



RC-ML-001
Modern Slavery
Statement

FY20-21

DISCLOSURE NOTICE

This statement includes CXC Australasia operating in Australia, New Zealand and Philippines.

CXC Australasia's entities includes Global Contractor Management Solutions Pty Ltd (GCMS – trading as CXC) and its sub-entities CXC Global NZ Limited, CXC Corporate Services Pty Ltd, Contractor Workforce Solutions Pty Ltd, and CXC Financial Partners.

This statement does not include CXC Global or its other entities such as CXC Asia, CXC Europe, CXC Latin America or CXC North America. CXC's partner offices not considered to be a contributing entity have also not been considered as part of this statement.

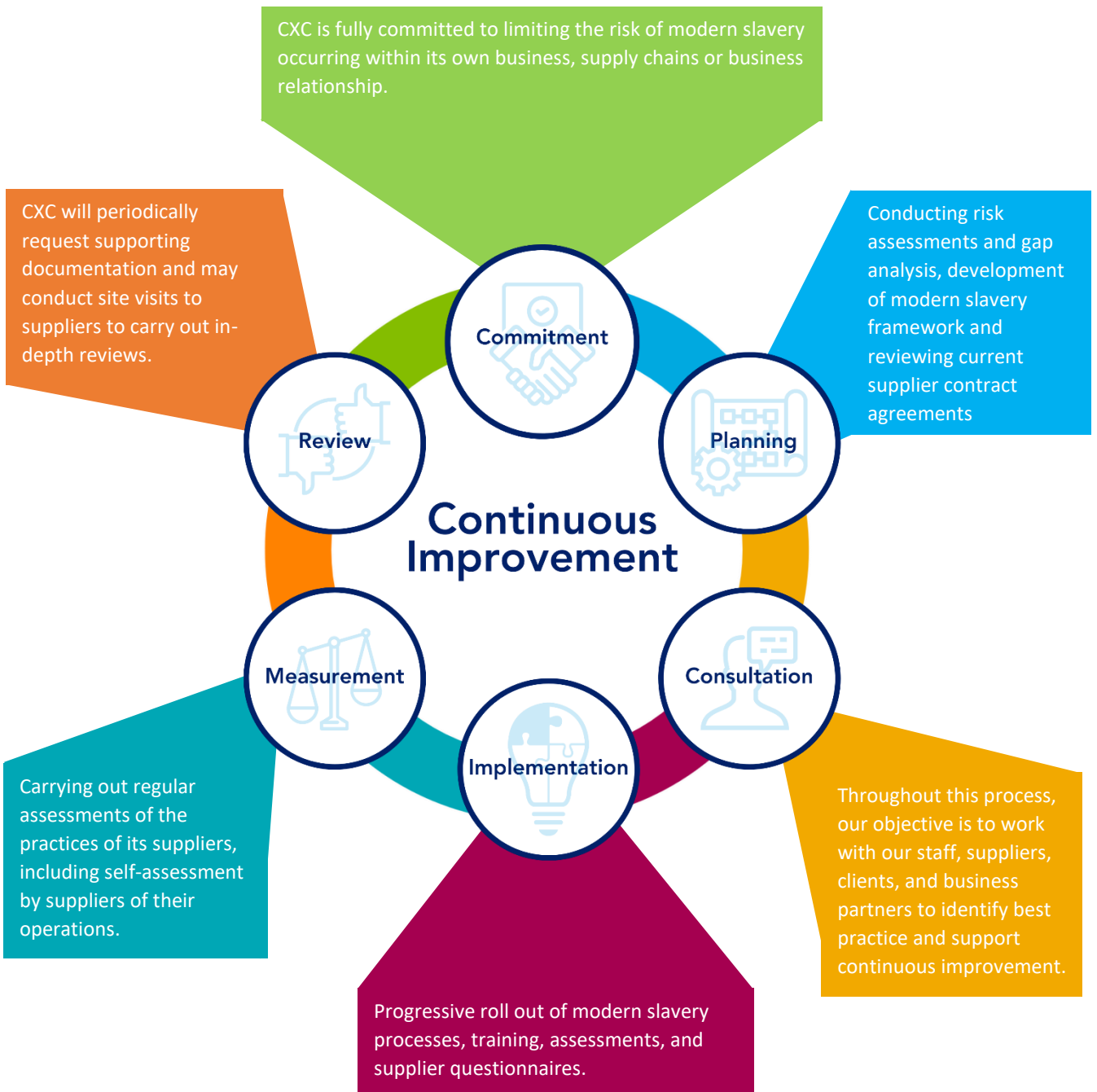
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FRAMEWORK

MODERN SLAVERY FRAMEWORK

Our approach to the incorporation of modern slavery into our BAU is based on the following 6 key elements.



