



**Modern Slavery Policy  
Global**

March 2021

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# 1. The Quantum view

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## What it is ...

Quantum's commitment to limiting the risk of any form of modern slavery in its operations and supply chains

## What it means ...

Quantum will identify, assess, and manage modern slavery risks and has implemented a robust framework, with clearly defined accountabilities, to support that objective.

## Who it applies to ...

All employees globally, including direct or agency contractors and casual hires.

# 2. What is modern slavery?

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Modern slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom.

Practices that constitute modern slavery include:

- Human trafficking
- Slavery
- Servitude
- Forced labour
- Debt bondage

# 3. Policy

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Quantum operates in accordance with the principles of honesty and integrity and is committed to complying with all applicable human rights laws. Our Modern Slavery Policy prohibits any activity that could compromise those objectives. This zero-tolerance approach is also embedded in our company's DNA. Our expectations and standards are communicated to all third-party suppliers and contractors at the commencement of any business relationship.

The purpose of this policy is to:

- Describe what modern slavery is and how to identify when it is, or may be, occurring
- Convey Quantum's prohibition of all forms of modern slavery in our operations and supply chains
- Describe the framework Quantum has implemented to manage modern slavery risks
- Detail actions employees are required to take regarding modern slavery concerns
- Outline the consequences that may arise from any breach of this policy

## 4. Modern Slavery Statement

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Quantium is committed to operating its business lawfully and ethically and to only working with suppliers that are aligned to our values. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking, and child labour.

While Quantium's General Counsel has overall ownership and responsibility for compliance with this policy, every employee has a part to play.

### 4.1 Business structure

Established in 2002, Quantium is an Australian-formed, globally recognised leader in the development of data-driven insights and ideas.

Quantium Group is made up of the following entities:

#### Australia:

- The Quantium Group Holding Pty Limited
- Quantum Ventures Pty Limited
- The Quantium Group Pty Ltd
- Quantum Software Pty Ltd
- Market Blueprint Pty Limited
- Quantum Digital Pty Limited

#### India

- Quantum Analytics Private Limited

#### Hong Kong

- Quantum Hong Kong Limited
- Quantum Health HK Limited

#### New Zealand

- Quantum Group Pty Limited

#### South Africa

- Quantum South Africa (Pty) Ltd
- Quantum Health SA (joint venture)
- Quantum Health Pty Limited (joint venture)
- Health Outcomes Australia Pty Ltd

#### United Kingdom

- Quantum Limited

#### United States

- Quantum Inc.

### 4.2 Business activities

Quantium provides insights into the rapidly changing needs and preferences of consumers and generates ideas as to how brands can engage customers and create new and sustainable sources of competitive advantage. Using data, analytics, and technology, Quantium has enabled many of the world's most progressive businesses to capitalise on the value of their data by leveraging unique data assets, analytical skills, and software development capabilities.

The activities undertaken in the locations in which we operates are summarised below:

- Auckland (NZ) Sales & Consulting
- Bentonville (US) Sales & Consulting
- Brisbane (AU) Sales & Consulting
- Canberra (AU) Sales & Consulting
- Chicago (US) Sales & Consulting
- Hong Kong (CN-HK) Sales & Consulting
- Hyderabad (IN) Operations Support, Product Development
- Johannesburg (ZA) Product Development, Sales & Consulting
- London (UK) Sales & Consulting
- Melbourne (AU) Operations Support, Sales & Consulting
- San Francisco (US) Product Development, Sales & Consulting
- Sydney (AU) Business and Technology Operations, Product Development, Sales & Consulting.

### 4.3 Supply chain

Quantium engages with, and relies upon, a relatively straightforward network of suppliers. As part of our risk management framework, we perform reviews prior to working with new suppliers through a central procurement function in Australia. These reviews involve prospective suppliers completing Quantum's Supplier Questionnaire, with sections dedicated to the prospective supplier's approach to addressing modern slavery risks in their supply chains and operations. Quantum's Procurement Team assesses completed supplier questionnaires and reviews relevant documentation provided in support of the prospective supplier's responses (e.g., policies, training materials, process diagrams). The assessment will have one of two possible outcomes:

#### 4.3.1 Supplier is onboarded:

Where the prospective supplier can demonstrate the operation of a framework to effectively address modern slavery risks in their supply chains and operations (as well as satisfactorily answering all other sections of the Supplier Questionnaire), they are onboarded as a supplier to Quantum

#### 4.3.2 Further consultation takes place between the prospective supplier and Quantum

Where the prospective supplier cannot demonstrate the operation of a framework to effectively address modern slavery risks in their supply chains and operations (or hasn't satisfactorily answered all other sections of the Supplier Questionnaire) Quantum's Procurement Team will engage the prospective supplier to assist them in uplifting their approach to modern slavery risks (or any other relevant area of the Supplier Questionnaire). Where this engagement takes place, a subsequent review is conducted, and the prospective supplier is either onboarded (in the case the required uplift has demonstrably occurred) or rejected (in the case the required uplift has not demonstrably occurred). Where attempts to engage the prospective supplier are unsuccessful, the prospective supplier is rejected.

Outcomes of the review process and analysis of supporting documentation are recorded in a central database to assist in regular supplier reviews and to transparently record Quantum's decision-making process.

Suppliers can be categorised in terms of the types of services/goods offered and the business unit(s) they support. Most supplier categories are listed below.

- Data partners
- Data centre provider
- IT infrastructure
- Software
- Cloud services
- IT Hardware
- Commercial real estate
- Office supplies
- Office-related services (e.g., cleaning)
- Corporate merchandise
- Legal firms
- Marketing agencies
- Employee training and development
- Recruitment services

Quantum works proactively to reduce modern slavery within its supply chain and operations and expects all organisations it engages with to do the same. If a supplier identifies a situation, or material risk, of modern slavery in its supply chains or operations, they are expected to take effective steps to address this. They should also notify Quantum as soon as possible and, where required, also the relevant authorities.

