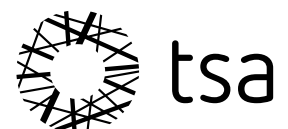


Modern Slavery Statement 2022



TSA Group

December 2022



Contents



| | |
|--|----|
| Scope..... | 3 |
| Consultations | 3 |
| About TSA Group..... | 4 |
| <i>Structure and operations</i> | 4 |
| <i>Locations</i> | 4 |
| <i>Supply chains</i> | 5 |
| <i>Commitments</i> | 5 |
| Labour and human rights policy | 7 |
| Risk of modern slavery practices..... | 8 |
| Actions taken to assess and address risks of modern slavery practices..... | 9 |
| Assessment of effectiveness..... | 11 |
| Approvals | 12 |

This page is deliberately left blank.

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 and Trimatic Management Services Pty Ltd as trustee for the Trimatic Management Services Unit Trust. In this Statement, these entities will be collectively referred to as the TSA Group.

This inaugural Statement pertains to the financial year ending 30 June 2022.

Consultations

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

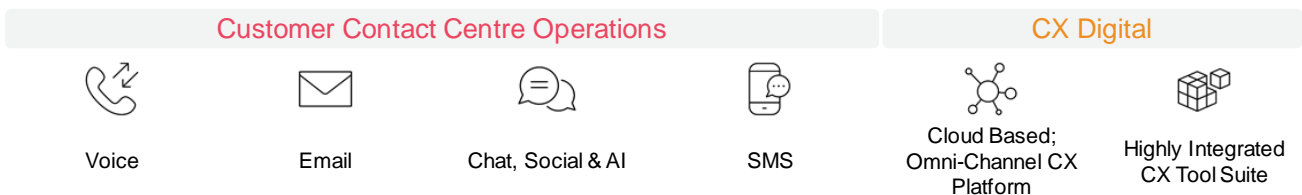
| Name | ABN |
|---|----------------|
| Telco Services Australia Pty Ltd | 31 106 527 422 |
| Telco Sales Australia Pty Ltd | 50 153 951 841 |
| Trimatic Management Services Pty Ltd (as trustee for the Trimatic Management Services Unit Trust) | 20 107 003 636 |
| TSA Australia Pty Ltd | 81 106 029 976 |
| 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

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.

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



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

Actions taken to assess and address 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

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. 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.

Following a review of the effectiveness of our actions in respect of modern slavery, we intend to;

- Draft and implement a modern slavery policy, supporting our existing CEO statement on modern slavery
- Draft and implement a supplier code of conduct that is aligned to the TSA Group values (known as 'TSAWays'), including a commitment to mitigate risks of modern slavery within our supply chains
- Implement a standardised vendor induction program including risk-based assessments when vetting existing and potential suppliers that incorporates:
 - Analysis of publicly available information pertaining to indicators of modern slavery;
 - Responses to the supplier questionnaire; and,
 - Acceptance of the TSA Group supplier code of conduct
- Raise awareness of this topic and our obligations by providing accessible training to our employees, with enhanced training for employees directly involved in procurement activities

Approvals

The TSA Group Modern Slavery Statement, covering the TSA Group's activities for the financial year ending 30 June 2022, has been approved by the Board of Directors on 14 December 2022.



Tim Ungar
Chairman



Luke Kenny
Executive Director

Thank you

Inspired
Customer
Experience