

# **Globalization Partners Pty. Ltd.**

## **Modern Slavery Statement**

### **Financial Year End 30/06/2023**

This statement sets out Globalization Partners Pty. Ltd.'s ("G-P" or the "Company") actions to comprehensively assess all potential risks related to modern slavery within its business and to implement measures aimed at ensuring there is no slavery or human trafficking in its own operations and its supply chains.

As part of the global expansion industry, we acknowledge our responsibility to take a rigorous stance against slavery and human trafficking. We consistently and seriously uphold this responsibility.

G-P is committed to operate its business in compliance with the Modern Slavery Act of 2018 and ensure that its supply chains are free from slavery and human trafficking.

### **G-P Business model**

The following sets forth a description of G-P's services and business model:

- G-P Partners simplifies global business by enabling companies to hire and retain team members within Australia without the need to establish a branch office or subsidiary. Serving as an employer of record ("EOR"), we hire employees to work on behalf of our clients, employees have employment contracts and are fully supported by G-P as their employer. We manage employment contract best practices, statutory benefits, employee expenses, and the entire spectrum of matters pertaining to the life cycle of all employees.
- Leveraging our Software as a Service ("SaaS") platform and bolstered by the assistance of our team of human resources experts and legal professionals, we empower clients to streamline the processes related to hiring, onboarding, payroll management and benefits administration, all while ensuring efficiency and adherence to compliance standards.

### **Risk profile of countries of operation and supply chains**

G-P has evaluated the potential or perceived risks of modern slavery across our business and our supply chains and has determined the current risk level is low. This determination stems from the nature of our EOR business model, along with our unwavering commitment to:

- Providing support and guidance to individuals and clients within our business and supply chain.
- Regularly reviewing and updating our practices and policies to ensure compliance with applicable laws and regulations; and
- Taking proactive measures to identify and mitigate potential or perceived risks.

## **Our Policy**

G-P's policy is to conduct all our business activities in an honest and ethical manner, while fully complying with all applicable legislation. Our commitment is to ensure that modern slavery and human trafficking have no place within our supply chain or our business in any capacity. We aim for a zero-tolerance approach towards violations of anti-slavery and human trafficking laws.

We will use information and due diligence conducted on our suppliers to implement effective action plans in our ongoing efforts to mitigate and eliminate modern slavery risk proactively. If breaches of pertinent laws are found within our supply chain, we will look to support organizations in their efforts to comply with the applicable legislation, and, if appropriate, terminate the relationship. G-P will assess the continuation of business with individuals and organizations found to be involved in slavery, human trafficking, forced or child labor and reserve the right to terminate such relationships on this basis.

G-P is committed to acting professionally and with integrity in all its business dealings and relationships at all levels of operation. We will ensure appropriate transparency with our employees, clients, suppliers, and stakeholders regarding the maturity of our modern slavery due diligence process and the outcomes it generates.

## **Reporting knowledge or suspicion of slavery or human trafficking**

G-P employees and professionals have the obligation to promptly report any knowledge or suspicion of slavery or human trafficking. If an employee or professional has a genuine suspicion or knowledge of this issue, they should immediately report it to their manager, G-P's Ethics, Risk and Compliance Team or through the Company's confidential reporting hotline, EthicsPoint, which is operated by Navex, a third-party provider. This hotline allows employees to confidentially report concerns or suspicions of slavery or human trafficking, either through a telephone hotline or reporting website. Employees and professionals who raise such concerns in good faith can do so without the fear of discrimination or retaliation.

Such obligations do not replace any other legal reporting or disclosure requirements. Where statutory reporting requirements and procedures exist, they must be fully complied with.

## **Anti-slavery measures and initiatives include:**

- **Policies:** G-P Global Code of Conduct; Whistleblower Policy and other related policies.
- **Investigations/due diligence:** G-P has a confidential reporting hotline, EthicsPoint, which is operated by Navex, a third-party provider. This hotline allows employees and professionals to report confidential concerns either through a telephone hotline or a reporting website. The information provided is sent to G-P's Ethics, Risk and Compliance team by Navex on a confidential basis. Investigations are conducted in an independent and thorough manner, in addition, as described above, discrimination and retaliation are strictly prohibited.
- **Training:** G-P is in the process of developing a training module for its leaders, professionals, and employees to better understand and respond to the identified slavery and human trafficking risks. We are going to require all employees to have completed training on modern slavery and human trafficking within this reporting period.



- **Communication:** Ongoing communications will be provided to key staff to ensure awareness and clarity around modern slavery related considerations and responsibilities.

We aim to assist our employees in gaining a better understanding of these issues and equipping them with the knowledge to report any suspicions they may have regarding modern slavery and human trafficking. To measure our progress in this regard, we will closely monitor our formal whistleblowing reporting mechanisms and systems, to understand whether there has been an increase in the reported modern slavery and human trafficking incidents due to heightened awareness and enhanced training.

### **Relevant policies**

We implemented the following policies that outline our approach to identifying modern slavery risks and measures to prevent slavery and human trafficking in our operations:

- **Global Code of Conduct**  
Our Code of Conduct defines the expected actions and behaviors of our employees when they represent our organization. We are committed to upholding the highest standards of employee conduct and ethical behavior, whether operating in Australia or internationally or managing our supply chain.
- **Whistleblower Policy**  
Through our Whistleblower Policy, we actively encourage all employees and business partners to report any concerns related to G-P's business activities or supply chains, including situations that may pose an elevated risk of slavery or human trafficking. Our whistleblowing procedure is designed to facilitate easy disclosures by employees and professionals, without fear of discrimination or retaliation. Employees and professionals with concerns can use our confidential hotline or report the suspicions online through our whistleblower channels.

### **Looking forward**

We are currently in the process of developing an online training course to enhance our internal response to modern slavery and human trafficking risks. Once the training course is finalized, it will become a mandatory component of our employee training program. The course will cover the following topics:

- Assessing the risk of slavery and human trafficking across various aspects of the business and the resources and support available to employees.
- Identifying signs indicative of slavery and human trafficking.
- Outlining initial steps to take when suspicions of slavery or human trafficking arise.
- Describing the procedures for escalating potential slavery or human trafficking concerns to relevant parties within our organization.
- Detailing the actions our organization should take if suppliers or contractors fail to implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

G-P will also continue to develop and implement the aforementioned measures within our supply chain.

G-P takes full responsibility for this Modern Slavery Statement and its objectives, and it will undergo regular review and updates as necessary.

**Company approval**

This statement was approved by the Board of Directors (principal governing body) of Globalization Partners Pty. Ltd. on October 12, 2023. This statement will be updated annually.

**Mr. Todd Goffman**

*Director*

Signature:

A handwritten signature in black ink, appearing to be 'TG', written over a horizontal line.