



**2023**

**MODERN SLAVERY  
STATEMENT**



**WORKING TOGETHER TO REALISE**

***DIGITALLY-ENABLED CX***

**At Probe Group we are committed to ethical conduct and improving our practices to combat slavery in accordance with the Modern Slavery Act 2018 (Cth) and to implementing effective processes to ensure, so far as reasonably possible, that modern slavery is not taking place in our business or operations and in any of our supply chains. Probe Group firmly believes that every individual, regardless of their role, nationality or location deserves to be treated with dignity, respect and fairness.**

This is our fourth joint Modern Slavery Statement which sets out the steps Probe Group have taken to address modern slavery risks in our business for the financial year ending 30 June 2023 in accordance with the Modern Slavery Act 2018 (Cth) and is prepared on behalf of Probe BPO 1 Pty Ltd and in consultation with 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, Probe Asia Pacific Pty Ltd 86 082 618 148, Innovior Pty Ltd ACN 619 169 881, Convai Pty Limited ACN 002 561 515, Convai New Zealand Limited, Probe Contact Solutions New Zealand Limited, Beepo Support Services Pty Ltd ACN 167 554 967, Beepo Inc, Probe Group's Microsourcing operations including:

Microsourcing International Ltd, Probe Contact Philippines Inc, Probe Group Philippines Inc and Probe North America LLC. For the purposes of this joint statement, Probe, Probe CX or Probe Group refers to all reporting entities.

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 digitally enabled customer service solutions. Using human-led technology, we help organisations transform their digital capabilities to remain relevant to their customers in an ever changing world. From workforce management and people and culture, to intelligent automation, outsourced services, end to end credit management and collections solutions; our focus is on creating environments for digitally-enabled CX to thrive.

Our tech-enabled, empowered and engaged workforce delivers global customer contact solutions servicing 21 countries, seamlessly and reliably. Over 40+ years, the combination of people and technology has driven us to deliver best-in-class contact centre environments, leading the way when it comes to customer experience, results, continuous improvement, innovation and insights.



## MANAGED & OUTSOURCED SERVICES

-  Contact Centre Operations
-  Digital Operations
-  Knowledge Services
-  Shared Services

## TECHNOLOGY & TRANSFORMATION SERVICES

-  CX & Operations Strategy
-  Digital Services
-  Intelligent Automation
-  Technology Services
-  Data & AI

In preparing this statement we have acted collaboratively and in consultation with wholly owned subsidiaries of Probe BPO 1 Pty Ltd with whom we make this joint statement by virtue of our Ethical Supply and Anti-Slavery Committee and consistent due diligence processes throughout our group established by our in-house Legal and Compliance team. As the entities within 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 head office is based in Melbourne, Victoria. Probe Group has close to 19,000 employees and we deliver services in Australia, New Zealand, the Philippines, the United States and India.

At Probe Group, we have a culture that seeks to attract and retain reliable, respectful and ethical employees. Our people are central to achieving our goal of delivering digitally-enabled CX. Probe Group 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.

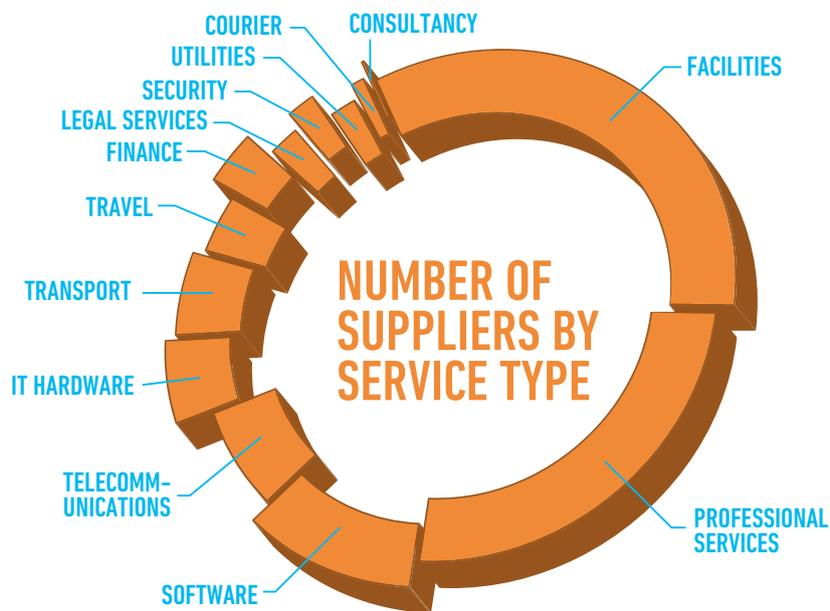
### Our business is organised into eight business units:

