slavery, non-compliance to EEO, bribery or corruption, and non-sustainable environmental practices.

Within RXP Group's internal team, the Executive, Senior Leadership team and all other members of the organisation who plays a part in leading and managing our suppliers and procuring talent (operations, Talent Acquisition, People & culture) commits to and are responsible (directly or vicariously) for compliance with the Modern Slavery Act by adhering to the following actions:

- I. Demonstrate the understanding of what constitutes Modern Slavery and all applicable laws to this Act.
- II. Enforce this knowledge by assessing potential and actual risks within our operations and supply chain.
- III. Review and comply with all applicable policies that govern and mitigate risks of modern slavery.
- IV. Raise awareness and conduct regular training for all employees to adhere to modern slavery requirements.
- V. Conduct due diligence by reporting relevant risk assessment promptly.
- VI. Review all contracts (for suppliers and employees) to ensure adherence and relevance to the changing legislation. Particularly to ensure that the terms of each contract are consistent with the requirements of the Modern Slavery Act.
- VII. Understand the source and address potential or actual modern slavery risks identified, by setting up regular checks and escalation process.
- VIII. Creating a measure to monitor the performance and effectiveness of actions taken.

## 5 Risk Mapping

RXP Group conducts its due diligence to identify risks of modern slavery in our supply chain. After a thorough assessment, we have identified that the real risks (although considered low risks) lie with the way workers are engaged by RXP and the following are the risks:

- a) Vulnerable group of workers: RXP Group occasionally employs migrant and base skilled workers to meet our talent demands where there is a skills shortage.
- b) High-risk work practices: RXP Group occasionally engages labour-hire companies (i.e. recruitment agencies) to source and fill our talent demands where there's a requirement to do so, whether due to time constraints or due to a requirement for specific skills that are not easily available in the market.
- c) Procurement of corporate goods: RXP Group would occasionally conduct company events requiring branded souvenirs or catering for these events; we also purchase office goods supplies for basic office needs and laptops/company assets.

## 6 Actions Taken

RXP Group operates with a mindset of continuous improvement. We scrutinise our policies, processes and conduct our due diligence annually or more regularly (as required) to ensure compliance with changing legislations. Pertinent to the risks identified, we have taken the following steps to ensure mitigation and deterrence to non-compliance:

- a) **The hiring migrant workers**
  - In RXP, most of the hiring is conducted by our in-house Talent Acquisition team who works closely with our hiring managers and the People & Culture team. We provide regular training around Equal Employment Opportunity, mobility/visa requirements and

any other relevant employment-related training (at least once every 3 months) to both the Talent Acquisition team and Managers who are involved in the hiring process.

- Hiring Process: we have a standard contract and regulated approach where this is all recorded in our ERP – Workday when any new hires are conducted.
  - For anyone who requires a visa, we engage an independent Immigration Lawyer/specialist that provides us with advice on the lawful approach and terms of engagement in adherence to all applicable current legislation (this includes remuneration and conditions of work).
  - Once their legal working rights in Australia are obtained, all migrant employees receive a standard employment contract and are onboarded the same way as non-migrant employees.
  - The onboarding and induction process includes the provision of information on Fair Work’s Information Fact Sheets, completion of all onboarding documents (TFN, Superannuation form, TFN form and 100 points ID checks, Visa details and Onboarding policies).

**b) Labour-hire Engagement**

- Very occasionally RXP Group utilise the services of a labour-hire company that helps procure talent for our projects.
- This engagement is a business-to-business arrangement, where RXP and the agency bind our adherence to the relevant legislation through a Subcontractor Agreement and work-order that stipulates the working period for when we require the talent services for.
- The worker engaged through any labour-hire firms are considered independent contractors and are inducted in the same manner as any other RXP employees.
- As part of the engagement process, both the labour-hire company and the talents that are procured for RXP Group are asked to accept and adhere to the relevant company policies, especially those that are listed in part 3 of this report under Policies and Governance.

**c) Procurement of Corporate Goods**

- RXP Group would occasionally service events for marketing purposes or internal activities which often requires the procurement of corporate souvenirs or catering, we also procure basic office goods and assets (printer, laptops, keyboards, etc).
- RXP Group’s preferred suppliers for these types of goods are procured from reputable Australian Companies, whose operations and business practices are available in public (Coles, Woolworths, etc). We do not engage with or utilise services that are offshored.

## 7 Effectiveness of Actions

RXP Group is only beginning to develop clearer processes and policies that can help us to continuously improve in this endeavour. We have not yet explored specific KPIs that will help us to track the effectiveness of our approach, however, the current existing processes and our annual due diligence checks have provided us with some insights into our performance and where there is room for improvements. Some examples include:

- Grievance processes (as per the whistle-blower and complaint handling policy) that provide guidelines in how internal, suppliers, and externals can make a complaint regarding any suspected, alleged, or real unethical practices.
- Regular engagement (twice yearly) of independent statutory auditors to review our internal processes, policies, and all business practices and suggests improvements where required.
- Annual reviews by the People and Culture team on all people-related processes, policies, and conduct, especially in areas where risks have been identified and actions required (hiring and engagement of labour-hire). The People and Culture team would consult with the relevant departments to ensure that key issues are identified, and gaps are being addressed through a detailed action plan.

## 8 Future Outlook

RXP Group is committed to a continuous effort of respecting human rights and increasing the awareness of modern slavery. We will continue to conduct our due diligence and consult with key stakeholders to ensure that we’re addressing the gaps from where risks of modern slavery may arise.

## 9 Modern Slavery Statement Approval

This statement was approved by the Board of Directors of RXP Group on 5 April 2021.

***Adrian Fitzpatrick***

Director | RXP Group  
5 April 2021

***John Pittard***

Chair of the Board | RXP Group  
5 April 2021

***Ross Fielding***

Managing Director | RXP Group  
5 April 2021

<b>BMS</b>	RE.PC.001 Modern Slavery Reporting   FY2019-2020
<b>Approver</b>	Maria Dimopoulos, Group Executive - People & Culture
<b>Endorsed by</b>	Ross Fielding, CEO
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