



THINKING PEOPLE

MODERN SLAVERY STATEMENT 2025



STATEMENT OVERVIEW

DFP is committed to ensuring that all individuals engaged by or through DFP are treated fairly, ethically and in compliance with legislative requirements.

According to the International Labour Organisation, there are more people in slavery today than any time in history. Compounding global challenges – the COVID-19 pandemic, ongoing armed conflicts, and climate change, have contributed to unprecedented disruption to employment and education in recent years, seeing increases in extreme poverty and unsafe migration, and upsurges in gender-based violence. All of which exacerbate the risk of all forms of modern slavery.

“The 2021 Global Estimates indicate there are 50 million people in situations of modern slavery on any given day, either forced to work against their will or in a marriage that they were forced into. This number translates to nearly one of every 150 people in the world.”

International Labour Organisation

The Australian Modern Slavery Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. The worst forms of child labour includes situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

DFP is committed to ensuring that all individuals engaged by or through DFP are treated fairly, ethically and in compliance with legislative requirements. DFP is committed to respecting fair labour practices and protecting work seekers from exploitation and modern slavery. As a member of the RCSA, DFP has made a professional commitment and is accountable for conducting business in a way that avoids causing or contributing to exploitation through its activities.

In line with this commitment, DFP has reviewed and updated its policies and procedures to explicitly address the standards outlined in the Modern Slavery Act 2018 (Cth) (Commonwealth Act), and has delivered Modern Slavery training to its internal employees. This work is underpinned by the DFP policies outlining the principles and conduct with which we expect our people to comply.

By ensuring that all employees, on-hired workers and clients comply with the principles and conduct expected of them, DFP can be confident that the risk of modern slavery occurring within our direct business operations is low. However, we recognise that DFP may be exposed to the risk of modern slavery through our supply network. DFP acknowledges its responsibility to prevent or mitigate the risk of exploitation linked to its operations, including its suppliers. In response, we conducted a Supplier Modern Slavery Risk Assessment to identify, prevent and mitigate actual and potential adverse modern slavery risks and impacts within our supply chains. Following this, we developed a platform to distribute online education for high-risk suppliers, of which a handful have accessed since its establishment.



REPORTING ENTITY

DFP employs approximately 100 permanent staff and approximately 1,000 casual or contract staff.

DFP Recruitment Services Pty Ltd as trustee for DFP Business Trust – a fixed unit trust - is a wholly-owned subsidiary of DFP Recruitment Holdings Pty Ltd. We do not own or control any other entities and are therefore not required to undertake a consultation process. The company employs approximately 100 permanent staff and approximately 1,000 casual or contract employees.

DFP provides services to clients based solely in Australia with the supply of labour in major regional centres or capital cities. We do not supply labour overseas. Our major categories of procurement include Human Resources, IT and Technology, Professional Services, Property and Travel.

Engaging thousands of people each year, we are committed to upholding human rights and fair labour practices and recognise the responsibility we have in the supply of skilled labour throughout the recruitment selection and placement cycle.

MODERN SLAVERY RISKS IN OUR OPERATION

DFP can be confident that the risk of Modern Slavery occurring within our direct business operations is low.

To understand the risk of modern slavery in our operation and supply chain, we assessed the potential for DFP to cause, contribute to or be directly linked to modern slavery. By ensuring that all employees, on-hired workers, and clients comply with the principles and conduct expected of them, DFP can be confident that the risk of modern slavery occurring within our direct business operations is low.

Modern slavery happens at the most extreme end of a spectrum that ranges from decent work to serious criminal exploitation.



MODERN SLAVERY

Worker cannot refuse or cease work because of coercion, threats or deception.
Worker may also be deprived of personal freedom.

DANGEROUS OR SUBSTANDARD WORKING CONDITIONS

Worker can refuse or cease work but doing so may lead to detriment. Worker is not paid fairly and does not receive some or all entitlements.
Worker may be required to work excessive hours.
Workplace is unsafe.

DECENT WORK

Workers' rights respected.
Worker free to refuse or cease work.
Worker paid fairly (at least the minimum wage).
Workplace is safe.

DFP has policies, procedures and practices in place which assist us in ensuring 'Decent Work' is provided and that exploitation of workers is identified and eliminated.

