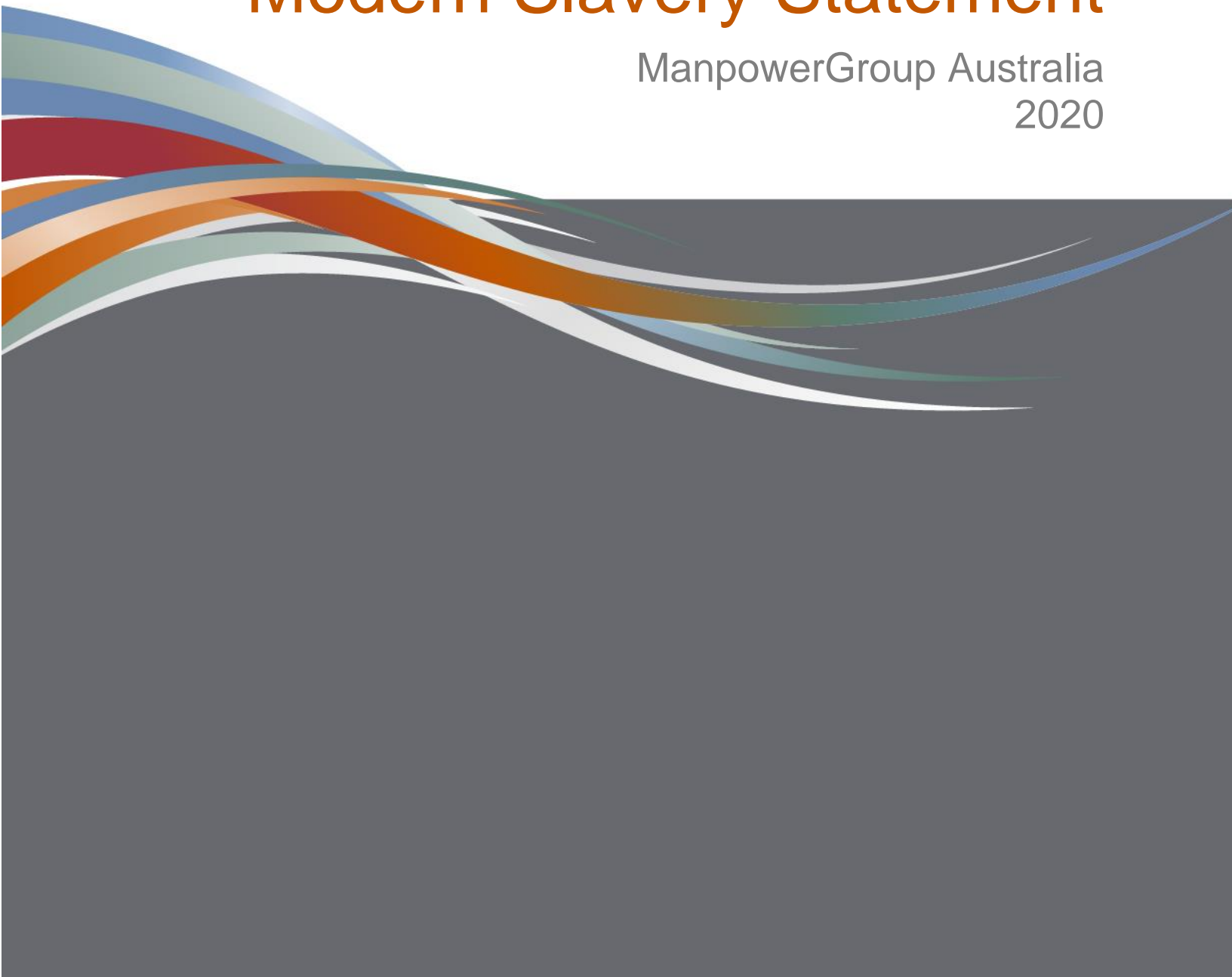




ManpowerGroup®

Modern Slavery Statement

ManpowerGroup Australia
2020



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1. Reporting Entities

This Modern Slavery Statement is made on behalf of ManpowerGroup Australia for our initial reporting period to 31 December 2020. It is a joint statement covering the following entities that together are known as ManpowerGroup Australia:

Manpower Services (Australia) Pty Ltd ABN 15 071 884 994 (henceforth Manpower)

Experis Australia Pty Ltd ABN 57 071 352 031 (henceforth Experis)

Right Management Consultants Pty Ltd ABN 82 006 132 163 (henceforth Right Management)

Manpower Services and Right Management are both wholly owned subsidiaries of ManpowerGroup Inc, our parent company based in Milwaukee, Wisconsin, US.

Experis is owned by Manpower. It was known as Greythorn Pty Ltd during the reporting period covered by this statement and renamed Experis Australia Pty Ltd in January 2021.

Both Manpower and Experis are reporting entities under the Modern Slavery Act. Right Management is reporting on a voluntary basis. Each entity is covered by ManpowerGroup Australia's centralised governance and management systems.

Number of employees at 31 December 2020:

Manpower – 565, Experis – 33, Right – 113. Number of on hired workers engaged during 2020 is approximately 1700.

Statement from Richard Fischer, Managing Director Manpower and Experis, and Tim Roche, Country Manager Right Management



Richard Fischer
Managing Director
Manpower and
Experis



Tim Roche
Country Manager
Right Management

ManpowerGroup has a deep heritage of operating at the highest level of integrity. Conducting business in an ethical and responsible manner is a key reason why we were named to the Ethisphere Institute's list of the World's Most Ethical Companies for the last 12 consecutive years and also named one of Fortune Magazine's most admired companies. Our corporate governance practices are intended to ensure principled goal setting, effective decision-making, management accountability, and appropriate monitoring of compliance and performance.

The Vision of ManpowerGroup is to lead in the creation and delivery of innovative workforce solutions and services that enable our clients to win in the changing world of work. For more than 70 years we have operated on the belief that meaningful, sustainable employment has the power to change the world. We have adopted a zero tolerance policy against forced labour, child labour and human trafficking and adhere to all international labour and immigration laws and regulations wherever we operate. It is our aim to not knowingly do business with any company that benefits in any way from the trafficking or abusive treatment of workers or any form of slavery.

Work gives you purpose, provides income and restores self confidence. Since 1948, we have proudly pioneered our industry and thrive on finding, cultivating and sustaining legitimate and visible workforces. Our family of brands spans over 75 countries and territories serving over 600,000 clients and finding jobs for millions of people each year. Since 1965 we have been connecting thousands of Australians to meaningful work every day, across a wide range of skills and industries, helping to power the success of clients around the country.

As trusted and responsible industry leaders, we know that unethical and exploitative operators act illegally under the guise of our industry to facilitate human trafficking and modern slavery, enabling illegitimate and invisible workforces. These practices are abhorrent to us and directly opposed to everything we stand for. ManpowerGroup has consistently and proactively voiced concern for and supported the call for action against human rights abuses in the world of work over many years. None the less the largely hidden problem of modern slavery is challenging to comprehend and counteract and we commend the introduction of the Commonwealth's Modern Slavery Act.

ManpowerGroup does not engage in or support any deceptive, coercive or otherwise exploitative practices in our operations. We strive to actively promote our Values and expectations of the same to our business partners and welcome the opportunity to review our human rights approach in line with the Modern Slavery Act.

During 2020 we developed an initial awareness and understanding of the hidden problem of modern slavery likely to exist within our supply chains. We reached out to external experts to help us decipher and clarify this. Our independent risk assessment suggested that links to modern slavery, while remote, are indeed present in the lower tiers of our supply chains. Tackling this problem will require a community effort on many levels and we are committed to playing our part, informed by our modern slavery risk profile, to help address and prevent human rights abuses in the world of work.

This initial Statement explains the actions we took to assess and address the problem of modern slavery against the reporting criteria in 2020, and our plans for continuous improvement in future years. Our work continues.



Richard Fischer
Managing Director
Manpower and Experis



Tim Roche
Country Manager
Right Management

Vision & Values

Our Vision is to lead in the creation and delivery of innovation workforce solutions and services that enable our clients to win in the changing world of work. Our Vision is underpinned by our Values of People, Knowledge and Innovation.

Code of Business Conduct and Ethics

The purpose of our Code of Business Conduct and Ethics is to provide guidance to all of our colleagues and partners on the conduct of our business according to the highest ethical standards. Our Company's brand and reputation is best known for its trustworthiness – an attribute that we intend to uphold in all that we do. ManpowerGroup has grown and prospered with a culture of honesty, integrity and accountability and we believe that this culture remains as our strong competitive advantage.

