



2020

MODERN SLAVERY  
STATEMENT

[igniteco.com](https://igniteco.com)



**IGNITE LIMITED**

ABN 43 002 724 334

## **2020 MODERN SLAVERY STATEMENT**

# MODERN SLAVERY STATEMENT

## Introduction

Ignite Limited (ABN 43 002 724 334) (“Ignite”), is an Australian listed company (ASX: IGN) with its registered office at Level 2, 55 Wentworth Avenue, Kingston, ACT, 2604. It is a reporting entity under section 5 of the Modern Slavery Act 2018 (Cth) (the “Act”), which requires reporting entities to produce an annual modern slavery statement.

This Modern Slavery Statement (the “Statement”) is made in accordance with section 13 of the Act on behalf of Ignite and its controlled entities (the “Ignite Group”) for the financial year ending 30 June 2020, being Ignite’s first reporting period under the Act.

As an Australian listed company, the Ignite Group is committed to the highest standards of corporate governance and endeavours to conduct and operate its business in a manner consistent with the laws and regulations of the jurisdictions in which it operates.

The purpose of the Statement is to comply with the Act and report on the steps taken by the Ignite Group during the reporting period to identify, assess, monitor and mitigate the risk of modern slavery practices in its operations and supply chain, and evaluate the effectiveness of its response.

## Structure, operations and supply chain

The structure, operations and supply chain of the Ignite Group during the reporting period are described below.

### Structure

The Ignite Group, headquartered in Sydney, Australia, comprises the listed Australian parent entity Ignite Limited, New Zealand subsidiaries Ignite New Zealand Holdings Limited and Ignite IT Services Limited, and a dormant Hong Kong subsidiary Lloyd Morgan Limited.

All these entities operate as one entity in the same industry sector, provide similar services and share directors, management, vendors and corporate functions including procurement, finance, legal, human resources and information technology as well as policies and procedures.

### Operations

The operations of the Ignite Group service clients across the geographic regions of Australia and New Zealand and are split into three service lines: Specialist Recruitment comprising the provision of contingent labour and permanent recruitment services; On Demand IT Services involving the delivery of specified information technology skills; and People Services involving the development and delivery of outsourced recruitment and human resource consulting services.

The Ignite Group operates from offices in 4 cities across Australia being Canberra, Melbourne, Perth and Sydney, and employs approximately 80 permanent staff. In the financial year ending 30 June 2020 the Ignite Group’s consolidated revenues were \$125,958,000.

## Structure, operations and supply chain (continued)

### Supply Chain

The supply chain of the Ignite Group consists of goods and services that support the provision of Specialist Recruitment, On Demand IT Services and People Services to clients across Australia and New Zealand. The supply chain can be broadly split into two categories of expenditure.

#### *Contingent labour*

The Ignite Group's primary supply chain, based on transaction volume and expenditure, involves the identification, sourcing, engagement and remuneration of white collar professional, skilled and semi-skilled casual staff and independent contractors that are on-hired to clients, including Federal and State Government departments and commercial organisations. The majority of transactions and expenditure are in Australia.

#### *Other suppliers*

Secondary supply chain expenditure is predominantly related to: the provision of facilities infrastructure for Ignite Group staff including property leases, cleaning, utilities, office equipment, office consumables; and other services that support the delivery of client services including banking and financial services, information technology hardware and software, telecommunications, insurance, travel and accommodation, advertising, marketing and professional services.

## The risk of modern slavery practices

Modern slavery is defined in the Act as including eight forms of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour where children are subjected to slavery or similar practices or engaged in hazardous work.

The spectrum of work ranges from modern slavery at one extreme involving serious criminal exploitation to decent work at the other involving respect for worker rights, freedom for workers to refuse or cease work, paying workers fairly and providing safe workplaces.

As an Australian listed company, the Ignite Group has a zero tolerance towards modern slavery practices and is committed to identifying and eradicating modern slavery practices from its operations and supply chain. The Ignite Group recognises, and acknowledges, its responsibilities under the Act and will ensure transparency with its clients, staff and suppliers of goods and services.

In order to understand the risk of modern slavery practices it is necessary to examine the Ignite Group operations and supply chain.