Our Employment Contracts and Terms of Assignment documentation as well as on-boarding documentation clearly identify conditions of employment, safety and complaints procedures. Conditions of employment are audited and assessed to be in line with the Australian National Employment Standards and the Modern Awards.

MODERN SLAVERY RISKS IN OUR OPERATION

“...our comprehensive people and human rights-focused policy suite supports DFP’s commitment to the eradication of modern slavery...”

The DFP Code of Conduct outlines our zero tolerance for discrimination, harassment, workplace violence, bullying, child and forced labour within our business, our supply networks, the businesses of our clients and their supply chains. The Code was updated in 2021 to explicitly outline our expectations in regards to exploitation and modern slavery, citing the types of practices that may lead to it, and our employees’ role in mitigating these risks and reporting such practices where identified.

Our Whistleblower Policy identifies modern slavery and provides further guidance to our people in relation to the behaviours we expect and outlines the mechanisms available for the reporting of behaviour or practices that are inconsistent with this.

In addition to the Policies mentioned above, our comprehensive people and human rights-focused policy suite is outlined below, supporting DFP’s commitment to the eradication of modern slavery.

- DFP OHS Commitment
- Code of Ethical Practice
- DFP Environmental Policy
- Discrimination, Harassment, EEO, Bullying and Violence Policy
- Flexible Work Arrangements Policy
- Leave Policy
- Workplace Diversity and Inclusion Policy
- Corporate Social Responsibility Policy
- Grievance Policy and Procedure
- Family and Domestic Violence Policy

The Code of Ethical Practice and Corporate Social Responsibility Policy reference expectations in regards to protecting workers from exploitation and modern slavery.

Further to our policies, procedures and employment documentation, in 2025, DFP continues to deliver a Modern Slavery e-learning module, included as part of our induction program for new staff.

While these measures allow DFP to be confident that we are not causing or contributing to modern slavery practices, we recognise that DFP may be linked to modern slavery practices through our supply network.



MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

We recognise that DFP may be linked to modern slavery through our supply network.

Within our supply chain, the following have been identified as the key indicators of Modern Slavery risks:

- Vulnerable populations – this includes new migrants, people living with disability and indigenous communities.
- Business models – models structured around high risk work practices or low wages.
- High risk product or service categories - either in clients we supply to or from whom we receive goods.

In 2024, DFP reviewed our areas of risk in the supply chain and several high-risk industry sectors remain a focus:

- IT and technology
- Commercial cleaning
- Property management

As a result of this review we expanded the list of suppliers to include the off-shore recruitment and travel industries.

Finally, we assessed the likelihood of the different categories of risk, as well as the current measures in place that mitigate that risk.

MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

We assessed the likelihood of the different categories of risk, as well as the current measures in place that mitigate that risk.

| Type of Exploitation | DFP Risk Area | Risk Level | Current Mitigation Measures |
|---|--|------------|--|
| Trafficking in Persons Slavery Servitude Forced Labour | <ul style="list-style-type: none"> Poor unsafe working conditions Excessive hours Restriction of movement Substandard accommodation Withholding identity and travel documents | Very Low | <p>Individuals are free to apply for work, free to turn down an offer of work and free to leave work at any time.</p> <p>Mature certified OHSMS fully implemented including workplace assessment prior to placing workers on sites.</p> <p>Identification papers not retained.</p> <p>Excessive hours report generated weekly, reviewed and managed for continued pattern.</p> <p>Modern Awards and interpretation rules applied as a minimum.</p> <p>Timesheets recorded.</p> <p>Detailed payslips provided.</p> <p>Payroll independently audited by external Accountancy firm.</p> <p>Direct and frequent contact with workers on third party worksites.</p> |
| Debt Bondage | <ul style="list-style-type: none"> Unauthorised payroll deductions, fees or debt recovery Underpayment of wages | Low | <p>We do not charge any fees to individuals for the sourcing of the employment opportunities they are offered.</p> |
| The Worst Forms of Child Labour | <ul style="list-style-type: none"> Underage employees | Very Low | <p>Photo identification is verified and we will not place anyone under the legal age of employment.</p> |
| Deceptive Recruiting for Labour or Services | <ul style="list-style-type: none"> Deceptive or coercive recruiting High risk industry x migrant or disadvantaged workers | Very Low | <p>Every worker is provided with a copy of the terms and conditions of their assignments including rates of pay, hours worked and entitlements. Employment Agreements are standardised for all workers in all sectors.</p> |