- Digital Solutions
- Contact Solutions
- Field Services
- Collections
- Convai
- Microsourcing
- Beepo
- Innovior

# OUR SUPPLY CHAINS

Probe Group’s supply chain is a vital component of our operations comprising approximately 750+ suppliers spanning various sectors. 75% of our suppliers are within facilities (including office supplies and services), professional services and IT. These figures reflect the importance of our suppliers to our overall business success. We recognise the significance of these relationships in achieving our organisational objectives and consequently, we require our suppliers to adhere to standards of ethical conduct and responsible business practices as outlined in our Supplier Code of Conduct.

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



## KEY SUPPLIER SOURCE LOCATIONS



# OUR POLICIES ON SLAVERY

At Probe Group, we are steadfast in our commitment to ethical business practices and human rights. We are committed to ensuring, so far as reasonably possible, that there is no modern slavery in our operations, as well as our supply chains or in any part of our business. Probe Group's commitment to anti-slavery is reflected in various corporate policies which seek to prevent dishonest or unethical conduct and foster a culture of honesty and accountability including the following:

- Code of Ethics and Conduct
- Anti-Slavery Policy
- Recruitment Policy
- Corporate Social Responsibility Policy
- Procurement and Third Party Management Policy
- Whistleblower Policy

By adhering to these policies, we strive to contribute to the eradication of modern slavery and uphold the principles of fairness, integrity, and respect for human dignity.

Our Anti-slavery Policy also 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 which we have established to outline our expectations for ethical behaviour, including strict prohibitions on modern slavery practices. This code serves as a blueprint for setting clear guidelines for our suppliers to adhere to and reinforces our zero-tolerance approach towards any form of modern slavery.

## MODERN SLAVERY RISKS

Probe Group is committed to human rights and understands the important role our business plays in contributing towards the global elimination of modern slavery and human trafficking.

Probe Group procures a range of goods and services both from Australia and internationally. Probe Group conducted a risk assessment of modern slavery taking into account supplier geographical location and known industry risks. Our risk assessment processes are designed to identify and evaluate potential areas of vulnerability within our supply chain. This includes thorough scrutiny of high-risk sectors, such as computer hardware manufacture and cleaning services.

We anticipate that due to our global operations, our purchase of goods and services may potentially be susceptible to risks of modern slavery and that specific sectors pose heightened risks for modern slavery, notably within the purchase of computer hardware manufacturing and cleaning services. In computer hardware manufacture, the complexity of global supply chains can sometimes obscure the origins and conditions of labour. Through diligent monitoring and proactive engagement with stakeholders we seek to minimise the risk of modern slavery in these critical areas.

During this reporting period, we conducted various assessments across our operations and supply chains and we are pleased to report that no instances of modern slavery were identified.

Probe Group manages risks to our organisation by maintaining consistent risk mitigation processes to monitor for and avoid modern slavery in all environments in which we operate. This includes undertaking due diligence on existing and potential suppliers, conducting thorough risk assessments, ensuring we have a robust training framework in place, and collaborating with stakeholders to discuss statutory updates, current compliance focus/initiatives and new modern slavery risks identified, if there are any.

Where practicable, we seek to insert express terms in our supplier contracts requiring adherence to anti-modern slavery measures.

## DUE DILIGENCE PROCESSES FOR ETHICAL SUPPLY AND ANTI-SLAVERY

Probe Group's due diligence framework seeks to minimise the risk of modern slavery in our operations and supply chain. We have in place systems to:



**Identify and map our supply chain**



**Assess and monitor potential risk areas in our supply chains**



**Mitigate the risk of slavery occurring in our supply chains**



**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 areas within our supply chain that may be susceptible to modern slavery practices. This includes thorough scrutiny of sectors with high-risk profiles or high-risk locations. Through this assessment we gain a good understanding of the potential vulnerabilities and implement targeted measures to mitigate risk. 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 within 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. To date, our focus in our supply chain mapping and risk assessment has been on direct suppliers.

