

# MODERN SLAVERY STATEMENT

**2023**

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) and constitutes the statement on behalf of Acquire BPO Pty Ltd for the fiscal year that ended 30 June 2023

No instances of modern slavery were reported or identified across our operations or supply chain throughout the reporting period.



# Contents

Our commitment against modern slavery.....	<b>3</b>
Our corporate structure, operations, and supply chain.....	<b>3</b>
Consultation.....	<b>4</b>
Our supply chains.....	<b>6</b>
Risk of modern slavery.....	<b>7</b>
Due Diligence and Risk Management Process.....	<b>7</b>
Preventing modern slavery in our business.....	<b>8</b>
Modern slavery training.....	<b>8</b>
Our effectiveness in combating slavery.....	<b>9</b>
Further steps and remediation.....	<b>10</b>

# Our commitment against modern slavery

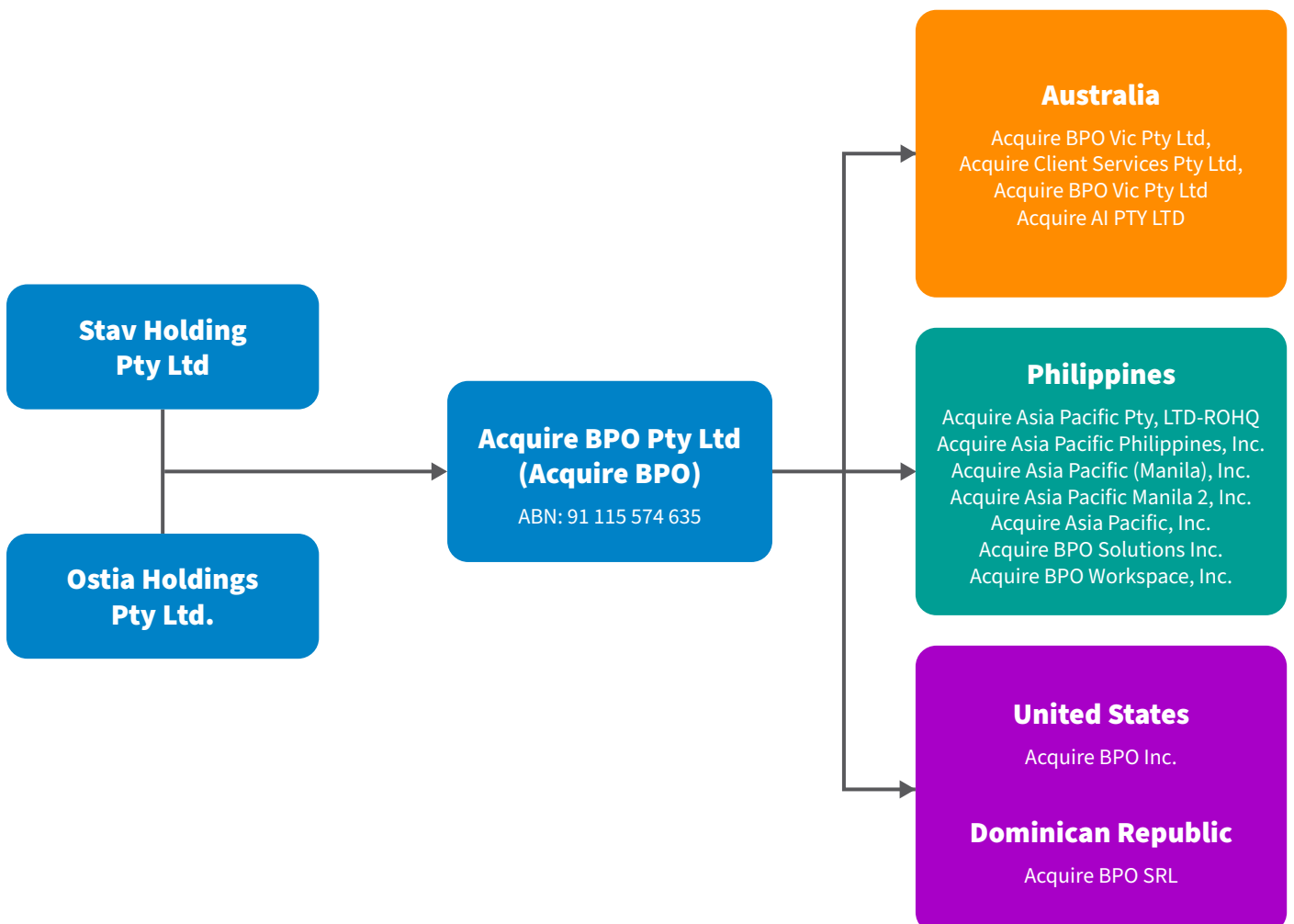
Acquire BPO Pty (Acquire BPO) and its subsidiaries are committed to acting ethically and with integrity in all its business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery does not take place anywhere in our business or any of our supply chains.