As a guide, the Code contributes to our future success by helping to maintain this culture. The Code also helps in the effective promotion and protection of our Brand and our various stakeholders. It helps to focus everyone on areas of ethical risk, provides guidance in recognising and dealing with ethical issues and provides mechanisms to report unethical conduct without fear of retribution.

To review the Code, please visit www.manpowergroup.com.au/ethics

All employees worldwide must complete annual training related to the Code of Business Conduct and Ethics and Company policies for Anti-bribery, Anti-corruption and Data privacy.

ManpowerGroup Business Ethics Hotline

Our Code of Business Conduct and Ethics promotes honest and ethical conduct throughout the organisation, as well as provides a mechanism to report unethical conduct via the ManpowerGroup Ethics Hotline to help preserve the culture of honesty and accountability throughout the Company.

ManpowerGroup's Ethics Hotline is a 24-hour secure hotline available to employees and the general public to report suspected, planned or actual violations of the ManpowerGroup Code of Business Conduct and Ethics, the law or any other workplace misconduct.

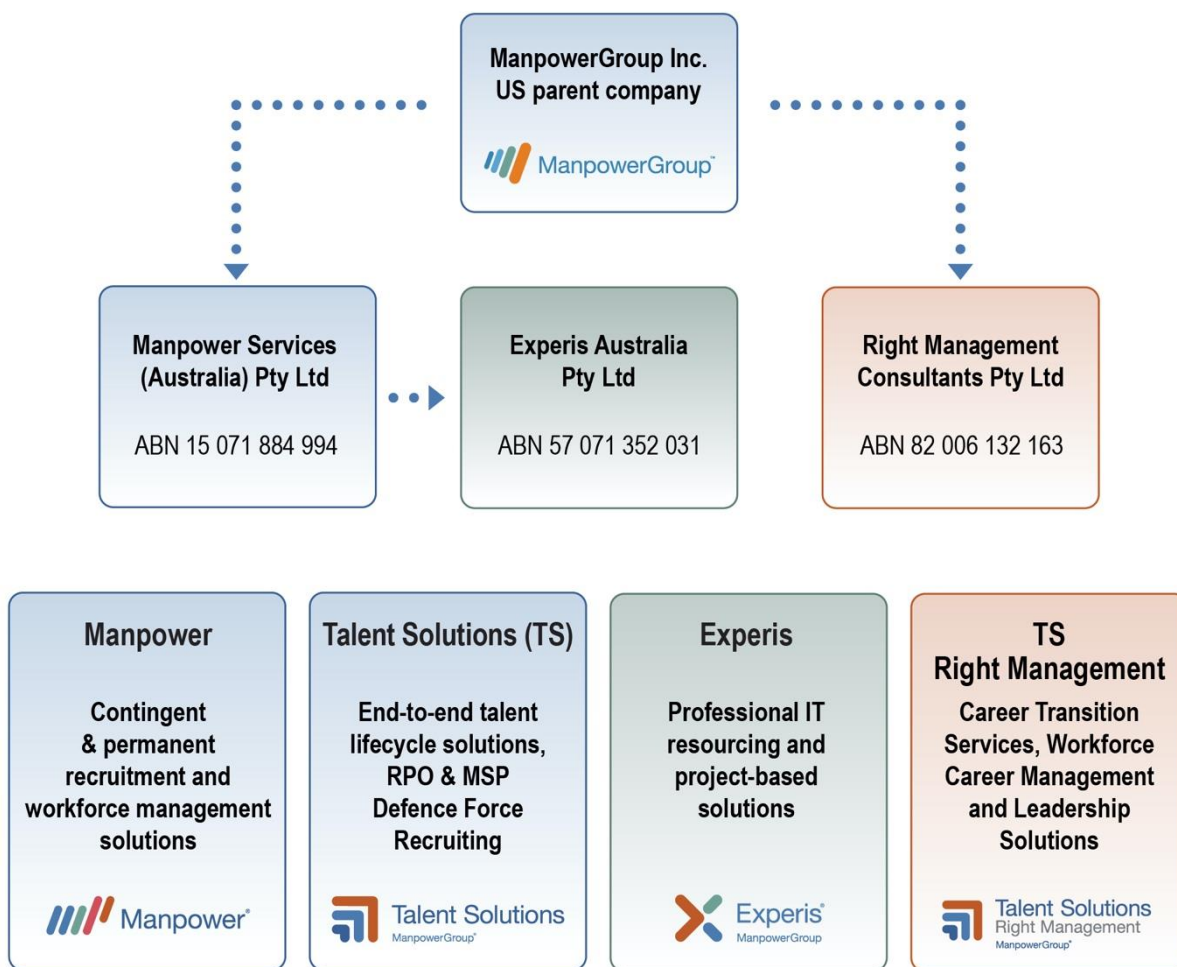
This global mechanism available in a range of languages and provides a wide range of country access codes to ensure access is readily available to anyone worldwide who has a concern to report, including our business partners, and their workers.

To submit a complaint in Australia call 1800 457 897 or visit

www.manpowergroup.com/ethics/business-ethics-hotline

2. Structure, Operations and Supply Chain

ManpowerGroup® (NYSE: MAN), the leading global workforce solutions company, helps organisations transform in a fast-changing world of work by sourcing, assessing, developing and managing the talent that enables them to win. We develop innovative solutions for hundreds of thousands of organisations every year, providing them with skilled talent while finding meaningful, sustainable employment for millions of people across a wide range of industries and skills. Our expert family of brands – Manpower®, Experis®, and Talent Solutions – creates substantially more value for candidates and clients across 75 countries and territories and has done so for over 70 years.



2.1 Brand Operations



Our corporate and head office business functions sit under the ManpowerGroup brand. Dedicated teams provide support for our operational brands Manpower, Experis and Talent Solutions in the areas of Sales, Marketing, Finance, Procurement, Shared Services, Legal, People & Culture, Information Systems and Operations. These functions are key enablers to our success as an organisation because their activities are aligned to support the efficient and effective delivery of our solutions, and our ethical business framework.



Contingent and permanent recruitment and workforce management solutions. Manpower provides organisations of all sizes with total talent management staffing solutions to enhance business agility and competitiveness. Operating Australia wide, Manpower helps our customers secure the right talent today, so they can win in the ever-changing world of work tomorrow.

Manpower delivers innovative staffing solutions which are agile enough to meet the rapidly changing talent needs of today's world of work. No matter what form these solutions take – short-term assignments, permanent placement or value add solutions – we provide rapid access to highly qualified talent and a better approach to matching the right associate with the right position resulting in better business results. Manpower leverages market experience, specialist focus and targeted sourcing methods to enable the development of quality talent pools across a broad range of role types in the following niches: Accounting & Finance, Corporate Services, Industrial & Technical, Sales & Marketing and Health, Safety & Environment.



Professional resourcing and project-based solutions. Leaders in sourcing in-demand professional talent for the ever-evolving technological world. Specialist Technology and IT recruitment.

At Experis, we help businesses overcome challenges, accelerate key initiatives and seize big opportunities by finding the best people in information technology that will lead them to success. Simultaneously, we open the doors for IT professionals who are looking to find an exciting new career opportunity where they can thrive and reach their full potential. We connect people and businesses alike in the ever-evolving world of IT.

Manpower and Experis – Recruitment Operations

Manpower and Experis service two of key customer groups, known as clients and candidates. Clients are companies, businesses or organisations seeking workers. Candidates are individuals seeking work. As recruiters we facilitate the connection between clients and candidates through fulfillment of job orders. Our core business is to provide recruitment and staffing services to our customers, enhanced by our deep expertise and insights into the world of work.

Temporary or contingent recruitment refers to a candidate being offered employment with us, for placement into a work opportunity with our client. The placed candidate is technically known as an on-hired worker, meaning an individual engaged by Manpower or Experis whose services are on-hired to one of Manpower or Experis' clients. On-hired work is also commonly referred to as labour hire, staffing or agency work.

Permanent recruitment is where we have been engaged by our client to coordinate a recruitment campaign on their behalf to identify and place a candidate into a permanent role as the client's employee.

In all cases we ensure that the individual seeking work is fully informed about the nature of the employment circumstances and work opportunity being made available to them during the recruitment process. Furthermore, we will only offer work opportunities after they have first been qualified as genuine, decent and safe in line with our Values.

For recruitment and staffing services performed by ManpowerGroup, customer satisfaction for both clients and candidates is the vital link to our success and neither can be compromised. An ethical and responsible recruitment framework is inherent within our business model and operations. All clients and candidates are given a clear and transparent understanding of the way in which we operate and what to expect when we deliver our services to them. Our recruitment consultants, administrators and managers are trained to operate within our ethical business framework and our corporate business functions provide the support they need to meet legal, regulatory and company obligations and standards.

