

PROBE GROUP

MODERN SLAVERY STATEMENT

FY20

AT THE HEART OF PROBE'S VALUES ARE PURPOSE, PEOPLE AND PASSION.

With an estimated 40.3 million people in the world living in modern slavery we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure, so far as reasonably possible, modern slavery is not taking place anywhere in our own business or in any of our supply chains.

It is Probe's policy to comply in all respects with the **Modern Slavery Act 2018 (Cth)** which is designed to help organisations combat the serious issue of modern slavery all around the world, including in Australia. The Act establishes a modern slavery reporting requirement and requires large businesses and other entities in Australia to make modern slavery statements on their actions to address modern slavery risks in their operations and supply chains.

Modern slavery covers a range of exploitative practices including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour. The exploitation of workers in Probe's supply chain will not be tolerated.

This is our first Modern Slavery Statement which sets out the steps the Probe Group have

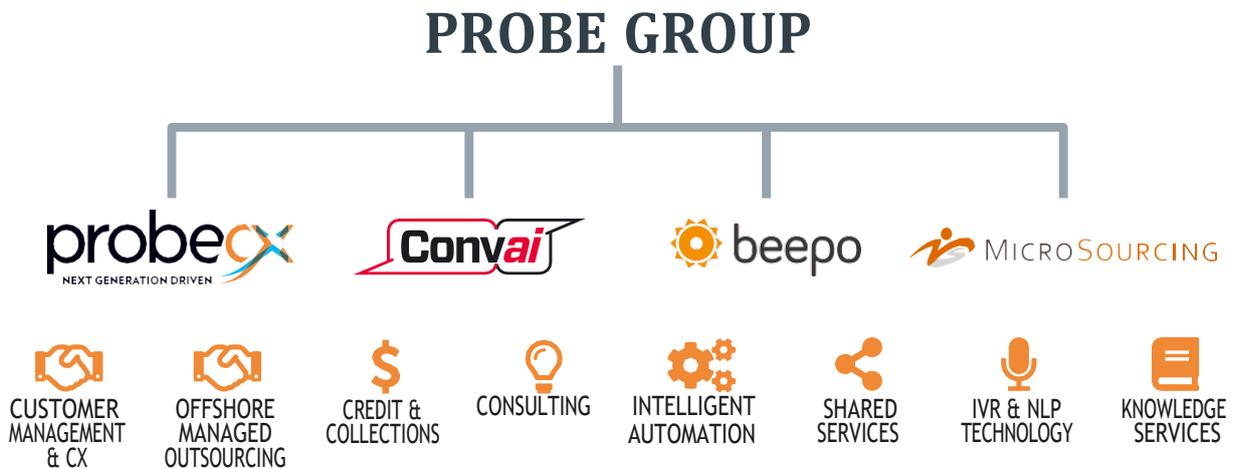
taken to address modern slavery risks in our group supply chain for the financial year ending 30 June 2020 in accordance with the Modern Slavery Act 2018 (Cth) and is made on behalf of Probe BPO Holdings Pty Ltd and its wholly owned subsidiaries including, but not limited to, Probe Contact Solutions Australia Pty Ltd ACN 006 688 955, Probe Operations Pty Ltd ACN 624 615 925, Convai Pty Limited ACN 002 561 515, Beepo Support Services Pty Ltd ACN 167 554 967 and Probe's Microsourcing operations.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under Australian modern slavery legislation. We expect the same high standards from all of the contractors, suppliers and other business partners who do business with us.

OUR BUSINESS AND ORGANISATION STRUCTURE

We are proud to be a global provider of outsourced sales, service and help desk contact centres solutions in the business process outsourcing sector delivering a broad range of leading customer contact and end to end credit management and collections solutions to our valued clients.

Like most businesses we try to make it easy for prospective customers to buy our services and so we package them.



In preparing this statement we have acted collaboratively and in consultation with wholly owned subsidiaries of Probe BPO Holdings Pty Ltd with whom we make this joint statement by virtue of our Modern Slavery working group and consistent due diligence processes throughout our group established by our In-house Legal and Compliance team. As the entities within the Probe Group use similar policies and processes and operate in the same sector with many shared suppliers, we will provide a consolidated description of the actions our Group are taking to address modern slavery risks.

Our business is organised into 7 business units:

- Contact Solutions
- Operations
- Field Services
- Collections
- Convai
- Microsourcing
- Beepo

Our head office is based in Melbourne, Victoria. The Probe Group has over 7000 employees and we deliver services in Australia, New Zealand and the Philippines.

