

# MAX Modern Slavery Statement

March 2023

# MAX at a glance

As one of the best credentialed employment services provider in the country, MAX is proud to support thousands of Australians each and every day.

MAX works closely with more than 30,000 Australian employers, as well as government and key stakeholders, to deliver individualised employment, health and training services through more than 200 full time, part time and outreach offices.

After more than two decades of operating in Australia, our teams around the country have a deep connection to the local communities they serve. As part of Maximus, we are also able to draw on global best practice, world-leading technology, and insight to create life-changing opportunities for our customers.

## Our vision

To be the recognised leader in training, health and human services, giving every person every chance.

## Our values

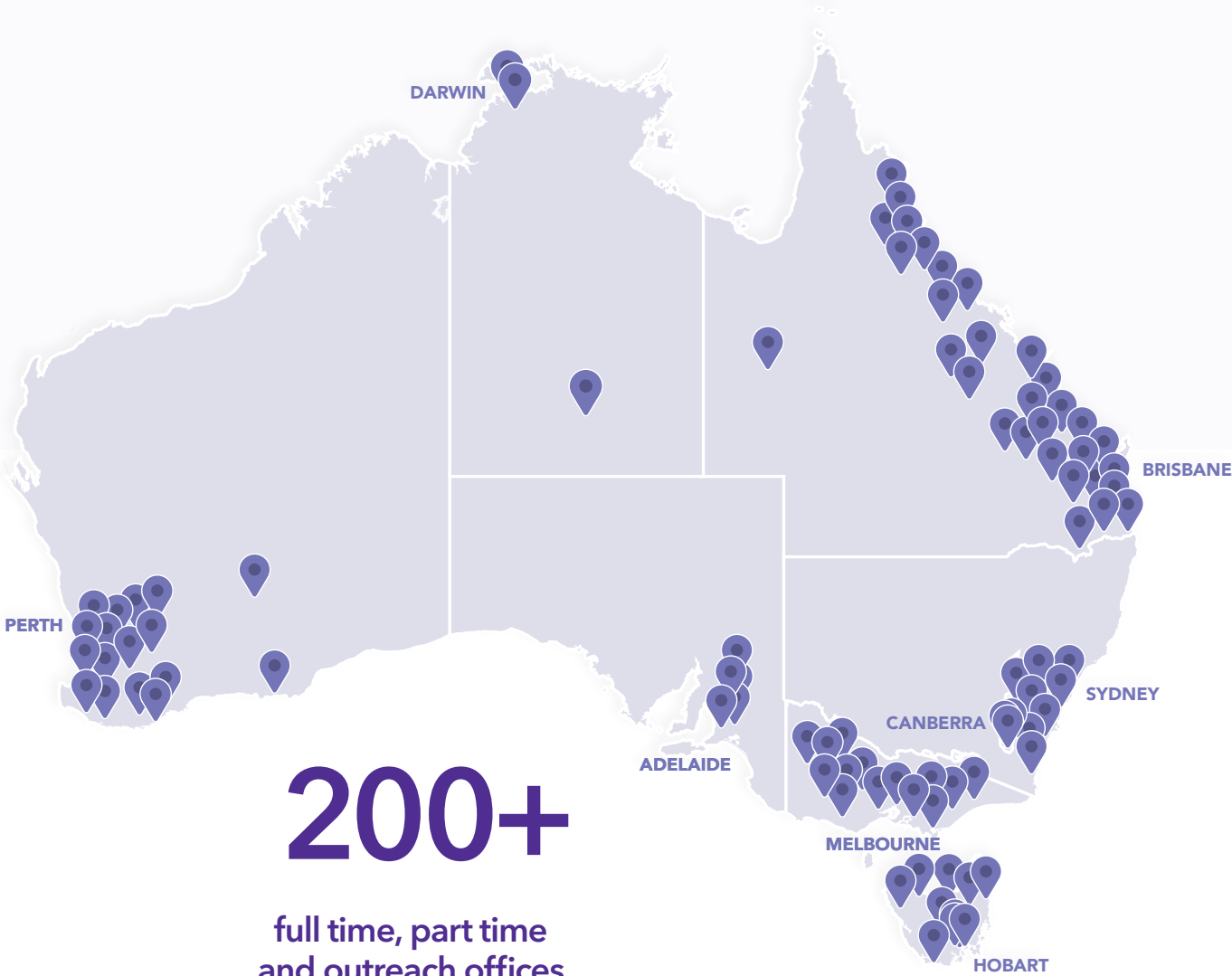
Our values help define who we are as an organisation and they are key to our long-term success. At MAX, we believe every person has the right to opportunity