From a commercial perspective, these minimum standards apply in our recruitment operations, and are fundamental to our business model:

We charge our clients fees for the service we provide in filling their 'job orders', and we require our clients to sign our terms of business or an equivalent contract beforehand. Our invoice is issued to the client organisation upon satisfactory fulfillment of their job orders or delivery of their workforce solution. We do not charge fees to individuals seeking work at any stage of the recruitment process. All candidates, including applicants, and workers of any type that interact with us are:

- **Never charged fees under any circumstances or at any time before, during or after their contact with us**
- **Never coerced or deceived about the true nature of the work opportunity we may be able to offer them**
- **Always free to accept, decline or discontinue any work opportunity of their own free will**

Furthermore, all individual temporary, casual or permanent employees are provided with an agreement to read, understand and sign that sets out their specific work and compensation arrangements, including their rights, responsibilities and protections. ManpowerGroup is proud to set a high industry standard of compliance and risk management for our customers, in line with our Values.



End-to-end talent lifecycle solutions. Helping align business growth with workforce solutions strategies to transform the way you source, manage and develop the right talent today, and for the future. Combining more than 40 years of expertise, we offer end to end talent lifecycle solutions by leveraging our consulting and analytics capabilities to help organisations more effectively source, manage and develop talent at scale.

Talent Solutions brings together our **MSP, RPO and Right Management** offerings to deliver technology-enabled, innovative workforce solutions to our clients. Our integrated solutions provide end-to-end, data-driven solutions for talent attraction, acquisition, development and upskilling, and retention at scale.

MSP and RPO Operations

Recruitment Process Outsourcing (RPO) Tailored solutions for permanent and contingent talent with a holistic approach to transforming how organisations source, manage and develop their workforce. The global leader in outsourcing services for large-scale recruiting and workforce-intense initiatives.

Managed Service Provider (MSP) Comprehensive global solutions that optimise contingent workforce management and drive performance through people, process and technology. Developing, deploying and enabling an integrated approach to managing contingent talent across Australia.

Where we develop MSP or RPO workforce solutions for clients through our Talent Solutions brand, we may assist our clients to manage other recruitment and staffing providers implemented as part of the solution. In our MSP agreements, the promise is generally to manage the client's overall contingent workforce program as defined in the client Statement of Work (SOW). The SOW will generally include specific language:

- To provide integrated resource fulfillment services to assist clients in the management and automation of their contingent and permanent workforce requirements.
- To provide vendor management and related services to assist clients in the automation of their staffing management processes.

In our RPO agreements, we generally have multiple performance obligations, which relate to managing all or part of the client's permanent workforce recruitment program, for example the RPO we deliver for the Australian Defence Force through our public-private collaboration called Defence Force Recruiting.

Again, these solutions are always delivered at the organisational level and apply the same standards whereby all fees charged are borne solely by clients, and never by candidates or workers. Transparency of work arrangements and recruitment process for individuals and candidates is fundamental and clear details always provided.

When working with other recruitment and staffing providers we are conscious of maintaining high standards of compliance and oversight for our customers and have developed rigorous selection and management processes to ensure these business partners meet the same ethical and responsible recruitment standards we set for ourselves. We expect that all our business partners will adhere to business principles, culture and values that are consistent and transparent with our own standards of social responsibility and sustainability. Where necessary we conduct due diligence, checks and reviews order to confirm that our expectations are being met, and where any improvements may be needed.



Enabling organisations to attract, develop and retain the top talent crucial for success in a rapidly transforming business environment. Outplacement, career management and leader development to accelerate organisational performance and build future ready talent.

Right Management offers our clients expertise, insights and solutions to help them manage their talent lifecycle, strategic workforce needs and organisational culture. Our three areas of operational expertise are Career Transition Services, Workforce Career Management, and Leadership Solutions.

Right Management – Operations

Career Transition Services Our outplacement and career transition services have helped more than 3.5 million people transition to new careers and opportunities. Our clients, organisations of all types and sizes, engage us to develop and deliver programs that:

- Support their employees with effective outplacements services for departing individuals
- Minimise the disruption of workforce transitions while also supporting remaining employees with career development support in the form of coaching and upskilling provided by dedicated coaches
- Maintain employer brand and ensure business continuity by proactively engaging and retaining critical talent

Workforce Career Management With global skills shortages at an all-time high, a workforce career management strategy is key to organisational success. We help businesses create agility within their workforces through flexible programs for managers and individuals. Our clients engage us to:

- Provide organisational consulting services and insights into changing roles and the talent pipelines to fulfill them, and the change management expertise to support the adoption of new workforce strategies
- Assist organisations to provide career development and opportunities internally, to engage, retain and reskill their talent
- Develop and deliver manager and career coaching programs and tailored leadership solutions

Leadership Solutions Based on extensive research, our leadership solutions are powered by our leader effectiveness model, to help our clients invest in the right people. We use globally validated assessments and expert coaching to help identify and develop your leaders of today – and tomorrow.

- Leader assessment and selection, onboarding, development and coaching
- Team effectiveness, change management

Right Management's operational expertise is underpinned by Talent Solutions market leading Workforce Analytics and Data-Driven Capabilities. From a commercial perspective, our solutions and services are primarily delivered to organisations who are charged fees for the services we provide to them and their people. An individual career guidance program is available as an additional offering for individuals seeking to invest in their own personal development and this program operates independently from any recruitment services offered by ManpowerGroup.

2.2 Supply Chain

ManpowerGroup conducts its operations from leased office premises in a range of capital city and regional centres around Australia.

Physical infrastructure needed includes office furniture, reception, kitchen and bathroom facilities, meeting rooms equipped with video conferencing and presentation aids, IT infrastructure ranging from telephone systems to server rooms, printers and copiers, laptops and mobile devices for staff, electronic access and security systems, software systems and technologies, car parking, heating and cooling equipment, energy and water utilities. Facilities management services such as cleaning, repairs and maintenance allow us to provide safe and healthy workplaces. A variety of consumables ranging from milk and filtered water to stationery supplies and business cards are purchased, along with courier, postal and storage services.

Some of our operational teams reach their target market through a series of events and presentations hosted in venues around metropolitan and regional Australia, requiring the purchase of signage, merchandise, venue hire, plant and equipment hire, catering, conference and stallholder fees. Event management services, activity providers, speakers and associated support services are utilised. Travel methods for staff to reach their destinations are primarily by air and road including car hire and other passenger transport services, and hotel accommodation is provided for staff required to be away from home.

Services to support our operations include a range of internet based applications, platforms and online systems, including website design and delivery, advertising services, social media and communications tools, HR, financial,

accounting and banking systems, sales and recruitment databases, applicant capture, tracking and associated management systems, candidate assessment, training and background checking software, electronic form delivery and reporting tools.

Various licences, regulations, memberships and insurances are purchased, as is external advice for legal, workers compensation, safety, audit and assurance, specialist project consultants, public relations and incidental professional services. Staff amenities include benefits and recognition programs, health and wellbeing services, gifts and flowers to mark key occasions, awards and contributions.

ManpowerGroup's procurement function manages suppliers and contracts over \$20K, following defined policies and procedures. A range of individual role holders are authorised to make purchases on behalf of the company within a defined scope and value as applicable to their role, and in line with company policies.

