

# APM GROUP'S MODERN SLAVERY STATEMENT

Reporting period 1 July 2021 to 30 June 2022



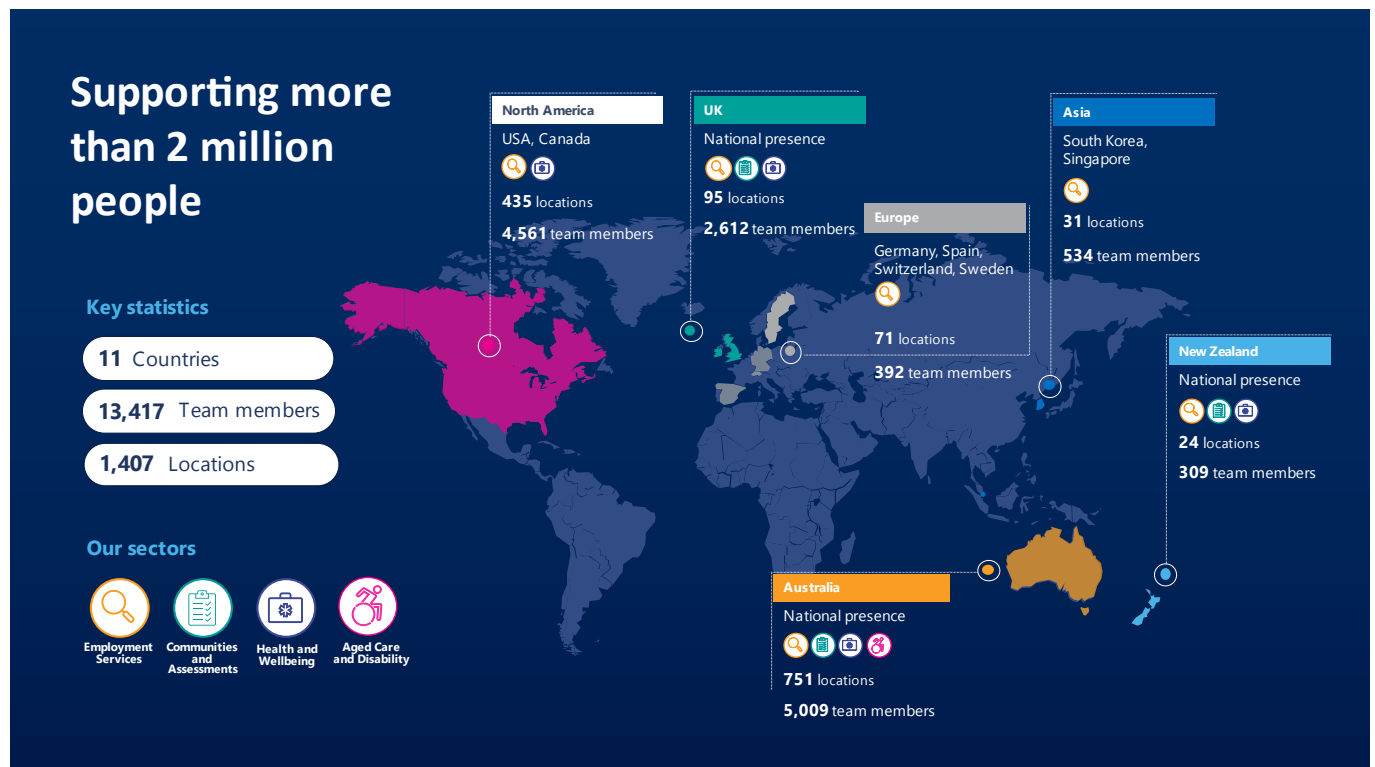
## The reporting entity

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.

APM Group is a human services organisation delivering a wide range of services and programs to enable better lives. We operate in 11 countries: Australia, New Zealand, the United Kingdom ("UK"), Spain, Germany, Switzerland, Sweden, South Korea, Singapore, Canada and the United States of America ("USA"). Our most significant operations are in Australia, the UK and the USA.



\* Figures in diagram accurate following acquisition of Arbor E&T LLC, trading as Equus on 1 November 2022, four months after the reporting period.

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

### Employment Services

APM Employment Services supports job seekers to find decent, sustainable employment and employers to find unique talent to meet their business needs. It includes the delivery of services to individuals who require support to find work, including those with injury, illness or disability, sole parents, youth, older workers, ex-offenders, and people from culturally or linguistically diverse backgrounds. We provide an



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ecosystem of connectivity, mentoring, training and support for job seekers and employers. We work in local markets and collaboratively create sustainable pathways to employment that find the right fit between the individual and the job, building more inclusive and productive economies in the process.

