



Modern Slavery Statement

Financial Year Ending 2025



Message from our Board Chair and Managing Director

The BUSY Group's (TBG) vision is to see more people in jobs, more people learning new skills, and more communities experiencing positive change—achieved in partnership with employers and industry. This vision is the driving force behind our commitment to the communities we serve. As a not-for-profit organisation, our profits are reinvested directly into community initiatives.

TBG continues to grow rapidly. Since publishing our first Modern Slavery Statement in 2023, we have expanded to employ approximately 1,120 staff across more than 150 locations throughout Australia, UK and NZ. In 2023, we took a bold step into the global arena by expanding into the United Kingdom, and in 2025, we further extended our international footprint by opening our first overseas school campus in Auckland, New Zealand. We are proud to bring our successful Australian experience and reputation to support these communities through skills development, education, and employment opportunities.

In line with our ongoing commitment to the Modern Slavery Act 2018 (Cth) and the UK Modern Slavery Act 2015, TBG is pleased to present its third Modern Slavery Statement. This statement publicly reaffirms our dedication to compliance with the Act and outlines the progress and continuous improvement efforts we have made since our initial statement.

This statement applies to The BUSY Group and its legal entities:

- ▶ ON-Q Human Resources Ltd (t/a BUSY Ability)
- ▶ Skill360 Australia Ltd
- ▶ One Stop Group Pty Ltd
- ▶ Apprentices-Trainees-Employment Ltd
- ▶ Smart Employment Solutions Ltd
- ▶ The BUSY Group Investments Pty Ltd
- ▶ The BUSY School Ltd
- ▶ The BUSY School NZ Ltd
- ▶ The BUSY School Victoria Ltd
- ▶ The BUSY Group UK Ltd
- ▶ Case 4 Health 2 Employment Ltd
- ▶ Case-UK CIC
- ▶ Health 2 Employment (H2E) CIC
- ▶ The BUSY Group Canada

It is a priority of the BUSY Group Board and each of the subsidiary Boards to ensure we identify the potential risks of modern slavery and implement plans to address such risks with ongoing monitoring and review. TBG's Modern Slavery Statement covers the reporting period 1 July 2024 to 30 June 2025 and was approved by The BUSY Group Board on 26 November 2025.



Kerry Gibb

A handwritten signature in white ink that reads "Kerry Gibb".

Chair

The BUSY Group



Paul Miles

A handwritten signature in white ink that reads "Paul Miles".

Managing Director

The BUSY Group



Our History

The BUSY Group (TBG) was established in 1977 with the simple aim of delivering training and employment programs to homeless youth on the Gold Coast. BUSY is an acronym for Backing Unemployed Southport/Surfers Paradise Youth. It was founded by our Chairman, Martin Punch, who set out to deliver this aim by obtaining funding from the Australian Government to run a community youth support program.

A little over twenty years later, in 1998, BUSY successfully tendered for the Australian Government's Apprenticeships Support Services and, from then on, became known as BUSY At Work. BUSY At Work has remained a not-for-profit association with the same values that have guided our decisions and our behaviour for over 40 years. Over this time, we have provided Apprenticeship Support Services to more than 60,000 businesses across Queensland and we are the longest-serving provider of Apprenticeship Support Services in the state. Since this time, BUSY At Work has grown to provide a number of state and federal contracts in employment services and educational rebate programs.

In 2017, BUSY At Work merged with ON-Q Human Resources (now known as BUSY Ability). BUSY Ability has been supporting people with a disability for over 30 years and is a registered NDIS provider. The experience and knowledge within the disability employment sector is an invaluable asset for The BUSY Group, supporting us to empower and place more people into jobs across a larger Australian footprint.

In 2019, Skill360 became a part of The BUSY Group. Skill360 is based in North Queensland and South East Queensland providing vocational training through their Registered Training Organisation to empower careers for the business administration, construction trades and hospitality industries.

