



P-0117.1 ASG Modern Slavery Statement

Overview

This document is Ashley Services Group's first annual Modern Slavery Statement, covering the period 1 July 2019 and 30 June 2020.

What is Modern Slavery?

Modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

The Australian Government estimates that there are approximately 1500 victims of modern slavery in Australia at any time. The United Nations estimates that at least 40 million people around the globe are in modern-day slavery. Those most at risk include women and children who may have little or no capacity to protect themselves.

Australia has agreed with the United Nations to attempt to abolish modern slavery by 2030.

Serious exploitation

There are eight types of serious exploitation which combined make up modern slavery:

1. Trafficking in persons – the recruitment, harbouring and movement of a person for exploitation through modern slavery.
2. Slavery - situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
3. Servitude – situations where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their workplace.
4. Forced marriage – situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the marriage ceremony's nature and effect.
5. Forced labour - situations where victims are either not free to stop work or not free to leave their workplace.



P-0117.1 ASG Modern Slavery Statement

6. Debt bondage – situations, where the victim's services are pledged as security for a debt and the debt is manifestly excessive of the victims' services are not applied to liquidate the debt or the services' length and nature are not limited and defined.
7. Deceptive recruiting for labour or services - situations where the victim is deceived about whether they will be exploited through a type of modern slavery.
8. Serious exploitation of children and child labour – situations including enslavement, sexual exploitation, used to produce or traffic drugs or exposure to dangerous work. (the "worst forms").

Freedom from slavery is a fundamental human right. Under the Australian Government endorsed by the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles), entities have a responsibility to respect human rights in their operations and supply chains. This responsibility includes taking action to prevent, mitigate and, where appropriate, remedy modern slavery in your entity's operations and supply chains.

Other illegal and harmful practices may be present within the supply chain but are not considered modern slavery. Practices like substandard working conditions or underpayment of workers may indicate more severe exploitation, corruption, and practices that impact human rights.

Modern Slavery Act 2018

The Australian Government's Modern Slavery Act 2018 (the Act) came into force on 1 January 2019. The Act establishes a mandatory reporting regime for entities:

- with consolidated revenue of at least A \$100 million in the reporting period, and
- who is either an Australian entity or a foreign entity carrying on business in Australia.

The Act requires reporting of an Annual Modern Slavery Statement. The Statement must identify and address the risks of modern slavery in Ashley Services Group's operations and supply chains and actions taken to address those risks.



P-0117.1 ASG Modern Slavery Statement

Mandatory Requirements

There are seven mandatory criteria required to be addressed in the Statement:

1. Identify the reporting entity.
2. Describe the reporting entity's structure, operations, and supply chains.
3. Describe the risks of modern slavery practices in the reporting entity's operations and supply chains and any entities it owns or controls.
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.
5. Describe how the reporting entity assesses the effectiveness of these actions.
6. Describe the consultation process with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the Statement).
7. Any other relevant information.

Reporting period 2019-20 and timelines

The first Australian Government Modern Slavery Statement covers the 2019-20 Australian financial year (reporting period). Statements from entities were initially due to be published before 31 December 2020; however, because of COVID-19, the first reporting period has been extended to 31 March 2021.

Ashley Services Group Modern Slavery Statement

Reporting Period 1 July 2019 – 30 June 2020

Identification

Identify the reporting entity.

Ashley Services Group is an integrated Labour Hire, Recruitment and Training organisation delivering quality workforce management and business improvement solutions across Australia since 1968. It is a preferred partner for custom human resource solutions with leading blue-chip organisations, not-for-profits, SMEs, and government departments.



P-0117.1 ASG Modern Slavery Statement

Ashley Services Group Pty Ltd is publicly listed on the Australian Stock Exchange.

Structure

Describe the reporting entity's structure, operations, and supply chains.

General Structure

The Corporate Governance Framework for Ashley Services Group is approved by the Board of Directors and set out in several key documents and policies.

Board

The Ashley Services Group Board consists of;

- Chairperson,
- Managing Director, and
- Executive Director.

