



WESTERN AUSTRALIA

VICTORIA



NEW SOUTH WALES



QUEENSLAND

NORTHERN TERRITORY



SOUTH AUSTRALIA

TASMANIA

## CGH GROUP – MODERN SLAVERY STATEMENT

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# INTRODUCTION

## Purpose and scope of this Statement

This FY21 Modern Slavery Statement (Statement) is prepared by CGH Group ABN13 145 558 087 (The Company) pursuant to the Modern Slavery Act 2018 (Cth) (Act).

This, our first annual statement, is a Joint Statement made by CGH Group on behalf of itself and controlled entities during the financial year ended 30 June 2021 (reporting period).

This Statement relates to the operations and extended supply chains of CGH Group.

It was approved by CGH Group's Board of Directors on 16<sup>th</sup> June 2022.

The Statement sets out the actions taken by CGH Group to assess and address modern slavery risks in our business and supply chain throughout the reporting period. Each section in this Statement corresponds to a mandatory criterion of the Act.

## Modern Slavery

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

Modern slavery can occur in every industry and sector and has severe consequences for victims.

Practices that constitute modern slavery can include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- the worst forms of child labour

Modern slavery is a term used to describe serious exploitation.

It does not include practices like substandard working conditions or underpayment of workers which are still harmful and often illegal and may provide warning signs of modern slavery<sup>1</sup>

## Our Commitment

CGH Group condemns modern slavery in its operations or supply chains.

CGH Group is committed to ethical practices by preventing or mitigating adverse human rights impacts that are caused by or linked to our operations and supply chains.

We understand our legal and ethical responsibilities in relation to human rights and recognise that some groups in Australia may be vulnerable to human rights abuses, including Aboriginal and Torres Strait Islander people, asylum seekers, migrants from non-English speaking backgrounds and those living in poverty and people with a disability.

This Statement seeks to provide an overview of our efforts to understand and address modern slavery risks within our business. In the spirit of the Act, we are committed to ongoing and continuous improvements with regards to modern slavery and we recognise that our efforts to identify and manage risks of slavery are an ongoing commitment.

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<sup>1</sup> Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities: <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>

# WHO WE ARE

## About Us

CGH Group was founded in Darwin in 2008 as CoreStaff Group Holdings and has grown rapidly to become a national leader in recruitment and human resource services.

In 2016, parent company CGH Group was established to allow our brands to flourish with their own identities and expert areas. The group now works with customers across all levels of their organisations and has the flexibility to provide end to end or tailored solutions.

Our national reach continues to expand, with 20+ branches throughout capital cities, metropolitan and regional areas.

CGH is represented by four individual brands; Beilby Downing Teal (Executive Search & Permanent Placement Services), CoreStaff (Recruitment and Labour Hire), GOAL Indigenous Services (Indigenous Employment Pathways), and Rimfire Resources (Agribusiness Recruitment and HR Solutions).

This network allows each brand the independence to grow their own identities and capabilities while also encouraging integrated solutions for customers where the need arises.

## CGH Group Structure

CGH Group is a privately owned Australian company and comprises the brands

- **CoreStaff** - a specialist provider of labour hire and permanent recruitment services to some of the largest companies in Australia.
- **Beilby Downing Teal** - specialise in professional and executive recruitment. BDT utilise executive search and recruitment services to source corporate executives and professionals across corporate and government sectors.
- **Goal Indigenous Services** - provide Indigenous employment opportunities to workers and customers. Goal Indigenous Services provides employment and training, while partnering with customers to provide mentoring and cultural awareness programs
- **Rimfire Resources** - is a leader in Agribusiness recruitment and human resources across Australia and New Zealand. Rimfire provides search and recruitment, HR advice and solutions and Agribusiness benchmarking and salary surveys

**CGH Services** provide centralised services incorporating finance, payroll, industrial relations, health and safety, information technology & security, sales & marketing, compliance, performance management, training, and risk management to the Company. This provides a nationally consistent approach to the management and monitoring of the requirements under the Act.

Corporate Governance is provided by a Board of Directors who oversee the management of the Group and provide strategic guidance.

