

PROBE GROUP

MODERN SLAVERY STATEMENT

FY22

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AT THE HEART OF PROBE'S VALUES ARE PURPOSE, PEOPLE AND PASSION.

At Probe we are committed to acting ethically and improving our practices to combat slavery in accordance with the Modern Slavery Act 2018 (Cth) and to implementing effective processes to ensure, so far as reasonably possible, that modern slavery is not taking place in our business or operations and in any of our supply chains.

This is our third joint Modern Slavery Statement which sets out the steps the Probe Group have taken to address modern slavery risks in our business for the financial year ending 30 June 2022 in accordance with the Modern Slavery Act 2018 (Cth) and is made on behalf of Probe BPO 1 Pty Ltd and its wholly owned subsidiaries including, but not limited to, Probe Contact Solutions Australia Pty Ltd ACN 006 688 955, Probe Operations Pty Ltd ACN 624 615 925, Probe Asia Pacific Pty Ltd 86 082 618 148, Convai Pty Limited ACN 002 561 515, Convai New Zealand Limited, Probe Contact Solutions New Zealand Limited, Beepo Support Services Pty Ltd ACN 167 554 967, Beepo Inc, Probe's Microsourcing operations including

Microsourcing International Ltd, Probe Contact Philippines Inc, Probe Group Philippines Inc and Probe North America LLC. For the purposes of this joint statement, Probe or Probe Group refers to all reporting entities.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under Australian modern slavery legislation. We expect the same high standards from all of the contractors, suppliers and other business partners who do business with us.

OUR BUSINESS AND ORGANISATION STRUCTURE

We are proud to be a global provider of outsourced customer experience, sales, help desk and digitally-enabled contact centre services in the business process outsourcing sector, delivering a broad range of leading customer contact, end-to-end credit management and collections solutions to our valued clients.

Our tech-enabled, empowered, and engaged workforce delivers global customer contact solutions servicing 21 countries, seamlessly and reliably. Over 40+ years, the combination of people, technology & our passion culture has driven us to deliver best-in-class contact centre environments, leading the way when it comes to customer experience, results, continuous improvement, innovation and insights.



OUTSOURCING

CONTACT CENTRE

CREDIT & COLLECTIONS

BACK OFFICE

STRATEGY

CX & CUSTOMER MANAGEMENT

KNOWLEDGE MANAGEMENT

CONSULTING

TECHNOLOGY

INTELLIGENT AUTOMATION

IVR AND NLP TECHNOLOGY

BUSINESS INSIGHTS & ANALYTICS

In preparing this statement we have acted collaboratively and in consultation with wholly owned subsidiaries of Probe BPO 1 Pty Ltd with whom we make this joint statement by virtue of our Ethical Supply and Anti-Slavery Committee and consistent due diligence processes throughout our group established by our In-house Legal and Compliance team. As the entities within the Probe Group use similar policies and processes and operate in the same sector with many shared suppliers, we will provide a consolidated description of the actions our Group are taking to address modern slavery risks.

Our business is organised into 7 business units:

- **Contact Solutions**
- **Operations**
- **Field Services**
- **Collections**
- **Convai**
- **Microsourcing**
- **Beepo**

Our head office is based in Melbourne, Victoria. Probe Group has over 18,000 employees and we deliver services in Australia, New Zealand, the United States, the Philippines and India.

