



## P-0117.1 ASG Modern Slavery Statement

### Overview

This document is Ashley Services Group's annual Modern Slavery Statement, covering the period 1 July 2020 to 30 June 2021.

### What is Modern Slavery?

Modern Slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

The Australian Government estimates that there are approximately 1500 victims of modern slavery in Australia at any time. The United Nations estimates that at least 40 million people around the globe are in modern-day slavery. Those most at risk include women and children who may have little or no capacity to protect themselves.

Australia has agreed with the United Nations to attempt to abolish modern slavery by 2030.

### Serious exploitation

There are eight types of serious exploitation which combined make up modern slavery:

1. Trafficking in persons – the recruitment, harbouring and movement of a person for exploitation through modern slavery.
2. Slavery - situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
3. Servitude – situations where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their workplace.
4. Forced marriage – situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the marriage ceremony's nature and effect.
5. Forced labour - situations where victims are either not free to stop work or not free to leave their workplace.



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6. Debt bondage – situations, where the victim's services are pledged as security for a debt and the debt is manifestly excessive of the victims' services are not applied to liquidate the debt or the services' length and nature are not limited and defined.
7. Deceptive recruiting for labour or services - situations where the victim is deceived about whether they will be exploited through a type of modern slavery.
8. Serious exploitation of children and child labour – situations including enslavement, sexual exploitation, used to produce or traffic drugs or exposure to dangerous work. (the "worst forms").

Freedom from slavery is a fundamental human right. Under the Australian Government endorsed by the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles), entities have a responsibility to respect human rights in their operations and supply chains. This responsibility includes taking action to prevent, mitigate and, where appropriate, remedy modern slavery in your entity's operations and supply chains.

Other illegal and harmful practices may be present within the supply chain but are not considered modern slavery. Practices like substandard working conditions or underpayment of workers may indicate more severe exploitation, corruption, and practices that impact human rights.

### Modern Slavery Act 2018

The Australian Government's Modern Slavery Act 2018 (the Act) came into force on 1 January 2019. The Act establishes a mandatory reporting regime for entities:

- with consolidated revenue of at least A \$100 million in the reporting period, and
- who is either an Australian entity or a foreign entity carrying on business in Australia.

The Act requires reporting of an Annual Modern Slavery Statement. The Statement must identify and address the risks of modern slavery in Ashley Services Group's operations and supply chains and actions taken to address those risks.

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### Mandatory Requirements

There are seven mandatory criteria required to be addressed in the Statement:

1. Identify the reporting entity.
2. Describe the reporting entity's structure, operations, and supply chains.
3. Describe the risks of modern slavery practices in the reporting entity's operations and supply chains and any entities it owns or controls.
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.
5. Describe how the reporting entity assesses the effectiveness of these actions.
6. Describe the consultation process with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the Statement).
7. Any other relevant information.

### Reporting period 2020-21 and timelines

The first Australian Government Modern Slavery Statement covers the 2020 -21 Australian financial year (reporting period).

## Ashley Services Group Modern Slavery Statement

Reporting Period 1 July 2020 – 30 June 2021

### Identification

*Identify the reporting entity.*

Ashley Services Group is an integrated Labour Hire, Recruitment and Training organisation delivering quality workforce management and business improvement solutions across Australia since 1968. It is a preferred partner for custom human resource solutions with leading blue-chip organisations, not-for-profits, SMEs, and government departments.

Ashley Services Group Pty Ltd is publicly listed on the Australian Stock Exchange.



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### Structure

*Describe the reporting entity's structure, operations, and supply chains.*

#### General Structure

The Corporate Governance Framework for Ashley Services Group is approved by the Board of Directors and set out in several key documents and policies.

#### Board

The Ashley Services Group Board consists of;

- Chairperson,
- Managing Director, and
- Executive Director.

The Board's role is to oversee the management of the Group and provide strategic guidance. A Board Charter is available on the Group Website, formally setting out the Board's functions and responsibilities, with the objective of the Board being able to perform its role more effectively. This creates a system of checks and balances to provide a balance of authority.

#### Executive Committee

The Executive Committee consists of;

- Managing Director,
- Chief Financial Officer, and
- Chief Operating Officer – Recruitment & Labour Hire.

