

Asuria People Services Pty Ltd: Modern slavery statement for financial year ending 30 June 2025

1. Introduction

- (a) This Modern Slavery Statement (**Statement**) is prepared by Asuria People Services Pty Ltd (ACN 132 914 633) and its owned or controlled entities (**Asuria, we or our**) pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (**Act**).
- (b) This Statement relates to the reporting period ending 30 June 2025.
- (c) Asuria maintains a zero-tolerance stance towards modern slavery and is committed to improving and upholding ethical and integral business practices.
- (d) We acknowledge modern slavery in its various forms - slavery, servitude, forced labour and human trafficking - as grave violations of human rights.
- (e) Compliant with the Act, we pledge transparency in our operations and endeavour to combat modern slavery within our supply chains. We recognise our responsibility to uphold human rights and ethical standards, and we are dedicated to acting ethically and with integrity in all our business dealings.
- (f) Through ongoing education and feedback, we empower our employees, contractors and suppliers to identify, report and address instances of modern slavery.
- (g) This Statement outlines the steps we have taken - and continue to take - to prevent modern slavery in our operations and supply chains.

2. About Asuria

- (a) Asuria is a leader in providing innovative workforce solutions. We focus on fostering long-term employment opportunities through training and collaboration with employers and governments. In this regard, Asuria works with employers and governments to upskill job seekers, to support them in overcoming vocational barriers, and to progress them into secure, long-term employment.
- (b) Our enterprising culture, rooted in innovation and growth, ensures the delivery of programs and services with empathy, dignity and respect.
- (c) With over 25 years of experience and a global presence, Asuria aids thousands of job seekers annually while assisting companies in navigating government assistance for staffing needs. We have supported more than 100,000 people in more than 180 locations across Australia.
- (d) We have a successful track record of delivering 'frontline' people focused services across the following areas:
 - (i) employment services;
 - (ii) community services;
 - (iii) education and training;

- (iv) allied health support;
 - (v) disability employment;
 - (vi) justice pre-employment;
 - (vii) youth employment; and
 - (viii) First Nations people community services and employment.
- (e) For over 25 years Asuria has successfully delivered human services on behalf of government, across employment, welfare, community services, education, training, self-employment and allied health. Asuria supports the long-term unemployed and most disadvantaged people, youth at risk, single parents, First Nations, justice linked, mature-aged and people with disability to find and keep a job, participate in their community and reduce dependence on income assistance.
- (f) Asuria is a trusted provider to government, with a proven track record for delivering results in payment for outcomes contracts. Asuria achieves this by using place-based approaches and by partnering with local services to ensure job seekers can access wrap around services they need, when they need them, delivered at accessible locations.
- (g) Our services are delivered from a network of 250+ locations globally by a workforce of 650+ employment service professionals, with joint venture partners providing quality specialist support for our clients. Asuria currently supports over 40,000 disadvantaged job seekers each year across a range of employment and training programs.
- (h) In Australia, Asuria delivers 12 government contracts supporting the long-term unemployed and most disadvantaged people, youth at risk, single parents, First Nations, justice linked, mature-aged and people with disability to obtain work, undertake further study, participate in their community, and live full and meaningful lives.
- (i) Asuria has access to a range of government programs and services, including:
- (i) Workforce Australia Services;
 - (ii) Workforce Australia - Self-Employment Assistance;
 - (iii) Workforce Australia - Transition to Work;
 - (iv) Disability Employment Services;
 - (v) ParentsNext;
 - (vi) Employability Skills Training;
 - (vii) Career Transition Assistance; and
 - (viii) Time to Work Employment Service.
- (j) Our [website](#) provides further insights into our operations, suppliers and aspirations to assist thousands of people find meaningful employment aligned with their life experiences and skills.

