



# Modern Slavery Statement

RC-ML-001

Reporting Period of 2022 - 2023



# Disclosure Notice

This statement includes CXC A/NZ operating in Australia, New Zealand and Philippines.

CXC A/NZ entities includes Global Contractor Management Solutions Pty Ltd (GCMS – trading as CXC) and its sub-entities CXC Global NZ Limited, CXC Corporate Services Pty Ltd, Contractor Workforce Solutions Pty Ltd, CXC Talent Pty Ltd and SaaSpeople Pty Ltd.

While included in our global modern slavery strategy, this statement does not include CXC Global or its other entities such as CXC Asia, CXC Europe, CXC Latin America or CXC North America. CXC's partner offices not considered to be a contributing entity have also not been considered as part of this statement.

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# ABOUT US

## About CXC

We have been operating in the contingent workforce management industry since 1992. Today, CXC continues to lead the way by enabling both corporations and individual consultants to adapt to today's high-performance work environment.

## Global Footprint

We operate in more than 100 countries from more than 30 local offices spread right across the globe. Our approach is to provide local knowledge and expertise, coupled with an unparalleled global reach and scalability.

## A GLOBAL ORGANISATION

Our geographic footprint spans 100+ countries providing services from over 30 offices.

# Global reach. Local expertise



## PURPOSE

The world of work works differently today. We can now work anytime, anywhere. And hire anyone from anyplace. While new technologies promise higher productivity, managing new ways of working becomes highly complex.

These constant changes pose some interesting challenges. Can profits be enhanced without compromising values? Can the aspirations of workers be balanced with the demands of business? Can a business do the right thing, while also doing right?

At CXC, we believe in making work, work for everyone. We maximize workforce flexibility, while minimizing regulatory risk. We mobilise talent from around the world, not just around the corner. And we help businesses gain an edge, without cutting corners.

At CXC, we help business work the right way. Work flexible. Work Secure. Work Fair. Work Smart. Work Right.

## CORE VALUES

CXC is a workplace like few others. The retention of our team vastly outshines our talent and industry competitors. With shared values that are lived by all, our team is empowered to deliver a high-grade service that our clients have come to expect from the CXC brand.

|   |  |
|---|--|
| <p><b>We are passionate</b></p> <p>We are proud about what we do. We strive for professional excellence because we believe in ourselves and our team.</p> | <p><b>We are curious</b></p> <p>We are solutions focused. We use our curiosity and love for learning to solve our customers' problems.</p> |
| <p><b>We are honest</b></p> <p>We keep our promises and act with integrity. We do the right thing.</p>  | <p><b>We are accountable</b></p> <p>We take responsibility for our work. By taking ownership, we deliver results.</p>                      |
| <p><b>We are adaptable</b></p> <p>We don't back down from change. By embracing it, we have the opportunity to learn and grow.</p>                         | <p><b>We are family</b></p> <p>We care for each other and work better as a team. Our culture is built on respect, loyalty and fun.</p>     |

# COMPANY STRUCTURE

## CXC A/NZ

Global Contractor Management Solutions Pty Ltd - (Trading as CXC)

ABN: 96 158 179 054

**CXC Corporate Services Pty Ltd**  
ABN: 58 150 274 007

**Contractor Workforce Solutions Pty Ltd**  
ABN: 85 145 542 114

**CXC Global NZ Limited**  
NZBN: 94 290 316 803 01

**CXC Talent Pty Ltd**  
ABN: 73 150 274 954

**SaaSpeople Pty Ltd**  
ABN: 52 620 188 276

CXC A/NZ is part of the CXC Global Group and is comprised of Global Contractor Management Solutions Pty Ltd (GCMS), trading as CXC, and its sub-entities CXC Global NZ Limited, CXC Corporate Services Pty Ltd, Contractor Workforce Solutions Pty Ltd, CXC Talent Pty Ltd and SaaSpeople Pty Ltd operating in Australia, New Zealand, and Philippines. CXC A/NZ had on average 90 permanent staff and upwards of 3500 in our contingent workforce at any given time, with an approximate 10000 contingent workers during the reporting period.

## PRINCIPLE GOVERNING BODY



# BUSINESS OPERATIONS & SUPPLY CHAINS

## OPERATIONS

Established in Australia in 1992 to provide contractor vetting, compliance and payroll, the contingent workforce market has continued to be our core, with services now delivered in over 50 countries internationally by local specialists. Our corporate offering has evolved over the past decade due to increasing market complexity, regulation, technology, and evolving client demand.

CXC pioneered and leads the way in whole of workforce contingent workforce management solutions where all workers are managed under one governed program irrespective of sourcing channel – direct or recruitment supplier. Our capability is based in contingent worker risk & compliance management and a targeted offering aimed at attracting and retaining highly sought-after career contractors.

