

# 2024

## Modern slavery statement



# Commitment to Ethical Conduct and Exceptional Customer Experiences



At Probe Group, our purpose is to consistently deliver meaningful experiences by empowering people, driving innovation and harnessing technology. This commitment extends to our steadfast dedication to ethical conduct and the eradication of modern slavery. Our core values of diversity, empowerment, accountability, innovation, customer obsession and empathy for all are deeply ingrained in our commitment to combating modern slavery. We firmly believe that every individual deserves to be treated with dignity, respect and fairness. This statement outlines our ongoing efforts to uphold these values and ensure that modern slavery has no place in our operations or supply chains.

This is our fourth joint Modern Slavery Statement which sets out the steps Probe Group have taken to address modern slavery risks in our business for the financial year ending 30 June 2024 in accordance with the Modern Slavery Act 2018 (Cth) and is prepared on behalf of Probe BPO 1 Pty Ltd and in consultation with 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, Innovior Pty Ltd ACN 619 169 881, 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 Group'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, Probe CX 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 digitally enabled customer service solutions. Using human-led technology, we help organisations transform their digital capabilities to remain relevant to their customers in an ever changing world. From workforce management and people and culture, to intelligent automation, outsourced services, end to end credit management and collections solutions; our focus is on creating environments for digitally-enabled CX to thrive.

Our tech-enabled, empowered and engaged workforce delivers global customer contact solutions servicing 21 countries, seamlessly and reliably. Over 40+ years, the combination of people and technology 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.



## MANAGED & OUTSOURCED SERVICES

-  Contact Centre Operations
-  Digital Operations
-  Staff Augmentation

## TECHNOLOGY & TRANSFORMATION SERVICES

-  CX & Operations Strategy
-  Technology Services
-  CRM & Automation
-  Data & AI

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 Ethical Supply and Anti-Slavery Committee and consistent due diligence processes throughout our group established by our in-house Legal and Compliance team. As the entities within 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 head office is based in Melbourne, Victoria. Probe Group has close to 19,000 employees and we deliver services in Australia, New Zealand, the Philippines, the United States and India.

At Probe Group, we have a culture that seeks to attract and retain reliable, respectful and ethical employees. Our people are central to achieving our goal of delivering digitally-enabled CX. Probe Group 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.

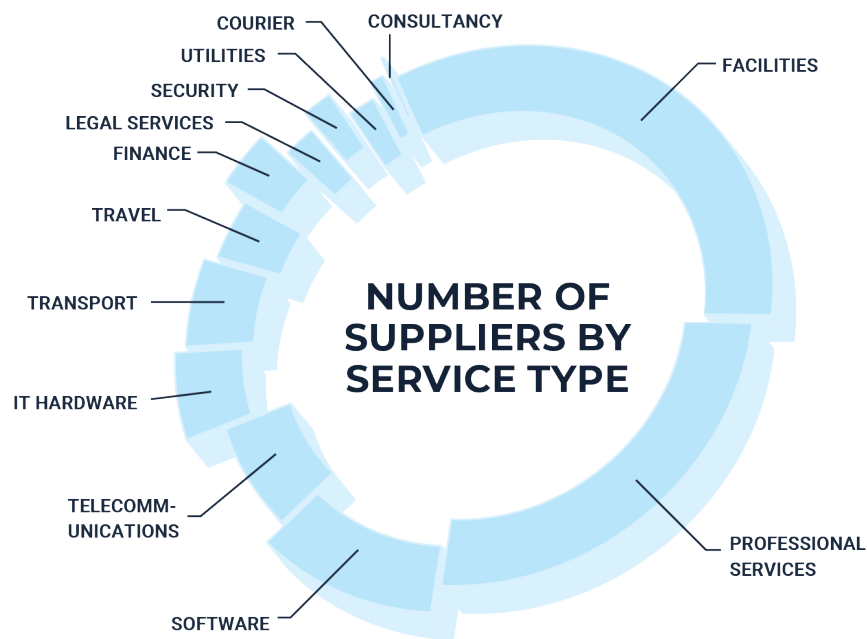
### Our business is organised into eight business units:

- |                     |                  |                 |            |
|---------------------|------------------|-----------------|------------|
| • Digital Solutions | • Field Services | • Convai        | • Beepo    |
| • Contact Solutions | • Collections    | • Microsourcing | • Innovior |

# Our Supply Chains

Probe Group’s supply chain is a vital component of our operations comprising approximately 750+ suppliers spanning various sectors. 75% of our suppliers are within facilities (including office supplies and services), professional services and IT. These figures reflect the importance of our suppliers to our overall business success. We recognise the significance of these relationships in achieving our organisational objectives and consequently, we require our suppliers to adhere to standards of ethical conduct and responsible business practices as outlined in our Supplier Code of Conduct.