Lead by results, for people

40+

Years of Experience

350+

Locations Globally

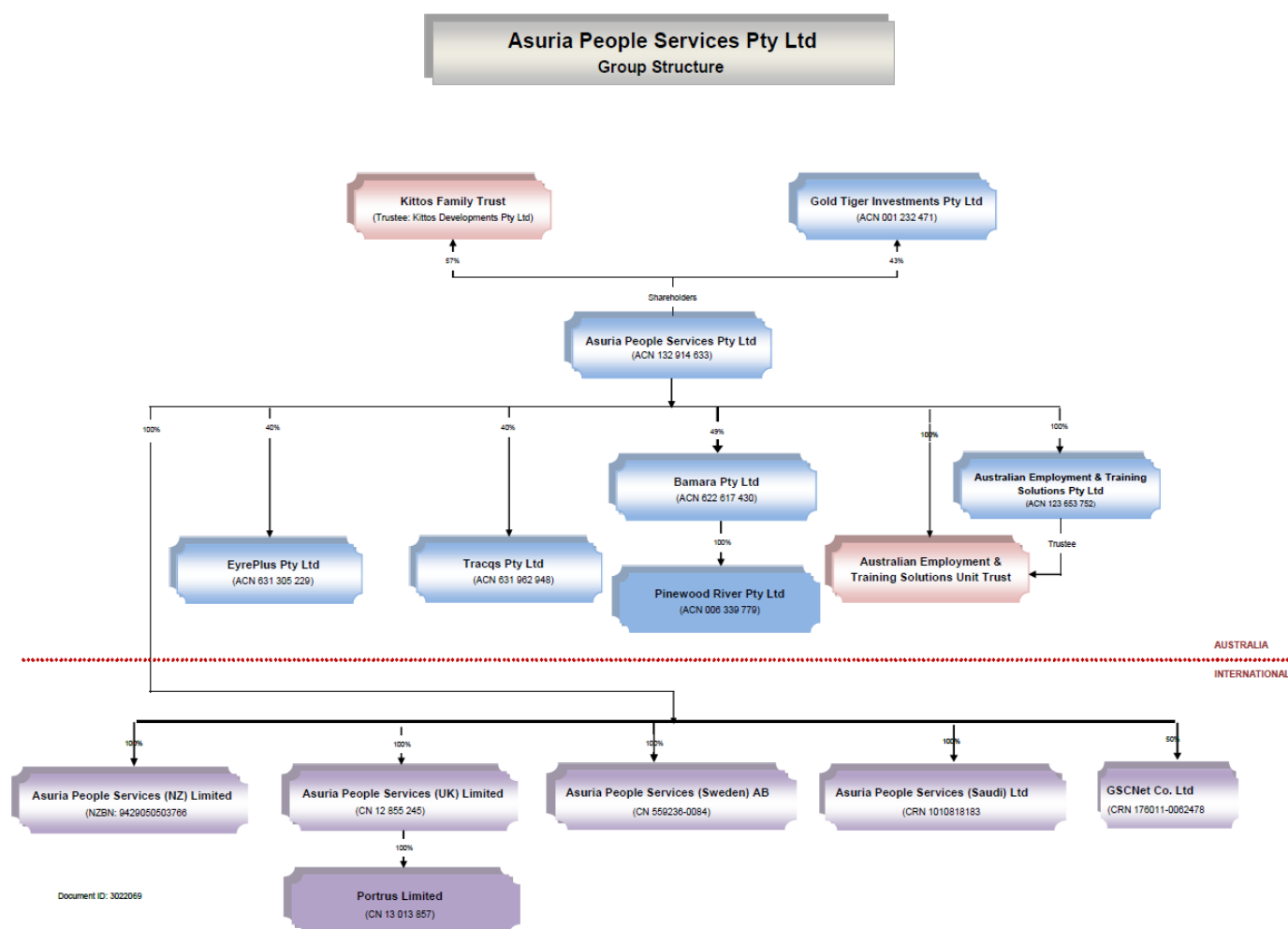
50,000+

Customers Assisted Into
Work Each Year



3. Our structure, operations and supply chain

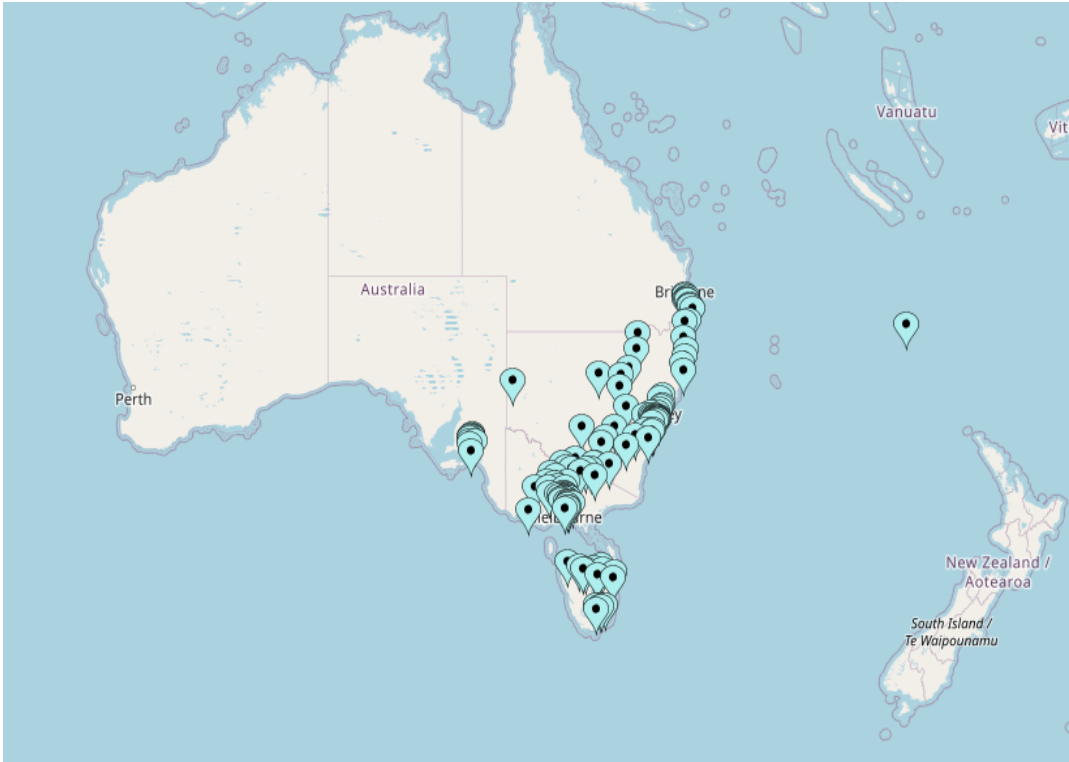
- (a) Asuria is a 100% Australian privately owned company with numerous global operating subsidiaries. We maintain ongoing consultation with our owned and controlled entities to support a consistent and coordinated approach to managing modern slavery risks across our operations and supply chains. This includes ongoing engagement with those entities, such as through scheduled team meetings.
- (b) Our group company structure chart is as follows:



- (c) Asuria relies on a diverse network of suppliers to support and enhance the overall operations of our employment services and community services and training. We maintain approximately 2,000 suppliers across Australia and approximately 250 suppliers in Sweden, who play a crucial role in various aspects of our operations including:
- (i) technology and infrastructure;
 - (ii) subcontractors for employment, community and training programs;
 - (iii) project contractors for tender writing, marketing activities and IT project implementation;
 - (iv) overseas suppliers for international business opportunities (such as the United Kingdom and Sweden).

4. Our locations

- (a) Asuria is headquartered in New South Wales at Level 17, Tower A, 821 Pacific Highway, Chatswood, 2067 and has 195 locations across Australia.



- (b) We currently operate in New South Wales, Queensland, South Australia, Victoria, Tasmania and the Australian Capital Territory as follows:

STATE /CITY	ACT	Norfolk Island	NSW	QLD	SA	TAS	VIC	Grand Total
Grand Total	1	1	72	13	20	26	62	195

- (c) Our operations span several countries, making it essential to address the risks associated with modern slavery and human trafficking.
- (d) Our commitment to combatting modern slavery extends to all our locations and operations.

5. Overview of our supply chain

Our supply chain comprises various elements essential for providing crucial services and support to the Asuria operations, including the following:

5.1 Property and office services

- (a) Our operations rely on equipment, materials and supplies necessary for the provision of employment services. This includes office equipment, furniture and consumables.

- (b) Additionally, we engage with maintenance and office supply providers (eg cleaning and stationery), together with security and utility service providers to maintain the safety and functionality of our premises.

