



2021 Modern Slavery Statement



For reporting period from 1 July 2020 to 30 June 2021

Actions by Oncore to eradicate modern slavery in its business operations and supply chains



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A. Statement from Oncore



Oncore Group Holdings Pty Ltd ACN 137 343 349 ('Oncore'), is opposed to all forms of modern slavery. Oncore respects and supports the protection of human rights and is committed to human rights in the workplace and with working with clients, suppliers and partners that are aligned to our values and operate in accordance with modern slavery laws.

This commitment includes identifying, addressing, remediating and safeguarding against the risks of modern slavery practices in our business operations and supply chains, sourcing quality products and services from suppliers that share these values and respecting the dignity and worth of all employees. We are committed to the principles outlined in the United Nations Guiding Principles on Business and Human Rights.

This Modern Slavery Statement ('MS Statement') is published in accordance with the Commonwealth Modern Slavery Act 2018 (Cth) ('the Act') and details the steps taken by Oncore to prevent modern slavery in its operations and supply chains during the reporting period 1 July 2020 to 30 June 2021.

This is Oncore's 2nd MS Statement. Oncore's 1st MS Statement was published with the Australian Border Force for the period ending 30 June 2020. Oncore is committed to publishing the MS Statement each year.

B. Seven key reporting areas

1. Identification of the company

Oncore is a large privately owned company registered in Australia. Oncore is providing a joint MS Statement with One Vendor Payroll Pty Ltd ACN 135 287 071 and Oncore Consulting Pty Ltd ACN 137 348 951 which are the subsidiaries of Oncore ('Reporting Entities'). Oncore also controls the following subsidiaries:

- One Vendor Pty Ltd
- Oncore Consulting Pty Ltd
- Oncore Business Solutions Pty Ltd
- One Vendor Payroll Pty Ltd
- Oncore Contractor Solutions Pty Ltd
- Oncore ECM Solutions Pty Ltd
- Oncore Administrative Services SAS
- Oncore Business Solutions (NZ) Limited
- Oncore Consulting (NZ) Limited
- One Vendor Payroll (NZ) Limited
- Oncore (UK) Ltd
- Oncore Business Solutions (UK) Ltd
- IT Global (UK) Ltd

2. Oncore's Structure, Operations and Supply Chains

Structure and operations

Oncore is a global company specialising in payment solutions for professional contractors, recruiters and corporates - all backed by leading technology and infrastructure. Our operations include all aspects of flexible workforce management, payroll and administration, from salary packaging and contractor care to risk mitigation of contingent workforce or complete outsourcing of the back office for Recruiters. Oncore has over 20 years of experience in this specialist market, engaging with thousands of contractors across Australia, New Zealand and the UK. Oncore is comprised of several companies controlled by a Board of Directors. We have various offices throughout Australia and further offices in New Zealand, The United Kingdom and Columbia.

Our total direct workforce for this reporting period was 48 in Australia, 5 in The United Kingdom and 5 in Columbia. Oncore also used 4 internal contractors during this time. During the reporting period Oncore has on hired 584 individual contractors and 771 corporate contractors.

Supply chains

Oncore has identified that its main supply chains are in Australia. During the reporting period Oncore has engaged directly with more than 100 different suppliers which includes insurance, office and information technology equipment, professional services and maintenance services. Our largest category of spend was on Insurance.

Policies and procedures

Oncore's Core Values, Code of Conduct and policies and procedures set the behavioural standards for Oncore and reflects our commitment to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our operations or supply chains.

Oncore's Four Core Values describe what we stand for and guide us. They are the following:

TRUST

Always act with integrity & deliver on our promises

SIMPLICITY

Find new & smarter ways to make things easy and simple

OWNERSHIP

Empower each other to drive performance & growth

PEOPLE

Share our skills, knowledge & experiences and become one team

Through a strong culture of safety and transparency, we continue to drive better processes and procedures as a team to ensure we are truly enabling the wider workforce to enjoy freedom whilst remaining compliant.