### Operations

The Ignite Group has a suite of human resource policies and procedures to ensure its approximately 80 permanent staff, all of whom are based in Australia, are properly engaged and remunerated, and provided workplaces and working conditions that are in accordance with Australian employment laws, and as such are safe from modern slavery practices. Terms and conditions of employment are, at a minimum, in accordance with statutory regulations including the Fair Work Act 2009 (Cth) (the "FW Act") and regulations in relation to anti-discrimination, diversity and workplace health and safety.

## The risk of modern slavery practices (continued)

### Supply Chain

#### *Contingent labour*

As noted previously, the Ignite Group's primary supply chain comprises white collar professional, skilled and semi-skilled casual staff and independent contractors engaged and remunerated to provide labour services to clients in Australia and New Zealand. During the reporting period the Ignite Group transacted with over 2,000 casual staff and independent contractors. The Ignite Group has a suite of policies and procedures to ensure casual staff and independent contractors, all of whom are based in Australia or New Zealand, are properly engaged and remunerated and provided workplaces and working conditions that are in accordance with Australian and New Zealand laws, and as such are safe from modern slavery practices. Individual terms and conditions of employment are, at a minimum, in accordance with statutory regulations that govern employment in each jurisdiction including the FW Act in Australia and regulations in relation to anti-discrimination, diversity and workplace health and safety.

#### *Other suppliers*

The Ignite Group has approximately 200 secondary suppliers that are predominantly based in Australia, a country with a relatively low risk of modern slavery practices. The Ignite Group, however, recognises and acknowledges that some of these suppliers source goods and services from overseas, including jurisdictions that present a higher risk of modern slavery practices according to the Global Modern Slavery Index<sup>1</sup>.

## Actions taken to assess and address the risk of modern slavery practices

### Corporate Governance and Risk Management Framework

As a listed company the Ignite Group is committed to the highest standards of corporate governance. The Ignite Board of Directors (the "Board") and the Board Audit, Risk and Compliance Committee (the "Committee") are responsible for ensuring that the Ignite Group has an appropriate corporate governance and risk management framework. Forming part of and underpinning that risk management framework are a number of policies, procedures and internal controls that assist, amongst other things, in assessing and addressing the risk of modern slavery practices. The following key indicators were used to identify and assess the risk of modern slavery practices within the operations and supply chain of the Ignite Group during the reporting period: goods and services risk; industry sector risk; vendor/entity risk; and geographic risk.

### Assessment

#### *Labour onboarding*

The Ignite Group has a robust onboarding process for permanent and casual staff and independent contractors including identity verification, right to work checks (for Australia or New Zealand, as applicable) and written employment agreements. The Ignite Group has centralised compliance, payroll, human resources and legal teams who provide subject matter expertise regarding the applicability of modern awards and minimum wages, allowances and overtime pay as applicable as well as employee entitlements under the FW Act. As such the risk of modern slavery practices in the onboarding of permanent and casual staff and independent contractors is low to negligible.

---

<sup>1</sup> Global Modern Slavery Index 2018 <https://www.globalslaveryindex.org/2018/findings/highlights>

## Actions taken to assess and address the risk of modern slavery practices (continued)

### Assessment (continued)

#### *High risk industry sectors*

The Australian Federal Government established the Migrant Workers' Taskforce in 2019 in response to revelations of significant wage underpayments in certain industry sectors. The report handed down in March 2019 identified four high risk industry sectors involving labour hire being horticulture, meat processing, cleaning and security. Additionally, the South Australian and Victorian State Governments have identified poultry processing, trolley collection and seafood processing as high risk industry sectors. The Ignite Group does not have clients operating in these high risk industry sectors for which it has to engage casual staff and independent contractors. However, the Ignite Group does procure cleaning services, either directly or indirectly from its secondary suppliers, for the maintenance and cleaning of its office facilities.

#### *Supplier due diligence*

The Ignite Group's secondary supplier due diligence process involves a mixture of interviews and discussions with existing and new suppliers to identify and where possible address the risk of modern slavery practices. Secondary suppliers are subject to review and assessment prior to appointment, and on an ongoing basis, by senior management. The Ignite Group is working to develop policies and procedures that will over time enable it to work co-operatively with its supply chain to effect change where there is a risk of modern slavery practices. However, the ability to effect change is a significant challenge the further removed the Ignite Group is from the direct supplier relationship.

#### *Supplier rationalisation*

During the 2020 financial year the Ignite Group actively rationalised and consolidated the number of secondary suppliers with whom it traded by 25% to approximately 200, in order to better manage expenditure and vendor risk, including the risk of modern slavery practices.