CXC is an extension of our clients’ HR and Procurement function, taking responsibility for their entire contingent workforce. CXC’s difference is that, while managing visibility, cost, and control, we also enable their talent first approach – including access to new and known talent and improving the engagement and performance of the workforce.

Clients with strong internal capability benefit from a workforce management partner who understands the full contingent workforce acquisition and management life cycle. Clients can choose to outsource their full contingent program or components of the program where particular external support and expertise is needed – for example, in complex workforce risk & compliance management.

CXC offers a full suite of contractor management outsourcing services. At the core of CXC’s solution is contingent workforce management – an essential service for companies to maximise risk mitigation, quality, efficiency, and cost savings across their contingent workforce. We invest heavily in people, processes, and technology to ensure contingent workers are engaged, onboarded, payrolled and disengaged in full compliance with regulatory, WHS and company policy requirements.



## PROGRAM MANAGEMENT

The focus of CXC's program management services is to introduce additional contingent worker initiatives, beyond workforce management, which enables our clients to better meet their strategic business objectives.

Initiatives include direct access to talent, maximising the effectiveness of your recruitment supplier channels and harnessing technology, process and people to create competitive advantage.

The key elements of CXC's contingent workforce management solution are shown below.



This model ensures focus across recruitment and workforce management by specialists, a streamlined approach to compliance management, a uniform contractor experience and benefits across all workers, award interpretation and consistent application of all on-costs.

CXC's service is founded on a rigorous risk and compliance management framework and application of both industry best practice and established benchmarks to help our clients achieve greater process, quality, compliance, and cost efficiencies.



# SUPPLY CHAIN MANAGEMENT

## STAFFING SUPPLIER MANAGEMENT

CXC has developed agency relationships over 30 years, with our initial offering managing and payrolling the independent contractors of recruitment suppliers. Our service offering to corporate customers harnesses our long-standing relationships with suppliers, market insights and expertise in payment processing.

Our supply chain management programs include:

- Streamlined single cycle client invoice and outsourced payment processing to the recruitment supply chain
- Systems and processes to distribute requisitions and performance management of selected suppliers
- A CXC preferred supplier panel of pre-vetted, negotiated and proven niche recruitment providers.

## CONTINGENT TALENT SOURCING CHANNELS



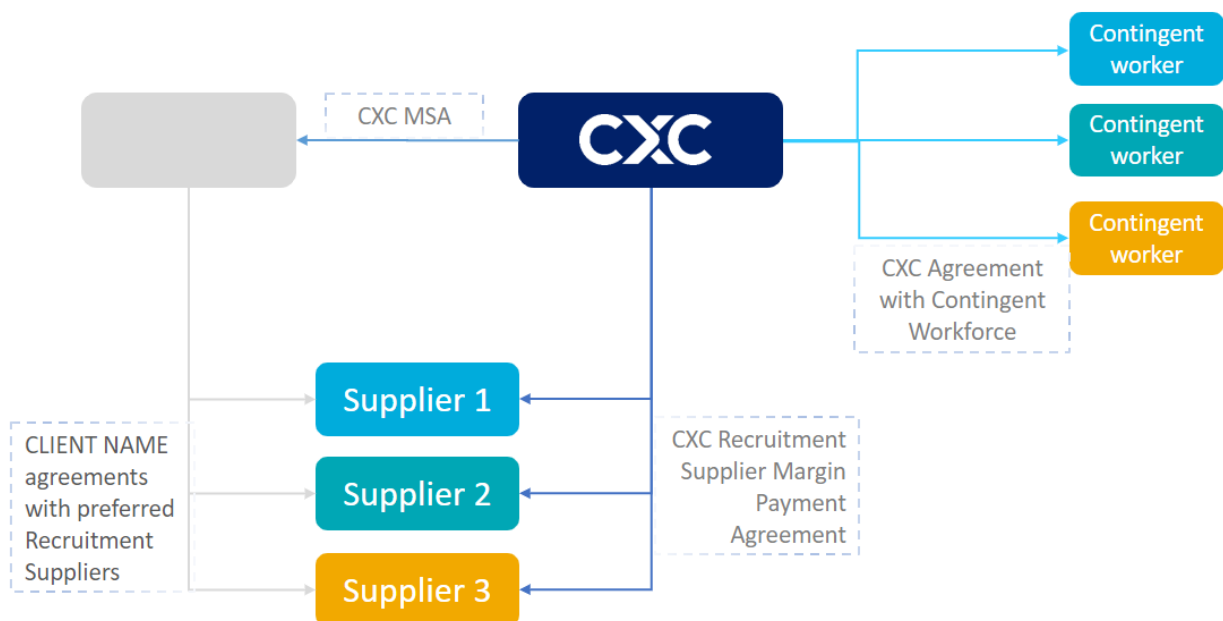
## SUPPLY CHAIN

CXC can also assist sourcing by introducing our supply chain service.

