



Michael Page International (Australia) Pty Ltd  
**Modern Slavery Statement**





## Modern Slavery Statement

Michael Page International (Australia) Pty Ltd's (**Michael Page Australia**) purpose is to change lives through creating opportunity for people to reach their potential by bringing the world's best employers and the brightest professionals together. We do not tolerate, support or engage in acts of modern slavery and human trafficking occurring within our business and supply chain.

We expect our people, our suppliers, and their employees, whether permanent or temporary, to be treated with respect and dignity at work. At Michael Page Australia, we believe employment should always be chosen; there must be no forced, bonded, or involuntary labour. Employees must not be required to lodge monies or identity papers to be able to work and must be free to choose to leave employment.

This statement has been prepared by Michael Page Australia to meet the requirements of the *Modern Slavery Act 2018* (Cth). It covers the period 1 January to 31 December 2022 and explains the work we have undertaken to address modern slavery risks within our business since the 2021 reporting period and the steps we intend to take over the coming year.



## Background

Modern slavery is a global issue which can affect any business in any sector and is often very difficult to detect. We recognise, and take very seriously, the risk of modern slavery in our business and our people are committed to taking steps to reduce this risk within our business and supply chain.

## Our structure and operations

Michael Page International (Australia) Pty Ltd ACN 58 002 872 264 is an Australian Proprietary Company, limited by shares that specialises in recruitment consultancy in Australia. We have over 35 years of experience and approximately 279 employees in Australia, with annual revenue of approximately \$200 million.

PageGroup plc is the ultimate holding entity of Michael Page Australia. The PageGroup group of companies' trades under the core brands of PAGEGROUP, PAGE EXECUTIVE, MICHAEL PAGE, PAGE PERSONNEL and PAGE OUTSOURCING. Michael Page Australia does not own or control any other entity.

Our registered office is at Level 21, 9-13 Castlereagh Street, Sydney NSW 2000. We specialise in mid-to senior-level professional and management recruitment for permanent, temporary, and contract roles as well as for office and administrative workers for both the private and public sector.



## Our supply chains and risks of modern slavery practices

As an Australian provider of professional recruitment services, we consider our supply chain to be relatively simple in comparison to many other industries, as we are not directly involved in overseas labour or manufacturing.

We work with a small range of suppliers who provide goods and services across several different categories. We recognise there is risk of Michael Page Australia being indirectly linked to modern slavery, as our suppliers may source products or raw materials from overseas companies connected with modern slavery.

Michael Page Australia is focused on the recruitment of mid to senior level roles, rather than low skilled labour. As part of our business, we have direct control over the sourcing and supplying of temporary personnel to clients. We recognise that across Australia, temporary workers face higher risks of exploitation and may be more likely to be subject to modern slavery practices.

Our supply chain includes the third-party services provided to Michael Page Australia directly by supply of goods, facilities services, and professional services. We engage various Australian-based providers to provide cleaning, waste management and maintenance services to our Australian offices. While the labour provided by our suppliers is sourced in Australia, we recognise that cleaning, waste management and maintenance services are high risk sectors. By engaging these services through a third party we may be indirectly contributing to modern slavery practices.

In addition, products used by our suppliers may be sourced both in Australia and overseas. It is possible that some of our supplier's products, or their components, may be sourced from countries and industries where there is some risk of being linked with modern slavery.

Michael Page Australia considers there is a relatively low risk of causing, or contributing to, modern slavery in its operations and supply chains.



## Actions to assess and address the risks of modern slavery

We conduct risk assessments on our supply chains on an ongoing basis. At the time of preparing this statement, we consider there is a relatively low risk of labour exploitation or other forms of modern slavery and human trafficking occurring within it.

We are assessing and addressing the risk of modern slavery practices occurring within both our business and our supply chain by taking the following actions:



## Our policies

Since June 2022, all employees of Michael Page Australia have been required to comply with Michael Page Australia's new Modern Slavery Procedure. The Modern Slavery Procedure sets out, among other things, Michael Page Australia's methodology for managing modern slavery risks, including the implementation of a Modern Slavery Vendor Risk Assessment. The Modern Slavery Procedure assists Michael Page Australia to manage risks to workers in the supply chain and to ensure compliance with the Supplier Code of Conduct, applicable legislation and regulatory requirements, including those related to modern slavery and human trafficking.