The BUSY Group opened the first BUSY Schools campus in Cairns in 2020 to support senior high school students to re-engage with education, complete their QCE and find a career pathway. Following the success of our first campus, BUSY has opened an additional 8 campuses across Queensland. The BUSY School offers an alternative for Year 11 and 12 students who may be struggling with traditional education and we've already supported hundreds of students to re-engage with their education, go onto further study or find a career path upon graduation.

In 2021, BUSY Health was introduced as an additional service offering for our valued clients. BUSY Health delivers psychological and occupational health services to individuals, community organisations, schools, and workplaces, with a focus on empowering people for work or study and supporting the wellbeing of teams in their workplaces or schools.

In 2022, One Stop Training, a Registered Training Organisation based in South East Queensland, joined The BUSY Group. One Stop Training provides a comprehensive range of accredited training, tickets, and licences for the supply chain management, automotive, and construction industries.

The BUSY Group welcomed Smart Employment Solutions in 2023, a South East Queensland-based Group Training Organisation, into the Group. This strategic partnership with Skill360 is designed to enhance apprenticeship management services for employers across Queensland. With nearly 40 years of experience, Smart Employment Solutions shares The BUSY Group's commitment to advancing employment, training, and education. The inclusion of Skill360, with its strong presence in North Queensland, further strengthens the synergy and reach of our operations.

In the latter part of 2023, The BUSY Group expanded globally with its entry into the UK market.

In 2024, CASE-UK and Health 2 Employment joined the Group, both organisations closely aligned with BUSY's purpose of delivering innovative Health, Occupational, and Vocational Services. Also in 2024, The BUSY Group Canada was established in Ontario, Canada, to further develop programs that extend our impact on a global scale. As a newly formed entity in its start-up phase, it is currently focused on laying the foundations for future growth and program delivery aligned with TBG's mission and values.

The BUSY School NZ launched its first campus in Auckland at the beginning of 2025, offering an alternative education program for senior high school students. The initiative provides young people with the opportunity to re-engage with learning, complete their schooling, and gain a head start into employment. To further strengthen our skills business, Apprentices-Trainees-Employment Ltd, trading as Squad, joined The BUSY Group in March 2025. With over 40 years of experience, Squad is renowned for building exceptionally trained and well-resourced workforces within our communities.

Our aim is to extend our reach, deepen our positive influence in communities both domestically and internationally, and drive sustainable change. This strategic move reflects our commitment to a future where our services resonate beyond borders, making a significant, lasting impact for the greater good.

BUSY AT A GLANCE

The BUSY Group is a not-for-profit organisation providing apprenticeship, employment and skills solutions to businesses large and small. Our services provide a comprehensive and integrated approach to employment, education, training and health that drive positive impact.

