



# Modern Slavery Statement

2025

# AKG Australia Country Lead Message

AKG Group's purpose is to empower the people and communities we work with every day. As an organisation we are committed to the elimination of modern slavery in all its forms.

This is AKG Group's third Modern Slavery Statement (the Statement) and based on our analysis and reflection over the last 12 months, we have identified key areas where we have made further improvements and enhancements to our anti-modern slavery framework. These areas are fundamental to our organisation's development as we continue to build upon and strengthen our commitment to addressing and mitigating modern slavery exposure.

In the past 12 months, we have:

- Implemented improved Governance frameworks to ensure that we are able to improve our identification and responsiveness to modern slavery risks in a streamlined manner;
- Reviewed and standardised our front-facing supplier documents to ensure that it addresses modern slavery risks across the entire supply chain;
- Commenced a comprehensive review of our operations and corporate policies;
- Commenced the process of consolidating policies, systems and structures to ensure a consistent approach to modern slavery across AKG Group.

The above will form the basis for further progress in FY26.

I am pleased to present this Statement which was approved by the AKG Board on 5 December 2025.



**Darren Hooper, AKG Australia Country Lead**



## Key Developments in FY25

- Implemented a Learning Management Solution (LMS) to provide training to our staff on understanding and identifying the risks of modern slavery in our business.
- Reviewing operational policies and identifying changes to further enhance compliance with AKG Group’s intention to identify and eliminate modern slavery from our supply chains.
- Implemented a formal Modern Slavery Register.
- Streamlined our Governance framework.

## Priorities for FY26

- Rolling out the new modern slavery training to employees across AKG Group.
- Consolidating our operational policies post-Acquisition.
- Conducting a targeted enhanced, review of supplies operating within higher- risk industries.
- Developing a Supplier Code of Conduct.

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# 1. Introduction

AngusKnight Pty Limited ACN 076 749 605 (AKG) is a private company registered in Australia and its Australian-incorporated subsidiaries are named in Attachment A (AKG Group).

This Statement is made in accordance with the Australian *Modern Slavery Act 2018* (MSA). It also recognises and accords with similar requirements within our internal operations, including: UK *Modern Slavery Act, 2015*, Canada – *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023*, Singapore – *Prevention of Human Trafficking Act 2014* and guidelines within the European Union – *On due diligence for EU businesses to address the risk of forced labour in their operations and supply chains*, applying to our operations in Sweden and Italy.

This Statement is made by AKG and all of its controlled entities in Australia.

This Statement was approved by the principal governing body of AKG as the higher entity of AKG Group and is signed by a responsible member of AKG in accordance with the MSA.

We recognise that modern slavery can exist in many forms through coercion, threats, or deception in order to exploit individuals and deprive them of their human rights and freedoms. This can include slavery, servitude, human trafficking, child labour, debt bondage and forced labour practices.

This is AKG's third Australian Modern Slavery Statement which recognises our continued commitment to identifying and removing modern slavery from our operations and supply chain activities. It provides a commitment to continuous improvement, enhancing our risk management approach and sets out our approach and actions to manage modern slavery risks in our group operations and supply chains through 2026.

In previous years, formal governance processes were established to assess, review and enhance our management of modern slavery risks. Our previous Modern Slavery Statement noted the development of our Modern Slavery Working Group. Following the establishment of AKG's Financial, Audit and Risk Committee (Risk Committee), oversight of any modern slavery risks now fall under the Risk Committee's remit.

Our 2024/25 Action Plan aimed to build upon and further develop our effective governance framework, understand risks associated with existing supply chains, and further develop a program of actions and staff training. Following the Acquisition, we decided to re-shift our plan to undertake a full-scale review of our governance framework and all internal operational and supply policies.

No modern slavery violations were detected and/or reported to AKG in FY25.