Due to the nature of our operations, we have a relatively simple supply chain that 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 Values in Action



## Diverse and Empowered Workforce

We celebrate diversity and empower our employees to deliver exceptional customer experiences. Our commitment to ethical practices ensures that our workforce is free from exploitation and empowered to thrive.



## Accountability and Transparency

We hold ourselves accountable for maintaining the highest standards of ethical conduct. Our transparent business practices and robust reporting mechanisms ensure that we identify and address any potential risks of modern slavery.



## Innovation and Customer Obsession

We leverage innovation to drive exceptional customer experiences while remaining vigilant in our pursuit of ethical sourcing and supply chain management. Our dedication to customer satisfaction is matched by our dedication to social responsibility.



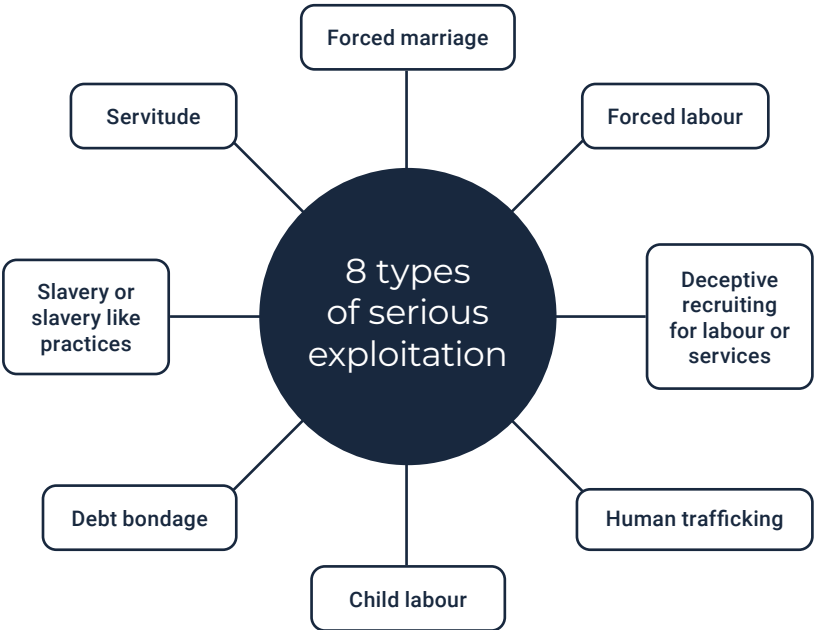
## Respect and Empathy for All

We prioritise the well-being of our employees and stakeholders, fostering a culture of empathy and support. Our commitment to respect and fair working conditions reflects our belief in the inherent dignity of every individual.

# Our ongoing Efforts to Combat Modern Slavery

The Modern Slavery Act 2018 (Aust) defines modern slavery to include eight types of serious exploitation:

- slavery or slavery like practices
- servitude
- forced labour
- forced marriage
- debt bondage
- deceptive recruiting for labour or services,
- human trafficking.
- The worst forms of child labour means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.



# Our Policies on Anti-Slavery

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

- Code of Ethics and Conduct
- Anti-Slavery Policy
- Recruitment Policy
- Corporate Social Responsibility Policy
- Procurement and Third Party Management Policy
- Whistleblower Policy

By adhering to these policies, we strive to contribute to the eradication of modern slavery and uphold the principles of fairness, integrity, and respect for human dignity.

Our Anti-slavery Policy also 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 which we have established to outline our expectations for ethical behaviour, including strict prohibitions on modern slavery practices. This code serves as a blueprint for setting clear guidelines for our suppliers to adhere to and reinforces our zero-tolerance approach towards any form of modern slavery.

## Due Diligence and Risk Assessment

We conduct a thorough due diligence on our suppliers and partners, assessing and mitigating the risk of modern slavery within our supply chains. Our risk assessment processes are designed to identify and address potential vulnerabilities.