150  **locations throughout Australia, UK and NZ**

Supporting people with disability for **over 30 years**

INTERNATIONAL EXPANSION



OVER 40 YEARS
experience

Apprenticeship Support Services to more than

60,000

businesses across Queensland



1,120 Staff

GOVERNMENT CONSULTATION
in the portfolios of employment and training

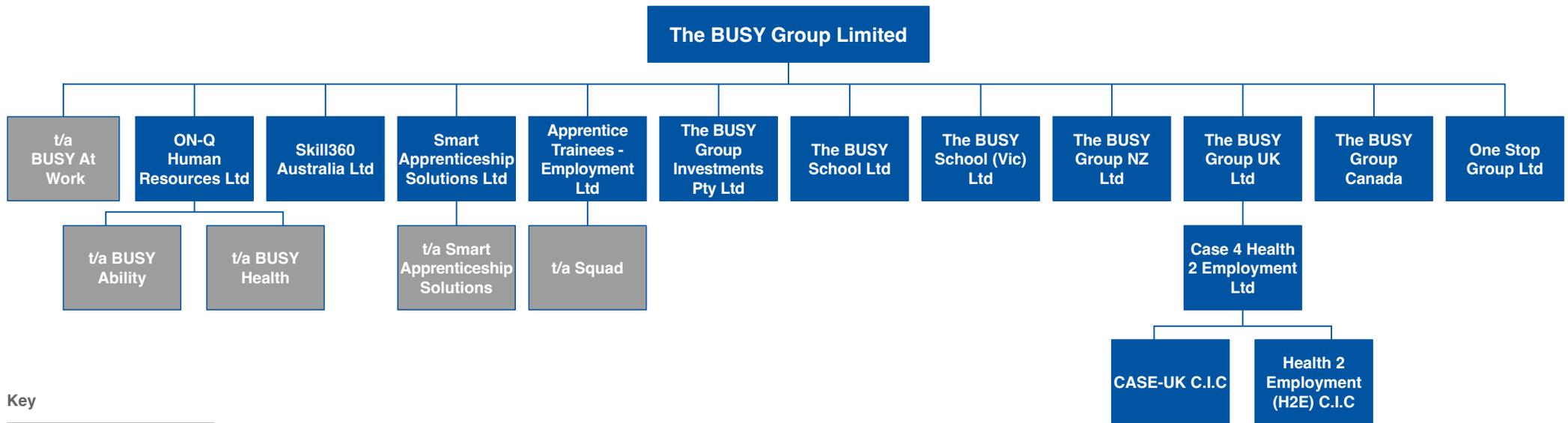
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Alternative Education Schools **across Australia and New Zealand**



The BUSY Group Structure

With head office located in Southport, Queensland, Australia, The BUSY Group Ltd, ABN 17 575 363 535 is a not-for-profit public company limited by guarantee. TBG has a number of subsidiary companies which contribute to the combined total profit of the Group and are affected by the provisions of the Act. Each of the entities are supported by a centralised corporate group services team which comprises of People and Culture (HR), Business Support, Workplace Health and Safety, Quality and Compliance, Finance, and Information Technology Services.



Key

Legal entity
Business/trading name

What We Do

BUSY is recognised as an nationwide organisation with authentic local connections, renowned for its capacity to quickly establish customised services for government stakeholders and it's communities. Additionally, BUSY collaborates with other non-profit organisations and private companies to provide comprehensive solutions.

BUSY At Work

BUSY At Work is a not-for-profit Australian organisation dedicated to advancing workforce and community participation through specialised apprenticeship, employment, and support services. It empowers individuals, employers, and communities by delivering a diverse range of programs, including employment assistance, scholarships, transition support, assistance for veterans, youth engagement, and community development initiatives. Guided by its mission—*“more people in jobs, more people learning new skills, and more communities exposed to positive change”*—BUSY At Work continues to foster meaningful opportunities and long-term impact across Australia.

BUSY Ability

Provides no-cost employment support and services to people with disabilities, employers and the community. BUSY Ability is contracted by the Australian Government's Workforce Australia to provide Specialist Employment Services, supporting people with a lived experience of the justice system who may require extra support into employment. BUSY Ability also provides Disability Employment Services through its subcontracting partner CoAct.

Skill360

TBG's specialist Registered Training Organisation delivering industry-endorsed, learner-focused flexible skills solutions. Skill360 provides nationally-recognised qualifications and short courses to empower careers for the business administration, construction trades, and hospitality industries.

Smart Apprenticeship Solutions

A registered Group Training Organisation, SAS provides training and education opportunities through Apprenticeships and Traineeships focussing on young people and young people living with a disability.

Squad

A Registered Training Organisation and Group Training Organisation, Squad provides a comprehensive service for businesses looking for apprentices and trainees, labour hire and assisting with specialist recruitment needs.

The BUSY School

The BUSY School operates a network of nine campuses in Queensland, Australia and one in Auckland, New Zealand, each committed to enhancing the social, educational and employment prospects of young people. These campuses focus on supporting those who have disengaged or are at risk of disengaging. The BUSY School offers eligible students the opportunity to complete their schooling while simultaneously acquiring practical workplace skills and explore or commence career pathways.