Probe Group is committed to the highest standards of integrity and promoting a culture of honest and ethical behaviour, corporate compliance and good corporate governance. Probe Group's Whistleblower Policy, which is published on our website, serves as a vital pillar in our modern slavery compliance framework. It provides a secure avenue for employees and stakeholders to report any suspicions or evidence of modern slavery within our operations or supply chain. This policy ensures confidentiality, protection against retaliation and timely investigation of reported concerns. By empowering individuals to come forward, we strengthen our ability to identify and address potential risks, promptly reinforcing our commitment to transparency, accountability and the eradication of modern slavery in all its forms. This proactive approach illustrates our dedication to a culture of integrity and ethical conduct at every level of our organisation. Protected disclosures can be made through internal reporting processes or via the Probe Group stopline service.

## SUPPLIER ADHERENCE TO OUR VALUES

At Probe Group, we view our suppliers as integral partners in upholding shared principles of integrity and ethical conduct. Probe Group expects all suppliers whether directly or through their supply chain, to 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. 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.

To ensure our suppliers 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 Probe Group and applies to any third party providing products or services to or on behalf of Probe Group. Our Supplier Code of Conduct was reviewed this year to ensure it continues to remain relevant to the standards expected of Probe Group suppliers. The Supplier Code of Conduct is published on our Probe Group website and is an important part of our approach to ethical and responsible procurement.

We believe that by cultivating a strong network of suppliers who share our values, we not only enhance the quality and reliability of our supply chain but also contribute to a global business community that prioritises ethical conduct and social responsibility.



## IMPACT OF COVID-19

In light of the unprecedented challenges presented by the COVID-19 pandemic over the past few years, Probe Group recognises the profound impact it has had on global supply chains and business operations. Throughout this period, we have proactively assessed and responded to the specific risks posed by the pandemic, including those related to modern slavery. We have undertaken a comprehensive risk assessment, identifying potential vulnerabilities and implementing adaptive measures to address these challenges. During this reporting period COVID-19 has not had a material impact on our operations or supply chain.

We have a number of employees working remotely and under hybrid working arrangements. This has assisted in minimising the impact of COVID-19 enabling us to provide continuity of services to Probe Group clients.

Our partnership with Sonder is still in place, an innovative wellbeing and safety organisation to provide free and confidential support and guidance for employees who need assistance to support mental health, wellbeing and physical safety with human help every second of every day, whenever and wherever it's needed.

Moreover, we have been mindful of the impact of COVID-19 on our suppliers and their workforce, particularly disrupted traditional supply chain models, leading to increased uncertainties and complexities. We have endeavoured to ensure where possible we didn't terminate any supply contracts due to the impact of COVID-19. Maintaining supplier relationships has always been a key focus for Probe Group. This includes maintaining open communication with suppliers, leveraging technology for remote monitoring, and adapting due diligence processes to the evolving risk landscape.



## TRAINING

Training is a crucial cornerstone of Probe Group's anti-slavery framework. It empowers our employees with the knowledge and tools necessary to recognise, prevent and report instances of modern slavery. Through targeted education we raise awareness about the signs, risks and consequences of modern slavery, fostering a vigilant and informed workforce.

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

Probe Group'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.

# OUR ACTIONS AND ACHIEVEMENTS

We are proud of the steps we have taken to combat modern slavery within our operations. Measures we have implemented and continuously improved in FY23 include:



Our Anti-Slavery Policy has been reviewed and published for this year. We engage stakeholders, including leaders from various business units within our group to gather valuable insights and ensure a diversity of perspectives.



Introduced standard supplier terms in supplier contracts which include an express reference to modern slavery. This approach ensures clarity, consistency, and efficiency in managing relationships with suppliers.



We conducted our annual review of Supplier Code of Conduct to ensure its relevance and alignment with trends in modern slavery issues involving a comprehensive and proactive approach.



Improved our Third Party Vendor and Partners Management Process, including modern slavery risk assessment, to foster stronger relationships, enhancing efficiency and mitigating risks within the supply chain. This initiative focuses on streamlining communication channels and defining clear roles and responsibilities of the relevant stakeholders ensuring a resilient and optimised vendor management process that aligns with our organisational goals and values.



We have invested in a centralised group risk compliance tool called 6clicks that will enable us to efficiently send out and track supplier modern slavery questionnaires. The platform not only ensures standardised and timely distribution of questionnaires but also facilitates real-time tracking, data analysis, and reporting.



This year we continued to regularly monitor the Supply Chain register and undertake ad hoc quarterly audits in collaboration with finance to ensure the register is up to date. Regularly assessing the register allows us to identify areas where processes can be improved, ethical standards can be strengthened, and relationships can be optimised.



Training and awareness has been an important pillar in our modern slavery due diligence. We have successfully developed the awareness and knowledge of our employees who are engaged in the procurement of goods and services to ensure that their decisions and actions align with Probe Group's commitment to respect human rights.



