

Out-Sourcing



MODERN SLAVERY STATEMENT 2021

This statement covers the activities of Outsourcing Oceania Holdings Pty Ltd (ABN 20 628 356 141) and its controlled entities in understanding and implementing actions to minimise the risk of modern slavery in our operations and supply chain.

SECTION 1: INTRODUCTION

This is the first Modern Slavery Statement for Outsourcing Oceania Holdings Pty Ltd under the Modern Slavery Act (Cth) 2018 (the “Act”).

The purpose of this statement is to outline our approach to ensuring that Outsourcing Oceania Holdings Pty Ltd and controlled entities (together, the “Outsourcing Oceania Group”) has adequate frameworks and processes in place to minimise the risk of modern slavery throughout our business operations and supply chain.

At the Outsourcing Oceania Group, we recognise that slavery and human trafficking can occur in many forms, as considered in the Act. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

The Outsourcing Oceania Group is committed to operating responsibly and establishing and adhering to ethical standards which support United Nations Sustainable Development Goals, in particular Goal 8: inclusive and sustainable economic growth, full and productive employment and decent work for all. We strongly support this goal with the commitment in working to eradicate the many forms of modern slavery.

SECTION 2: OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Outsourcing Oceania Holdings Pty Ltd (ABN 20 628 356 141) is an Australian entity which was registered in August 2018. Outsourcing Oceania Holdings Pty Ltd is fully owned by Outsourcing Inc, a public company listed on the Tokyo stock exchange.

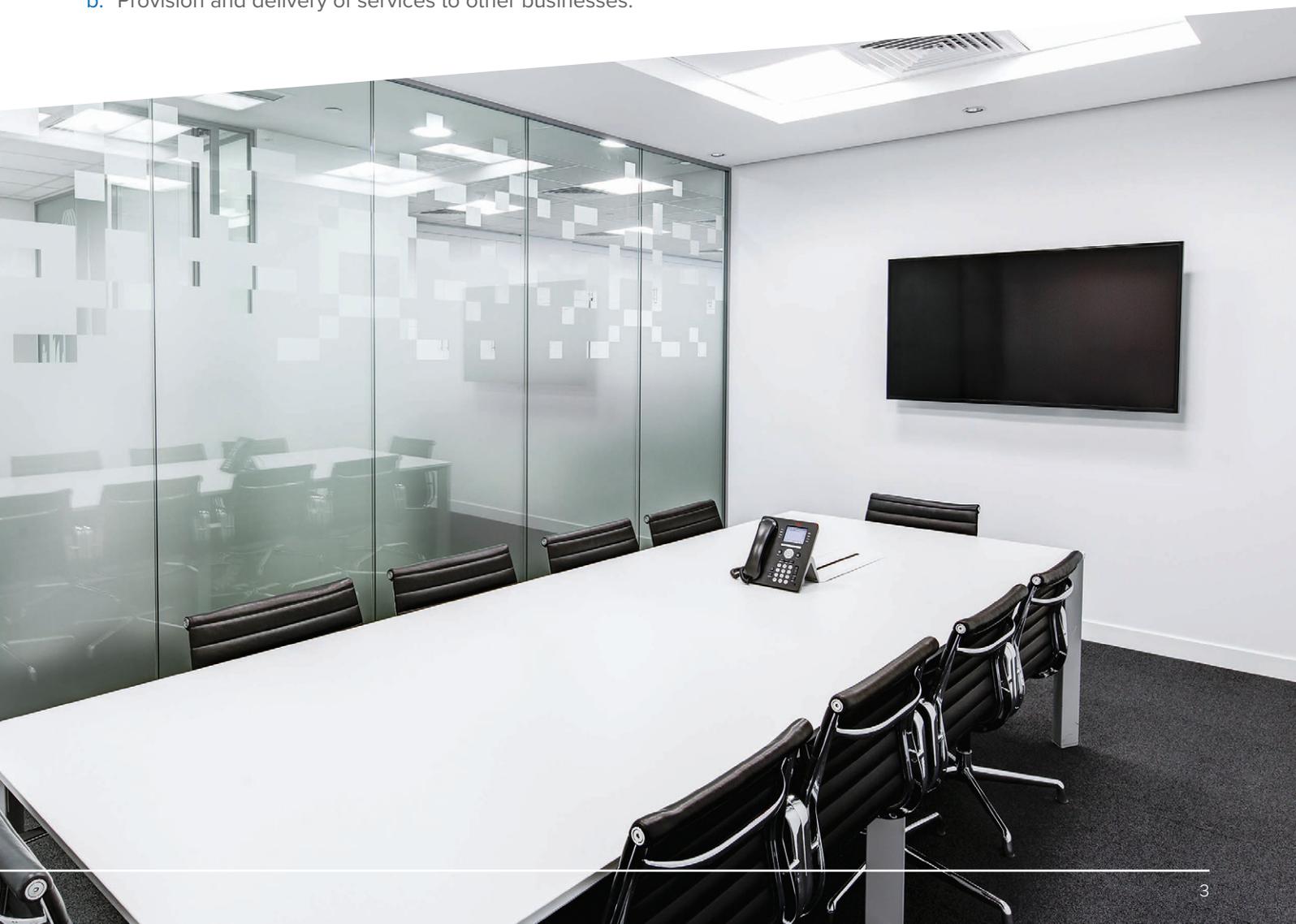
Outsourcing Oceania Holdings Pty Ltd acts solely as a holding company for Outsourcing Inc's Oceania (Australia, New Zealand & Singapore)-based operations; since January 2020 all of Outsourcing Inc's Oceania-based entities have been fully-owned and controlled by Outsourcing Oceania Holdings Pty Ltd.