Recruitment Supply Chain | Supplier Payment Model:

- Client holds 'sourcing-only' agreements with recruitment agencies (includes KPIs/SLAs)
- The recruitment supplier is paid a sourcing-only margin as negotiated by Client
- CXC is responsible for payroll and all associated services (PI/PL, payroll, workers' compensation)

CXC can assist clients to determine a fair sourcing margin benchmarked against market rates



## MAPPING COMPANY SUPPLY CHAINS

CXC like most companies knows their immediate or first-tier suppliers; however, risks of modern slavery are often further down a supply chain since there is less visibility over working practices. This is even more so when operating through business partners.

To effectively conduct due diligence and understand where modern slavery risks reside, CXC aimed to progressively improve our understanding and oversight of all tiers of our supply chains and business partners’.

As a first step, CXC undertakes an assessment of supply chain models and governance structures. Based on this assessment CXC is able to identify areas where they have higher leverage and where the capacity to influence practices is limited.

Where CXC sits at the top of a supply chain, perhaps several tiers removed, it will be harder to map all suppliers immediately. To address this, CXC, where practical, worked systematically and progressively to build a complete picture of our supply chain., or business partners’ supply chain.

**Note** that supply chain mapping can be a resource and time-intensive process and may not be possible to complete in its entirety once we get down to 3<sup>rd</sup> tier suppliers.



# FRAMEWORK

## MODERN SLAVERY FRAMEWORK

Our approach to the incorporation of modern slavery into our ESG is based on the following 6 key elements.

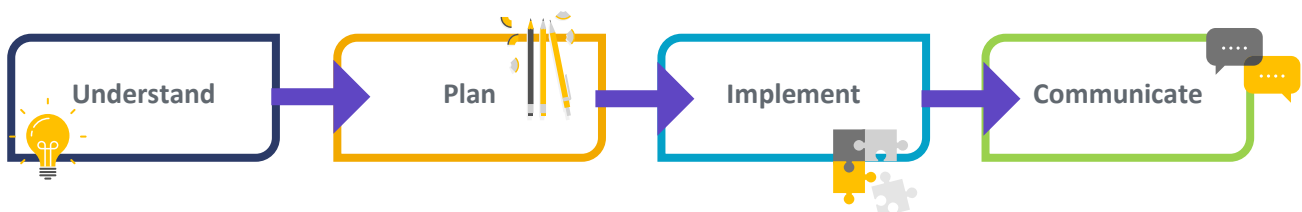


## POLICY FRAMEWORK

To assist with meeting our due diligence CXC underwent a comprehensive review and development of policies, procedures, and contract agreements to articulate our commitment, expectations, and provide clear and detailed processes to provide all stakeholders with the tools and knowledge to prevent, raise a grievance or complaint of human rights violations.

| MANAGEMENT SYSTEM DEVELOPMENT          | PURPOSE   |
|--|---|
| <b>Code of Conduct</b>                 | This policy outlines the conduct that is expected and the conduct that is deemed unacceptable at CXC. Suspected breaches of this policy will be taken seriously in any circumstance and will prompt an investigation which may result in disciplinary and/or corrective action.     |
| <b>Supplier Code of Conduct</b>        | The Supplier Code of Conduct is to outline our values and document the expectations we have of our suppliers and business partners in the areas of human rights and workplace conditions, in addition to our existing expectations in respect of ethical sourcing and conduct.      |
| <b>Corporate Social Responsibility</b> | CXC is not only about business and economic factors, we are a part of the wider business and social community and as such have a moral responsibility that surrounds the social and environmental impacts of our operations.  |
| <b>Ethical Sourcing</b>                | The CXC Ethical Sourcing Policy is built on the principles of the ETI and ILO Conventions, to ensure there is a commitment that goods and services are sourced in a responsible manner.   |
| <b>Human Rights</b>                    | This policy is used to underpin the commitment of CXC and inform any statement on modern slavery that CXC is required to produce as a result of legislative requirements in any country in which CXC operates.  |
| <b>Grievance and Disciplinary</b>      | To ensure that all CXC stakeholders are aware of their responsibilities and rights with respect to grievances, disputes and disciplinary actions.   |
| <b>Anti-Bribery</b>                    | The purpose of this policy is to set out the responsibilities in observing and upholding the Company's position on bribery and corruption and to provide information and guidance to those working for the Company on how to recognise and deal with bribery and corruption issues. |
| <b>Conflict of interest</b>            | CXC is committed to maintaining confidence in the probity of decisions and associated procurement activities undertaken, by   |

