

## Davidson Group (Aust) Pty Ltd and Subsidiaries

# Joint Modern Slavery Statement

For the reporting period of 1 July 2023 – 30 June 2024

## Introduction

Davidson Group is committed to eradicating acts of human trafficking, debt bondage, child or forced labour, servitude, slavery and other slavery like practices. 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 our goods and services supply chains.

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 Executive and Boards Pty Ltd (ABN 89 167 748 816),
  - Davidson Group Services Pty Ltd (ABN 85 124 816 708),
  - Davidson HR Consulting Pty Ltd (ABN 38 161 578 310),
  - Davidson Recruitment Pty Ltd (ABN 50 167 132 523),
  - Davidson Technology (Aust) Pty Ltd (ABN 51 167 752 258),
  - Davidson Technology Consulting Pty Ltd (ABN 23 163 298 379), and
  - Inspired Apps Pty Ltd (ABN 71 145 171 071)
- (together, **Davidson, the Group, Davidson Group, we, our or us**).

## Structure & consultation

A privately owned business operating in Australia for over 30 years, Davidson is focused on enhancing workplace performance. Davidson has a national presence with offices in Brisbane, Sydney, Melbourne, Adelaide, Canberra and Darwin engaging circa 180 internal employees and 850 contractors and consultants delivering services for our clients. The Davidson team includes a broad range of specialists across its three core service lines, Business Advisory, Search and Recruitment and Technology Consulting.

The effective control and management of the Davidson Group (including all reporting entities and subsidiaries above) is held by the Davidson Group (Aust) Pty Ltd Board, who are assisted by their appointed executive management team. Davidson Group shares corporate functions such as risk, legal, human resources, marketing, information technology, cyber security and finance. All subsidiaries within the Davidson Group are subject to Davidson Group policies, procedures, and standards.

In the process of preparing this joint statement, the Board of Davidson Group (Aust) Pty Ltd through its delegated representatives collaborated with personnel from each subsidiary and reporting entity to gather insights and contributions for this statement.

## Operations, supply chains & risks

In our recruitment and labour hire service lines, Davidson Group provides on-hire independent contractors and employees with equitable, fair, and legally compliant working conditions. We understand the critical importance of adhering to modern slavery obligations. Currently, the majority of our candidates and employees are sourced from Australia and engaged under Australian law, benefiting from a jurisdiction with well-established labour laws and robust worker rights protection. Our consulting and advisory service lines also prioritise the welfare of our personnel and are currently based in Australia.

Certain sectors are associated with heightened risks of labour law non-compliance. Private and public commentary such as the Victorian Labour Hire Authority identify these as: commercial cleaning, horticulture, security, and meat processing. Davidson does not provide candidates or professional services to these sectors.

In line with our commitment to addressing modern slavery, we have assessed our direct operations as **low risk**. We take a proactive approach to identify, prevent, and mitigate modern slavery risks, even in low risk environments.

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 maintenance and cleaning, property management, security, information technology infrastructure, financial services, office supplies, consumables and other support services including staffing, legal and employee benefit providers.

## Actions to address risk

Davidson Group has a suite of policies to ensure working conditions are compliant with Australian law and free of modern slavery. Our policies apply to internal employees as well as contractors and consultants. Our commitment is to provide a workplace that prioritises safety and freedom from discrimination.

Davidson verifies the identity and right to work of individuals as part of onboarding. Regular audits of wages, working hours, and overall conditions are conducted to verify ongoing compliance. We maintain communication with our employees, contractors, and suppliers to address any operational or supply chain practices that may pose risks related to modern slavery. In instances where direct supervision of contractors by Davidson or our clients is impractical (for example, working from home), we have established systems including check-ins and remote work risk assessments, to facilitate open communication and promptly identify and address potential modern slavery risks.

Prior to engagement, all suppliers undergo evaluation, with special emphasis on those with operations beyond Australia's borders. Davidson Group mandates, including through contracts, that suppliers align with the Group's dedication to modern slavery standards, ensuring compliance within their own operations and supply chains.

Davidson's established Modern Slavery Working Group has functions to continuously assess our risks and approach to modern slavery and assist with our clients' procurement procedures.