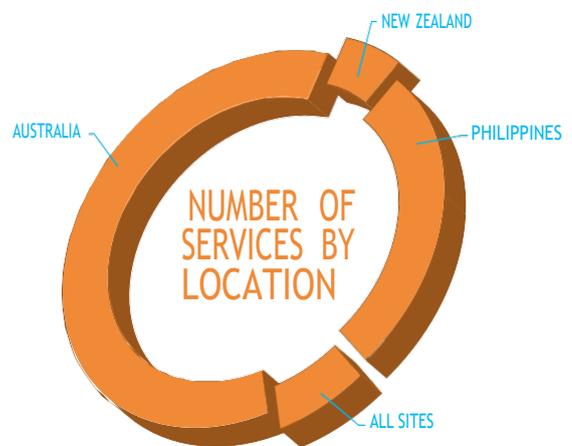
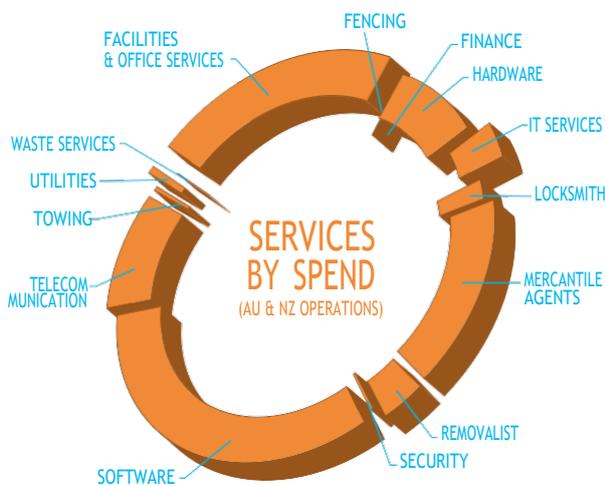
At Probe, we have a NEXT GEN BPO culture which seeks to attract and retain reliable, respectful and ethical employees. Our people are central to achieving our vision of being the most sought after and respected Customer Management (BPO) services provider in the markets within which we choose to operate. Probe is committed to ensuring its people work under conditions that comply with all national, local and international labour standards and laws and codes of the countries in which it operates including, but not limited to, the ETI Base Code.

OUR SUPPLY CHAINS

In FY20, the Probe Group worked with over 700 suppliers with the majority of our supplier spend occurring with information technology and office services.

Due to the nature of our operations we have a relatively simple supply chain which includes goods or services needed for our day to day operations including office supplies,

office services (including postal, cleaning, fire protection, security, waste disposal and maintenance services etc), leasing of facilities, IT infrastructure and software, office equipment, telecommunications and utility services and professional services (including external auditing and legal services, transport, locksmith, recruitment and consulting services).



OUR POLICIES ON SLAVERY

We are committed to ensuring, so far as reasonably possible, that there is no modern slavery in our supply chains or in any part of our business. Probe’s commitment to anti-slavery is reflected in various corporate policies which seek to prevent dishonest or unethical conduct and fostering a culture of honesty and accountability including the following:

- Recruitment Policy
- Corporate Social Responsibility Policy
- Procurement Policy
- Whistleblower Policy

We are in the process of preparing a stand alone Anti-slavery Policy which 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 is not taking place anywhere in our supply chains.

This commitment is also reflected in our Supplier Code of Conduct. We require all Suppliers to act in a manner consistent with our XTRA philosophy including with xtra value, xtra performance and xtra integrity.

DUE DILIGENCE PROCESSES FOR ETHICAL SUPPLY AND ANTI-SLAVERY

Probe is committed to implementing and maintaining standards of good governance where we undertake our business activities in an ethical and transparent manner consistent with applicable laws. This extends to the Suppliers with whom we do business.

We have in place systems to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery occurring in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistleblowers.

As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain, we undertake a risk assessment of suppliers to identify and understand our modern slavery risks. As part of our supply chain risk analysis we seek to identify:

- suppliers and partners located in high risk countries where labour rights are not protected;

- suppliers and partners who we spend the most with in our supply chain;
- high-risk industries that have previously been affected by undeclared labour, illegal labour and/or a high incidence of trafficked persons;
- where there is temporary labour;
- where there are sub-contractors or temporary agency staff.

A risk rating is then attached of low, medium or high risk for each supplier/partner based on publicly available information about indicators of modern slavery.

