

# RGF Staffing APEJ Modern Slavery Statement



# Modern Slavery Statement # 4

*RGF Staffing APEJ believe that forced labour has no place in our operations or supply chains and that business and governments need to work together to make progress on this complex issue.*

## 1. Governance

RGF Staffing APEJ Pty Ltd, is an Australian private company (ABN 84 603 568 403) registered at Level 13, 345 George Street Sydney, Australia. Operating in Australia, New Zealand, Hong Kong and Singapore.

We are part of a global group “RGF Staffing”, one of the world's largest HR services providers, with activities in Europe, the UK and North America.

The Board of Directors consists of four (4) directors who are nominated and elected by the full board of directors of RGF Staffing B.V. (executive & non-executive directors jointly).

RGF Staffing APEJ is a group of entities who share common directorships, with day to day management delegated to the CEO. Each of our wholly owned subsidiaries is managed by a Managing Director who is accountable to the CEO.

RGF Staffing APEJ operates with a centralised governance framework for our group of companies to leverage and oversee modern slavery risks within our supply chains and operations. Our Board of Directors formally reviews and approves our annual Modern Slavery Statement before it is published.

## 2. About this statement

This statement is made under the Australian Modern Slavery Act 2018 (Cth) and sets out the actions taken by RGF Staffing APEJ (Asia Pacific Excluding Japan) to assess and address modern slavery risks in our operations and supply chains during the period ending 31<sup>st</sup> March 2024. It is a consolidated description of the activities undertaken across the RGF Staffing APEJ group. We actively engage and consult with our wholly owned subsidiaries in the development of this statement.

Businesses (Brands) within the RGF Staffing APEJ group include:

- AHS Services Group (Australia & New Zealand)
- Aurion Corporation
- Chandler Macleod Consulting
- Chandler Macleod Hong Kong

- Chandler Macleod Managed Training Services
- Chandler Macleod Staffing Services
- Chandler Macleod x-PO Talent Solutions
- Leaders IT Services
- OCG Consulting
- Peoplebank Group Australia
- Peoplebank Singapore
- Vivir Healthcare

### 3. Our Operations

We engage 1,000 internal employees and around 29,000 employees on client sites. We service 3500 clients from our 23 offices spread across Australia, New Zealand, Hong Kong and Singapore and service clients who require recruitment & labour hire services, managed services (payroll, hospitality, allied health) and psychometric testing & training services across a number of industries including:

- mining,
- industrial,
- IT services,
- payroll,
- healthcare,
- hospitality,
- manufacturing,
- distribution, and
- Government services

### 4. Operational Risk

RGF Staffing APEJ is part of a group that prioritises people and opportunities for all and which places people and wellbeing at the centre of its operations and values. We recognise the importance of our role in promoting better conditions for all, and hold the belief that our programs and actions, through ripple effects, we will create global waves by supporting underprivileged people and people with a distance to the labour market to reach their full potential. (These are discussed in more detail in the Progress section of our report).

Activity within our own operations is assessed as low risk.

We have implemented strong measures to minimise modern slavery risks within our own operations including:

1. Regulatory compliance activities to ensure compliance with all:
  - Applicable, Prescribed Legislation,
  - applicable orders, directions and
  - any industrial instrument relevant to any of our entities
2. Maintaining appropriate licences for our operational activities
3. A suite of policies, procedures and systems to manage and oversee the employment and ongoing support of all our people (internal and client based)
4. Various committees to ensure regular governance and oversight of our operations in line with our policies, procedures, licence conditions and relevant standards, codes and guidelines.

We maintain a suite of controls (validations and checks) to ensure that our people are placed with clients who uphold human rights and who have similar values to our own, this reduces the likelihood of an individual being exploited by unscrupulous organisations or where deceptive or discriminatory activities take place. These include:

**Client validations** – Due diligence checks to ensure:

- Our candidates are provided with genuine employment opportunities, matched to their skill set/s, fair pay for their time and services, safe working environments and conditions that meet or exceed National Employment Standards.
- That we partner with organisations offering legal and legitimate working opportunities

**Job add validations** – to ensure that our advertisements are at all times, free from:

- Language that discriminates.
- Illegal or illegitimate activities.
- Obligations on applicants to make payments for placement, a job or any other unlawful charges.

