

MODERN SLAVERY STATEMENT FY2021 / 2022

This Statement is published on behalf of Interstate Enterprises Pty Ltd and its wholly owned subsidiaries 'Tecside' commitment to eliminating the exploitation of people under the Modern Slavery Act 2018 (Cth) (the Act). Tecside is committed to supporting ethical and compliant practices in the provision of our services. References to 'Tecside', 'we', 'us', 'our' or the 'agency' are inclusive of the related entities that carry on the Tecside business globally.



OVERVIEW

At its broadest, the term 'modern slavery' refers to any situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power or deception. Modern slavery therefore encompasses slavery, servitude, child labour, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour or services.

WHO WE ARE

We are a leading global recruitment & contract staffing agency combining unmatched industry knowledge, an outstanding compliance record and superior customer service to deliver results to our key stakeholders.

As a professional services agency, people are our most valuable asset. We are a global company that strives to provide our Clients with the best boutique service and solutions.

STRUCTURE & CONSULTATION

Tecside is a privately owned business with our corporate office based in Western Australia. We have operational offices located in WA, SA, NSW, VIC and QLD and reaching candidates globally. During FY21/22 we employed 47 employees across our operations to connect over 4174 candidates to our 396 Clients with recruitment services.

The effective control and management of Tecside is held by the Interstate Enterprises Pty Ltd Board. Tecside operates with board members, the executive committee and corporate functions such as Safety, Legal, People & Culture, and Finance. All entities within Tecside are subject to our policies, procedures and standards of practice.

As part of the preparation and development of this statement, the Board engaged with personnel from each department to inform and provide contribution to this statement.



OUR VALUES

Our values describe who we are and what we stand for; they shape our decisions and actions to guide how we work together.

At Tecside, we have four core values referred to as our DNA:



OUR COMMITMENT

Tecside opposes all forms of modern slavery and forced labour in its operations, and the operations of its Clients and Suppliers. We are committed to upholding the highest standards of ethical behaviour in the conduct of our business and activities worldwide. We support and respect the protection of internationally proclaimed human rights, and endeavour to ensure that Tecside is not complicit in human rights abuses.

Tecside are committed to taking steps to mitigate risk. Our rigorous policies and procedures underpin all activity for our operations, to ensure ethical and legislative standards are upheld. We regularly review our global recruitment policies and procedures, as well as our arrangements for employee welfare. Our employees are provided with safe working conditions and we have the expectation of our Stakeholders that employees will always be treated with dignity and respect.



OUR POLICY FRAMEWORK

We believe that strong internal policies, processes and systems are essential in informing the way we manage the risk of human rights abuses, such as modern slavery, within our own operations and in those of our Clients and Suppliers. Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains and partnerships.

Under the Tecside Code of Conduct all our employees (including directors, agents, contractors and others) who represent our business, must respect and support human rights.

The following Tecside Policies are fundamental to our operational management of human rights as a business;

- Modern Slavery Policy
- Code of Conduct
- Corporate Social Responsibility Policy
- Human Rights Policy
- Sustainability Policy
- Anti-Bribery and Corruption Policy
- Whistle-Blowers Policy

Other internal policies and standards relating to Human Resources, Health and Safety, Security, Community, Environment, Diversity and Inclusion, Ethics and Compliance inform the way we work, and ensure that we aim to respect human rights in the way we do business.

“ IN KNOWLEDGE LIES POWER



POLICIES

PROCEDURE

tecside

OUR SUPPLY CHAIN

Our core business is Recruitment & Labour Hire Solutions, connecting Candidates with our Clients. As an organisation that operates with geographically dispersed customers, partners and suppliers, we recognise that the risk of modern slavery may vary across our business operations. Tecside may utilise Suppliers of Goods and Services from time to time, to support operational functions of our business.

OUR PARTNERSHIPS

We value partnerships and suppliers who support these principles and impart our attitude towards compliance to the organisations we work with. We recognise the importance of this ethos within the labour hire sector and can demonstrate our commitment to compliance through the following steps.

These include:

- award of sector specific employer accreditations
- award of country specific temporary worker licencing authorisations
- membership of employment organisations
- adherence to specific collective agreements adherence to health and safety audits
- assessment of working environments
- adherence to minimum wage regulations
- regular communication and contact with contractors, agencies and clients
- adherence to working time regulations
- requiring contractual commitments from our partners to modern slavery legislation

LABOUR HIRE LAWS

Tecside is fully compliant with applicable labour hire licencing laws, including audit requirements it prescribes. Tecside follow robust onboarding and quality recruitment processes to ensure our employees pay rates are compliant with National Employment Standards (NES) and appropriate Awards as prescribed by the Fair Work Act. Accordingly, we at a minimum annually review our rates to ensure these remain aligned with legislation.



RISK MANAGEMENT & DUE DILIGENCE

As part of our initiative to identify and mitigate risk, we have a legal team based in Australia and work closely with local lawyers in each jurisdiction in which we operate to ensure that we are engaging contractors compliantly, in line with local labour laws. Our legal team works closely with the sales and operations departments to ensure compliance alignment. This enables us to work collaboratively to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect against illegal working practices
- Protect whistleblowers

The following key risk areas have been identified, and policies and procedures are in place to support our Employees in managing Modern Slavery risks.