This statement covers Outsourcing Oceania Holdings Pty Ltd and the controlled entities listed at Appendix A.

Collectively, the Outsourcing Oceania Group conducts business from approximately 32 locations across Australia, New Zealand and Singapore, has annual revenue in the region of \$790million and employs in excess of 500 staff.

In broad terms, the Outsourcing Oceania Group is a provider of recruitment, labour hire services and consulting services to other businesses (with over 5,000 on-hire workers at any time). This primarily involves the following types of operations (as described by the Act):

- a. Direct employment of workers; whether as permanent employees or on a casual or contract basis; and,
- b. Provision and delivery of services to other businesses.



For the purposes of this statement, our key operating elements of the Outsourcing Oceania Group, their operations and their associated supply chains are as follows:

ENTITY / GROUP	MAIN OPERATIONS	SUPPLY CHAIN
 <p>HOBAN Recruitment Pty Ltd</p>	<ul style="list-style-type: none"> Provides temporary and permanent recruitment services nationally; Specializes in recruitment for Federal and State government, accounting, finance & executive, call and contact centre, warehousing & logistics, blue collar and project management sectors. 	<ul style="list-style-type: none"> Office consumables; Utilities & occupancy services (eg office cleaning); Professional services (eg accounting & legal); Personal protective equipment (e.g. safety vests).
 <p>Clicks Recruit (Australia) Pty Ltd</p>	<ul style="list-style-type: none"> Provides permanent and contract ICT recruitment services nationally as well as payrolling, master vendor and testing & probity checking services. 	<ul style="list-style-type: none"> Office consumables; Utilities & occupancy services (eg office cleaning); Professional services (eg accounting & legal).
 <p>INDEX Consultants Pty Ltd</p>	<ul style="list-style-type: none"> Provides IT delivery for transformational technology solutions and specialists nationally; specializes in the government, utilities, consulting procurement and financial services sectors. 	<ul style="list-style-type: none"> Office consumables; Professional services (eg accounting & legal).
 <p>Outsourcing Oceania Pty Ltd</p>	<ul style="list-style-type: none"> Acts as a shared services provider for Hoban Recruitment, Clicks Recruit (Australia) and INDEX Consultants; These services include strategy & planning, commercial management, governance & risk management, accounting, payroll, credit management & receivables and ICT services. 	<ul style="list-style-type: none"> Office consumables; Technology (telecoms, hardware, software and cloud services); Professional services (eg accounting & legal)
 <p>Staff Solutions Australia Pty Ltd</p>	<ul style="list-style-type: none"> Provides comprehensive recruitment and education consulting services in Queensland, Victoria & NSW. 	<ul style="list-style-type: none"> Technology (hardware, software and cloud services); Professional services (eg accounting & legal).
 <p>Red Appointments Group</p>	<ul style="list-style-type: none"> Provides permanent and temporary trades and specialist recruitment in the manufacturing, mining and engineering sectors; operating in South Australia and the Northern Territory. 	<ul style="list-style-type: none"> Office consumables; Utilities & occupancy services (eg office cleaning); Technology (telecoms, hardware, software and cloud services); Professional services (eg accounting & legal); Personal protective equipment (e.g. safety vests).