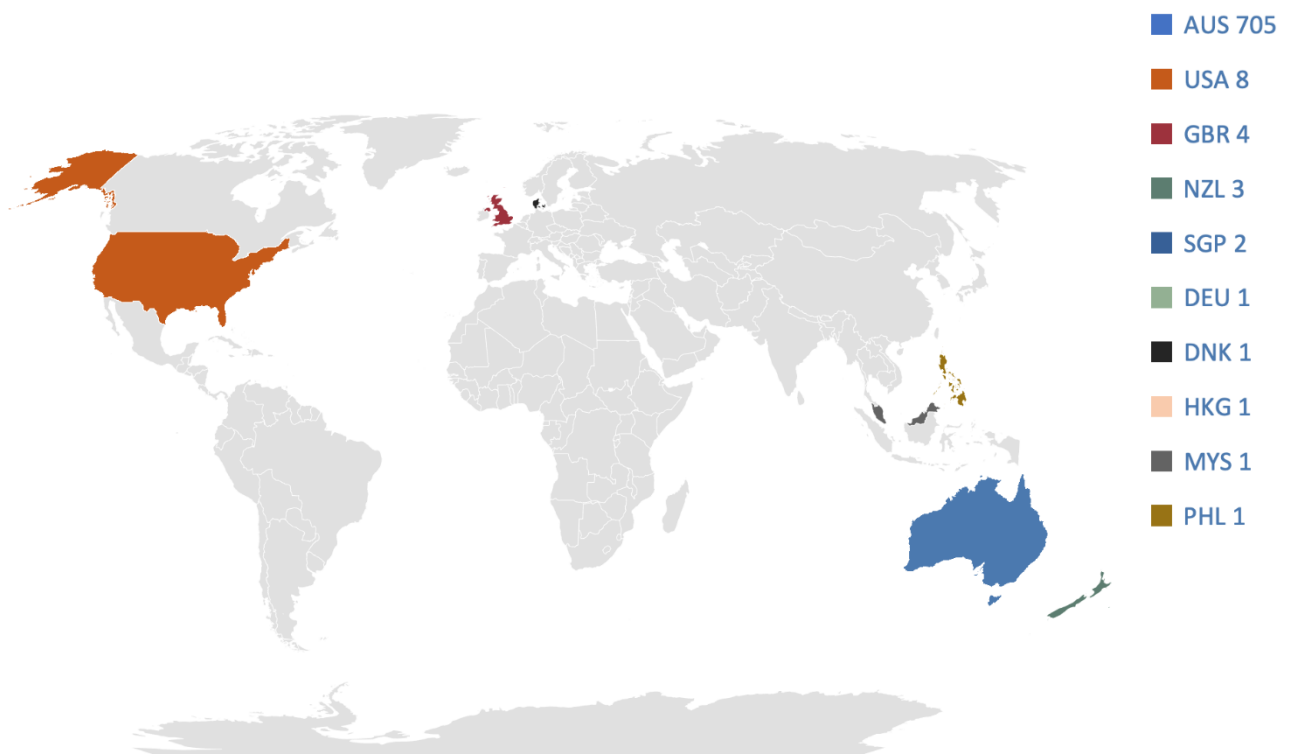
A significant segment of our supplier base is a variety of recruitment and staffing service providers from within our own industry, these are carefully selected business partners delivering workforce related services as part of an overall MSP or RPO solution managed by ManpowerGroup under the Talent Solutions brand. Whilst the costs associated with these suppliers are ultimately borne by our clients, working with business partners from within our own industry sector is a key element of our business model and falls under our direct management. From time to time, we also utilise the services of specialist recruitment agencies when searching for talent to staff our business.

Supplier Breakdown by Entity

ManpowerGroup uses suppliers drawn from a wide range of industry sectors, including many single sector suppliers. The following information relates to the twelve-month period to the end of September 2020.

Manpower Services (Australia) Pty Ltd used 727 suppliers from 97 industry sectors. 97% of suppliers operate within Australia, the remainder as shown below:

Supplier Country - Manpower

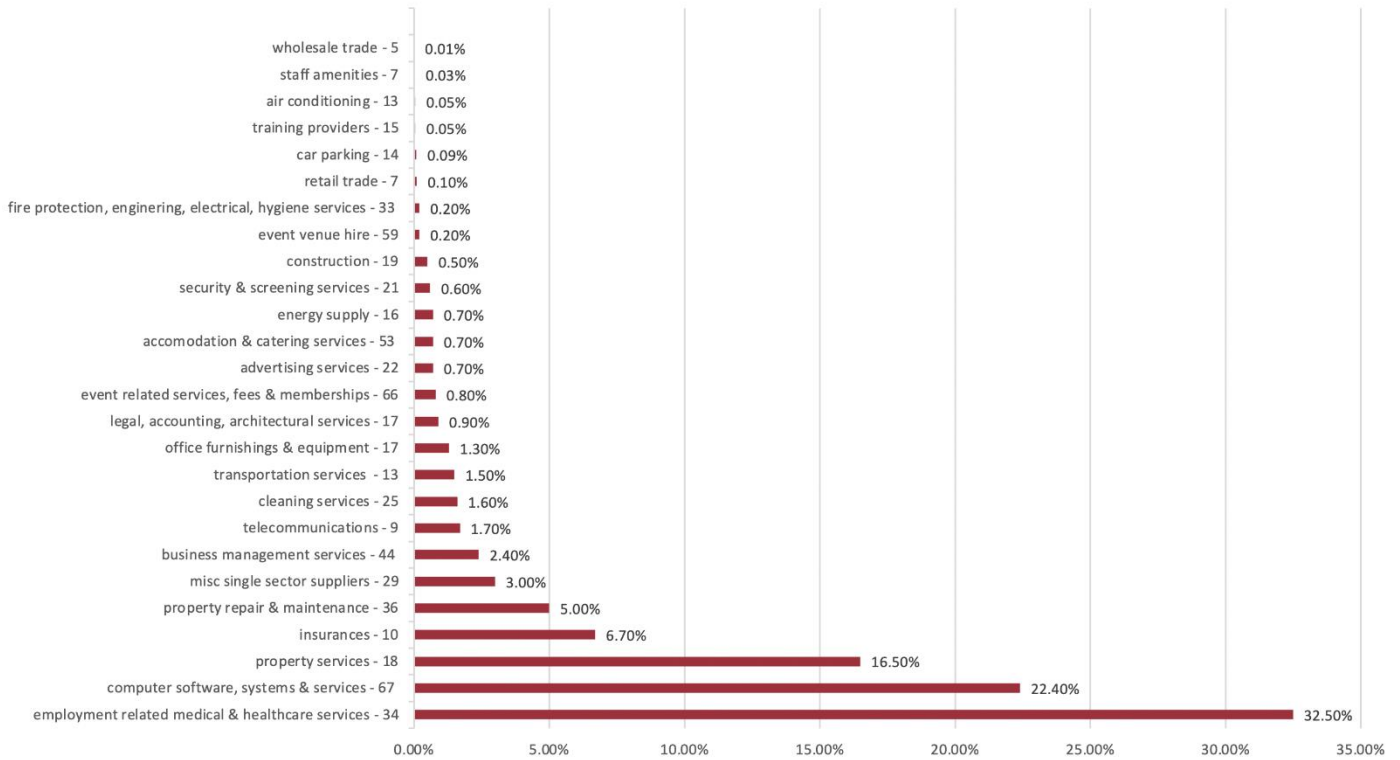


81% of Manpower's spend was with 62 suppliers from our own industry sector (employment placement) for the provision of staffing and recruitment services. These are carefully selected business partners all operating as Australian companies. Most of these suppliers are engaged through Talent Solutions and contribute towards the tailored workforce solutions developed for our MSP and RPO clients.

19% of Manpower's spend was with 665 suppliers from a range of other industry sectors summarised below. This supply chain includes suppliers for ManpowerGroup corporate functions that are shared across our entities and brands.

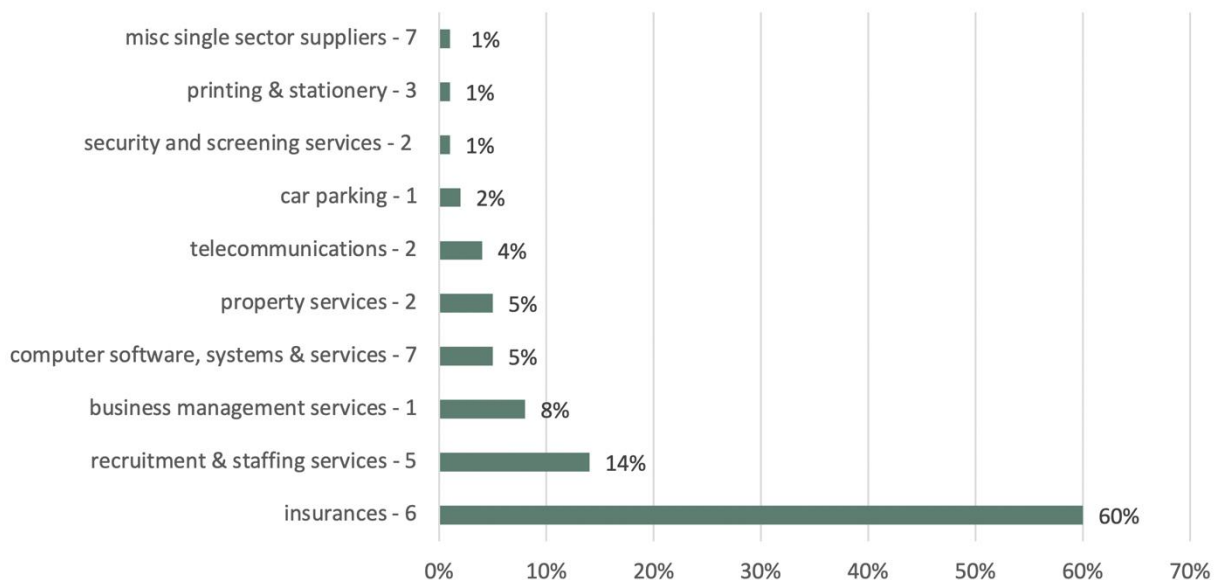
We note that this data includes suppliers based in countries of particular concern for known slavery practices (Malaysia and Philippines), that we no longer engage with.

