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# Modern Slavery Statement

Talent International  
Year Ending 30<sup>th</sup> June 2021





## Modern Slavery Statement (“MSS”)

Talent International Holdings Pty Ltd ACN 131 419 577 (“we” or “Talent”) is a reporting entity under the *Modern Slavery Act 2018* (Cth) (the “Act”). This MSS is prepared in accordance with section 16 of the Act and describes steps taken by Talent during the financial year ended 30 June 2021 to identify, manage and mitigate the risks of modern slavery in our operations and supply chains and how we evaluate the effectiveness of our responses.

Talent understands the importance of transparency across supply chains in order to present accurate information on real and potential modern slavery practices. Accordingly, Talent commits to assessing and monitoring the risks of modern slavery in its business and through its supply chain.

### Talent’s Structure, Operations and Supply Chains

#### *Structure*

Talent is a parent company made up of a number of Australian and International trading companies comprising of: Talent Group Pty Ltd; Talent International (NSW) Pty Ltd; Talent International (VIC) Pty Ltd; Talent International (ACT) Pty Ltd; Talent International (QLD) Pty Ltd; Talent International (SA) Pty Ltd; Talent International Pty Ltd; Avec Global Pty Ltd; Talent RISE Foundation Limited; Talent International (UK) Ltd; Talent Outsourcing UK Ltd; Hunter Charles; Avec Global UK Ltd; Talent International NV; Talent International (NZ) Ltd; Talent International USA Inc.; and Talent International CA, Inc (together, the “Controlled Talent Entities”). Talent’s head office is located in Sydney, Australia.

#### *Operations*

Talent provides recruitment and labour hire services to Australian and international businesses, specialising in the recruitment of IT contractors, consultants and employees. Talent operates in Australia, New Zealand, the United Kingdom, Europe and the United States.

Talent directly employs 317 people. 66% are based in Australia. Employees are employed under individual contracts and some of them are covered by industrial agreements.

#### *Supply Chains*

The Talent supply chain mostly consists of Independent Contractors working in the white-collar IT sector. During the reporting period, Talent engaged 5713 Independent Contractors.

During the reporting period, Talent had approximately a further 343 suppliers across Australia and additional suppliers from New Zealand, United Kingdom, USA and the European Union.





Measured by value, the majority of our payments made are to suppliers in Australia.

## Risks of Modern Slavery Practices

Modern slavery is defined as including eight types of serious exploitation:

- // trafficking in persons,
- // slavery,
- // servitude,
- // forced marriage,
- // forced labour,
- // debt bondage,
- // the worst forms of child labour, and
- // deceptive recruiting for labour or services.

Talent has a zero tolerance approach to modern slavery. We are committed to mitigating the risk of modern slavery occurring within our business or supply chain.

Talent restricts the supply of services to the countries our branches are located in. Talent believes that in supplying such contracting services, it is compliant with all relevant legislative requirements in those countries it operates in, including Australia, and puts into practice its own associated policies.

We have assessed our direct workforce as being of low risk to modern slavery, and believe our people and policies further mitigate this risk. Accordingly, we consider that our greatest risk of involvement in modern slavery is being indirectly linked to it through our supplier relationships.

The following indicators were the primary source used to identify and assess potential supplier risk:

- // sector and industry risk;
- // product and services risk;
- // geographic risk; and
- // entity risk.

Within Talent's supply chains, the following key areas were identified for potential modern slavery and human trafficking risks:

- // office cleaning;
- // IT hardware,
- // print and promotional goods and services.

## Actions to assess and address modern slavery risks

The Talent approach to assessing and addressing modern slavery risks in our operations and supply chains is based on key three principles:





1. Build meaningful relationships with partners – this includes partnership up and down the supply chain. In particular this includes:
  - a. Providing awareness of modern slavery through engagement;
  - b. Communicating our expectations through clear open discussion and agreements;
  - c. Recognising and responding to the potential for inappropriate practices through questioning; and
  - d. Providing timely and accurate information on supply practices, and any actions being undertaken to mitigate modern slavery risks.
2. Adopt a risk management approach, both internally and with our suppliers to identify high risk areas where modern slavery could be present, and evaluate and monitor these risks.
3. Recognise the leverage we have to influence change. Consider how our own business practices could influence and contribute towards inappropriate practices, such as where supplier prices are unusually low.