ENTITY / GROUP	MAIN OPERATIONS	SUPPLY CHAIN
 <p>Marble Group</p>	<ul style="list-style-type: none"> Provides permanent and temporary trades and specialist recruitment in the construction, infrastructure & mining, design & architecture and real estate sectors; operating in Victoria, NSW, Queensland & Western Australia. 	<ul style="list-style-type: none"> Office consumables; Utilities & occupancy services (eg office cleaning); Technology (telecoms, hardware, software and cloud services); Professional services (eg accounting & legal); Personal protective equipment (e.g. safety vests).
 <p>Project Management Partners Pty Ltd</p>	<ul style="list-style-type: none"> Provides broad-based project management, consulting, training and advisory services to businesses in Australia and Singapore. 	<ul style="list-style-type: none"> Office consumables; Utilities & occupancy services (eg office cleaning); Technology (telecoms, hardware, software and cloud services); Professional services (eg accounting & legal).
 <p>Bluefin Resources Group</p>	<ul style="list-style-type: none"> Provides permanent and contract recruitment services nationally; specializing in the technology, sales, marketing, banking & finance, risk management, insurance, project management and strategy & innovation sectors. Also has a New Zealand based subsidiary (Kinetic Employment Limited) which provides permanent and contract recruitment services into New Zealand. 	<ul style="list-style-type: none"> Office consumables; Utilities & occupancy services (eg office cleaning); Technology (telecoms, hardware, software and cloud services); Professional services (eg accounting & legal).
 <p>Albacore Consulting Group</p>	<ul style="list-style-type: none"> Provides broad-based consulting and project-management services nationally. 	<ul style="list-style-type: none"> Office consumables; Professional services (eg accounting & legal).
 <p>Jigsaw Search Pty Ltd</p>	<ul style="list-style-type: none"> Provides permanent and temporary recruitment in the procurement and supply chain sectors nationally. 	<ul style="list-style-type: none"> Office consumables; Utilities & occupancy services (eg office cleaning); Technology (telecoms, hardware, software and cloud services); Professional services (eg accounting & legal).
 <p>Horizon One Recruitment Pty Ltd</p>	<ul style="list-style-type: none"> Provides permanent and temporary recruitment in government, HR, finance and technology sectors 	<ul style="list-style-type: none"> Office consumables; Professional services (eg accounting & legal).

SECTION 3: OUR APPROACH TO MANAGING MODERN SLAVERY RISKS

Consistent with Outsourcing Inc's Group Code of Corporate Ethics and Conduct, the Outsourcing Oceania Group has zero tolerance for any form of slavery-like practices.

Accordingly, the board of Outsourcing Oceania Holdings Pty Ltd has directed the development and adoption of the Modern Slavery Policy and the Modern Slavery Reporting Framework for the Outsourcing Oceania Group.

Compliance with the policy and the reporting framework is overseen by the board of Outsourcing Oceania Holdings Pty Ltd.

SECTION 4: OUR POLICIES & PROCESSES

At the start of 2020, formal policies we already in place that were intended to promote ethical and legally compliant business conduct. Those policies which contribute to our commitment to prevent violations of human rights such as modern forms of slavery in our business include our Group Code of Corporate Ethics and Conduct, our Group Anti-Corruption Policy and our Group Whistleblower Policy.

In addition to this, our Modern Slavery Policy and the Modern Slavery Reporting Framework have been specifically developed in order to address the specific risk of Modern Slavery within our business operations and supply chain; these were adopted by the Group during 2020.

In particular, the Modern Slavery Reporting Framework contains the following critical elements:

- A stated expectation that each Group entity and their suppliers will abide by the standards expressed in the Modern Slavery Policy;
- A commitment by the Group that its controlled entities will engage with suppliers throughout their supply chain to support anti-slavery practices;
- The requirement for each controlled entity to:
 - Appoint a nominated person to implement and manage the Modern Slavery Reporting Framework
 - undertake a risk assessment of its supply chain; this involves the identification of suppliers that represent a potential modern slavery risk (by the nature and likely source of their supplies and inputs) and obtaining (by way of a due diligence process) evidence that the supplier complies with both the Act (where applicable) and the standards expressed in our Modern Slavery Policy; and,
 - Maintain a record of such suppliers and details of their compliance with the standards expressed in our Modern Slavery Policy.

All of the above procedural controls will be reviewed on an ongoing basis to ensure that we have robust processes in place to minimise the risk of modern slavery in our operations and supply chain, as well as complying with the act.