We are also committed to ensuring there is transparency in our business and our approach in addressing modern slavery is consistent with our disclosure obligations under Australian modern slavery legislation. We expect the same high standards from our contractors, suppliers, and business partners. As part of our contracting process, we may include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude, or debt bondage, whether adults or children. We expect that our suppliers hold their partnerships to the same standards.

This Modern Slavery Statement is made by Acquire BPO Pty Ltd and its subsidiaries for the financial year that ended in June 2023.

# Our corporate structure, operations, and supply chain

Acquire BPO Pty Ltd with the brand name Acquire BPO is a company limited by shares, incorporated and domiciled in Australia. Acquire BPO is directly owned by Ostia Holdings Pty Ltd. and Stav Holdings Pty Ltd, respectively. The office headquarters and registered address is at Level 15, 10 Queens Road Melbourne, VIC 3004. Acquire BPO has existing subsidiaries in Australia, the Philippines, the United States of America, and the Dominican Republic.



Acquire BPO was established in 2005 as a captive environment by two entrepreneurs in response to the lack of offshoring providers with a high-quality solution. Acquire BPO has since evolved into a full-scale outsourced contact centre and BPO enjoying exponential growth year on year. Today, our company employs 7000+ experienced professionals and operates from 11 state-of-the-art locations in Australia, the Philippines, the United States, and the Dominican Republic. We serve a wide range of industries including telecommunications, banking & financial services, insurance, media, education, and retail. These services include customer service, sales, technical support, retention campaigns, back-office functions, software development and marketing services for private and publicly-listed companies around the world—helping them to optimise costs, develop operational performance, increase productivity and efficiency, and obtain flexibility in staffing and workforce.

Our business is organised accordingly:

### Australia

- An Australian entity (Acquire BPO Pty Ltd) is responsible for the overall governance of the entities in the Philippines, the US, and the Dominican Republic.
- Acquire BPO Pty. Ltd. is responsible for the Australian operations, which also includes subsidiaries Acquire BPO Vic Pty Ltd, Acquire Client Services Pty Ltd, Acquire BPO Vic Pty Ltd

### Philippines

- Philippine-based entities (Acquire Asia Pacific Pty, LTD-ROHQ, Acquire Asia Pacific Philippines, Inc., Acquire Asia Pacific (Manila), Inc., Acquire Asia Pacific Manila 2, Inc., Acquire Asia Pacific, Inc., Acquire BPO Solutions Inc., Acquire BPO Workspace, Inc.), are responsible for the offshore business process outsourcing services for the English-speaking market.

### US and Dominican Republic

- The US entity (Acquire BPO Inc.) and the Dominican Republic (Acquire BPO SRL) are responsible for the offshore business process outsourcing service for the US and Spanish-speaking markets.

## Consultation

We have acted in consultation with the entities listed above in preparing this statement by sharing details of key suppliers/vendors and the associated spending.

During the reporting period this statement covers, we actively engaged and consulted with all companies we own or control in the development of this statement (entities outlined and listed above in our corporate structure). We discussed details of the Modern Slavery Act 2018's reporting requirements; and information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates. We also asked the process owners for updates on the initiatives we have implemented to mitigate the risk of modern slavery in the business. Policies and procedures that contain provisions designed to provide modern slavery controls were also reviewed and updated.





# Core purpose:

Powering businesses, to create a thriving global community

# Vision:

To connect the business world to skilled people globally

# Mission:

To be the partner of choice for corporate growth, by enabling businesses to leverage the best global resources at the right price

A genuine partnership approach is at the heart of what we do. Our onshore and offshore teams are highly proficient in exceeding expectations. We give our clients the capability to outsource with confidence with solutions that are



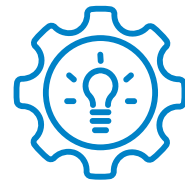
## Safe

- Strict data security, compliance and regulatory standards
- Employee safety and wellbeing
- Client brand synergy
- Trusted partner of choice



## Flexible

- Tailored & scalable outsourcing models
- Class A global workspaces
- Custom client fit-outs
- Flexible engagement options