|                                     |  |
|-------------------------------------|--|
|                                     | ensuring that Conflicts of Interest are identified, documented, and managed so that they do not affect our services, activities or decisions.  |
| <b>Disclosable Conduct</b>          | This procedure was developed to demonstrate the importance on ensuring a healthy, safe, and supportive environment and to create a culture where our people feel confident to raise breaches of internal rules or human rights.  |
| <b>EEO and Diversity</b>            | CXC are committed to ensuring our workplaces are free from discrimination and provides equal opportunities for all employees.  |
| <b>Supplier Questionnaire</b>       | The supplier questionnaire was developed to identify concerns or gaps in our supply chain.   |
| <b>Supplier Agreements</b>          | The Supplier agreements were reviewed and updated to ensure our commitment and expectations were clearly stated in tandem with the Supplier Code of Conduct.   |
| <b>Supplier Criticality Matrix</b>  | The supplier criticality matrix determined the risk a supplier poses and how critical the supplier is to our supply chain and operations.  |
| <b>Authorised Supplier Register</b> | All approved suppliers are entered on the Authorised Supplier Register, any supplier not on the register is not to be used until mitigation and remediation processes have been enacted and the supplier is actively participating.                                    |
| <b>Training</b>                     | The training material developed is to provide task specific and awareness training in regard to our legal and company requirements, obligations and their rights. The training is provided to staff via the LMS and via the MyCXC Portal for our contingent workforce. |



# MODERN SLAVERY RISKS

For over 30 years we have been safely and sustainably managing and payrolling the contingent workforce of our clients and recruitment suppliers. We are committed to comply with all labour, employment, immigration and whistleblower laws across the territories we operate in.

We are committed to:

- Providing a healthy and safe working environment for all our employees
- Providing a workplace free from harassment, discrimination and bullying
- Acting ethically and lawfully in all our business operations
- Engaging with our stakeholders respectfully and honestly
- Building sustainable business opportunities

We have an internal compliance audit program to assure the effectiveness of our risk control framework and compliance with our policies. We consider the potential for us to cause or contribute to incidents of modern slavery to be low, areas of vulnerability in our operations may exist in our overseas operations and will be continuously monitored.

While the risk of modern slavery in Australia is lower than many other jurisdictions, we recognise that our Australian suppliers provide us with goods and services that can cross multiple risk categories and therefore will require continuous engagement and assessment.

We seek to engage suppliers with proven values, ethics and business practices, including those related to modern slavery and broader human rights issues. This includes setting clear standards for supplier behaviour through our Supplier Code of Conduct. We also work with suppliers to positively influence their response to modern slavery risks.

Our focus in 2023 has been on managing lower risk suppliers also present modern slavery risks and vulnerabilities. Thus CXC has undertaken a broader review and risk prioritisation of our lower risk suppliers.

We are also undertaking further work to understand the vulnerabilities and potential modern slavery risks in the non-Australian territories where we CXC A/NZ operates, such as the Philippines and New Zealand.

While we don't have any direct high-risk suppliers in those territories, we are aware that there may be an increased vulnerability to modern slavery. We continuously work with our overseas teams and clients to better understand the complete supply chain and review supplier modern slavery risks relating to our operation.

CXC is committed to continue our modern slavery risk management, supplier assessments and engagement, mitigation, mediation and review program.

We recognise modern slavery risk management as a challenging and evolving process and strive for continuous improvement.

# GOVERNANCE

CXC’s continuous focus was to strengthen our understanding of potential modern slavery risks within our business, and the development of a robust management system designed to limit the risk of modern slavery occurring within our business, supply chains or business relationships.

With the support of the working group, we undertook several key activities identified in our roadmap in last years’ submission as part of our continuous improvement which have formed the basis of our modern slavery framework since 2019.