ABOUT US



We have been operating in the contingent workforce management industry since 1992. Today, CXC continues to lead the way by enabling both corporations and individual consultants to adapt to today's high-performance work environment.

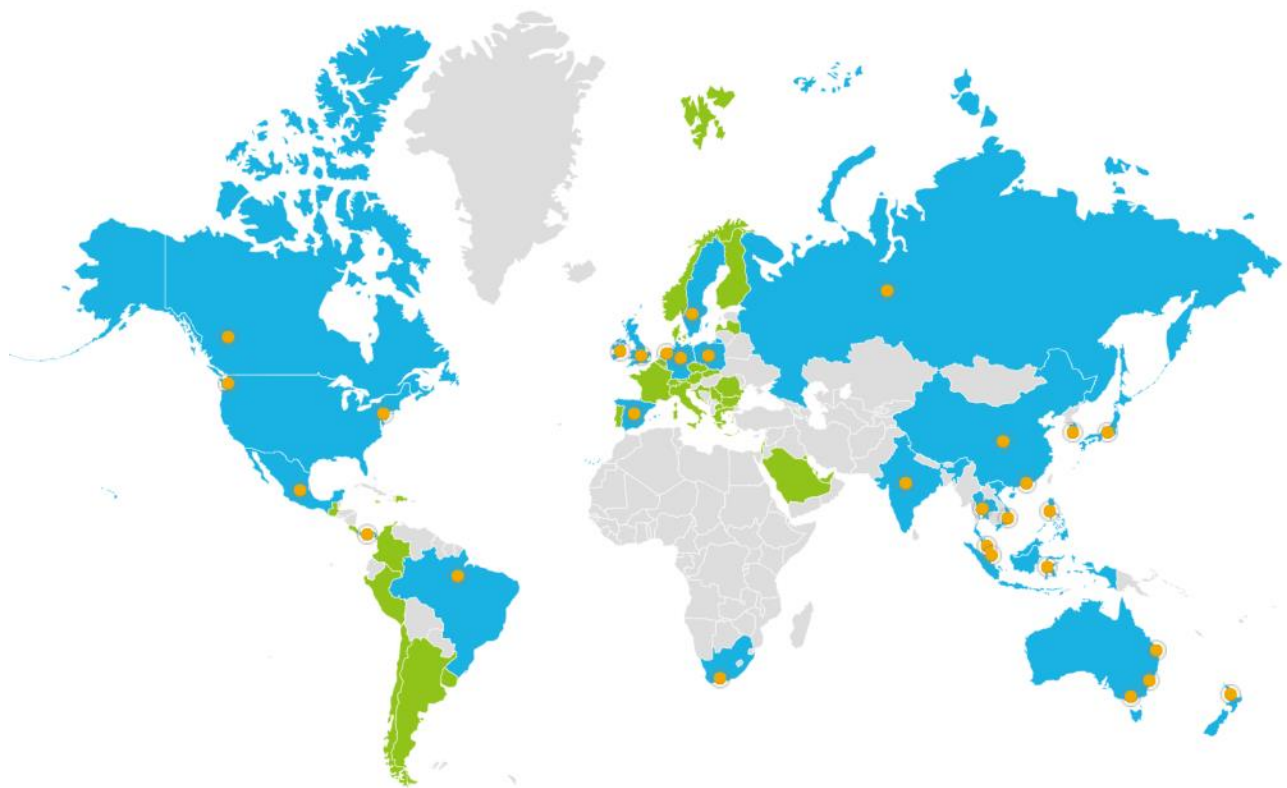


Global Footprint

We operate in more than 50 countries from more than 30 local offices spread right across the globe. Our approach is to provide local knowledge and expertise, coupled with an unparalleled global reach and scalability.

