

# **Modern Slavery Statement**

IVE Group Limited (ABN:62 606 252 644)

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This Modern Slavery Statement is prepared by IVE Group Limited and its controlled entities (together "IVE") for the financial year ended June 30 2023.

As a leading holistic marketing company, IVE recognises the importance of ensuring that we engage in business practices that identify and operate in a manner that will minimise the risk of forced labour, servitude or human trafficking activity (Modern Slavery) in our business and across our supply chains.

- » The Australian Modern Slavery Act 2018 requires that IVE;
- » identify risks of Modern Slavery practices within its operations and supply chains;
- » implement controls to assess and address these risks;
- » create business awareness through training and education forums;
- » review and manage all supply chain governance and on boarding procedures;
- » report and submit a publicly available Modern Slavery statement in accordance with the Modern Slavery Act 2018.

IVE supports the introduction of the Modern Slavery Act 2018. Modern slavery involves the exploitation of human beings and is completely unacceptable. IVE has a responsibility to identify and remove the risks of Modern Slavery within our operations and supply chains. IVE has implemented a comprehensive set of controls to ensure the integrity of our own operations and our suppliers.

This report outlines actions taken in the FY23 financial year by IVE to identify and minimise the risk of Modern Slavery in its operations and supply chain.



# 2. Reporting Entity and Consultation.

IVE Group Limited (ASX: IGL) is a publicly listed company incorporated in Australia with headquarters based in Sydney, Australia. With over 2,000 employees in NSW, VIC, ACT, WA, SA, QLD, TAS, New Zealand and Guangzhou (China), IVE has grown to be one of Australia's largest holistic marketing companies with operations across Australia and New Zealand as well as an offshore sourcing supply chain though a wholly owned entity in Guangzhou, China.

# **Entity Structure**

Since listing in 2015, IVE has grown both organically and through acquisition. At June 30, 2023 the wider IVE Group consisted of the following controlled entities (a mixture of both operating and non-operating entities) -

- a. Caxton Print Group Holdings Pty Limited
- b. IVE Group Australia Pty Limited
- c. IVE Group Victoria Pty Limited
- d. Caxton Print Group Pty Limited
- e. Task 2 Pty Limited
- f. Pareto Fundraising Pty Limited
- g. James Bennett & Associates Pty Limited
- h. IVE Employment (Australia) Pty Limited
- i. IVE Employment (Victoria) Pty Limited
- j. Taverners No. 13 Pty Limited
- k. AIW Printing (Aust) Pty Limited
- l. SEMA Holdings Pty Limited
- m SEMA Infrastructure Pty Limited
- n. SEMA Operations Pty Limited
- o. John W. Gage & Co Pty Limited
- p. IVE Distribution Pty Limited
- q. Lasoo Pty Limited
- r. AFI Branding Solutions Pty Limited
- s. IVE Employment PWO1 Pty Ltd
- t. IVE Employment PWO2 Pty Ltd

All entities are incorporated in Australia except for: IVE Group Asia Limited (incorporated in Hong Kong, China), Guangzhou IVE Trading Company Limited (incorporated in China), and Reach Media New Zealand Limited (incorporated in New Zealand).



In this statement a reference to IVE, IVE Group, we or our, is a reference to IVE Group Limited and its controlled entities.

IVE's vision and purpose is to maintain and grow a highly respected, strong and sustainable business for all key stakeholders –staff, clients and shareholders. Core to this is ensuring a value proposition that maintains its relevance to our clients' ever evolving communications needs. IVE unlocks value for our stakeholders through the powerful combination of our brand values that are the guiding principles of our behaviour – core to this is our 'one company philosophy'. Accordingly, as our operating entities largely, use the same policies and processes, operate in the same or similar sectors and share many of the same suppliers, this Modern Slavery Statement provides a single, consolidated description of their actions to assess and address Modern Slavery risk.

## Consultation

IVE notes that the Board of Directors ("Board") is responsible for the overall corporate governance of IVE Group Limited, including adopting appropriate policies and procedure, monitoring the operational and financial position and performance of IVE, and overseeing its business strategy, including approving the strategic goals of IVE. The Board is committed to ensuring that IVE, its Directors, officers and employees operate in an appropriate environment of corporate governance. Accordingly, the Board has created a framework for managing IVE, including adopting relevant internal controls, risk management processes and corporate governance policies and practices, which it believes are appropriate for IVE's business and that are designed to promote the responsible management and conduct of IVE.