BUSY Health

Our team of allied health practitioners including accredited psychologists, occupational health practitioners and more, work one-on-one or in group sessions, depending on the individual or organisational needs, providing:

- ▶ NDIS Supports
- ▶ Mental Health Support (including Medicare packages)
- ▶ Support for students and schools
- ▶ Training and Consultancy
- ▶ Employment Service Client Support

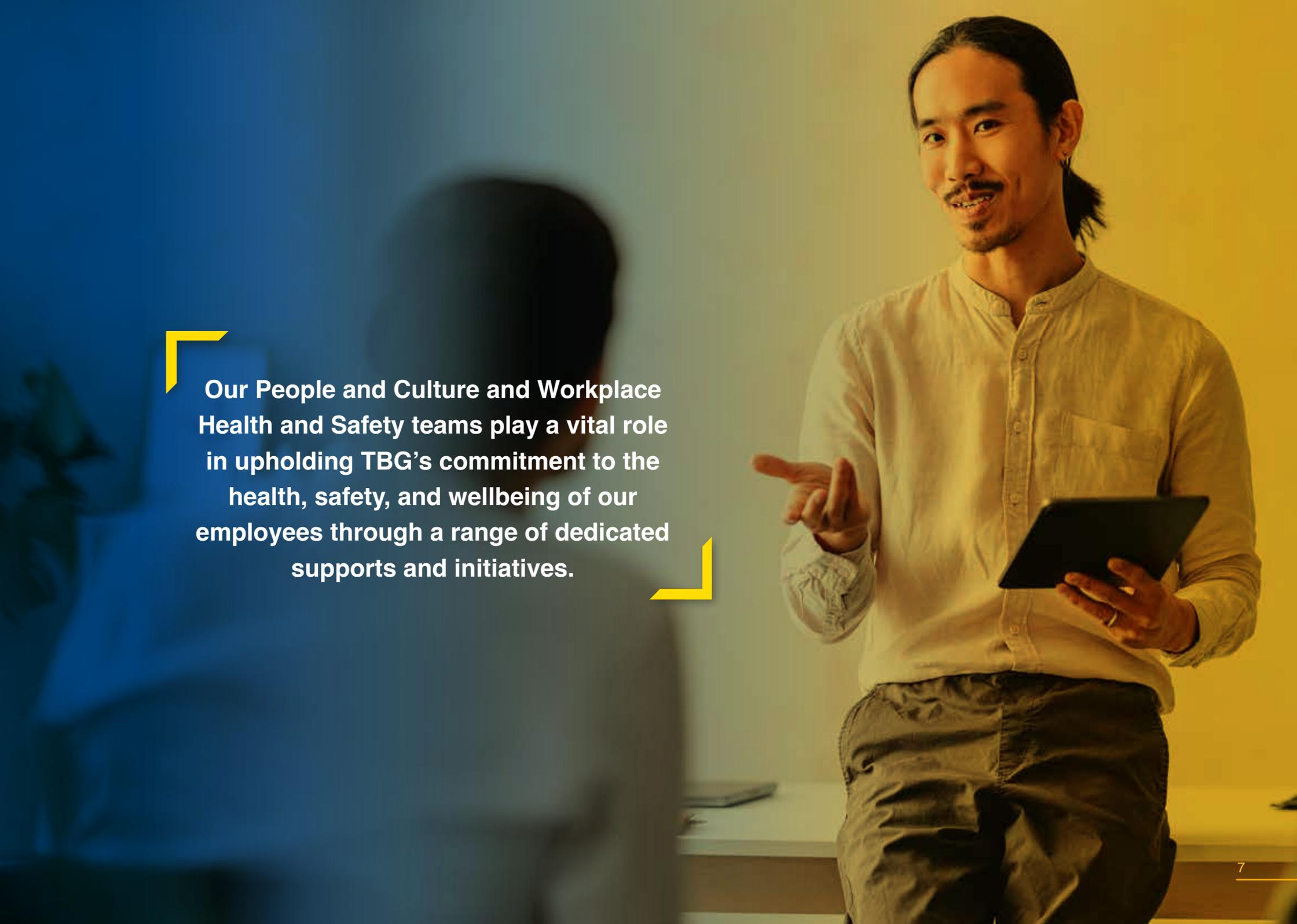
CASE-UK

Delivering high-quality, employment focused, mental and physical health services in Wales and South West England. Through programs like Able Futures and In-Work and Out-of-Work Services, Case-UK sets itself apart with its deep understanding of the lived experience of many of their clients.

Health 2 Employment

A national not-for-profit health provider dedicated to helping people overcome health barriers and move closer to sustainable employment. Delivering evidence-based occupational health, physiotherapy, and mental health interventions that improve job outcomes while reducing sickness absence.

¹ Business Support is responsible for supporting the Group with procurement, facilities, fleet, and asset support services.

A man with a ponytail, wearing a white button-down shirt and dark trousers, stands in a modern office. He is holding a tablet in his left hand and gesturing with his right hand. The background is a bright, yellowish wall. In the foreground, the back of a person's head is visible, looking towards the man. The overall lighting is warm and professional.

Our People and Culture and Workplace Health and Safety teams play a vital role in upholding TBG's commitment to the health, safety, and wellbeing of our employees through a range of dedicated supports and initiatives.

Identification and addressing modern slavery practices

During the reporting period, The BUSY Group (TBG) assessed both direct and potential indirect risks of modern slavery across its operations and supply chains. The assessment identified a low overall organisational risk level, which is attributed to factors observed in workforce practices, supply chain analysis, and program operations. These contributing factors are outlined in more detail in the following section.

Workforce