Employees are also required to comply with the Employee Code of Conduct (**Employee Code**), which makes clear that Michael Page Australia will not tolerate, engage in, or support the use of forced labour.

Third parties, consultants and contractors who provide goods and services to or on behalf of the Michael Page Australia continue to be required to comply with our Supplier Code of Conduct (**Supplier Code**). The Supplier Code promotes our standards within the supply chain and reflects our commitment to acting ethically and with integrity in business dealings and relationships. We expect our suppliers to have processes in place to support meeting the standards set out the Supplier Code and to provide supporting evidence if requested.

Michael Page Australia encourages staff to speak up, is receptive to feedback from staff and customers, and is committed to continuous improvement. Michael Page's Speak Up (Whistleblowing) Policy assists in preventing modern slavery and human trafficking by providing our people with a mechanism to speak freely about our practices and raise any concerns.



## Due diligence

### Within our own business

Michael Page Australia prohibits the use of forced labour and human trafficking.

Michael Page Australia has in place several procedures to proactively manage risk, including robust recruitment processes in line with Australian employment laws. Michael Page Australia also provides an external confidential whistleblowing helpline which employees are encouraged to use to report any concerns.

In 2022, a primary focus of Michael Page Australia was strengthening due diligence within our own business. Key activities we have undertaken during the previous reporting period include:

- (a) conducted reviews of all relevant policies and procedures, including the Supplier Code of Conduct;
- (b) approved and circulated all relevant policies and procedures, including a new Modern Slavery Procedure;
- (c) promulgated avenues for customers and workers to report incidents and make whistleblowing complaints, including via Michael Page's Speak Up (Whistleblowing) Policy, Speak Up service (external provider for anonymous reporting) and complaints policy (website);
- (d) implemented an audit and monitoring program which incorporates modern slavery as part of our standard internal audit program;
- (e) conducted audits to verify controls and developing corrective action plans for any identified non-conformances;
- (f) followed our risk management procedure to ensure we are continually reviewing modern slavery risks within our operations and supply chain and undertaking further evaluation based on risk;
- (g) further implemented an incident management process;
- (h) delivered new and reviewed modern slavery awareness training which targets all key stakeholders and employees;
- (i) where required, included new modern slavery clauses in terms of business requiring suppliers of Michael Page Australia to identify, assess and address modern slavery practices and take action if a supplier becomes aware of any modern slavery practices in its operations or supply chain;
- (j) communicated the updated Modern Slavery Questionnaire (**Attachment 1**) to suppliers in line with their risk rating.

## Due diligence

Michael Page Australia is committed to its purpose of changing lives for people through creating opportunity to reach potential. It's not just about what we do, it's about how we do it. To this end, Michael Page Australia continues to take steps to ensure all staff receive employment entitlements in accordance with applicable industrial instruments and to provide safe working conditions which comply with Michael Page Australia's work health and safety obligations. This process includes assessing all sites for the safety, health and wellbeing of our workers.

In recognition of the risks associated with temporary workers, we continue to implement an additional system of checks and procedures which help to ensure temporary workers are protected from the risks of modern slavery. These checks and procedures include:

- (a) verifying temporary workers have a right to work in Australia for the duration of their assignment, by asking the individual to produce relevant identity documentation. A delay in providing proof of identity and/or associated right to work documentation might indicate a modern slavery issue and is escalated within the business as required;
- (b) conducting detailed reference checks to ensure individuals are hired in a role they are qualified to undertake;
- (c) conducting detailed background checks;
- (d) reviewing contracts to ensure they comply with all legal requirements regarding workers' rights;
- (e) ensuring temporary workers have a bank account in their own name into which their remuneration is paid; and
- (f) reviewing modern awards and industrial instruments to ensure temporary workers are paid correctly.

# Due diligence

## Within our supply chain

We are committed to partnering with suppliers that share our view and stance on modern slavery.

