

APM GROUP'S MODERN SLAVERY STATEMENT

Reporting period 1 July 2019 to 30 June 2020



The reporting entity

This Modern Slavery Statement is a joint statement made on behalf of APM Human Services International Pty Ltd (ACN 639 621 766) ("APMHSI") and all of its controlled subsidiaries around the world ("APM Group"). APMHSI is a company incorporated in Australia.

APM Group's structure, operations and supply chains

APM Group's head office is at 58 Ord Street, West Perth, Western Australia, 6005. We employ more than 7,000 team members in total locally and around the world.

APM Group is a human services organisation delivering a wide range of services and programs to enable better lives. We operate in 10 countries: Australia, New Zealand, the United Kingdom ("UK"), Spain, Germany, Switzerland, South Korea, Singapore, Canada and the United States of America ("USA"). Our most significant operations are in Australia and the UK.

Our services globally include:

- Employability services
- Outplacement services
- Assessment services
- Disability services
- Injury prevention, management & vocational rehabilitation services
- Apprenticeships, skills & training services
- Health services
- Youth services
- Justice services
- Veterans services and
- Mental health services, including employee assistance programs.

Most of our services are provided to government customers, contracted services at national, state, province or local government level. Our government customers make these programs available to individuals who meet relevant access criteria and may benefit from them (Service Users). We also provide a range of bespoke training, health and wellbeing services to private and public sector entities.

APM trades under multiple brands, which are aligned either by country or for specific types of service delivery. During the reporting year, these included APM (Australia, New Zealand and UK), Ingeus (UK, South Korea, Spain, Germany, Switzerland, Singapore), Konekt (Australia), Assure (Australia and New Zealand), Communicorp (Australia), MCI (Australia), WCG (Canada), and Ross (USA). As at the date of this Statement, we also operate under the brands Grant Associates (USA), CiC (UK), and FBG Group (Australia).

For the Financial Year 2019-2020 we obtained goods and services from approximately 4,800 suppliers in Australia alone associated with property, insurance, motor vehicle leasing, cleaning, recruitment, communications, consumables, training and health providers, and consultants. Globally, there are significantly more suppliers. Most of our services are delivered either face to face, or via digital platforms by staff located in the same country as our Service Users. APM Group has a property footprint of more than 750 sites globally.



APM GROUP'S MODERN SLAVERY STATEMENT

Reporting period 1 July 2019 to 30 June 2020



Our supply chain comprises of the following main categories: sole traders, entities such as partnerships, companies and non-government organisations and other suppliers of products and services. Almost universally we acquire products and services locally in country, although our suppliers for IT equipment or office supplies (in particular) may acquire those products internationally.

In delivery of large programs globally we often deliver through the use of complex supply chain partner arrangements, including through not for profits, community organisations, and other private sector providers. These supply chain arrangements often last for the length of the program, which can be more than 10 years in some cases. We also form part of other government providers' supply chains, where they require our expertise, or where it is more efficient or cost effective to deliver through our existing operations rather than through their own.

APM has a number of consortia or joint ventures around the world which can arise depending on the nature of the programs we are tendering for or delivering services under. The two principal joint ventures we have are with D'Aleph in Spain, and on our Veterans Services Contract in Canada.

The risks of modern slavery practices in APM Group's operations and supply chains

APMHSI has considered its operations and supply chains, and considers that the risk that APM has caused, contributed to, or is directly linked to modern slavery practices is very low.

Sector Risk

Given our customers are generally large government customers, there is little sector risk associated with delivery of our services.

Geographical Risk

Other than Singapore, APM's programs are delivered in OECD countries where the risk of modern slavery is low in our operations. We also consider risks of modern slavery in our operations to be low in Singapore.

Product and Services Risk

We are a service delivery organisation and do not manufacture or supply products. As our services are mostly delivered face to face by white collar workers, the chance of product and services risk is low. There may be some indirect risk of working with suppliers of branded merchandise, IT equipment or facilities management services, if our suppliers have not put in place adequate controls or measures.