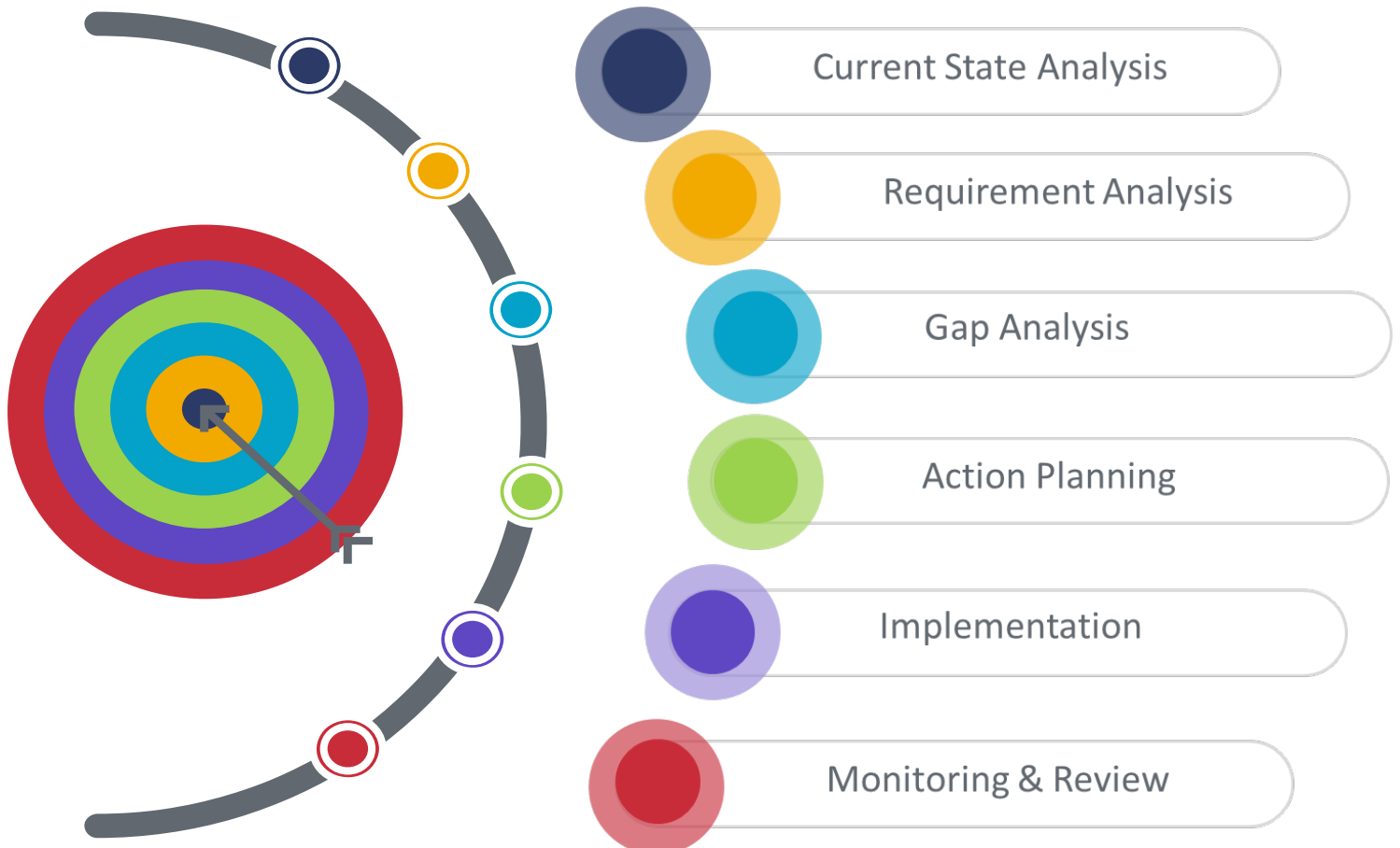
## WORKING GROUP

To ensure that the management of modern slavery risks across our business would effectively be identified and addressed a working group was established from representatives from, Supply Chain, Risk & Compliance, Human Resources, Sales & Marketing, Finance, Operations and Client Services across the A/NZ region.

## GAP ANALYSIS

The working group conducted a gap analysis to identify areas for improvement across the following categories: business management systems, human resources, supply chain management, risk & compliance, and clients.

The gap analysis provided an understanding of our current processes and management in relation to modern slavery and identified various corrective actions and improvements for better managing our response to modern slavery risks and potential breaches of human rights.



## MODERN SLAVERY ASSESSMENT

In 2019 CXC created a Human Rights project team, consisting of Risk & Compliance Team (Legal, Compliance, Risk, WHS and HR) and our Supply Chain Manager to identify and mitigate risks within our operations and supply chain. The Team worked together to identify potential risks of modern slavery amongst our operations and supply chain and developed a Human Right Management System which includes a set of policies, guides and questions for internal use and suppliers.

During the 2021-2022 Financial Year, the same project team also participated in a review of the modern slavery management system and consider a global alignment strategy. This also included more in-depth discussions about what to do if modern slavery was uncovered in our supply chain in countries where human rights and modern slavery are at higher risk and with legislation lacking.

In 2022-2023 CXC has expanded upon our previous works to further integrate our global modern slavery strategy, specifically across our Asia business.