There is strong consultation between the Board and IVE senior management across all the IVE businesses, as well as centralised IVE Group operational focus on -

- » Procurement;
- » Supplier on-boarding processes;
- » Environmental Social Governance (ESG) & sustainability related practices;
- » Occupational health and safety management;
- » ISO quality certification;
- » Information technology infrastructure and management; and
- » Employee recruitment and payroll practices.

Senior management within IVE have been delegated responsibility for implementing appropriate controls and processes on the above and to report back to the Board as required.

Further information on IVE Group Limited can be found at www.ivegroup.com.au



# 3. Integrated Service Offering and Supply Chain Risk.

### **About IVE**

## Founded in 1921, IVE is Australia's leading holistic marketing company.

With an unmatched breadth and depth of offering, we guide our clients from idea to execution. Specialising in Creative Services, Data-Driven Communications, e-Commerce, Brand Activations, Premiums & Apparel, Packaging, Print, Integrated Logistics and Household Distribution, we bring together the capabilities, specialists and technology needed to make customer connection seamless. Our offering is supported by robust integrated technology platforms that make complex marketing simpler for our clients.





## Supply Chain Risk

IVE provides its clients with an array of services including - manufacturing, sourcing (including importing), storage and distribution, 3PL, letterbox delivery, digital catalogues, permanent and temporary display material, promotional items, mailing services (direct and essential), digital mailing, SMS and EDM communications. Accordingly, the supply chain is vast and varied covering a wide range of activities, materials and products.

As described in the FY2022, MSA Statement, during 2022, IVE undertook a materiality assessment with a third-party independent consultant to define IVEs material ESG issues and inform the development of a robust and transparent sustainability framework. Included, as part of this project was a detailed examination of IVEs supply chain data to identify the presence of Modern Slavery risk in IVEs supply chain.

The review utilised IVEs procurement data together with Life Cycle Assessment methodology, data from global sources and a literature review to identify likelihood of Modern Slavery risk and to provide each spend category with a low, medium, high or very high rating of risk likelihood. The project also included a social risk hotspot analysis whereby supply chain data was examined to create a Modern Slavery risk heat map thereby providing a key step to understanding risk areas and allowing a targeted and strategic approach for implementing risk minimisation actions and prioritised supplier engagement.

IVE identified the following key spend categories.

## **IVE Spend Categories**

Paper	Promotional consultants & sourc- ing	Aluminium supplier	Printing apparel	BBQ supplier
Walkers	Plastics (bags)	IT/Hardware	Plastic consumables	Plastics supplier
Transport / Freight / Logistics	Contract labour	Security	Storage facilties	Pest control
Outwork commercial printing & related print services	IT Infrastructure	Awards - Promo Merch	Plastics material supplier	Industry association
Rent	Repairs & maintenance provider	Insurance	White goods suppliers	Office cleaning
Postage	Decorator	Paper rolls and tickets	IT / Managed service	Creative
Ink & Consumables	Cleaning & general mainaintence	Metal fabrication (Perm display)	Customs Broker	Shelving for permanent displays
Consumables / Parts / Maintenance	Security products	IT / Digital content and data asset management	Travel Agent	Catering
Packaging / Carton	Raw material for display	Electrician	Aluminium window	Fuel supply
IT/Software	Forklift rental / Servicing	Die making (cutting formes)	Confectionary suppliers	Car rental
Electricity / GAS	Designers / Creative / Agency	Advertising & Marketing Agency	Office stationery	Fulfilment services



