



ALLEGIS
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Modern Slavery Statement

Reporting Period: 2020



Introduction

This joint statement on modern slavery ('Statement') is made by Allegis Group APAC Holdings Pty Ltd (ACN 159 406 523), pursuant to sections 14 and 16 of the Modern Slavery Act 2018 (Cth) ('the Act') for the financial year ending 31 December 2020, and covers Allegis Group Australia Pty Ltd (ACN 105 143 324) ('Allegis Group', 'we', 'our', or 'us').

This Statement addresses Allegis Group's obligations and compliance in relation to the Act and applicable state legislation, and highlights the steps we take to ensure there is no incidence of modern slavery or human trafficking within Allegis Group or our supply chains.

Allegis Group is opposed to human rights abuses in all our operations – whether direct, indirect, or in our supply chain. We are committed to continuously improving our practices to combat modern slavery and human trafficking, to ensure that these do not take place in any part of our business or supply chains. Allegis Group strives to conduct all our business in an honest and ethical manner and in accordance with the letter and spirit of applicable legal and regulatory requirements in the jurisdictions in which we carry out our operations.

Our Structure & Operations

Allegis Group APAC Holdings Pty Ltd is a wholly owned subsidiary of Allegis Group Inc., a privately held US company. Allegis Group Australia Pty Ltd is a majority owned subsidiary of Allegis Group APAC Holdings Pty Ltd and is also a reporting entity for the purposes of the Act. The information set out in this Statement also covers our operational entities in Australia, China, Hong Kong SAR, Japan, Malaysia, New Zealand, Philippines, Singapore, and Thailand. A list of these entities is included in Appendix 1 to this Statement.

Allegis Group provides both permanent and contract-based resources, offering specialized and client focused staffing solutions and consulting services to a wide range of household names and smaller businesses.

Allegis Group goes to market with a range of brands including Aston Carter, TEKsystems, Aerotek, and Allegis Global Solutions which enable us to offer a broad selection of staffing and services solutions across different industries including Government Services, Financial Services, and Information Technology. We have over 1,200 internal employees across the region operating from offices across Asia Pacific. This excludes individuals who are assigned to our clients.

Our Supply Chains

Our supply chain includes the sourcing of candidates for onward supply to our clients predominantly in the Government Services, Financial Services, and Information Technology sectors. We expect our suppliers and potential suppliers to operate in an ethical, legally compliant, and professional manner. We also expect our suppliers to maintain the same standards in their inward supply chain. Our inward supply chain includes:

- Facilities Management
- Communications and IT services
- Office Equipment and Supplies
- Utility services
- Professional services such as lawyers, tax advisors etc.

Modern Slavery Risks

Allegis Group sources roles for and provides only white-collar workers to its clients. We do not provide blue-collar workers, nor do we routinely supply workers to high-risk sectors such as meat processing or cleaning and security. Therefore, we have assessed that there is a limited risk of modern slavery in our onward supply chain.

We consider the greatest risk of slavery and human trafficking exists in our inward supply chain where operations and management oversight are beyond our control.

We assess our risks based on below parameters:

Sector and industry risks

Some of the industries which are identified as having potential risks of modern slavery are meat processing, horticulture, and facility management. Our risk however is relatively limited since we do not routinely supply workers to these sectors. We only supply white collar workers to sectors (such as Government Services, Financial Services, Information Technology) where risks of modern slavery are relatively low.

Product and Services Risks

Products that have a higher element of risk include electronics, office supplies, and marketing materials. This is an indirect risk since we procure these products from our suppliers and not directly from the manufacturers. Services such as office security and cleaning also pose a modern slavery risk because these are mainly sourced from facility management vendors.

Geographic Risks

While there are some countries in our inward and outward supply chain that may exhibit a higher prevalence of modern slavery, the affected industries and products in these countries are limited to those identified above. We further mitigate this risk by a careful selection of clients and suppliers.

Entity Risks

We are currently not aware of any entity which we engage with, that poses any entity-specific modern slavery risks. We expect to identify such risks through the research and inquiries performed on clients and suppliers prior to engagement.