Davidson Group's Modern Slavery Policy embodies our methodologies and protocols for recognising modern slavery risks. It underscores our unwavering commitment to ethical practices and integrity in all our business relationships, particularly with our supply chain. As part of our proactive approach to risk identification and mitigation, we have established systems and procedures to:

- Identify and evaluate potential risk areas in our workplaces and supply chains.
- Conduct due diligence to identify and mitigate the risks of slavery and human trafficking associated with our operations and supply chains.
- Develop, enhance, and implement appropriate remediation frameworks and measures.
- Safeguard whistleblowers who play a crucial role in exposing malpractices.

If concerns are identified, we have agreed and contractual processes to facilitate collaboration with supply chain members to formulate corrective actions within appropriate and agreed-upon timeframes or remediation plans.

## Assessing effectiveness

To gauge the effectiveness of our modern slavery approach, Davidson record actions and outcomes in a modern slavery register. Under the guidance and supervision of the Board, Davidson Group is supported by a dedicated Risk Committee and risk and compliance team. This team helps oversee compliance of our employees, contractor staff, suppliers, and extended supply chains. The external legal compliance of Davidson Group, along with its adherence to internal policies and practices undergoes ongoing scheduled and 'as required' checks and reviews throughout the year by this team as well as input from external legal and compliance specialists.

Additionally, Davidson Group holds ISO9001:2015 certification for its quality management system. This certification entails conducting internal audits at scheduled intervals throughout the year. These internal audits are designed to identify risks in various aspects of our organisation, including compliance, resources, operational control, competence, and monitoring. Furthermore, Davidson Group undergoes external audits on an annual basis to ensure the retention of our ISO9001:2015 certification. This external validation reinforces our commitment to maintaining high-quality standards and regulatory compliance in all facets of our operations.

## 2023/24

### Risk management

In financial year 2023/24, Davidson reviewed and refined methodology for managing risks within operations and supply chains. The Risk Committee and Modern Slavery Working Group continued to serve as a dedicated forum for Davidson to actively initiate discussions, scrutinise, and assess comprehensive risk mitigation strategies in relation to identified or suspected modern slavery within our supply chains.

### Vendor Management

In the last twelve months Davidson Group enhanced and codified our approach to vendor procurement and management. Endorsed by the board of directors, our enhanced procedure formalises due diligence activities to be undertaken on the regulatory compliance and ethical commitments of suppliers and potential suppliers. Requesting modern slavery policies, procedures or statements is part of our diligence steps in the context of the vendor risk management.

### Training & Policies

In financial year 2023/24, Davidson included modern slavery training as compulsory compliance staff requirements. This compulsory training module delivers a comprehensive overview to Davidson staff, outlining their obligations, strategies, and consequences pertaining to modern slavery within Australian supply chains.

To ensure ongoing awareness, Davidson staff and contractors receive updates on modern slavery information through dedicated resources page on the Davidson intranet. This page offers valuable summaries and links.

Davidson also reviewed and updated our leave policy to align with current standards, the evolution of service offerings, and the organisation's core values. Davidson's employee leave entitlements go beyond legislated minimums, including extended paid domestic and family violence leave.

Our Whistleblower Policy underwent a thorough review, covering hazards and incidents involving behaviour that is illegal, unethical, oppressive, discriminatory, or dangerous to health and safety. Reporting procedures were expanded to encourage the disclosure of dangerous practices. A third party whistleblower hotline was also included as an additional safe means of reporting. This policy is communicated to all staff.

## Regulation Update

Davidson monitored the passing of the Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill 2023 in May 2024. At the time of publishing this statement, we acknowledge that Australia's first Anti-Slavery Commissioner has been appointed. We support the functions and objectives of the new office.

## Assessment

We have not identified any suspected or actual instances of modern slavery through audit programs this year, and we have deemed our actions as satisfactory.

## Looking forward

As we progress, Davidson Group will continuously review and develop frameworks 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;

- Monitoring the guidance, activities and publications of the Anti-Slavery Commissioner and incorporate these into our approach as relevant;
- Reviewing and updating our suite of risk-related policies and governance control measures;
- Stakeholder engagement on possible issues and strategies, with industry focus; and
- Incorporating requirements into existing assurance processes.

## Approval

This joint statement is submitted by Davidson Group (Aust) Pty Ltd and on behalf of its subsidiaries. The Board of Davidson Group (Aust) Pty Ltd officially approved this statement on 10 December 2024.



Trent McMahon  
CEO & Director,  
on behalf of the Board of Directors of Davidson Group (Aust) Pty Ltd