Each entity in the CGH Group Pty Ltd operates under the direction and governance of the Company.

The entities are CoreStaff NT Pty Ltd, CoreStaff NSW Pty Ltd, CoreStaff QLD Pty Ltd, CoreStaff VIC Pty Ltd, CoreStaff WA Pty Ltd, CoreStaff SA Pty Ltd & CoreStaff TAS Pty Ltd, Goal Indigenous Services NT Pty Ltd, Goal Indigenous Services VIC Pty Ltd, Goal Indigenous Services WA Pty Ltd, Goal Indigenous Services QLD, Goal Indigenous Services Pty Ltd, Goal Indigenous Services Australia Pty Ltd, Goal Workwear Pty Ltd, Beilby Downing Teal Pty Ltd, Rimfire Resources Pty Ltd and CGH Services Pty Ltd.

CGH Group is headquartered in Darwin (NT) and has offices in Brisbane, Sydney, Melbourne, Perth, Adelaide, Darwin, Hobart, Townsville, Singleton, Newcastle, Launceston, Devonport and Broken Hill.

CGH Group has an annual consolidated revenue of over \$100m across the reporting period, therefore meeting the Acts definition of a reporting entity.

# SNAPSHOT OF OUR ORGANISATION

## Our people

200 direct staff including management, recruitment consultants, business development, administration, payroll and finance.