Our services help people see a different future for themselves. By understanding the individual needs of our customers, we can provide the right support to help get them there. It is our passion, our spark, that drives us to make the most of every opportunity, connect with people, and have a positive impact on our community.



# Delivering opportunity across Australia

We work across Australia with employers, community partners, support organisations and our customers. By working together, we help people see a different future for themselves. We are proud to live in, and be part of, the communities that we serve in every state and territory in Australia.



# MAX Modern Slavery Statement

This statement discloses the activities of MAX ABN 51067092737 and its controlled entities to understand and implement actions to minimise the risk of modern slavery and human trafficking in our operations and supply chain. This statement is aligned with the annual reporting requirements of the Australian Government's *Modern Slavery Act 2018* and this annual statement takes international financial year timelines into consideration.

No Modern Slavery Act violations have been detected and/or reported to MAX in the most recent reporting period.

## Introduction

The purpose of this statement is to outline MAX's approach to ensuring that we have robust frameworks and processes embedded in the organisation to minimise the risk of modern slavery in our business operations and supply chain.

At MAX, we recognise that slavery and human trafficking can occur in many forms, as considered within the Act. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour or services.

MAX is fully committed to operating responsibly, establishing and adhering to the highest ethical standards. We will not tolerate any forms of slavery or human trafficking in our business including all business partners and suppliers we receive goods and services from.

MAX is committed to continuous improvement in this area and the need to keep ahead of current and emerging risks faced by our organisation and the broader community.

MAX will also ensure the experience and best practice of other organisations, demonstrated through their annual statements, is identified and where relevant adopted within MAX operations.

MAX has also taken the opportunity to keep abreast of the various publications and general resources made available on the Australian Border Force portal including the publication of the Commonwealth Modern Slavery Statement 2021-22 back in December 2022.

## Our business

**MAX has more than 1,250 employees spread over more than 200 locations, including outreach locations in every state and territory in Australia.**

MAX works with employers as well as state and federal governments and agencies to deliver 24 programs and services including Disability Employment Services (DES) and Workforce Australia. Our business and community connections are at the core of how we link our customers to a wide range of jobs across multiple industries.

MAX also operates as a national Registered Training Organisation RTO: 0667, providing vocational and non-vocational courses. MAX has also recently expanded its registered training operation and acquired Stirling Institute of Australia RTO: 21132.

Our multidisciplinary team of registered allied health professionals offer a range of health services to individuals and organisations to improve workplace productivity.

We also provide services through our workplace medical services business Injurynet, aimed at preventing and reducing the impact of injury and illness in workplaces and the community. Injurynet works with a number of large national organisations in a range of industries and have the largest network of GP clinics in Australia.

As part of Maximus, we combine local knowledge and connection with global best practice to deliver high quality services to underserved populations.

# Our structure, operations and supply chain

This statement covers the activities of MAX and its associated entities:

- > **MAX Solutions Pty Ltd**  
ABN 51 067 092 737
- > **Assessment Australia**  
ABN 51 067 092 737
- > **Asymmetrics Pty Ltd**  
ABN 59 106 791 299
- > **Child Welfare Assessments Pty Ltd**  
ABN 33 153 700 648
- > **Aged Care Assessments Pty Ltd**  
ABN 88 154 304 766
- > **Injurnet Australia Pty Ltd**  
ABN 37 105 352 501
- > **Maximus Australia Holding Company Pty Ltd**  
ABN 91 608 016 128
- > **MAX Foundation Pty Ltd**  
ABN 13 964 825 520
- > **Stirling Institute of Australia Pty Ltd**  
ABN 24 096 470 021

The MAX Procurement Policy and Procedure sets out our intention to ensure that all MAX procurement activity is conducted with the highest ethical standards to:

- > Increase the accountability of all staff throughout a procurement process
- > Implement a risk-based management approach to expenditure activities
- > Provide greater transparency to delegates and the Senior Executive
- > Ensure compliance with all mandatory regulatory reporting including (but not limited to) Sarbanes Oxley Auditing requirements.