A GLOBAL ORGANISATION

Our geographic footprint spans 5 continents providing services from over 30 offices



Map Key



PURPOSE

Achieving sustainable success in the evolving world of work

CORE VALUES

Core Values are the attributes are important to the organization and its employees and are a guide for the behaviours we expect each other to display daily.



We are family

We care for each other and work better as a team. Our culture is built on respect, loyalty and fun.



We are accountable

We take responsibility for our work. By taking ownership, we deliver results.



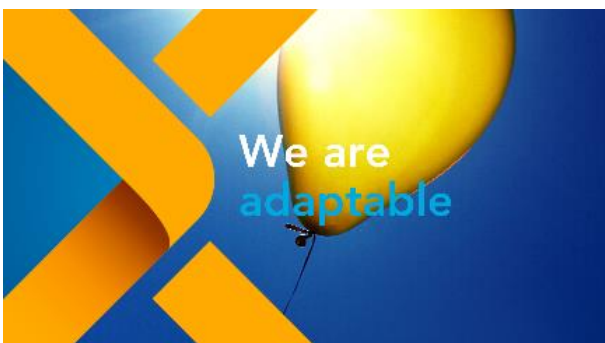
We are honest

We keep our promises and act with integrity. We do the right thing.



We are passionate

We are proud about what we do. We strive for professional excellence because we believe in ourselves and our team.



We are adaptable

We don't back down from change. By embracing it, we have an opportunity to learn and grow.



We are curious

We are solutions focused. We use our curiosity and love for learning to solve our customers' problems.



Company Structure



Established in Australia in 1992 to provide contractor vetting, compliance and payroll, the contingent workforce market has continued to be our core, with services now delivered in over 50 countries internationally by local specialists. Our corporate offering has evolved over the past decade due to increasing market complexity, regulation, technology, and evolving client demand.

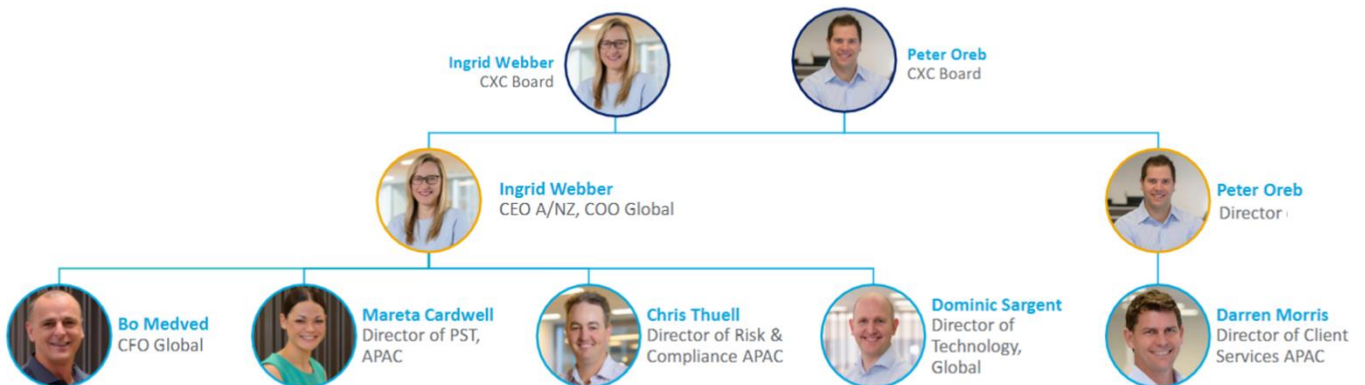
CXC is an extension of our clients’ HR and Procurement function, taking responsibility for their entire contingent workforce. CXC’s difference is that, while managing visibility, cost, and control, we also enable their talent first approach – including access to new and known talent and improving the engagement and performance of the workforce.

STRUCTURE

CXC Australasia is comprised of Global Contractor Management Solutions Pty Ltd (GCMS), trading as CXC, and its sub-entities CXC Global NZ Limited, CXC Corporate Services Pty Ltd, Contractor Workforce Solutions Pty Ltd, and CXC Financial Partners operating in Australia, New Zealand, and Philippines. CXC Australasia has on average 80 permanent staff and upwards of 3500 in our contingent workforce at any given time, with an approximate 8800 workers during the reporting period.

CXC Australasia is part of the CXC Global group.