TBG maintains employment arrangements that are strictly governed by the Australian National Employment Standards (NES), NZ Minimum Employment Standards, relevant modern awards, and the terms outlined in individual employment contracts. To ensure compliance and transparency, regular payroll audits are conducted and reported to the Board-delegated Finance, Audit and Investment Committee for oversight.

Our People and Culture and Workplace Health and Safety teams play a vital role in upholding TBG's commitment to the health, safety, and wellbeing of our employees through a range of dedicated supports and initiatives.

In the United Kingdom, employment practices are aligned with the UK Employment Rights Act 1996, the National Minimum Wage Act 1998, and the Working Time Regulations 1998, ensuring that all employees are treated fairly and in accordance with local legal standards. These frameworks serve as the UK equivalents to Australia's NES and award system and support our commitment to ethical employment practices across jurisdictions.

TBG also maintains a comprehensive suite of company policy documents, informed by jurisdictional legislation and aligned with ISO standards where applicable. These policies are managed under our Quality Management System and are:

- ▶ Reviewed at cyclical intervals to ensure currency of information
- ▶ Approved at the appropriate governance level prior to distribution
- ▶ Maintained under strict document control practices
- ▶ Promptly removed from distribution when invalid or obsolete, and
- ▶ Designed to meet both customer expectations and regulatory requirements

TBG places significant focus on diversity through several policies, committees, memberships and annual reporting requirements across the Group such as:

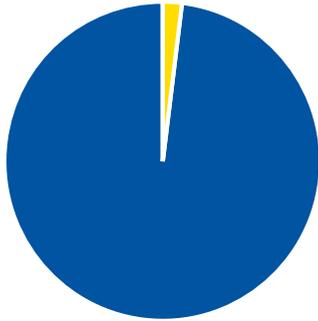
- ▶ Workforce Gender Equality compliance reporting
- ▶ Indigenous Procurement Policy reporting
- ▶ First Nations Recruitment Retention and Professional Development Strategy
- ▶ TBG Quality, Risk and Safeguarding Committee (Internal Committee)
- ▶ TBG Governance and Risk Committee (Board Subcommittee)
- ▶ TBS Governance, Compliance and Risk Committee (Board Subcommittee)
- ▶ WHS Committee (Internal Committee)
- ▶ TBG Reconciliation Action Plan Committee (with Endorsed and Published Plan)
- ▶ BUSY Ability Aboriginal and Torres Strait Islander Committee
- ▶ Australian HR Institute Membership
- ▶ TBG UK Governance and Risk Committee

