

**Modern Slavery  
Statement**

# Statement Overview

**DFP is committed to ensuring that all individuals engaged by or through DFP are treated fairly, ethically and in compliance with legislative requirements.**

According to the International Labour Organisation there are more people in slavery today than any time in history.

*“More than 40 million people around the world were victims of modern slavery in 2016, including about 25 million in forced labour, and 15 million in forced marriages. If they all lived together in a single city, it would be one of the biggest cities in the world.”*

**International Labour Organisation**

The Australian Modern Slavery Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. The worst forms of child labour includes situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

DFP is committed to ensuring that all individuals engaged by or through DFP are treated fairly, ethically and in compliance with legislative requirements. DFP is committed to respecting fair labour practices and protecting work seekers from exploitation and modern slavery. As a member of the RCSA, DFP has made a professional commitment and is accountable for conducting business in a way that avoids causing or contributing to exploitation through its activities.

In line with this commitment, DFP has reviewed and updated its policies and procedures to explicitly address the standards outlined in the Modern Slavery Act 2018 (Cth) (Commonwealth Act), and has delivered Modern Slavery training to its internal employees. This work is underpinned by the DFP policies outlining the principles and conduct with which we expect our people to comply.

By ensuring that all employees, on-hired workers and clients comply with the principles and conduct expected of them, DFP can be confident that the risk of modern slavery occurring within our direct business operations is low. However, we recognise that DFP may be exposed to the risk of modern slavery through our supply network. DFP acknowledges its responsibility to prevent or mitigate the risk of exploitation linked to its operations, including its suppliers. In response, we conducted a Supplier Modern Slavery Risk Assessment to identify, prevent and mitigate actual and potential adverse modern slavery risks and impacts within our supply chains.

# Reporting Entity

**DFP employs approximately 100 permanent staff and approximately 2,000 casual or contract staff.**

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DFP Recruitment Services Pty Ltd as trustee for DFP Business Trust – a fixed unit trust - and is a wholly-owned subsidiary of DFP Recruitment Holdings Pty Ltd. We do not own or control any other entities and are therefore not required to undertake a consultation process. The company employs approximately 100 permanent staff and approximately 2,000 casual or contract employees.

DFP provides services to clients based solely in Australia with the supply of labour in major regional centres or capital cities. We do not supply labour overseas. Our major categories of procurement include Human Resources, IT and Technology, Professional Services, Property and Travel.

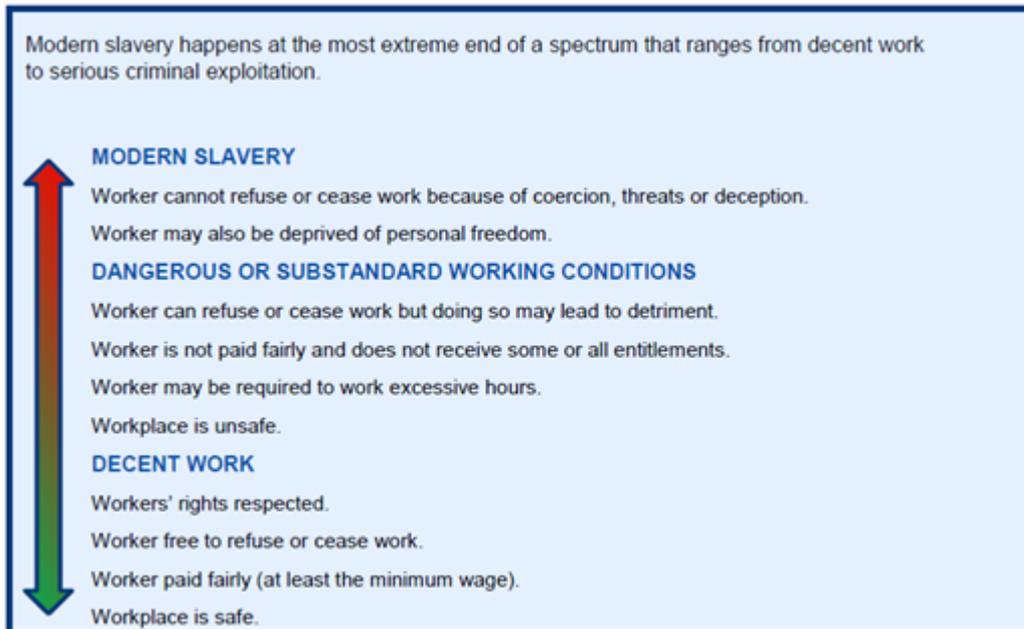
Engaging thousands of people each year we are committed to upholding human rights and fair labour practices and recognise the responsibility we have in the supply of skilled labour throughout the recruitment selection and placement cycle.