PRINCIPLE GOVERNING BODY



Business Operations & Supply Chains

OPERATIONS

CXC pioneered and leads the way in whole of workforce contingent workforce management solutions where all workers are managed under one governed program irrespective of sourcing channel – direct or recruitment supplier. Our capability is based in contingent worker risk & compliance management and a targeted offering aimed at attracting and retaining highly sought-after career contractors.

Clients with strong internal capability benefit from a workforce management partner who understands the full contingent workforce acquisition and management life cycle. Clients can choose to outsource their full contingent program or components of the program where particular external support and expertise is needed – for example, in complex workforce risk & compliance management.

CXC are truly vendor neutral; we are not affiliated with a staffing services firm and our focus is on improving an organisation's internal capability, optimising talent recruitment channels and ensuring optimum workforce compliance and cost efficiency.

CXC offers a full suite of contractor management outsourcing services. At the core of CXC's solution is contingent workforce management – an essential service for companies to maximise risk mitigation, quality, efficiency, and cost savings across their contingent workforce. We invest heavily in people, processes, and technology to ensure contractors are engaged, onboarded, payrolled and disengaged in full compliance with regulatory, WHS and company policy requirements.

The key elements of CXC's contingent workforce management solution are shown below.



This model ensures focus across recruitment and workforce management by specialists, a streamlined approach to compliance management, a uniform contractor experience and benefits across all workers, award interpretation and consistent application of all on-costs.



CXC's service is founded on a rigorous risk and compliance management framework and application of both industry best practice and established benchmarks to help our clients achieve greater process, quality, compliance, and cost efficiencies.

PROGRAM MANAGEMENT

The focus of CXC's program management services is to introduce additional contingent worker initiatives, beyond workforce management, which enables our clients to better meet their strategic business objectives.



Initiatives include direct access to talent, maximising the effectiveness of your recruitment supplier channels and harnessing technology, process and people to create competitive advantage.



SUPPLY CHAINS

STAFFING SUPPLIER MANAGEMENT

CXC has developed agency relationships over more than 26 years, with our initial offering managing and payrolling the independent contractors of recruitment suppliers. Our service offering to corporate customers harnesses our long-standing relationships with suppliers, market insights and expertise in payment processing.

Our supply chain management programs include:

- Streamlined single cycle client invoice and outsourced payment processing to the recruitment supply chain
- Systems and processes to distribute requisitions and performance management of selected suppliers
- A CXC preferred supplier panel of pre-vetted, negotiated and proven niche recruitment providers.