Beyond using CXC's internal assessment, more explained in 'Contextual Factors', and regular compliance audits helped us identify potential concerns and gaps in our operations.

The supplier questions enquire about a wide range of issues – from the diversity of the work force, work force management processes, use of migrant labour and labour hire agencies to the age of workers and retention of identity documents. They were developed because it was discovered that, while reviewing suppliers' policies is helpful, in some cases these may not tell the full story. In other cases, policies may not exist.

To improve our understanding of the different modern slavery risks CXC may face in different locations as well as exposure to related issues such as broader human rights risks and corruption, we use various tools and global indexes such as the Global Slavery Index as well as more in-depth information on identified risks, country, industry and company specific resources such as local trafficking reports and country narratives, industry benchmarking and the Modern Slavery Registry are also useful.

For example, CXC A/NZ use the Modern Slavery Registry to view suppliers', clients and other business partners' modern slavery statements where available.

Using tools such as the Global Slavery Index CXC recognises the heightened risks of exposure to modern slavery in some emerging economies as well as that modern slavery may occur in developed markets. CXC determined that our modern slavery risks are affected by various factors, including the robustness of policies, legislation, and regulators to protect against modern slavery where CXC operate.

CXC also recognise that increased due diligence may be needed when suppliers bring employees or contractors into the country. In early 2022, the CXC global group adopted and introduced the requirement into our Master Service Agreement and Supplier Code of Conduct for suppliers to provide us with their modern slavery and potentially other policies to review in certain circumstances before the contract can proceed. This includes suppliers and business partners in high or very high-risk countries, as defined in the Global Slavery Index.



Consideration of these policies includes looking for commitments around preventing and addressing modern slavery and may lead to further questions of the supplier on their practices. Review of these responses is done alongside the supplier questionnaire under the MSA and Supplier Code of Conduct. In the 2021-2022 financial year, CXC did not have any modern slavery-related “medium”, “high” or “Extreme” risk ratings.

If a human rights incident occurs despite our best efforts to prevent it, CXC seek to mitigate the situation as appropriate in line with our core values, policies and appropriate legislation. CXC recognise their responsibility to provide for or cooperate in remediation in situations where they identify they have caused or contributed to human rights harm, including modern slavery, in line with the UN Guiding Principles.

## CONTEXTUAL FACTORS

| CONTEXTUAL FACTOR                           | EXAMPLES  |
|---|---|
| <b>High Risk of Modern Slavery</b>          | <ul style="list-style-type: none"> <li>Country and/or sector has high modern slavery risk.</li> <li>Work is in or next to a fragile and conflict-affected region.</li> <li>There are gaps in law and enforcement on modern slavery.</li> <li>High levels of corruption in a country.</li> <li>Specific groups lack basic protection under law and face discrimination and persecution.</li> </ul> |
| <b>Type of Workers</b>                      | <ul style="list-style-type: none"> <li>Internal/foreign migrant workers.</li> <li>Refugees (a particularly vulnerable group).</li> <li>Low skilled workers (e.g. in construction, agriculture).</li> <li>High numbers of informal workers.</li> <li>Women (higher likelihood of threat and coercion).</li> <li>Temporary/agency/contract/seasonal workers.</li> </ul>                             |
| <b>Characteristics of the Third Parties</b> | <ul style="list-style-type: none"> <li>Allegations of poor practices against a business partner.</li> <li>Inadequate/poor management systems.</li> <li>Lack of transparency.</li> <li>Complex subcontracting/supply chains.</li> <li>Abnormally low tender/contract cost with third party.</li> </ul>   |

**Note** that identifying contextual factors does not necessarily mean that there are workers in conditions of modern slavery. Instead, it suggests where further due diligence should be carried out. Where elevated risks are identified, specialist (third-party) help can also be sought.

## MODERN SLAVERY INDICATORS

Examples of relevant modern slavery indicators that are looked at during our assessments of modern slavery risks in our operations, supply chain and business partner operations.

