



## FINITE GROUP MODERN SLAVERY STATEMENT

### Structure and Operations:

This is a Joint Statement made on behalf of:

- **Finite Group APAC Pty Ltd** (trading as **Finite IT Recruitment** and **Rowben Consulting**); and
- **FinXL Professional Services Pty Ltd** (trading as **FinXL IT Professional Services**, **XL Digital** and **Southern Cross Computing**),

together referred to in this Joint Statement as 'Finite Group'.

Finite and FinXL are Australian private limited companies under a common parent, Allermuir Holdings Pty Ltd. Allermuir Holdings Pty Ltd is an Australian private limited company and is also the parent of related New Zealand companies, Finite Group NZ Limited (trading as Finite920) and FinXL Professional Services NZ Limited (trading as FinXL IT Professional Services).

Finite is the IT recruitment and labour hire arm of the Finite Group and FinXL is the IT services and consultancy arm. The Finite Group engages circa 2000 contractors/consultants to provide specialist IT services to its clients across Australia and NZ, and it employs approximately 150 internal staff to manage those client relationships and to provide the back-office support required.

Finite Group does not tolerate slavery, human trafficking, forced or child labour or child exploitation of any kind. Finite Group is committed to respecting human rights and fair labour practices and working with its suppliers and clients to eradicate forced labour in Australia, NZ and beyond.

Finite Group recognises the responsibilities it has within the supply chain to provide skilled labour to its clients and to ensure that all the workers it engages (directly and indirectly through a 3<sup>rd</sup> party supplier) are treated fairly, ethically and in compliance with legislative requirements. Finite Group's policies, procedures and practices are designed to protect human rights throughout the recruitment, selection and placement cycle and throughout all assignments and projects it performs for its clients. Finite Group also takes steps to ensure that its suppliers of back-office supplies and services also meet the same high standards. Finite Group does not manufacture or sell physical products.

In Australia, both Finite and FinXL operate under the same policies and procedures, have the same senior leadership team and have many of the same suppliers. This Joint Statement is a single, consolidated description of the actions of both Finite Group APAC Pty Ltd and FinXL Professional Services Pty Ltd to address modern slavery.

### Relevant Finite Group Policies and Procedures:

Finite Group has in place the following policies and procedures to assist it in managing human rights, promoting diversity and ensuring compliance with legislation.

### **Human Rights Statement:**

Our Human Rights Statement outlines our commitment to providing a healthy and safe workplace that encourages respect, diversity and fairness, is free from discrimination, harassment and bullying and complies with all human rights laws and takes steps to prevent modern slavery and corruption.

### **WHS Statement and WHS Policy:**

Our WHS Statement and WHS Policy describe the steps we take to identify and eliminate WHS risks and promote workplace safety (including conducting safety inspections at host client sites and providing training and inductions). Finite Group also requires its host clients to provide a safe workplace for our workers, and requires workers themselves to work safely and consider the health and safety of those around them.

### **Supplier Engagement Policy:**

Our Supplier Engagement Policy outlines our commitment to the UN Guiding Principles on Business and Human Rights and the principles we expect suppliers to comply with in doing business with Finite Group (including holding a Labour Hire Licence, where required).

### **Labour Hire Licence Compliance Policy:**

Our Labour Hire Licence Compliance Policy ensures that Finite Group personnel (and Management) understand their responsibility to ensure that, where required by law, suppliers of labour hire services to the Finite Group have the required labour hire licence (including processes for recording licence details, diarising expiry dates and confirming renewals).

### **Code of Ethics and Practice:**

Our Code of Ethics and Practice outlines the requirement for our staff to act ethically and responsibly in all the work they do for the Finite Group. Staff are required to ensure compliance with industry best practice, agreements and applicable legislation, including following/enforcing WHS procedures and avoiding/preventing discrimination, harassment, bullying, bribery & corruption and modern slavery in our business and in our supply chain.

### **Whistleblower Policy:**

Our Whistleblower Policy provides guidance and protections to Finite Group personnel to enable them to report suspected unlawful/unethical behaviour to Finite Group Management to ensure legal and ethical standards are maintained.

In addition to the policies mentioned above, our comprehensive policy suite includes the following people and human rights focused policies:

- Diversity Policy
- Discrimination, Bullying & Harassment Policy
- Etiquette and Behaviour Policy
- Domestic Violence Policy
- Parental Leave Policy
- Sponsorship Policies
- Grievance Policy

### **Finite Group's Approach to Managing Modern Slavery Risks:**

As well as ensuring the Finite Group policies and procedures are communicated to the relevant parties (including suppliers) and are understood and complied with, we ensure that:

1. we do not charge any fees to individuals to allow them to register with us, join our database, gain access to job opportunities or apply for our jobs.