CONTINGENT TALENT SOURCING CHANNELS



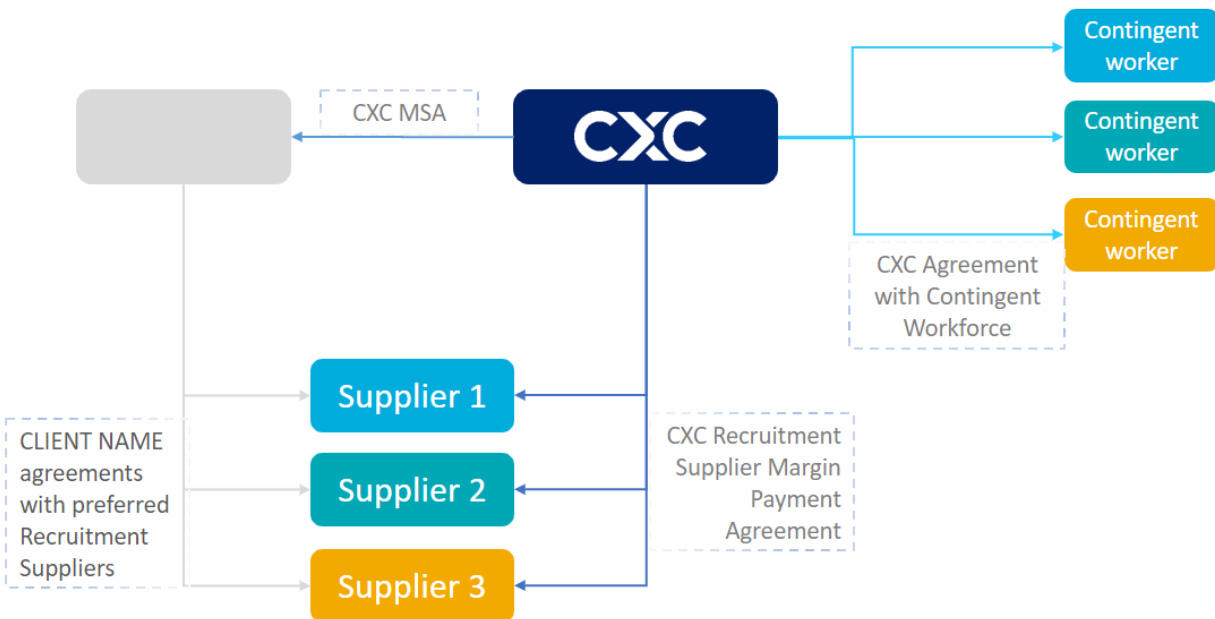
SUPPLY CHAIN

CXC can also assist sourcing by introducing our supply chain service.

Recruitment Supply Chain | Supplier Payment Model

- Client holds 'sourcing-only' agreements with recruitment agencies (includes KPIs/SLAs)
- The recruitment supplier is paid a sourcing-only margin as negotiated by Client
- CXC is responsible for payroll and all associated services (PI/PL, payroll, workers' compensation)

CXC can assist clients to determine a fair sourcing margin benchmarked against market rates



Modern Slavery Risks

For more than 25 years we have been safely and sustainably managing and payrolling the independent contractors of recruitment suppliers.

We are committed to comply with all labour, employment, immigration and whistleblower laws across the territories we operate in.

We are committed to:

- Providing a healthy and safe working environment for all our employees
- Providing a workplace free from harassment, discrimination and bullying
- Acting ethically and lawfully in all our business operations
- Engaging with our stakeholders respectfully and honestly
- Building sustainable business opportunities

We have an internal compliance audit program to assure the effectiveness of our risk control framework and compliance with our policies.

While we consider the potential for us to cause or contribute to incidents of modern slavery to be low, areas of vulnerability in our operations may exist in our overseas operations.

While the risk of modern slavery in Australia is lower than many other jurisdictions, we recognise that our Australian suppliers provide us with goods and services across all multiple risk categories and therefore will require further engagement and assessment.

Our focus has been on identifying our higher risk suppliers; however, we acknowledge that lower risk suppliers also present modern slavery risks and vulnerabilities. It is our intention to undertake a broader review and risk prioritisation of our lower risk suppliers.

We are also undertaking further work to understand the vulnerabilities and potential modern slavery risks in the non-Australian territories where we operate.

While we don't have any direct high-risk suppliers in those territories, we are aware that there is an increased vulnerability to modern slavery. We are working with our teams and clients to better understand the complete supply chain and review supplier modern slavery risks relating to our operation.

CXC is committed to continue our modern slavery risk management, supplier assessments and engagement, mitigation, mediation and review program.

We recognise modern slavery risk management as a challenging and evolving process and aim for continuous improvement.



Governance

CXC’s focus was to strengthen our understanding of potential modern slavery risks within our business, and the development of a robust management system designed to limit the risk of modern slavery occurring within our business, supply chains or business relationships.

With the support of the working group, we undertook several key activities identified in our roadmap in last years’ submission as part of our continuous improvement which have formed the basis of our modern slavery framework.

WORKING GROUP – R&C and Supply Chain Manager

To ensure that the management of modern slavery risks across our business would effectively be identified and addressed a working group was established from representatives from, Supply Chain, Risk & Compliance, Human Resources, Sales & Marketing and Client Services.

GAP ANALYSIS

The working group conducted a gap analysis to identify areas for improvement across the following categories: business management systems, human resources, supply chain management, risk & compliance, and clients.

The gap analysis provided an understanding of our current processes and management in relation to modern slavery and identified various corrective actions and improvements for better managing our response to modern slavery risks and potential breaches of human rights.



POLICY FRAMEWORK

To assist with meeting our due diligence CXC underwent a comprehensive review and development of policies, procedures, and contract agreements to articulate our commitment, expectations, and provide clear and detailed processes to provide all stakeholders with the tools and knowledge to prevent, raise a grievance or complaint of human rights violations.