Promotional Merchandise	Raw material for AFI bus unit (fabric)	Plastic card supplier	Disability agency	Plumbers
Labour hire	Utilities	Plant & Equipment (maintenance)	Flag Supplier	Motor vehicle fuel card
Plant & Equipment (capex)	Waste removal	Production supplies - plastic	Signage	Fire safety
Envelopes	Recruitment	Warehouse shelving / Racking	Stationery office supplies	First aid training
Plates (aluminium)	Office supplies / Stationery	Labour hire - intellectual disabilty providers	Shop fittings	Fire monitoring
Consultants	Recycling	Plastic fabrication (Perm Display)	General hardware	Water
Finance leases	Labels supplier	Proofing machine service & toner	Material / Fabrics supplier	Locksmith
Apparel / Textiles / Uniforms	Gift cards	Forklift gas	Outsource labour / Installer	First aid suppliers
Pallets	Legal services	Contractor	Spill-kits	Equipment hire
Maintenance contract & parts	Cartons / packaging	Associations	Government	Bank
Installers	PPE - Supplier	Vinyl	Mailhouse Services/Postage/ DM IT Services	

The examination of the data allowed for a systematic identification of latent risk of Modern Slavery in IVEs supply chain and categorisation into Very High Risk, High Risk, Medium and Low Risk categories. The supply risk areas identified in the heat map as having potential / latent risk for IVE to cause, contribute to, or be directly linked to Modern Slavery through its operations and supply were identified in accordance with the following:

**Very high risk** - The risk in some of these categories is driven from the overseas supply chains and the extraction of raw materials of fibre-based products, such as paper and packaging, and the extraction of raw materials and manufacturing of promotional merchandise (mainly plastics and textiles). Textiles are also a risk driver for uniforms and PPE, as well as material/ fabric supply. The extraction and manufacturing of chemicals drive the risk for categories such as die making and plastics. The very high risk in spend categories such as plant and equipment, outwork commercial printing & related print services, IT/Software, proofing machine service & toner is due to the raw materials extraction and manufacturing of electronic equipment and machinery. Materials used for display such as plastic, and metals have a risk due to both extraction of raw materials as well as manufacturing. When services are low skilled and/or offshore, these can carry a very high risk.

**High risk** - The risk in these categories is also driven from the overseas supply chains, in the extraction of raw materials of fibre-based products. Similar to very high risk, the high risk in ink and consumables is driven by the extraction and manufacturing of chemical products, and the risk in plant and equipment, maintenance contract & parts, repairs & maintenance provider and white goods suppliers, by electronic equipment and machinery. Domestic low skilled labour refers to labour occurring in Australia. This may arise through contracted services and the use of labour hire. Low skilled labour has a higher likelihood of



using irregular or migrant workers that are particularly vulnerable to exploitation and abuses in the workplace. Example of this is walkers, transport / freight / logistics, rent and storage facilities (including services), cleaning and general maintenance, office cleaning, security and catering. Some services, such as IT services, promotional consultants, and travel agency may be offshored. Offshore workers may be located in areas where the national laws to protect them are inadequate or poorly enforced.

Medium - The risk in the aluminium plate supply category is driven by the extraction and manufacturing of aluminium products. Similarly the risk for office stationery, office supplies; and flag suppliers, respectively is driven by plastic products and textiles. Fibre-based products remain one of the main drivers of risk for medium risk categories such as envelopes, and pallets. The extraction of raw materials and the manufacturing of plastics and metals drive the risk for electrical spend. The risk in forklifts, equipment hire, general hardware, consumables / parts / maintenance and IT infrastructure is driven by the manufacturing of electronic equipment and machinery, and the raw extraction of the materials required in their production.

Low high risk - The low risk is mainly driven by professional services and skilled labour services, as well as utilities, insurance and fuel.

As a result of this previous data analysis IVE was able to identify the following categories of supply as a priority in the 2023-2024 Procurement Projects plan (discussed in section 4 below) -

- (a) Raw materials production and supply - paper products used in the print production process both onshore and offshore (web and sheet fed paper, labels, cardboard, envelopes), packaging products, used in storage and distribution, ink products, solvents, machinery and equipment used in manufacturing, storage and distribution.
- (b) **Labour** - outsourced supply of casual / temporary labour hire as required, recruitment and engagement of independent contractors and the walker network.
- (c) **Transport / Freight and logistics** - outsourced supply of casual / temporary labour hire as required, recruitment and engagement of independent contractors.
- (d) Offshore services and products procurement – offshore supply chain for print and machinery related products, offshore supply chain for premiums and merchandise, personal protective equipment (PPE) and permanent retail display products manufactured and imported by IVE.
- (e) Services procurement for business operations - supply of services - electricity, gas, cleaning, security, freight, post, telecommunications, IT /software, hardware.
- (f) Onshore services and products procurement - local supply of print and machinery related products, finished goods, services supplies and business services.