Supplier spend breakdown (excluding staffing/recruitment) Manpower



Experis Australia Pty Ltd used 36 suppliers from 23 industry sectors. 95% of suppliers operate within Australia, the remainder from the USA. 60% of Experis' spend was with 6 suppliers from the Insurance sector, followed by 14% with the employment placement sector

Supplier spend breakdown - Experis

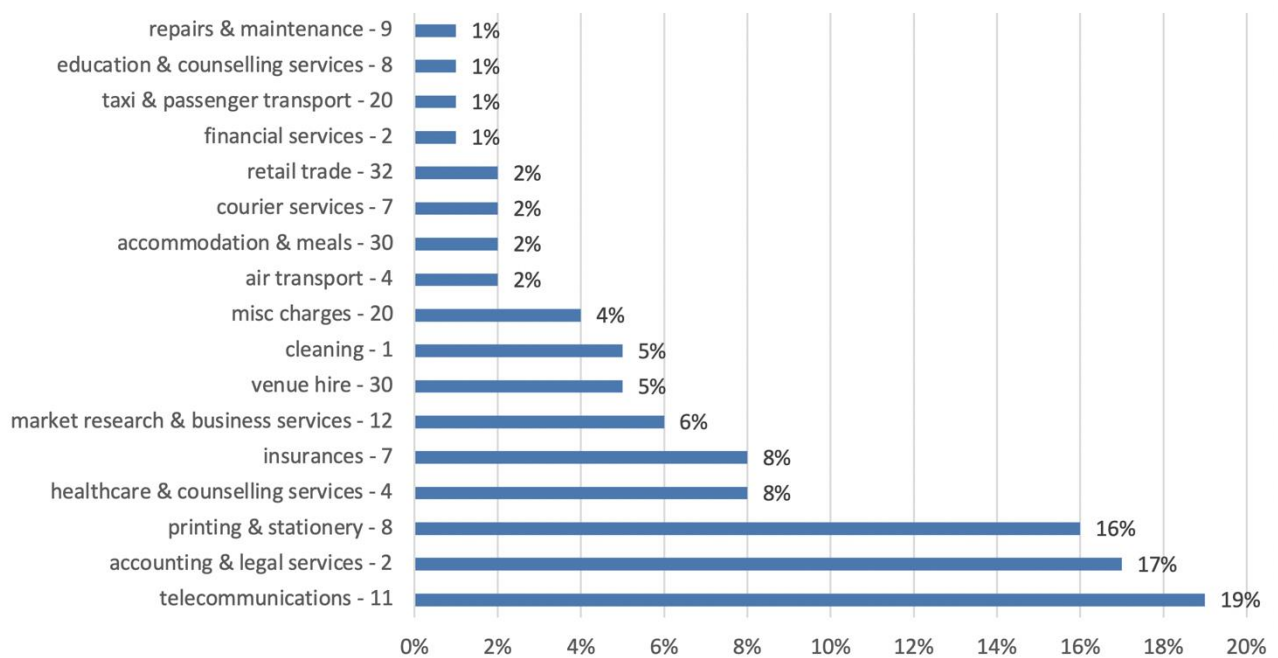


Right Management Consultants Pty Ltd used 245 suppliers from 43 industry sectors. 98% of suppliers operate within Australia, the remainder from the USA, New Zealand and Canada.

77% of Right Management's spend was with 38 suppliers for computer software, systems and services.

23% of Right Management's spend was with 207 suppliers from a range of other industry sectors summarised below.

Supplier spend (excluding computer related) - Right



2.3 COVID-19 Response

In response to the COVID-19 pandemic, ManpowerGroup took steps at the global, regional and country level to protect our employees and continue to serve our customers. During a rapidly evolving situation the health, wellbeing and safety of our people was our utmost priority. Actions to keep our people safe during this time included:

- *Putting in place the technology, tools and security that allowed staff to work remotely wherever possible*
- *Introducing safe environments with reduced sized teams and adapted shift patterns that allowed social distancing, additional hygiene provisions, personal protective equipment and enhanced cleaning procedures*
- *Anticipating and responding to the fast-changing situation, communicating regularly and complying with authorities for the latest health and safety standards.*

As the pandemic's impact deepened, ManpowerGroup counteracted the business slowdown through careful management of resources and expenditure to keep the business viable and positioned for recovery. It was necessary to revise our forecasting and budgets due to continuing weakness in the economy, and inevitably an impact on headcount across our operations was felt when it became clear that economic recovery would take some time. The preparation of this statement was affected in the following ways:

- *Availability of internal resources due to business continuity and crisis management priorities*
- *Internal training schedule paused*
- *Reduced management availability for projects not directly related to core business viability*

Despite coinciding with the necessity for careful expense management due to the impact of the COVID-19 pandemic, the business case for engaging external data analysts to assess modern slavery risk was approved, in line with our Values and commitment to eliminating human rights abuses in the world of work.

We supported our clients with solutions they needed, proactively partnering with them to ensure the safety and well-being of our on-hired workforce, including:

- *Host clients required to provide their COVID-19 management plan showing a COVID safe workplace included on-hired workers prior to approval to return to work or commence at a new workplace*
- *All current and prospective staff and on-hired workers required to complete a COVID-19 Health Screening form prior to approval to return to work or commence at a new workplace*
- *Application of the relevant award guidelines for leave and pay arrangements for our associate workforce*

For those finding themselves out of work due to the pandemic, our e-learning resources were made available for them to build new skills and support them to transition and upskill for future positions.

With regard to our suppliers, with many of our leased office spaces closed indefinitely, we applied for rent relief but did not otherwise seek to vary or cancel contracts or impose new conditions on our suppliers due to the pandemic. As would be expected, volumes reduced for some services in line with overall business slowdown, and the need for some goods and services temporarily ceased, particularly those related to travel, accommodation and events. As outlined in this statement, our approach to the risk of modern slavery practices in our supply chain was to first understand the nature of our risk exposure through a data based risk assessment, and build from that foundation to implement appropriate actions to assess and address our modern slavery risks.

3.1 Risks of Modern Slavery – Operations

Operations Analysis – Manpower, Experis, Talent Solutions (RPO and MSP)

ManpowerGroup holds Labour Hire Licences and Employment Agent Licences in all states and territories that require them including Victoria, Queensland, South Australia, Western Australia and the Australian Capital Territory. As a licenced labour hire agency we meet our obligations for regular reporting to the regulators.

ManpowerGroup has maintained Staffsure certification since 2017. The Staffsure Standard and certification program was developed by the Recruitment and Consulting Services Association (RCSA) in consultation with industry, government and unions. StaffSure allows Workforce Service Providers to prove and market their business integrity and by doing so, protect the broader integrity of the recruitment and staffing industry throughout Australia.

Unfortunately, unethical and exploitative operators exist who in no way reflect the values and practices of the legitimate employment placement industry sector. These ‘sham’ operators are of great concern to organisations like ManpowerGroup that are committed to

operating legally and in the best interests of our clients, candidates and on-hired workforce.

Cases of labour exploitation in Australia have been identified in industries with a high percentage of migrant workers holding temporary work visas such as working holiday makers, international students, skilled temporary workers, seasonal workers as well as illegal workers. Within Australia industries considered to be at risk of forced labour exploitation include agriculture, construction, domestic work, meat processing, cleaning, hospitality, and food services.

ManpowerGroup does not actively seek clients from these sectors, however in 2020 Manpower did provide services to clients from all but one of these sectors (domestic work). Job seekers holding temporary work visas in working holiday makers and international students are welcomed across all our brands provided we can offer them roles within the limitations of their visa conditions. ManpowerGroup is not involved in the Australian Government’s Seasonal Worker Programme.

Exploitation risks in the employment placement sector and controls in place at ManpowerGroup:

Type of risk	Relevant brand	Description and controls
Child labour Likelihood – occasional	Manpower	<ul style="list-style-type: none"> • Work eligibility policy and procedures • If a work rights check confirms that the candidate is aged less than 18 years, ManpowerGroup’s legal team is contacted to determine whether the employment of the candidate will comply with applicable laws before the candidate can be placed in an assignment or put forward for a permanent position.