The Board's role is to oversee the management of the Group and provide strategic guidance. A Board Charter is available on the Group Website, formally setting out the Board's functions and responsibilities, with the objective of the Board being able to perform its role more effectively. This creates a system of checks and balances to provide a balance of authority.

Executive Committee

The Executive Committee consists of;

- Managing Director,
- Chief Financial Officer, and
- Chief Operating Officer – Recruitment & Labour Hire.

Operational and Service Areas

- Training,
- Recruitment, and
- Labour hire

Australian Business Number

92 094 747 510

Owned/Controlled Entities

Owned/Controlled Entities

- Ashley Services Group Ltd
- Ashley Institute of Training
- Australian Institute of Vocational Development



P-0117.1 ASG Modern Slavery Statement

- Integracom Pty Ltd
- Action Workforce Pty Ltd
- ADV Services Pty Ltd
- Advance Recruitments Pty Ltd
- ASG Container Services Pty Ltd
- ASG Electrical Contracting Pty Ltd
- Action Job Support Pty Ltd
- One Force Recruitment Pty Ltd
- The Blackadder Recruitment Company Pty Ltd
- Concept Engineering Pty Ltd
- Concept Employment Pty Ltd
- Concept Recruitment Specialists Pty Ltd
- National Institute of Training Pty Ltd (RTO 90804)
- Ash Pty Ltd RTO 20749
- Vocational Training Australia RTO 90804
- Tracmin RTO 02106
- ASG Integracom Pty Ltd RTO 51534
- Track Safety Australia Pty Ltd
- The Instruction Company Pty Ltd
- Concept Retail Solutions Pty Ltd
- Construction Contract Labour (VIC) Pty Ltd
- Complete Traffic Services (Vic) Pty Ltd
- Vic Traffic and Labour Solutions Pty Ltd

Registered office and locations

Head Office Level 10, 92 Pitt St Sydney, NSW 2000

Operations Office 11 Holbeche, Arndell Park NSW 2148

Branch Offices in Laverton North in Melbourne, Underwood in Brisbane, and Fulham in Adelaide.

Operations

Describe the risks of modern slavery practices in the reporting entity's operations and supply chains and any entities it owns or controls.

Primary Role

Partnering with clients providing outsourced support and services through long term relationships by gaining a thorough understanding of their business requirements and cultural fit.



P-0117.1 ASG Modern Slavery Statement

Training

Through several leading Registered Training Organisations (RTO), Ashley Services Group provides nationally accredited qualifications, developed, and delivered to the Standards for National VET Regulation (SNVR) under the Australian Skills Quality Framework (ASQA), assuring the highest quality training and assessment services.

Recruitment

Ashley Services Group offers white-collar recruitment services (permanent, temporary and contract placements) through multi-specialist provider Concept Recruitment Specialists in partnership with The Blackadder Recruitment Company. The latter provides comprehensive recruitment services to the government sector. Concept Recruitment Specialists employ a dedicated and experienced team of consultants from various industries to recruit entry-level through to senior management positions.

Labour Hire

Ashley Services Group provides a combined labour hire and training model that meets their clients' changing requirements, provides site-specific solutions, and incorporates training to achieve a cost-effective outcome.

This is done through a large pool of inducted and available candidates able to start work within one hour of request and via a 24/7 year-round national operation with dedicated after-hours in-house consultants. The labour-hire division offers innovative, flexible, cost-effective labour-hire and workforce solutions.

Employees and Representatives.

257 Staff National and Casual employees:

NSW	1 657
QLD	483
VIC	1 531
NSW	665
TOTAL	4336

There are no representatives.

Countries of Operation

There are no overseas operations.



P-0117.1 ASG Modern Slavery Statement

Investments

There are no significant investments.

Stakeholders

Ashley Services Group stakeholders include, but are not limited to:

- our client community,
- Federal, State and Territory governments and their agencies,
- our providers and partners,
- our shareholders,
- our employees and partners,
- our associates, and
- the Australian community

Supply Chains

Ashley Services Group supply chains are within a range of suppliers and specialist located within Australia. These cover the expertise required to provide support to our clients and customers.