# 4. Actions Taken to Address Risk of Modern Slavery

This statement describes the actions that have been taken by IVE during FY23 to address the risk of Modern Slavery occurring within IVE's business and supply chain. IVE believes in identifying and supporting suppliers that share our commitment to the prevention of Modern Slavery within our business and supply chain and have implemented a number of baseline requirements to be met before suppliers are able to participate in our supply chain.

During the reporting period IVE has focused on identifying actions to assess and address the risk of modern slavery within our business and supply chain.

## (a) IVE Care

As in previous years, core to IVEs business is IVE's driving principle - IVE Care. The IVE Care program is focused on ensuring and improving the wellbeing, diversity, inclusion, and health and safety of all our employees. We believe in 'a better you, a better workplace' for our people and for their families. IVE Care focuses on ensuring and improving two key areas: the quality and security of our products and services for our clients and the wellbeing, safety, diversity and inclusion of our people. We seek to ensure this through -

- (i) Workplace Health and Safety - IVE is committed to providing a healthy and safe workplace for all of our employees, contractors, visitors and suppliers. IVE Care embeds WH&S principles into everything that we do.
- (ii) **Employee Health and Wellbeing** - IVE Care programs include initiatives such as the Employee Assistance Program (EAP) which provides access to independent, confidential counselling and advice from qualified and experienced psychologists, and allied health professionals. Education, information programs and health and wellbeing campaigns are also made available through the EAP to assist employees in making changes for a healthier lifestyle. Our EAP continues to be an excellent source of support and benefit for employees dealing with a range of difficult circumstances. As well as the EAP program, IVE has continued other initiatives providing our 2,000+ employees with access to a wide range of support and benefits such as annual flu injection programs, the IVE Rewards program, IVEs Diversity and Inclusion Program and the Workplace Giving program.
- (iii) Quality assurance - IVE applies rigorous quality assurance processes to everything we do. This is core to the long-term relationships we enjoy with our clients. As an ISO 9001:2015 certified organisation, we are uncompromising in our commitment to quality from marketing technology through to production and distribution.



- (iv) Environmental Management - IVE holds ISO 14001:2015 environmental certification, Program for Endorsement of Forest Certification (PEFC) chain of custody certification, and Forestry Stewardship Council (FSC) chain of custody certification.
- (v) **Ethical Sourcing** - IVE is a member of the Supplier Ethical Data Exchange (SEDEX) and is committed to ethical sourcing, anti-bribery and corruption practices. IVE is working towards partnering with suppliers who embody our social compliance requirements and meet with globally accepted sourcing standards such as SA8000/ WCA/BSCI/SMETA.

#### (b) **Procurement Project**

- (i) **Supplier Review** - During the last half of FY2023, IVE commenced a review of its procurement processes identifying uncontracted key spend areas and contracted spend areas identified as very high or high risk in the Modern Slavery risk assessment detailed in section 3. This involved putting identified Suppliers through a formal tender / re-contracting process that included an assessment based on a formalised Supplier Survey and Modern Slavery Assessment Survey. The process is ongoing and is continuing into FY24. The aim is to ensure that areas of modern slavery risk within the supply chain are formally assessed and identified and that mitigation measures based on an objective risk based weighting assessment inclusive of Modern Slavery risk are taken before continued or new trade with IVE occurs.
- (ii) Centralisation of Supplier On-boarding process - Formalised Supplier on-boarding procedures commenced including establishing a centralised database of contracted and approved suppliers for all business units to access.
- (iii) **Annual re-evaluation of Suppliers** - the project will establish a program for the re-evaluation of approved suppliers based on their risk profile, supplier reliance and response to the supplier re-assessment which includes the Modern Slavery assessment through a Modern Slavery Questionnaire. The Procurement Project is ongoing and will continue across all IVE spend areas identified in section (3) above.

