



# Modern Slavery Statement

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SYNERGY GROUP AUSTRALIA HOLDINGS PTY LTD  
SYNERGY GROUP AUSTRALIA PTY LTD  
SYNERGY GROUP LAW PTY LTD

**31 DECEMBER 2022**

## Reporting Entities

This Modern Slavery Statement (“Statement”) is made on behalf of Synergy Group Australia Holdings Pty Ltd (ABN 38 662 711 551), and the wholly owned subsidiaries Synergy Group Australia Pty Ltd (ABN 65 119 369 827) and Synergy Group Law Pty Ltd (ABN 27 654 575 569) (collectively “Synergy”) for the financial year closing 30 June 2022. This is Synergy’s first Modern Slavery statement, which is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth).

## Our Statement

Synergy is a professional services firm based in the Australian Capital Territory which aims predominantly to uplift, shape, and enable the public and private sectors to anticipate and respond to both domestic and international challenges. Synergy offers a full range of consultancy, project and managed services uniquely tailored and aimed at the complexities and challenges facing Government.

Synergy is proud to be different, valuing each other’s uniqueness. Synergy takes a proactive approach to seeking out challenges and embracing new perspectives.

Synergy celebrates diversity and supports change within its business areas with initiatives such as the Straight Allies network. Synergy’s values have been considered and actively promoted and underpin what differentiates us from competitors. Synergy believes in being **honest to self and all**, doing as we say, acting with integrity and remaining true to ourselves and others. Synergy people share their successes, are generous and both internally and externally support others through having **abundance mentality**. Synergy’s people are its stars - that’s why at Synergy **it’s personal**. Everyone is valued on their own terms with difference being a source of our strength. **Acting as one** through collaboration, we create impact as an integrated team. Synergy is **positively charged** by acting with confidence and resilience and believes that being optimistic leads to the best possible approach. Synergy seeks to **play with impact** by anticipating the most important challenges, positioning strategically, thinking critically, and solving in innovative ways.

### Honest To Self And All

We do as we say, act with integrity and are true to our selves and others.

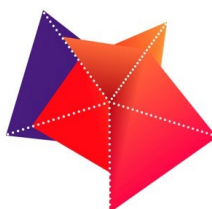


### Abundance Mentality

We share success, are generous and support each other.

### Play With Impact

We anticipate the most important challenges, position strategically, think critically and solve in innovative ways



### It's Personal

Our people are our stars; we value everyone on their own terms with these differences being our source of strength.

### Positively Charged

We are confident, resilient and ever optimistic in our approach



### Act As One

We collaborate to create impact and work together as an integrated team with each other and our clients.

These values demonstrate Synergy’s commitment to eliminating modern slavery practices and describe how activities have and will be undertaken to mitigate risks of those practices in supply chains. For twenty-one years Synergy has prided itself as being a leader in the provision of Government professional services and is committed to supporting the *Modern Slavery Act 2018 (Cth)*. Synergy strongly supports governmental mechanisms aimed at addressing violations of human rights.

This Statement outlines Synergy’s operations and supply chains, modern slavery risks, actions taken by Synergy to date, the effectiveness of those actions and the approach taken during our first reporting period. This Statement sets out the current state of operations and identifies areas of remediation and improvement.

This Statement is backed by Synergy’s steadfast commitment to consistent and continuous improvement, and a willingness to recognise the risks in our current state and to undertake the necessary actions so as to minimise and mitigate those risks.

## Organisational Structure, Operations and Supply Chain

### Organisational Structure

Synergy Group Australia Holdings Pty Ltd, Synergy Group Australia Pty Ltd and Synergy Group Law Pty Ltd are managed centrally in Canberra. Essentially, these entities operate as one entity in similar industry sectors and are pragmatically controlled by the same board, share the same management, vendors and corporate functions including procurement, finance, information technology, human resources and legal. As such, this Statement is made on behalf of these entities.



### Operations

Synergy operates across Australia with two offices located in Barton, ACT and Griffith, ACT, with staff working remotely from other locations. Synergy employed approximately 426 permanent staff and in the financial year ending 30 June 2022 met the threshold for reporting.

Synergy has nine separate business lines, alongside an enabling corporate services branch. A brief description of each business line is below:

*Advisory:* Working to identify, understand and solve the right problem, the Advisory team bring new insights and ideas to resolve, evolve and move forward toward a new solution and a better alternative. This team comprises three services: Business Analytics, Costing and IT Financial Management and Project Controls.

