

## Davidson Group (Aust) Pty Ltd and Subsidiaries

# Joint Modern Slavery Statement

For the reporting period of 1 July 2021 – 30 June 2022

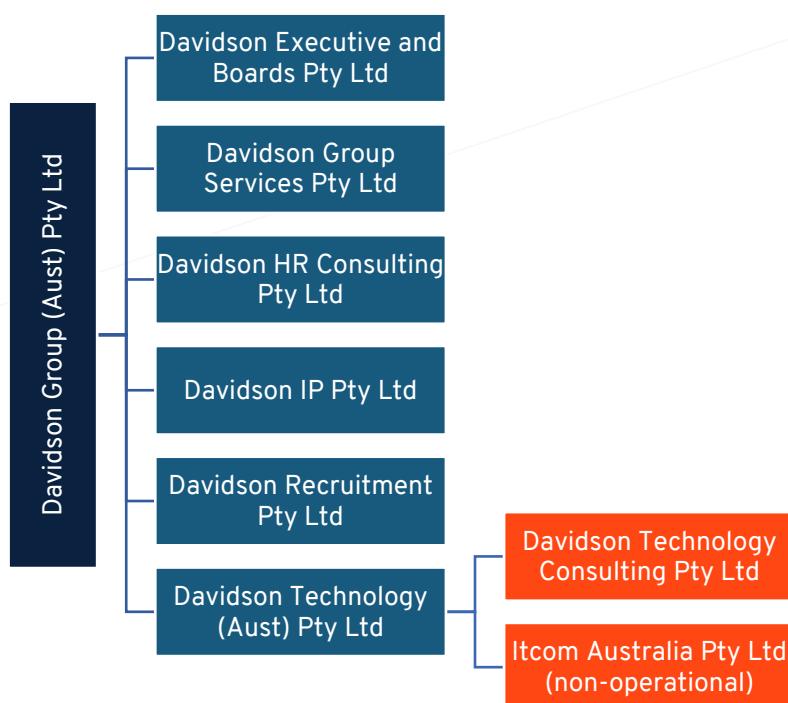
## Introduction

Davidson Group is committed to eradicating acts of modern day and human slavery from within its business, subsidiaries and supply chains. Being above the annual turnover threshold, Davidson Group acknowledges responsibility under the *Modern Slavery Act 2018* (Cth) and will ensure transparency within the group's organisation and with our suppliers of goods and services.

This statement is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) on behalf of Davidson Group (Aust) Pty Ltd (ABN 43 167 652 155) and its subsidiaries, including;

- Davidson Technology (Aust) Pty Ltd (ABN 51 167 752 258),
- Davidson Executive and Boards Pty Ltd (ABN 89 167 748 816),
- Davidson Group Services Pty Ltd (ABN 85 124 816 708)
- Davidson Recruitment Pty Ltd (ABN 50 167 132 523),
- Davidson HR Consulting Pty Ltd (ABN 38 161 578 310), and
- Davidson Technology Consulting Pty Ltd (ABN 23 163 298 379)  
(together, **Davidson, the Group, Davidson Group, we, our or us**).

At the close of the reporting period, the Davidson Group has the following corporate structure, where each body corporate owns all or the majority of the body corporate to its right.



## Structure & consultation

Davidson Group is a privately owned business with offices operating in Brisbane, Sydney, Melbourne and Adelaide. The Davidson Group has approximately 160 internal employees and specialises in providing customised temporary and permanent recruitment along with technology consulting and HR and business advisory services to enhance organisational performance.

The effective control and management of Davidson Group (including all reporting entities and subsidiaries above) is held by the Davidson Group (Aust) Pty Ltd Board. Davidson Group operates with shared board members and corporate functions such as Risk, Legal, Human Resources and Finance. All subsidiaries within the Davidson Group are subject to Davidson Group policies, procedures and standards.

As part of the preparation and development of this joint statement, the Davidson Group (Aust) Pty Ltd Board engaged with personnel from each subsidiary reporting entity to inform and provide contribution to this statement.

## Operations, supply chains & risks

As a recruitment and labour hire company Davidson Group provide on-hire candidates and employees with equitable, fair and legally compliant conditions of work. Currently most candidates and employees are sourced from Australia and engaged under Australian law, a jurisdiction with developed labour laws and worker rights. We have assessed our direct operations to be low risk in relation to modern slavery.

Davidson Group engages a relatively small number of suppliers, most of whom are based in Australia. Davidson Group's supply chain includes service providers who provide support in the areas of office maintenance and cleaning, security, IT infrastructure, office supplies, consumables and other support services including staffing, legal and employee benefit providers.