#### (c) **Training**

In March 2023, Modern Slavery risk and awareness training was conducted for all managers, supervisors and relevant staff with purchasing functions, across IVE Group. Training is scheduled as an annual undertaking and will be automatically issued to relevant participants on expiry of training certifications.

#### (d) **Whistleblower Policy**

IVE encourages employees and external stakeholders including Suppliers to report or raise issues of legitimate concern, including any unacceptable behaviours or business practices, without fear of victimisation, detriment or other retribution. This includes any potential or actual modern slavery related concerns or breaches of the Supplier Code of Conduct. In 2023 IVE engaged an independent agency called Stopline to provide a confidential 24 x7 Whistleblower Hotline and investigative service allowing employees, suppliers and customers of IVE to report suspected or actual wrongdoing in the IVE business.



#### (e) Standardised Supplier terms of trade

As part of the Procurement Project, where non-contracted suppliers have been identified these suppliers have been re-engaged based on IVEs standard supplier terms which include and require agreement to basic obligations and warranties including compliance with applicable law, compliance with the Modern Slavery Act, compliance with the IVE Code of Conduct for all suppliers, and providing IVE with the ability to audit that Suppliers supply chain. This process is ongoing and will continue throughout 2023 and 2024.

#### **(f)** SEDEX (Supplier Ethical Data Exchange)

IVE is an active member of Supplier Ethical Data Exchange (SEDEX). Supplier membership is highly regarded and allows IVE to assess the risk in labour standards, health and safety, environmental impact and provide supply chain visibility and provides supply chain visibility when assessing supplier engagement.

#### (g) **Supplier Desktop Assessment**

The on-going monitoring procedure requires suppliers to participate in an annual supplier desktop assessment. This aims to ensure a better understanding of IVE's supplier risk profile and to ensure that IVE's suppliers better understand and are able to identify their supply chain for modern slavery risk. For the offshore premiums and merchandising supply chain IVE engages third party auditors to carry out supply chain monitoring and compliance audits.

#### (h) Risk register

Modern Slavery has been incorporated into the IVE risk register to ensure visibility at Board level. IVE has no appetite for risk associated with non-compliant and fraudulent suppliers and IVE has developed controls to ensure suppliers are measured by ongoing monitoring and assessment.

#### (i) **Human Resources**

IVE's Human Resources and payroll teams have standardised policies and procedures in place that support our day-to-day operations to ensure all staff engagements and labour hire services meet legal requirements and IVE's core values. This includes obligations on labour suppliers to confirm Fit to Work and Right to Work checks as part of employee and contractor on-boarding, agreement with standard IVE supplier terms, confirmation of award compliance and standardised policies and procedures.

FY23/24 will see further development, resourcing of and roll out of the above actions. This will assist in ensuring that Modern Slavery risk is readily identified and, if identified as present or risk of being present, remediated accordingly.



# 5. Grievance Process

IVE Employees, Suppliers and their workers and contractors are encouraged to report actual or suspected breaches of the Supplier Code of Conduct or this policy via email to whistleblower@ivegroup.com.au.

All reports submitted are treated confidentially. In 2023 IVE engaged an independent Whistleblower hotline services accessible by phone, post and online portal 24 x 7 that can be used for reporting of grievances and concerns in relation to unethical or illegal behaviour, including modern slavery and human trafficking.

# 6. Assessing the Effectiveness of IVE's Actions

IVE's Board and senior management recognise that IVE must continue in its efforts to identify and implement actions to effectively reduce the risk of modern slavery within the business and supply chain.

As processes for identification of these risks mature and advance, and the necessary risk mitigation practices are implemented, collecting data and measuring the effectiveness of action and reporting on outcomes will be crucial. This will form a critical component of our ESG Strategy and continuing effort on the Procurement projects and process enhancements outlined in this statement going forward.

IVE will continue to work to develop further detailed actions to address the risk of modern slavery as well as to develop tools to assist with measuring the effectiveness of IVEs actions.

This statement has been approved by the IVE Group Ltd Board on the 19th December, 2023.

Matt Aiken

Chief Executive Officer **IVE** Group