Entity Risks

Most of our supply chain is directly procured by APM and in almost all cases is procured in that country where we operate. We have in place procurement controls to ensure we deal with reputable suppliers, and therefore this risk is low.

Actions taken by APM Group to assess and address modern slavery risks

APM Group has carried out a risk assessment to assess the risk of modern slavery either caused by APM Group or linked to APM Group.

Due diligence

APM Group's Risk Management Framework provides the methodology for identification and assessment of any modern slavery risks. The Framework is aligned with ISO 31000:2009 Risk Management Principles and Guidelines.



APM GROUP'S MODERN SLAVERY STATEMENT

Reporting period 1 July 2019 to 30 June 2020



Following the principles in our Framework, the highest exposures potentially arise in the following areas:

Direct facilities management services to sites	This class of entities is often procured locally and may be of lower value and therefore subject to less governance or scrutiny. The labour is often lower paid and may be vulnerable to exploitation.
Indirect services	Such as utility providers (power, telecommunications), software suppliers and web-based services. These services are often procured generically with little understanding of how the service is generated or where certain elements of it are located (such as call centres etc).
Plant and equipment	Information technology, laptops or mobile phones. This class of entities may have very complex supply chains, operate offshore and source materials and labour from entities with fewer controls to mitigate modern slavery risks.
Products	Stationery supplies, branded merchandise and office furniture. These products are acquired from local producers, but may be manufactured or sourced from third parties without adequate checks or controls by the vendor.

The risk review identified robust controls and treatments including:

- Board Governance
- Third Party Service, Financial, Quality, IT system compliance audits, which are often made available to government customers for further review and checks
- Complex and targeted human resource management processes
- Finance and Payroll expertise and systems
- Checks on licences and certifications of service providers
- Binding contracts with service providers requiring compliance with laws
- Statutory audit
- Complaints and whistleblowing procedures advertised externally

Remediation processes

Maintenance of the current control environment for the APM Group is likely to ensure the risk of modern slavery remains at the lowest level of negligible risk.

In the UK because the APM Group was subject to an existing modern slavery legislative regime, various remediation processes have been well established there such as:

- Publication of a modern slavery statement
- Creation of a modern slavery policy and reporting procedure, Code of Conduct expressly opposing modern slavery, safeguarding policy setting out our duty of care including relating to modern slavery
- Consideration of modern slavery in tender processes and supply chain awards
- Supplier questionnaires and facilitated training to supply chain partners
- Inclusion of standard contract clauses
- Communication of our commitment to eradicate modern slavery across our supply chain



APM GROUP'S MODERN SLAVERY STATEMENT

Reporting period 1 July 2019 to 30 June 2020



- Recruitment processes to ensure we employ people who can demonstrate personal values that complement our company values and are the most appropriate people for the role applied for
- Training to employees to be able to identify concerns and to report incidents or suspected human rights breaches, including any suspicion of modern slavery.

How we have assessed the effectiveness of such actions

APM Group's control environment is regularly reviewed by our Quality & Compliance and Finance teams. Regular internal audits and reviews are carried out in terms of procurement controls, quality issues and other relevant factors.

In the UK, every year since first published, our Modern Slavery Statement has been updated with assessments carried out as to ongoing compliance and improvements.

Consultation with APM Group Members

APM has consulted broadly and involved the CEOs of all relevant businesses in the review of this Statement who are aware of and support the information contained in it. There has been substantial consultation with respect to this statement with Compliance, People and Culture, Legal and group corporate representatives.

Other relevant information

This is the first year of reporting for APM Group on modern slavery, other than in the UK; a copy of Ingeus' Modern Slavery Statement can be found [here](#).

The outbreak of COVID-19 has required significant management time and attention to be devoted to handling of the global pandemic. Notwithstanding this, we have used the time to more thoroughly analyse our modern slavery risks and look forward to reporting on progress made in our 2020-2021 Financial Year report.

This statement was approved by the board of APM Human Services International Pty Ltd on 24 March 2021.

Greg Meyerowitz
Group Finance & Compliance Director
APM Human Services International Pty Ltd