## Communities and assessment services

APM's Communities and Assessments business delivers a broad range of assessment services and community-based programs from early childhood and adolescence, through the working years to older age, supporting people throughout their life to get the help they need. APM works with individuals to develop support plans for funded and non-funded support. We also operate community-based programs including youth, justice, and veterans' services. It includes making sure people get access to the right funding, supports and services at the right time and is a critical part of our mission to enable better lives.

## Health and Wellbeing Services

APM Health and Wellbeing is fast-growing and dynamic. We provide a wide range of health services to thousands of people every year. Our multi-disciplinary Allied Health services offer support across the prevention, early intervention, rehabilitation, maintenance and treatment dimensions of health and wellbeing to government agencies, employers, insurers and directly to the public. It includes the delivery of multi-disciplinary Allied Health and psychology services focused on prevention, treatment and rehabilitation (medical, psycho-social and vocational) on behalf of individual, government, insurance and corporate clients.

## Aged Care and disability

At APM, we believe in the power of inclusivity and participation regardless of a person's age and stage in life. The Disability and Aged Care business is our newest at APM. Operating in Australia, it aims to provide a range of in-home and community-based support services for people living with disability and older people to empower them to meaningfully participate in daily life and help build more inclusive communities. The clients we support in this business are typically participants in the NDIS or recipients of the Australian Government's Home Care Package. It includes the delivery of support services catering to the Disability and Aged Care sectors with services including plan management, support coordination and an in-home care support services marketplace.

Most of our services are provided to government customers, with services contracted at national, state/province or local government level. Our government customers make these programs available to individuals who meet relevant 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 by specific type 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), Clustera (Sweden) Assure (Australia and New Zealand), Konekt, Communicorp, FBG Group, MCI, Lifecare, Early Start Australia, MyIntegra, Mobility, Acumen Health, Interact Injury Management, Biosymm (all Australia) and Dynamic Workforce Solutions (USA) and Dynamic Education Systems (USA), Ross (USA), Grant Associates (USA) and WCG (Canada). Our UK business Ingeus also performed some consulting services in Abu Dhabi. Our Assure and CiC health and wellbeing businesses also offer employee assistance programme services to staff of multinational corporations in many locations through a network of associates, who are trained psychologists. As at the date of this Statement, we now operate under our newest brands Springday (Australia), Equus (USA) and Agilec (Canada).



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For the financial year 2021-2022 we obtained goods and services from approximately 4,200 suppliers in Australia 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.

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 we may 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. In our Australian health businesses, sometimes senior health professionals may retain an ownership stake in the practice they work for.

## 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 and Abu Dhabi, APM's programs were all delivered in OECD countries where the risk of modern slavery is low in our operations. In Singapore, there is potential risk associated with low skilled migrant workforce who may provide services such as site cleaning.

### Product and Services Risk

We are a service delivery organisation and do not manufacture or supply products (other than non-complex health products in our physiotherapy businesses, which we do not manufacture). 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.



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## 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:

<b>Direct facilities management services to sites</b>	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.
<b>Indirect services</b>	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).
<b>Plant and equipment</b>	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.
<b>Products</b>	Stationery supplies, branded merchandise, physiotherapy aids 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.

The risk review identified robust controls and treatments including:

- International Board Governance
- Third Party services, Legal, 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



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- Complaints and whistleblowing procedures advertised externally.

## Remediation processes

The remediation and prevention 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
- Our Procurement Policy contains a modern slavery provision
- 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
- Developed and implemented an APM Global Compliance Questionnaire which requires completion by every business unit across the APM Group, evidencing compliance with APM processes, including modern slavery.

## 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.

## Consultation with APM Group Members

This year we introduced a new process whereby we required feedback from all our global CEOs on the risks and mitigation steps relating to modern slavery and feedback those responses into this statement. There has been substantial consultation with respect to this statement with Compliance, Marketing, Legal and group corporate representatives.

## Other relevant information

This is the third 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>. New legislation is due to come into effect in Canada and we will report in 2023 also in Canada.

This statement was approved by the board of APM Human Services International Limited on 6 December 2022.

**Greg Meyerowitz**  
Group Risk and Compliance Director  
APM Human Services International Limited