In keeping with our standards of transparency and ethical conduct, we actively encourage everyone in our business to challenge any behaviour they believe is inconsistent with any of our values or our policies. The Probe Group also has mechanisms in place for employees or third parties to anonymously report suspected or actual improper conduct through our Whistleblower Policy. Protected disclosures can be made through internal reporting processes or via the Probe Group stopline service.

SUPPLIER ADHERENCE TO OUR VALUES

To ensure all those in our supply chain and contractors comply with our ethics we have established a Supplier Code of Conduct which details the standards expected of our Suppliers and their supply chains, when providing goods and services to or on behalf of the Probe and applies to any third party providing products or services to or on behalf of Probe. Our Supplier Code of Conduct is published on our website and is an important part of our approach to ethical and responsible procurement.

It is the expectation that all Suppliers act honestly, fairly and without prejudice in all business dealings, avoiding conflicts of interest

and acting with integrity. Suppliers whether directly or through their supply chain, must comply with all applicable modern slavery laws, including not engaging in human trafficking, slavery, servitude, forced labour, debt bondage and child labour as noted above. Human rights abuses are not permitted in any form in our supply chain. Suppliers must have adequate processes in place to ensure that their supply chain comply with applicable laws relating to minimum wages, child labour and modern slavery including complying with any associated mandatory reporting requirements.

TRAINING

To promote employee awareness all employees who are involved in procuring goods and services are required to complete Probe's Modern Slavery compliance training module.

Probe's training and awareness program seeks to ensure that team members involved in sourcing goods and services have an understanding of what is modern slavery and how to spot risks and report incidents.

Training is a fundamental part of Probe's efforts to raise awareness and to implement anti-slavery and corporate social responsibility policies effectively.

OUR FY19 ACHIEVEMENTS

We are proud of the steps we have taken to combat modern slavery within our operations. Measures we have implemented in FY19 include:



OUR EFFECTIVENESS IN COMBATTING SLAVERY

We anticipate that due to our global operations our purchase of goods and services may be susceptible to risks of modern slavery particularly the procurement of computer hardware from offshore locations. Probe Group manage risks to our organisation by maintaining consistent risk mitigation processes to monitor for and avoid modern slavery in all environments in which we operate in. This includes undertaking due diligence on existing and potential suppliers and ensuring we have a robust training framework in place.

The effectiveness of efforts to minimise the risk of modern slavery will be regularly assessed and reviewed by our Ethical Supply and Modern Slavery Committee who meet on a quarterly basis. Our Committee will use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery is not taking place in any part of our business or supply chains.

ETHICAL SUPPLY AND MODERN SLAVERY COMMITTEE KPIs FY21

100% of suppliers to be assessed for modern slavery risks

100 % of modern slavery training completion for employees involved directly in supply chains and procurement

At least 3 Ethical Supply and Anti-Slavery Committee meetings to be scheduled before 30 June 2021

All 6 FY20 modern slavery initiatives to be implemented on or before 30 June 2021

PROBE GROUP GOALS TO FY21

Following a review of the effectiveness of the steps we have taken this year to minimise the risk of slavery in our operations and supply chains we have committed to taking the following further steps to combat slavery in our supply chain in FY21:



TO HAVE ASSESSED ALL NEW AND RECONTRACTED SUPPLIERS



TO ENSURE 100% COMPLETION OF MODERN SLAVERY TRAINING FOR NOMINATED TEAM MEMBERS



TO HAVE MEDIUM AND HIGH RISK SUPPLIERS COMPLETE OUR MODERN SLAVERY DUE DILIGENCE QUESTIONNAIRE



TO PUBLISH OUR ANTI-SLAVERY POLICY



REVIEWING THE MOST EFFECTIVE WAY TO MEASURE EFFECTIVENESS OF OUR ANTI-SLAVERY PROGRAM



ESTABLISH ETHICAL SUPPLY AND ANTI-SLAVERY COMMITTEE

The effectiveness of our program will be measured in FY21 based on implementation of the above initiatives.

Consistent with our “we do it better” approach we are committed to continuously review the initiatives we have implemented as a group to minimise the risk of modern slavery within our supply chain.

This modern slavery statement is made by Probe BPO Holdings Pty Ltd and its wholly owned subsidiaries and was approved by the Probe Group Board of Directors on 27th January 2021

Andrew Hume, Chief Executive Officer

Probe BPO Holdings Pty Ltd

27th January 2021