

APM GROUP'S MODERN SLAVERY STATEMENT

Reporting period 1 July 2020 to 30 June 2021



The reporting entity

This Modern Slavery Statement is a joint statement made on behalf of APM Human Services International Limited (ACN 639 621 766) ("APMHSI") and all its controlled subsidiaries around the world ("APM" or "APM Group"). APMHSI is a company incorporated in Australia.

APM Group's structure, operations and supply chains

APM Group's head office is at 58 Ord Street, West Perth, Western Australia, 6005. We employ more than 7,000 team members in total locally and around the world.

APM Group is a human services organisation delivering a wide range of services and programs to enable better lives. We operate in 10 countries: Australia, New Zealand, the United Kingdom ("UK"), Spain, Germany, Switzerland, South Korea, Singapore, Canada and the United States of America ("USA"). Our most significant operations are in Australia and the UK.

In the reporting period, our services globally were delivered around the following key service lines:

Employment Services

APM supports jobseekers to find work and employers to fill vacant positions. For jobseekers, APM provides services that include connecting participants with training and new qualifications, job search assistance, interview preparation, workplace modifications, specialised support for people with mental health conditions, counselling, and ongoing support. For employers, APM provides access to a large pool of job-ready candidates and assists employers to establish a diverse and inclusive workforce. APM equips employers with the means to improve employee retention rates (for example through providing post-placement and ongoing support once a client is placed with the employer), increase awareness of workplace health, safety, and inclusion, and provide access to a wide range of wage subsidies.

Health and Wellbeing Services

APM delivers government, insurance and corporate health programs focussed on prevention, management, rehabilitation, allied health, and psychological intervention services. APM's services include vocational rehabilitation services to support return to work and broader health services including assistance with psychosocial and physical wellbeing, diabetes prevention, psychological health, and pain management services.

Communities and assessment services

APM works with individuals to develop support plans for funded and nonfunded support. This includes age care home support assessments and disability support assessments for individuals and employers for ongoing support and return to work arrangements. APM also operates community-based programs including youth, justice, and veterans' services. APM will also in some instances build a support plan which includes both funded and non-funded supports.

Most of our services are provided to government customers, contracted services at national, state, province or local government level. Our government customers make these programs available to individuals who meet relevant



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access criteria and may benefit from them ("Service Users"). We also provide a range of bespoke training, health and wellbeing services to private and public sector entities.

APM trades under multiple brands, which are aligned either by country or for specific types of service delivery. During the reporting year, these included APM (Australia, New Zealand and UK), Ingeus (UK, South Korea, Spain, Germany, Switzerland, Singapore), CiC (UK), Konekt (Australia), Assure (Australia and New Zealand), Communicorp (Australia), FBG Group (Australia), MCI (Australia), WCG (Canada), Ross (USA), and Grant Associates (USA). As at the date of this Statement, we also operate under the brands Acumen Health, Interact Injury Management (Australia) and Dynamic Workforce Solutions (USA).

For the financial year 2020-2021 we obtained goods and services from approximately 4,400 suppliers in Australia alone associated with property, insurance, motor vehicle leasing, cleaning, recruitment, communications, consumables, training and health providers, and consultants. Globally, there are significantly more suppliers. Most of our services are delivered either face to face, or via digital platforms by staff located in the same country as our Service Users. APM Group had a property footprint of more than 750 sites globally.

Our supply chain comprises of the following main categories: sole traders, entities such as partnerships, companies and non-government organisations and other supplies of products and services. Almost universally we acquire products and services locally in country, although our suppliers for IT equipment or office supplies (in particular) may acquire those products internationally.

In delivery of large programs globally we often deliver using complex supply chain partner arrangements, including through not for profits, community organisations, and other private sector providers. These supply chain arrangements often last for the length of the program, which can be more than 10 years in some cases. We also form part of other government providers' supply chains, where they require our expertise, or where it is more efficient or cost effective to deliver through our existing operations rather than through their own.

APM has several consortia or joint ventures around the world which can arise depending on the nature of the programs we are tendering for or delivering services under. The two principal joint ventures we have are with D'Aleph in Spain, and our Veterans Services Contract in Canada.

The risks of modern slavery practices in APM Group's operations and supply chains

APMHSI has considered its operations and supply chains, and considers that the risk that APM has caused, contributed to, or is directly linked to modern slavery practices is very low.

Sector Risk

Given our customers are generally large government customers, there is little sector risk associated with delivery of our services.

Geographical Risk

Other than Singapore, APM's programs are delivered in OECD countries where the risk of modern slavery is low in our operations. We also consider risks of modern slavery in our operations to be low in Singapore.