OUR APPROACH TO MANAGING MODERN SLAVERY RISKS

DFP OPERATIONS

DFP has reviewed its employment engagement documentation, policies, procedures, and Terms of Business and identified those that needed to be updated to directly address the risk of exploitation and modern slavery, and meet the standards outlined in the Modern Slavery Act 2018 (Cth) (Commonwealth Act). The documents identified were updated in 2021 and reviewed in 2024 to explicitly address the risks of modern slavery and exploitation.

This work is underpinned by the suite of DFP policies listed above, which outline the principles and conduct with which we expect our people to comply, and, where relevant, explicitly reference expectations relating to Modern Slavery. Furthermore, DFP adopts a continuous improvement model to all business processes and will continue to monitor and review our operations to ensure we optimise and improve our approach to Modern Slavery risks.

As well as ensuring the DFP policies and procedures are communicated, understood and complied with, we ensure that:

- All our legal obligations are complied with in the recruitment and onboarding process.
- We have a range of employment engagement methods depending on the needs of our stakeholders but in all cases, individuals are free to apply for work, free to turn down an offer of work and free to leave work at any time.
- We do not charge any fees to individuals for the sourcing of the employment opportunities they are offered.
- Our employment terms and conditions adhere to the legislation relevant to the jurisdiction in which we operate.
- Every single worker is provided with a copy of the terms and conditions of their assignments including rates of pay, hours worked and entitlements.
- We monitor via variance reports and scheduled verifications, excessive hours of work, pay rates, and safety metrics.
- We do not supply accommodation directly for our employees – however we do conduct risk assessments of host employers where accommodation is supplied through an employment arrangement.

- The results of these risk assessments are documented in our safety systems and our Candidate Relationship Management system. These audits are conducted prior to the initial placement of candidates and then every 12 months (or more frequently if applicable).
- Our Candidate Relationship Management systems have controls in place that prevent placements from occurring without the appropriate work rights and skills checks being completed. These controls are also used to manage the expiration of working rights and professional accreditations/memberships for continuing placements of staff.
- We provide ongoing training for our people within DFP who are responsible for sourcing and placing candidates and those in Human Resources related roles as well as our corporate teams responsible for sourcing. This includes an e-learning module on Modern Slavery, the National Employment Standards and Australian Modern Awards.

We have used available internal resources, external published sources and feedback from organisations, such as the International Labour Organisation, to inform our risk assessment approach.

SUPPLIER RISK ASSESSMENT AND DUE DILIGENCE

DFP is committed to working with our supply partners to identify where there may be risks of modern slavery practices in their operations and supply chains.

To effectively map our supply chain, we undertook a detailed review of our suppliers, their industry sector and our spend with them. As outlined above, DFP identified several high-risk industry sectors in our supply chain:

- IT and Technology
- Commercial cleaning
- Property management
- Travel
- Recruitment and Labour Hire

We determined a combination of industry risk and spend threshold was an appropriate approach which would capture both our biggest suppliers, and those who potentially present the highest modern slavery risk.



A key aspect of DFP's approach to managing modern slavery risks in our supply chain is to conduct regular Supplier Modern Slavery Risk Assessment Surveys to identify, prevent and mitigate actual and potential adverse modern slavery risks and impacts within our supply chains. Our first survey was issued to DFP's key suppliers in 2021 and continue to survey suppliers. These surveys request information relating to:

- How modern slavery risks are addressed in their organisation
- The level of visibility over their supply chain
- An assessment of the various types of modern slavery related risk in their organisation and supply chain
- The policies, processes and procedures in place to mitigate or respond to modern slavery related risks

In 2023, we reviewed our list of suppliers to ensure our designation of high-risk industries remained relevant in the context of our business operations. Following this review, we expanded the list of suppliers to include the recruitment and travel industries. Our Supplier Modern Slavery Risk Assessment Survey questions were reviewed to ensure it was up to date with current guidelines and best practice when assessing modern slavery risk.