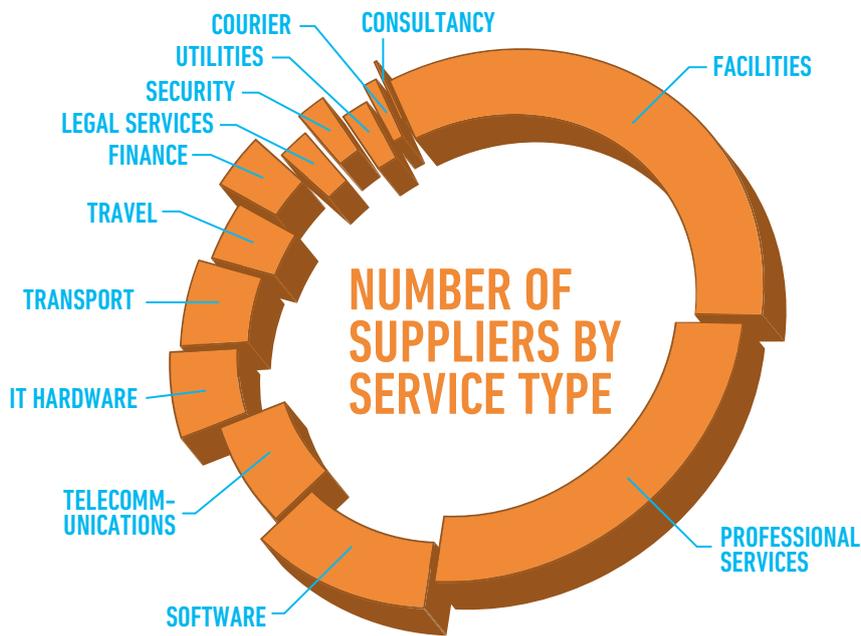
At Probe, we have a NEXT GEN culture which seeks to attract and retain reliable, respectful and ethical employees. Our people are central to achieving our vision of being the most sought after and respected Customer Management (BPO) services provider in the markets within which we choose to operate. Probe is committed to ensuring its people work under conditions that comply with all national, local and international labour standards and laws and codes of the countries in which it operates.

OUR SUPPLY CHAINS

In FY22, Probe Group worked with approximately 750+ suppliers. 75% of our suppliers is within facilities (includes office supplies and services), professional services and IT. These figures reflect the importance of our suppliers to our overall business success.

Due to the nature of our operations we have a relatively simple supply chain which includes goods or services needed for

our day to day operations including office supplies, office services (postage, cleaning, fire protection, security, waste disposal and maintenance services etc), leasing of facilities, IT infrastructure and software, office equipment, telecommunications and utility services and professional services (including external auditing and legal services, transport, locksmith, recruitment and consulting services).



KEY SUPPLIER SOURCE LOCATIONS



OUR POLICIES ON SLAVERY

We are committed to ensuring, so far as reasonably possible, that there is no modern slavery in our supply chains or in any part of our business. Probe's commitment to anti-slavery is reflected in various corporate policies which seek to prevent dishonest or unethical conduct and fostering a culture of honesty and accountability including the following:

- **Code of Ethics and Conduct**
- **Anti-Slavery Policy**
- **Recruitment Policy**
- **Corporate Social Responsibility Policy**
- **Procurement Policy**
- **Whistleblower Policy**

Our Anti- slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in our supply chains.

This commitment is also reflected in our Supplier Code of Conduct. We require all Suppliers to act in a manner consistent with our XTRA philosophy including with xtra value, xtra performance and xtra integrity.

MODERN SLAVERY RISKS

Probe is committed to human rights and understands the important role our business plays in contributing towards the global elimination of modern slavery and human trafficking.

Probe Group procures a range of goods and services both from Australia and internationally. Probe Group conducted a risk assessment of modern slavery taking into account supplier geographical location and known industry risks.

We anticipate that due to our global operations our purchase of goods and services may potentially be susceptible to risks of modern slavery particularly in the areas of:

- the procurement of computer hardware which is manufactured offshore; and
- the procurement of labour in services, such as cleaning.

Probe did not identify any cases of modern slavery in our operations or supply chain within this reporting period.

Probe Group manage risks to our organisation by maintaining consistent risk mitigation processes to monitor for and avoid modern slavery in all environments in which we operate in. This includes undertaking due diligence on existing and potential suppliers and ensuring we have a robust training framework in place.

IMPACT OF COVID-19

As we prepare this statement, our business and our suppliers continue to deal with the impact of COVID-19. We recognise that human rights challenges have increased throughout the pandemic due to the impact of the COVID-19 pandemic as workers in supply chains have likely become more vulnerable during this time and the majority of employees worked remotely.

A majority of Probe employees worked from home this year to enable employees to continue to work and earn a wage during this period and to provide continuity of services to Probe clients.

Communication continued to be a large focus in 2022 ensuring employees have access to up to date information on how to stay safe and minimise the risk of COVID-19.

The safety and wellbeing of our employees and visitors has been a primary focus this year with continued COVID-19 cases in the geographies in which we operate. Probe has complied with world health organisation recommendations and government health directions in order to protect employees and visitors during lockdowns.

