

2024

# Modern Slavery & Human Trafficking



The  
Transformation  
Group



The Transformation Group (ABN 53 634 381 490) ('TTG') has developed this Modern Slavery Statement ('Statement') in line with the Modern Slavery Act 2018 (Cth) ('the Act'). This Statement outlines the action TTG has taken to identify and address modern slavery risks in our operation and supply chains during the reporting period 1 July 2023 to 30 June 2024.

This is the First Statement prepared by The Transformation Group.



# Table of Contents

- 01 Company background
- 02 Executive brief
- 03 Our position & approach
- 04 Report entity
- 05 Our business & supply chain
- 06 Risk assessment
- 07 Policies
- 08 Supplier due diligence
- 09 Awareness
- 10 Training
- 11 Measurement



# The Transformation Group exists to empower individuals and organisations to unlock their potential for a better tomorrow.

Our proven track record includes overseeing a distributed workforce of thousands of tech professionals in Australia.

Each day, we bring people and technology solutions together to accelerate business transformation through two entities – Talenza and Tranzformd.

## Tranzformd

Tranzformd is the trusted professional services consultancy & program delivery partner of leading Australian organisations, delivering resources at the scale, speed and agility needed to drive successful outcomes of ambitious transformation projects.


Our experience and extensive network of top partners allow us to manage delivery risk and deploy highly specialised and skilled industry experts who will seamlessly integrate into your team to deliver value to your organisation long after successfully delivering your change and transformation projects.

## Talenza

Talenza is our full-service technology and business transformation workforce solutions agency. With a focus on understanding the unique challenges faced by organisations, Talenza takes pride in its commitment to truly partnering with businesses to combat unique talent challenges. We exclusively employ experienced consultants with domain expertise across specialised technology, digital and business transformation areas to address talent mobility needs in contract recruitment, permanent recruitment, managed solutions (RPO) and executive search.

Our commitment to collaboration and data-driven insights underscores our understanding of the transformative power within organisations. At The Transformation Group, we are dedicated to helping businesses unlock the full spectrum of human potential, enabling them to achieve their goals and beyond. Together, lets redefine what's possible.



 Our offices

## EXECUTIVE BRIEF

Since inception, each of our organisations have faced various challenges in navigating market conditions and geopolitical uncertainties. However, our recent group review has revealed substantial and positive strides in upholding our commitments and due diligence against modern slavery.

To strengthen our governance across the group, we have integrated the modern slavery into our revamped Supplier Code of Conduct and Whistleblower Policy to explicitly set expectation on our suppliers to identify and report issues of concern immediately, transparently, and honestly.

As part of our strategy, we have made additional investments into developing training material on human rights and modern slavery. Our integrated and progressive approach has established a program of mandatory training for all key employees, ensuring heightened awareness throughout our company. We have maintained continuous engagement with our suppliers and employees, incorporating their feedback to refine our modern slavery approach and enhance our risk management approach and supporting tools.

We have hired dedicated specialist resources to oversee and ensure each entity and collectively TTG can achieve progress towards our commitments.

During the reporting period that this statement covers, we have engaged in active consultation with all companies within the Group to achieve the development of this statement.



**Henry Gatehouse**  
Talenza CEO



**Andrew Sully**  
Tranzformd CEO

Throughout this consultative approach, the matters discussed include details of the Modern Slavery Act 2018 and:

- Our reporting requirements
- Information regarding the actions we intend to take to address these requirements
- Training, guidance, and relevant materials to ensure collective compliance.

In collaboration with our high-risk suppliers, we endeavour to identify and tackle potential human rights risks within these supply chains. Our comprehensive progress to date and future priorities are outlined in this Statement. While we have made substantial strides in our compliance with our modern slavery and human rights obligations, we acknowledge that there is always room for improvement. Modern slavery is a complex, systemic issue that demands unwavering efforts to eradicate it.

We remain committed to partnering for progress with governments and regulators, non-governmental organisations, peers, industry bodies, and networks. In the face of external challenges, rigorous due diligence regarding human rights risk is paramount.

The Transformation Group are dedicated to continuously refining and evolving our approach, working alongside our customers, suppliers, and stakeholders to mitigate human rights risks in FY2024 and beyond.

This statement reflects our unwavering commitment to address Modern Slavery and outlines our position on this critical issue.