#### Operational and Service Areas

- Training,
- Recruitment, and
- Labour hire

#### Australian Business Number

92 094 747 510

#### Owned/Controlled Entities

1. Ashley Services Group Ltd
2. Ashley Institute of Training
3. Australian Institute of Vocational Development
4. Integracom Pty Ltd
5. Action Workforce Pty Ltd



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6. ADV Services Pty Ltd
7. Advance Recruitments Pty Ltd
8. ASG Container Services Pty Ltd
9. ASG Electrical Contracting Pty Ltd
10. Action Job Support Pty Ltd
11. One Force Recruitment Pty Ltd
12. The Blackadder Recruitment Company Pty Ltd
13. Concept Engineering Pty Ltd
14. Concept Employment Pty Ltd
15. Concept Recruitment Specialists Pty Ltd
16. National Institute of Training Pty Ltd (RTO 90804)
17. Ash Pty Ltd RTO 20749
18. Vocational Training Australia RTO 90804
19. Tracmin RTO 02106
20. ASG Integracom Pty Ltd RTO 51534
21. Track Safety Australia Pty Ltd
22. The Instruction Company Pty Ltd
23. Concept Retail Solutions Pty Ltd
24. Construction Contract Labour (VIC) Pty Ltd
25. Complete Traffic Services (Vic) Pty Ltd

### Registered office and locations

Head Office Level 10, 92 Pitt St Sydney, NSW 2000

Operations Office 11 Holbeche Rd, Arndell Park NSW 2148

Branch Offices in Laverton North in Melbourne, Meadowbrook in Brisbane, Fulham in Adelaide, and Maddington in WA.

### Operations

***Describe the risks of modern slavery practices in the reporting entity's operations and supply chains and any entities it owns or controls.***

### Primary Role

Partnering with clients providing outsourced support and services through long term relationships by gaining a thorough understanding of their business requirements and cultural fit.

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### Training

Through several leading Registered Training Organisations (RTO), Ashley Services Group provides nationally accredited qualifications, developed, and delivered to the Standards for National VET Regulation (SNVR) under the Australian Skills Quality Framework (ASQA), assuring the highest quality training and assessment services.

### Recruitment

Ashley Services Group offers white-collar recruitment services (permanent, temporary and contract placements) through multi-specialist provider Concept Recruitment Specialists in partnership with The Blackadder Recruitment Company. The latter provides comprehensive recruitment services to the government sector. Concept Recruitment Specialists employ a dedicated and experienced team of consultants from various industries to recruit entry-level through to senior management positions.

### Labour Hire

Ashley Services Group provides a combined labour hire and training model that meets their clients' changing requirements, provides site-specific solutions, and incorporates training to achieve a cost-effective outcome.

This is done through a large pool of inducted and available candidates able to start work within one hour of request and via a 24/7 year-round national operation with dedicated after-hours in-house consultants. The labour-hire division offers innovative, flexible, cost-effective labour-hire and workforce solutions.

### Employees and Representatives.

266 Staff National and Casual employees:

NSW	1985
NT	8
QLD	654
SA	603
VIC	1948
WA	175
TOTAL	5373

There are no representatives.



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### Countries of Operation

There are no overseas operations.

### Investments

There are no significant investments.

### Stakeholders

Ashley Services Group stakeholders include, but are not limited to:

- our client community,
- Federal, State and Territory governments and their agencies,
- our providers and partners,
- our shareholders,
- our employees and partners,
- our associates, and
- the Australian community

### Supply Chains

Ashley Services Group supply chains are within a range of suppliers and specialist located within Australia. These cover the expertise required to provide support to our clients and customers.

All suppliers to Ashley Services Group are required to comply with any laws, statutes, regulations, bylaws, ordinances, or subordinate legislation in force from time to time, including but not limited to the:

- Crimes Act 1914
- Criminal Code Act 1995
- Disability Discrimination Act 1992
- Freedom of Information Act 1982
- Environment Protection and Biodiversity Conservation Act 1999
- Privacy Act 1988
- Fair Work Act Cth (2009)
- Racial Discrimination Act 1975
- Safety, Rehabilitation and Compensation Act 1988
- Sex Discrimination Act 1984
- Trade Practices Act 1974
- Workplace Gender Equality Act 2012
- Work Health and Safety Act 2011
- Australian Capital Territory – Discrimination Act 1991



