

## Modern Slavery Policy & Statement

### Introduction

Ethos BeathChapman Australia recognises that all businesses have an obligation to prevent slavery, slavery-like practices and human trafficking and will do all in its respective power to prevent slavery, slavery-like practices, and human trafficking within its business and within the supply chains through which it operates.

This statement addresses Ethos BeathChapman Australia's obligations and compliance in relation to the "Modern Slavery Act 2018 (Cth)" ('the Act') and applicable state legislation and highlights the steps we take to ensure there is no slavery or human trafficking occurring within the organisation or its supply chains. One of our company's most valuable assets has always been its reputation for integrity and fairness. Maintaining this reputation within our market is an essential pre-requisite to our continued success.

Ethos BeathChapman Australia acknowledges that it is required to submit its modern slavery statement within 6 months from the end of each reporting period.

### Ethos BeathChapman Australia Structures and Operations

Ethos BeathChapman Australia is part of the Will Group: a collective of 9 human resource organisations. Ethos BeathChapman Australia has 2 offices in Sydney and Melbourne.

Ethos BeathChapman Australia specialises in permanent, contracting and project recruitment across various job families including Technology, Project management, Accounting and Audit, Risk & Compliance and Sales & Marketing.

Ethos BeathChapman Australia currently employs over 50 direct staff.

Ethos BeathChapman Australia's modern slavery policy is a joint statement that covers Ethos BeathChapman and Quay Appointments. The ultimate parent company of the Ethos BeathChapman Australia is the Will Group, Inc. a Japanese listed company. Ethos BeathChapman Australia entities use the same policies and processes, operate in the same sector, and have many shared suppliers. The modern slavery statement has been prepared on a consolidated basis to address modern slavery risks across all Ethos BeathChapman Australia entities.

Modern slavery can take on many forms including the trafficking of people, forced labour, child labour, servitude, and slavery. We take responsibility for supplying staff extremely seriously and are aware of the potential for being targeted by traffickers and unlicensed labour hire providers, in local jurisdictions where licencing is a requirement. Our own processes around candidate engagement ensure our employees are alert to the signs of exploitation, so that we may take the necessary action promptly and effectively should it be identified. Sectors affected include, but are not limited to, construction & property, engineering, and supply chain.



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## **Suppliers to Ethos BeathChapman Australia**

We contract with third parties who provide services to assist with the everyday running of our business, such as IT service providers, administration, and facilities companies (who, for example, may provide cleaning services to our offices) as well as companies who provide office supplies to our office network.

We acknowledge that by virtue of contracting with other parties, whether as a client or as a supplier, there is always some risks that may contribute to modern slavery practices. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant, and professional manner by adhering to the Ethos BeathChapman Australia code of conduct. We also expect our suppliers to promote similar standards in their own supply chain.

## **Actions taken to assess and address modern slavery risks**

### **Candidate Engagement**

Ethos BeathChapman Australia ensures that strict compliance checks are carried out for all candidates it supplies. We verify the identity of each worker and their right to work before supply commences. We also have a dedicated payroll team who audit the relevant modern award that a temporary worker is engaged under to ensure they are paid correctly in accordance with the relevant award or agreement.

As part of our commitment to identify and eradicate slavery and human trafficking and to continuously assess and address modern slavery risks, we have in place a process to undertake due diligence on our supply chain network to ensure compliance with legislative obligations, and such compliance forms part of our contractual relationship with suppliers. We will use best endeavours to procure from our suppliers by contract that full compliance with the Act must be achieved. We will use best endeavours to separately require that any actual or potential risk of breaching the Act that suppliers identify in their own operations or supply chains are communicated to us. This information will be assessed and evaluated appropriately by senior members of Ethos BeathChapman Australia management on an ongoing basis.

### **Supplier Code of Conduct**

Ethos BeathChapman Australia created a Supplier Code of Conduct that is relevant to all suppliers to Ethos BeathChapman Australia. Suppliers are expected to adhere to the Ethos BeathChapman Australia supplier code of conduct, which includes specific reference to various matters including human rights, anti-bribery and corruption, and modern slavery and human trafficking, and suppliers should have in place a policy recognising, respecting, and protecting the human rights of their employees, those of their supplier and business partners and the communities affected by the suppliers' operations.

Ethos BeathChapman Australia's position, which is mirrored in its Supplier Code of Conduct, is that:



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- Employees should be free to choose to work for their employer and to leave the company upon reasonable notice
- All employees must be provided with a clear contract of employment, which complies with local legislation
- All employees must be treated in a fair and equal manner and with dignity and respect
- Any form of discrimination, victimisation, or harassment on any prescribed grounds under commonwealth, state or territory laws should be prohibited. This includes marital status, pregnancy, family responsibilities, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, religious belief, age, trade union activity or any other prescribed ground
- All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions
- All slavery and human trafficking laws must be complied with including, but not limited to, the provisions of the Act and any applicable state legislation. Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in Australia or elsewhere, both internally and within their supply chains and other external business relationships.

### **Co-operation with client due diligence**

Our clients in the private sector operate in many industries and range in size from small businesses through to local subsidiaries of global groups. We also work closely with government departments and agencies across all jurisdictions. That being the case, Ethos BeathChapman Australia is familiar with participating in clients' audits of their respective supply chains. In doing so, Ethos BeathChapman Australia is also able to observe its client's own practices on the prevention of modern slavery.

### **Engagement with Suppliers**

During the reporting period, Ethos BeathChapman Australia engaged with various companies that provide services to our Ethos BeathChapman Australia office network. This involved providing copies of Ethos BeathChapman Australia Supplier Code of Conduct to these suppliers and enquiring as to the modern slavery compliance practices and procedures.

### **Reviewing Contractual Documentation**

Ethos BeathChapman Australia review its standard form and client contract annually to include specific references to modern slavery law compliance.

### **Ability for Employees to Raise Concerns at Work**

All Ethos BeathChapman Australia employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through whistleblowing procedures. Ethos BeathChapman Australia is committed to protecting employees when disclosing



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malpractice and will ensure that all disclosures made in compliance with whistleblowing procedures will be treated confidentially and without fear of retaliation. It is by receiving and evaluating feedback and maintaining a culture of compliance that Ethos BeathChapman Australia can assess the effectiveness of its practices and procedures.

### **Training**

All staff within Ethos BeathChapman Australia are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. We have undertaken a review of our policies and procedures to ensure our colleagues have access to any additional information and support they may require regarding human trafficking, forced labour, child labour, servitude and slavery.

### **Ethos BeathChapman Australia Supplier Code of Conduct**

Ethos BeathChapman Australia created and published its Supplier Code of Conduct, a formal company document requiring Ethos BeathChapman Australia suppliers to operate ethically, professionally, and to be legally compliant in all respects including, relevantly, in relation to modern slavery. The document is furnished to Ethos BeathChapman Australia recruitment services suppliers (that is, second-tier suppliers who assist Ethos BeathChapman Australia in providing Ethos BeathChapman Australia recruitment and managed services to Ethos BeathChapman Australia clients) and to our office services suppliers (being those suppliers who provide services linked to our facilities management requirements). Ethos BeathChapman Australia will continue to do so.

### **Approval**

This statement was approved by the Board of Directors for Ethos BeathChapman Australia Pty Ltd at the Ethos BeathChapman Australia board meeting on the 15<sup>th</sup> of September 2022.

Andrew Keayes, CEO

*Andrew Keayes*  
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15/09/2022