

# RGF Staffing APEJ Modern Slavery Statement



## Modern Slavery Statement # 2

*RGF Staffing APEJ 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.*

### Governance

RGF Staffing APEJ (Asia Pacific Excluding Japan) previously Chandler Macleod Group Limited, referred to as 'RGF Staffing' and its related companies including:

- AHS Services Group Pty Ltd ("AHS")
- Aurion Corporation Pty Ltd ("Aurion")
- Chandler Macleod Managed Training Services ("MTS")
- Chandler Macleod – Staffing Services ("Chandler Macleod")
- Chandler Macleod People Insights Pty Ltd ("CMPI")
- Chandler Macleod x-PO Talent Solutions ("Talent Solutions")
- Leaders IT Services Pty Ltd ("Leaders IT")
- OCG Consulting ("OCG")
- Peoplebank Group Limited ("PBG")
- Vivir Healthcare Pty Ltd ("VIVIR")

acknowledge our responsibility under the Modern Slavery Act and understands that we must take steps to ensure modern slavery is not occurring in our operations or our supply chain. We are committed to taking necessary actions to reduce the risk of modern slavery through regular risk assessment activities and open engagement with our suppliers on the issue of modern slavery.

RGF Staffing provides a centralised governance framework for our group of companies to leverage and oversee modern slavery risks within our supply chains and operations. Our Board of Directors formally reviews and approves our annual Modern Slavery Statement, before it is published.

## About Us and our supply chain

RGF Staffing APEJ (Asia Pacific Excluding Japan) is part of a global group [RGF Staffing](#), one of the world's largest HR services providers, with activities in Europe, the UK and North America.

RGF Staffing APEJ operate in the following sub-set of locations within the RGF staffing group:



The RGF Staffing APEJ Pty Ltd Board of Directors consists of five (5) directors who are nominated and elected by the full board of directors of RGF Staffing B.V. (executive & non-executive directors jointly).

Day to day management of RGF Staffing APEJ is delegated to the CEO and each subsidiary brand is managed by an Executive General Manager, accountable to the CEO. RGF Staffing APEJ PTY LTD is domiciled in Australia and our head office is in Sydney.

RGF Staffing's mission is to create opportunities for life with over 1,000 internal employees and 29,000 employees on client sites, RGF Staffing APEJ is one of Australasia's largest employers. We service 3500 clients from our 25 offices spread across Australia, New Zealand, Hong Kong and Singapore.

Our key suppliers include software and information technology partners and shared services providers (such as cleaning services, uniform suppliers, stationary suppliers). Whilst our suppliers are geographically diverse, the majority are located in jurisdictions with similar requirements and awareness of modern slavery risks.

During 2021, our Modern Slavery Working Group (MSWG) was merged into our new RGF Staffing Sustainability Committee. This committee oversees the groupwide corporate responsibility and sustainability activities, including the integration of activities designed to identify and reduce modern slavery risks and support human rights for all.

The committee provides groupwide oversight and planning activities of all sustainability related activities and ensures that we have robust processes in place to identify, monitor and report on material risks identified, including the integration of Modern Slavery related activities into the business practices across the group.

Our Chief People Officer (CPO) chairs this committee, is responsible for reporting on these activities to the Board or Directors, including our Chief Executive Officer.

## **Our risk assessment process**

Our risk assessment approach uses a combination of industry-related risk factors such as sector, supply type and service as well as country/location risk factors and we perform periodic assessment of our existing suppliers as well as assessment of new suppliers prior to engagement.

Our assessment of first tier suppliers has indicated that most of our suppliers operate in Australia and other low risk countries (e.g. UK), and mostly in high-skilled and professional services industries. Regardless, we have requested that our suppliers complete our Modern Slavery Risk assessment survey and provide copies of their Modern Slavery Statement or in the event that the supplier advises they are not covered by the Modern Slavery Act. (e.g. less than \$100m) that copies of related policies and procedures are supplied.