| RECRUITMENT  |   |
|--|---|
| <p><b>Are workers expected to pay any fees to secure work?</b></p>                             | <p>Where workers have been charged a fee to secure work, it is possible that they will have to take out loans, which could lead to situations of debt bondage.</p> <p>If the fee that the worker has been charged relates to any of those below, then this should not be permitted.</p> <ul style="list-style-type: none"> <li>• Recruitment linked to debt.</li> <li>• Forced to work for indeterminate period to repay outstanding debt or wage advance.</li> <li>• Induced or inflated indebtedness (e.g. through excessive interest rate on loans).</li> </ul>  |
| <p><b>What information is provided to workers before they apply for and begin the job?</b></p> | <p>Where there are signs that workers have been deceived about the nature of their job during the hiring and recruitment process, there are heightened risks of modern slavery, especially where workers incur debt to secure the job. Deception could include false promises about the nature of the work (including terms and conditions of employment, accommodation, transport) and changes made in the contract between recruitment and starting the job with terms less favourable to the worker.</p> <ul style="list-style-type: none"> <li>• Deception about the nature of the work.</li> <li>• Deceptive recruitment (e.g. on working conditions, content or legality of employment contract, wages).</li> <li>• Deceptive recruitment through promise of marriage.</li> </ul> |
| FREE MOVEMENT  |   |
| <p><b>Are workers able to move freely?</b></p>   | <p>If a worker's visa or other form of documentation ties them to their employer, then this could be a strong disincentive to leaving an abusive job. This issue is exacerbated if the worker is in a country that places restrictions on the mobility of migrant workers and could lead to threats of denunciation to authorities on the basis that the worker does not possess proper documentation. Similar concerns arise with the retention of documents such as educational certificates or workbooks.</p> <ul style="list-style-type: none"> <li>• Confiscation of identity papers or travel documents.</li> <li>• Exclusion from future employment.</li> <li>• Denunciation to authorities.</li> </ul>  |
| <p><b>Under what conditions can a worker decide to leave their current job?</b></p>            | <p>Where workers cannot leave work freely and voluntarily as a result of threat of penalty, including financial, there is a heightened risk of modern slavery. Employers requiring a financial deposit from a worker as a condition of taking leave also signals an elevated risk of modern slavery.</p>  |

|   |  |
|---|--|
|   | <ul style="list-style-type: none"> <li>• Reduced freedom to terminate labour contract after training or other benefit paid by employer.</li> <li>• No freedom to resign in accordance with legal requirements.</li> <li>• Physical violence.</li> <li>• Other forms of punishment (e.g. deprivation of food).</li> <li>• Withholding of wages/assets (cash or other).</li> <li>• Threats against family members (violence or loss of land or jobs).</li> </ul>   |
| <p><b>Are workers free to come and go from the worksite as they wish? What about accommodation?</b></p> | <p>Restrictions on freedom of movement may be necessary on security grounds or for worker (and host communities) health and safety. Workers should not be physically confined to the workplace or their accommodation unnecessarily.</p> <ul style="list-style-type: none"> <li>• Limited freedom of movement and communication.</li> <li>• Locked in work or living quarters.</li> <li>• Under constant surveillance.</li> </ul>  |
| <p><b>Working conditions How much are workers paid? How regular is this?</b></p>                        | <p>Where workers don't receive adequate wages risks of modern slavery can be heightened. While national minimum wages are a convenient starting point, an understanding of adequacy is ultimately challenging. If efforts to supplement inadequate wages involve working more hours, working additional jobs for the same employer, or resorting to employer-subsidised accommodation, this increased dependency on an employer can contribute to added risks. Also, if workers are not paid at regular intervals, at least every month, in cash or via bank transfers, and where they are not given itemised payslips, risks are also higher.</p> <ul style="list-style-type: none"> <li>• Forced to stay longer than agreed while waiting for wages due.</li> <li>• Forced to work for indeterminate period to repay outstanding debt or wage advance.</li> <li>• Multiple dependency on employer.</li> <li>• Forced to work for employer's private home or family.</li> <li>• Forced engagement in illicit activities.</li> <li>• What are overtime hours?</li> </ul> |
| <p><b>What working hours, such as overtime, are workers exposed to?</b></p>                             | <p>Forcing workers to carry out overtime in excess of that permitted by national law signals a higher risk of modern slavery. If this is not a 'one off' and is carried out routinely, then risks are heightened.</p> <ul style="list-style-type: none"> <li>• Forced overtime (beyond legal limits).</li> <li>• Forced to work on call (day and night).</li> </ul>  |
| <b>THIRD-PARTY WORKFORCE</b>  |  |
| <p><b>Does the company undertake any background checks on the bidding contractors/ suppliers?</b></p>   | <p>If the tendering process does not check that a third party is licensed by the appropriate authorities in that country, or that it is operating in compliance with local laws, then third-party workers are likely to be more vulnerable to exploitative practices.</p> <ul style="list-style-type: none"> <li>• Broad risk across multiple modern slavery indicators.</li> </ul>  |

|  |  |
|--|--|
| <p><b>How does the company assess whether the bid price provides an adequate reflection of labour costs?</b></p> | <p>Business partners may use third parties such as contractors or labour agents to provide workers, but do not pay or pay comparatively little to the company for these workers. Where this is the case, it is likely that lower-skilled workers will be charged fees by the intermediaries to secure work. Compare how much workers' pay to secure a job with how much recruiters are paid by the employer for their services, and it can become apparent if the recruiter's fees are so low that abusive methods in hiring and recruiting workers are more likely.</p> |
|  | <ul style="list-style-type: none"> <li>• Induced or inflated indebtedness (e.g. through excessive interest rate on loans).</li> </ul>  |