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- New South Wales – Anti-Discrimination Act 1977
- Northern Territory – Anti-Discrimination Act 1996
- Queensland – Anti-Discrimination Act 1991
- South Australia – Equal Opportunity Act 1984
- Tasmania – Anti-Discrimination Act 1998
- Victoria – Equal Opportunity Act 2010
- Western Australia – Equal Opportunity Act 1984.
- Modern Slavery Act 2018
- Corporations Act 2001 (Cth)

### Statutes and other regulations

**All safety, legal and other legislative requirements applicable to the client's workplace are identified by consulting with them. Pertinent information is retained in the client file for future reference.**

A list of relevant legislation, regulations, codes of practice and standards pertinent to the Group are maintained on a Register. All Standards, Codes of Practice and legislation/regulations that apply to the Group's operations are registered with Quality House Watch to ensure the Company is advised whenever they are changed.

The list below is indicative:

#### New South Wales:

- Industrial Relations NSW, <https://industrialrelations.nsw.gov.au/>
- SafeWork NSW, <https://www.safework.nsw.gov.au> 131050
- Icare Workers Insurance, NSW, <https://www.icare.nsw.gov.au>
- State Insurance Regulatory Authority (SIRA), NSW, <https://www.sira.nsw.gov.au>,
- Commonwealth, National Occupational Licensing Authority [www.nola.gov.au](http://www.nola.gov.au)
- Office of Environment and [www.environment.nsw.gov.au](http://www.environment.nsw.gov.au)
- NSW Government Portal at [www.legislation.nsw.gov.au](http://www.legislation.nsw.gov.au)

#### Victoria:

- Fairwork Ombudsman [www.fairwork.gov.au](http://www.fairwork.gov.au)
- WorkSafe, Victoria, WorkSafe Victoria, <http://www.worksafe.vic.gov.au>





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- National Occupational Licensing Authority [www.nola.gov.au](http://www.nola.gov.au).
- Victoria Online at <http://vic.gov.au/>
- Environmental Protection Authority <http://www.epa.vic.gov.au>
- Department of Sustainability and Environment, <http://www.dse.vic.gov.au>
- Greater Dandenong Council, <http://greaterdandenong.com/>

### Queensland:

- Wageline, <http://www.wageline.qld.gov.au/>
- Work Cover Queensland, <http://www.workcover.qld.gov.au/>
- National Occupational Licensing Authority [www.nola.gov.au](http://www.nola.gov.au)
- Queensland Government website at <http://www.qld.gov.au/>
- Department of Environment and Heritage Protection [www.ehp.qld.gov.au](http://www.ehp.qld.gov.au)
- Brisbane City Council, <http://www.brisbane.qld.gov.au/>,
- Townsville City Council, <http://www.townsville.qld.gov.au/>,

### South Australia:

- South Australia, RTW SA, [www.rtwsa.com](http://www.rtwsa.com)
- National Occupational Licensing Authority [www.nola.gov.au](http://www.nola.gov.au)
- SafeWork SA, [www.safework.gov.sa.au](http://www.safework.gov.sa.au)
- SA Central at <http://www.sa.gov.au>
- SafeWork SA, [www.safework.gov.sa.au](http://www.safework.gov.sa.au)
- Environment Protection Authority, [www.epa.sa.gov.au](http://www.epa.sa.gov.au),
- Department of Environment, Water and Natural Resources  
[www.environment.sa.gov.au](http://www.environment.sa.gov.au)
- WorkCover Corporation, [www.workcover.com](http://www.workcover.com)

### Western Australia:

- WorkSafe WA Commission, [www.safetyline.wa.gov.au](http://www.safetyline.wa.gov.au)
- Work Cover WA, [www.workcover.wa.gov.au/](http://www.workcover.wa.gov.au/)
- Commonwealth Workers Compensation, [www.docep.wa.gov.au](http://www.docep.wa.gov.au)



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- Western Australia Government website at <http://www.legislation.wa.gov.au>
- Environment Protection Authority of WA [www.epa.wa.gov.au/](http://www.epa.wa.gov.au/)
- Department of Commerce WA, [www.docep.wa.gov.au](http://www.docep.wa.gov.au)
- WA Department of Environment & Conservation [www.dsd.wa.gov.au/6743.aspx](http://www.dsd.wa.gov.au/6743.aspx)

**Major Suppliers**

Ashley Services Group major suppliers provide services that are listed in the table below. These provide long term and stable supply to enable the organisation to achieve its objectives. None of the suppliers are based outside of Australia.

