APS Group Modern Slavery Statement FY2020



LOYALTY - Demonstrating our commitment to others

DEPENDABILITY - Being flexible to fulfil what we agreed to do

APS Group (Holdings) Pty Ltd

SINCERITY - Using morals to guide our decisions

ABN 94 096 418 101

RESPONSIBILITY - Being diligent to do what is right

CREATIVITY - Using initiative to approach the needs of others from a new perspective

DETERMINATION - Being tenacious in pursuit of excellence

Introduction

The APS Group Directors and its Executives are committed to acting ethically and with integrity in all aspects of business and have a zero-tolerance approach to any form of modern slavery in its operations or supply chain. Modern slavery encompasses human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour. APS Group is a Character first company and we strive to achieve our goal to be the premier national supplier of staffing solutions by living our core values.

This is the first statement published by the APS Group and its subsidiaries, pursuant to the Australian Modern Slavery Act 2018 (Cth).

Structure and Operations

Australian Personnel Solutions (APS Group) was founded in 1993, initially providing industrial labour hire to a client base consisting predominantly of manufacturing and distribution operations. With its National Service Centre based in Melbourne, APS Group consists of its holding company and 6 subsidiary entities. These are as follows:

Entity Name	ABN
APS Group (Holdings) Pty Ltd	94 096 418 101
APS Group (Commercial) Pty Ltd	19 096 423 077
APS Group (Industrial) Pty Ltd	21 096 423 086
APS Group (Transport) Pty Ltd	15 096 423 059
APS Group (Placements) Pty Ltd	17 096 423 068
APS Group (Regional) Pty Ltd	70 095 534 795
APS Group (Girraween) Pty Ltd	65 075 049 419

APS Group is a privately owned labour hire and recruitment Company with up to 80 direct employees and up to 5,000 on hired employees servicing major national and small to medium size business's. Predominantly our clients operate within the warehousing & distribution industry, including but not limited to consumer goods, supermarkets, manufacturing, and retail. With branches in each mainland state of Australia, APS is able to nationally service five major sectors within the employment spectrum - Industrial, Transport, Retail, Commercial and Executive.

Supply Chain

An APS Group supply chain review was conducted with a focus on identifying risks that may cause or have the potential to cause modern slavery practices.

The review was conducted by an Executive member of the Group. The findings were then presented to the Directors and the rest of the Executive team.

The review revealed that the APS Group has a supply chain which is typically associated to suppliers of equipment generally used to support an office based workplace environment (Property and maintenance, IT equipment, phone/copiers, advertising and government agencies). APS Group's main suppliers are large national or multinational organisations that do not or are unlikely to create opportunities for modern slavery to develop. Many of these organisations have published their own Modern Slavery Statements which has re confirmed our beliefs and findings.

Identifying the risks

APS Group understands that there are risks of contributing or being associated to modern slavery through our supply chains.

Areas identified where some risk may exist within the APS Group supply chain is in the supply of uniforms, PPE equipment, security and cleaning contracts.

Actions taken

With a view of building awareness and understanding the risks of modern slavery within the APS Group supply chain and its operations, APS have developed a Modern Slavery Policy that applies to all persons working for or on behalf of the Company, including Directors, employees, officers, contractors, consultants and any other third-party.

APS Group is also a long standing corporate member of the Recruitment, Consulting and Staffing Association (RCSA). RCSA members are bound by a code of professional conduct which was authorised by the Australian Competition and Consumer Commission in 2019.

The code requires members to adopt values of personal professionalism and operational integrity which, amongst other things, require members to:

- protect work seekers from exploitation (including forms of modern slavery);
- conduct business in a way that avoids causing or contributing to exploitation through their activities;
- seek to prevent or mitigate risks of exploitation that are linked to their operations or services by their business relationships, even if they have not contributed to those risks

The code also includes serious breaches of the Fair Work Act 2009 (Cth) and unconscionable conduct within the meaning of the common law or Australian Consumer Law

APS Group holds Australian labour hire licences in all legally required jurisdiction.

The objectives of the Australian labour hire licensing schemes are to protect workers from exploitation by labour hire providers and their clients, to improve the transparency and integrity of the labour hire industry, and to promote responsible practices in the industry.

Licence holders are required to meet strict fit & proper person and compliance tests as well as regular reporting requirements

The APS Group intends to strengthen supplier commercial agreements prior to the next reporting period to ensure modern slavery is not infiltrating its supply chains or through any other business relationship

Managing the effectiveness of our actions

The APS Group recognises the importance of monitoring the effectiveness of its anti-modern slavery processes.

The effectiveness of these processes is assessed through regular internal and external audits and reporting requirements to ensure compliance is being met.

We shall continue to review our operations and supply chain to better assess the effectiveness of our actions to address modern slavery.

Consultation

The APS Group Executive Team and its Directors are the principal governing body responsible for all entities and business practices within the group. The risk of modern slavery in the group is mitigated by the governance of a single entity management structure, its policies, processes and culture.

This Statement is made pursuant to the Modern Slavery Act 2018 (Cth) and was approved by the Directors and the Executive team of APS Group, on the 11th March, 2021 at the company's monthly board meeting.

Lisa Richardson

CEO APS Group

Julian Barson

Director APS Group