# Modern Slavery Risks in our Operation

DFP can be confident that the risk of Modern Slavery occurring within our direct business operations is low.

To understand the risk of modern slavery in our operation and supply chain, we assessed the potential for DFP to cause, contribute to or be directly linked to modern slavery.

By ensuring that all employees, on-hired workers and clients comply with the principles and conduct expected of them, DFP can be confident that the risk of modern slavery occurring within our direct business operations is low.



DFP has policies, procedures and practices in place which assist us in ensuring 'Decent Work' is provided and that exploitation of workers is identified and eliminated.

Our Employment Contracts and Terms of Assignment documentation as well as on-boarding documentation clearly identify conditions of employment, safety and complaints procedures. Conditions of employment are audited and assessed to be in line with the Australian National Employment Standards and the Modern Awards.

*“...our comprehensive people and human rights-focused policy suite supports DFP’s commitment to the eradication of modern slavery...”*

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The DFP Code of Conduct outlines our zero tolerance for discrimination, harassment, workplace violence, bullying, child and forced labour within our business, our supply networks, the businesses of our clients and their supply chains. The Code was updated in 2021 to explicitly outline our expectations in regards to exploitation and modern slavery, citing the types of practices that may lead to it, and our employees’ role in mitigating these risks and reporting such practices where identified.

Our Whistleblower Policy identifies modern slavery and provides further guidance to our people in relation to the behaviours we expect and outlines the mechanisms available for the reporting of behaviour or practices that are inconsistent with this.

In addition to the Policies mentioned above, our comprehensive people and human rights-focused policy suite outlined below support DFP’s commitment to the eradication of modern slavery.

- DFP OHS Commitment
- Code of Ethical Practice
- DFP Environmental Policy
- Anti-Discrimination, Anti-Harassment, EO and Bullying Policy
- Flexible Work Arrangements Policy
- Leave Policy
- Workplace Diversity and Inclusion Policy
- Corporate Social Responsibility Policy
- Grievance Policy and procedure
- Family and Domestic Violence Policy

The Code of Ethical Practice and Corporate Social Responsibility Policy were updated in 2021 to explicitly reference expectations in regards to protecting workers from exploitation and modern slavery.

Further to our policies, procedures and employment documentation, in 2022 DFP added a Modern Slavery e-learning module to our internal training offering, included it as part of our induction program for new staff and asked all existing staff to complete it

While these measures allow DFP to be confident that we are not causing or contributing to modern slavery practices, we recognise that DFP may be linked to modern slavery practices through our supply network.

# Modern Slavery Risks in our Supply Chain

We recognise that DFP may be linked to modern slavery through our supply network.

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Within our supply chain, the following have been identified as the key indicators of Modern Slavery risks:

- Vulnerable populations – this includes new migrants, people living with disability and indigenous communities.
- Business models – models structured around high risk work practices or low wages.
- High risk product or service categories - either in clients we supply to or from whom we receive goods.

Further to this, DFP identified several high-risk industry sectors in our supply chain:

- IT and technology
- Commercial cleaning
- Property management

Finally, we assessed the likelihood of the different categories of risk, as well as the current measures in place that mitigate that risk.

# Modern Slavery Risks in our Supply Chain

Finally, we assessed the likelihood of the different categories of risk, as well as the current measures in place that mitigate that risk.