**Modern Slavery Assessment Framework**

Since the last report the company has further sharpened and refined its selection processes for all suppliers, to ensure that the requirements of modern slavery are reflected in our vetting, evaluation and on boarding processes. The matrix below is applied to all supplier assessments.

	A	B	C	D
Quality	No Quality Concerns & Continually improves the product	No quality problems	Minor problems or rejects	Major Issues
Price	Adds value or price reductions in real terms	Competitive	Expensive	Premium Price
Service	No Service Issues & Pro-active, takes an interest in our business	Available when required, quick to respond	Late deliveries or difficult to contact	Unresponsive, not interested in problems
Safety	No Safety Concerns & is pro-active in addressing	No Safety Issues	Will comply with our policy	Disinterested with Safety issues



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	safety issues			
Enviro	No Environmental Concerns & is pro-active in addressing Environmental issues	No Environmental Issues	Will comply with our policy	Disinterested with Environmental Issues
Sustainability & Ethical Sourcing	No Sustainability Concerns & is pro-active in addressing Sustainability issues	No Sustainability Issues	Will comply with our policy	Disinterested with Sustainability Issues
<b>Modern Slavery &amp; Human Rights</b>	<b>Is pro-active and abides to the Modern Slavery and Human Rights Acts</b>	<b>No Modern Slavery and Human Rights Issues</b>	<b>Will comply with our Modern Slavery and Human Rights Policy</b>	<b>Disinterested with Modern Slavery &amp; Human Rights Issues</b>

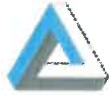
Table 1

<b>Supplier Name</b>	<b>Service</b>	<b>Modern Slavery &amp; Human Rights</b>
ACUTEST	MEDICAL	A
ADCAL SECURITY SERVICES PTY LTD	SECURITY	A
ASIC	CORPORATE	A
AUSTRALIS GROUP	MEDICAL CENTRES NSW	A
AZTEC OFFICE NATIONAL	STATIONERY	A
BLUE NRG ELECTRICITY	ELECTRICITY	A



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BRIDGE CLINIC	MEDICAL	A
BUSINESS FUEL CARDS PTY LTD	FUEL CARDS	A
CGU WORKERS COMPENSATION (VIC)	WORKCOVER VIC	A
CGU WORKERS COMPENSATION (WA)	WORKCOVER WA	A
CGU WORKERS COMPENSATION (ACT)	WORKCOVER ACT	A
CGU WORKERS COMPENSATION (NT)	WORKCOVER NT	A
CHUBB FIRE & SECURITY PTY LTD	SECURITY	A
CRAIG GORDON	TRAINING	A
CVA PROPERTY CONSULTANTS PTY LTD	CORPORATE	A
D-BIT AUSTRALIA PTY LTD	PAYROLL	A
DENA & LINGARD FAMILY TRUST PARTNERSHIP	CORPORATE	A
DHL SUPPLY CHAIN (AUSTRALIA) PTY LTD	CORPORATE	A
EML WORKERS COMPENSATION (NSW)	WORKCOVER NSW	A
EVISION PTY LTD	PAYROLL	A
FLEXIBLE TRAINING SOLUTIONS PTY LTD	TRAINING	A
GALLAGHER BASSETT (SA)	SA WC Claims Agent	A
GALLAGHER BASSETT (VIC)	VIC WC Claims Agent	A
GO WORKPLACE TRAINING	TRAINING	A
GRACE RECORDS MANAGEMENT	STORAGE	A
HOUSEPROUD CLEANING	CLEANING	A



