

Sidekicker Modern Slavery Statement

1. Background and Purpose

Sidekicker Group has a zero-tolerance approach to modern slavery within our business and supply chain. This is our third Statement for Australia covering the following entities: The Sidekicker Group Pty Ltd and Lend Me A Hand Pty Ltd. The Sidekicker Group Pty Ltd also wholly owns a New Zealand entity (Sidekicker New Zealand Limited).

Sidekicker owns a labour hiring business with operations in almost all states in Australia and in New Zealand (Auckland, Wellington and Christchurch). We own an online Sidekicker Platform, and we use technology to improve the way labour hire works for businesses and workers. We employ around 95 full time employees, with over 90% of employees based in Australia. In addition, we also employ around 17,000 on-hire workers (known as “Sidekicks”) who provide labour hiring works for our clients (or host employers). We employ most of our Sidekicks as casual employees, with a smaller number of them engaged under fixed term, maximum term, or permanent employment arrangement.

Sidekicker is committed to respecting internationally proclaimed human rights and fair labour practices, and we recognize the key responsibility we have within the supply chain of providing skilled labour to ensure that all individuals sourced, procured or engaged are treated fairly, ethically and in compliance with legislative requirements. Our standard practices are designed to protect Human Rights throughout the recruitment, selection and payment cycle.

We believe that forced labour has no place in our operations or supply chains and that business and governments need to work together to make progress on this complex issue.

2. Identify Risk in Labour Hire Industry and Supply Chain

Sidekicker acknowledges that the types of exploitation captured by modern slavery can be complex, multi-faceted and difficult to spot. It can extend to entering into a commercial transaction involving forced labour, or exercising control over or providing finance for any commercial transaction involving such exploitation.

Risks that could arise in Sidekicker’s business may include:

- underpayment, and exploitation of migrants, and health and safety risks, especially when recruiting workers for “high risk sectors” such as horticulture, meat processing, cleaning, security etc.; and
- labour conditions and child labour in the supply chain of manufactured goods, such as electronic equipment, uniforms and other office supplies.

Actions taken by the reporting entity to reduce risk

Sidekicker’s Engagement of Suppliers

Sidekicker predominantly engages suppliers that represent a lower inherent risk of modern slavery and that benefit from a more mature control environment, namely, technology, marketing and business services.

With some exceptions (such as merchandise, computers and hardware), purchases of goods and services do not involve material usage of raw materials and practices commonly associated with modern slavery. We acknowledge that Sidekicker’s visibility of modern slavery risks may be limited as a result of risks being deep within the supply chains of Sidekicker’s direct suppliers.

The table below sets out some goods and services within Sidekicker’s supply chains with inherent modern slavery risks:

<u>Goods</u>	<u>Services</u>
<ul style="list-style-type: none"> - Coffee, tea and other beverages - Food stuffs - Cleaning and medical products - Computer equipment and peripherals - Office furniture - Networking and cabling - Apparel and branded merchandise - Printing, consumables and stationery 	<ul style="list-style-type: none"> - Cleaning services - Facilities management and maintenance - Construction and building services - Legal and consulting services - Digital media channels and creative agencies - Technology service providers

Sidekicker recognizes that we are early in our implementation of modern slavery mitigation. We have limited visibility beyond the first tier of suppliers and hope to review this in the future.

3. Sidekicker holds Labour Hire Licenses

Sidekicker (through its trading company Lend Me A Hand Pty Ltd) holds labour hire licenses in the following jurisdictions:

State	License Numbers
Victoria	VICLHL01134
Queensland	LHL-00158-S7G3T
South Australia	LHS 297702
Australian Capital Territory	ACTLHL00002451

The objectives of the Australian labour hire licensing schemes are, broadly, to protect workers from exploitation by labour hire providers and their clients (hosts), to improve the transparency and integrity of the labour hire industry, and to promote responsible practices in the industry.

License holders are required to meet strict fit and proper person and compliance tests as well as regular reporting requirements.

4. Sidekicker Policies & Commitments

Sidekicker does not tolerate slavery, human trafficking, force, child labour or child exploitation of any kind, and we have a suite of policies, procedures and practices in place that assist us in managing human rights, promoting diversity and ensuring compliance with legislation.

Policies for Sidekicker's Headquarters Employees

- Anti-Bribery and Anti-Corruption Policy [accessible from Confluence / intranet, and Sidekicker website at <https://sidekicker.com/au/corporate-governance/>]
- Anti-Discrimination and Sexual Harassment Policy [accessible from Confluence/ intranet]
- Diversity and Inclusion Plan [accessible from Confluence/ intranet]
- Employee Code of Conduct [accessible from Confluence/ intranet]
- Flexible Working Policy [accessible from Confluence/ intranet]
- Gift and Entertainment Policy [accessible from Confluence / intranet, and Sidekicker website at <https://sidekicker.com/au/corporate-governance/>]
- Grievance Resolution Policy & Procedures [accessible from Confluence/ intranet]
- Whistleblower Protection Policy [accessible from Confluence / intranet, and Sidekicker website at <https://sidekicker.com/au/corporate-governance/>]
- Work, Health, Safety & Wellbeing Policy [accessible from Confluence/ intranet]
- Workplace Bullying Policy [accessible from Confluence/ intranet]