## **Supply Chain Assurance Program**

Our supply chain assurance program was established during the last reporting period and is focused on holding our suppliers to the same standards we apply to ourselves.

Our supply chain assurance program helps us assess and evaluate the likelihood of modern slavery risks within our supply chain and helps inform the procurement process, which includes the group executive leadership team.

We gather information from suppliers to build a Modern Slavery risk profile for them. The supplier's profile is then scored against our risk criteria. This score helps us determine:

- how much more assessment we need to do,
- the level of confidence that the supplier has a solid understanding of Modern Slavery risks
- whether the supplier applies the same standards as we apply to ourselves in relation to human rights.

Reviews and assessments are being integrated into our various procurement streams to ensure that all supply types are assessed during the selection phase. This means, we can make requests relating to Modern Slavery as part of the contract negotiation before we engage with a supplier.

For those suppliers we are already engaged with and for those that we schedule for annual reviews, we consider training and provision of guidance to be our first line of control, where appropriate.

## **COVID-19 CONTEXT**

In 2020, we started to see the impact of COVID-19 across our operations and our supply chain, this continued throughout 2021. Lockdowns and shutdowns, cancellations, workforce reductions and sudden changes to supply chain structures increased the risk of exposure to modern slavery and other forms of exploitation. Particularly:

- loss of income or
- fear of loss of income,
- low awareness of workplace rights,
- requirements to work overtime to cover gaps,
- increased demand due to supply chain shortages or
- inability to safely return to home countries.

We made a conscious decision to actively engage with both our clients and our suppliers to reduce these risks by:

- communicating clearly about worker rights,
- establishing cross referrals to create more job opportunities,
- reviewing partner COVID-19 Safe Plans, and;
- reviewing the adjustments these businesses were making to accommodate their people during the global pandemic

The COVID-19 pandemic called upon businesses like ours, to do more to empower people, whether that meant changing policies and procedures, updating infrastructure and applications to enable work from home or partnering with those who were committed to the same. The majority of our risk assessment activity over the last 12 months was focused on the increased risks associated with the COVID-19 pandemic.

## **Awareness and training**

Awareness is key to reducing modern slavery risks, without awareness people may not know what modern slavery is, how they can identify it and how to report it when its suspected.

Our Code of Conduct, Modern Slavery Statement, Human Rights Statement, Diversity & Inclusions Policy, Environment Policy, Whistleblower Policy and Anti-Discrimination Policy are specifically referenced in our employee handbook. Our people are aware that they can report any signs or suspected signs of modern slavery through our various reporting channels including

- The Whistleblower Hotline
- The Compliance Hotline
- Our internal grievance channels
- Various external bodies





We've launched our modern slavery training course to our workforce and integrated this into our induction training so that all members of our team are aware of and understand the risk that modern slavery can exist within our own operations and within the operations of our supply chain partners.

## Sustainability Committee

Our Sustainability Committee launched in 2021, this committee essentially replaces our Modern Slavery Working Group (MSWG) and expands on the goals already set, with our focus being on the following:

<b>Environment</b>	<b>Conserve and improve our environment</b> <b>Our commitment</b> By 2030, we are carbon neutral throughout our business activities and our entire value chain. To support the longevity of our planet, we are committed to protecting the health of our environment. We will focus on reducing greenhouse gas emissions to address climate change.
<b>Social (Human Rights)</b>	<b>Create opportunities for all</b> <b>Our commitment</b> We employ people facing barriers to the labor market and we actively reduce inequalities in getting a job. Providing 'opportunities for all' is at the core of what we do, and how we can add value to communities. Achieving this is at the core of what we do as a sustainable company.
	<b>Inspire our people and candidates through work</b> <b>Our commitment</b> We want to increase the number of people who are satisfied at work. Being satisfied at work is the foundation of giving your 100 percent every day. It enables our employees to grow as a colleague and as a person. We know better than anyone what job satisfaction is and are going to make sure that everyone can experience it.
	<b>Embrace diversity, equity and inclusion</b> <b>Our commitment</b> We ensure that we are a diverse and inclusive and equally representative of the societies we serve at every level of our organization. Promoting woman in leadership is just the first step, and this cultural shift will lead to more inclusive and equitable hiring and promotion for other under-represented groups.
<b>Governance</b>	<b>Safeguard human rights and dignity for all</b> <b>Our commitment</b> By 2030 we extend our high standards for human rights safeguarding across our entire value chain. Nobody should feel unsafe or unwelcome at work. Everyone's right to live a healthy, happy and prosperous life must be upheld.

