



# Modern Slavery Statement

absolute peace of mind

# Modern Slavery Statement

---

## 1. Introduction

This statement is published on behalf of P20 ESG Acquisition and its subsidiaries' ("ES Group") commitment to eliminating the exploitation of people under the *Modern Slavery Act 2018* (Cth) (the Act). ES Group is committed to supporting ethical and compliant practices in the provision of our services. This statement is published in accordance with section 12 of the Act. References to "ES Group" we," "us," or "our" are to the aforementioned named entities.

## 2. Our organisational structure

ES Group is part of the People 2.0 global group, a contingent workforce specialist provider operating through a number of separately constituted and regulated legal entities which provide contractor management solutions for recruitment agencies, large corporates, small to medium enterprises, consultancies and independent contractors in accordance with the relevant laws of the jurisdictions in which they respectively operate. ES Group combines unmatched industry knowledge, an outstanding compliance record and superior customer service to simplify processes and ease the complexities associated with flexible work arrangements. Further information about the People 2.0 global group, including information on the countries in which we operate, can be found on our website by <https://www.people20.com/>.

Our head office is in the US and our APAC regional office located in Melbourne Australia.

We value transparency and compliant employment practices based on honesty and integrity and aim to provide a quality trustworthy service.

## 3. Our supply chains

We work closely with recruitment agency partners, who source contractors for placements with clients. Our external business supply chain involves engaging with contractors, agency and clients for the supply of the contractor's services to clients. Our internal supply chain relates to our office facilities such as IT, telecoms, refreshments, and cleaning services.

We understand whether as a client or as a supplier, there is always some risk that may contribute to modern slavery practices. We expect our suppliers to commit to ethical standards and to operate in an ethical, legally compliant and professional manner. We also expect our suppliers to promote compliant employment practices based on honesty and integrity and aim to provide a quality trustworthy service.

## 4. Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains, or in any part of our business. Our Modern Slavery Policy 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 and human trafficking is not taking place anywhere in our supply chains and partnerships.

We value partnerships and suppliers who support these principles and impart our attitude towards

compliance to the organisations we work with. We recognise the importance of this ethos within the labour hire sector and can demonstrate our commitment to compliance through the following steps. These include:

- award of sector specific employer accreditations
- award of country specific temporary worker licencing authorisations
- membership of employment organisations
- adherence to specific collective agreements
- adherence to health and safety audits
- assessment of working environments
- adherence to minimum wage regulations
- regular communication and contact with contractors, agencies and clients
- adherence to working time regulations
- requiring contractual commitments from our partners to modern slavery legislation

## **5. Due diligence process for slavery and human trafficking**

As part of our initiative to identify and mitigate risk, we have a legal team based in Australia and work closely with local lawyers in each jurisdiction in which we operate to ensure that we are engaging contractors compliantly in line with local labour laws. Our legal team works closely with the sales and operations departments to ensure compliance alignment. This enables us to work collaboratively to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect against illegal working practices.

In relation to our internal suppliers, we engage with recognised telecoms and facilities providers, ethical local food suppliers, and local cleaning providers with whom we have a long-standing relationship.

Below are the steps taken within the business to support Modern Slavery compliance practices:

### **1. Review of our suppliers**

Requesting our current and prospective suppliers to provide information to understand their processes and commitment to address modern slavery risks. We have enhanced our own procedures to mitigate modern slavery risks and reviewed the standard supplier agreement to include specific references to modern slavery law compliance.

### **2. Client due diligence cooperation**

ES Group clients operate globally in many industries. We are committed to complying with our clients' own practices on the prevention of modern slavery. ES Group has participated in our clients' audits of their respective supply chains.

### **3. Employees to raise concerns under the Whistle Blower Policy**

ES Group is committed to promoting a culture of honest and ethical behaviour, corporate compliance and good corporate governance by providing a convenient and safe reporting mechanism. Modern slavery non-compliance can be reported by employees through the ES Group whistle blower policy and procedure. The policy ensures that any reports of potential

misconduct are dealt with discreetly and appropriately and that employees are protected from victimisation and retaliation.

#### **4. Training**

To ensure that ES Group staff are aware of our commitment to comply with Modern Slavery laws, Modern Slavery training has been delivered to our internal customer delivery team. We endeavour to roll out this training to the rest of the business to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

### **6. Risk assessment & measuring effectiveness**

ES Group regularly assesses the risks of non-compliance when engaging with new business deals to ensure it provides the highest standard of service. We work collaboratively from a compliance perspective with individuals across the following departments in order to ensure all those in our supply chain and contractors adhere to our values.

- Legal
- Audit and compliance
- Finance
- Operations
- Sales

ES Group measures the effectiveness of the steps it takes by educating internal staff and external partners in relation to labour compliance, reviewing internal policies and procedures and monitoring feedback.

### **7. Future steps and review**

ES Group believes in seeking continuous improvement opportunities to raising standards. We will continuously develop our policies, procedures and training to support our compliance responsibilities.

This statement has been approved by the sole director of P20 ESG Acquisition Pty Ltd 30 March 2021.

### **8. Further information**

For further advice please contact the Legal and Compliance Department or email [compliance@entitysolutions.com.au](mailto:compliance@entitysolutions.com.au).

A handwritten signature in black ink, appearing to be 'Neil Merola', written over a light blue circular stamp.

Signed by:  
Neil Merola – Director  
P20 ESG Acquisition Pty Ltd.