In conjunction with TBG's internal Modern Slavery Policy, which includes a clearly defined response protocol, all employees are encouraged to familiarise themselves with the Whistleblower Protection Policy. This policy provides a confidential and structured framework for reporting, investigating, and addressing allegations of reportable conduct including any suspected instances of modern slavery within TBG's operations or supply chains.

Supply Chain Analysis

For the purpose of this year's statement, TBG analysed Australasian payments exceeding \$250K. This review focused on direct vendor relationships and did not extend to investigating the suppliers used by those vendors. During the 2025 reporting period, the number of international vendors decreased by two compared to the previous year. The combined spend with these vendors remains extremely low, accounting for less than 2% of the organisation's total expenditure.

Australian vs International Spend

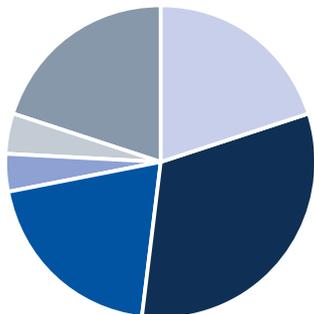


- Australian Vendors
- International Vendors

Majority of these international vendors provide professional services, while the remainder are associated with IT applications, subscriptions, or related services. These vendors operate in sectors and regions that are not typically classified as high risk for modern slavery

Consistent with the previous reporting period, an analysis was conducted on the Group's high-spend Australasian vendors (those with annual spend exceeding \$250K). This review identified eleven vendors with an international footprint, including a subsidiary or parent company located in the EMEA, UK, APAC, or NA regions. Half of the vendors have published statements in the Australian Government's Modern Slavery Statement Register, and those with operations based within the UK, 50% of these vendors have published statements in the UK Modern Slavery Statement Registry. This analysis continues to provide assurance that TBG's supply chain presents a very low risk of exposure to modern slavery practices.

International Spend by Region



- UK 20%
- Germany 4%
- Canada 32%
- Denmark 4%
- USA 20%
- NZ 20%



Procurement practices

Within the Australasian TBG Preferred Supplier Application, questions relating to modern slavery practices are mandatory and expectations are clearly outlined in the TBG supplier agreement. This has continued to ensure greater visibility to the Business Support team in conducting their initial assessment of the level of risk in the supplier's operations.

For the FY25 period, review of the question within the Preferred Supplier Application Does your organisation have a policy or policies in place to deal with Modern Slavery? revealed that 33% responded Yes to having an established policy and provided a copy. This represents an increase of almost 10% from the previous reporting year. For the 67% of suppliers that responded No, 63% of these provided further information about how they manage risks of modern slavery within their business, assuring risks are mitigated. The remainder who did not provide additional information at the time of application were small operators who answered 'I work alone/have no employees, contractors or apprentices'.

Due diligence is undertaken with all vendors operating in the United Kingdom to identify, assess, and mitigate the risks of modern slavery and human trafficking within our supply chains. Whilst each individual company within our group may not be required to report under the UK Modern Slavery Act 2015 in their own right, we apply a consistent and proactive approach to ethical sourcing and compliance across all entities.

To date, TBG has not identified any possible cases of modern slavery during engagement with any vendor. If potential risks were detected TBG would act in accordance with jurisdictional Modern Slavery Response Protocols.

Program operations

There are several factors that elevate the risk of modern slavery, including high-risk geographies, sectors with complex multi-tiered supply chains, third-party labour arrangements, and vulnerable populations. TBG recognises the inherent risks associated with labour-hire models and has taken a proactive and sustained approach to mitigating these risks—particularly within its Group Training Organisation (GTO) and labour-hire entities.