Type of risk	Relevant brand	Description and controls
<p>Poor / unsafe working conditions</p> <p>Likelihood – possible</p>	<p>Manpower Experis Talent Solutions</p>	<ul style="list-style-type: none"> • Health & Safety policy and procedures include: • Workers are provided with information, instruction, training and supervision necessary to safely carry out their responsibilities. • Process for ensuring that workers including on-hired workers are only required to undertake tasks and/or operate plant, machinery and equipment that they are appropriately trained, competent or qualified for. • Managers at all levels are accountable and responsible for the safety and health of all workers in their teams, and for ensuring on-hired workers are not placed at risk to their health and safety at client workplaces. • Undertaking not to provide service if a safe and healthy workplace is not available for on-hired workers.
<p>Excessive hours</p> <p>Likelihood – possible</p>	<p>Manpower Experis Talent Solutions</p>	<ul style="list-style-type: none"> • Fatigue Management Standard in place and applicable to all workers, including fatigue rules. • Overtime management through payroll monitoring and concerns about excessive hours raised with clients.
<p>Deceptive and coercive recruiting</p> <p>Likelihood – nil</p>	<p>Manpower Experis Talent Solutions</p>	<ul style="list-style-type: none"> • All individuals are free to accept, decline or discontinue work of their own choice, with suitable notice. • Our global Code of Business Ethics and Conduct sets our culture of ethical behavior by being open and honest about our business conduct. It states that in our sales, marketing and communication practices we will strive to present only accurate and truthful information about our products and services in presentations, discussions with clients, our advertising, promotional literature and public announcements. This is reinforced by management and annual training in the Code. • All on-hired workers asked to review and sign A Guide to our Ethical Code, which includes details about how they can report concerns via our global Ethics Hotline.

Type of risk	Relevant brand	Description and controls
Underpayment of wages Likelihood – rare	Manpower Experis Talent Solutions	<ul style="list-style-type: none"> • Modern Awards Pay Guide produced by our legal team. This document provides an overview of modern awards in Australia and links to supporting information to assist staff to determine the correct award for the particular employee or job, and guidance for reading / interpreting the award. • All on-hired workers are provided with an agreement to read, understand and sign that sets out their specific work and compensation arrangements, including their rights, responsibilities and protections and a link to the Fair Work Act Information Statement. • Proper record keeping, payroll and accounting systems, subject to annual external audits. • Workers are paid directly in to own bank account; individual pay advice is sent directly to each worker's personal email or mailing address.
Unauthorised payroll deductions, fees or debts Likelihood – nil	Manpower Experis Talent Solutions	<ul style="list-style-type: none"> • Payroll deductions are made upon request by the worker and only for standard types available in our payroll database such as union fees, additional superannuation, child support etc. • ManpowerGroup never charges fees to candidates or workers for employment placement services. • ManpowerGroup does not provide services to obtain work visas or travel to Australia. • Should a payroll error occur leading to overpayment, approval is obtained from the affected worker to have this deducted from their next pay or over a suitable time frame.
Withholding identity and travel documents Likelihood – nil	Manpower Experis Talent Solutions	<ul style="list-style-type: none"> • Under our work eligibility policy we must sight, review and take a copy of all identity and work rights documentation. There is no requirement to retain originals and we never demand this. • Since December 2019 all applicants are able to upload their documents electronically for verification.

Type of risk	Relevant brand	Description and controls
Substandard accommodation and restriction of movement Likelihood – rare	Manpower Experis Talent Solutions ManpowerGroup Internal Staff	<ul style="list-style-type: none"> We do not provide accommodation or supply to clients that do, however there is the potential for this to happen if our staff or on hired workers are required to travel for work. Mitigation is offered in the form of using our or our client’s travel booking agencies. We do not impose any restrictions of personal freedom on our staff or on-hired workforce and should we become aware of this and would withdraw on-hired workers from client placements and investigate or refer to the ABF as appropriate.
Client industry sector and role type Likelihood - occasional	Manpower	<ul style="list-style-type: none"> Contract review and risk assessment process in place for all instances across ManpowerGroup where our standard Terms of Business are not used. This process considers legal, commercial and practical operational obligations for whether they are realistic, achievable, priced correctly and that risks are actively identified and managed. Any deviations from our standard position require senior management approval and only company Directors have authority to sign on behalf of the business. Manpower reset their business mix in 2019-20 moving away from blue collar clients which sought low skilled and low paid workers and industries considered to be at risk of labour exploitation.
Migrant workers on temporary work visas Likelihood - possible	Manpower Experis Talent Solutions	<ul style="list-style-type: none"> Under our work eligibility policy, individuals are only considered for work that is within the limitations specified on their work visa. An explanation is provided to applicants that cannot be considered due to visa conditions to explain why not. Work limitations are captured on filled job orders and reflected in role types and end dates. Work hours limitations are monitored through payroll reports.

Operations Analysis – Right Management

The nature of Right Management’s operations delivering consulting services to organisations means that their exposure to modern slavery risk is within the supply chain rather than day to day operations.

3.2 Risks of Modern Slavery – Supply Chains

Supply Chain Analysis

To understand the modern slavery risks present in our supply chain, we opted for a data-driven approach that would provide valid foundational indicators of where and to what extent modern slavery related risk is likely to exist. Ultimately this approach will underpin the improvements we'll make to our supplier management practices when it comes to managing the risks of modern slavery and guide our actions as we play our part in ending modern slavery.

To properly understand our risk exposure to modern slavery, we decided to analyse our supply chains against the key global indicators of modern slavery – geography, industry sector and commodity.

Conscious of the complexity this involves, we reviewed a range of vendors offering supplier risk management services with a modern slavery lens, and this research enabled us to identify what we could best perform ourselves, and where an investment in external expertise would stand us in good stead.

For this initial reporting period, we reviewed the suppliers used by Manpower, Experis and Right Management for the twelve-month period to the end of September 2020. Guided by a specialist legal firm with expertise in ESG data analytics, we undertook preparation of a valid data set, a process that involved a detailed review of our spend data and transaction history, and highlighted the value of capturing additional information about the goods and services we buy to assist in managing suppliers appropriately for modern slavery risks.

We identified the type of industry sector each supplier belonged to, their country of operation and categorised transactions by the type of

product/service purchased for over 1000 individual suppliers. Improvements to our financial systems to streamline this process have since been highlighted for future implementation.

The risk assessment results returned in November 2020 drilled down beyond the top tiers of our supply chain and gave us an independent insight into where the hidden problem of modern slavery is likely to occur. It suggested that whilst ManpowerGroup has a very low risk profile, links to modern slavery practices probably exist in our supply chains, as expected.

However, these links are in the mid-lower tiers of our supply chain well away from any direct oversight we might hope to exercise, and our total theoretical slavery footprint is estimated as being very low at less than 1 slave per supplier. We note that the risk assessment provided us with a theoretical modern slavery footprint and does not confirm the existence, or nonexistence, of any actual incidence of slavery. The type of modern slavery risk is not known.

Whilst ManpowerGroup **does not directly cause or contribute to modern slavery practices**, we remain committed to addressing links to human rights abuses within our operations and supply chain, no matter how small or remote these seem at the point of purchase.

Organising our supply chain data took time and gave insights into the range of buying practices that take place within ManpowerGroup, which along with an awareness of what modern slavery really means in practice, provides us with a genuine foundation for our future actions.

Supply Chain Results and Priorities

As discussed above, 81% of Manpower's spend for the period assessed was within our own industry sector of **employment placement** (i.e. staffing and recruitment services), with carefully selected business partners all operating as Australian companies. The majority of these are engaged through Talent Solutions and contribute towards the tailored workforce solutions developed for our MSP and RPO clients.

Given the size of spend and theoretical slavery footprint for this industry, combined with our own deep industry knowledge and Values, it makes sense to focus our efforts on how we can address the risks of modern slavery practices potentially or actually occurring within our own industry sector. Whilst we are by no means complacent about monitoring our own operations, ManpowerGroup is well positioned as an industry leader for promoting best practice in the world of work and we do not welcome unethical and exploitative operators being associated with the legitimate employment placement sector.

60% of Experis' spend was with 6 suppliers from the **insurance** sector, followed by 14% with the employment placement sector, whilst 77% of Right Management's spend was with 38 suppliers for **computer software, systems and services**. Therefore, we will prioritise these industry sectors in our actions to assess and address modern slavery risks.

Manpower

- Industry sector: Employment placement (75) | Market research and other business management services (25)
- Theoretical Slavery Footprint per \$M: 0.02 (the estimated number of slaves per \$M of spend)
- Total theoretical slavery footprint for all suppliers & spend within this industry sector: 6
- Total suppliers: 62

Experis

- Industry sector: Insurance
- Theoretical Slavery Footprint per \$M: 0.01 (the estimated number of slaves per \$M of spend)
- Total theoretical slavery footprint for all suppliers & spend within this industry sector: 0.00358
- Total suppliers: 6

Right Management

- Industry sector: Computer and technical services
- Theoretical Slavery Footprint per \$M: 0.019 (the estimated number of slaves per \$M of spend)
- Total theoretical slavery footprint for all suppliers & spend within this industry sector: 0.0618
- Total suppliers: 38

ManpowerGroup is also mindful of suppliers from industry sectors that tend to utilise young and migrant based workforces, performing the type of high volume low skilled work often associated with exploitation such as cleaning, hospitality and construction.