We have implemented the policy of the month initiative as communication to our employees, aiming to enhance awareness and understanding of crucial policies that govern our operations. Probe Group's Whistleblower Policy was highlighted as it serves as a vital mechanism for employees and stakeholders to confidentially and safely report any suspicions, concerns, or evidence related to modern slavery within our operations or supply chain. This policy not only safeguards the well-being of whistleblowers but also reinforces our organisational commitment to maintaining the highest standards of integrity and ethical conduct.



## EFFECTIVENESS IN COMBATTING SLAVERY

We are committed to continuous improvement and looking at how we can improve our modern slavery framework. We are tracking the effectiveness of our actions through our Anti-Slavery and Ethical Supply Committee. The committee is responsible for, amongst other things, tracking and reviewing our progress on the implementation of modern slavery initiatives and achievement of anti-slavery goals.

We continue to focus on training completion and evaluating the best options for measuring the effectiveness of our modern slavery initiatives and actions. The following key performance indicators were achieved:

- 100% of suppliers being assessed for modern slavery risk
- Monitoring and ensuring supplier completion of Probe Group supplier modern slavery questionnaires, if applicable
- Review and update of our Procurement and Third Party Management Policy including the introduction of supplier standard terms which expressly cover modern slavery
- Continuation of leadership participation in modern slavery initiatives, specifically Probe Group's Ethical Supply and Anti-Slavery Committee
- Review and update of our Supplier Code of Conduct to ensure the Code remains relevant and up to date whilst considering any trends in modern slavery issues and the risks posed to Probe Group.

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 meets on a regular basis. One of our core key performance indicators for FY24 remains to promote awareness with our suppliers of modern slavery risks.

# EFFECTIVENESS IN COMBATTING SLAVERY

AREA	ITEM	MEASUREMENT OR EFFECTIVENESS
<b>Awareness</b>	Ensuring modern slavery awareness training is provided for all staff engaged in procuring goods or services to raise awareness and to implement Probe Group's anti-slavery policies effectively.	Number of relevant staff who have received training on modern slavery risks.
<b>Policies</b>	Ensuring applicable Probe Group policies confirm Probe Group expectations in regards to preventing modern slavery in Probe Group's operations and supply chains.	Policies are reviewed annually to identify any opportunities for improvement. Supplier access to Probe Group policies related to modern slavery.
<b>Supply Chain Register and Due Diligence</b>	Monitoring of supply chain with maintenance of Probe Group supplier register.	Percentage of suppliers who have been assessed for modern slavery risks. Completion of modern slavery questionnaires where identified as required from modern slavery risk rating.
<b>Risk Management</b>	Understanding exposure both within Probe Group operations and externally in our supply chain.	Completion of annual risk assessment.
<b>Commitment</b>	Establishing the Anti-Slavery and Ethical Supply Committee	Anti-Slavery and Ethical Supply Chain Committee to monitor progress against our action plan, collaborate and discuss current trends or issues and also a platform to discuss future plans and initiatives.
<b>Internal Reporting</b>	Reporting of our progress to our group's leadership team.	Updates to be provided to our group's leadership team.

# PROBE GROUP GOALS TO FY24

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 FY24 and build upon the work completed in 2023:



Continue to audit high-risk suppliers to verify compliance with anti-modern slavery measures and Probe's Supplier Code of Conduct, annually.



Increase supplier engagement through targeted communication, for small suppliers by distributing Modern Slavery information sheet/infographic for small suppliers and how modern slavery might affect their businesses to ensure a shared commitment to ethical practices and modern slavery prevention.



Promote our Whistleblower Policy to our suppliers at appropriate opportunities and encourage their adoption of similar measures within their organisations.



Continuing to educate our people on modern slavery risk management as we implement new systems and processes.



Conduct an annual review of all modern slavery and ethical-related policies, procedures, and initiatives ensuring they remain up-to-date, aligned with best practices, and responsive to emerging trends and challenges.



Review standard supplier terms.

The effectiveness of our program will be measured in FY24 based on the implementation of the above initiatives.

We are committed to continuously reviewing the initiatives we have implemented as a group to minimise the risk of modern slavery within our supply chain.

This joint modern slavery statement is made by Probe BPO 1 Pty Ltd and its wholly owned subsidiaries and was approved by the Board of Directors.

**Robert James Easton**

CEO

**Probe BPO 1 Pty Ltd**

22 December 2023