*Assurance:* This team includes over 50 multidisciplinary professionals who work across three services: Organisational Effectiveness and Improvement, Audit and Operational Resilience. Assurance aims to assist their clients in mitigating risks by designing frameworks, auditing what is and making it more effective.

*CFO:* This capability has two services: CFO Advisory and CFO Professional. The CFO capability aims to be a strategic partner for Government agencies' Chief Finance Officers (CFOs) and business units.

A core capability of CFO is to provide financial management services to Government agencies. The CFO capability empowers CFOs through the timely provision of information and business insights.

*Creative X People:* This team aims to remove cultural and behavioural obstacles that distract from performance, change and being effective. The team iterate, create, and bring flow to a new way of working by unlocking conversations, discovering hidden talents, and strategically facilitating a way forward.

*Defence, Strategy and Industry:* DS&I works within the Defence and National Security sector. The team is comprised of highly skilled policy experts, strategists, communicators, and capability planners. DS&I work with clients to apply expertise, analysis and ideas supporting decision-makers who deliver the right outcome to answer the needs of the current strategic environment.

*Digital and Technology:* D&T are an agile and dynamic group of experts, working hard to achieve the results that clients envision. By making sure clients are always informed on the platforms and systems they use the most, D&T extend the benefits of their current technology or bring in the new.

*Program Design and Delivery:* This service line is home to capabilities and professional career pathways for portfolio, program and project management and organisational change management. We are a leading delivery partner for government programs and projects in Defence and as well as other Federal Government agencies.

*Synergy Law:* This team works with clients by leaning into complex challenges to provide solutions and options to achieve intended outcomes in the most pragmatic, efficient, and effective way. The legal team specialises in commercial transactional law, public law, probity, and legal advisory services. The Strategic Sourcing team works closely with Synergy Law and partners with Government to ensure procurements deliver the best business outcomes for projects and programs.

*ICT Managed Services:* A new service, offering a full range of technical service support and assistance, including both hardware and software, and management of information technology systems. The ICT managed services team, leveraging the suite of internal capability, aim to work with clients to solve problems efficiently and effectively, as well as setup new leading-edge capabilities including cloud offerings.

## **Synergy's Clients**

Synergy's key clients are Australian Commonwealth Government agencies, with the Commonwealth constituting the majority of Synergy's clientele. Synergy also provides services to the Australian Capital Territory government, as well as other state and territory governments, private sector businesses and not-for-profit organisations.

## **Suppliers**

### *Location of Suppliers*

In preparing our first Modern Slavery Statement, Synergy has focused on the modern slavery risks of our Tier 1 suppliers. Synergy understands that Tier 1 suppliers are those with whom Synergy has a direct contract. Tier 2 suppliers are considered the suppliers of Synergy's key contractors and subcontractors, and Tier 3 suppliers are the subcontractors or contractors of the Tier 2 suppliers.

99% of Synergy's Tier 1 suppliers are located domestically within Australia, with the majority in the Australian Capital Territory. 1% of Synergy's Tier 1 suppliers are located internationally, with one supplier located in Colorado, United States of America, and the other in Singapore.

Synergy's investment in the local Australian Capital Territory market by sourcing suppliers locally is reflective of the business and vision of Synergy, which is committed to the investment and interests of Australia.

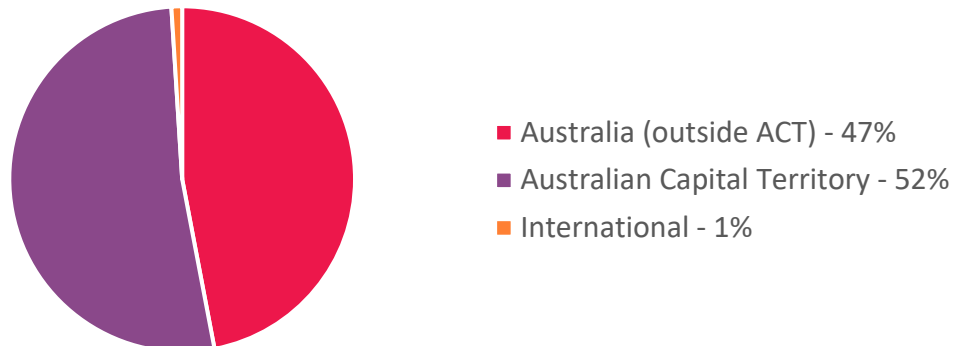


Figure 2: Location of Synergy's Tier 1 suppliers.