All suppliers to Ashley Services Group are required to comply with any laws, statutes, regulations, bylaws, ordinances, or subordinate legislation in force from time to time, including but not limited to the:

- Crimes Act 1914
- Criminal Code Act 1995
- Disability Discrimination Act 1992
- Freedom of Information Act 1982
- Environment Protection and Biodiversity Conservation Act 1999
- Privacy Act 1988
- Fair Work Act Cth (2009)
- Racial Discrimination Act 1975
- Safety, Rehabilitation and Compensation Act 1988
- Sex Discrimination Act 1984
- Trade Practices Act 1974
- Workplace Gender Equality Act 2012
- Work Health and Safety Act 2011
- Australian Capital Territory – Discrimination Act 1991
- New South Wales – Anti-Discrimination Act 1977
- Northern Territory – Anti-Discrimination Act 1996
- Queensland – Anti-Discrimination Act 1991



P-0117.1 ASG Modern Slavery Statement

- South Australia – Equal Opportunity Act 1984
- Tasmania – Anti-Discrimination Act 1998
- Victoria – Equal Opportunity Act 2010
- Western Australia – Equal Opportunity Act 1984.
- Modern Slavery Act 2018
- Corporations Act 2001 (Cth)

Statutes and other regulations

All safety, legal and other legislative requirements applicable to the client's workplace are identified by consulting with them. Pertinent information is retained in the client file for future reference.

A list of relevant legislation, regulations, codes of practice and standards pertinent to the Group are maintained on a Register. All Standards, Codes of Practice and legislation/regulations that apply to the Group's operations are registered with Quality House Watch to ensure the Company is advised whenever they are changed.

The list below is indicative;

New South Wales:

- Industrial Relations NSW, <https://industrialrelations.nsw.gov.au/>
- SafeWork NSW, <https://www.safework.nsw.gov.au> 131050
- Icare Workers Insurance, NSW, <https://www.icare.nsw.gov.au>
- State Insurance Regulatory Authority (SIRA), NSW, <https://www.sira.nsw.gov.au>,
- Commonwealth, National Occupational Licensing Authority www.nola.gov.au
- Office of Environment and www.environment.nsw.gov.au
- NSW Government Portal at www.legislation.nsw.gov.au

Victoria:

- Fairwork Ombudsman www.fairwork.gov.au
- WorkSafe, Victoria, WorkSafe Victoria, <http://www.worksafe.vic.gov.au>
- National Occupational Licensing Authority www.nola.gov.au.



P-0117.1 ASG Modern Slavery Statement

- Victoria Online at <http://vic.gov.au/>
- Environmental Protection Authority <http://www.epa.vic.gov.au>
- Department of Sustainability and Environment, <http://www.dse.vic.gov.au>
- Greater Dandenong Council, <http://greaterdandenong.com/>

Queensland:

- Wageline, <http://www.wageline.qld.gov.au/>
- Work Cover Queensland, <http://www.workcover.qld.gov.au/>
- National Occupational Licensing Authority www.nola.gov.au
- Queensland Government website at <http://www.qld.gov.au/>
- Department of Environment and Heritage Protection www.ehp.qld.gov.au
- Brisbane City Council, <http://www.brisbane.qld.gov.au/>,
- Townsville City Council, <http://www.townsville.qld.gov.au/>,

South Australia:

- South Australia, RTW SA, www.rtwsa.com
- National Occupational Licensing Authority www.nola.gov.au
- SafeWork SA, www.safework.gov.sa.au
- SA Central at <http://www.sa.gov.au>
- SafeWork SA, www.safework.gov.sa.au
- Environment Protection Authority, www.epa.sa.gov.au,
- Department of Environment, Water and Natural Resources www.environment.sa.gov.au
- WorkCover Corporation, www.workcover.com



P-0117.1 ASG Modern Slavery Statement

Western Australia:

- WorkSafe WA Commission, www.safetyline.wa.gov.au
- Work Cover WA, www.workcover.wa.gov.au/
- Commonwealth Workers Compensation, www.docep.wa.gov.au
- Western Australia Government website at <http://www.legislation.wa.gov.au>
- Environment Protection Authority of WA www.epa.wa.gov.au/
- Department of Commerce WA, www.docep.wa.gov.au
- WA Department of Environment & Conservation www.dsd.wa.gov.au/6743.aspx

Major Suppliers

Ashley Services Group major suppliers provide services that are listed in the table below. These provide long term and stable supply to enable the organisation to achieve its objectives. None of the suppliers are based outside of Australia.