#### **4.4 Operations**

Quantum employs the highest pedigree of expertise across data, analytics, technology, and media to both help organisations make the most out of their data and capitalise on our range of unique data sources. Analysis is always connected to tangible commercial outcomes, using sophisticated processes to profile and predict customer behaviour and response.

The majority of Quantum team members are employed directly and on permanent contracts. This lowers modern slavery risks within our direct team. Where team members are recruited via third parties it is only through trusted partners which have been subject to our supplier onboarding process. We do not employ, either directly or via third parties, anyone in the high-risk industries identified in the [Global Slavery Index](#) (e.g., the fishing industry and cocoa agriculture).

#### **4.5 Risk identification framework**

Steps taken include:

##### **4.5.1 An assessment of potential modern slavery risks in our operations and supply chains, with an emphasis on high-risk geographical locations and industries.**

Our assessment identified that the most significant risk of modern slavery exists in our procurement of corporate merchandise due to the opaque nature of supply chains and the potential for materials to be sourced from locations with a high risk of modern slavery.

##### **4.5.2 Steps to address any potential modern slavery risks identified**

As a result of our assessment, we undertook further analysis of the suppliers we work with in this category. We gained satisfactory evidence from the majority and ceased our engagement with one.

##### **4.5.3 A review of relevant existing company policies and frameworks, including Code of Conduct and Procurement, to ensure robust controls are in place to minimise modern slavery risks**

Relevant policies and frameworks set out the high standards of legal and ethical decision making and conduct Quantum requires of its employees. These policies and frameworks are available to all employees and include reporting and accountability provisions, as well as providing protection against retaliation for anyone who reports wrongdoing.

##### **4.5.4 A commitment to applying a continual improvement approach to reducing the risk of modern slavery practices within our supply chains and operations.**

Quantum recognises that effective management of modern slavery risks requires frequent analysis and improvement of existing processes and frameworks. We're committed to consistently developing our ways of working to minimise modern slavery risk in our supply chains and operations.

##### **4.5.5 A review of supplier contracts to ensure they contain terms that are consistent with modern slavery legislation**

We have ensured expectations around modern slavery risk are incorporated into our interactions with both new and existing suppliers.

#### **4.6 Next steps**

##### **4.6.1 The development of employee awareness training and communications**

This is vital to increase understanding of this Policy, our approach to limiting the risk of modern slavery within our supply chains and operations, and the role employees play.

##### **4.6.2 The implementation of a program to measure effectiveness through performance monitoring**

Aligned to Quantum's continual improvement approach, we will ensure the ongoing effectiveness of our framework is measured, and appropriate action is taken in response to any identified deficiencies.

## 5. Policy breaches

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Quantum expects that anyone engaged in conducting Quantum business will always act and behave appropriately, in line with this Policy.

Should you become aware of a situation which you feel is in breach of this Policy, Quantum requires that you notify either your people leader, a member of the Group Executive, General Counsel, Executive Manager Risk & Compliance or People and Culture as soon as possible. Suspected breaches can also be raised via the process outlined in the [Whistleblowing Policy](#). In a situation where you are in doubt as to whether or not a situation is in breach of this Policy, you should still raise this for further review.

Where a possible breach is notified, it will be treated in the strictest of confidence and further communication will be on a 'need-to-know' basis. Retaliation for coming forward with information regarding a possible breach in good faith is prohibited under law and Quantum policy.

Any breaches of this policy, or fraudulent claims will be viewed very seriously by Quantum and may result in disciplinary action in accordance with Quantum's [Disciplinary Guidelines](#), up to and including termination of employment.

## 6. Relevant legislation

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On 1 January 2019 the Modern Slavery Act 2018 (Cth) ('Act') commenced operation in Australia. Under the Act Quantum is subject to statutory requirements to report on the risks of modern slavery in its operations and supply chains and to outline the steps taken in response to those risks. The Act requires Quantum to produce an annual Modern Slavery Statement. Our first annual statement is due for submission by 31 March 2021 and is included in section 4 of this Policy.

Similarly, Quantum is required to produce an annual slavery and human trafficking statement under the UK's Modern Slavery Act 2015. This statement is due for submission by 30 September 2021 and will cover the period April 2020 – March 2021.

Country	Legislation
Australia	Modern Slavery Act 2018
United Kingdom	Modern Slavery Act 2015
USA	California Transparency in Supply Chains Act 2010

## 7. Questions / further information

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If you have any questions or require further information on how to comply with this Policy, please contact the General Counsel of the Quantum Group or the Executive Manager, Risk & Compliance.

## 8. Definitions

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Term	Definition
Debt bondage	Where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt.
Forced labour	Where the victim is either not free to stop working or not free to leave their place of work.
Human trafficking	The recruitment, harbouring and movement of a person for the purposes of exploitation.
Servitude	Where the victim's personal freedom is significantly restricted.

Slavery	Where the offender exercises powers of ownership over the victim.
Supplier	Any organisation or person who provides Quantum with goods or services, including their subcontractors, agents, related entities and consultants.
Supply Chain	Product and services (including labour) that contribute to Quantum's own product and services including product and services sourced globally and beyond direct suppliers.

## 9. Other relevant policies

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[Code of Conduct](#)

[Performance Improvement & Disciplinary Guidelines](#)

[Whistleblowing](#)

[Procurement Policy](#)

## 10. Document management

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Owner	Quantum CEO	Published on	March 2021
Authoriser	Quantum Board of Directors	Next scheduled review date	September 2021