Synergy recognises that there are potential risks of modern slavery in its supply chains, including Tier 2 and 3 suppliers. Synergy is committed to undertaking a more in-depth risk assessment of its suppliers during the current reporting period, which will inform the future strategic direction that Synergy will embark upon in to reduce risk associated with modern slavery.

#### *Types of Suppliers*

Synergy typically utilises a variety of Tier 1 suppliers across five main supplier categories. Synergy's major suppliers in terms of their proportion of cost of the reporting period, are in the industries of Contractors, IT services, Training, Marketing and Recruitment.

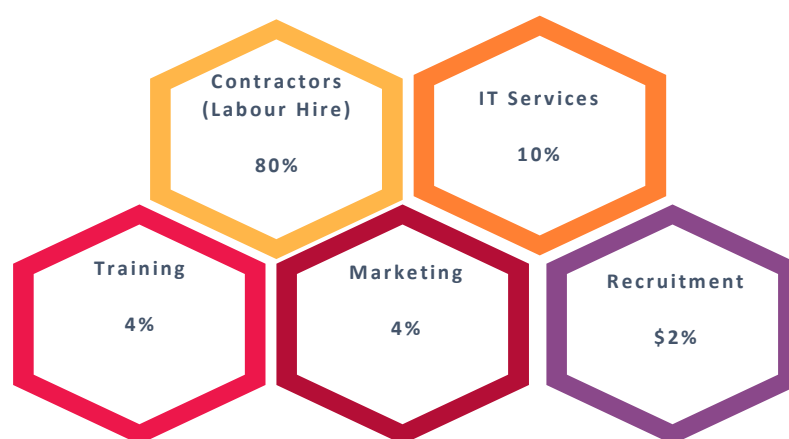


Figure 3: Synergy's approximate spend across supplier categories.

# Risks

## Background

Australia has a robust legislative framework criminalising trafficking of persons, slavery and slavery-like practices. Slavery-like practices include servitude, forced labour, and deceptive recruiting. Offences apply to public sphere exploitative labour practices and exploitation in the private sphere.

Australia's commitment to prevent slavery-like practices is reflected in legislation protecting victims of modern slavery. For example, victims of modern slavery may be protected under the vulnerable witness protection program (*Crimes Act 1914* (Cth)) and *Criminal Code Act* (1995)). Additionally, the *Migration Act 1958* (Cth) provides for offences for allowing persons to work in breach of visa conditions, as well as allowing victims who do not hold a valid visa to remain lawfully in Australia.

The *Modern Slavery Act 2018* (Cth) establishes a risk-based framework to target modern slavery practices in supply chains, further supporting Australia's commitment to prevent slavery-like practices.

Australia's laws relating to slavery offences have extraterritorial jurisdiction meaning that action may be brought against offenders whether or not they are Australian citizens, whether or not the victims are Australian citizens and whether or not the conduct occurred within or outside Australia.

## Initial Assessment of Synergy's Supply Chain

In undertaking an initial assessment of its supply chain, Synergy considered risk through the lens of geography and industry.

### *Geography*

Geography is relevant as 1% of Synergy's suppliers are located internationally. Given the aforementioned Australian laws that target modern slavery practices, in conjunction with additional legislation such as the *Fair Work Act 1999* (Cth) and *Proceeds of Crime Act 2002* (Cth), as well as similar State/Territory laws, Synergy assesses the risk of modern slavery to be **low**.

Synergy appreciates that modern slavery practices by international suppliers are particularly complex as it is more difficult to have line-of-sight to the activities carried out by those suppliers. This is confounded by different legal systems and laws, as well as differing cultural norms and expectations with respect to workplace rights and employer responsibilities.

The two overseas suppliers that were identified above are located in the United States of America and Singapore. The supplier identified within the United States of America is based in Fort Collins, Colorado and provided training services to Synergy staff. Training and Education is not deemed a high risk industry, and as such this does not present a high risk. The Singapore-based supplier is an employment-focused social media company that provides professional networking and career development, and as such does not present a high risk.