Training Sidekicker's Headquarters Employees

It compulsory for all new employees in our head office to complete the following compliance training:

- [Modern Slavery Act Awareness Training](#)
- [Whistleblower training](#)
- [Anti-Bribery 101](#) for Mindtools to Business (this is for the UK, but similar principles can be applied to Australia and New Zealand).
- [Privacy](#) training
- [Equal opportunity for workers](#)
- [Equal opportunity for managers and supervisors](#)

Internal Compliance Policies Relating to Management of Sidekicks

- Health and Safety Management System
- Industrial Relations Policy
- OH&S Process
- Pre-Employment Requirements
- Serious Injury Protocol
- *Work, Health, Safety Management Framework*

Policies for Sidekicker's On-Hire Workers / Sidekicks

- Modern Slavery Policy [*published at Sidekicker website at <https://sidekicker.com/au/corporate-governance/>]*
- Anti-Bribery and Anti-Corruption Policy [*published at Sidekicker website at <https://sidekicker.com/au/corporate-governance/>]*
- Anti-Discrimination and Sexual Harassment Policy [*accessible from Sidekicker website <https://help.sidekicker.com/en/articles/1247419-anti-discrimination-and-sexual-harassment-policy>]*
- Gift and Entertainment Policy [*accessible from Sidekicker website at <https://sidekicker.com/au/corporate-governance/>]*
- Grievance Resolution Policy (Sidekicks) [*accessible from Sidekicker's website at <https://help.sidekicker.com/en/articles/1247637-grievance-resolution-policy>]*
- Staff Interaction Policy [*accessible from Sidekicker's website at <https://help.sidekicker.com/en/articles/2277825-sidekicker-staff-interaction-policy>]*
- Whistleblower Protection Policy [*accessible from Sidekicker website at <https://sidekicker.com/au/corporate-governance/>]*
- Work, Health, Safety & Wellbeing Policy [*accessible from Sidekicker's website <https://help.sidekicker.com/en/articles/1247646-work-health-safety-wellbeing-policy>]*
- Workplace Bullying Policy [*accessible from Sidekicker's website at <https://help.sidekicker.com/en/articles/1247447-workplace-bullying-policy>]*

Sidekicker has a Whistleblower Protection Policy that allows any employee, officer, contractor, supplier of services or goods, and any relative/ dependent/ spouse of these individuals to raise a concern of wrongdoing to Sidekicker. Reports can be made through the whistleblower channel via the nominated email compliance@sidekicker.com.au or to any “eligible recipients” set out in the policy.

5. Sidekicker Approach in Managing Modern Slavery Risks in Labour-Hire Business

To mitigate the above risks listed,, Sidekicker requires all of our clients to pay to or above the relevant awards. This eliminates any risk of underpayment. Before being allowed to hire any workers, our team must complete a health and safety assessment onsite to ensure it is a safe and compliant work site.

As well as ensuring the Sidekicker policies and procedures are communicated, understood and complied with, Sidekicker ensures that:

- Sidekicker has rigorous processes and systems in place to ensure all workers are paid correctly and in line with their entitlements and the Sidekicker Platform is integrated with our payroll system Employment Hero to ensure compliance.
- We have a range of employment engagement methods depending on the needs of our clients but in all cases (and through the way the Sidekicker Platform is set-up), individuals are free to apply for work, free to turn down an offer of work, and free to leave work at any time.
- We do not charge our on-hire workers (Sidekicks) any fees for sourcing work opportunities on their behalf.
- We do not retain the passport of any of our workers.
- Our employment conditions adhere to the legislation relevant to the jurisdiction in which we operate. In cases where our policies and practices provide greater advantage to an individual, this will take precedence.
- All workers (Sidekicks) must complete compulsory pre-employment checks, including a verification of working rights before gaining access to the Sidekicker Platform. We comply with our pre-employment checks process, including verification through Certsy (a third party, purpose-built system used for secure credential verification), if relevant.
- Every single worker is provided with a copy of the terms and conditions of their engagement including rates of pay and entitlements.
- *We provide and make available ongoing training (including Modern Slavery Act Awareness, Equal Opportunities for Workers, Preventing Bullying and Harassment trainings) accessible via learning platform Go1 for our people within Sidekicker who are responsible for sourcing and placing workers (Sidekicks).*

6. Sidekicker Work Health and Safety

Our on-hire workers (Sidekicks)'s health and safety is our paramount concern. Apart from having relevant policies and procedures in place (including those set out in paragraph 3 above), Sidekicker takes rigorous steps to ensure that our on-hire workers (Sidekicks) have a safe working environments:

On-Hire Workers (Sidekicks) Governance

- All Sidekicks are required to undergo WHS testing and education during their Sidekicker interview and induction. This includes rigorous screening to identify core skills and qualifications which then influence the areas and types of work a Sidekick can conduct. For example, pick packers and general assistant staff need to demonstrate their ability to safely lift a minimum of 20 kgs.
- During the Sidekicker interview Sidekicks will only be approved for roles that match the skill testing and health and safety testing that they have passed. Our permissions engine within the Sidekicker product ensures that Sidekicks are only ever notified and able to apply for shifts that match their skills and qualifications.
- All Sidekicks must complete an OH&S Induction to have their account approved, as part of the compulsory onboarding process. Sidekicker's induction is completed via typeform and consists of a video on safe manual handling, followed by a questionnaire.
- All Sidekicks work in warehousing are required to complete a Medical Assessment Questionnaire, which is designed to minimise the risk of workplace injury and ensure Sidekicks are fit for work.

Clients Governance

- All Sidekicks must complete appropriate training. Sidekicker works with clients to ensure that all staff have received any required training for the work to be performed and are provided with all safe work procedures relevant to the workplace.
- For clients operating in industries such as warehousing, manufacturing and manual labour, the WHS requirements are much more stringent given the higher risk environment / nature of work. The process for onboarding these clients involves a rigorous OH&S check supported by our in-house Health and Safety team and a third party expert (Aegis).
- At the end of every shift worked, Sidekicks are required to enter a rating and review of how the shift went. This data is used to ensure we have real time views of the safety of the worksite from both a physical and mental standpoint.
- Health and safety concerns are managed by our Safety and Compliance Team who creates a report in our health & safety reporting system, PagerDuty. The concern is then triaged to the relevant teams within Sidekicker, who are notified with required next steps.

7. COVID-19 Impacts

The health and safety (including the Covid-19 transmission risk) of our Sidekicks remains squarely at the forefront of Sidekicker's risk management strategy, and is our paramount priority during the Covid pandemic. Sidekicker worked closely with our Sidekicks and Clients to ensure that any health and safety directions, guidelines or laws imposed by the government authorities in relation to managing Covid-19 cases have been complied with and carefully observed.

Sidekicker has a "AU and NZ Covid-19 Policy" in place which sets out the process and required steps to be taken when, for example, a Sidekick has experienced Covid-19 symptoms, has become a close contact of a Covid-19 case, tested positive to Covid-19, or if someone the Sidekick has recently worked with tested positive for Covid-19. The Policy is updated from time to time, in line and consistent with the updated guidance, directions or laws imposed by the government authorities.

8. Membership with SEDEX

Sidekicker has continued its membership of Sedex as a supplier (B member) under the industry classification of "N- Administrative and support service activities- Employment activities". As part of its membership with Sedex, Sidekicker continues to maintain its commitment to update the Self-Assessment Questionnaire ("SAQ").

9. Sidekicker is a RCSA Corporate Member

As an RCSA Corporate Member, Sidekicker is bound by the RCSA Code of Professional Conduct which was authorised by the Australian Competition and Consumer Commission in 2019.

Under the Code, Members are accountable to RCSA for meeting the Code's standards of professional conduct. Specifically, the Code requires Members to adopt values of personal professionalism and operational integrity which, amongst other things, require Members to:

- protect work seekers from exploitation (including forms of modern slavery);
- conduct business in a way that avoids causing or contributing to exploitation through their activities;
- seek to prevent or mitigate risks of exploitation that are linked to their operations or services by their business relationships, even if they have not contributed to those risks.

Exploitation is defined in the Code in the following way:

Exploitation, of one person (the victim) by another person, occurs if the other person's conduct causes the victim to enter into any of the following conditions:

- i. slavery, or a condition similar to slavery;
- ii. servitude;
- iii. forced labour;
- iv. forced marriage;
- v. debt bondage.

It also includes serious breaches of the Fair Work Act 2009 (Cth), the Employment Relations Act 2000 (NZ) and unconscionable conduct within the meaning of the common law or the Australian Consumer Law.

RCSA Members are to meet and are responsible for ensuring that their staff meet the standard of professional conduct required by the RCSA Code.

10. APPROVAL AND CONSULTATION

This Statement is a joint statement submitted by The Sidekicker Group Pty Ltd on behalf of its related body corporates (including Lend Me A Hand Pty Ltd). This followed briefings and consultation with representatives from the Leadership, Marketplace & Operations, Safety & Compliance, People & Culture, and Legal teams.

This Statement was approved by the board of directors on **December 22nd 2023** and is made pursuant to the Modern Slavery Act 2018 (Cth).



Jacqui Bull

COO/ Director

The Sidekicker Group Pty Ltd

Mandatory reporting criteria	Paragraph References
1. Identify the reporting entity	Paragraph 1
2. Describe the reporting entity's structure, operations and supply chains	Paragraph 1
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Paragraphs 2-9
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Paragraphs 2-9
5. Describe how the reporting entity assesses the effectiveness of these actions	Paragraphs 2-9
6. Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Paragraph 10
7. Any other information that the reporting entity considers relevant	NA