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Product and Services Risk

We are a service delivery organisation and do not manufacture or supply products. As our services are mostly delivered face to face by white collar workers, the chance of product and services risk is low. There may be some indirect risk of working with suppliers of branded merchandise, IT equipment or facilities management services, if our suppliers have not put in place adequate controls or measures.

Entity Risks

Most of our supply chain is directly procured by APM and in almost all cases is procured in that country where we operate. We have in place procurement controls to ensure we deal with reputable suppliers, and therefore this risk is low.

Actions taken by APM Group to assess and address modern slavery risks

APM Group has carried out a risk assessment to assess the risk of modern slavery either caused by APM Group or linked to APM Group.

Due diligence

APM Group's Risk Management Framework provides the methodology for identification and assessment of any modern slavery risks. The Framework is aligned with ISO 31000:2018 Risk Management Principles and Guidelines.

Following the principles in our Framework, the highest exposures potentially arise in the following areas:

Direct facilities management services to sites	Services such as facilities management consultants, cleaners, fire equipment testing and electrical test and tag. This class of entities is often procured locally and may be of lower value and therefore subject to less governance or scrutiny. The labour is often lower paid and may be vulnerable to exploitation.
Indirect services	Such as utility providers (power, telecommunications), software suppliers and web-based services. These services are often procured generically with little understanding of how the service is generated or where certain elements of it are located (such as call centres etc).
Plant and equipment	Information technology, laptops or mobile phones. This class of entities may have very complex supply chains, operate offshore and source materials and labour from entities with fewer controls to mitigate modern slavery risks.
Products	Stationery supplies, branded merchandise and office furniture. These products are acquired from local suppliers but may be manufactured or sourced from third parties without adequate checks or controls by the vendor.



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The risk review identified robust controls and treatments including:

- Board Governance
- Third Party Service, Financial, Quality, IT system compliance audits, which are often made available to government customers for further review and checks
- Complex and targeted human resource management processes
- Finance and Payroll expertise and systems
- Checks on licences and certifications of service providers
- Binding contracts with service providers requiring compliance with laws
- Statutory audit
- Complaints and whistleblowing procedures advertised externally.

Remediation processes

Maintenance of the current control environment for the APM Group is likely to ensure the risk of modern slavery remains at the lowest level of negligible risk.

In the UK because the APM Group was subject to an existing modern slavery legislative regime, various remediation processes have been well established there such as:

- Publication of a modern slavery statement
- Creation of a modern slavery policy and reporting procedure, Code of Conduct expressly opposing modern slavery, safeguarding policy setting out our duty of care including relating to modern slavery
- Consideration of modern slavery in tender processes and supply chain awards
- Supplier questionnaires and facilitated training to supply chain partners
- Inclusion of standard contract clauses
- Communication of our commitment to eradicate modern slavery across our supply chain
- Recruitment processes to ensure we employ people who can demonstrate personal values that complement the APM Group's values and are the most appropriate people for the role applied for
- Training to employees to be able to identify concerns and to report incidents or suspected human rights breaches, including any suspicion of modern slavery.

For Australia and other APM jurisdictions, the remediation processes that the APM Group has established include:

- Developed a global Modern Slavery Policy, a Supplier Questionnaire and reporting procedures
- Inclusion of standard modern slavery clauses in our standard form subcontractor agreements and seeking to negotiate them into supply contracts
- Liaised with all APM jurisdictions to implement new processes for supplier contracts
- Updated our Procurement Policy
- Added modern slavery as a consideration in our tender processes and supply chain awards
- Commenced creation of a global Code of Conduct, which incorporates Modern Slavery
- Communicated our commitment to eradicate modern slavery across our supply chain
- Reviewed the modern slavery policy and compliance of our merchandise providers in Australia.



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How we have assessed the effectiveness of such actions

APM Group's control environment is regularly reviewed by our Quality & Compliance and Finance teams. Regular internal audits and reviews are carried out in terms of quality issues and other relevant factors.

In the UK, every year since first published, our Modern Slavery Statement has been updated with assessments carried out as to ongoing compliance and improvements.

Consultation with APM Group Members

APM has consulted broadly and involved the CEOs of all relevant businesses in the review of this Statement who are aware of and support the information contained in it. There has been substantial consultation with respect to this statement with Compliance, People and Culture, Legal and group corporate representatives.

Other relevant information

This is the second year of reporting for APM Group on modern slavery, other than in the UK; a copy of Ingeus' Modern Slavery Statement can be found here <https://ingeus.com/uk/who-we-are/modern-slavery-statement>.

This statement was approved by the board of APM Human Services International Limited on 22 November 2021.

Greg Meyerowitz
Group Risk and Compliance Director
APM Human Services International Ltd