As part of our global initiative, we have undertaken the following due diligence procedures with respect to our suppliers:

- (a) incorporated a continuous review process into our Modern Slavery Procedure to evaluate modern slavery risks for new and any existing suppliers who have been identified as 'higher risk' in our initial review process;
- (b) provided training material to suppliers and partners on identifying modern slavery risks within their operations or supply chains;
- (c) assessed new suppliers within Australia, Asia Pacific and the United Kingdom who we believed operated in high-risk areas and wrote to each of them to express our commitment to transparency and combatting modern slavery within our business; ensuring they understood we have similar expectations for our suppliers;
- (d) provided all new and existing suppliers with our Modern Slavery Statement, Supplier Code of Conduct, Vendor Handbook and insurances, licenses and vendor terms;
- (e) requested confirmation from new and existing suppliers that they will adhere to our standards;
- (f) developed modern slavery clauses in terms of business requiring suppliers of Michael Page Australia to identify, assess and address modern slavery practices and take action if a supplier becomes aware of any modern slavery practices in its operations or supply chain; and
- (g) implemented a formal process for business consultation which requires consultation to occur at various times, including prior to a vendor contract being signed to identify high modern slavery risks.

Our approach facilitates the identification and assessment of potential risk areas in our supply chain in relation to modern slavery and human trafficking. We act to mitigate these risks through the implementation of effective actions, controls and risk mitigation strategies. We understand that identifying and mitigating existing risks in our operations and supply chain are ongoing activities and we continue to monitor and regularly review the effectiveness of our actions, controls and risk mitigation strategies to ensure that any emerging risks are identified.



## Audit and compliance

Michael Page Australia continues to evaluate the nature and extent of its exposure to the risk of modern slavery occurring in its business and supply chain. Specifically, on an ongoing basis, Michael Page Australia:

- (a) conducts internal audits and works with its local procurement teams to ensure the organisation has robust and effective processes; and
- (b) provides Board-level reporting on modern slavery risk and compliances.

Our core business is focused on the provision of recruitment services in respect of professionals, office and administrative workers, rather than the agriculture, retail or manufacturing sectors, which are sectors we perceive to present a higher risk of labour exploitation and modern slavery.



## Further steps

We intend to take the following steps in relation to modern slavery and human trafficking during the course of the 2023 reporting period:

- (a) tracking Michael Page Australia's modern slavery performance during the reporting period and factoring this in to localised audits where relevant;
- (b) reviewing our modern slavery awareness training to ensure it remains legally compliant, up-to-date and relevant;
- (c) considering the general risk profile of the procurement or supplier relating to modern slavery compliance before engaging or renewing an existing contract for a supplier, subcontractor or agent in the reporting period;
- (d) reassessing all suppliers to confirm if there are any changes in operations which will increase their risk score;
- (e) requiring any suppliers identified as 'high risk' to recomplete the Modern Slavery Questionnaire;
- (f) undertaking further action (for example, interviewing vendors/personnel to discuss responses, desktop assessment/training and/or supplier audits) to evaluate the potential risk of suppliers identified in the Modern Slavery Questionnaire as 'high risk' during the reporting period; and
- (g) consulting with global entities to understand due diligence for Global procurement impacting Michael Page Australia.



## Assessing the effectiveness of our actions

To assess the effectiveness of our actions we:

- (a) conduct external audits of our suppliers, to ensure compliance with the Supplier Code, identify any modern slavery risks and assess the effectiveness of the actions implemented to mitigate the risks of modern slavery;
- (b) conduct internal audits across our business to ensure our actions are implemented and effective;
- (c) identify changes to modern slavery risks and take steps to determine how risks are best addressed;
- (d) conduct annual senior management reviews at Board level to assess the actions we have taken to mitigate the risk of modern slavery;
- (e) keep a record of the actions taken by Michael Page Australia and suppliers in relation to modern slavery; and
- (f) track the percentage of our staff who have completed modern awareness training.

This statement is made pursuant to section 16 of the *Modern Slavery Act 2018* (Cth) and has been reviewed and approved by the Board of Michael Page Australia on 29 June 2023.