5.2 Technology and hardware

- (a) The IT supply chain is integral to the Asuria operations. We engage external technology providers to maintain and deliver software, telecommunication and professional services to assist us with providing our services. This includes software, hardware and data security services.
- (b) As a technology enabled company, we engage external technology providers to maintain and deliver software, telecommunication and professional services to assist with providing services to our clients, candidates, contractors and employees. These technology providers may be large multinationals, such as Hewlett Packard.
- (c) As we leverage technology to deliver our services efficiently, we are mindful of the risks of modern slavery within the IT supply chain. This includes potential exploitation in the manufacturing of hardware components, as well as the sourcing of software development and data security services.

5.3 Subcontractors for employment and training programs

- (a) We collaborate with subcontractors to implement various employment and training programs aimed at assisting job seekers.
- (b) While these partnerships are essential for expanding our reach and impact, they also introduce risks of modern slavery, particularly if subcontractors do not adhere to ethical labour practices in their operations.

5.4 Contractors for other projects

- (a) In addition to employment programs, Asuria engages contractors for other projects, such as tender writing, marketing activities and project management services.
- (b) These contractors play a vital role in supporting our initiatives and enhancing our service delivery. However, their involvement in our supply chain also poses risks of modern slavery, especially if the contractor is an entity with unethical labour practices.

6. Risks of modern slavery in our operations and supply chain

In view of our business model and our relevant supply chains, we consider the risk exposure throughout Asuria to be generally low.

Nonetheless, we recognise the importance of addressing and mitigating the risks of modern slavery within our operations. Below are the key areas of concern:

6.1 Geographical risks

- (a) Operating in diverse regions, including United Kingdom, Sweden and Saudi Arabia, exposes Asuria to varying levels of modern slavery risks.
- (b) Any risks will be mitigated by awareness, communication and integration of policies, and the implementation of a Supplier Code of Conduct.
- (c) While we are not currently actively operating in Saudi Arabia, we may potentially engage suppliers and contractors in Saudi Arabia in the future.

6.2 Industry risks

- (a) Certain industries, such as construction, agriculture and hospitality, are known to have higher incidences of modern slavery.
- (b) Asuria may assist candidates with finding jobs within these sectors, however this does not involve any business practices specific to these high-risk industries and are therefore, not notably risky.
- (c) Despite a theoretical risk exposure, we consider the overall risk to be relatively low.

6.3 Customers and supply chain risks

- (a) Asuria works with numerous external suppliers and contractors worldwide. We always aim to follow a risk-based approach.
- (b) Where necessary or advisable, our suppliers and contractors are required to comply with applicable regulations and are strongly encouraged to uphold our compliance standards of anti-corruption, ethics and human rights.
- (c) We work with various suppliers, from local businesses to international corporations.
- (d) Our commitment to ethical practices extends to our supply chain, where we expect all suppliers to uphold the same standards as Asuria against modern slavery.
- (e) We plan to detail this further in our Supplier Code of Conduct, which we anticipate developing and implementing over the next reporting period. This document will set out the standards we expect from our suppliers, including the prohibition of forced labour and human trafficking.

7. Our policies

- (a) We have implemented new policies aimed at preventing modern slavery within our business and supply chains, including:
 - (i) **Modern Slavery Policy:** We provide a framework for our suppliers to meet their legislative and ethical requirements of the Act. It sets expectations for ethical conduct in procurement, defines standards for supplier engagement, and provides guidance to staff on recognising and reporting potential instances of modern slavery.
 - (ii) **Procurement Policy:** Our Procurement Policy outlines the principles and processes that guide ethical sourcing, supplier engagement and risk management across our operations.
- (b) Our existing policies include:
 - (i) **Staff Code of Ethics and Conduct:** Our Code of Ethics and Conduct outlines our commitment to ethical behaviour. All personnel are required to adhere to these principles.
 - (ii) **Whistleblower Policy:** We encourage employees and suppliers to report any concerns regarding unethical behaviour or human rights violations without fear of punishment or adverse consequence. We ensure that these reports are taken seriously and investigated thoroughly.

The Asuria Whistleblower Policy encourages a culture where any officer, employee or contractor does not suffer detriment because of speaking up about potential misconduct concerns.

8. Enterprising Heart Statement

- (a) 'Enterprising Heart' defines the principles that integrate our company strategy with our individual actions.



