



ALLEGIS
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Modern Slavery Statement

Reporting Period: 2023



Introduction

This joint statement on modern slavery ('Statement') is made by Allegis Group APAC Holdings Pty Ltd (ACN 159 406 523), pursuant to sections 14 and 16 of the Modern Slavery Act 2018 (Cth) ('the Act') for the financial year ending 31 December 2023 and covers Allegis Group Australia Pty Ltd (ACN 105 143 324) ('Allegis Group', 'we', 'our', or 'us').

This Statement addresses Allegis Group's obligations and compliance in relation to the Act and applicable state legislation, and highlights the steps we take to ensure there is no incidence of modern slavery or human trafficking within Allegis Group or our supply chains.

Allegis Group is opposed to human rights abuses in all our operations – whether direct, indirect, or in our supply chain. We are committed to continuously improving our practices to combat modern slavery and human trafficking, to ensure that these do not take place in any part of our business or supply chains. Allegis Group strives to conduct all our business in an honest and ethical manner and in accordance with the letter and spirit of applicable legal and regulatory requirements in the jurisdictions in which we carry out our operations.

Our Structure & Operations

Allegis Group APAC Holdings Pty Ltd is a wholly owned subsidiary of Allegis Group Inc., a privately held US company. Allegis Group Australia Pty Ltd is a majority owned subsidiary of Allegis Group APAC Holdings Pty Ltd and is also a reporting entity for the purposes of the Act. The information set out in this Statement also covers our operational entities in Australia, and New Zealand. A list of these entities is included in Appendix 1 to this Statement.

Allegis Group provides both permanent and contract-based resources, offering specialized and client focused staffing solutions and consulting services to a wide range of household names and smaller businesses.

Allegis Group goes to market with a range of brands including Aston Carter, TEKsystems, Aerotek, and Allegis Global Solutions which enable us to offer a broad selection of staffing and services solutions across different industries including Government Services, Financial Services, and Information Technology. We have over 100 internal employees across Australia and New Zealand. This excludes individuals who are assigned to our clients.

Our Supply Chains

Our supply chain includes the sourcing of candidates for onward supply to our clients predominantly in the Government Services, Financial Services, and Information Technology sectors. We expect our suppliers and potential suppliers to operate in an ethical, legally compliant, and professional manner. We also expect our suppliers to maintain the same standards in their inward supply chain. Our inward supply chain includes:

- Facilities Management
- Communications and IT services
- Office Equipment and Supplies
- Utility services
- Professional services such as lawyers, tax advisors etc.

Modern Slavery Risks

Allegis Group sources roles for and provides only white-collar workers to its clients. We do not provide blue-collar workers, nor do we routinely supply workers to high-risk sectors such as meat processing or cleaning and security. Therefore, we have assessed that there is a limited risk of modern slavery in our onward supply chain.

We consider the greatest risk of slavery and human trafficking exists in our inward supply chain where operations and management oversight are beyond our control.

We assess our risks based on below parameters:

Sector and industry risks

Some of the industries which are identified as having potential risks of modern slavery are meat processing, horticulture, and facility management. Our risk, however, is relatively limited since we do not routinely supply workers to these sectors. We only supply white collar workers to sectors (such as Government Services, Financial Services, Information Technology) where risks of modern slavery are relatively low.

Product and Services Risks

Products that have a higher element of risk include electronics, office supplies, and marketing materials. This is an indirect risk since we procure these products from our suppliers and not directly from the manufacturers. Services such as office security and cleaning also pose a modern slavery risk because these are mainly sourced from facility management vendors.

Geographic Risks

While there are some countries in our inward and outward supply chain that may exhibit a higher prevalence of modern slavery, the affected industries and products in these countries are limited to those identified above. We further mitigate this risk by a careful selection of clients and suppliers.

Entity Risks

We are currently not aware of any entity which we engage with, that poses any entity-specific modern slavery risks. We expect to identify such risks through the research and inquiries performed on clients and suppliers prior to engagement.

Action taken to address Modern Slavery Risks

Following are the measures that we have taken to address Modern Slavery Risks:

Updated supplier onboarding formalities

We have introduced the below steps before engaging with a prospective supplier:

1. Allegis' Business Manager ("BM") must complete the New Supplier Request form that lists out details about the Supplier entity and the relevant transaction;
2. The Accounts Payable ("AP") team approves New Supplier Request. The AP team then requires the Supplier to complete an online modern slavery questionnaire ("Questionnaire").
3. The AP team then examines the Suppliers with low scores on the Questionnaire and report their findings and recommendation to the Finance Directors ("Directors"). If the Directors feel there is a high risk in onboarding the Supplier, then the Directors will evaluate the onboarding of the Supplier after consultation with the relevant BM.

Modern Slavery Questionnaire

Each supplier must review and complete the Questionnaire to share information about their efforts to prevent and address any potential modern slavery risks.

The suppliers' responses to the Questionnaire are used to identify, assess, and mitigate modern slavery risks in our supply chain.

The New Supplier Request form and Questionnaire are mandatory requirements for engaging suppliers, and our Supplier Policy has been updated to reflect this. These documents have also been uploaded to our intranet server which is accessible to everyone within the organisation.

Contractual compliances

Sample clauses have been prepared which obligate a supplier to:

- (a) comply with the requirements of the Act as well as our internal policies (including our Global Code of Conduct and Supplier Code of Conduct);
- (b) take all reasonable steps to identify and mitigate the risks of any modern slavery practices in their operations and supply chain, including providing suitable training to appropriate personnel;
- (c) report, redress, and remediate any modern slavery practices discovered in their operations and supply chain.

Each BM has been apprised of the importance of these contractual obligations and instructed to incorporate these clauses in all supplier contracts.

Assessing the effectiveness of the steps taken

Allegis Group reviews the effectiveness of its processes on modern slavery as below:

Engagement with suppliers

Allegis Group engages with its suppliers, contractors, and clients to ensure a healthy dialogue is in place that promotes continuous evolution in our processes against modern slavery.

Staying up to date

Allegis Group observes global trends and events to assess the efficacy of our current processes and policies in mitigating new and emerging risks of modern slavery.

Maintain Labour Hire Licences in Australia

Allegis Group entities held labour hire licenses in Queensland and Victoria during the reporting period. The broad objectives of the Australian labour hire licensing schemes are to protect workers from exploitation by labour hire providers and their clients; to improve the transparency and integrity of the labour hire industry; and to promote responsible practices in the industry. Licence holders are required to meet strict fitness and propriety standards, compliance tests, as well as comply with reporting requirements.

Consultation and Approval

Allegis Group created a taskforce comprised of members from different entities and functions to provide recommendations and advise on the preparation of this Statement, and actions to prevent modern slavery in our supply chains.

Further steps and Remediation

For the next reporting period, Allegis Group intends to:

- continue the audit compliance by BMs and suppliers with the New Supplier Form and Questionnaire;
- continue the review of suppliers' responses to the Questionnaire to ascertain whether any updates are required;
- set up a guideline document that has details about our standard positions in procurement contracts and will include details about legal requirements of Modern Slavery in it.

This Statement was approved by the boards of Allegis Group APAC Holdings Pty Ltd and Allegis Group Australia Pty Ltd on 26 June, 2024.



Helen Ahlstedt, Director
Authorised Representative

Date: **27 June 2024**

Appendix 1

List of Operational Entities in Allegis Group in Australia and New Zealand (as on 01 June, 2024)

- Allegis Global Solutions (Australia) Pty Ltd
- Allegis Group Australia Pty Ltd
- Allegis Services Australia Pty Ltd
- Allegis Group New Zealand Limited