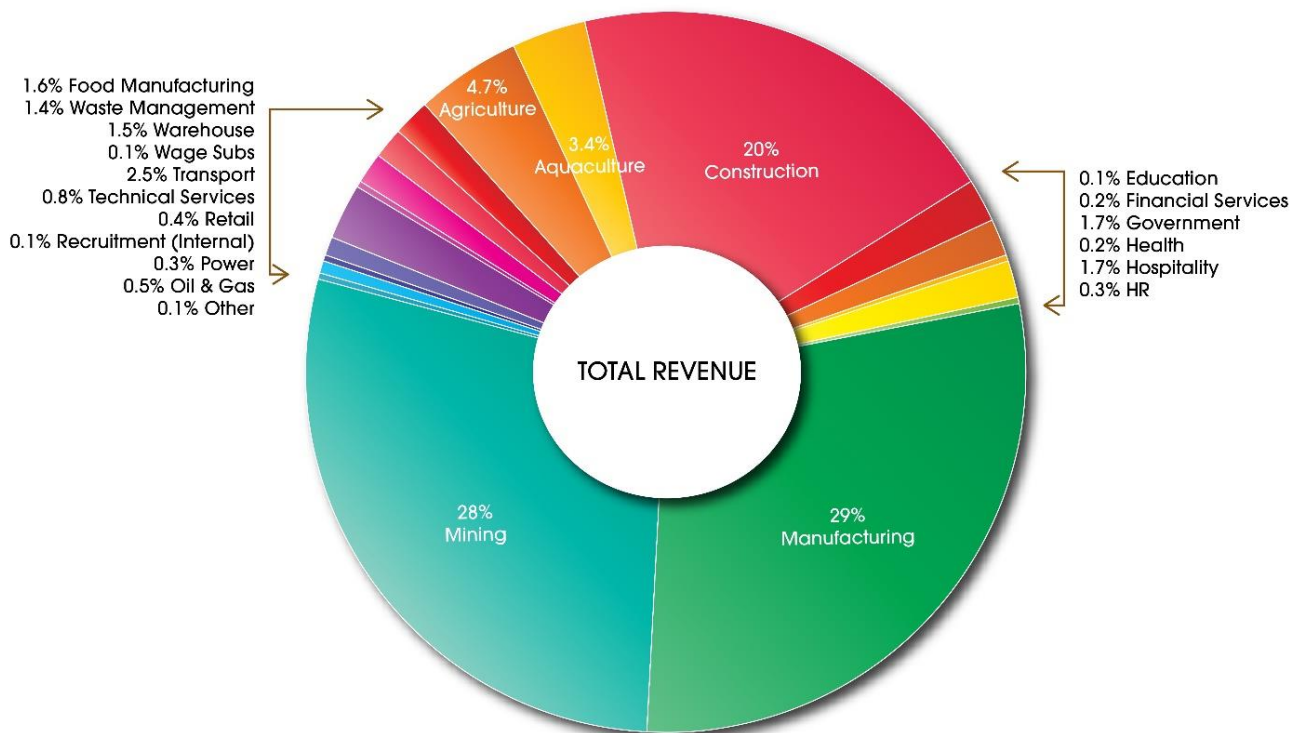
## Our operations

1000+ permanent placements

25,000 temporary placements at over 500 customer sites

3000 temporary field staff paid each week

## Our industries



## LEVELS OF RISK IN OUR BUSINESS AND SUPPLY CHAIN

### Our approach to identifying modern slavery risks

CGH Group recognises the potential for modern slavery risks to exist in the Company's operations and supply chains.

We have established how modern slavery relates specifically to our industry, have analysed various recruitment and financial reports and determined which area of our operations and suppliers are at risk of modern slavery, the regions that may be at a higher risk of modern slavery and also what types of workers are most at risk.

### Our risks – an overview

Potential Risk	Risk Explanation
<p>Procurement of goods from direct suppliers where the goods are manufactured in jurisdictions that are at higher risk for modern slavery. Locations more inclined to have modern slavery occurring include Indonesia, China, and North Korea.</p> <p>Procurement of goods in high-risk industries or sectors that are the most vulnerable to modern slavery and/or those with complex global supply chains.</p> <p>Industries or sectors more inclined to have modern slavery occurring include food, tobacco, clothing, and construction.</p>	<p>CGH Group's supply chain for FY21 consisted of over 500 direct suppliers. Key products and services CGH Group procure includes</p> <ul style="list-style-type: none"> <li>• Professional &amp; Business services</li> <li>• ICT goods and services</li> <li>• Corporate and administrative services</li> <li>• Medical and drug testing services</li> <li>• PPE</li> <li>• Vehicles, spare parts, fuel and tools</li> <li>• Office consumables</li> </ul>
<p>Employing field staff in industries, sectors or in short term projects most at risk of direct or indirect complicity in Modern Slavery including</p> <ul style="list-style-type: none"> <li>• Construction</li> <li>• Agriculture</li> <li>• Hospitality</li> <li>• Food services</li> <li>• Meat processing</li> <li>• Cleaning</li> <li>• Domestic work</li> </ul> <p>Employing field staff most likely to be targeted include Aboriginal and Torres Strait Islander workers, migrant workers, students or low-skilled workers.</p>	<p>We engage 3,000 people in our workforce in any given week.</p> <p>As we do not have direct responsibility for the supervision or work site, we have less control or oversight of work conditions compared to our direct staff.</p>

## Our risk ratings

	Australia	Rest of World
High Risk		<ul style="list-style-type: none"> <li>• Workwear</li> <li>• PPE</li> <li>• Promotional items (stubby coolers, hats, cards etc)</li> </ul>
Medium risk		<ul style="list-style-type: none"> <li>• Office consumables</li> <li>• IT Hardware</li> <li>• Medical and drug testing equipment</li> </ul>
Low risk	<ul style="list-style-type: none"> <li>• Professional &amp; Business services</li> <li>• ICT goods and services</li> <li>• Corporate and administrative services</li> <li>• Medical and drug testing services</li> <li>• PPE</li> <li>• Vehicles, spare parts, fuel and tools</li> <li>• Field Staff</li> <li>• Direct Staff</li> </ul>	

## OUR ACTIONS

The below documents outline CGH Group's approach to establishing the essential standards of personal and corporate conduct and the requirements and behaviour expected of everyone who works for the Company (including Directors, Field Staff and suppliers/vendors).

### Our guiding policies and procedures

The foundation policy documents for human rights protection within CGH Group are

- Code of Conduct Policy
- Human Rights Policy
- Business Integrity
- Recruitment Policy
- Equal Employment Opportunity Policy
- Whistleblower Policy
- Privacy Policy
- Harassment Free Workplace Policy
- Equal Employment Opportunity Policy
- Employment of Children Policy
- Leave Policy
- Purchasing and evaluation of suppliers' procedure
- Right to Work in Australia procedure
- Recruitment procedure – labour hire
- Grievance procedure
- Customer site assessment procedure
- Employee assistance program

These documents outline CGH Group's approach to establishing the essential standards of personal and corporate conduct and the requirements and behaviour expected of everyone who works for the Company (including Directors, staff, field staff and suppliers/vendors).