Oncore’s Code of Conduct, which links to our values, addresses the professional, ethical, financial and social values of Oncore and represents the commitment of Oncore and its employees to our customers, contractors and the communities in which we work and live.

Oncore has policies and procedures that confirms our commitment to human rights in the workplace including:

- Modern Slavery Policy
- Human Rights Policy
- Antibribery and Corruption Policy
- Whistleblower Policy
- Diversity and Inclusion Policy
- Grievance Resolution Policy
- Workplace Behaviour Policy
- Workplace Health and Safety Policy



3. Risks of Modern Slavery in Operations and Supply Chains

Oncore has reviewed its modern slavery practices risks across our operations and supply chains using a targeted and risk-based approach in line with the United Nations Guiding Principles on Business and Human Rights. Oncore has considered the following: sector and industry risks, product and services risks, geographic risks and entity risks and we have been able to identify areas of no or low risk, for example operational activities that are directly undertaken by Oncore employees. We have identified potential risk, for example where a local third-party supplier may source a technology product from overseas sources. We will use these potential risk scenarios to prioritise our supplier engagement activities in the future. We are also refining the traceability of goods and services within our supply chain.

The general risk areas for modern slavery in Oncore's business operations and supply chains include:

a. Operations

- **Sector and Industry Risks** - Oncore recognises that the following sectors or industries have a higher risk of modern slavery: cleaning services, domestic work, construction, manufacturing, mining, textiles, agriculture and fishing. Oncore does not operate in any of these sectors. Oncore operates in certain sectors and industries that may have modern slavery risks because of their characteristics and processes, such as the use of short-term contracts and outsourcing, the use of foreign workers or potential recruitment strategies by suppliers, their agents, or labour-hire agencies.
- **Product and Services Risks** - Oncore uses the following products in its operations that have a higher risk of being linked to modern slavery: garments and electronics.
- **Geographic Risks** - Oncore operates in countries that may have higher risks of modern slavery due to, among other things, poor governance, weak rule of law, conflict, migration flows, and socio-economic risk factors, such as lack of educational and training opportunities and poverty. However, Oncore does not have any operations located in and does not source workers from any of the top ten countries with the highest risk of modern slavery as per the 2018 Global Slavery Index. These highest risk countries include the following: North Korea, Mauritania, Eritrea, Burundi, Central African Republic, Afghanistan, South Sudan, Pakistan, Cambodia and Iran.

b. Supply Chains

Sector and Industry Risks - Oncore has suppliers in the following sectors or industries which have a higher risk of modern slavery: cleaning services, construction services and textiles services.

Product and Services Risks - Oncore obtains the following products or services from suppliers that have a higher risk of being linked to modern slavery: garments and electronics. Oncore may obtain certain products and services from suppliers that may have high modern slavery risks because of the way such products or services are produced, provided, or used, such as:

- delivery timeframes might require suppliers to engage in excessive working hours, make cost savings on labour-hire or rapidly increase workforce size;
- the product is made in countries where there is a high risk of labour exploitation reported by international organisations.

Geographic Risks – A large number of our suppliers are based in Australia. Oncore has suppliers in one or more countries that may have higher risks of modern slavery. However, Oncore does not have any suppliers located in any of the top ten countries with the highest risk of modern slavery as per the 2018 Global Slavery Index.