**Fair Hiring Practices Focus** - to ensure people from all groups are able to unleash their potential through:

- Honest open job advertisements
- Partnership with bodies / organisations dedicated to improving employment outcomes.
- Training for our recruitment and commercial teams to ensure they are able to identify risk factors when speaking with individuals.

## 5. Our Supply Chain

Our supply chain consists of over 1500 suppliers located in around eleven (11) countries across the world, with the majority in Australia, New Zealand, USA, United Kingdom, India, the Philippines, Canada, the Netherlands and Japan.

Our primary categories of Tier 1 spend includes:

- Technology & related services
- Facilities (Building Services, Cleaning, security waste, travel)
- Business support services (stationary, consumables, apparel, merchandise)

## 6. Supply Chain Risk

Whilst we continue to partner with geographically dispersed suppliers, the majority of these are Australian (ASIC registered) Incorporated companies (subsidiaries) conducting their business locally. These partners have a strong awareness of modern slavery risks; and are bound by the same modern slavery obligations as we are.

Our supply chain assurance program remains risk based and focused on the following:

- the industry or sector of the supplier,
- the location of the supplier, or the location of where primary goods are sourced,
- the particular products and or services provided by the supplier.

During 2023, we identified international labour sourcing arrangements as having the *potential* to increase our modern slavery risk rating and so undertook a review of these suppliers, particularly in our hospitality business. Whilst no instances of Modern Slavery were identified, we made a decision to cease engagement with any operators whose sourcing model was 100% reliant on migrant workers.

A small portion of our businesses engage offshore partners, again, whilst no evidence of modern slavery was identified, we chose to reduce the volume of these offshore activities to reduce the *potential* for any risks to arise.

## 7. Awareness and training

We believe that training remains essential to increasing awareness of modern slavery and reducing the associated risks. We continue to deliver training specific to modern slavery and identifying the risks across our business for all levels as part of induction and our annual compliance training program.

## 8. Progress against our goals to date

During the reporting period, the following supplier information has been captured:

Supplier information points	Count	Percentage
Total number of new suppliers	427	100%
Number of suppliers who completed a Modern Slavery Risk Assessment Survey	103	24%
Number of new supplier with a Low Risk Score	91	88%
Number of new suppliers with a Medium Risk Score	12	9%
Number of new suppliers with a High Risk Score	0	0%
Number of slavery indicators identified within the supply chain	0	0%

Further analysis into suppliers where a ‘medium risk’ was, has shown that these suppliers would not actually be considered ‘medium risk’ but rather, the way our survey is worded/structured does not allow for particular nuances. For example, the following scenario is not considered an indicator of modern slavery, however our survey (in its current state) does not provide for this: Contractors invoice the supplier for their time/services, which is why payslips are not provided and/or why superannuation payments are not made.

We also acknowledge these figures don’t adequately show the number of suppliers not required to go through our Modern Slavery Risk Assessment survey process (e.g., Sole Traders) who should be excluded from these figures.

With regards to our 2023 specific initiatives, our progress is outlined in the following table.

Goal	Activity
Creating opportunities for all: Deepening our focus on placing individuals from marginalized or minority groups, reflecting the communities we serve.	<p><b>RGF Connect:</b> The program aims to assist minority groups in securing employment by recognising their skills through a behavioural-based model. Our program connects individuals from various communities including those facing adversity due to cultural and linguistic diversity, long-term unemployment, single motherhood, and age-related bias (for example) to access the labour market using a series of supports such as psychometric testing, group training, individual support/mentoring.</p> <p><b>Our Reconciliation Action Plan</b> Led by our Reconciliation Action Plan Group we have successfully run five (5) indigenous recruitment programs, contributing to bridge the gap between indigenous people and rewarding, paid job opportunities. We have also increased the % of our supplier spend with organisations that support indigenous procurement and provide excellent working conditions for their people.</p>

Continuing our efforts to unlock opportunities and improve incomes for women; connecting both social and environmental agendas.