### MICHAEL PAGE INTERNATIONAL (AUSTRALIA) PTY LTD

**Sharmini Wainwright**  
Senior Managing Director  
29 June 2023

**David George**  
Senior Managing Director  
29 June 2023

## Formal Modern Slavery Questionnaire

PageGroup

Doc No: PG HR F096	Version: 1.0	Issue Date: 05/06/2022	Review Date: 05/06/2025	Proc. Ref: PG HR P008
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**Explanatory Note to Suppliers**

Under *Australia's Modern Slavery Act (Cth) 2018* ("Act"), certain Australian entities (including Commonwealth Government Entities) and foreign entities carrying on business in Australia are required to report annually on modern slavery risks in their operations and supply chains. PageGroup is responding by taking proactive measures to work closely with suppliers to identify modern slavery risks and to better target and prioritise its actions in responding to these risks. PageGroup is committed to ensuring our supply chains are not linked to modern slavery and to address and mitigating risks that are identified.

All suppliers within the PageGroup supply chains, must complete the Questionnaire in accordance with the Act reporting requirements and meets the PageGroup Code of Conduct.

Suppliers are asked to complete the Questionnaire honestly and with details (where possible). The Questionnaire is confidential and will not be shared outside of the PageGroup (and it related group of companies).

For further information on identifying and assessing modern slavery risks in supply chains and operations, can be found in here *Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities*.



**Sharmini Wainwright**  
Senior Managing Director  
PageGroup Australia

INITIAL ASSESSMENT <input type="checkbox"/>	2 YEAR RENEWAL ASSESSMENT <input type="checkbox"/>
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**CLIENT CONTACT DETAILS**

Supplier Name	Date Completed
Supplier ABN/ACN	Parent Company Name
Supplier Address	Country /Geographic Location
Type Product/Service	
Number of Workers Employed	Number of Perm workers
Number of workers hired by Labour agencies	Number of seasonal/contract workers
Name of Recruiters Used and Contact Information	Contact Information:
Name	Contact Information:
Are the Recruiters Licenced?	Details
Supplier Name Completing	Supplier Position

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## 1.0 Position Title, Duties, Qualifications, Pre employment Requirements and PPE

### DOES THE SUPPLIER AGREE TO THE FOLLOWING:

1. Supplier confirms that it has read the Company Supplier Code of Conduct, handbook agrees with its statement of requirements, and commits to comply with them	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2. Supplier confirms it must advise and seek approval from subcontracting any portion of the work to a 3 <sup>rd</sup> party without prior written knowledge and consent by MP	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3. Supplier will be responsible for implementing and monitoring improvements designed to achieve conformance with the Company Supplier Code of Conduct as identified by PageGroup	<input type="checkbox"/> Yes	<input type="checkbox"/> No

## 3.0 ASSESSMENT – Completed prior to placement

### GENERAL MODERN SLAVERY

Item	Question	Yes	No	Controls/Comment/ Description/Agreed Action(s)
1.1	Is your organisation subject to the Modern Slavery Act 2018 (Cth) or equivalent State / Territory or international legislation eg UK Modern Slavery Act 2015?	<input type="checkbox"/>	<input type="checkbox"/>	Describe:
1.2	If YES, have you submitted a Modern Slavery Statement or equivalent for the relevant reporting period under that legislation?	<input type="checkbox"/>	<input type="checkbox"/>	
1.3	Does your organisation have policies and processes to identify, investigate and remedy the risk and any instances of modern slavery within your organisation?  (e.g. Supplier Code of Conduct, Human Rights Policy, Whistleblowing Policy, Complaints Management System, Purchasing procedure which includes assessment of suppliers)	<input type="checkbox"/>	<input type="checkbox"/>	Describe:
1.4	Does your organisation have a person or team responsible for overseeing modern slavery risks that arise in relation to the goods/services that you delivery?	<input type="checkbox"/>	<input type="checkbox"/>	Describe: If yes, please describe the role and responsibility of that person/team.
1.5	Do you provide training to your employees on modern slavery risk – Identify, assess and respond?	<input type="checkbox"/>	<input type="checkbox"/>	Last Date Provided:
1.6	Has your organisation had any Audits for Modern Slavery/Supply Chain (social, ethical audits conducted)?	<input type="checkbox"/>	<input type="checkbox"/>	Please specify details of the audit, including: • whether it was an independent or internal audit • the date of each audit • locations the audit related to
1.7	Is your organisation certified with any responsible sourcing third party certification schemes including SMETA, ETI or other ISO standard?	<input type="checkbox"/>	<input type="checkbox"/>	Observe/Describe: Specify the dates and type of certification?