Where pertinent we will include these industry sectors in our actions to assess and address modern slavery risks, regardless of our spend for these industry sectors: Cleaning; Hotels, clubs, restaurants and cafes and Construction (non-building, non-residential).

4. Actions to Assess and Address Modern Slavery Risks

In late 2019 a senior member of ManpowerGroup's Executive Leadership Team was assigned to oversee and facilitate our response to the Modern Slavery Act. A project was established in Q1 2020 and tasked to meet the Modern Slavery Reporting Requirement. Resources were drawn from the legal, procurement and operations teams and commenced work to develop and embed a working knowledge of modern slavery within the organisation and recommend how best to implement the reporting criteria into our business management systems and practices.

Standard Operating Procedures

As an employment placement provider, ManpowerGroup will continue to follow our established standard operating procedures for all placement related activities delivered by Manpower, Experis and Talent Solutions. This includes procedures for meeting all applicable legal and regulatory requirements to ensure that Australian workplace rights and obligations are understood and upheld by all parties in the employment relationships we manage (i.e. clients, candidates and our own consultants). Our standard operating procedures are underpinned by ManpowerGroup's internal oversight and monitoring mechanisms that measure compliance and identify improvement opportunities.

While identifying our modern slavery risks, a number of recommendations for improvement to our policies and procedures were made and have been scheduled for 2021, including:

- **Update work eligibility policy and procedures to explicitly prohibit the retention of original identity and travel documents**
- **The Guide to our Ethical Code provided to all new on-hired workers to include information about exploitation risks and how to report concerns via ManpowerGroup's Ethics Hotline**
- **Review and update process followed for payroll deductions requested by the on-hired worker and risk indicators to look for**
- **Review and document process for rectifying payroll errors leading to overpayments and how the overpayment is returned**
- **Update advertising guidelines to explicitly prohibit deceptive and coercive recruiting practices and mandate accurate and truthful advertising of work opportunities**
- **General review of all policies and procedures for inclusion of content related to modern slavery risks.**

Supplier Self-Assessment Questionnaire

In line with the expectations set out in our Supply Chain Business Partner Policy and Supplier Code of Conduct, we are committed to working together with our business partners to identify and understand where there may be risks of modern slavery practices in their operations and supply chains. In 2020 several clients of ManpowerGroup requested that we provide them with information on a range of sustainability topics including modern slavery. We responded cooperatively to these requests and will continue to do so.

We took account of our experience as a respondent when researching and designing our own self-assessment questionnaire for modern slavery practices.

ManpowerGroup's Supplier Self-Assessment Questionnaire is ready for implementation in 2021 and respondents will be selected based on the priorities identified through the supply chain risk assessment exercise completed in November 2020.

As discussed above, these priorities are based on the predominant industry sector spend by each entity which are employment placement, insurance and computer and technical services. ManpowerGroup is also mindful of suppliers from other industry sectors that tend to utilise young and migrant based workforces, performing the type of work often associated with exploitation such as cleaning, hospitality, facilities maintenance and construction, and therefore we will select respondents from these industry sectors regardless of our spend.

It should be noted that our Supplier Self-Assessment Questionnaire is not designed to “pass or fail” suppliers. Its purpose is to identify modern slavery risks that may be present within their operations and supply chains as well as to identify any remediation efforts to address these issues in a sustainable manner. Information is included to help respondents understand the intention of the questionnaire and the way in which we will use the information provided. The expectation is that where there are differences, ManpowerGroup and the supplier will agree on an acceptable level of consistency and that the supplier will actively work toward achieving the desired level of performance. Our aim is to improve the integrity and quality of our business operations and supply chains. However, as a last resort, we are prepared to terminate business with any supplier that does not demonstrate progress toward aligning their operations with our Supplier Code of Conduct.

Engaging positively with our business partners in this way is a key action we can take to play our part in addressing world-wide modern slavery, human trafficking and related practices. Our business partners will be encouraged to use or adapt our questionnaire to identify modern slavery risks within their own supply chains.

Supplier Management Processes

ManpowerGroup's procurement function follows documented and sound business procedures for the procurement of goods and/or services from outside sources and guides the business in fostering healthy, mutually beneficial partnerships with vendors. In line with our Supply Chain Business Partner Policy, ManpowerGroup develops supplier alignment with our standards by incorporating the Supplier Code of Conduct into our supplier approval processes. Our Supplier Code will be provided to all suppliers at the earliest opportunity, no matter how large or small.

In 2021 ManpowerGroup will provide the new Australian version of our Supply Chain Business Partner Policy and Supplier Code of Conduct to all current and potential suppliers and incorporate the Supplier Self-Assessment Questionnaire into supplier approval processes that are managed through our procurement function.

Since October 2019, ManpowerGroup's supplier contracts have included a modern slavery clause. Where a contract is in place, acceptance of our modern slavery clauses is required. Where the other party's contract is used, we will accept their modern slavery clause once it has been reviewed by our legal team.

In 2021 the base contracts used to engage business partners from the employment services sector for our MSP and RPO solutions will updated to contain the modern slavery clause.

The external risk assessment undertaken in 2020 highlighted the value of capturing additional information about our suppliers aligned with modern slavery risks, and an interim supplier register was developed for this purpose. Improvements to the supplier management functionality of our financial systems have been highlighted for future implementation, with timeframes to be determined. Ultimately, this will enable efficiencies in data capture and reporting to support early identification of modern slavery risk factors, tracking of due diligence activities and enhancement of our supplier management processes related to modern slavery.

Talent Solutions maintains a suite of policies and procedures for the engagement and management of employment placement suppliers to support the delivery of tailored workforce solutions for our MSP and RPO customers. A high-level review of this document suite was undertaken in Q4 2020 and identified improvement opportunities for managing modern slavery risk.

As a result of this a detailed review and update has been scheduled for 2021, and improvements will include specifying provision of the new Australian version of our Supply Chain Business Partner Policy and Supplier Code of Conduct to all current and potential suppliers and incorporating the Supplier Self-Assessment Questionnaire into supplier approval processes managed by Talent Solutions.

Internal Education

In 2020 key individuals including directors, executive leaders, legal and procurement functions were provided with high level awareness of the problem of modern slavery and explanation of our obligations under the Modern Slavery Act. A key message was delivered through management setting expectations for handling requests from our clients related to modern slavery and sustainability, that all such requests for information be directed to the appropriate internal teams with knowledge about modern slavery practices to allow for an informed and genuine response.

In 2021 our awareness raising program will be extended to internal buyers operating outside of the formal procurement function, to educate them about modern slavery and actions they can take.

This will include:

- Providing suppliers with our Supply Chain Business Partner Policy and Supplier Code of Conduct
- Request inclusion of our Modern Slavery contract clause in instances where supplier terms are used
- Use of the Supplier Self-Assessment Questionnaire for certain types of supplier

In 2021 we will implement materials to improve general awareness of modern slavery across ManpowerGroup and communicate changes to policies and procedures that are updated for modern slavery risks and controls.

Supply Chain Business Partner Policy and Supplier Code of Conduct

ManpowerGroup has a long standing global Supply Chain Business Partner Policy that sets out our expectations in requiring our business partners to be committed to business principles, culture and values that align with our own commitments to social responsibility and sustainability, and that these business partners are committed to certain key practices as outlined in our Supplier Code of Conduct.

A review of the Policy and Code identified that improvements were needed to bring it into line with the Australian Modern Slavery Act. In December 2020 we received approval from our global headquarters to publish an Australian version of the Policy and Code of that reflects the language and requirements of the Australian legislation.

This provides us with an appropriate platform for re-implementation of the Policy and Code with our suppliers and business partners in 2021.

The Australian version of our Supply Chain Business Partner Policy and Supplier Code of Conduct was then made publicly available on the ManpowerGroup Australia website and can now be readily found by visitors to our Manpower, Experis, Talent Solutions and Right Management sites through the implementation of links to ManpowerGroup's Sustainability content, available at <https://www.manpowergroup.com.au/sustainability/supply-chain>

Human Rights Due Diligence Framework and Reporting Mechanism

ManpowerGroup maintains an Ethics Hotline, a 24-hour secure hotline available to employees and the general public to report suspected, planned or actual violations of the ManpowerGroup Code of Business Conduct and Ethics, the law or any other workplace misconduct. This global mechanism available in range of languages and provides a wide range of country access codes to ensure access is readily available to anyone worldwide who has a concern to report, including our business partners and their workers. Concerns may be raised anonymously via telephone or the internet.