4. Actions Taken to Assess and Address Modern Slavery Risks

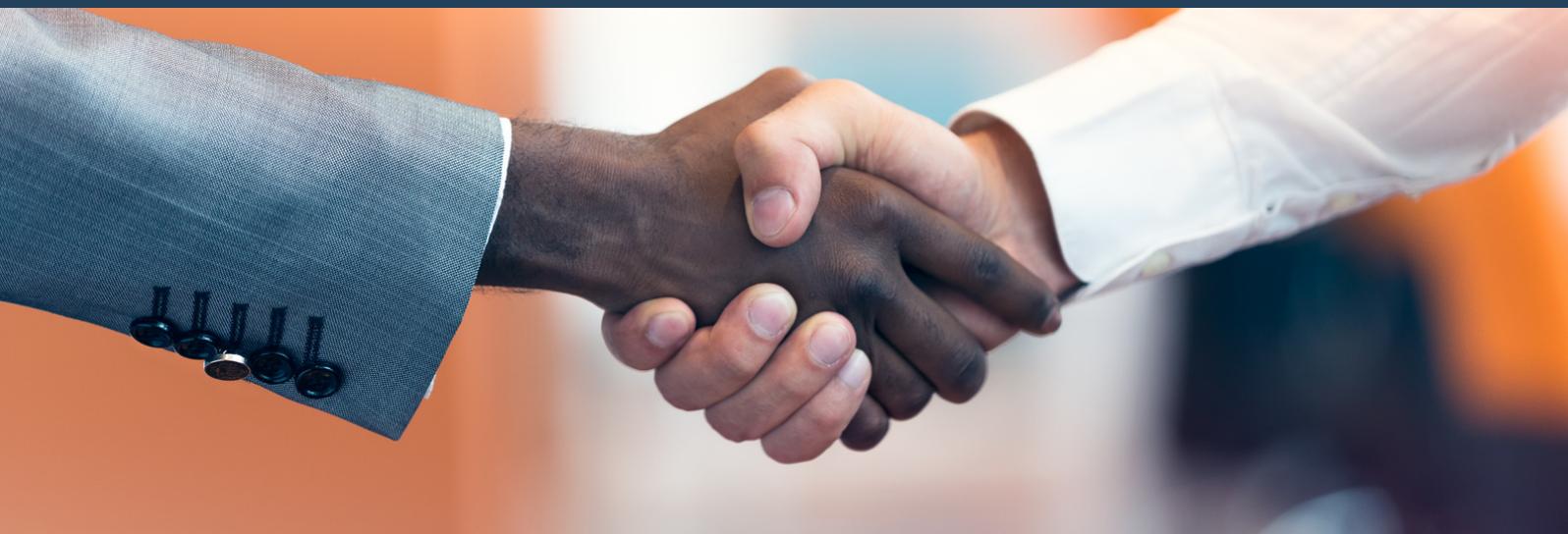
Oncore has various systems, processes and procedures and has taken the following action and due diligence to identify, prevent, mitigate and account for how we address modern slavery risks in our operations and supply chains including:

Modern Slavery Act – We published our first MS Statement with the Australian Border Force. The Oncore 2020 MS Statement can also be found on our website at: <https://www.oncoreservices.com/au/policies/>

Governance – We reviewed our governance, risk and compliance frameworks and allocated responsibility for assessing and addressing modern slavery risks to the Legal Team.

Brought Together Key Areas - Key departments were convened, including the Legal Team, Human Resources, Finance, Risk, Senior Management and the Board to assist with the assessment of key risks. The Board and other Senior Management were briefed on the progress of action taken.

Action Plan – We reviewed the Oncore Modern Slavery Risk Management System and the Oncore Modern Slavery Act Five Year Plan which has since evolved and is continually updated. This system sets out how Oncore will improve its response to modern slavery risks including measurable outcomes. It includes details of our policies and procedures, supplier process, supply chain audit (onboarding, audit, review and engagement), education and training and response procedures.



Continued

Modern Slavery Act Policy – We created and published the Oncore Modern Slavery Policy which outlines our approach to reducing the risk of modern slavery practices and applies to all workers and everyone we do business with. This policy can be found on our website.

Policies and Procedures – We reviewed and updated existing policies, procedures and systems to help ensure not only a fair workplace, but also the minimisation of modern slavery risks in our business operations and supply chains and ensured that some of those policies are available on our website.

Modern Slavery Due diligence – We continued our review and mapping of our operations and supply chains to assess modern slavery risks and to improve our understanding about what is happening in our supply chains.

Human Rights Due Diligence - We performed due diligence to identify and assess human rights impacts. We continued our care for our workers (staff and contractors) including:

- Providing meaningful consultation - We have continued direct and frequent contact with workers including phone check in calls to provide workers with support, sector-specific welfare checks to remote workers and regular surveys to capture feedback and address issues.
- Providing programs including the Oncore Employee Assistance Program which includes private free counselling sessions.