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## SUPPLY CHAIN MANAGEMENT

Item	Question	Yes	No	Controls/Comment/ Description/Agreed Action(s)
2.2	Have you mapped your supply chain and the level of associated modern slavery risk?	<input type="checkbox"/>	<input type="checkbox"/>	Describe:  <b>Select Visibility of Supply Chain</b>  <input type="checkbox"/> High: You have mapped the full supply chain for key products and services used by your organisation and have identified key suppliers at all levels of your supply chain.  <input type="checkbox"/> Moderate: You have identified major Tier One suppliers and have partially or fully mapped the supply chains for key products and services of your supply chain.  <input type="checkbox"/> Developing: You have identified major Tier One suppliers. You have very limited or no visibility of your supply chains below the Tier One level.
2.3	Does your organisation perform screening or due diligence checks of prospective suppliers to assess the risks of modern slavery or other human rights harms that may occur in its operations and supply chains?	<input type="checkbox"/>	<input type="checkbox"/>	If yes, please describe how your organisation performs this screening.  If no, does your organisation plan to introduce measures to screen prospective suppliers for modern slavery risks in future?
2.4	Does your organisation require your suppliers to conduct due diligence for modern slavery risks on their suppliers?	<input type="checkbox"/>	<input type="checkbox"/>	Describe:
2.5	Does your organisation or major suppliers operate or have operations in any countries identified as high risk for Modern Slavery, including: Bangladesh, China, Democratic Republic of Congo, Ethiopia, India, Myanmar, Nigeria, Pakistan, Russia, Thailand?	<input type="checkbox"/>	<input type="checkbox"/>	Describe: If yes, which countries?
2.5	Does your organisation produce or provide goods/services that are known to have a high Modern Slavery risk factor? For instance: agriculture; construction; electronics and electrical products; extractives/mining and basic metal production; fishing and aquaculture; forestry; healthcare; hospitality; housekeeping/facilities operations, textile and apparel manufacturing; transportation and warehousing security; security; cleaning; traffic control.	<input type="checkbox"/>	<input type="checkbox"/>	If yes, please describe what goods or services your organisation produces or provides?
2.6	Have you had any instances of known or suspected Modern Slavery in your supply chain, or claims or adverse media attention in relation to human rights practices within your supply chain?	<input type="checkbox"/>	<input type="checkbox"/>	If yes, please describe what action your organisation takes.

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## EMPLOYMENT STANDARDS

Item	Question	Yes	No	Controls/Comment/ Description/Agreed Action(s)
3.1	Are workers required to lodge any 'security deposits' (this could include financial or personal property) or pay any recruitment fees?	<input type="checkbox"/>	<input type="checkbox"/>	Describe:
3.2	Are any original identity related documents of workers (e.g. passports, birth certificates, national identity cards) retained?	<input type="checkbox"/>	<input type="checkbox"/>	If yes, please describe how your organisation performs this screening. If no, does your organisation plan to introduce measures to screen prospective suppliers for modern slavery risks in future?
3.3	Does your organisation deduct wages, impose monetary fines, and/or withhold pay or pay entitlements of workers?	<input type="checkbox"/>	<input type="checkbox"/>	Describe:
3.4	Are workers paid their legal pay entitlements (including superannuation), on time and provided with pay slips clearly showing how wages have been calculated and details of any tax or other deductions?	<input type="checkbox"/>	<input type="checkbox"/>	Describe: If not, please explain why not.
3.5	Do you have recruitment policies that ensure child labour is not being used?	<input type="checkbox"/>	<input type="checkbox"/>	Describe:
3.6	Are all workers provided with a written contract in a language they understand, where terms of employment including wage rates and hours of work are clear?	<input type="checkbox"/>	<input type="checkbox"/>	Describe: If not, please explain why not.
3.7	Where accommodation is provided to workers (for example, dormitories, hostels or other forms of shared accommodation), are regular checks conducted to ensure that the living conditions are adequate and meet legal requirements (for example, fire safety, space, temperature, lighting, sanitary facilities, privacy, ventilation)?	<input type="checkbox"/>	<input type="checkbox"/>	Describe: If not, please explain why not.
3.8	Where accommodation is provided, are workers free to leave at will?	<input type="checkbox"/>	<input type="checkbox"/>	Describe: If not, please explain why not.
3.9	Are workers free to lawfully resign their employment without restriction or penalty?	<input type="checkbox"/>	<input type="checkbox"/>	Describe: If not, please explain why not.
3.10	Do workers have a complaints mechanism to anonymously raise concerns related to labour conditions or workplace grievances and access appropriate remedy?	<input type="checkbox"/>	<input type="checkbox"/>	Describe: If yes please explain how you monitor and remedy concerns?
3.11	If yes, please describe how these mechanisms are monitored and remedy is provided?	<input type="checkbox"/>	<input type="checkbox"/>	If yes, please describe how your organisation performs this screening.