ManpowerGroup will not take any action against an individual as a result of raising an ethical concern in good faith. All reports are taken by trained operators and made available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident.

- Information about the Ethics Hotline is provided during onboarding for all new staff and on-hired workers, as well as being easily found on all brand websites. ManpowerGroup Australia also maintains these related policies:
- Whistleblower Policy
- Anti-retaliation Policy
- Workplace Discrimination, Harassment and Bullying Policy

To submit a complaint in Australia call 1800 457 897 or visit www.manpowergroup.com/ethics/business-ethics-hotline

ManpowerGroup has a global Human Rights Due Diligence Framework that describes how responsibility for human rights due diligence is embedded throughout our organisation.

The global framework will be reviewed and updated in line with the Modern Slavery Act with a view to releasing an Australian version in 2021.

Case Study – Averting Potential Deceptive Recruitment Practices

Whilst not an actual case of modern slavery, this scenario, which occurred in November 2020, illustrates the potential reach of modern slavery practices and the actions taken by ManpowerGroup Australia to prevent a transaction that could have led to a devastating outcome for the individual concerned.

ManpowerGroup Australia was contacted by ‘Manu from India’ (not his real name) through our website. Manu sought to verify a payment request which he had received, for work permit services provided by an agent purporting to represent Manpower India, which in turn claimed to be related to Manpower Australia’s Sydney office.

*“... I am looking for Australia work permit based on 482 visa and I got your agent in India. I got your proforma Bond from Indian agent ... So I want to know this bond is original or fake so how can I forward that bond to you and to verify is original or fake?”
(sic)*

We were concerned. Manpower Australia does not provide any of the services that Manu was being asked to pay for, and we do not charge workers or work seekers ‘consultancy charges’ of any sort. Upon review of the ‘proforma bond’ we identified key issues including:

- Poorly forged letterhead and company logo
- Basic mistakes in name, address, email and website link
- Signed by someone not known to our organisation.

Manu was being asked to sign an agreement to make payment of \$5000 AUD to obtain an Australian work permit, that was clearly a fraud related scam. Within hours of sighting the ‘proforma bond’ we responded to Manu alerting him of this.

“We confirm that our company never issued this document to you we and do not have an agent in India. This document is fraudulent and not connected to Manpower. We urge you to not make any payments to this person and report this to your local authorities. For all information regarding visas, please contact the Australian Immigration Department.”

We then took the following actions:

- Reported the matter to the Australian Competition and Consumer Commission’s Scam Watch Register
- Escalated the matter to our APME legal counsel who escalated it further to our global legal office and the head of legal at Manpower India
- Made an external communication via our Manpower Australia website and social media pages to alert job seekers
- Made an internal communication to alert our people and advise what to do should they become aware of any similar instances of this nature

Manpower India reported the matter to Cyber Cell, the Indian agency for reporting cybercrime.

This situation represents not only fraud related activity, but also a **deceptive recruiting practice** that could potentially lead to **human trafficking**. There is the possibility in this practice that innocent people could find themselves on a pathway to **debt bondage**, in exchange for a work permit and promise of work in Australia.

Like many other organisations, ManpowerGroup has developed a heightened awareness of frauds, scams and cybercrime in recent years.

These elements can sometimes mask an underlying connection to modern slavery practices, particularly when the intended target is a remote individual and our global brand name is being used illegally. Internal communications raised awareness of the underlying issue and training materials will be enhanced with this case study.

We sought a further reply from Manu however have received no response.

5. Assessing the Effectiveness of Our Actions

ManpowerGroup's objectives for the modern slavery project in 2020 were to develop and embed a working knowledge of modern slavery within the organisation and recommend how best to implement the reporting criteria into our business management systems and practices. Our goals were threefold:

- Understand the issue of modern slavery globally and in Australia
- Unpack the reporting requirement and develop our approach in responding compliantly
- Uncover the risks of modern slavery in our operations and supply chains.

A formal assessment of the effectiveness of our actions to assess and address modern slavery risks was not undertaken in 2020. However, these activities took place to assess the effectiveness of our work:

- Preparation of a project plan and timeframes and regular meetings with the executive sponsor to monitor progress against the objectives, goals and project plan
- Formal goal setting for individuals with responsibility for modern slavery reporting built into their annual performance review process
- Providing updates to the Executive Leadership Team which includes members from each entity.

In 2021, senior management will conduct a formal joint review of our actions to assess and address modern slavery risks in our operations and supply chain, with the review agenda to include:

- **Improvement and implementation of policies and procedures for modern slavery risks**
- **Delivery of planned internal education**
- **Implementation of our Supply Chain Business Partner Policy and Supplier Code of Conduct**
- **Implementation of our Supplier Self-Assessment Questionnaire**
- **Supplier management and approval processes for Talent Solutions**
- **Release of an Australian version of our Human Rights Due Diligence Framework**
- **Regular engagement and feedback between key areas of our entity**

6. Consultation Process

Throughout the reporting period covered by this joint statement, regular consultation and updates took place with each of the entities covered by this statement. The consultation process was led by the senior member of ManpowerGroup's Executive Leadership Team responsible for ManpowerGroup's response to the Modern Slavery Act. The consultation undertaken included regular briefings to directors and senior management from each entity about the work of the project team and seeking their review and approval of the recommendations made.

Other consultation during the reporting period included the formation of a cross functional team to review and recommend a suitable vendor for the supply chain data analysis, and consultation with each entity to understand the industry group and type of product or service for suppliers, where not already known.

7. Other Relevant Information

Sustainability Commitment

For more than 70 years we have operated globally on the belief that meaningful, sustainable employment has the power to change the world.

We believe businesses have a responsibility to contribute to a sustainable future for work, for workers and for the world. We are driven to lead by example, and we are guided in everything we do by our Values, our Code of Business Conduct and Ethics and the UN Global Compact Principles and Sustainable Development Goals.

At the global level, ManpowerGroup signed up to the UN Global Compact in 2006. We actively support the UN's [Sustainable Development Goals](#) around Education, Gender Equality and Decent Work for Economic Growth because they are directly related to our core business therefore giving us an opportunity to make a real difference in the areas we can impact most.

“Doing well by doing good” was our mantra long before the words were coined. The Sustainable Development Goals fit what our culture has always been. It was important for us to accept the challenge they offer and play a role in advancing their mission. We do that through our own [Sustainability Plan](#), which is built around learnability and employability — getting young people ready for work, helping people skill up and building inclusive workplaces.

Certifications, Licences and Affiliations

ManpowerGroup maintains certifications against the following Standards:

- AS/NZS 4801:2001 Occupational Health and Safety Management Systems
- AS/NZS ISO 9001:2015 Quality Management Systems
- AS/NZS ISO 14001:2015 Environmental Management Systems

ManpowerGroup holds Labour Hire and Employment Agent Licences in all states and territories that require them including Victoria, Queensland, South Australia, Western Australia and the Australian Capital Territory.

ManpowerGroup have strategic affiliations with industry bodies and diversity groups including:

Association of Professional Staffing Companies (APSCo)

ManpowerGroup Australia is a member of APSCo (formerly known as ITCRA) and has held general membership with the group since September 2000. This long-standing association has provided us with support and resources in terms of industry knowledge, events, job board and resume database services as well as regular industry updates.

Recruitment and Consulting Services Association (RCSA)

The RCSA Australia and New Zealand sets professional standards, conducts research, educates and develops members' skills, monitors industry developments, and lobbies State and Federal Governments on issues directly affecting members.

In 2006 ManpowerGroup was one of the first to implement the RCSA Service Delivery Standard. In 2017 ManpowerGroup achieved certification against the StaffSure Standard developed by the RCSA in conjunction with independent certification firm, SGS. The Staffsure Certification scheme makes it simple for business, government and workers to find and partner with reputable Workforce Service Providers such as labour hire companies, professional contracting firms and private employment agencies.

The World Employment Confederation (WEC)

The WEC is voice of the private employment services industry at the global level, representing national federations as well as workforce solutions companies from across the world. As a founding member of the WEC ManpowerGroup is committed to the prevention of human trafficking, and to not charging any fees or costs to job seekers or workers (whether directly or indirectly) in both national and international settings.

At a global level, ManpowerGroup are annual attendees and contributors to the World Economic Forum (WEF). This forum sets the stage for the Group to learn, discuss and provide input into the macro and micro economic issues which then contribute to the shape of our own focus and priorities.

8. Approval

This statement has been reviewed and approved by the principal governing body of each reporting entity covered by it and is signed by an authorised officer of each of those reporting entities.



Richard Fischer
Managing Director
Manpower Services (Australia) Pty Ltd
and Experis Australia Pty Ltd



Tim Roche
Country Manager
Right Management Consultants Pty Ltd