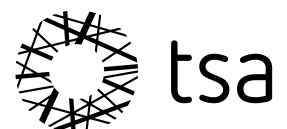


# Modern Slavery Statement 2024

TSA Group

November 2024



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## Scope

In accordance with the requirements of the *Modern Slavery Act 2018* (Cth), this Modern Slavery Statement (**Statement**) covers the activities of the Telco Sales Australia Pty Ltd, Trimatic Management Services Pty Ltd, and their controlled entities. In this Statement, these entities will be collectively referred to as the TSA Group.

This Statement pertains to the financial year ending 30 June 2024.

## Consultations

This Statement has been developed in consultation with all entities comprising the TSA Group. At the time of writing, this included;

Name	ABN
Telco Services Australia Pty Ltd	31 106 527 422
Telco Sales Australia Pty Ltd	50 153 951 841
Trimatic Management Services Pty Ltd (as trustee for the Trimatic Management Services Unit Trust)	20 107 003 636
TSA Australia Pty Ltd	81 106 029 976
Trimatic Pty Ltd (as trustee for the Trimatic Unit Trust)	23 103 893 778
Telco Services International Pty Ltd	13 165 009 352

# About TSA Group

TSA design and deliver contact centre solutions for the world's leading brands.

We're a proudly Australian owned customer experience technology and services provider that specialises in connecting brands with their customers. From helping our partners design personalised CX experiences, to building bespoke technological solutions and delivering customer engagement services, we help our partners do great things for their customers.



**\$1b+**

In sales generated for our clients



**20m**

Customer interactions annually



**100%**

Carbon Neutral



**5.4k+**

Team members across 5 locations in Australia, the Philippines & New Zealand

## Structure and operations

Our leading people, process and technology models support Australian businesses to design and deliver inspired customer experiences across a range of business lines and initiatives.



## Locations



## Awards and accreditations



## Supply chains



## Commitments

### Human rights

TSA Group complies with the laws relating to labour and human rights in the countries in which we operate, and we engage with our suppliers to confirm their compliance with related human rights requirements. TSA Group manages its operations and supply chains in a manner consistent with the United Nations' (UN) Universal Declaration of Human Rights, UN Guiding Principles of Business and Human Rights, and the International Labour Organisation's (ILO) Core Conventions.

### Modern slavery

TSA Group is committed to complying with the laws relating to modern slavery and labour exploitation in the jurisdictions in which we and our suppliers operate. Our processes related to modern slavery are explained further on page 9 of this Statement.

### Child labour

TSA Group does not and will not employ children or underage labour to work in our business, unless they are participating in approved work experience or apprenticeship schemes coordinated by their school, training college or tertiary institution.

### Freedom of association

TSA Group enables all of our employees to freely, and without fear of reprisals or retribution, voice their concerns and engage with management. We respect and support the rights of our employees to form, join and participate in collective bargaining and trade union activity.

### Discrimination, harassment and bullying / inhumane treatment

TSA Group does not tolerate discrimination, harassment or bullying in any form. We comply with workplace laws in respect of discrimination, harassment and bullying. TSA Group does not engage in any form of sexual, psychological, verbal, forced, bonded or physical or otherwise compulsory labour, nor inhumane practices, abuse, slavery/forced labour or human trafficking. Our employees are free to leave our business in accordance with their employment contracts and the law.

### Safety culture

TSA Group empowers and educates all employees and managers to be proactive in managing workplace safety and risks. TSA Group has developed, implemented and maintained an effective health, safety and wellbeing management system known as TSAfe. All incidents are inspected, using our internal investigations process to provide a consistent standard of enquiry, assessment and response. TSA Group aspires to Zero Harm for all our employees, contractors and subcontractors.



# Labour and human rights policy

TSA Group is committed to respecting and supporting the labour and human rights of all of our employees. We comply with the laws relating to labour and human rights in the countries in which we operate, and expect that our suppliers do the same.

## FREEDOM OF ASSOCIATION

We will enable our employees to freely, and without fear of reprisals or retribution, voice their concerns and engage with management. We respect and support the rights of our employees to form, join and participate in collective bargaining and trade union activity.

## WAGES AND BENEFITS

We will ensure that the wages and benefits that we provide to our employees meet or exceed the legal minimums in the countries in which we operate. We will pay our employees on time, and will not withhold wages as a disciplinary method.

## NO HARASSMENT OR ABUSE

We will not tolerate, and will not engage in, any form of sexual, psychological, verbal, physical or otherwise inhumane harassment, abuse or disciplinary methods against our employees.

## NO FORCED LABOUR

We will ensure that we do not use any form of forced, bonded or compulsory labour, nor victims of slavery or human trafficking in our business. Our employees will be free to leave our business in accordance with their employment contracts (which will be consistent with the laws in the countries in which we operate). Our employees will not be required to pay any form of fee, payment or inducement to secure their employment with our business.

## HOURS OF WORK

We will ensure that our employees perform their work in accordance with the hours stipulated in their employment contracts (which will be consistent with the laws in the countries in which we operate). Overtime work will be voluntary in nature, and employees will be compensated for this in accordance with their employment contracts and the law.

## EQUAL OPPORTUNITY

We will ensure that our employment practices (including recruitment) do not discriminate on the basis of age, gender, ethnicity, race, caste, national origin, religion, disability, sexual orientation, marriage status, union membership, political affiliation, pregnancy or potential pregnancy, irrelevant criminal record or family responsibility.