## EXECUTIVE STATEMENT

At The Transformation Group, we are committed to ethical business practices and respect for human rights. We acknowledge the global issue of Modern Slavery and are unwavering in our determination to eradicate it from our operations and supply chains. We believe that modern slavery has no place in our business or industry, and we are committed to respecting the human rights of those who work across our operations and supply chains. We will continually evolve our approach to managing human rights risks, including modern slavery. As a leader in our industry, we believe it is our responsibility to ensure we are mitigating these risks and leveraging our global influence to reflect this across our entire value chain and broader industry.

## OUR POSITION AND APPROACH TO MODERN SLAVERY

**At The Transformation Group, we are acutely aware of the global issue of Modern Slavery, a heinous crime that tragically strips individuals of their fundamental rights, including liberty and dignity, for the benefit of others. This grave violation affects millions of people worldwide, even within developed countries, where individuals are exploited through various forms of slavery, such as forced labour, human trafficking, and child labour. TTG condemns all manifestations of modern slavery, recognising that every person has the inherent right to work freely in a safe and dignified environment, free from coercion and human rights violations.**

Understanding the pervasive threat modern slavery poses to society and our global community, we affirm our unwavering commitment to eradicating this crime in all its forms. At TTG, we maintain a zero-tolerance stance against modern slavery and are dedicated to preventing human trafficking, slavery, and related practices within our operations and supply chain. Our proactive monitoring and meaningful steps underscore our commitment to combat modern slavery, acknowledging the potential risks that every company faces in its own operations and supply chain.

In the event that we identify or become aware of any unlawful activity related to modern slavery, we pledge to take swift and decisive action against the perpetrators. Additionally, we commit to promptly reporting such incidents to the relevant authorities. Through these proactive measures, we aim to contribute to the broader efforts in combating modern slavery, promoting a workplace and supply chain that upholds the principles of freedom, dignity, and human rights for all.

## REPORTING ENTITY

The reporting entity for the purposes of this statement is The Transformation Group. While TTG and its controlled entities had consolidated revenue of more than \$100 million (AUD) for the reporting period, TTG's controlled entities do not meet the threshold for mandatory reporting on an individual basis and are not reporting entities in their own right.



# OUR BUSINESS & SUPPLY CHAINS

BUSINESS NAME	ABN	SERVICE DELIVERY LOCATION
The Transformation Group	53 634 381 490	Australia, Philippines
Talenza Pty Ltd	51 615 432 703	New South Wales, Australian Capital Territory, South Australia
Talenza Qld Pty Ltd	75 634 418 465	Queensland, Tasmania
Talenza Vic Pty Ltd	48 659 851 135	Victoria
Tranzformd Pty Ltd	99 646 384 778	Australia, Philippines, India



## RISK ASSESSMENT

At The Transformation Group we take a holistic and practical approach to understanding and managing risk across our business functions. Some of the factors we consider include:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers.
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups
- Supplier self-assessment Modern Slavery checklist

Using our approach to managing and monitoring risks we have remained compliant with our oversight and protection obligations. To date we have not been made aware of any allegations of human trafficking or slavery activities against any of our suppliers or within our supply chain.



## POLICIES

The Transformation Group operates the following policies for identifying and preventing slavery and human trafficking in our operations:

POLICY	DESCRIPTION
Whistleblowing Policy	We encourage all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
Employee Code of Conduct	Our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
Supplier Code of Conduct	We have updated our Supplier Code of Conduct and supplier contracts to make explicit reference to slavery and human trafficking.
Modern Slavery Policy	A policy which establishes internal obligations on staff and suppliers pertaining to the core features of this statement.
Anti-bribery and Corruption Policy	This policy prohibits bribery and related corrupt activities and includes safeguards designed to detect and prevent bribery and corruption and to ensure compliance with regulatory requirements.
Diversity & Inclusion Policy	We recognise the power of diversity and inclusion to drive innovation, collaboration, and business outcomes. We believe our vision of Leading for Inclusion fosters an inclusive culture which can help our people being empowered to take an active approach to tackling the risks of modern slavery concerns across our operations.





## SUPPLIER DUE DILIGENCE

To ensure we can complete the appropriate due diligence process we actively build relationships of trust and integrity with our suppliers. We believe that it is important that everyone join us in addressing the issue of Modern Slavery and Human Trafficking.