With varying government support and policies on COVID-19 vaccination we have focused on the impact of employees in the Philippines with increased COVID case numbers at certain periods during the reporting year. We

implemented remote work arrangements to promote safe working practices and purchased vaccines and made these available for free to our Philippine employees. Health kits including PPE and multivitamins were sourced for some team members along with the option to use the company shuttle service where available to promote safety for team members. Onsite medical personnel as well as online assistance was also made available to support Philippine based team members.

We have partnered with Sonder, an innovative wellbeing and safety organisation to provide free and confidential support and guidance for employees who need assistance to support mental health, well-being and physical safety with human help every second of every day, whenever and wherever it's needed.

We have been mindful of the Impact of COVID-19 on our suppliers and their workforce particularly dealing with the impact of shutdowns. We have endeavoured to ensure where possible we didn't terminate any supply contracts due to the Impact of COVID-19. Maintaining supplier relationships has been a key focus during this reporting period.



DUE DILIGENCE PROCESSES FOR ETHICAL SUPPLY AND ANTI-SLAVERY

Probe is committed to implementing and maintaining standards of good governance where we undertake our business activities in an ethical and transparent manner consistent with applicable laws. This extends to the Suppliers with whom we do business.

We have in place systems to:

- **identify and map our supply chain;**
- **assess and monitor potential risk areas in our supply chains;**
- **mitigate the risk of slavery occurring in our supply chains; and**
- **protect whistleblowers.**

As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain, we undertake a risk assessment of suppliers to identify and understand our modern slavery risks. As part of our supply chain risk analysis we seek to identify:

- suppliers and partners located in high risk countries where labour rights are not protected;
- suppliers and partners who we spend the most within our supply chain;

- high-risk industries that have previously been affected by undeclared labour, illegal labour and/or a high incidence of trafficked persons;
- where there is temporary labour;
- where there are sub-contractors or temporary agency staff.

A risk rating is then attached of low, medium or high risk for each supplier/partner based on publicly available information about indicators of modern slavery. To date our focus in our supply chain mapping and risk assessment has been on direct suppliers.

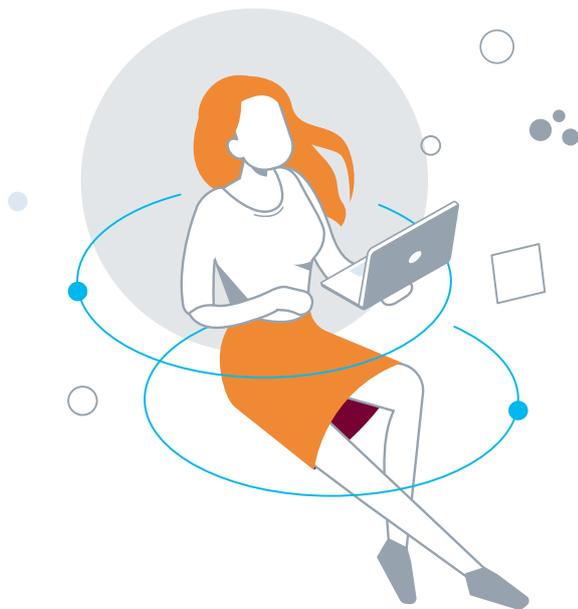
In keeping with our standards of transparency and ethical conduct, we actively encourage everyone in our business to challenge any behaviour they believe is inconsistent with any of our values or our policies. The Probe Group also has mechanisms in place for employees or third parties to anonymously report suspected or actual improper conduct through our Whistleblower Policy which is published on our website. Protected disclosures can be made through internal reporting processes or via the Probe Group stopline service.

SUPPLIER ADHERENCE TO OUR VALUES

It is the expectation that all Suppliers act honestly, fairly and without prejudice in all business dealings, avoiding conflicts of interest and acting with integrity. Probe expects all suppliers whether directly or through their supply chain, to comply with all applicable modern slavery laws, including not engaging in human trafficking, slavery, servitude, forced labour, debt bondage and child labour as noted above. Human rights abuses are not permitted in any form in our supply chain.

To ensure our suppliers and contractors comply with our ethics we have established

a Supplier Code of Conduct which details the standards expected of our Suppliers and their supply chains, when providing goods and services to or on behalf of the Probe and applies to any third party providing products or services to or on behalf of Probe. Our Supplier Code of Conduct was reviewed this year to ensure it continues to remain relevant to the standards expected of Probe suppliers. The Supplier Code of Conduct is published on our Probe Group website and is an important part of our approach to ethical and responsible procurement.