## Training and Awareness

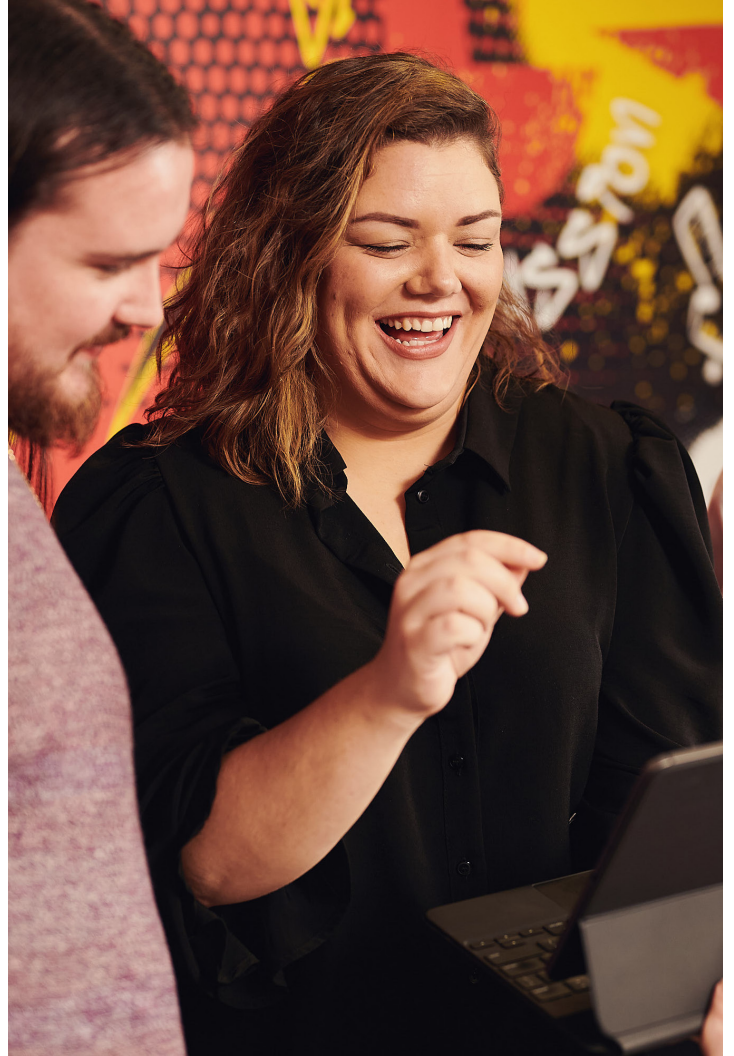
We provide regular training and awareness programs to our employees, empowering them to recognise and report any signs of modern slavery. We foster a culture of vigilance and ethical awareness.

## Collaboration and Engagement

We actively engage with our stakeholders, including suppliers, employees and partners to promote ethical practices and combat modern slavery collaboratively.

## Supplier Adherence

At Probe Group, we view our suppliers as integral partners in upholding shared principles of integrity and ethical conduct. Probe Group expects all suppliers whether directly or through their supply chain, to 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. 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.



To ensure our suppliers 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 Probe Group and applies to any third party providing products or services to or on behalf of Probe Group. Our Supplier Code of Conduct was reviewed this year to ensure it continues to remain relevant to the standards expected of Probe Group 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.

We believe that by cultivating a strong network of suppliers who share our values, we not only enhance the quality and reliability of our supply chain but also contribute to a global business community that prioritises ethical conduct and social responsibility.



# Modern slavery risks

Probe Group 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. Our risk assessment processes are designed to identify and evaluate potential areas of vulnerability within our supply chain. This includes thorough scrutiny of high-risk sectors, such as computer hardware manufacture and cleaning services.

We anticipate that due to our global operations, our purchase of goods and services may potentially be susceptible to risks of modern slavery and that specific sectors pose heightened risks for modern slavery, notably within the purchase of computer hardware manufacturing and cleaning services. In computer hardware manufacture, the complexity of global supply chains can sometimes obscure the origins and conditions of labour. Through diligent monitoring and proactive engagement with stakeholders we seek to minimise the risk of modern slavery in these critical areas.

During this reporting period, we conducted various assessments across our operations and supply chains and we are pleased to report that no instances of modern slavery were identified.

Probe Group manages risks to our organisation by maintaining consistent risk mitigation processes to monitor for and avoid modern slavery in all environments in which we operate. This includes undertaking due diligence on existing and potential suppliers, conducting thorough risk assessments, ensuring we have a robust training framework in place, and collaborating with stakeholders to discuss statutory updates, current compliance focus/ initiatives and new modern slavery risks identified, if there are any.

Where practicable, we seek to insert express terms in our supplier contracts requiring adherence to anti-modern slavery measures.