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ICARE WORKERS COMPENSATION (NSW)	WORKCOVER NSW	A
INITIAL HYGIENE - QLD	CLEANING	A
INTEGRITY SAMPLING (NSW) PTY LTD	MEDICAL	A
IRON MOUNTAIN	STORAGE	A
JANI-KING (VIC) PTY LTD	CLEANING	A
JJ RICHARDS & SONS - ARNDELL PARK	WASTE	A
JLB MANAGEMENT CONSULTANCY PTY	CONSULTANCY	A
JOBFIT HEALTH GROUP PTY LTD	MEDICAL	A
JXT AUSTRALIA PTY LTD	CORPORATE	A
KB SAFETY SUPPLIES	UNIFORMS	A
KEATING LEHN SOLICITORS	CORPORATE	A
KILDARE ROAD MEDICAL CENTRE	MEDICAL	A
LAPEN PTY LTD	RENT	A
MAIL PLUS BLACKTOWN	CORPORATE	A
MAKESURE CONSULTING PTY LTD	POICE CHECKS	A
MET WEST MILK & SINGH FOODS PTY	MILK	A
MMGS SOFTNET PTY LTD	IT	A
NATIONAL CRIME CHECK	POLICE CHECKS	A
NEVERFAIL SPRINGWATER	WATER	A
O'HERNS ROAD MEDICAL CENTRE	MEDICAL	A
ONSITE DIAGNOSTICS P/L	MEDICAL	A
ORCHID AVENUE REALTY PTY LTD	RENT	A
PASPALIS INVESTMENTS PTY LTD	RENT	A



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PLATINUM ELECTRICIANS	ELECTRICIAN	A
PUROCLEAN PROPERTY SERVICES PTY LTD	CLEANING	A
QANTAS	TRAVEL	A
REMONDIS AUSTRALIA PTY LTD	WASTE	A
RENTOKIL PEST CONTROL	PEST CONTROL	A
RESILIUM INSURANCE	INSURANCE	A
RETURN TO WORK SA	WORKCOVER SA	A
RINMAX SERVICES	CLEANING	A
SAFEMAN AUSTRALIA PTY LTD	UNIFORMS	A
SEEK LIMITED	ADVERTISING	A
SHIXIAN WU & HUI LIN	CLEANING	A
SONIC HEALTHPLUS PTY LTD	MEDICAL	A
SUEZ RECYCLING & RECOVERY	WASTE	A
TELSTRA CORPORATION LTD	COMMUNICATION	A
TNT EXPRESS	TRANSPORT	A
TOTAL OFFICE NATIONAL	STATIONERY	A
TQCSI	ISO AUDITING	A
VIRGIN AIRLINES	TRANSPORT	A
WATERLOGIC	WATER	A
WORKPLACE ADVISORY GROUP	CORPORATE	A
WORKCOVER QLD	WORKCOVER QLD	A

All suppliers listed at table One have been fully assessed and rated as category A for modern slavery provisions.



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### Risks

***Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.***

Ashley Services Group's operations and supply chains fall across many industries and sectors but are limited to Australian-based operations. All suppliers must submit compliance statements; then are evaluated by the Group on a six-point scale that includes modern slavery criteria. All risk assessments and analyses are consolidated into an automated reporting system. Regular and periodic management reviews are conducted and acted upon at the highest levels of management in the Group.

Risks and opportunities are overseen and driven at the Board level through group responsibilities as a public company and at Head Office and each Branch at an operational level. They are often managed informally and monitored through monthly meetings; others are more formally organised through JLB Track and AW Track - automated tracking systems and handled expeditiously.

The risk assessment methodology is based on a Likelihood (5 criteria) x Consequence (5 measures) matrix resulting in five score levels. The same matrix applies to all risk assessments and is programmed into the JLB Track and AW Track systems.

Key indicators considered in assessing supplier risk are;

- Sector and industry risk
- product and service risk
- geographic risk, and
- entity risk.

Control and mitigation measures are anchored on;

- degree caused by the Group itself
- risk contributor to fight the Group, and
- risks linked to the Group.

In a mature environment of established risk management and practice, fully calibrated to modern slavery provision auditing, in a wholly domestic context, it is unlikely that the currently known supply chain has risks that meet the threshold for serious exploitation as defined by the Modern Slavery Act 2018. Consequently, the risk is assessed as low. Nonetheless, Ashley Services Group understands that;

- There is a possibility that presently assessed contracts and supply chains may develop links to modern slavery further down the supply chain where they are outside of the Group's visibility and control.
- The Group also understands that our visibility of practices in our complete downstream supply chain may be limited in sourcing some goods.



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- We also acknowledge that modern slavery risks may alter over time, requiring us to be attuned to broader developments.