## 2. About AKG

AKG Group is a group of companies controlled by AKG working together to empower individuals, organisations and communities through innovative employment, training, and community solutions. AKG Group operates in more than 300 locations in Australia, Canada, Italy, Singapore, Sweden, Korea, and the UK servicing diverse markets across the government, corporate, First Nations and community sectors. AKG Group combines customer-focused insights with productivity prowess to empower clients to meet their full potential.

Co-founded in 1991 by Duncan Angus, AKG Group is 100% Australian-owned and has helped more than one million people realise their potential over the past three decades.

In November 2024, AKG completed an acquisition of entities in Australia and Korea (the Acquisition), expanding its operations across both regions. The Acquisition resulted in an increase of over 1,200 new employees allowing AKG to continue delivering high quality services across its core service areas.

Our partnership business model sets us apart. AKG is the holding company for a group of businesses which employ directly, or through partnerships, approximately 2,500 people. Our family of companies is made up of international, national and local organisations (including an Indigenous not-for-profit) working collaboratively to create social impact locally and at scale.

Working with grassroots organisations embeds us in the communities we serve, so we can understand and respond to local labour market challenges and work as allies with the public and employers.

### **AKG Group operates in 5 core service areas:**

#### **Employment**

Working across the globe with unemployed people to find them long-term, meaningful jobs, through programs delivered on behalf of the Australian, UK, Canadian, Italian, Singaporean, Korean and Swedish governments. We specialise in helping people who have experienced disadvantage, the long-term unemployed, people living with a disability, Indigenous peoples, people from culturally and linguistically diverse backgrounds, refugees, ex-offenders, parents, the young and mature-aged people. We also work with employers to provide bespoke no-cost recruitment strategies to find, recruit, on-board and support diverse employees.

## Communities

We run responsive programs to develop employment pathways, local business enterprises and community infrastructure. AKG Group operates in more than 300 communities across Australia, Canada, Italy, Singapore, Sweden, Korea and the UK. We tailor our programs to suit local needs, whether for First Nations people, addressing the impacts of mental health and wellbeing, or outreach programs for young people.

## Education and Training

Providing people with the appropriate skills, including vocational and non-vocational courses. AKG operates three Registered Training Organisations and understands the importance of targeted skills development to get and hold a job, and the capacity to provide integrated education and training is a vital component of our partnership model.

## Wellbeing & Health

AKG Group's allied health services include psychological, physiological and assessment services through AKG Health in the UK and Australia, and the Healthy Workplace Ecosystem and School Health programmes in Singapore. Health, lifestyle, and personal issues can make a big impact on people's capacity to find work. We help by addressing the physical, mental, and social barriers to employment goals.

## Workplace Medical Services

AKG provides workplace medical services aimed at preventing and reducing the impact of injury and illness in workplaces and the community. We work with large national organisations across a range of industries and have the largest network of GP clinics in Australia, combining local knowledge and connection with group best practice to deliver high quality services to underserved populations.

# 3. Risks of Modern Slavery

AKG has a long-established Governance and Compliance function which reports independently to the AKG Board. It actively considers and reviews risks across its operations and supply chains and will provide that overall compliance and monitoring of risks in relation to modern slavery. It is previously supported in this work through the Modern Slavery Working Group. This Working Group and its functions has now been fully incorporated into the Risk Committee in an effort to streamline the process and ensure full oversight.

As reported in our second Modern Slavery Statement, we focused our analysis of modern slavery risks on key areas listed below. We consider these risk assessments to be valid and applicable in FY25:

**Sector risks** – we operate within the local services sector and do not manufacture or sell products. We consider our operational risks in this area to be low.

**Recruitment and hiring practices** – we have highly structured human resources recruitment practices within all our operations and operate within regulated labour award conditions of employment. This is considered to represent a low risk.

**Products and services** – nearly all of our procurement is sourced through local suppliers. We have examined our purchase of goods and services in those areas which have been highlighted as higher risks by Australian Border Force (cleaning, hospitality, agriculture, textiles production and some types of manufacturing) and do not consider our limited purchases in these areas to be representative of high risk factors such as using migrant and seasonal labour. Where these industries are relevant, we apply additional focus to these suppliers.