The policy sets out our requirements under the *Modern Slavery Act 2018* (Cth) and our expectations for our contractors to meet these too.

## The policy requires contractors to:

- a) investigate the risk of modern slavery within its operations and those of its supply chain;
- b) assess and address risks regarding modern slavery, including implementing appropriate due diligence and remediation programs;
- c) notify MAX as soon as possible of any confirmed instances of modern slavery and the actions undertaken by the contractor to remedy the issue;
- d) have all the necessary processes, procedures, investigations and compliance systems in place to undertake the actions in (a) - (c);
- e) upon request, provide evidence to the satisfaction of MAX which validates the contractor's compliance with this clause; and
- f) include a clause similar to this clause in all contracts it enters into with its suppliers.

In the event that the contractor does not remedy and/or provide an acceptable plan to remedy any identified instances of modern slavery within the timeframe specified by MAX, we reserve the right to terminate our agreement. Our organisation holds quality certification with ISO 9001:2015 and has maintained that or the equivalent standard since 2003. MAX also maintains certifications and accreditation with a range of other standards and other regulatory body requirements supported by internal audit and Quality Assurance teams.

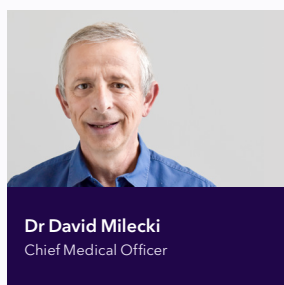
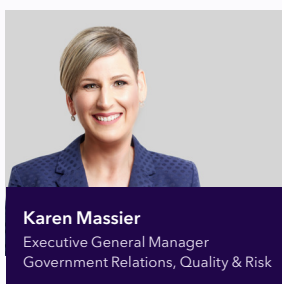
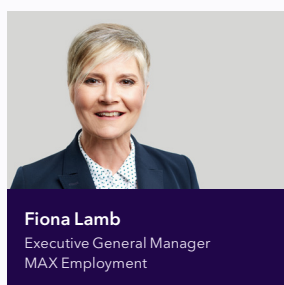
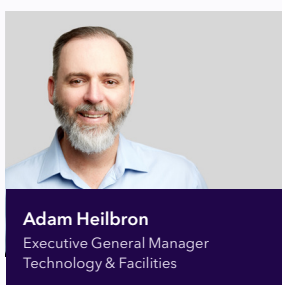
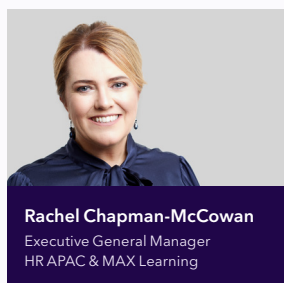


# Leadership and governance

## Executive team

Led by Country Manager, Darren Hooper, the Executive Team at MAX is passionate about the needs of customers and delivering high-quality services.

The team has extensive experience in the human services sector, with expertise in program management, risk management, quality and compliance, social policy development, change management, workforce development, government relations, service delivery and technology.



# Potential risks in our operations and supply chains

In late 2019, MAX commenced their review of modern slavery practices across the operations of our entities. Using our existing risk management framework, this analysis will continue on an ongoing basis.

During this assessment process MAX has focused on risks that cause and/or possibly contribute to potential violations of modern slavery practices. We have done so in consideration of the Australian Government's Department of Home Affairs Guidance for Reporting Entities in conjunction with the various associated resources made available on the Australian Border Force portal.