Continued

Human Rights Due Diligence - continued...

- Ensuring all workers have copies of agreements that detail the terms and conditions of their assignments including rates of pay, hours worked, entitlements and safety.
- Performing audits and training of applicable staff to ensure all workers have verified photo identification, right to work checks, are over the age of 18 years and are paid a minimum wage in line with the Australian National Employment Standards and Modern Awards.

Education and Training – We implemented high level training of the Legal Team. We continued the training of staff in key departments about modern slavery risks and worked on creating a modern slavery online training program for all staff.

Grievance Mechanisms – We reviewed our grievance mechanisms (including our Whistleblower Policy) to ensure that they are accessible, predictable, equitable and transparent to allow the safe reporting of modern slavery risks. We ensured that these mechanisms are confidential and protect worker's privacy. This Policy can be found on our website.

Labour Hire Licences – We held and continue to hold a labour hire licence in both Queensland and Victoria (all states where we are required to be licenced). Such licences are to protect workers from exploitation and to improve transparency and integrity in the labour hire industry.

Membership - Continued Corporate membership with SIA (Staffing Industry Analysis) and reviewed the resources they have available to keep Oncore up to date.



5. Assessment of Effectiveness of Actions Taken by Oncore

Oncore is committed to continual improvement, transparent reporting and to assessing the effectiveness of our ongoing actions to assess and address modern slavery risks. This includes the following:

- Consulting with Reporting Entities about the effectiveness of action taken.
- Establishing a process to regularly review, monitor, manage our actions and report progress on a range of indicators used to assess the effectiveness of our programs and performance in line with our Oncore Modern Slavery Act Five Year Plan. This Plan is continually updated and reviewed.
- Conducting audits and surveys and reviewing, comparing, tracking, documenting and comparing the results.
- Reviewing and updating policies regularly and implementing risk assessment processes to ensure they remain up to date.
- Setting up a process to provide for regular engagement and feedback between key departments.
- Tracking modern slavery training, including keeping records of the number of staff who have completed training and when training is updated and repeated.
- Tracking suppliers and the number of suppliers who have been screened.

6. Entity Consultation

Oncore recognises that all the Reporting Entities within Oncore have a role to play in addressing modern slavery risks.

We have consulted and continue to consult with each of the Reporting Entities and key departments within Oncore to prepare this MS Statement and to help assess and respond to key risks.

The company secretary for each Reporting Entity is aware that this MS Statement is being prepared, has viewed the MS Statement and has had the opportunity to participate in the process.



7. Other Relevant Information - Covid-19 Impact

Impact of Covid-19 - The ongoing Covid-19 pandemic may have increased the vulnerability of workers in our supply chains to modern slavery risks and Oncore continues to assess and address the new modern slavery workplace risks resulting from the pandemic. Oncore implemented various initiatives during the reporting period to help our workers in the pandemic.

One of the difficulties experienced in this reporting period was implementing face to face training. Close contact training was not a viable option as a result of the pandemic. Oncore has investigated alternative ways and systems to train staff regarding modern slavery risks. This new training program will be executed in the next reporting period.

Future Action and Goals - Oncore is committed to continuous improvement on how we identify, address, remediate and safeguard against the risks of modern slavery practices in our operations and supply chains. We continue to refine our response, processes and procedures in relation to modern slavery and over the next year we will focus on:

- Reviewing and updating our policies and procedures
- Reviewing our contractual terms with suppliers
- Reviewing our ongoing assessment of our supply chain
- Reviewing and improving staff awareness and education
- Continued learning and consultation with industry bodies, business partners and suppliers



C. Board Approval and Signature

Principal Governing Body Approval

This Modern Slavery Statement for Oncore, the parent entity, was approved by the principal governing body of Oncore, being the Board of Directors of Oncore, as defined by the Modern Slavery Act 2018 (Cth) on 18 November 2021.

Signature of Responsible Member

This Modern Slavery Statement is signed by a responsible member of Oncore who is a Director.

Grant Alexander Gee
Director
Oncore Group Holdings Pty Ltd



Date: 8 December 2021