**Geographic risks** – we operate in countries which generally have strong and regulated labour markets which have robust modern slavery conditions. We have recognised that some of our technology procurement is manufactured in countries which have a more elevated risk in downstream supply chains.

Our previous risk analysis identified several areas of risk and improvement in our operations and supply chain management. These risks are continuing to be evaluated and addressed, including:

- Visibility of modern slavery risks within our procurement analysis, policy and supply chain vetting and assessment processes.
- Establishment of effective governance and consultation processes.
- Implementation of the LMS to improve staff education and awareness practices on how to recognise and highlight modern slavery practices.
- Reviewing our service delivery operational practices to ensure client safeguards are comprehensive in our post placement support, employer agreements and risk assessments, together with client feedback and reporting mechanisms.
- Improvements required in our due diligence approaches, ensuring we understand our supply chain operations, especially where these have a higher level of downstream supply chain risks.
- Continuing to engage in consultation across the AKG Group with respect to modern slavery approaches and prevention.



## 4. Mitigations and Actions

In the FY25 reporting period, AKG has continued to mature its processes to improve the management of modern slavery risks. We have established effective governance and consultation processes and continued to improve our policy and practices within our operations and supply chains management.

We have not identified any instances which require remediation. If any matter were to arise, remediation action would be considered on a case-by-case basis by the Risk Committee.



### Governance

As stated above, all modern slavery related issues are addressed by our Risk Committee, which provides oversight on these matters. The Risk Committee, supported by AKG's Executive General Manager – Government Relations, Quality & Risk, monitors the day-to-day implementation of our modern slavery framework and associated risk mitigation measures, as well as the ongoing reporting and review of its implementation. This structure ensures that the Board is kept informed and up-to-date at all times.

#### Key actions in the FY25 reporting period included:

- An audit, review and consolidation of AKG's core governance policies, including:
  - Quality Assurance Framework
  - Fraud Control Policy and Plan
- Devising a multi-year action plan for the continued enhancement of our anti-modern slavery policies and procedures.



### Operations

The level of risk within our service operations is considered low. However, we have recognised that our operational policies, practices, and client resources have a low level of visibility. AKG's Australian operations team has commenced the process of undertaking a comprehensive review and enhancing the effectiveness of identifying potential modern slavery risks by updating our Australian policies and practices accordingly. We expect this review to be finalised by FY26. This will thereafter be incorporated into our annual refresher training on the LMS.

### **Key actions in the FY25 reporting period included:**

- Review of the following Australian operational policies, including recommendations enhancing those policies:
  - Whistleblower Policy
  - Business Expenses and Corporate Card Policy
  - Our People Policy
  - Code of Conduct
  - Fraud Control Policy and Plan
- Business Recovery and Continuity Plan
  - Procurement Policy (already included MS)

### **Actions for FY26 include:**

- Standardising modern slavery practices arising from the Acquisition, including ensuring that modern slavery reporting and feedback is consistent.
- Refine internal and external incident management process.
- Review of employer vetting, assessment, and agreements noting that Commonwealth agreements are used in many cases for wage subsidies and some employer and community services program agreements.
- Incorporate changes to supply chain and procurement practices within our devolved procurement operations.
- Rolling out consolidated policies and procedures across AKG Group and ensuring that current and new staff are appropriately trained.



## **Supply Chain**

As previously identified, our Supply Chain represents the highest level of risk within our operations. AKG Group has a supply chain profile of over 2800 suppliers, with a high percentage of expenditure concentrated within the top 3% of suppliers. Supply chain modern slavery risks are difficult to identify and, in many cases, have complex and highly distributed international supply chains.