Adcal Security Services Pty Ltd	Security
Asic	Corporate
Australis Group	Medical Centres NSW
Aztec Office National	Stationery
Blue Nrg Electricity	Electricity
Bridge Clinic	Medical
Business Fuel Cards Pty Ltd	Fuel Cards
CGU Workers Compensation (Vic)	Workcover Vic
CGU Workers Compensation (WA)	Workcover WA
CGU Workers Compensation (Act)	Workcover Act
CGU Workers Compensation (NT)	Workcover NT
Chubb Fire & Security Pty Ltd	Security
Craig Gordon	Training
CVA Property Consultants Pty Ltd	Corporate
D-Bit Australia Pty Ltd	Payroll
Dena & Lingard Family Trust Partnership	Corporate
DHL Supply Chain (Australia) Pty Ltd	Corporate
EML Workers Compensation (NSW)	Workcover NSW
Evision Pty Ltd	Payroll



P-0117.1 ASG Modern Slavery Statement

Flexible Training Solutions Pty Ltd	Training
Gallagher Bassett (SA)	SA WC Claims Agent
Gallagher Bassett (Vic)	Vic WC Claims Agent
Go Workplace Training	Training
GIO Worker's Compensation	Workcover NSW
Grace Records Management	Storage
Houseproud Cleaning	Cleaning
Icare Workers Compensation (NSW)	Workcover NSW
Initial Hygiene - Qld	Cleaning
Integrity Sampling (Nsw) Pty Ltd	Medical
Iron Mountain	Storage
Jani-King (Vic) Pty Ltd	Cleaning
Jj Richards & Sons - Arndell Park	Waste
JLB Management Consultancy Pty	Consultancy
Jobfit Health Group Pty Ltd	Medical
Jxt Australia Pty Ltd	Corporate
Houseproud Cleaning	Cleaning
KB Safety Supplies	Uniforms
Keating Lehn Solicitors	Corporate
Kildare Road Medical Centre	Medical
Lapen Pty Ltd	Rent
Mail Plus Blacktown	Corporate
Makesure Consulting Pty Ltd	Police Checks
Met West Milk & Singh Foods Pty	Milk
Mmgs Softnet Pty Ltd	It
National Crime Check	Police Checks
Neverfail Springwater	Water
O'herns Road Medical Centre	Medical
Onsite Diagnostics P/L	Medical
Orchid Avenue Realty Pty Ltd	Rent
Paspalis Investments Pty Ltd	Rent
Platinum Electricians	Electrician
Puroclean Property Services Pty Ltd	Cleaning
Qantas	Travel
Remondis Australia Pty Ltd	Waste
Rentokil Pest Control	Pest Control
Resilium Insurance	Insurance
Return To Work Sa	Workcover Sa
Rinmax Services	Cleaning
Safeman Australia Pty Ltd	Uniforms
Seek Limited	Advertising
Shixian Wu & Hui Lin	Cleaning



P-0117.1 ASG Modern Slavery Statement

Sonic Healthplus Pty Ltd	Medical
Suez Recycling & Recovery	Waste
Telstra Corporation Ltd	Communication
TNT Express	Transport
Total Office National	Stationery
TQCSI	ISO Auditing
Virgin Airlines	Transport
Waterlogic	Water
Workplace Advisory Group	Corporate
Workcover Qld	Workcover Qld

Risks

Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.

Ashley Services Group's operations and supply chains fall across many industries and sectors but are limited to Australian-based operations. All suppliers must submit compliance statements; then evaluated by the Group on a five-point scale that includes modern slavery criteria. All risk assessments and analyses are consolidated into an automated reporting system. Regular and periodic management reviews are conducted and acted upon at the highest levels of management in the Group.

Risks and opportunities are overseen and driven at the Board level through group responsibilities as a public company and at Head Office and each Branch at an operational level. They are often managed informally and monitored through monthly meetings; others are more formally organised through JLB Track and AW Track - automated tracking systems and handled expeditiously.