## Actions to address risks

Davidson Group has a suite of policies to ensure staff, including contractors and labour hire, all of whom are primarily based in Australia, are afforded a workplace, and working conditions that are in accordance with Australian law and are safe and free from discrimination. Wages, hours of work and other conditions are regularly audited to ensure compliance. Ongoing communications with employees, contractors and suppliers are in place to address practices in operations and supply chains that may lead to modern slavery. In circumstances where Davidson or its 'host employer' clients are unable to directly supervise our contractors, we have systems of check-ins and remote work risk assessments to ensure open communication and the timely identification and mitigation of modern slavery risks.

All suppliers are subject to critical review before engagement, with particular care being taken for those suppliers operating outside of Australia. Suppliers are required by Davidson Group, for example through contracts of engagement, to share the Group's commitment to and compliance with modern slavery standards in their own operations and supply chains. Each supplier is provided with a representative from Davidson Group to facilitate processes of consultation and notification in the event of supply chain auditing, or suspected issues of modern slavery. Supplier agreements reference obligations to meet Davidson's Modern Slavery Statement.

In 2020 Davidson Group introduced a Modern Slavery Policy which reflects our processes and procedures for identifying modern slavery risks and our commitment to acting ethically and with integrity in all our business relationships and within our supply chain.

As part of our initiative to identify and mitigate risk, we have in place systems to:

- Identify and assess potential risk areas in our workplaces and supply chains;
- Conduct due diligence to identify and mitigate the risk of slavery and human trafficking connected to our operations and supply chains;
- Develop, improve and implement appropriate remediation measures; and
- Protect whistle blowers.

Where problems are identified we will work with the supply chain member to develop corrective actions within agreed timeframes as part of remediation plans.

## Assessing effectiveness

We assess the effectiveness of our approach to modern slavery by tracking our actions and outcomes in a modern slavery register. Operating under the direction and oversight of the Board, Davidson Group has a compliance team who actively enquires into our employee and contractor staff, as well as into our suppliers and further supply chains. Davidson Group's external legal compliance as well as its internal compliance with policies and practices is thus continuously reviewed throughout the year, particularly triggered by any developments in our risk profile or governmental guidance.

Davidson Group is also ISO9001:2015 (quality management system) certified which requires us to conduct internal audits at planned intervals throughout the year to identify risks in our organisation, compliance, resources, operational control, competence and monitoring. Davidson Group are also externally audited annually to ensure we retain our ISO9001:2015 certification.

## 2021/22

### Risk management

In 2021/22, Davidson has reviewed and enhanced our approach to managing risks in our operations and supply chains.

The Risk Committee provides a forum for Davidson to proactively raise, discuss and review broad risk mitigation strategies, and respond to any identified or suspected modern slavery in our supply chains.

In 2021/22, the Risk Committee:

- Redefined its purpose and membership with a new Risk Committee Charter;
- Restructured its Risk Register to accommodate emerging risk categories;
- Increased meeting frequency; and
- Centralised administration, governance, and reporting accountability.

The Risk Committee reports directly to both the Group Executive Leadership Team and Boards of Davidson Group entities.

### Training

In 2021/22, Davidson also implemented a revised and updated modern slavery training module developed by, and available on, our learning and development program. This compulsory training module provides an important overview to Davidson staff and contractors on obligations, strategies and consequences with respect to modern slavery in Australian supply chains.

Davidson staff and contractors are also provided with up to date modern slavery information, via a dedicated resources page on the Davidson intranet with useful summaries and links.

### Assessment

We have not identified any suspected or actual instances of modern slavery through audit programs this year and have assessed our actions as adequate.

## Looking forward

As we progress, Davidson Group will continuously review and develop frameworks and processes to identify, assess and control the risks of modern slavery of our supply chains ensuring effectiveness and improvements if necessary.

Over the next year, Davidson Group will continue to focus on:

- Reviewing and updating our suite of risk-related policies and governance control measures;
- Further develop annual review process with members of senior management;
- Stakeholder engagement on this issue, including participating in industry discussions on more detailed supply chain enquiry procedures; and
- Incorporating requirements into existing assurance processes.

## Approval

This statement is a joint statement submitted by Davidson Group (Aust) Pty Ltd and on behalf of its subsidiaries.

This statement was approved by the Board of Davidson Group (Aust) Pty Ltd on 1 December 2022.



Trent McMahon  
CEO & Director  
Davidson Group