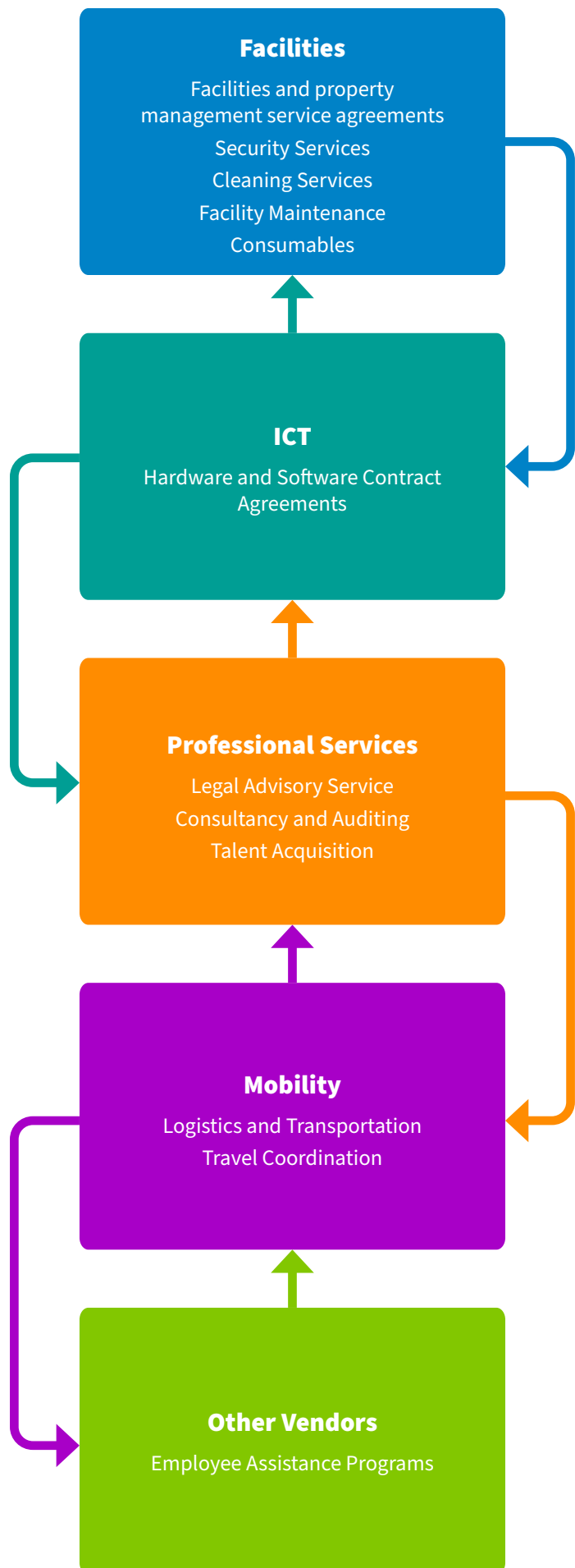


## Innovative

- Latest technology & vendor-agnostic approach
- Continuous improvement practice
- Automation & AI services
- Intelligence/data-driven change



# Our supply chains



Our supply chain involves the procurement of products and services globally and extensively across industry sectors. For the FY 2022-2023, we partner with eight hundred and fifty-nine (859) first-tier and second-tier suppliers from different countries. Given our size and geographic reach, ensuring we avoid any involvement in modern slavery (in particular, beyond first-tier suppliers), is a considerable challenge.

We have a Supplier Code of Conduct in place for all our suppliers and persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners. This underscores our commitment to acting ethically and with integrity and enforcing systems and controls that minimise the risk of modern slavery from occurring in our business or our supply chains.

## Risk of modern slavery

Slavery is a crime and a violation of fundamental human rights. It may happen in various forms, whether against adults or children, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. These may include servitude, forced and compulsory labour, forced marriage, debt bondage, and human trafficking.

The nature of the business of Acquire BPO being a business process outsourcing company involves hiring highly skilled talents which is vital in maintaining its day-to-day operations. Further, suppliers and third-party service providers are essential to support the needs of operations. We consider our operations and supply chain to have a potential modern slavery risk. We consider the modern slavery risk in our operations to be something we can directly control whilst the risk in our supply chain to be something we don't have direct control over but can be mitigated.

However, the risk of modern slavery at Acquire BPO is low as our recruitment, labour relations, procurement and compliance processes are stringent and aligned with the local laws and regulations where we operate. We exert effort to ensure that no human rights are violated in any form.

## Due Diligence and Risk Management Process

On an annual basis (Fiscal Year), suppliers are reviewed as part of Acquire BPO's due diligence against Modern Slavery. For order of priority, suppliers are categorised and reviewed per Spend Category and Risk Rating is formalized based on the inputs from the 2023 Global Slavery Index report published by Walk Free and the International Labour Organization.

Based on our developed risk profiling, our commitment to addressing the issue of modern slavery in our business and supply chains is communicated to suppliers, contractors, and business partners at the onset of our partnership and is reinforced, as appropriate, thereafter.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.