## Progress against our goals to date

Goal	Activity
 <i>Maturing our policies and procedures to ensure these have a robust and consistent focus on human rights and Modern Slavery</i>	<ul style="list-style-type: none"> <li>Established cross-business policies and procedures and</li> <li>Created new statements to ensure our commitments to increase awareness and reduce the practice of modern slavery is embedded.</li> </ul>
 <i>Improving and expanding our engagement with our Suppliers and their supply chains with regards to human rights and modern slavery; (Including updates to contracts for supply as these approach renewal).</i>	<ul style="list-style-type: none"> <li>Clearly articulating our expectations with regards to the following:               <ul style="list-style-type: none"> <li>Ethical Conduct</li> <li>Workplace Health and Safety</li> <li>Human Rights</li> <li>Business Resilience</li> <li>Financial Capacity and</li> <li>Quality Management</li> <li>The environment and sustainability</li> </ul> </li> </ul>
 <i>Launching our preferred supplier program</i>	<ul style="list-style-type: none"> <li>Consolidation of our suppliers has taken place over the last 12 months, resulting in a 63% reduction in the number of suppliers we engage with.</li> <li>Our new supplier engagement process has been modified so that a Low Risk Result must be returned for our Modern Slavery Assessment for the arrangement to progress/proceed.</li> </ul>
 <i>Enhancing our training to build greater awareness across our business and our suppliers about the more hidden indicators of modern slavery.</i>	<ul style="list-style-type: none"> <li>New training was rolled out to our entire group of businesses, highlighting what modern slavery is, the factors that contribute to modern slavery, and a focus on those factors that might not be so obvious to others.</li> </ul>



## Measuring Effectiveness

We have incorporated ongoing monitoring into our preferred supplier program to help ensure that our suppliers stay in compliance. The program is updated periodically from internal and external sources and any time a new or emerging risk is identified.

The continuous review program also considers whether the modern slavery risk profile score continues to meet our assurance needs or whether new, control-based activities are required.

Defining KPIs for our program is an ongoing task. We will introduce metrics to analyse the following:

- Adoption of and compliance with our supplier engagement principles
- Compliance to the Modern Slavery commitments made and
- where we can, gauge satisfaction scores from those employed by our suppliers

## Our next steps

To continually improve our approach and our Modern Slavery Framework, we are planning to undertake the following actions in 2022:

- **Performance measures** – Finalising our approach to tracking and measuring our internal programs and the impact these are having throughout our operations and our supply chain.
- **Strengthening supplier engagement** - Continue to refine our risk assessment as appropriate, particularly as new data and new tools become available
- **Internal Policy Review** – to ensure any necessary updates are made
- **Modern Slavery Contract Clauses** – ensure these are embedded in all new engagement contracts, whether these are internal or external templates.
- **Training** – Continue training our people as a way to maintain focus and awareness on Human Rights (including the risks of Modern Slavery)

## Statement of Approval

RGF Staffing APEJ and its subsidiaries, are managed by the same core team comprising of Chief Executive Officer and Chief Financial Officer, who continue to keep the board informed of the reporting requirements and actions taken including our future goals and commitments.



This statement was approved by the Board on behalf of each of RGF Staffing APEJ and each of its related entities on 8<sup>th</sup> February 2022.

Signed,

A handwritten signature in black ink that reads "Peter Acheson". The signature is written in a cursive style with a large initial 'P'.

Peter Acheson, CEO & Director.

**RGF Staffing APEJ**

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