Supporting these documents are specific guidelines and processes that ensure the highest standards are achieved across our business to protect the Company from risks of modern slavery, meet reporting obligations and strengthen transparency.

## Staff training and engagement

All CGH Group staff are expected to comply with all laws and act in accordance with our business policies and procedures.

During FY21 an internal modern slavery course was created and delivered via our online learning platform.

All staff complete formal training on modern slavery to build awareness in recognising potential human rights and modern slavery risks within the business, reporting all relevant issues and understanding our grievance mechanisms.

Training in key related areas such as our code of conduct, business integrity, human rights, whistleblower policies supplement this content.

	Target Participants	Key messages	Outcome
Group orientation training	Mandatory for all staff on commencement, with a refresher every two years	Minimum requirements of behaviour and conduct as outlined in our Group policies.	95% of staff have completed all mandatory courses
General modern slavery awareness	Mandatory for all staff on commencement, with a refresher every two years	<ul style="list-style-type: none"><li>• What is modern slavery?</li><li>• Where modern slavery might exist</li><li>• What modern slavery looks like and who is affected</li><li>• CGH Group's commitment, our policies and approach</li><li>• The measures CGH Group is implementing to identify and address risks and warning signs</li><li>• How to respond appropriately and what staff can do to address modern slavery risks</li><li>• How to report suspicions or concerns about modern slavery practices</li></ul>	89% of staff have completed all mandatory courses

## **Managing risk in our operations – customer management**

We are committed to ensuring that every business we provide field staff to, engage, remunerate, and treat our field staff in accordance with Australian workplace laws.

### **FY21 Initiatives/ Actions/Findings**

CGH Group take a zero-tolerance approach to any form of modern slavery within our customer's operations. To ensure this;

- Customer worksites are visited, and a site and risk assessment completed.

During this assessment, work conditions are reviewed (including ease of movement, safety, hygiene, and reasonableness of the environment)

We ensure that all customers allow field staff to move about during the workday to use restroom, drink water, etc. and are free to leave the workplace at the end of their shift or at any time, with reasonable notice.

We do not supply accommodation directly for our field staff however we do conduct site assessments of customer premises where accommodation is supplied through an employment arrangement.

During FY21 there were no instances of field staff paying for accommodation. Were this the case then any costs would be fair and reasonable. The results of these audits are documented in our database

These audits are conducted prior to initial placement of field staff then every year there-after (dependent on the initial risk rating and more frequently if applicable).

- During the field staff's placement, we regularly check in with both customers and field staff to check on job satisfaction, safety and ensure there is no modern slavery risks

The results of these check ins are documented in our database

- If gaps are found in our customer's practices or management of modern slavery risks, we work with the customer to develop a corrective actions plan.
- Our customer Terms and Conditions include the requirement to continuously assess and address modern slavery risks in their practices and supply chains.
- We may cease or suspend supply of Services to a Customer with one hours' notice for any reasons whatsoever.



## **Managing risk in our operations – labour hire**

We understand that under the Act 'modern slavery risk' potentially represents risk to individuals involved when providing field staff to customers.

We ensure, at all times, that the selection, recruitment and employment of all individuals is ethical and in compliance with legislative requirements.

### **FY21 Initiatives/ Actions/Findings**

The following are some of the controls and actions we take that are in context to our business and are most relevant to modern slavery, either because they address relevant labour protections like fair pay or focus on higher risk or more vulnerable worker segments, such as visa holders