During the previous reporting period, TBG implemented a series of targeted actions which have since become standard practice across our Australian businesses:

- ▶ Host Employer Agreements were updated to include explicit references to the Modern Slavery Act 2018 (Cth), safeguarding principles, and the protection of human rights.

- ▶ A Safeguarding and Protection of Human Rights Acknowledgement Form is now routinely completed during field officer visits for host employers who signed agreements prior to the update.
- ▶ The Apprentice Induction Pack was revised to include education on safeguarding, modern slavery awareness, and a clear reporting mechanism.
- ▶ Modern slavery information, including TBG's statement and reporting tool, is now permanently available on the websites of all TBG entities.

These measures reflect TBG's ongoing commitment to identifying, addressing, and preventing modern slavery risks within its operations and supply chains.

Through our programs and partnerships with industry, TBG ensures that staff working with program participants—many of whom belong to vulnerable cohorts—are equipped to identify both direct and indirect risks of modern slavery and uphold broader human rights principles. This is achieved through the following standard practices:

- ▶ Adhering to program-specific guidelines that outline TBG's responsibilities in assessing employment conditions, including validating award rates of pay and conducting workplace risk assessments.
- ▶ Educating employers on where to access employment-related information and resources, such as the Fair Work Ombudsman (Australia), Fair Work Agency (UK), and Labour Inspectorate (New Zealand).
- ▶ Ensuring job advertisements for program-based roles are free from discrimination, with role suitability assessed solely on an individual's ability to perform the job—regardless of gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, or political affiliation.
- ▶ Training staff to recognise red flags, including unusual employer behaviour or industries known to present higher risks of modern slavery.
- ▶ Providing accessible reporting channels for program participants to raise concerns or complaints—either directly through mentoring staff or via TBG's online feedback platforms, with a commitment to prompt and appropriate responses.

A woman with long brown hair and glasses on her head is smiling and looking at a document held by another person. The background is a blurred green wall. The image has a blue tint on the left and a yellow tint on the right.

TBG is committed to the ongoing identification and mitigation of modern slavery risks across our operations and supply chains. This commitment is supported by a process of continuous improvement, overseen by our Group Quality and Compliance team.

Assessment and review

TBG is committed to the ongoing identification and mitigation of modern slavery risks across our operations and supply chains. This commitment is supported by a process of continuous improvement, overseen by our Group Quality and Compliance team. To monitor the effectiveness of the actions we have implemented, TBG has embedded the following practices as part of our standard operations:

- ▶ Ongoing consultation with Business Support to strengthen procurement processes, ensuring ethical sourcing and supplier accountability
- ▶ Providing education and training to staff and stakeholders on modern slavery awareness and prevention
- ▶ Maintaining robust governance frameworks that support transparency and compliance, and
- ▶ Conducting regular internal monitoring and reviews to assess performance and identify areas for improvement.

Reinforcing our procurement process

During the reporting period, the Group Quality and Compliance Team continued to conduct quarterly reviews of modern slavery responses submitted through the Preferred Supplier Application. These reviews ensure that both new and existing vendors are accurately completing the relevant sections and providing TBG with meaningful information about their practices to identify and mitigate modern slavery risks.

To further strengthen this process, additional training was delivered to the Business Support team, equipping team members with the knowledge to identify suppliers that may present a higher risk of modern slavery based on factors such as industry, product, or service type.

Complementing this training, educational resources, including those provided by the Australian Border Force were distributed to the team. These materials support supplier education and promote more informed and constructive engagement when discussing modern slavery practices.