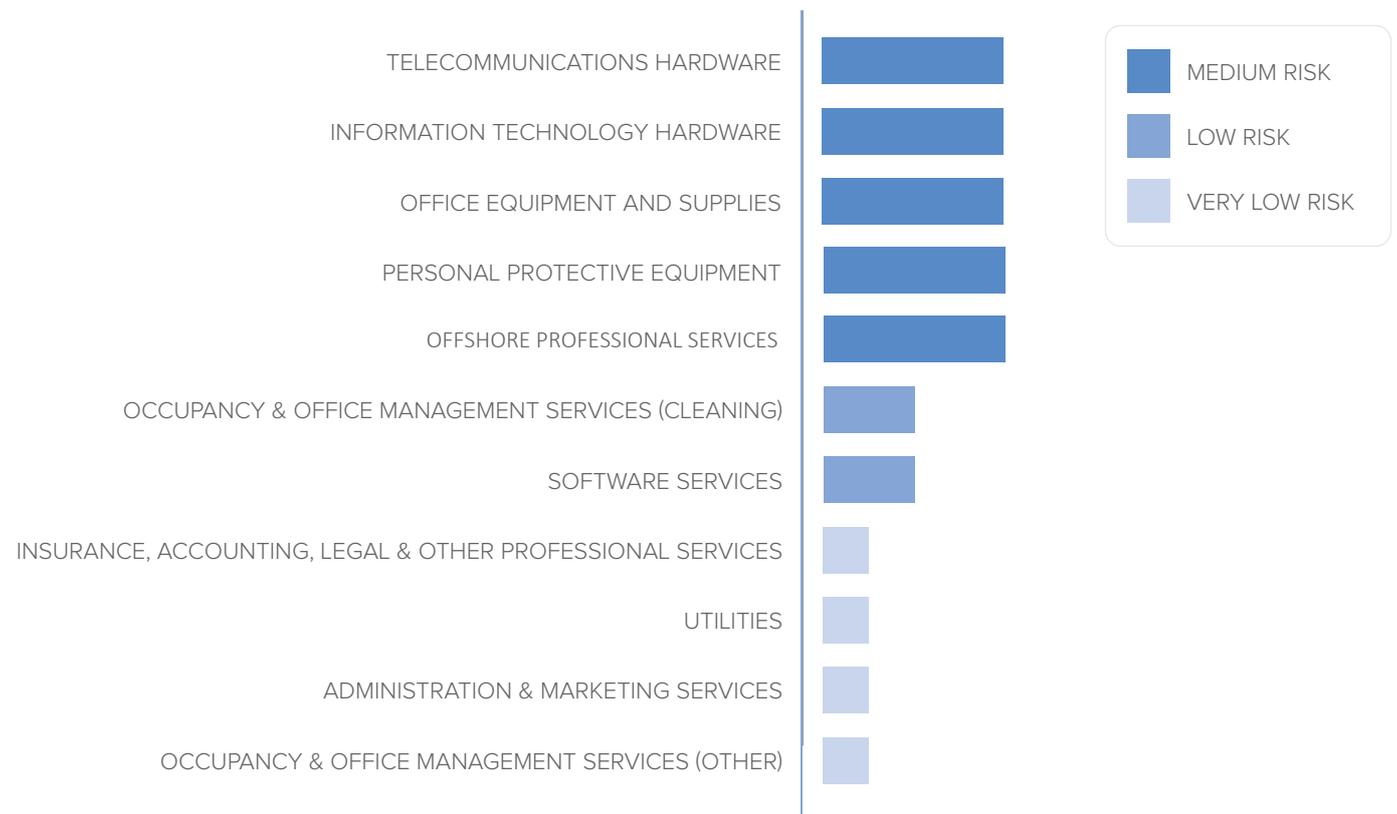
SECTION 5: POTENTIAL RISKS IDENTIFIED IN OUR SUPPLY CHAIN

As part of the implementation of our Modern Slavery Reporting Framework in 2020, the Group entities undertook a risk review of their supply chain. As a result, we have been able to identify areas with no or low risk. We also identified potential risks eg where a local supplier may source a product, such as IT or communications products which originate from overseas sources, which may have a risk of having modern slavery practices still in place.