### **Key actions include:**

- During the FY25 reporting period, we conducted further modern slavery risk assessment of our current suppliers through a questionnaire and review of their agreements. This assessment examines supplier modern slavery practices (i.e. existence of Modern Slavery Statement), the nature of the goods and services provided and the level of their supply

chain complexity. No instances of modern slavery were identified as part of this review. We undertake a risk assessment of each supplier on an annual basis.

- Reviewed and standardised front-facing supplier agreements to address modern slavery risks in the supply chain.

**Actions for FY26 include:**

- Developing a Supplier Code of Conduct to govern the engagement with AKG Group’s key suppliers.
- Developing a new system as part of the internal online supplier registration to more easily identify key suppliers as they are initially onboarded.
- Ongoing communication to supply chain and contractors on any updated modern slavery terms and conditions.
- Continuing to prioritise the monitoring of modern slavery, human trafficking, child labour and other forced labour practices.
- Conduct enhanced review of all major supply agreements relating to:
  - information technology supplier agreements where technology products are manufactured in higher risk countries;
  - cleaning supplier agreement where those suppliers use contractors and may engage with immigrants; and
  - uniform supplier agreements (textiles), where those suppliers are located outside of Australia.



## Staff Awareness and Education

We remain committed to improving the level of understanding the risks of modern slavery within our business and to improving our effectiveness in monitoring and risk management across our operations.

**Key actions include:**

- Implemented a new content LMS incorporating all of our existing modern slavery training modules to streamline and simplify our staff training programs.
- Updated policies and procedures uploaded to AKG Intranet.

**Actions for FY26 include:**

- Refresher training for all staff for newly redeveloped policies and procedures.
- To achieve good compliance rates with employees undertaking the staff training programs.
- Required training for current and new staff that can be undertaken through the LMS.

# 5. Ongoing Effectiveness Measures

Managing modern slavery risks is an ongoing strategy which requires discipline and vigilance. We will continue to engage in an ongoing review of our approach and to ensure we have well established reporting processes in place which is a key outcome from this Statement.

The Executive General Manager – Government Relations, Quality & Risk is the assigned executive who will coordinate quarterly reporting processes through the Risk Committee to the AKG Board.

We have reviewed and updated the following strategies to measure the effectiveness of our progress into 2026:

- Initial review of operational policies and procedures along with update to client modern slavery information resources.
- Implemented a Modern Slavery Register to track suppliers and their risk ratings that will be tabled as a standard agenda item at each Risk Committee meeting.
- Establishing formal internal modern slavery reporting (including incident reporting).
- The number of existing material suppliers who have been reviewed and the number of findings which have been opened and closed. All new suppliers are screened through new modern slavery assessment processes.
- Utilising the LMS to incorporate modern slavery staff training and education modules which will also report on the number of staff completing refresher programs.

As part of the annual publishing of the Statement, an annual audit will be conducted by the Risk Committee and future statements will include an audited progress assessment of the preceding Modern Slavery Statement Actions.

## 6. Consultations

The Risk Committee has overseen the preparation and finalisation of this Statement and supported its approval by the AKG Australian Country Lead and the AKG Board.

The AKG Australian Country Lead and the AKG Board have been briefed on progress and the final Statement has been approved and signed off.

# ATTACHMENT A

## Controlled Entities

This Statement includes all Australian-incorporated controlled entities.

Covntrolled Entity	Country of incorporation	Ownership
AngusKnight Institute Pty Ltd	Australia	100%
InjuryNet Australia Pty Ltd	Australia	100%
Jobfind Centres Australia Pty Ltd	Australia	100%
MAX Foundation Pty Ltd	Australia	100%
MAX Solutions Pty Ltd	Australia	100%
Maximus Australia Holding Company Pty Ltd	Australia	100%
RISE Ventures Pty Ltd	Australia	100%
Stirling Institute of Australia Pty Ltd	Australia	100%
uLaunch Pty Ltd	Australia	100%
Victorian Fitness Academy Pty Ltd	Australia	100%



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