We're committed to conducting business in an open and accountable way and we expect our suppliers to:

- Act in an ethical, fair, and professional manner, both internally and externally, including with regard to how the community is affected by their business.
- Not offer gifts to gain improper advantage or preferred treatment in the supplier's business dealings.
- If possible, avoid (but always declare) any conflicts of interest that may impact commercial arrangements between the supplier and us.

We're committed to promoting a culture of health and safety awareness that ensures risks in the workplace are eliminated or controlled and we expect our suppliers to:

- Comply with all health and safety laws and regulations.
- Take proactive measures to prevent workplace risks (including providing appropriate training to enable workers to perform their jobs safely).

# Preventing modern slavery in our business

## Our Policy on Modern Slavery

This aims to establish Acquire BPO's commitment to acting ethically and with integrity in all its business dealings and relationships. Acquire BPO commits to implementing and enforcing effective systems and controls to ensure modern slavery does not take place anywhere in our business or any of our supply chains.

Under the Modern Slavery Act 2018, this policy forms part of Acquire BPO's ongoing efforts to limit the risks of modern slavery in its business and supply chains. Violations of the Acquire Modern Slavery Policy have severe consequences, and may result in actions being taken against:

- Employees, including disciplinary action, which may result in dismissal for misconduct or gross misconduct.
- Contractors or organisations we work with, including, but not limited to, termination of our business relationship with that entity.

## Whistleblower

The Company is committed to ensuring a culture of corporate compliance and ethical behaviour and encouraging Employees and others to report violations of those standards. This Whistleblower Policy details the framework for receiving, investigating, and addressing allegations of misconduct, or an improper state of affairs or circumstances about the Company.

Our Whistle-Blower Policy reflects our commitment to discovering instances of modern slavery or other issues within our business and supply chains. It ensures whistle-blowers are given protections aimed at encouraging whistle-blowers to come forward.

# Modern slavery training

Training is important in enforcing the Modern Slavery Practises of Acquire BPO. An online learning module is in place to promote modern slavery awareness in the organisation. This includes training on how to identify modern slavery practices and the parts of our business and supply chains that may be subject to a greater risk of modern slavery practices. This training will also form part of the induction process for all individuals who work for us, whether as employees or contractor





## Our effectiveness in combating slavery

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery is not taking place in any part of our business or supply chains.

- Vendor accreditation is present where the supplier is assessed if compliant with Acquire BPO's Modern Slavery and Responsible Procurement Policy. For the last fiscal year, 100% of the new vendors have complied with the Acquire BPO's Modern Slavery Policy.
- Annually review our existing supplier roster based on spend and risk.
- No issues are identified with modern slavery compliance in the screening of suppliers, except for the delay of submission of accreditation requirements.
- No modern slavery concerns are reported through our Whistle-blower channels.
- No complaints received or identified from our Human Resources and Recruitment Process that could indicate that modern slavery exists in the business.
- Our total employee population of Acquire globally has access to modern slavery training.

We manage these risks to our organisation by maintaining consistent and high standards of due diligence and risk mitigation processes to monitor for and avoid modern slavery in all environments in which we operate, regardless of whether the environment or the suppliers with whom we work are vulnerable to modern slavery.



## Further steps and remediation

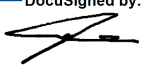
Following a review of the effectiveness of the steps, we have taken to ensure that there is no slavery in our supply chains. We will continue taking remedial steps to combat slavery in our operations and supply chain.

Our Compliance Department is responsible for monitoring and auditing internal controls and procedures to mitigate the risks of modern slavery practices in our operations under Australian modern slavery legislation, including our subsidiary organisations.

This Modern Slavery Statement is made by Acquire BPO Pty Ltd and its subsidiaries for the financial year that ended in June 2023.

This Modern Slavery Statement has been approved by the principal governing bodies Ostia Holdings Pty Ltd. and Stav Holdings Pty Ltd.

Signed by:

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**Scott Stavretis**

Chief Executive Officer – Acquire BPO Pty Ltd  
Level 15, 10 Queens Road, Melbourne, VIC 3004  
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# Appendix:

How our Statement addresses the mandatory reporting criteria

<b>Modern Slavery Act Requirements</b>	<b>Reference on the Acquire BPO Report</b>
identify the reporting entity	Our Commitment against modern slavery page 3
describe the structure, operations, and supply chains of the reporting entity	Our corporate structure, operations, and supply chain pages 3 - 7
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	Risk of modern slavery page 5 - 8
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	Preventing modern slavery in our business pages 8 – 11
describe how the reporting entity assesses the effectiveness of such actions	Our effectiveness in combating slavery page 11
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation page 4
include any other information that the reporting entity, or the entity giving the statement, considers relevant	Due diligence on modern slavery page 7 Modern slavery training page 11
provide the details of approval by the principal governing body of the reporting entity	Further steps and remediation page 12