In the reporting period MAX have continued to engage with suppliers from a range of industry sectors and note that over 25% are categorised as small business. We are cognisant of the fact that the Australian Border Force indicator of modern slavery practices risks are more prevalent in certain sectors such as cleaning, hospitality, agriculture, textiles production and some types of manufacturing. These industry types are not prominent in our procurement, however we apply additional focus to these suppliers. In our review of the MAX's supply chains, we have also taken the product types and country of origin specifications into consideration. This has not highlighted any areas of immediate concern but is monitored on an ongoing basis.

During the reporting period our review of potential risks has found negligible risk, which can be attributed to the strength of internal processes, overarching governance measures in conjunction with ongoing external review with ISO, Sarbanes Oxley requirements and the established legislative and ethical framework we are committed to.

This review of potential risks in our operations and supply chains is part of ongoing business processes for MAX.

# Our approach

**At MAX, we are committed to approaching every aspect of our business operations with respect, integrity and accountability.**

This is especially so with respect to our employees, contractors, customers and all key stakeholders. We have a range of policies which have undergone review to reflect our zero-tolerance approach to modern slavery and to provide legally compliant and ethical company-wide conduct. Our Whistleblower Policy, Human Rights Policy and Procurement Policy and Procedures provide information ensuring our staff, contractors and customers are not exposed to human rights violations, including modern slavery. These key documents have been reviewed and updated as required.

Our procedural controls are reviewed regularly to ensure MAX and its various entities have robust processes in place to minimise the risk of modern slavery in our operations and supply chain. Our organisation holds quality certification with ISO 9001:2015 and has maintained that or the equivalent standard since 2003. MAX also maintains certification with a range of other standards and other regulatory body requirements supported by internal audit and Quality Assurance teams.

## Our policies and procedures

**The Whistleblower Policy gives special protections to stakeholders who make disclosures about misconduct, breaches of any laws or general wrongdoing by the company. It also provides detail of how to report various issues including suspected modern slavery violations.**

All procurement governance arrangements are overseen by the MAX Executive Board consisting of the Country Manager and Executive General Managers. Business areas are responsible for developing detailed budgets including an overview of the return on investment for submission to the Board for consideration.

### The key elements considered are:

- Alignment with company strategic objectives and business area priorities,
- Understanding of the procurement purpose through key stakeholder consultation and collaboration,
- Expectations of procurement are agreed to and managed through effective procurement governance,
- Delivery of goods and services that are fit for purpose and delivered within the time, budget and to the quality expected,
- The Procurement contributes to enhancing the organisational capability and capacity of MAX as a leader in the Employment and Human Services sector,
- A risk management-based approach to procurement activities is implemented to ensure regulatory compliance; and
- Accountability of all MAX employees involved in procurement activities.

Approved procurement activities are managed by the responsible business area and progress is regularly reported back to the Board through standard operational reporting mechanisms.

MAX has a strong commitment to abide by the general requirements of the Modern Slavery Act 2018 (Cth) ('Act') and to promptly report any such infringement to the regulator.

Consistent with these requirements our vendor agreements negotiated with external parties have been remodeled and now incorporate requirements to comply with the Modern Slavery Act 2018.

All remittance advices issued to suppliers contain the following advice which incorporates a live link to the Modern Slavery Act 2018 legislation: "To assist MAX Solutions Pty Ltd with Modern Slavery Act 2018 compliance and our annual reporting obligations please promptly report any suspected violation(s) to [probity@maxsolutions.com.au](mailto:probity@maxsolutions.com.au). We appreciate your assistance with these important matters."

# Addressing the risk of modern slavery practices

We have incorporated mitigations to the various risks of modern slavery practices in our group compliance framework and assurance processes. This ensures that our organisation has robust and effective processes that are firmly embedded in our business.

Our key actions to date can be summarised as;

## Policy

- Existing policies such as Whistleblower Policy and Human Rights Policy contain appropriate coverage and representation for staff and others within the supply chain.
- Documentation such as the Procurement Policy & Procedures with a specific focus of protecting labour standards for entities and others within the supply chain has been updated.
- The organisation's existing Recruitment and Selection Policy and Procedure ensure that 'Right to Work' entitlements are clearly stipulated whilst also an active part of established practices undertaken by all recruitment staff.