MANAGEMENT SYSTEM DEVELOPMENT	PURPOSE
Code of Conduct	This policy outlines the conduct that is expected and the conduct that is deemed unacceptable at CXC. Suspected breaches of this policy will be taken seriously in any circumstance and will prompt an investigation which may result in disciplinary action.
Supplier Code of Conduct	The Supplier Code of Conduct is to outline our values and document the expectations we have of our suppliers and business partners in the areas of human rights and workplace conditions, in addition to our existing expectations in respect of ethical sourcing and conduct.
Corporate Social Responsibility	CXC is not only about business and economic factors, we are a part of the wider business and social community and as such have a moral responsibility that surrounds the social and environmental impacts of our operations.
Ethical Sourcing	The CXC Ethical Sourcing Policy is built on the principles of the ETI and ILO Conventions, to ensure there is a commitment that goods and services are sourced in a responsible manner.
Human Rights	This policy is used to underpin the commitment and inform any statement on modern slavery that CXC is required to produce as a result of legislative requirements in any country in which CXC operates.
Grievance and Disciplinary	To ensure that all CXC stakeholders are aware of their responsibilities and rights with respect to grievances, disputes and disciplinary actions.
Anti-Bribery	The purpose of this policy is to set out the responsibilities in observing and upholding the Company's position on bribery and corruption and to provide information and guidance to those working for the Company on how to recognise and deal with bribery and corruption issues.



Conflict of Interest

CXC is committed to maintaining confidence in the probity of decisions and associated procurement activities undertaken, by ensuring that Conflicts of Interest are identified, documented, and managed so that they do not affect our services, activities or decisions.

Disclosable Conduct

This procedure was developed to demonstrate the importance on ensuring a healthy, safe, and supportive environment and to create a culture where our people feel confident to raise breaches of internal rules or human rights.

EEO and Diversity

CXC are committed to ensuring our workplaces are free from discrimination and provides equal opportunities for all employees.

Supplier Questionnaire

The supplier questionnaire was developed to identify concerns or gaps in our supply chain.

Supplier Agreements

The Supplier agreements were reviewed and updated to ensure our commitment and expectations were clearly stated in tandem with the Supplier Code of Conduct.

Supplier Criticality Matrix

The supplier criticality matrix determined the risk a supplier poses and how critical the supplier is to our supply chain and operations.

Authorised Supplier Register

All approved suppliers are entered on the Authorised Supplier Register, any supplier not on the register is not to be used until mitigation and remediation processes have been enacted and the supplier is actively participating.




Training

The training material developed is to provide task specific and awareness training in regard to our legal and company requirements, obligations and their rights. The training is provided to staff via the LMS and via the MyCXC Portal for our contingent workforce.



Risk Management

CXC will continue to assess the effectiveness and impact of the activities described in this statement and our broader modern slavery framework. We are tracking the effectiveness through a combination of internal and external indicators, and we use these indicators to assess the effectiveness of each activity undertaken.

 PROCESS	 ACTIVITY	 INDICATOR
<p>SYSTEM DEVELOPMENT</p>	<ul style="list-style-type: none"> • Monitor and review of policies and procedures • Consulting of content and processes • Review of effectiveness of development system 	<ul style="list-style-type: none"> • Approved documents • Documents implemented • Effective consultation reflected via the effectiveness of the system • End of year audit • Incident reports
<p>GOVERNANCE</p>	<ul style="list-style-type: none"> • Supplier Questionnaires • Authorised supplier register • Supplier Agreements in place 	<ul style="list-style-type: none"> • Completed supplier questionnaires • Gaps identified • Register in place and populated • Updated agreements in place
<p>RISK MANAGEMENT</p>	<ul style="list-style-type: none"> • Conducting risk assessments • Assigning supplier ranking • Implementing the Supplier Criticality Matrix • Developing risk profiles 	<ul style="list-style-type: none"> • Corrective action plans derived from risk assessments • Tier ranking in place for suppliers • Criticality score applied to suppliers • Risk Profile Plan
<p>TRAINING</p>	<ul style="list-style-type: none"> • Development training material • Conduct training • Review effectiveness 	<ul style="list-style-type: none"> • Knowledge assessments • Workforce feedback • Supplier/Client feedback • Incident reports