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Item	Question	Yes	No	Controls/Comment/ Description/Agreed Action(s)
				If no, does your organisation plan to introduce measures to screen prospective suppliers for modern slavery risks in future?

### 3.0 Risk Score – Office Use Only

**RISK SCORE**

Choose an item.

### 4.0 Action Plan

No	Identified Issue	Agreed Corrective Action	Agreed Completion Date	Who By	Entered in CAR <b>Compliance Team</b>
1					
2					
3					

### Risk Score Calculator

	CONSEQUENCES					RISK SCORE	RISK SCORE ACTION	
	Insignificant	Minor	Moderate	Major	Catastrophic			
LIKELIHOOD	Rare	2	3	4	5	6	9 - 10	<b>Extreme Risk</b> - Unacceptable Risk - Stop Work or process if possible and <b>introduce immediate</b> controls & monitor.
	Unlikely	3	4	5	6	7	8	
	Possible	4	5	6	7	8	7	<b>High Risk</b> - Generally (in most circumstances) not acceptable risk, must be rectified <b>as soon as possible</b> . Introduce controls as low as reasonably practicable & monitor. Management approval required.
	Likely	5	6	7	8	9	6	<b>Moderate Risk</b> - Generally (in most circumstances) acceptable risk. Actions required if risk not able to be managed to acceptable level, monitor tasks. Proposed activity can proceed.
	Almost Certain	6	7	8	9	10	5	
STEP 1: Determine the Risk Score (Consider the Likelihood and Consequence Score). Take the Likelihood column and select the correct column. Take the consequences rating and select the correct column and select the risk score.						4	<b>Low Risk</b> - Manage using normal work practices and monitor work to ensure risk remains low.	
STEP 2. Refer to Risk Score Action and using Risk Score, determine necessary action						3		
STEP 3. Determine the control measure in accordance with hierarchy of control - Elimination, Substitution, Isolation Engineering, Administration, Personal Protective Equipment						2		

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LIKELIHOOD/CONSEQUENCES: SCORES AND DEFINITION GUIDE		
Rating	Likelihood	Definition
E	Almost certain	Expected to occur in most circumstances
D	Likely	Probably occur in most circumstances
C	Possible	May occur at some time or occasionally
B	Unlikely	Could occur at some time
A	Rare	Occur only in exceptional circumstances
Rating	Consequence	Definition (People, Environment, Reputation, Financial)
5	Catastrophic	Fatality or incident resulting in long term impairment/permanent incapacity or inability to return to work. Reputational damage at a national level. Permanent significant & extensive environmental damage. Financial loss > \$500k
4	Major	Extensive injuries, hospitalisation and or a incident resulting in a lost time injury of 3 days or more. Reputational damage at a state level. An incident resulting in major permanent harm to the environment. Financial Loss \$100-500k
3	Moderate	A short term lost time incident (LTI) <3 days. Moderate reputational damage e.g. Regional Media coverage, multiple complaints. Moderate damage to the environment. Financial Loss \$20-100k
2	Minor	Medical Treatment Incident (MTI) A work injury requiring treatment by a medical practitioner, beyond the scope of normal first aid. Minor local reputational damage ie local papers. Minimal/short term harm to the local environment. Financial loss \$0-20k
1	Insignificant	First Aid Treatment or no treatment, No time off, no obvious environmental harm, minimal reputational damage, Financial loss \$0-5k