Recruitment

Where Tecside employs internal or contingent workers, we have embedded fair and rigorous recruitment practices and employment policies & procedures to ensure ethical treatment of all. This includes, but is not restricted to: Fair Work, Diversity & Inclusion and Equal Opportunities Procedures.

To mitigate the risks of Modern Slavery and exploitation, Tecside ensures strict compliance checks are conducted for all candidates it supplies. Our procedure requires us to verify the identity of each worker and their right to work, before supply commences. Our rigorous due diligence procedure ensures we do not enter into contract with people who do not meet our Code of Conduct requirements.

Suppliers

Tecside engages suppliers who comply with relevant laws and regulations. To support operational functions of our business our supply chain may include the procurement of goods and services such as; PPE, office supplies, cleaning services, gifts and branded goods, medical providers, training providers and more. We require our suppliers to act in a socially responsible manner including; not exploiting their labour in any form and are providing fair pay and working conditions.

Clients

Under our Standard Operating Procedure, new Clients are screened prior to conducting business. This process includes conducting a credit application, consultation to align company expectations and values and conducting a worksite visit and safety assessment to mitigate risks. Contingent workforces are never supplied until all due diligence has been completed to satisfaction.

Potential flags raised in the due diligence process are reviewed by Tecside Management. Additional due diligence may be completed to further understand any flags raised. We will not conduct business with anyone who does not meet our standards.

TRAINING OF STAFF

Upon commencement, Tecside employees undertake training aimed at providing context around the Tecside Policies, Code of Conduct, Brand Values and Procedures.

Our Employees are educated and empowered to report any concerns or suspicions about the treatment of others, or themselves, to their Direct Manager and/or to our People and Culture Manager.

Our Whistle-Blowers Policy promotes the reporting of modern slavery concerns and provides protection for any employees that do so. Employees are informed of the policy at Induction and the policy is accessible to staff at any time via our intranet.



GOVERNANCE

Good Corporate Governance is critical to the long term, sustainable success of Tecside. It contributes to value creation and positive outcomes for all our stakeholders. All employees are required to participate in and contribute to the activities which ensure that products and services meet requirements and ensure continuous improvement.

As a Member of Recruitment, Consulting

and Staffing Association, good governance is embedded throughout our business and is the collective responsibility of the Board and all levels of Tecside Management.

Where deficiencies are found corrective and preventative action is taken to ensure continual improvement. Our Continuous Improvement Procedure is outlined in our Employment Relations Management Plan.

REMEDIATION

Any modern slavery related concerns can be raised through the Company's existing reporting mechanisms, our Whistleblower Policy. This applies to any potential issues within either our workforce or supply chain.

These reporting mechanisms provide an opportunity for victims or interested parties to anonymously raise modern slavery concerns about the Company or its supply chain.

Matters raised will be handled in accordance with the policies. Any reports of misconduct are taken seriously by the Company. They will all be assessed carefully to determine whether an investigation is required. While the circumstances of each report may require different steps in response, the Company will assure each response is completed by someone with independence from the allegations in a fair and impartial manner, and as quickly and as efficiently as the reported misconduct permits. As necessary, we will engage with our suppliers to raise modern slavery risks and understand risk mitigation steps implemented by such supplier; If we believe there is a possibility of criminal activity, we will report it to the appropriate authorities.

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, Tecside has a compliance team who actively enquires into our employee and contractor staff, as well as into our suppliers and further supply chains.

Tecside'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. Tecside conduct internal audits at planned intervals throughout the year to identify risks in our organisation, compliance, resources, operational control, competence and monitoring.



A decorative header image featuring several hot air balloons. One balloon in the center is red and has a yellow basket. The other balloons are white with vertical stripes. They are set against a light, hazy background.

LOOKING FORWARD

Tecside is committed to continuous improvement, to strengthen our approach to managing the risk of modern slavery within our business we will ensure;

Client Due Diligence Procedure

Tecside clients operate globally in many industries. We are committed to complying with our client's own practices on the prevention of modern slavery. Tecside has and will continue to participate in our clients' audits of their respective supply chains.

Policy & Procedure Review

We annually review our company policies, procedures and framework guidelines to ensure we continue to meet best practice(s).

Training

Continue to deliver modern slavery training to all internal staff to increase awareness and reiterate process of escalation.

Assurance

Review the current supplier arrangements to ensure best practice.

APPROVAL

This statement has been made in line with the reporting requirements of the Modern Slavery Act 2018. This statement applies to all subsidiaries of Interstate Enterprises Pty Ltd. This statement is approved by Tecside Board of Directors and has been endorsed by the Chief Executive Officer on 1 November 2022.

A handwritten signature in black ink, appearing to read 'Shayne Pollack', written in a cursive style.

Shayne Pollack
CEO & Executive Director
Tecside