

# MI-GSO|PCUBED Australia - Modern Slavery Statement - Financial Year 2021

## Introduction

This Modern Slavery Statement (**Statement**) has been published in accordance with the *Modern Slavery Act 2018* (Cth) (The **Act**). It sets out the steps Program Planning Professionals Pty Ltd t/a Pcuped Australia (**Pcuped Australia**) ACN 080 988 754 has and will take to address and prevent slavery and human trafficking from occurring in our business and our supply chain. This statement covers our financial year 2021 which ended on 31<sup>st</sup> December 2021.

We are committed to conducting our business in a manner that prevents modern slavery. We believe the risk of slavery and human trafficking in our business, management consulting, is relatively low, however we recognise that we must be proactive in our approach to assessing risk and we remain focused on reviewing and assessing our supply chain. We believe in continuous improvement, and in this our first statement, we set out the steps we have taken to embed due diligence which is appropriate to the risk.

## Our Organisation

### Our Structure

MI-GSO|PCUBED is a leading global management consulting services company dedicated to project, programme and portfolio management delivery to clients across the public and private sectors. With over 2500 employees globally, our Australian business has over 35 employees and is a trusted delivery partner of the most recognisable in brands in Defence, Energy, Transport, Financial Services, as well as government organisations.

We employ staff and contractors to deliver services to our clients and to conduct our business operations. Our Australian Headquarters is in Sydney, with offices in Canberra, Brisbane, Perth, Melbourne and Adelaide.

Pcuped Australia is a limited company incorporated in Australia in 1997. We are a wholly owned subsidiary of our parent company, Program Planning Professionals Ltd (t/as MI-GSO | PCUBED) incorporated and domiciled in the United Kingdom. Our ultimate holding company is ALTEN SA incorporated and domiciled in France. For more information about the company, please visit our website: <https://www.migso-pcuped.com/#home>

### Our Values

Pcuped Australia employee code of conduct is encapsulated in our values which are embedded into everything we do. Integrity is central to who we are. We strive to maintain the highest standards of employee conduct through the demonstration of these values:

#COMMITMENT	Moving forward together, we create, dare, try, we are committed as partners in success, we make all things possible.
#EXCELLENCE	We are driven by passion, we do not stand still, pushing the limits of performance every day in the pursuit of excellence.
#TEAM SPIRIT	This is more than a job. As a team, we help each other, share experiences, collaborate, and have fun together.

## Our Policies and Practices

### Our Corporate Social Responsibility

Our Corporate Social Responsibility Programme is structured around three core pillars each containing a portfolio of goals and projects. These pillars are **Deliver** (Deliver Green Together), **Reach** (Equality Diversity and Inclusion) and **Assure** (Wellbeing & Work from Anywhere).

We are proud to have very active communities around the globe that play a crucial role in enabling a better future. Our commitment to CSR goes beyond being a corporate priority and is embedded in our individual responsibilities.

MI-GSO|PCUBED, as part of the ALTEN Group of companies, integrates socially responsible behaviour into our organisations through the below charters and policies which are applicable to all employees in every country which the Group operates:

- **Sustainability Charter**- Through this [charter](#), Alten undertakes to promote a corporate social responsibility initiative within its companies. As well as the commitment to comply with the laws and rules of good governance, this initiative is based on the fundamental principles of fairness, valuing employees, protecting the environment and developing environmentally friendly service offerings. In this way, ALTEN Group intends to make an active contribution to sustainable development.
- **Responsible Purchasing Charter**- Our Group undertakes to respect the 10 principles of the Global Compact, the Universal Declaration of Human Rights of the United Nations, the various conventions of the International Labour Organisation and the OECD Guidelines for Multinational Enterprises. Our procurement policy and practices ensure fair treatment, independence, fight against misappropriation, transparency in choices and decisions, and ongoing improvement for mutual interest.
- **Anti-Corruption Code of Conduct** - the ALTEN Group has put Ethics at the heart of its [strategy](#) and is building its growth around two basic principles of integrity and transparency. The Code of Conduct sets out the Group's "Zero Tolerance Policy" on corruption and any act that undermines business integrity.
- **Ethics & Compliance Charter**- Our Group is built on a bedrock of fundamental [principles](#) of integrity and transparency. These principles are implemented by management and employees alike in order to establish lasting relations of trust with its employees, personnel representation bodies, clients, shareholders, suppliers, competitors and all of its partners.

To find out more information about our Corporate Social Responsibility, our labels & certifications, click [here](#).

In addition, we have related Australian policies which demonstrate our commitment to ethical practices in every aspect of our business:

- **Modern Slavery policy** We encourage all our colleagues, clients and other stakeholders to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our reporting procedure is designed to make it easy for colleagues to make disclosures, without fear of retaliation, and we thoroughly investigate any disclosures. To date, there have been no whistleblowing disclosures relating to modern slavery.

- **Anti-Corruption and Bribery Policy** – Our policy makes it clear that all our business must be conducted in an honest and ethical manner. We have a zero tolerance towards bribery & corruption, and we are committed in acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

All policies are available for our colleagues to access on our intranet site.

## Our Suppliers

We purchase goods and services from a variety of suppliers in Australia. We have identified the main categories of purchasing during the reporting period as:

- IT- Software & hardware
- Professional services (i.e., legal services, accounting)
- Office space

## Due Diligence & Risk Assessment

We consider that our supply chain presents a relatively low risk with regard to slavery and human trafficking. Nonetheless we audit our suppliers, and we are committed to work only with organisations who share our values and who are also committed to playing their part in the eradication of slavery and human trafficking. We review the controls which our suppliers have in place and require confirmation that they are committed and are taking action to prevent modern slavery and human trafficking.

We ask that the businesses in our supply chain, including the sub-contractors and service providers we work with, adhere to our expectations in respect of their workforce.

With regard to our own employees, our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm details of offers made. We have robust procedures in place for vetting of new employees, confirming identities and ensuring they are paid into an appropriate personal bank accounts. We also conduct right to work checks where candidates are migrant workers holding temporary working rights in Australia to ensure the person is a lawful resident of Australia and has valid working rights.

Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

## Our effectiveness in combating slavery and human trafficking

During 2021 there were no concerns reported to us via our Modern Slavery policy (or any other channels within M|P) relating to slavery and human trafficking or in relation to any sub-contractors, service providers or other companies with whom we partner.

The directors of M|P shall take responsibility for implementing this policy statement and shall provide adequate resources to ensure that slavery and human trafficking is not taking place within the organisation or our supply chain.

We will continue to monitor and review our policy. If we become aware of any breaches of our policy we will investigate and take such steps as are necessary to minimize the risk of any further breaches occurring.

## Our Commitment

We will continue to build capabilities and provide relevant training to ensure that our employees are well-informed to deal with the risk of modern slavery.

We will aim to work with our 3<sup>rd</sup> party suppliers in mitigating the modern slavery risks in our supply chain and taking appropriate remediation actions where required.

We will continuously realign and implement appropriate measures in line with government guidelines in reducing modern slavery risks in our business and supply chain.

## Approval and Signature

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) and constitutes our modern slavery statement for the financial year ending 31<sup>st</sup> December 2021.

This statement was approved by the Board of Directors of Program Planning Professionals Pty Ltd (t/as Pcuped Australia) in their capacity as principal governing body of Program Planning Professionals Pty Ltd. This statement will be reviewed annually and is signed by Brad Purdy, Director on behalf of Program Planning Professionals Pty Ltd (t/a Pcuped Australia).



Brad Purdy  
**Director & General Manager**  
**October 2022**