#### *Geographic risk*

In November 2019 the Ignite Group disposed of its China business operations. This transaction not only significantly reduced the Ignite Group's financial risk but also the operational risk from a geographic market where, according to the Global Modern Slavery Index<sup>2</sup>, there is a high prevalence of modern slavery practices.

### Remediation

The Ignite Group has a number of mechanisms that allow its permanent and casual staff, independent contractors, suppliers, clients and regulatory agencies to raise and report concerns around suspected or actual improper conduct including modern slavery practices.

#### *Policies and procedures*

The Ignite Group has a number of policies and procedures including its Code of Conduct, Anti-Bribery and Corruption Policy, Bullying and Harassment Policy, Equal Opportunity Anti-Discrimination Policy, Workplace Health and Safety Policy and Whistleblower Policy. All staff are required to acknowledge and comply with these policies and breaches may be regarded as misconduct resulting in disciplinary action including termination of employment.

---

<sup>2</sup> Global Modern Slavery Index 2018 <https://www.globalslaveryindex.org/2018/findings/highlights>

## Actions taken to assess and address the risk of modern slavery practices (continued)

### Remediation (continued)

#### *Client audit and certification*

Many Ignite Group clients, including Federal and State Government departments and commercial organisations, include audit provisions and periodic certification obligations in their contracts for the provision of contingent labour. Consequently, the Ignite Group is required to provide these clients with information around its compliance with employment laws and regulations relating to the engagement and remuneration of casual staff and independent contractors.

#### *Labour hire and recruitment services licencing*

Several State Governments have imposed labour hire and recruitment services licencing schemes. The objective of the schemes is to broadly protect workers from exploitation by labour hire companies and their clients, to improve transparency and integrity within the labour hire industry and to promote responsible practices in the labour hire industry. Licencees are required to meet strict fit and proper person tests and compliance obligations including regular reporting requirements. The Ignite Group is a licencee under the labour hire and recruitment services licencing schemes in the Australian Capital Territory, Queensland, Victoria and Western Australia, which are currently the only schemes in operation.

## Effectiveness of actions taken to address the risk of modern slavery practices

In accordance with the requirements of the Act, the Ignite Group is committed to undertaking continuous and ongoing assessment of its operations and supply chain to identify and address the risk of modern slavery practices.

#### *Governance*

The Committee met quarterly during the reporting period to review, amongst other things, the Ignite Group's risk management framework and activities. The Committee's terms of reference include a responsibility to assist the Board in recognising and managing risk, including the risk of modern slavery practices, and ensuring the Ignite Group's compliance with all laws and regulations.

#### *Grievance and mediation*

During the reporting period no concerns were raised, reported or brought to the attention of the Ignite Group regarding unlawful, unethical or socially irresponsible conduct, including modern slavery practices in the Ignite Group operations or supply chain. Furthermore, the Ignite Group were not made aware of any actual, or alleged, modern slavery practices by any of its suppliers.

#### *Labour hire and recruitment services licencing*

During the reporting period the Ignite Group complied with its disclosure and reporting obligations and was not alerted to any shortcomings or failures in meeting its compliance obligations by the regulatory agencies administering the labour hire and recruitment services licencing schemes.

#### *Corporate functions*

The Ignite Group's centralised compliance, payroll, human resources and legal teams are continually monitoring and ensuring compliance with policies and procedures, onboarding procedures including work health and safety checks, pay rates, and statutory obligations.

## Effectiveness of actions taken to address the risk of modern slavery practices (continued)

### *Industry body*

The Ignite Group is a founding member of the peak industry body, the Association of Professional Staffing Companies (“APSCO”) and appoints an executive to its board. APSCO kept members updated and informed of regulatory changes including the Act and represented members to Federal and State Government and regulatory authorities on matters of significance to the labour hire and recruitment industry.

## Priorities for the next reporting period

The Ignite Group’s priorities for the next reporting period are to review and update its Code of Conduct, formalise its Modern Slavery Policy and develop and implement a Supplier Code of Conduct.

## Consultation and approval

The directors of each entity in the Ignite Group were provided this Statement for review and comment prior to it being finalised. This Statement was approved by the Board of Directors of Ignite Limited, the principal governing body of the reporting entity, on 30 March 2021.



Garry Sladden  
Chairman



THIS PAGE INTENTIONALLY LEFT BLANK

2020

MODERN SLAVERY  
STATEMENT