The Risk Assessment section of the Preferred Supplier Application has also been enhanced to automatically escalate any procurement rated as medium or high risk to the Group Quality and Compliance Team for further assessment. If required, this more robust assessment will be carried out using a comprehensive questionnaire 'Eliminating modern slavery toolkit' developed by the Queensland Government. This questionnaire has been

designed as a tool to facilitate collaborative two-way engagement between agencies (and their partners) and suppliers. It provides for adjustment proportionate to the level of risk of the procurement and as appropriate to prevent barriers to participation by small and medium enterprises, social enterprises and First Nations businesses.

Where a procurement is deemed high risk, this will be flagged early in the process and the questionnaire can be incorporated into the contract application process itself to assist TBG in learning more about the suppliers operations when it comes to addressing modern slavery risks. These cases will also be presented to the Governance and Risk Committee for review and oversight.

Ongoing education and training

In upholding the commitment made in our initial statement, during this current reporting period TBG has published internal Modern Slavery Awareness training across the Group, via the Learning Management System (LMS), which to date had been completed by the teams deemed most at risk of exposure to modern slavery practices, including Business Support and Group Training. Reporting from the LMS on policy acknowledgement, training completion rates and quiz competency will continue to inform the effectiveness of this module for continuous improvement purposes.

In addition, the Modern Slavery Policy has been strengthened to include a response protocol procedure and reporting form, both accessible to employees and external stakeholders. TBG will continue to promote awareness of modern slavery risks throughout all levels of the organisation through internal communication channels and training.

Governance practices

During this reporting period, TBG has maintained accreditation or approval to the following standards. This ensures we uphold the highest of levels of quality to support the delivery of the programs and services to achieve our purpose.

- ▶ ISO 9001:2015 Quality Management Standards,
- ▶ ISO 27001:2022 Information Security Management Standards,
- ▶ Australian Government Right Fit for Risk Cyber Security Accreditation,
- ▶ Membership in the Australian Department of Defence Industry Security Program (DISP),
- ▶ National Standards for Disability Services,

- ▶ Employment Services Standards, and
- ▶ Recruitment Consulting Services Association Standards
- ▶ WorkSafe Queensland Bronze Recognition – Be Recognised program
- ▶ Cyber Essentials Certificate of Assurance

The Group's internal and relevant entity committees will ensure continued corporate governance and risk oversight of the relevant legislative obligations, policies and practices impacting the organisation. The Governance and Risk Committees (Board subcommittees) will continue to monitor the success of the commitments outlined in this statement and mandatory reporting requirements via annual review. In addition to stringent governance practices, risks of modern slavery forms part of the due diligence process for any new venture to ensure that ethical investments are considered. As part of the Quality Management System, policies which support TBG's Modern Slavery initiatives will be reviewed in accordance with the Documented Information Procedure revision process.

Internal monitoring and review

Throughout the reporting period, the Group Quality and Compliance Team has actively ensured that key internal documents such as the Modern Slavery Policy Statement, Purchasing and Procurement Policy, and the Preferred Supplier Application have been updated to reflect evolving legislative requirements and best practices.

As part of TBG's structured compliance framework, ongoing monitoring of legislative developments and industry trends remains a priority, with input and oversight from teams operating across multiple jurisdictions to ensure alignment with local and international regulatory expectations.

Consultation

Each of TBG's subsidiary entities, as outlined in the Group Structure, has been consulted in the preparation of this Modern Slavery Statement. This process ensures that the risks, actions, and perspectives of all controlled entities are accurately reflected.

Ongoing reporting obligations and information regarding the Group's actions to address modern slavery risks have been communicated to the TBG Global Executive Team, key personnel from each entity, and relevant Corporate Group Services staff. This collaborative approach supports alignment across the organisation and reinforces our shared commitment to ethical practices.

Consultation will continue as part of TBG's broader framework for monitoring, review, and continuous improvement, ensuring that all entities remain informed, engaged, and accountable in addressing modern slavery risks across our operations and supply chains.



Unbounded Possibilities

BUSY brings opportunities to the world that wouldn't otherwise exist, because of how differently we see and think about things, and how deeply we care.