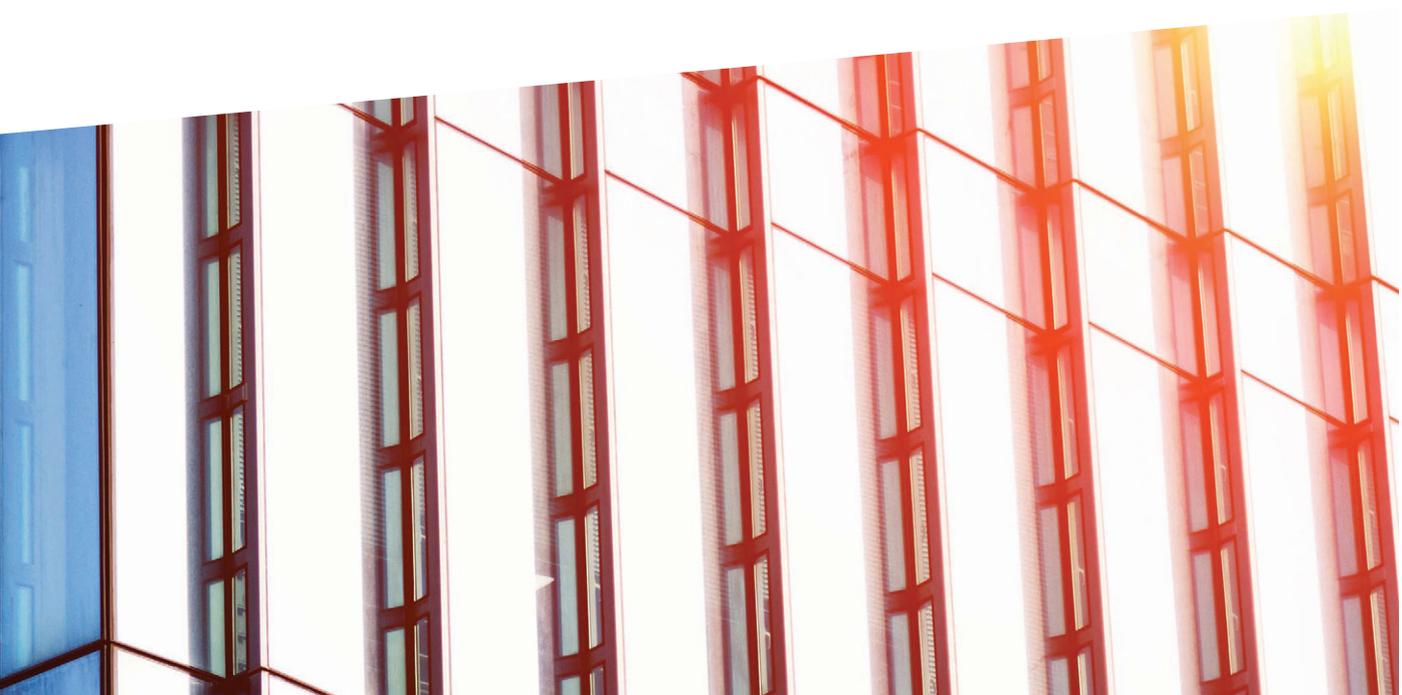
From the data collected during 2021, we have seen no changes in the risk profile.

The Group considers this outcome to be consistent with expectations given the nature of our business and the fact that our Group's supply chain utilises a relatively narrow range of business inputs (the broad majority of which are considered low risk from a modern slavery perspective).

INHERENT RISK OF PROCURED PRODUCTS & SERVICES



We will use these potential risk scenarios to inform our supplier engagement activities over coming financial years.



SECTION 6: ACTIONS TAKEN TO ADDRESS POTENTIAL RISKS & EFFECTIVENESS OF THESE ACTIONS

The actions taken to address potential risks are outlined in our Modern Slavery Reporting Framework. These include:

- Once a potential risk is identified (by the nature and likely source of their supplies and inputs) the entity will undertake a due diligence process in respect of that supplier. This will involve obtaining evidence (via questionnaire and/or via reference to the supplier's own internal process framework) that the supplier complies with both the Act (where applicable) and the standards expressed in our Modern Slavery Policy;
- Detail of such suppliers and their compliance with the standards expressed in our Modern Slavery Policy will be maintained on a register;
- If the supplier is not compliant with the Act (where applicable) and the standards expressed in our Modern Slavery Policy, our preference is to work with the supplier to manage the identified risk:
 - If an existing supplier has indicated that they are not currently compliant but can become so, they will be given a period of time to demonstrate compliance;
 - If an existing or prospective supplier is not compliant but can put in place an objectively-assessable risk mitigation program, this may satisfy our requirements for compliance;
 - Prospective suppliers who do not fully co-operate with the due diligence process would not be considered suitable for use;
 - We may choose to cease further engagement with non-compliant existing suppliers. However, in certain cases, the entity's CEO (or equivalent) may decide that it is in the entity's best interests to keep engaging with the non-compliant supplier. Where this is the case, the following details must be recorded:
 - a. The CEO's approval of this course of action;
 - b. The reason for the decision; and;
 - c. What is being done by the entity to manage the modern slavery risk exposure this presents.