## RISK MANAGEMENT

CXC continues to assess the effectiveness and impact of the activities described in this statement and our broader modern slavery framework. We are tracking the effectiveness through a combination of internal and external indicators, and we use these indicators to assess the effectiveness of each activity undertaken.

| PROCESS                                       | ACTIVITY   | INDICATOR  |
|---|--|--|
| <p><b>System Development &amp; Review</b></p> | <ul style="list-style-type: none"> <li>• Monitor and review of policies and procedures</li> <li>• Consulting of content and processes</li> <li>• Review of effectiveness of development system</li> </ul>                    | <ul style="list-style-type: none"> <li>• Approved documents</li> <li>• Documents implemented</li> <li>• Effective consultation reflected via the effectiveness of the system</li> <li>• End of year audit</li> <li>• Incident reports</li> </ul> |
| <p><b>Governance</b></p>                      | <ul style="list-style-type: none"> <li>• Supplier Questionnaires</li> <li>• Authorised supplier register</li> <li>• Supplier Agreements in place</li> </ul>  | <ul style="list-style-type: none"> <li>• Completed supplier questionnaires</li> <li>• Gaps identified</li> <li>• Register in place and populated</li> <li>• Updated agreements in place</li> </ul>   |
| <p><b>Risk Management</b></p>                 | <ul style="list-style-type: none"> <li>• Conducting risk assessments</li> <li>• Assigning supplier ranking</li> <li>• Implementing the Supplier Criticality Matrix</li> <li>• Developing risk profiles</li> </ul>            | <ul style="list-style-type: none"> <li>• Corrective action plans derived from risk assessments</li> <li>• Tier ranking in place for suppliers</li> <li>• Criticality score applied to suppliers</li> <li>• Risk Profile Plan</li> </ul>          |
| <p><b>Training</b></p>                        | <ul style="list-style-type: none"> <li>• Conducting risk assessments</li> <li>• Assigning supplier ranking</li> <li>• Reviewing the Supplier Criticality Matrix</li> <li>• Developing and actioning risk profiles</li> </ul> | <ul style="list-style-type: none"> <li>• Knowledge assessments</li> <li>• Workforce feedback</li> <li>• Supplier/Client feedback</li> <li>• Incident reports</li> </ul>  |

# CONSULTATION

The entities CXC Corporate Services Pty Ltd, Contractor Workforce Solutions Pty Ltd and CXC Talent Pty Ltd share the same employee and executive structure as CXC A/NZ. While SaaSpeople Pty Ltd has its own employee and executive structure.

All contingent workers are outsourced to clients. Annual consultation occurs with clients and suppliers to ensure a cooperative system is in place to mitigate the risk of modern slavery occurrences.

All CXC entities were involved via their representatives as part of the working group. The established workgroup will continue to be at the forefront of advocating human rights within our business.

## 2022-2023 ROADMAP IN REVIEW

In the FY22-23 CXC implemented or participated in various approaches and actions to assess and mitigate any risk of modern slavery occurring in its operations.



# FUTURE ROADMAP

CXC is committed to continued identified, mitigation and remediation of human rights risks within our business and associated supply chains.

Our Modern Slavery Statement as well as the continuous improvement of our human rights management system are a key part of our commitment towards our stakeholders and our due diligence towards human rights.

The upcoming years will involve the continuation and consideration to:

| THE UPCOMING YEARS WILL INVOLVE THE CONTINUATION AND CONSIDERATION TO                           |  |  |
|---|--|--|
| Monitor ongoing human rights impacts on our supply chain.                                       | Increase awareness of human rights amongst our stakeholders.   | When identified, approach high risk suppliers to collaborate and design plans to mitigate risks to human rights. |
| Continue to assess the efficacy and practicality of actions taken.                              | Continue to partner with the CXC global group to align our global strategy and reduce modern slavery risks | Design & deliver assistance programs for affected groups.  |
| Continue to communicate with our stakeholders on initiatives to mitigate risks to human rights. | Continuing to improve our due diligence processes.   | Conduct an annual internal gap analysis on current systems and design corrective actions.                        |

## THIS STATEMENT WAS APPROVED BY



**INGRID WEBBER**


CEO A/NZ, COO GLOBAL

DECEMBER 2023

The Principle Governing Body of CXC has reviewed and approved this statement – December 2023.

## CONTACT US




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