## Leadership & Governance

- Modern Slavery Act 2018 requirements and associated reporting responsibilities have been tabled at Executive Board meetings and the Executive General Manager Government Relations, Quality & Risk provides regular updates.
- Analysis has been undertaken on the various suppliers that MAX utilises and monitoring continues to ensure there are no future risks.
- Whistleblowing Policy and other mediums such as staff training modules and various communications have reinforced the method of reporting and examples of the types of concerns and/or violations which constitute a reportable event.
- Modern slavery compliance is included as a regular item of the Compliance Report tabled by General Manager at the quarterly Audit Risk Committee Meetings attended by the Country Manager and other Executive Board members.

## People & Recruitment

- Staff awareness remains a key focus with a range of internal communications incorporating all staff bulletins, manager meetings and follow up briefing notes, monthly newsletters and other operational updates. Modern slavery is a key part of onboarding training undertaken by all new hires and annual refreshers undertaken by all existing staff.
- Ongoing communications have also included guidance on how to recognise modern slavery practices and highlighted the fact that Australia is not immune to such violations.

## Risk & Opportunity Assessment

- A detailed analysis of the MAX organisation as well as the corresponding supply chain has been undertaken. Whilst there are no immediate issues identified and results provide negligible risk, we recognise the importance of maintaining this ongoing scrutiny of all facets of our business.
- A log has been established as a record of reported concerns, escalated issues and actual violations and this is maintained by the General Manager Quality & Ethics who also serves as the organisations Probity and Whistleblower official. A status report of this log and other matters relating to modern slavery are tabled as a key part of the Compliance Report during the quarterly Audit Risk Committee meeting(s).



## Measurement

- > Whilst analysis of the supply chain has been undertaken in respect to risk in the modern slavery environment, it has also identified areas for improvement in respect to systems to support the overall monitoring. Details of the current development work is noted within the following future commitments section.
- > As previously highlighted, in terms of measurement, a log has been established as a record of reported concerns, escalated issued and actual violations. A status report is tabled as a key part of the Compliance Report during the quarterly Audit Risk Committee meeting(s).
- > In respect to the measurement of MAX overall approach in addressing the risk of modern slavery our policy and procedures are externally reviewed as a part of the organisation's certification with ISO 9001:2015. The next external surveillance audit is to be conducted in late June 2023.

## External Engagement

- > MAX has taken the opportunity to communicate requirements of the Modern Slavery Act 2018 with supplier and general stakeholders. As also highlighted previously these requirements and MAX overarching responsibilities are also incorporated in all contract agreements.
- > Implementation of standardised messaging on all remittance advices issued to supply chain and service providers reminding them of the Modern Slavery Act, MAX reporting responsibilities and also promote the manner such reporting is undertaken.
- > Business development and planning for future potential involvement with new or extended contracts are conducted with consideration of the requirements of the Act. As a part of this process details of the modern slavery requirements are shared with external stakeholders to assist overall understanding and allow identification of unacceptable risk.

# Ongoing commitments

## Key focus areas for MAX include:

- > Ongoing refinement of our risk-related policies and governance control measures,
- > Continuing awareness training sessions to staff - both new hires and existing staff,
- > Incorporating requirements into existing assurance processes ensuring that our approach is continuously reviewed with independent external oversight,
- > Ongoing review of all Annual Statement submissions as provided on the Australian Border Force portal with the view to ensuring that best practice and key learnings from other organisations are considered for possible implementation,
- > Maintenance of new Contracts Management and Finance system providing risk analysis and improved reporting capability,
- > Ongoing communication to supply chain and contractors in addition to the continuation of staff awareness programs,
- > Continuing to prioritise surveillance of modern slavery, human trafficking and other elements presenting risk.

This statement was approved by the members of the board of MAX Solutions Pty Ltd in their capacity as principal governing body of Maximus Australia Holding Company Pty Ltd and their subsidiaries on 17th March 2023.



**Darren Hooper**  
Country Manager