Improving our Supplier Management program to enable reporting on our supplier population by category, geography and analysis of the associated risks by our system.

Update our Supplier Engagement Principles to incorporate other social and environmental agendas

### **No Glass Ceiling Program**

We continue to partner with the Victorian Government to source, train, upskill and cultivate Women over 45 years of age into new lines of employment regardless of their background and prior working experience. Our intensive post placement support and individualised case management ensures that these women continue to unleash their potential in the workplace as they gain skills and experience.

### **The Peoplebank Scholarship with Monash University**

For a female who is facing challenges, and is aimed to help address the gender imbalance in IT jobs, whilst also assisting someone who may not otherwise be able to afford to study. This is aligned to our purpose “Connecting people to opportunities for a better life” and also aligns to the Peoplebank Australia Diversity and Inclusion priorities.

**Work 180 Certification** – During the year, our business participated in the ‘Work 180 – Great Places to Work for Women’ certification process and we are proud to say that we achieved and now hold this certification, which supports our commitment to fair fostering fair and equal workforces.

### **Supplier Program Improvements**

In 2023, we expanded the activity of conducting risk assessments (through training) to people involved early in the vendor selection process, so that modern slavery risks are considered before detailed engagement activities commence.

### **Supplier Engagement Principles Update**

To further support our sustainability goals, we have extended our supplier engagement principles to include our other social and environmental goals. This included the addition of a requirement for our suppliers to comply with our new Anti-Slavery Policy.

## 9. Measuring Effectiveness

Our Sustainability Committee is responsible to ensure that we are continuously improving our understanding of modern slavery issues (globally) and meeting our long term sustainability goals.

During 2023, we set goals to:

- Ensure our supplier code of conduct was provided to all new suppliers,
- Ensure our local whistleblower hotline was integrated into the RGF Staffing HQ hotline to ensure that we provide another avenue for raising Modern Slavery, Human Rights and other concerns,
- Implementing additional Human Rights due diligence activities
- Ensure that all our internal employees completed refresher Modern Slavery Training.

A 100% achievement score was reached through our Governance stream for these activities.

We acknowledge that more detailed measures will assist us to better validate and improve our Modern Slavery Framework. We will establish these as part of our certification activities addressed in the next section of this report.

## 10. Our next steps

In 2024, RGF Staffing APEJ aims to attain external certification for our sustainability system (of which our Modern Slavery Framework is a part of) including environmental, social and ethical performance, through EcoVadis.

In addition to the benchmark scoring by EcoVadis against our peers, we will also establish a set of internal benchmarks to enable us to better monitor not just our sustainability performance, but also Modern Slavery Framework and its effectiveness.

In addition to our certification program, we have also established the Internal Women's Taskforce – an initiative open to all women in the business. Through monthly discussions, this group will document 'what is important to women in the workplace'; the positives, challenges, key motivators, and desired initiatives. Taskforce is run by women for women. Findings and key learnings from the taskforce will be presented to our Group Leadership Team for discussion, endorsement, and commitment to ensure delivery of endorsed initiatives to set timelines.



## Statement of Approval

RGF Staffing APEJ and each of its subsidiaries, are managed by the same core team comprising of Chief Executive Officer and Chief Financial Officer, who continue to keep the board informed of the reporting requirements and actions taken including our future goals and commitments.

This statement was approved by the Board on behalf of RGF Staffing APEJ and each of its related entities on 16<sup>th</sup> April 2024, and is signed on behalf of the Company and all its subsidiaries by Brent Leahy, Director and Chief Executive Officer.

Signed,

Brent Leahy, CEO & Director.

Date:

**RGF Staffing APEJ**

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