Our supplier selection and on-boarding procedure includes due diligence checks on the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

Our ongoing compliance program establishes a practice of reviews at regular intervals. During these reviews we collaboratively explore the supplier's ongoing business practices and ensure that:

- They don't use any form of forced compulsory or slave labour.
- Their employees work voluntarily and are entitled to leave work.
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment.
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons.
- They don't require employees to surrender their passports or visa's as a condition of employment.

We understand that Modern Slavery can take many forms, so we believe it is important to be collaborative and informed of developments and practices adopted by other companies and partners.

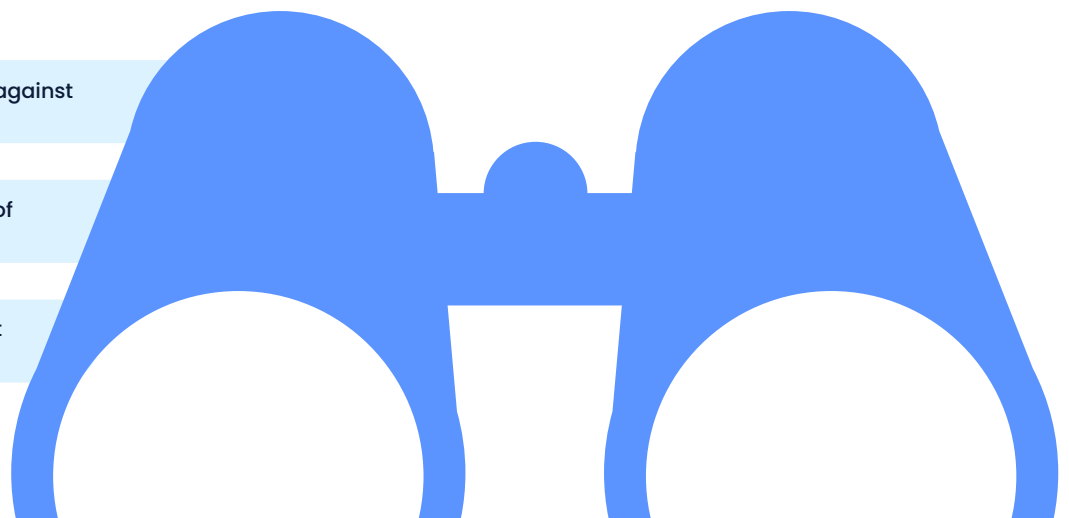
## AWARENESS

The Transformation Group has raised awareness of Modern Slavery issues by putting up posters across our facilities and sending an email that is focused specifically on Modern Slavery to all our staff, which explains:

Our commitment in the fight against Modern Slavery

Red flags for potential cases of slavery or human trafficking

How employees should report suspicions of modern slavery



# TRAINING

The Transformation Group provides training to its staff which covers:

01

Various forms of Modern Slavery in which people can be held and exploited;

02

The size of the problem and the risk to our organisation;

03

How employees can identify the signs of slavery, slavery like practices and human trafficking

04

How employees should respond if they suspect slavery or human trafficking;

05

How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation;

06

The external supports are available for the victims of slavery and slavery like practice;

07

What terms and guidance should be provided to suppliers in relation to Modern Slavery policies and controls;

08

What steps The Transformation Group will take if a supplier fails to implement appropriate Modern Slavery policies or controls;

09

An attestation from employees that they will abide by The Transformation Group's Modern Slavery Policy.

# MEASURING HOW WE'RE PERFORMING

The Transformation Group has defined a set of key performance indicators and controls to combat Modern Slavery and human trafficking across in our business and within our supply chain. These include:

- How many employees have completed mandatory training?
- How many suppliers have filled out our ethics questionnaire?
- How many suppliers have rolled out an awareness and training programme that is equivalent to ours?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?
- What are the findings of our cross-functional Human Rights team, which reviews how we are addressing Modern Slavery and human trafficking?

The Transformation Group is resolute in its stance against modern slavery. We consider the eradication of this heinous crime not only a legal obligation but a moral imperative. We are dedicated to maintaining the highest ethical standards in our operations and supply chains, and we will actively work towards a world free of modern slavery.