However, as detailed above, we believe we have a very comprehensive and systemic approach towards doing everything possible to eliminate modern slavery risks and practices. Our position is non ambiguous, and all suppliers and staff are aware of, and trained on their personal responsibilities. Over the last reporting period we have either improved or produced the following instruments with an eye towards sharpening our Modern Slavery focus;

- Supplier Assessment record
- P – 01180 Customer Service Code of Conduct
- P 102 Corporate Social Responsibility Policy
- Ethical Sourcing Policy
- Human Rights and Modern Slavery Policy
- Whistleblower Policy
- Internal Audit template
- Supplier Assessment Instrument/checklist
- Modern slavery and ethical procurement training and awareness package (undertaken by 43 Head Office staff)

If at any time the Group becomes aware of Modern Slavery practices in our operations and supply chains used in the performance of contracts we ensure that the Supplier must as soon as reasonably practicable. This includes taking all reasonable action to address or remove these practices, including where applicable by addressing any practices of other entities in its supply chains.

### Controls

Ashley Services Group conducts the following to identify and control the risk;

- Scope and determine the Group's structure, businesses and supply chains utilising the existing risk assessment methodology.
- Formulate policies and procedures concerning modern slavery; including but not limited to;
  - collating current policies,
  - identifying gaps,
  - adapting existing policies and
  - formulating new policies as required.
- Systemic risk assessment – highlighting business operations and supply chains where there is a risk of modern slavery taking place;



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- Assessing and managing identified risks – i.e., carrying out further due diligence in group operations and supply chains and reviewing and adapting contract terms and codes of conduct with suppliers;
- Establishing processes and KPIs to monitor the effectiveness of the steps taken to ensure that modern slavery is not taking place in the business or supply chains.
- Implementing remedial steps where modern slavery is identified.
- Operating a comprehensive training and awareness program.
- Gaining applicable third-party certification and audit.



### Evaluation

***Describe how the reporting entity assesses the effectiveness of these actions.***

Incorporating specific processes and checklists to assess and address risks is a long-standing custom and practice of the Group. However, the inclusion of modern slavery is a relatively new undertaking. To evaluate these processes' effectiveness, we have undertaken a phased strategy for the entire procurement life cycle.



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Compliant operating baseline: Ashley Services Group is meeting the risks of modern slavery practices in its operations and supply chains through strict procurement and operational procedures, in line with legislation and procurement guidelines and policy. This is combined with formal certification to leading global ISO benchmarks, in particular ISO 20400 Sustainable Procurement and The TQCSI HR Compliance Code.

The organisation successfully received a Certificate of Compliance to both of these new standards in June 2021 making us a pioneer in this field. The audit indicated that operating system is sound and aligns with the requirements of ISO 20400. This global standard indicates that we operate an organised and ethical procurement system. The audit concluded that we have a transparent mechanism for supporting ethical procurement in place; with a range of existing methods being utilised to ensure that the supply chain operates within the company's expectations and as per wider expectations.

Awareness: A Training Skills Matrix/Register (otherwise known as a Training Matrix or Training Register, Skills Matrix or Skills Training Matrix) is maintained by each branch and state office to ensure training needs are recorded and continual improvement in personnel skill occurs. To ensure alignment and the identification of additional risks, pertaining to Modern Slavery; all appropriate staff have completed awareness training (now embedded into the Training Matrix). This training is aligned to the Australian Government Addressing Modern Slavery in Government Supply Chains toolkit. It focusses on:

- what modern slavery is,
- what modern slavery looks like in supply chains,
- what we can do to address modern slavery risks further, and
- how to report concerns about modern slavery practices.

External Assessment and Certification: The Group has now gained additional external audit/certification in;

- Human Resources Compliance Code (TQCSI)
- ISO 20400 Sustainable Procurement Certification

Successful gaining of HR Compliance certification confirms that we have a comprehensive HR compliance structure, operating ethically as per our legislative responsibilities. This is supported by a system of policies, procedures, feedback channels, training, and development, and monitoring of the system. This includes a



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full package of Modern Slavery, Human Rights and Ethics training and awareness undertaken by all head Office and leadership staff.