### *Industry*

Synergy understands that risks vary from industry to industry. In undertaking its assessment Synergy considered each industry as noted in Figure 4 above, taking into account the total number of suppliers per industry and Synergy's total expenditure per industry, noted in the same Figure.

In considering each of the industries, Synergy identified that its sourcing of labour hire consultancy may increase risk for potentially weaker labour standards given the lower visibility of how the workforce is managed. The supply of IT Services may present a greater risk of weaker labour standards due to the procurement that is undertaken by the suppliers of Synergy's suppliers (Tier 2 and Tier 3 suppliers). Technology and IT services may involve modern slavery risks due to systemic labour issues in the technology hardware industry, and further due to technology and IT products being acquired from countries with higher modern slavery risks. However, as Australian laws control the preponderant number of supplier activities, Tier 2 and Tier 3 suppliers are more likely to represent a low risk.

This Statement represents Synergy's initial public articulation of steps taken towards a comprehensive modern slavery risk assessment, as such Tier 2 and Tier 3 suppliers will be considered in more granular detail in upcoming future statements.

## Our Actions and Approach

### Approach and Action

Whilst instances of modern slavery practices were not identified in Synergy's operations and supply chain during this reporting period, Synergy will continue to diligently work with and assess our suppliers to ensure that instances of modern slavery practices do not arise in future supply chains. Synergy will provide education and guidance to staff and will undertake rigorous vendor qualification.

Synergy completed the development of a Modern Slavery Policy applicable to Synergy, its controlled and related entities, and its suppliers. The Modern Slavery Policy has been approved and is effective for the modern slavery reporting period (FY22-23).

Synergy has allocated an internal corporate team with responsibility for overseeing and implementing Synergy's commitment to eliminating and reducing the risk of modern slavery from its operations and supply chains. Additionally, the team is responsible for investigating, addressing and reporting on any potential modern slavery practices that may be associated with Synergy or its suppliers. The team is supported by key professionals with diverse experience across various fields, including human resources, finance, strategic sourcing, advisory, legal and assurance.

### Continual Assessment of Effectiveness and Future Commitment

#### *Synergy's Continual Assessment of Effectiveness*

Synergy has established a Modern Slavery Working Group tasked with the management of Synergy's modern slavery commitments, obligations, and overall response. The team will continue to focus on the implementation of the Modern Slavery Policy and the development of associated procedures, including the compilation of resources to assist the Synergy community in meeting the objectives of the Modern Slavery Policy.

Synergy will assess the effectiveness of actions taken to mitigate modern slavery practices, including:

- the use, effectiveness, and ability to conduct due diligence processes and how these processes may be improved;
- the frequency of discussions around modern slavery in the workplace, including incidences where advice may be sought, or consideration is required; and
- the ideal tools, training, and other resources needed to assist staff in realising Synergy's modern slavery commitments which will lead to the acquisition of the Forced Labour Risk Determination & Mitigation tool.