- CGH Group ensure all relevant modern awards or enterprise agreements our field staff are engaged under, are correct and in accordance with FairWork.
- All work is performed voluntarily, in exchange for lawful compensation, and not subject to actual or threatened violence, confinement, retention of ID, and forfeiture of legal rights or privileges.
- field staff are not required to pay a fee or lodge a deposit to CGH Group as a condition of obtaining employment or in return for our services.
- CGH Group does not keep or hold original ID-, passports, licences or personal documents
- PPE costs are not borne by field staff
- Any accommodation costs are fair and reasonable
- Field staff are provided with a written contract of employment, with agreed terms and conditions, including notice periods on both sides.
- Our employment conditions adhere to the legislation relevant to the jurisdiction in which we operate
- We do not engage in child labour, either directly or indirectly and adhere to the legal age requirements and any limitations regarding hours of work, wages, working conditions, and minimum education as defined by each state or territory in which we operate
- CGH Group maintains complete and accurate records of wages paid and hours worked
- We have controls in place that prevent placements from occurring without the appropriate work rights and skills checks being completed
- These controls are also used to manage the expiring of working
- We provide ongoing training for our staff who are responsible for sourcing and placing field staff
- We conduct regularly monitoring activities and audits of pay and work conditions
- We have not identified any areas where there may be a risk of forced labour and modern slavery practices in our operations.
- Our online continuous improvement process (cause and corrective actions) would be used if any gaps or non-conformances are found in our operations
- CGH has an open and transparent grievance and reporting process for all field staff & stakeholders

## **Managing risk in our operations – suppliers and vendors**

### **FY21 Actions taken**

Our top 100 suppliers (by spend) across the Company have been formally risk assessed by Commercial law firm Cowell Clarke, using World- Check Risk intelligence data.

These 100 suppliers and vendors were screened against 29 key risk areas (ranging from sanctions, political exposure, social matters including modern slavery, bribery and corruption, environment to regulatory breaches). The screenings system searches are wide and include any of the suppliers and vendors related businesses.

The results illustrated no immediate or imminent risks, with the majority of entities showing no adverse result.

## **EFFECTIVENESS**

### **External Assessment and Certification**

CGH Group hold StaffSure Certification, a recruitment industry accreditation that focuses on business integrity. Certification confirms that we have a comprehensive HR compliance structure and are operating ethically.

On a two-yearly basis the company is audited against six key business integrity elements.

- **Work Status & Remuneration** - Assessment of labour age, wage and benefits, working hours and records, discrimination, harassment and freedom.
- **Safe Work** - Assessment of health and safety, Provider locations and complaints management
- **Fit & Proper Persons** own and run the business
- **Financial Assurance** -Assessment of the organisations financial, insurance and information security management processes
- **Migration Compliance** -Assessment of migration and Visa conditions
- **Accommodation** -Assessment of any supplied accommodation by employers or customers is suitable and rent is fair

### **Internal Assessment**

In addition to external audits, CGH Group conduct regular internal compliance audits to ensure all requirements relating to the selection and employment of field staff are adhered to.

To date we have found no incidents of modern slavery in our supply chain.

## LOOKING FORWARD

CGH Group recognise that we have several key focus areas, and, in the spirit of the Act, we are committed to the following actions.

### FY22 Key Action Areas

Action
Include CGH's grievance mechanism in the field staff's commencement booklet.
Conduct another supplier modern slavery risk survey/audit
Review supplier audits and develop framework for corrective actions (where needed)
Conduct annual review with suppliers and check progress of any actions put in place to address modern slavery risks
Map and risk rate our supply chain and analyse suppliers in terms of country of origin, sector/industry
High risk suppliers will be contacted for detailed assessment and further questioned to better understand the business, their commitment to eradicating modern slavery and the steps they are taking.
Review our supplier prequalification/ onboarding practices
Create a Supplier code of conduct and provide to all suppliers
Senior management to review CGH Group's response to modern slavery annually.
Look for continual improvement opportunities and continue to encourage suppliers to make their own Modern Slavery commitment.
All people with purchasing authorities understand risks and make responsible buying decisions

### CONSULTATION AND APPROVAL

In accordance with section 14(1) of the Act, this Statement is given by the Company and covers the Company and its reporting entities. It has been prepared in consultation with each reporting entity covered by the Statement.

This statement has been approved by the Chief Executive Officer of CGH Group and the board of directors and is signed by Rob Blenkinship in his role as CEO and Director of CGH Group.



Rob Blenkinship  
Chief Executive Officer  
CGH Group Pty Ltd