- (b) What makes Asuria truly unique is that all our people are truly enterprising at heart. The Asuria culture drives a sense of innovation, excitement and passion in all programs and services we deliver.
- (c) At Asuria, our people are at the heart of all our services. We believe the success of services is in having every employee treat every citizen with empathy, dignity and respect.
- (d) While our staff are recruited from many diverse backgrounds, what is common to all is their willingness to drive new ideas and approaches, being imaginative, resourceful and adaptable to change and constantly striving for continuous improvement.
- (e) Our ability and desire to consistently innovate is demonstrated through our adaptation of the latest thinking in cognitive science and behavioural economics to ensure we focus on every citizen's strengths. We also license best-in-breed technology to ensure we deliver all our programs as efficiently and as effectively as possible.
- (f) With Asuria, you will always see a new approach to delivering human services. An approach that is focused on innovation and a growth mindset while being empathetic to the citizens you want to serve.
- (g) Asuria is a people business that beats to an Enterprising Heart.

9. Our actions taken to mitigate against modern slavery practices

- (a) We continue to implement a modern slavery framework to assist in addressing the modern slavery risks associated with our operations and supply chains.
- (b) During this reporting period, we strengthened our internal processes and supplier governance frameworks to support ongoing efforts to identify and mitigate modern slavery risks. These actions included:

Modern slavery policy and supplier code of conduct

A Modern Slavery Policy and a Supplier Code of Conduct were introduced, setting out our expectations of suppliers in relation to ethical conduct, labour standards, and transparency in supply chains.

Procurement policy and supplier risk assessment process

A modern slavery risk assessment guide was developed and implemented to assist staff in evaluating new suppliers. Completion of this assessment is now mandatory prior to engagement.

As part of our procurement processes, we have implemented frameworks to support ongoing monitoring of modern slavery risks in our supply chain. Where a supplier has been identified as having an elevated risk of modern slavery, actions to address or mitigate that risk are set out in our Procurement Policy and risk assessment process.

Supplier contract approval process

A revised procurement process was introduced, incorporating a four stage review for all new supplier contracts. As part of the review process:

- (i) all engagements with suppliers must be accompanied by a completed modern slavery risk assessment;
- (ii) where the supplier is rated medium or high risk, a modern slavery supplier questionnaire must also be completed;
- (iii) suppliers assessed as high risk are not approved for engagement;
- (iv) for suppliers assessed as medium risk, a supplier code of conduct is issued at the time of engagement.

Supplier contract reviews

- (i) Our quality and compliance team are responsible for reviewing all new supplier submissions for compliance with modern slavery requirements prior to approval.
- (ii) These measures reflect an ongoing commitment to improving internal processes and ensuring procurement decisions align with our obligations under the Act.

10. Focus areas for the next 12 months


- (a) Asuria continues to strengthen its approach to identifying and managing the risks of modern slavery across its operations and supply chains.
- (b) Our focus moving forward is on embedding these new policies and processes into day-to-day operations and using them to strengthen awareness within the company and improve supplier visibility. These are our focus areas for the next reporting period:
 - (i) supporting our staff to apply the modern slavery risk assessment and associated procurement processes.
 - (ii) ensuring supplier risk ratings are tracked and responded to in line with the review process now in place.
 - (iii) using the central contract repository and supplier approval checklist to support coordination across the teams.

- (iv) reviewing the effectiveness of these measures over time to identify gaps and opportunities for improvement.
- (c) This is an ongoing commitment to improve processes within our business and gain visibility into the risks of modern slavery in our operations and supply chains.

11. Consultation with our related entities and commitment from Asuria’s leadership team

- (a) We have undertaken meaningful consultation with out related entities to ensure a coordinated and consistent approach to identifying and addressing modern slavery risks across our operations and supply chains.
- (b) This Statement is made pursuant to section 13(1) of the Act.
- (c) It constitutes the statement of Asuria People Services Pty Ltd for the year ended 30 June 2025.

Our leadership team is committed to the fight against modern slavery and human trafficking. This Statement has been approved by the Board of Directors of Asuria People Services Pty Ltd and is signed by our CFO and CEO, reflecting our dedication to ethical practices and human rights.

Signed by:

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Ian David Brown
Chief Financial Officer

28 July 2025 | 4:42:05 PM AEST
Date signed

Signed by:

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Nicole Grainger-Marsh
Chief Executive Officer

29 July 2025 | 10:06:40 AM AEST
Date signed