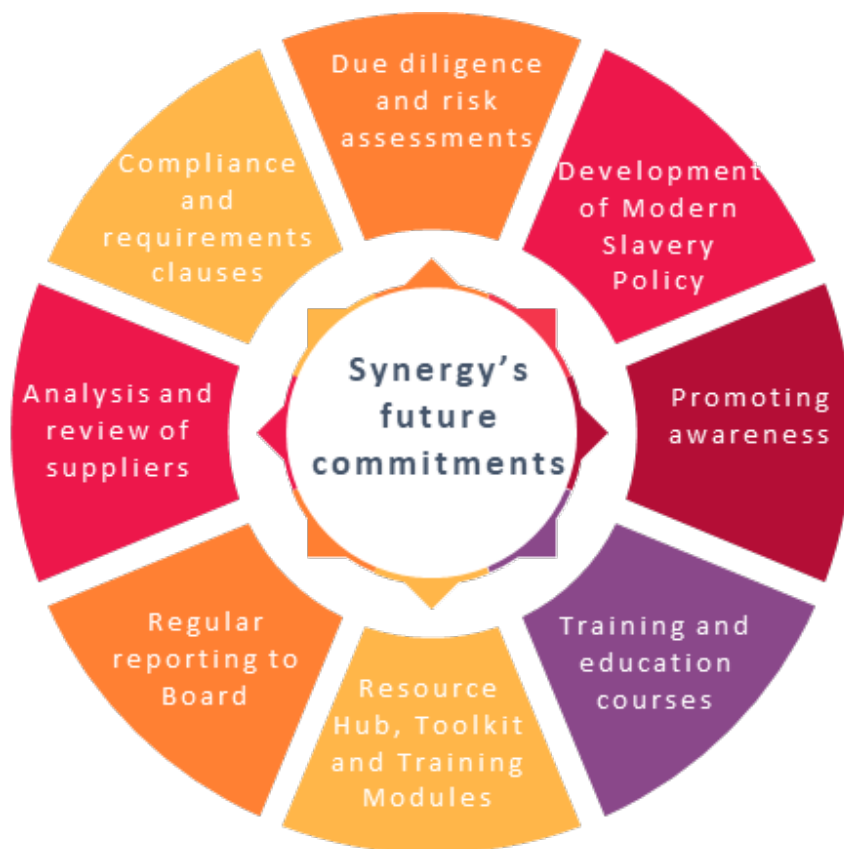


Synergy will continue to conduct risk assessments related to modern slavery practices in its operations and supply chains and record identified risks in a register, the likelihood of occurrence and the potential consequence of the realisation of those risks, and how Synergy will manage those risks.

Synergy's work in this space is ongoing, and by committing to the continual monitoring of modern slavery risks and development of treatment actions and measures, Synergy will have an intrinsic ability to assess the effectiveness actions.

#### *Synergy's Future Commitments*

While in this reporting period we have assessed our risk as 'low,' we understand that there are steps and actions we can take to improve and strengthen our awareness, accountability, and compliance. We are committed to reducing the risks of and eliminating modern slavery. Figure 5 provides a high-level overview of the steps we will commit to in the coming reporting period to demonstrate our ongoing commitment.



#### *Synergy's Future Actions*

The high-level framework provided above can be broken down into 8 Future Actions, which Synergy will commit to in order to tackle modern slavery risks. These actions will improve our approach to assessing and mitigating the risk of modern slavery, as well as strengthening our compliance and accountability mechanisms. Further, we will undertake action aimed at increasing awareness, designed to enhance the knowledge of both employees and suppliers on the challenges and risks of modern slavery. Our 8 Future Actions are set out below:



Action 1	The development and implementation of a Synergy modern slavery-specific policy and procedure, as well as ensuring where applicable, the Synergy policies and procedures address the risks of modern slavery and endeavour to mitigate those risks
Action 2	Working with suppliers, partners and stakeholders to conduct due diligence and risk assessments to ensure that the parties Synergy engages with are also committed to minimizing the risks of modern slavery
Action 3	Promoting awareness of modern slavery through the implementation of training and the provision of materials such as templates and other tools to enable staff, as well as suppliers, partners and other stakeholders, to identify and respond to risks of modern slavery
Action 4	The development of modern slavery compliance and requirement clauses for use in Synergy's contract templates and other agreements
Action 5	Ensuring Synergy is held accountable for its commitments to eliminating modern slavery through regular reporting to the Synergy board. Continue to engage and utilize the guidance materials provided and recommended by Australian Border Force and key international organizations
Action 6	Undertaking an in-depth analysis of Synergy's suppliers, including a review of the subsequent tiers of Synergy's operations and supply chains
Action 7	Synergy will be instructing partners and key employees to undertake training and education courses, which are publicly available, in order to increase their own understanding and awareness of modern slavery in our organization's operations and supply chains
Action 8	Synergy will develop its own suite of Modern Slavery Training Modules, an internal Modern Slavery Resource Hub and a Modern Slavery Toolkit. These resources will be available and promoted to all members of Synergy, in order to further our commitment to reducing the risk of modern slavery in Synergy

Figure 5: Synergy's Future Commitments

# Consultation and Approval

## Consultation process

This Statement was prepared by the Synergy Law team, with in depth consultation being undertaken with senior leadership and board members of Synergy entities prior to preparation.

## Approval

This Statement was approved by boards of Synergy Group Australia Holdings Pty Ltd, Synergy Group Australia Pty Ltd and Synergy Group Law Pty Ltd on 20 February 2023.

EXECUTED by Synergy Group Australia Holdings Pty Ltd, Synergy Group Australia Pty Ltd and Synergy Group Law Pty Ltd:



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Signature

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Rob Kennedy

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Director

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20 February 2023

Date



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Signature

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Mark Patrick

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Director

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20 February 2023

Date