# Due Diligence Processes for Ethical Supply and Anti-Slavery

Probe Group’s due diligence framework seeks to minimise the risk of modern slavery in our operations and supply chain. We have in place systems to:



Identify and map our supply chain



Assess and monitor potential risk areas in our supply chains



Mitigate the risk of slavery occurring in our supply chains



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 areas within our supply chain that may be susceptible to modern slavery practices. This includes thorough scrutiny of sectors with high-risk profiles or high-risk locations. Through this assessment we gain a good understanding of the potential vulnerabilities and implement targeted measures to mitigate risk. 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 within 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. To date, our focus in our supply chain mapping and risk assessment has been on direct suppliers.

Probe Group is committed to the highest standards of integrity and promoting a culture of honest and ethical behaviour, corporate compliance and good corporate governance. Probe Group’s Whistleblower Policy, which is published on our website, serves as a vital pillar in our modern slavery compliance framework. It provides a secure avenue for employees and stakeholders to report any suspicions or evidence of modern slavery within our operations or supply chain. This policy ensures confidentiality, protection against retaliation and timely investigation of reported concerns. By empowering individuals to come forward, we strengthen our ability to identify and address potential risks, promptly reinforcing our commitment to transparency, accountability and the eradication of modern slavery in all its forms. This proactive approach illustrates our dedication to a culture of integrity and ethical conduct at every level of our organisation. Protected disclosures can be made through internal reporting processes or via the Probe Group stopline service.

# Training

Training is a crucial cornerstone of Probe Group's anti-slavery framework. It empowers our employees with the knowledge and tools necessary to recognise, prevent and report instances of modern slavery. Through targeted education we raise awareness about the signs, risks and consequences of modern slavery, fostering a vigilant and informed workforce.

To promote employee awareness all employees who are involved in procuring goods and services are required to complete Probe Group's Modern Slavery compliance training module.

Probe Group'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 and Achievements

We are proud of the steps we have taken to combat modern slavery within our operations. Measures we have implemented and continuously improved in FY24 include:

- ✔ Reviewing our commitment to anti-slavery through our Anti-Slavery Policy aligning our commitments with our company values of respect and empathy for all.
- ✔ Reviewed our supplier due diligence framework to identify opportunities to invest in technology to enhance our existing supplier due diligence screening process.
- ✔ We have continued to regularly monitor our Supply Chain Register to assess modern slavery risks in our supply chain.
- ✔ Undertaken a risk assessment of modern slavery risks within our operations.
- ✔ Enhanced training and awareness including through Integrity and Compliance training.
- ✔ Identified opportunities to enhance communication with our suppliers to promote compliance with anti-slavery laws.
- ✔ Training and awareness continues to be an important pillar in our anti-slavery framework. Our employees involved in the procurement of goods and services are required to complete anti-slavery training to ensure that their decisions and actions align with Probe Group's commitment to respect human rights.
- ✔ Reviewed our standard supplier terms as part of our Procurement Policy to ensure our commitment to anti-slavery is clear for the suppliers with whom we do business.

In addition we continue to promote awareness of our commitment to anti-slavery consistent with our company values of respect and empathy for all.





## 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 the implementation of modern slavery initiatives and achievement of anti-slavery goals.

We continue to focus on training completion and evaluating the best options for measuring the effectiveness of our modern slavery initiatives and actions. The following key performance indicators were achieved:

- 100% of suppliers being assessed for modern slavery risk
- Monitoring and ensuring supplier completion of Probe Group supplier modern slavery questionnaires, if applicable
- Review and update of our Procurement and Third Party Management Policy including the introduction of supplier standard terms which expressly cover modern slavery
- Continuation of leadership participation in modern slavery initiatives, specifically Probe Group's Ethical Supply and Anti-Slavery Committee
- Review and update of our Supplier Code of Conduct to ensure the Code remains relevant and up to date whilst considering any trends in modern slavery issues and the risks posed to Probe Group.

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 meets on a regular basis. One of our core key performance indicators for FY24 remains to promote awareness with our suppliers of modern slavery risks.

# Effectiveness in Combatting Slavery

AREA	ITEM	MEASUREMENT OR EFFECTIVENESS
Awareness	Ensuring modern slavery awareness training is provided for all staff engaged in procuring goods or services to raise awareness and to implement Probe Group's anti-slavery policies effectively.	Number of relevant staff who have received training on modern slavery risks.
Policies	Ensuring applicable Probe Group policies confirm Probe Group expectations in regards to preventing modern slavery in Probe Group's operations and supply chains.	Policies are reviewed annually to identify any opportunities for improvement. Supplier access to Probe Group policies related to modern slavery.
Supply Chain Register and Due Diligence	Monitoring of supply chain with maintenance of Probe Group supplier register.	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	Understanding exposure both within Probe Group operations and externally in our supply chain.	Completion of annual risk assessment.
Commitment	Establishing the Anti-Slavery and Ethical Supply Committee	Anti-Slavery and Ethical Supply Chain Committee to monitor progress against our action plan, collaborate and discuss current trends or issues and also a platform to discuss future plans and initiatives.
Internal Reporting	Reporting of our progress to our group's leadership team.	Updates to be provided to our group's leadership team.