The risk assessment methodology is based on a Likelihood (5 criteria) x Consequence (5 measures) matrix resulting in five score levels. The same matrix applies to all risk assessments and is programmed into the JLB Track and AW Track systems.

Key indicators considered in assessing supplier risk are;

- Sector and industry risk
- product and service risk
- geographic risk, and
- entity risk.

Control and mitigation measures are anchored on;

- degree caused by the Group itself
- risk contributor to fight the Group, and
- risks linked to the Group.



P-0117.1 ASG Modern Slavery Statement

In a mature environment of established risk management and practice, calibrated to modern slavery provisions, in a wholly domestic context, it is unlikely that the currently known supply chain has risks that meet the threshold for serious exploitation as defined by the Modern Slavery Act 2018. Consequently, the risk is assessed as low. Nonetheless, Ashley Services Group understands that;

- There is a possibility that presently assessed contracts and supply chains may develop links to modern slavery further down the supply chain where they are outside of the Group's visibility and control.
- The Group also understands that our visibility of practices in our complete downstream supply chain may be limited in sourcing some goods.
- We also acknowledge that modern slavery risks may alter over time, requiring us to be attuned to broader developments.

However, as detailed above, we believe we have a very comprehensive and systemic approach towards doing everything possible to eliminate modern slavery risks and practices.

If at any time the Group becomes aware of Modern Slavery practices in the operations and supply chains used in the performance of the contract, it will ensure that the Supplier must as soon as reasonably practicable take all reasonable action to address or remove these practices, including where relevant by addressing any practices of other entities in its supply chains.

Controls

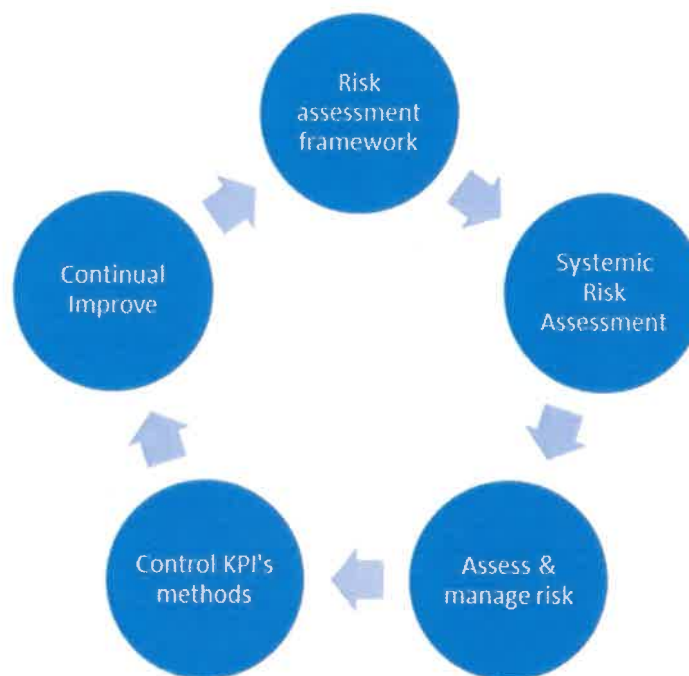
Ashley Services Group conducts the following to identify and control the risk;

- Scope and determine the Group's structure, businesses and supply chains utilising the existing risk assessment methodology.
- Formulate policies and procedures concerning modern slavery; including but not limited to;
 - collating current policies,
 - identifying gaps,
 - adapting existing policies and
 - formulating new policies as required.
- Systemic risk assessment – highlighting business operations and supply chains where there is a risk of modern slavery taking place;
- Assessing and managing identified risks – i.e., carrying out further due diligence in group operations and supply chains and reviewing and adapting contract terms and codes of conduct with suppliers;



P-0117.1 ASG Modern Slavery Statement

- Establishing processes and KPIs to monitor the effectiveness of the steps taken to ensure that modern slavery is not taking place in the business or supply chains.
- Implementing remedial steps where modern slavery is identified.



Evaluation

Describe how the reporting entity assesses the effectiveness of these actions.