TRAINING

Training is a fundamental part of Probe’s efforts to raise awareness and to implement anti-slavery and corporate social responsibility policies effectively.

To promote employee awareness all employees who are involved in procuring goods and services are required to complete Probe’s Modern Slavery compliance training module.

Probe’s training and awareness program seeks to ensure that team members involved in sourcing goods and services have an understanding of what is modern slavery and how to spot risks and report incidents.

OUR ACTIONS & ACHIEVEMENTS

We are proud of the steps we have taken to combat modern slavery within our operations. Measures we have implemented and continuously improving in FY22 include:

Our Anti-Slavery Policy has been reviewed and published for this year. We have established a new Code of Ethics and Conduct which confirms, amongst other things, our commitment that all Probe employees respects human rights and adhere to applicable modern slavery laws.

We have undertaken a comprehensive risk assessment with our People Team to assess modern slavery risks within our internal operations and recruitment processes.

Development of a new Infographic to be shared with suppliers on modern slavery to raise awareness of modern slavery risks within our supply chain.

We conducted a comprehensive modern slavery risk review to understand existing and emerging risk areas. All suppliers have been classified with a risk rating. We have approximately 750+ suppliers and approximately 66% have been assessed as low risk.

Training and awareness has been another important pillar in our modern slavery due diligence. We have successfully developed the awareness and knowledge of our employees who are engaged in the procurement of goods and services to ensure that their decisions and actions align with Probe's commitment to respect human rights.

We have reviewed and updated our Procurement Policy to include minimum terms for new third party suppliers which expressly cover the requirement for service providers to take reasonable steps to review their business for modern slavery or human trafficking and all related compliance and to comply with applicable modern slavery laws.

Probe continues to map key suppliers by location and spend. All high risk suppliers have been assessed for modern slavery related risk.

Due diligence has been undertaken on nominated suppliers who were required to complete a questionnaire that was reviewed by Probe's Legal and Compliance Team.

Membership with SEDEX renewed

A critical development in our modern slavery response over the past year has been the group wide support for our Ethical Supply and Anti-Slavery Committee. This brings together representatives from all Probe businesses including employees who represent key functions. This work has received support from our CEO and the Leadership Team.

EFFECTIVENESS IN COMBATTING SLAVERY

We are committed to continuous improvement and looking at how we can improve our modern slavery framework. We are tracking the effectiveness of our actions through our Anti-Slavery and Ethical Supply Committee. The Committee is responsible for, amongst other things, tracking and reviewing our progress on implementation of modern slavery initiatives and achievement of anti-slavery goals.

We continue to focus on training completion and evaluating the best options for measuring the effectiveness of our modern slavery initiatives and actions. The following key performance indicators which were achieved:

- 100% of suppliers being assessed for modern slavery risk;
- review and update of our Procurement Policy including the introduction of supplier standard terms which expressly cover modern slavery;
- continuation of Probe's Ethical Supply and Anti-Slavery Committee;

- development of a modern slavery infographic designed to promote awareness amongst suppliers. The distribution of this infographic will be a focus of our FY23 initiatives;
- completion of risk assessment in consultation with the People Team focused on risks in Probe Group internal operations, such as recruitment and the use of external agencies; and
- review and update of our Supplier Code of Conduct to ensure the Code remains relevant and up to date whilst considering any trends in modern slavery issues and the risks posed to Probe Group

The effectiveness of efforts to minimise the risk of modern slavery will be regularly assessed and reviewed by our Ethical Supply and Modern Slavery Committee who meet several times each year. One of our core key performance indicators for FY 23 is to promote awareness with our suppliers of modern slavery risks.