Probe Group is dedicated to regularly evaluating the success of its anti-slavery initiatives. This evaluation is done through Probe's Anti-Slavery and Ethical Supply Committee.



# Probe Group Goals for FY 25



Implement a new third party supplier due diligence tool to enhance the effectiveness of supplier screening enabling automatic supply chain mapping, risk assessment and data analysis to enhance visibility of potential modern slavery risks.



Empower suppliers through knowledge sharing and expanding knowledge of potential modern slavery risks.



Enhance our Supplier Code of Conduct to fortify our commitment to eradicating modern slavery by incorporating more stringent requirements and expectations for our suppliers.



Mitigate the risk of modern slavery by actively promoting our Whistleblower Policy, encouraging reporting of any potential concerns or violations.

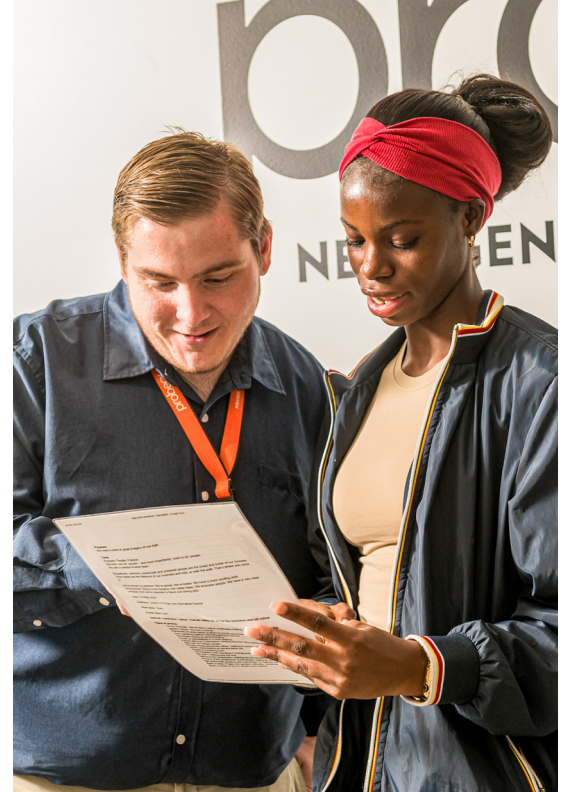


Continue to undertake human rights risk assessments to proactively identify and address potential areas of concern within our operations and supply chain.



## Consultation

The development of this Modern Slavery Statement involved active consultation with various entities within the Probe Group. This consultation process was facilitated through the Anti-Slavery and Ethical Supply Committee, ensuring that the perspectives and insights of different group entities were considered in the assessment and management of modern slavery risks.



## Our Commitment to Continuous Improvement

We are committed to continuously improving our efforts to combat modern slavery. We regularly review policies, procedures and performance to ensure that we are effectively addressing this critical issue. We believe that by upholding our values and working collaboratively with our stakeholders, we can create a business environment that is free from exploitation and promotes the wellbeing of individuals.

Together, we can make a difference.

*M. Sharma*

**Maneesh K. Sharma**

Group CEO

12 December 2024

# MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

## Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of

Probe BPO / Pty Ltd

as defined by the Modern Slavery Act 2018 (Cth)<sup>1</sup> ("the Act") on 12 December 2024

## Signature of Responsible Member

This modern slavery statement is signed by a responsible member of

the Board of directors of Probe BPO / Pty Ltd

as defined by the Act<sup>2</sup>:

Maneesh Sharma

Director

## Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	2
b) Describe the reporting entity's structure, operations and supply chains.	3 & 4
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	8
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	9, 10 & 11
e) Describe how the reporting entity assesses the effectiveness of these actions.	12,13
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	15
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	5, 6, 7, 15

\* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

\*\* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

- Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph – a prescribed body within the entity, or a prescribed member or members of the entity.
- Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee – that trustee; or (c) if the entity is a corporation sole – the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001 – the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph – a prescribed member of the entity.