Incorporating specific processes and checklists to assess and address risks is a long-standing custom and practice of the Group. However, the inclusion of modern slavery is a relatively new undertaking. To evaluate these processes' effectiveness, we have undertaken a phased strategy for the entire procurement life cycle.

Consolidate: Ashley Services Group will address the risks of modern slavery practices in its operations and supply chains through strict procurement and operational procedures, in line with legislation and procurement guidelines and policy.

Awareness: To assist with the identification of additional risks, all appropriate staff will complete awareness training. This training, produced by the Australian Government



P-0117.1 ASG Modern Slavery Statement

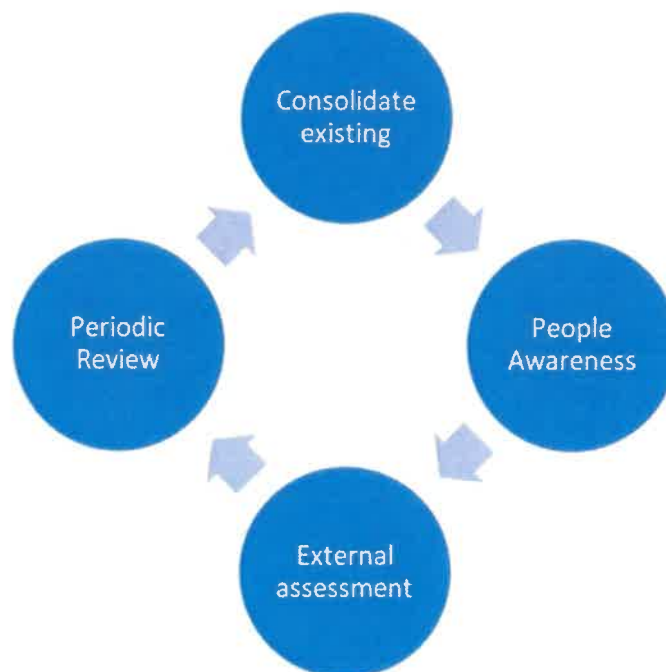
Addressing Modern Slavery in Government Supply Chains toolkit), will assist in addressing modern slavery Risks by educating staff on:

- what modern slavery is,
- what modern slavery looks like in supply chains,
- what we can do to address modern slavery risks further, and
- how to report concerns about modern slavery practices.

External Assessment: The Group will gain external audit/certification in;

- Human Resources Compliance Code (TQCSI)
- ISO 20400 Compliance certification

Conduct Periodic reporting and review to the Board and executive: The organisation will ensure that a continuous improvement lens is retained throughout the entire process. This will build on the organisation's already extensive suite of external certifications.





P-0117.1 ASG Modern Slavery Statement

Consultation

Describe how the reporting entity consulted on its Statement with any entities it owns or controls.

The Ashley Services Group undertook a risk-based approach to consultation with owned or controlled entities to prepare this Statement. We launched targeted consultation enabled by our centralised risk/assurance/quality system. The Group operates under a consolidated quality assurance and quality improvement framework. Therefore, extensive consultation and integration of this Statement were conducted through an effective and transparent system. This ensures that there is no deviation across the Group in any of its subordinate entities.

In addition, comprehensive ISO certifications are in place, ensuring that an integrated management system operating style is in place. A full-time manager is dedicated to the maintenance of the system, which presently includes;

- ISO 9001
- ISO 14001
- ISO 45001

This is being expanded to provide an even sharper focus on Modern Slavery and will include;

- The TQCSI Human Resources Compliance Code
- ISO 20400 Sustainable Procurement Certificate of Conformity

Any other relevant information

The Ashley Services Group treats its Modern Slavery responsibilities very seriously. The Group's approach has been one of; fully understanding the risk dimensions, implementing comprehensive policies and procedures, operating in a mature and systemic risk assessment and control environment, and seeking external certifications to ensure third-party scrutiny of our operations. We consider this to be a constant work in progress. Our policies and procedures and procurement instruments are constantly under review, and we are undertaking an ongoing program of awareness and capability training and development.

Approved and Endorsed by the Board

Managing Director: Ross Shrimpton

Signed by the Managing Director: _____

Date: 19/4/21