## NO CHILD LABOUR

We will not employ children or underage labour to work in our business, unless they are participating in approved work experience or apprenticeship schemes coordinated by their school, training college or tertiary institution.

# Risk of modern slavery practices

TSA Group assesses modern slavery risks through the following risk factors:

- Vulnerable populations: populations where there is a higher presence of migrant and base skill workers;
- High risk business models: business models where there is a higher prevalence of labour hire and outsourcing, franchising and seasonality;
- High risk categories: businesses that are oriented towards goods not for resale, services procurement, extraction or processing of raw materials; and
- High risk geographies: countries and geographies that experience conflict, weak rule of law, corruption, displacement and state failure to protect human rights.

We consider the following areas as the highest potential risk areas within our operations and supply chains:

- Employment and labour arrangements in use within third party service suppliers; including agencies contracted for cleaning, security, maintenance and fit out services
- Employment and labour arrangements in use within third party equipment supply chains; including manufacturing of IT equipment

# How TSA assesses and addresses risks of modern slavery practices

## Recruitment and diversity

We ensure that our employment practices (including recruitment) do not discriminate on the basis of any form of fee, payment or inducement to secure their employment with our business including age, gender, ethnicity, race, caste, national origin, religion, disability, sexual orientation, marriage status, or union. We recognise that to best serve our clients and their customers, our teams should be populated by people with diverse experiences, backgrounds and preferences, from all walks of life.

## Worker entitlements

TSA Group ensures that our employees perform their work in accordance with worker entitlements stipulated in the relevant laws in the countries in which operate and employment contracts (which are consistent with the laws in the countries in which we operate). TSA Group's Enterprise Agreement is registered with the Fair Work Commission as Trimatic Management Services Pty Ltd Enterprise Agreement 2014. TSA Group ensures that the wages and benefits that we provide to our employees meet or exceed the legal minimums in the countries in which we operate. We pay our employees on time, and do not withhold wages as a disciplinary method.

## Management of TSA Group's workplace-related human rights risks across our supply chains

Suppliers are vetted prior to onboarding and reassessed at regular intervals based on the level of risk that exists within the supply chain. TSA Group reviews the published results of our suppliers to ensure that our human rights obligations are maintained. When engaging enterprise-level suppliers, we ensure that our contractual terms require (at a minimum) that they comply with all relevant Australian laws, including (and particularly) those relating to privacy, ethical business practices, labour and human rights practices and environment and safety practices.

## Sub-contractor and supplier consultation

TSA Group maintains manual and electronic registers of sub-contractors. Additionally, contractors who will be performing work on site are assigned mandatory e-learning modules to complete via our learning management system, prior to or coinciding with work commencement.

TSA Group periodically consults existing suppliers to ensure they are aware of ethical requirements with respect to modern slavery, including discussions to verify their compliance practices regarding wages and working conditions.

### Whistleblower protection

TSA Group has systems in place to ensure all whistleblowers can raise concerns regarding actual or suspected contraventions of our ethical and legal standards without fear of punishment or feeling threatened by doing so.

As part of our commitment towards maintaining the highest standard of professional conduct and ethical behaviour in our business activities, this policy is made available to all employees and officers of the company.

### Dedicated risk management function

The TSA Group risk management framework defines the systems and processes for identifying, controlling and monitoring risks both internally and within our supply chain. TSA Group maintains a risk register and risk assessment matrix which is applied to manage and control risks in an informed manner in pursuit of our strategic objectives and to meet customer, shareholder, regulatory, industry and other stakeholder expectations.

### Annual financial controls audit

TSA Group engages external audit partners to ensure our financial records are an accurate and fair representation of our business dealings.

## Assessment of effectiveness

The TSA Group Business Management System (BMS) outlines the critical tools and strategies that are used to identify, report and manage risks and issues across TSA Group businesses, operations and supply chains. TSA Group's BMS has been designed to provide an easy to understand and accessible overview of how we do things at TSA Group, ensuring consistency and quality in everything we do.

In 2024, TSA implemented the below actions to improve the effectiveness of our supply chain management:

### Supplier Management Committee

TSA Group has updated our supplier contracts management process and data base, establishing a committee including Risk Management, Information Security and Group Leadership representatives to ensure compliance to obligations and commitments, with focus on high-risk areas of our supply chain.

### Supplier Onboarding

TSA updated our onboarding form for new suppliers and reviewed our Supplier onboarding tool for improvement and automation opportunities in our supplier due diligence process.

### Risk Management Framework

In 2024 TSA Group updated our Risk Management Framework, including new key roles into our Risk Committee.

Through ongoing assessment of the efficacy of our processes and procedures, TSA Group has identified the following key actions for execution over the next calendar year:

- Continue implementation of the Supplier Management Committee and the new governance cadences, including a performance in review to assess the effectiveness of the committee and implementation of this framework and implementation of this approach across the remaining areas of our supply chain.
- Review and re-assess the effectiveness of our supplier due diligence processes to identify further improvement opportunities.
- Increase the stakeholder groups participating in our enterprise risk management cadences and encourage ownership and accountability for calling out and mitigating risk in all departments and levels of leadership.

## Approvals

The TSA Group Modern Slavery Statement, covering the TSA Group's activities for the financial year ending 30 June 2024, has been approved by the Board of Directors on 16 December 2024.



Tim Ungar  
Chairman



Luke Kenny  
Executive Director

# Thank you

Inspired  
Customer  
Experience