Action taken to address Modern Slavery Risks

Candidate engagement

We undertake thorough checks on all candidates before introducing them to clients to ensure that their identity and background are clearly established. For individuals, this includes verifying documentation such as passport, visa, and any documents evidencing their right to work in the relevant jurisdiction. For companies or firms, this includes checking documentation related to incorporation, insurance, and tax. We are also committed to compensating our candidates by at least meeting the relevant legal minimum standards.

Enforcement of Organisational Policies

Our relevant policies include:

- Global Code of Conduct for staff
- Supplier Code of Conduct
- Whistleblowing Procedure (including non-retaliation policy)

Our policies set out the behaviour we expect from employees, contractors, and vendors in their dealings with colleagues, customers, suppliers, government officials, agents etc. All staff are expected to act with integrity in accordance with the standards of behaviour set out in the Code of Conduct. We provide guidance and training to support employee understanding of expected behaviour, particularly in their business decisions. We pro-actively encourage stakeholders to report instances where they become aware of a situation that is not in accordance with Allegis Group's Global Code of Conduct, internal policies, or applicable law. All stakeholders have access to a 24x7 external hotline (phone and internet), and are encouraged to make use of this channel and others to report concerns at the earliest opportunity.

Cooperation with client due diligence

We cooperate with our clients' due diligence requirements or audits in relation to modern slavery related matters. We have also committed in our client contracts to specific obligations pertaining to prevention of modern slavery.

Supplier engagement

- We have internal questionnaires to verify the process and verification criteria used in the supplier screening process
- Research and inquiries made in respect of suppliers.
- Suppliers provided with the Allegis Supplier Code of Conduct
- Senior management approval is required for onboarding new vendors

Assessing the effectiveness of the steps taken

Allegis Group reviews the effectiveness of its processes on modern slavery as below:

Continuous engagement

Allegis Group engages continuously with its suppliers, contractors, and clients to ensure a healthy dialogue is in place that promotes continuous evolution in our processes against modern slavery.

Staying up to date

Allegis Group diligently observes global trends and events to assess the efficacy of our current processes and policies in mitigating new and emerging risks of modern slavery.

Maintain Labour Hire Licences in Australia

Allegis Group entities held labour hire licences in Queensland and Victoria during the reporting period. The broad objectives of the Australian labour hire licencing schemes are protecting workers from exploitation by labour hire providers and their clients to improve the transparency and integrity of the labour hire industry, and promoting responsible practices in the industry. Licence holders are required to meet strict fitness and propriety standards, compliance tests, as well as regular reporting requirements.

Consultation and Approval

Allegis Group created a taskforce comprised of members from different entities and functions to provide recommendations and advise on the preparation of this Statement, and actions to prevent modern slavery in our supply chains.

Further steps and Remediation

For the next reporting period, Allegis Group intends to:

- develop a pan-APAC due diligence questionnaire for suppliers
- provide suppliers with a copy of the Allegis Supplier Code of Conduct while onboarding them
- ensure that suppliers have acknowledged the Supplier Code of Conduct
- review supplier questionnaires to identify modern slavery risks present in Allegis Group's supply chain
- ensure that our inward supply contracts contain appropriate protections against modern slavery
- ensure that any supplier who is found to be involved in modern slavery practices is flagged and excluded from further work with Allegis Group
- set up an annual review process with members of senior management.

This Statement was approved by the boards of Allegis Group APAC Holdings Pty Ltd and Allegis Group Australia Pty Ltd on 24 June, 2021.



Helen Ahlstedt, Director
Authorized Representative

Date: 24 June, 2021

Appendix 1

List of Operational Entities in the Allegis Group APAC Region (as on 24 June, 2021)

- Allegis Global Solutions (Australia) Pty Ltd
- Allegis Group Australia Pty Ltd
- Allegis Talent Consultancy (Shanghai) Co. Ltd.
- Allegis Global Solutions (Hong Kong) Limited
- Allegis Group Hong Kong Limited
- Allegis Group Malaysia Sdn. Bhd.
- Allegis ICT Solutions Malaysia Sdn. Bhd.
- Allegis Group New Zealand Limited
- Allegis Global Solutions (Philippines) Corporation
- Allegis Global Solutions (Singapore) Pte Ltd.
- Allegis Group Singapore Pte Ltd
- Allegis Global Solutions (Thailand) Co. Ltd.
- Allegis Group Japan KK