The results of our Supplier Modern Slavery Risk Assessment survey form the basis of the following actions for our business:

- Gap analysis and continuous improvement of our existing controls.
- Designing and drafting enhancements (or new controls) to respond to identified risks in the form of documentation, policies, processes, training and amendments to contracts with our suppliers where appropriate.
- Designing new/enhanced risk controls as appropriate.
- Assessing the effectiveness of the actions we have taken to date.

In 2023, the risk assessment of survey responses triggered an action to design enhancements in the form of training for our suppliers who identified no existing plans to pursue training for their employees within a high-risk modern slavery environment. Subsequent surveys may trigger further actions.

In 2024, DFP developed a custom eLearning portal for suppliers to access upon request, offering this module to a handful of suppliers as a first choice for providing their staff with Modern Slavery Training.

In 2025, we will distribute another Modern Slavery Supplier Survey to maintain continuous identification, prevention and mitigation of actual and potential adverse modern slavery risks and impacts within our supply chains. Accompanying this, we will develop new policies and codes of conduct documentation that more clearly outline and address the risks of modern slavery and exploitation in our supply chain, with a focus on new supplier engagement.



ASSESSING EFFECTIVENESS

To assess the effectiveness of the actions it is taking to identify and address the risks of modern slavery practices within its operations and supply chains, DFP has:

- Reported on modern slavery risks and actions taken in leadership and executive meetings
- Delivered ongoing formal training in the correct application of Modern Awards and their relevance to the issue of labour hire.

By the end of 2025, DFP will:

- Distribute another Modern Slavery Supplier Survey
- Continue to report on DFP's Modern Slavery training KPI in executive meetings
- Develop further policies and procedures aiming to mitigate modern slavery risk in suppliers
- Deliver ongoing formal training in the correct application of Modern Awards and their relevance to the issue of labour hire.
- Introduce Modern Slavery training for our casual on hired workforce

CONTINUOUS IMPROVEMENT

DFP Modern Slavery Framework

Established in 2020, the DFP Modern Slavery Framework guides our ongoing commitment to addressing modern slavery risks. Initially it included the following:

- Modern Slavery Training
- Modern Slavery Statement

Ongoing Developments & Continuous Improvement

Policy & Governance

- Incorporation of explicit expectations relating to Modern Slavery risks in relevant policies
- Regular revision of policies and procedures
- Integration of modern slavery requirements into procurement and recruitment processes
- Continued monitoring and reporting to DFP Executive

Training & Monitoring

- Ensured all existing DFP staff complete the Modern Slavery training, as part of the induction training for all new starters
- Reported completion of Modern Slavery module to DFP Executive
- Delivery of Modern Awards training to all staff maximising fair and transparent pay for workers
- Introduction of Modern Slavery training to on-hired workers
- Ongoing surveying and monitoring of workers and client sites and conditions

Supplier Engagement & Risk Assessment

- Development of Client and Supplier Modern Slavery Risk Assessments
- Distributed a Modern Slavery Supplier Risk Survey to a reviewed list of high-risk suppliers
- Biannual distribution and assessment of Modern Slavery Supplier Risk Surveys with responses reviewed and actioned
- Creation of a custom eLearning portal for suppliers to access and complete the Modern Slavery learning module
- Provided access to Modern Slavery e-learn modules to suppliers to support the supply chain to educate their workforce and leadership teams

Future Focus

In our next reporting period, DFP will focus on reducing any potential Modern Slavery risks by improving and expanding our engagement with and understanding of our suppliers and their supply chains with regards to human rights and modern slavery including a revised Modern Slavery Supplier Survey and the evaluation of the Supplier Risk Assessment Survey responses; the development of a Modern Slavery Code of Conduct to be included in processes surrounding new suppliers with explicit reference to complying with Modern Slavery laws, and remedial actions DFP will take in the event of non-compliance.

APPROVAL

This statement was approved by the Board of Directors for DFP Recruitment Services Pty Ltd ATF DFP Business Trust.



Kate Coath
Chief Executive Officer
DFP Recruitment
11th September 2025



Koji Sugai
Director, Compliance & Risk Management
WILL Group

22 / 09 / 2025
Date