EFFECTIVENESS IN COMBATTING SLAVERY

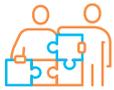
Area	Item	Measurement or Effectiveness
Awareness	<ul style="list-style-type: none"> Ensuring modern slavery awareness training is provided for all staff engaged in procuring goods or services to raise awareness and to implement Probe’s anti-slavery policies effectively. 	<ul style="list-style-type: none"> Number of relevant staff who have received training on modern slavery risks.
Policies	<ul style="list-style-type: none"> Ensuring applicable Probe policies confirm Probe Group expectations in regards to preventing modern slavery in Probe’s operations and supply chains. 	<ul style="list-style-type: none"> Policies reviewed annually to identify any opportunities for improvement. Supplier access to Probe policies related to modern slavery.
Supply Chain Register and Due Diligence	<ul style="list-style-type: none"> Monitoring of supply chain with maintenance of Probe Group supplier register. 	<ul style="list-style-type: none"> Percentage of suppliers who have been assessed for modern slavery risks. Completion of modern slavery questionnaires where identified as required from modern slavery risk rating.
Risk Management	<ul style="list-style-type: none"> Understanding exposure both within Probe Group operations and externally in our supply chain. 	<ul style="list-style-type: none"> Completion of annual risk assessment.
Commitment	<ul style="list-style-type: none"> Establishing the Anti-Slavery and Ethical Supply Committee 	<ul style="list-style-type: none"> Anti-Slavery and Ethical Supply Chain Committee to monitor progress against our action plan, collaborate and discuss about current trends or issues and also a platform to discuss future plans and initiatives.
Internal Reporting	<ul style="list-style-type: none"> Reporting of our progress to our Group’s leadership team. 	<ul style="list-style-type: none"> Quarterly update to be provided to our Group’s leadership team

PROBE GROUP GOALS TO FY23

Following a review of the effectiveness of the steps we have taken this year to minimise the risk of slavery in our operations and supply chains we have committed to taking the following further steps to combat slavery in our supply chain in FY23 and build upon the work completed in 2022:



Introduce standard supplier terms where possible in supplier contracts.



Promote awareness amongst small suppliers by distributing Modern Slavery information sheet/infographic for small suppliers and how modern slavery might affect their businesses.



Review our Supplier Code of Conduct to ensure it remains relevant and up to date while considering any trends in modern slavery issues and the risks posed to Probe Group.



Review and enhancement of new and existing supplier engagement and risk assessment processes.



Invest in a centralised group risk compliance tool that will enable us to efficiently send out and track supplier modern slavery questionnaires.



Further review of documentation, i.e. policy, procedures and guidance materials across operations and supply chain.



Performing audits of our Supplier Register to ensure completeness of records and compliance to the risk assessment procedure.

The effectiveness of our program will be measured in FY23 based on implementation of the above initiatives.

Consistent with our “doing it better” approach we are committed to continuously review the initiatives we have implemented as a group to minimise the risk of modern slavery within our supply chain.

This joint modern slavery statement is made by Probe BPO 1 Pty Ltd and its wholly owned subsidiaries and was approved by the Probe Group Board of Directors on 23 November 2022.

Andrew Hume
CEO

Probe BPO 1 Pty Ltd
24 November 2022

MODERN SLAVERY STATEMENT 2022

REFERENCE SCHEDULE

Clause	Mandatory Criteria	Reference in Probe's Statement
1(a)	Identify the reporting entity	Page 3 - 'Probe entities are listed'
1(b)	Describe the structure, operations and supply chains of the reporting entity	Page 3 - 'At the Heart of Probe's Values and Purpose, People and Passion' Page 4 - 'Our Business and Organisation Structure' Page 5 - 'Our Supply Chains'
1(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Page 6 - 'Modern Slavery Risks'
1(d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Page 8 - 'Due Diligence Processes for Ethical Supply and Anti Slavery' Page 10 - 'Our Actions and Achievements'
1(e)	Describe how the reporting entity assesses the effectiveness of such actions	Page 11 - 'Effectiveness of Combatting Slavery'
1(f)	Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14--the entity giving the statement	Page 4 - 'Our Business and Organisation Structure'
1(g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Page 6 - 'Our Policies on Slavery' Page 7 - 'Impact of COVID-19' Page 9 - 'Supplier Adherence to Our Values' Page 9 - 'Training'
2(a)	A modern slavery statement, other than a statement to be given under section 15 (Commonwealth modern slavery statements), must include (a) for a statement to be given under section 13 (modern slavery statements for single reporting entities)--details of approval by the principal governing body of the reporting entity; or	N/A
2(b)	for a statement to be given under section 14 (joint modern slavery statements): (i) details of approval by the relevant principal governing body or bodies; (ii) if subparagraph 14(2)(d)(iii) applies--an explanation of why it is not practicable to comply with subparagraph 14(2)(d)(i) or (ii).	Page 13 - 'Probe Group Goals to FY23' confirms the statement has been approved by the Probe Group Board of Directors.