Consultation

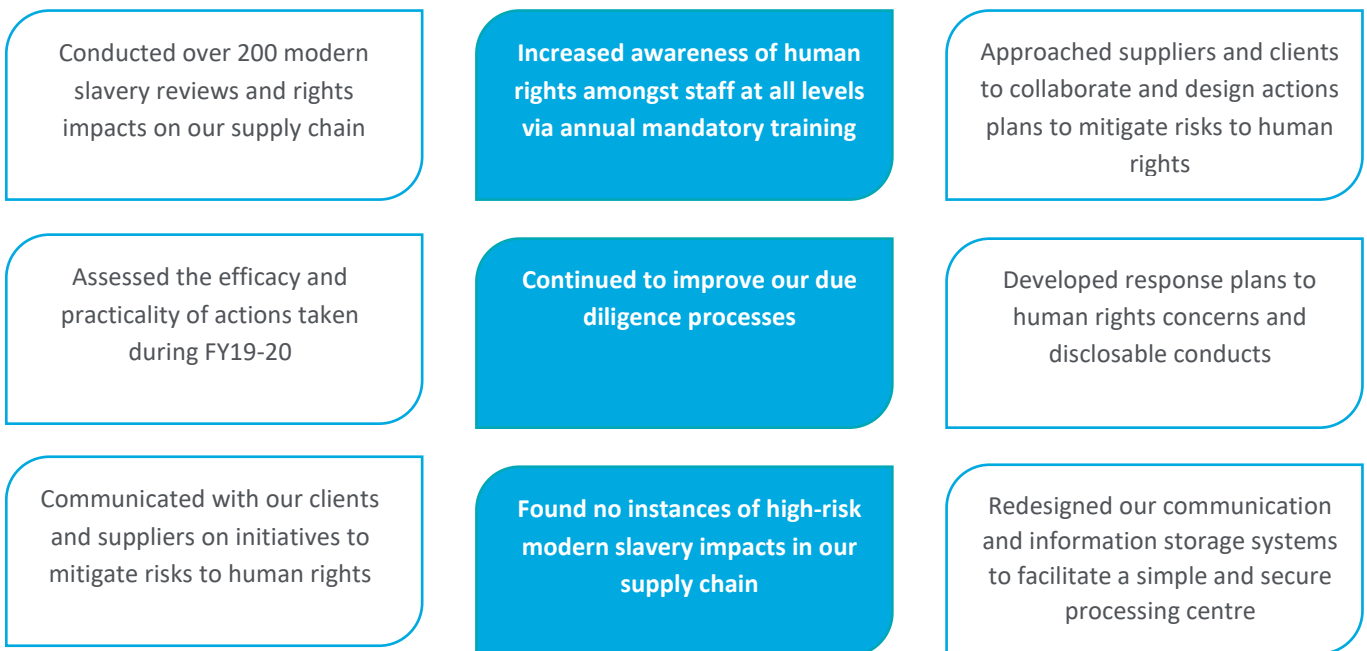
The entities CXC Corporate Services Pty Ltd and Contractor Workforce Solutions Pty Ltd share the same employee and executive structure as CXC.

All contingent workers are outsourced to clients. Annual consultation occurs with clients and suppliers to ensure a cooperative system is in place to mitigate the risk of modern slavery occurrences.

All CXC entities were involved via their representatives as part of the working group. The established workgroup will continue to be at the forefront of advocating human rights within our business.

Financial Year 2020-2021 Roadmap

In the FY20-21 CXC implemented or participated in various approaches and actions to assess and mitigate any risk of modern slavery occurring in its operations.



Future Roadmap

CXC is committed to continued identified, mitigation and remediation of human rights risks within our business and associated supply chains.

Our Modern Slavery Statement as well as the continuous improvement of our human rights management system are a key part of our commitment towards our stakeholders and our due diligence towards human rights.



The next few years will involve CXC continuing to:

Monitor ongoing human rights impacts on our supply chain

Increase awareness of human rights amongst new client stakeholders and suppliers

When identified approach high risk suppliers to collaborate and design plans to mitigate risks to human rights

Continue to assess the efficacy and practicality of actions taken

Partner with the CXC Global group to align our global strategy

Design assistance programs for affected groups

Continue to communicate with our clients and suppliers on initiatives to mitigate risks to human rights

Continuing to improve our due diligence processes

Conduct an internal gap analysis on current systems and design corrective actions

This Statement was approved by

INGRID WEBBER



DECEMBER 2021

The Principle Governing Body of CXC has reviewed and approved this statement – December 2021.





Enabling your
future workforce

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