Type of Exploitation	DFP Risk Area	Risk Level	Current Mitigation Measures
<b>Trafficking in Persons</b> <b>Slavery</b> <b>Servitude</b> <b>Forced Labour</b>	<ul style="list-style-type: none"> <li>Poor unsafe working conditions</li> <li>Excessive hours</li> <li>Restriction of movement</li> <li>Substandard accommodation</li> <li>Withholding identity and travel documents</li> </ul>	Very Low	<p>Individuals are free to apply for work, free to turn down an offer of work and free to leave work at any time.</p> <p>Mature certified OHSMS fully implemented including workplace assessment prior to placing workers on sites</p> <p>Identification papers not retained.</p> <p>Excessive hours report generated weekly, reviewed and managed for continued pattern.</p> <p>Modern Awards and interpretation rules applied as a minimum</p> <p>Timesheets recorded</p> <p>Detailed payslips provided</p> <p>Payroll independently audited by external Accountancy firm.</p> <p>Direct and frequent contact with workers on third party worksites.</p>
<b>Debt Bondage</b>	<ul style="list-style-type: none"> <li>Unauthorised payroll deductions, fees or debt recovery</li> <li>Underpayment of wages</li> </ul>	Low	<p>We do not charge any fees to individuals for the sourcing of the employment opportunities they are offered.</p>
<b>The Worst Forms of Child Labour</b>	<ul style="list-style-type: none"> <li>Underage employees</li> </ul>	Very Low	<p>Photo identification is verified and we will not place anyone under the legal age of employment.</p>
<b>Deceptive Recruiting for Labour or Services</b>	<ul style="list-style-type: none"> <li>Deceptive or coercive recruiting</li> <li>High risk industry x migrant or disadvantaged workers</li> </ul>	Very Low	<p>Every worker is provided with a copy of the terms and conditions of their assignments including rates of pay, hours worked and entitlements. Employment Agreements are standardised for all workers in all sectors.</p>

# Our Approach to Managing Modern Slavery Risks

## DFP Operations

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DFP has reviewed its employment engagement documentation, policies, procedures, and Terms of Business and identified those that need to be updated to directly address the risk of exploitation and modern slavery, and meet the standards outlined in the Modern Slavery Act 2018 (Cth) (Commonwealth Act). The documents identified were updated in 2021 to explicitly address the risks of modern slavery and exploitation.

This work is underpinned by the suite of DFP policies listed above, which outline the principles and conduct with which we expect our people to comply, and, where relevant, explicitly reference expectations relating to Modern Slavery. Furthermore, DFP adopts a continuous improvement model to all business processes and will continue to monitor and review our operations to ensure we optimise and improve our approach to Modern Slavery risks.

As well as ensuring the DFP policies and procedures are communicated, understood and complied with, we ensure that:

- All our legal obligations are complied with in the recruitment and onboarding process.
- We have a range of employment engagement methods depending on the needs of our stakeholders but in all cases, individuals are free to apply for work, free to turn down an offer of work and free to leave work at any time.
- We do not charge any fees to individuals for the sourcing of the employment opportunities they are offered.
- Our employment conditions adhere to the legislation relevant to the jurisdiction in which we operate.
- Every single worker is provided with a copy of the terms and conditions of their assignments including rates of pay, hours worked and entitlements.

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- We do not supply accommodation directly for our employees – however we do conduct risk assessments of host employers where accommodation is supplied through an employment arrangement.
  - The results of these risk assessment are documented in our safety systems and our Candidate Relationship Management system. These audits are conducted prior to the initial placement of candidates and then every 12 months (or more frequently if applicable).
  - Our Candidate Relationship Management systems have controls in place that prevent placements from occurring without the appropriate work rights and skills checks being completed. These controls are also used to manage the expiration of working rights and professional accreditations/memberships for continuing placements of staff.
  - We provide ongoing training for our people within DFP who are responsible for sourcing and placing candidates and those in Human Resources related roles as well as our corporate teams responsible for sourcing. This now includes an e-learning module on Modern Slavery.