As the Modern Slavery Reporting Framework was newly-adopted in 2020, measures to ascertain the effectiveness of actions to address the risks were still under development at the end of 2020. These were a key focus area in 2021 (see Section 7).

A relatively low level of potential risks in our Group's supply chain. Risk levels continue to decline due to the application due to the application of the due diligence process in selecting prospective suppliers.



SECTION 7: FUTURE ACTIVITIES

Over the 2021 year, our key focus areas included:

- a. Continuing to refine our Modern Slavery Reporting Framework to ensure that it continues to provide a suitable mechanism for identifying and managing modern slavery risks at a Group entity level;
- b. A continuing development of understanding of the effectiveness of the measures we have in place to address identified modern slavery risks; and,
- c. Continuing to engage with existing suppliers who we have identified as having potential modern slavery risks to ensure that those risks are adequately mitigated and/or managed in accordance with our Modern Slavery Policy.

In the 2022 year, we will:

- a. continue to update our Modern Slavery Reporting Framework so that it continues to provide a suitable mechanism for identifying and managing modern slavery risks whilst continuing to be relevant in the context of an evolving global environment;
- b. continue to understand the effectiveness of the measures we have put in place;
- c. find alternative suppliers for any who have been identified as having actual modern slavery risks.

SECTION 8: ISSUING AUTHORITY

This Modern Slavery Statement has been approved by the Outsourcing Oceania Holdings Pty Ltd Board of Directors (being the principal governing body of Outsourcing Oceania Holdings Pty Ltd ABN 20 628 356 141 and its controlled entities). This approval took place by resolution of the directors on 16th May, 2022.

This Modern Slavery Statement is accordingly issued under the authority of Outsourcing Oceania Holdings Pty Ltd Board of Directors via the signature of the nominated director, Benjamin Maitland Wood.



Ben Wood

Chairman & Director – Outsourcing Oceania Holdings Pty Ltd.



LIST OF ENTITIES COVERED BY THIS STATEMENT

Outsourcing Oceania Holdings Pty Ltd (ABN 20 628 356 141) and its controlled entities:

Hoban Recruitment Pty Ltd (ABN 88 052 201 313)
RAP2 Pty Ltd (ABN 25 630 066 483)
INDEX Consultants Pty Ltd (ABN 33 123 720 043)
Outsourcing Oceania Pty Ltd (ABN 25 006 776 343)
Staff Solutions Australia Pty Ltd (ABN 31 052 868 621)
Red Appointments Group Holdings Pty Ltd (ABN 88 637 107 281)
Red Appointments Pty Ltd (ABN 35 138 057 511)
Red Appointments NT Pty Ltd (ABN 83 153 591 587)
Marble Group Holdings Pty Ltd (ABN 91 613 294 536)
Marble Group Pty Ltd (ABN 93 119 778 193)
Marble Group Services Pty Ltd (ABN 66 631 301 016)
Project Management Partners Pty Ltd (ABN 13 084 197 795)
Bluefin Resources Group Pty Limited (ABN 93 140 092 011)
Bluefin Resources Pty Limited (ABN 48 106 436 837)
Albacore Consulting Group Pty Ltd (ABN 67 644 577 471)
Jigsaw Search Pty Ltd (ABN 92 122 998 743)
Horizon One Recruitment Pty Ltd (ABN 98 129 885 838)

COMPLIANCE WITH THE MODERN SLAVERY ACT

This Statement was prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act (Cth) 2018. The table below identifies where each criterion is disclosed within the different sections of this Statement.

SERIAL	MODERN SLAVERY ACT CRITERIA	SECTION OF STATEMENT
1	Identify the reporting entity	Front cover & Appendix A.
2	Describe the reporting entity's structure, operations and supply chains	Section 2.
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or control	Section 5
4	Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Section 6
5	Describe how the reporting entity assesses the effectiveness of these actions	Section 6
6	Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Sections 3 & 4
7	Provide any other relevant information	Section 7



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