During the reporting period, Talent included clauses in our standard contractor and commercial contracts to address Workplace Health & Safety, Rates of Pay, Conditions of Work sites and related Work Rights and other statutory regulations (e.g. discrimination). Further, Talent includes anti-modern slavery clauses in our standard contractor contracts.

#### *Governance*

In addition, the following Talent policies help mitigate the risks across our operations and supply chains, with respect to modern slavery:

- // Anti-Bribery & Anti-Corruption Policy;
- // Bullying & Harassment Policy;
- // Code of Conduct;
- // Equal Employment Opportunity & Anti-Discrimination;
- // Risk Management Policy;
- // Work, Health & Safety Policy Statement; &
- // Whistleblowing Policy.

All Talent employees are required to comply with the above policies and Code of Conduct. Our Code of Conduct affirms Talent's belief in responsible, social and ethical behaviour from all employees and clarifies the standards of behaviour that we expect from all employees. Breaches of our policies or Code of Conduct may be regarded as misconduct, which can lead to disciplinary action including termination of employment or engagement.

#### *Remediation – grievances and complaints*





Talent has a Whistleblowing Policy that allows employees, directors and contractors of Talent to raise concerns in a confidential manner. Individuals may report suspected instances of modern slavery through this Program.

#### Monitoring the effectiveness of our actions

As mentioned, Talent's primary function is to engage and assign white collar IT contract workers to address its clients' workforce requirements. In working with our clients, Talent strives to ensure a contractor supply that mitigates risks associated with modern slavery.

Some examples of the actions taken by Talent to monitor the effectiveness of our actions, during the reporting period, include:

- // Where reasonably practicable, inspecting client sites to complete Work Health and Safety assessments. This ensures the working conditions of our clients meet the standard expected under statutory requirements. Where any working conditions are assessed as being substandard, Talent engages with the stakeholder to ensure appropriate measures are taken to mitigate any risks that can be associated to modern slavery. This may involve educating the relevant stakeholder of the issue that may need to be rectified.
- // Monitoring compliance with our standard contractor and commercial contracts.
- // Continual engagement with contractors and clients to assist with promoting a continuous and positive dialogue with both contractors and clients.
- // Ensuring statutory working rights are checked for each on boarded contractor.
- // Education of internal and external stakeholders regarding risks and potential consequences around working conditions that could potentially lead to an allegation of modern slavery.
- // Offering of a third party confidential Employee Assistance Program ("EAP") to Talent staff and contractors. Whilst each EAP connection with an individual is highly confidential, Talent can obtain very broad data on categories that will help to identify shortfalls in working conditions.
- // Investigating, and considering any trends in, modern slavery related instances reported through grievance mechanism.
- // Talent held a labour hire licence in Queensland and Victoria during the reporting period. The objectives of the Australian labour hire licensing schemes are, broadly, to protect workers from exploitation by labour hire providers and their clients (hosts), 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.
- // Talent achieved and maintained Quality Management System certification under ISO 9001:2015 in relation to Supply of Information Technology professionals on a contract or permanent basis.





// Active membership of both our industry body's Association of Professional Staffing Companies ("APSCO") and the Recruitment, Consulting and Staffing Association ("RCSA"). Both APSCO and the RCSA provided Talent with resources to keep us informed of any modern slavery law requirements or developments.

#### Stakeholder Consultation

During the reporting period, Talent undertook consultation with the Controlled Talent Entities regarding the preparation of this MSS. All Controlled Talent Entities were provided an opportunity to contribute.

Prior to being put to the Board for review and approval, this MSS has been reviewed the by relevant subject matter experts within the business and the senior management of Talent.

This MSS was approved by the Board of Talent on 31st March 2022.

Signed

Mark Nielsen  
Director & CEO

31st March 2022