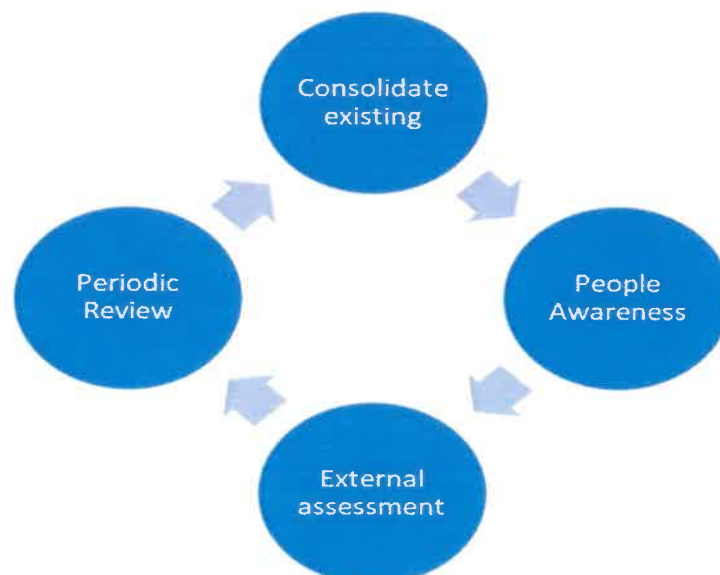
ISO 20400 supplements our activities. It provides guidelines for integrating sustainability into our procurement processes. Aimed at top managers and directors of the purchasing function, it covers the political and strategic aspects of the purchasing process, namely, how to align procurement with our strategic goals and objectives to create a culture of sustainability. The standard defines the principles of sustainable procurement, including accountability, transparency, respect for human rights and ethical behaviour, and highlights key considerations such as risk management and priority setting. It also covers various stages of the procurement process, outlining the steps required to integrate social responsibility into the purchasing function.

These new compliance codes are critical parts of our strategy to ensure that we remain grounded in what we deliver, and that we are subject to scrutiny from a neutral third-party organisation.

These are in addition to our existing certifications.

- ISO 9001:2025 Quality Systems
- ISO 14001:2015 Environmental Systems
- ISO 45001:2018 WHS Systems

Conduct Periodic reporting and review to the Board and executive: The group operates under a continuous improvement lens at every stage of its operating processes.





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### Consultation

**Describe how the reporting entity consulted on its Statement with any entities it owns or controls.**

The Ashley Services Group undertook a risk-based approach to consultation with owned or controlled entities to prepare this Statement. We launched targeted consultation enabled by our centralised risk/assurance/quality system. The Group operates under a consolidated quality assurance and quality improvement framework. As the world's most useful quality management system standard, ISO 9001:2015 is our framework to continually consult, monitor and manage operations across the Group to achieve consistency and meet our obligations.

Consequently, extensive consultation and integration leading to this Statement were conducted through an effective and transparent system. This ensures that there is no deviation across the Group in any of its subordinate entities.

A full-time manager is dedicated to the integrated management system and maintenance of the system, which now includes;

- ISO 9001 Quality
- ISO 14001 Environment
- ISO 45001 WHS
- ISO 20400 Sustainable Procurement
- TQCSI HR Compliance Code

### Any other relevant information

The Ashley Services Group treats its Modern Slavery responsibilities very seriously. The Group's approach has been one of; fully understanding the risk dimensions, implementing comprehensive policies and procedures, operating in a mature and systemic risk assessment and control environment, and seeking external certifications to ensure third-party scrutiny of our operations. We consider this to be a constant work in progress. Our policies and procedures and procurement instruments are constantly under review, and we are undertaking an ongoing program of awareness and capability training and development.

Since our last return was lodged, the Group has been navigating a period of acceleration and consolidation. This has partly been anchored on the gaining of global certification benchmarks and the incorporation of all of the principles of Modern Slavery and Ethical Procurement into our operating system. The demands of Modern Slavery in particular are now;

- established in our targets and objectives,



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- supported through training and awareness that is now embedded into our training matrix,
- guidance is provided by a new set of policies and procedures,
- all suppliers are fully evaluated with a specific category created for modern slavery,
- our internal and external audit programmes particularly focus on modern slavery,
- Our management review process regularly tracks our progress in this space.

**Approved and Endorsed by the Board**

**Managing Director: Ross Shrimpton**

**Signed by the Managing Director:**

**Date:** 16 Nov 2021