We have used available internal resources, external published sources and feedback from organisations, such as the International Labour Organisation, to inform our risk assessment approach.

# Our Approach to Managing Modern Slavery Risks

## Supplier Risk Assessment and Due Diligence

DFP is committed to working with our supply partners to identify where there may be risks of modern slavery practices in their operations and supply chains.

To effectively map our supply chain, we undertook a detailed review of our suppliers, their industry sector and our spend with them. As outlined above, DFP identified several high-risk industry sectors in our supply chain:

- IT and Technology
- Commercial cleaning
- Property management

We determined a combination of industry risk and spend threshold was an appropriate approach which would capture both our biggest suppliers, and those who potentially present the highest modern slavery risk.

	Low Risk Industry	High Risk Industry
Quarterly Spend	\$15k	\$1k

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Through this process, we identified the key supply partners we wanted to prioritise to gain a better understanding of the specific supply risks within their downstream supply chains. Having identified these key suppliers, DFP created a Supplier Modern Slavery Risk Assessment Survey to identify, prevent and mitigate actual and potential adverse modern slavery risks and impacts within our supply chains. The survey was issued to DFP's key suppliers in 2021, and requested information relating to:

- How modern slavery risks are addressed in their organisation
- The level of visibility over their supply chain
- An assessment of the various types of modern slavery related risk in their organisation and supply chain
- The policies, processes and procedures in place to mitigate or respond to modern slavery related risks

The results of our Supplier Modern Slavery Risk Assessment survey form the basis of the following actions for our business:

- Gap analysis and continuous improvement of our existing controls.
- Designing and drafting enhancements (or new controls) to respond to identified risks in the form of documentation, policies, processes, training and amendments to contracts with our suppliers where appropriate.
- Designing new/enhanced risk controls as appropriate.
- Assessing the effectiveness of the actions we have taken to date.

In 2021, the risk assessment of survey responses did not trigger any of these actions. Subsequent surveys may trigger these actions.

# Assessing Effectiveness

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To assess the effectiveness of the actions it is taking to identify and address the risks of modern slavery practices within its operations and supply chains, DFP has:

- Reported on modern slavery risks and actions taken in leadership and executive meetings
- Introduced KPIs to measure the implementation of actions taken to address modern slavery risks

Further to this, in the coming 12-18 months, DFP will:

- Review new and existing suppliers to determine those that meet our industry risk and spend thresholds
- Conduct a second Supplier Modern Slavery Risk Assessment Survey for identified suppliers
- Review changes in risks and mitigation based on Supplier Survey responses
- Track actions taken to address risks highlighted in the Supplier Survey responses
- Report on DFP's achievement of the Modern Slavery training KPI in leadership and executive meetings

# Continuous Improvement

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In 2020, DFP established our Modern Slavery Framework to develop and include the following:

- Modern Slavery Training
- Modern Slavery Statement

In 2021, DFP:

- Developed Client and Supplier Modern Slavery Risk Assessment
- Reviewed policies and procedures

In 2022, DFP:

- Reviewed the Supplier Modern Slavery Risk Assessment Survey responses and determined that no further action was required
- Incorporated explicit expectations relating to Modern Slavery risks in relevant policies
- Added a Modern Slavery e-learning module to our internal training offering, including it as part of our induction program for new staff and asking all existing staff to complete it

Over the next 12 to 18 months, DFP will focus on reducing any potential Modern Slavery risks and some of our key initiatives include:

- Improving and expanding our engagement with and understanding of our suppliers and their supply chains with regards to human rights and modern slavery including the evaluation of the Supplier Risk Assessment Survey responses
- Including the Modern Slavery training as part of the induction training for all new starters

# Approval

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This statement was approved by the Board of Directors for DFP Recruitment Services Pty Ltd atf DFP Business Trust on 2<sup>nd</sup> September, 2022.



Kate Coath

Chief Executive Officer

2<sup>nd</sup> September, 2022