2. For all workers (internally providing services to the Finite Group and externally providing services on our behalf to our clients, whether they are engaged as freelance professionals/contractors or employees);
  - a) they are provided with clear and comprehensive written terms and conditions (including in relation to rates of pay/fees, hours and location of work, duties and responsibilities and client requirements, as applicable);
  - b) the employment contracts comply with all applicable employment-related legislation;
  - c) they are given the opportunity to discuss and negotiate terms (to the extent that we have flexibility under the relevant work order from the client) and they have a strong bargaining position due to shortages in IT professionals and recruiters; and
  - d) there is no pressure on those individuals to apply for or accept work and they can terminate their engagement (in accordance with the contract terms) at any time.
3. an individual has the appropriate work rights to live and work in Australia/NZ, as required. We ask to see copies of passports and visas and confirm this through official websites designed for this purpose (e.g. Vevo checks).
4. any business supplying labour hire services to Finite Group (that is required to have a labour hire licence) has the appropriate licence in place and is required to provide evidence of this and its currency (and there are procedures in place to confirm the licence details).
5. all our legal obligations are complied with in the recruitment and on-boarding process (including WHS requirements).
6. We do not supply accommodation directly for our employees and contractors (other than occasional overnight accommodation in hotels where they are required to undertake short business trips for work). Hotels are generally minimum 3 star and approved by the individual.
7. Our systems and procedures (including for generating and approving new contracts and giving workers access to timesheets etc) have controls in place that aim to prevent placements from occurring without the appropriate checks having been performed (including work rights checks, police checks where required, labour hire licence checks, obtaining privacy consents, confirming WHS training and inductions have taken place, obtaining banking and superannuation instructions, returning signed contracts etc). Systems are in place to note expiring visas/licences and to follow up on missing documentation.
8. We provide ongoing training for our sales staff who are responsible for sourcing and placing candidates (on utilising our CRM system and implementing our practices and procedures) and those staff are encouraged to obtain APSCo and other industry body qualifications and certifications and to comply with industry best practice as well as legal requirements in the performance of their duties.
9. We provide training for our internal administration/contracts management and accounts/payroll and HR staff who are responsible for checking all recruitment and on-boarding practices and procedures have been followed.



## **Finite Group's approach to Supplier Risk Management**

Our Modern Slavery Framework includes the following:

- Modern Slavery Statement (this document)
- Mapping of Suppliers
- Review of Supplier Agreements
- Compliance with our Supplier Engagement Policy
- Completion of our Supplier Questionnaire
- Modern Slavery Risk Assessments
- Modern Slavery Reporting (as required by law)

We have adopted a risk-based approach to managing any potential modern slavery vulnerabilities within our business and our supply chain. Whilst we consider the risk of modern slavery within our direct business operations to be low, we do recognise that through our supply chain we can be exposed to the risk of modern slavery.

We have used external resources (including the Department of Home Affairs Guidance), advice from professional bodies (such as APSCo) and activity within our industry to inform our risk assessment approach.

### **Mapping of Finite Group's Supply Chain:**

We have mapped our supply chain, noting all major suppliers to our offices/businesses in Australia. Included in Finite Group's supply chain are suppliers of: professional services (including marketing, accountancy, auditors, debt collection, lawyers, training, marketing services etc); insurance; IT hardware, software and maintenance; cleaning; office maintenance; couriers and postal services; document storage and disposal; office supplies (flowers, fruit, coffee, newspapers, plants, water, stationary); office security; parking; entertainment, catering and alcohol; travel; utilities and recruitment services, payroll services and labour hire services (for internal use and to assist in meeting the needs of our clients).

### **Key Indicators of Modern Slavery Risks:**

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

- High risk countries/areas – e.g. countries with less stringent labour laws and/or high poverty
- High risk products/services – e.g. those involving unskilled/physical/factory work
- Vulnerable populations – e.g. staff on temporary visas and young/disadvantaged/non-English speaking staff;
- Business models with high risk practices – e.g. commission-only pay arrangements, paid in food/accommodation, isolated/remote/live-in work.

Where multiple high-risk indicators co-exist, there is a greater likelihood of modern slavery and additional controls are required. Accordingly, we have focused on the following industries in our assessment of our suppliers:

- Catering and hospitality
- Office supplies
- Commercial cleaning and office maintenance
- Services/products from overseas

We have graded our suppliers (as green [safe], orange [clarify] or red [requiring review]) based on the existence of key indicators of modern slavery in relation to their business/products. We are committed to working more closely with those identified as 'higher-risk suppliers' to ensure they have the appropriate procedures in place to ensure there is no modern slavery in their supply chain.

#### **Review of Supplier Agreements:**

Upon entering into new contracts with new suppliers or reviewing/updating contractual arrangements with existing suppliers, agreements are reviewed and (where appropriate) relevant provisions are inserted regarding modern slavery, and suppliers are directed to our Supplier Engagement Policy. This is done so that suppliers fully understand the risks of modern slavery and their obligations to avoid it and to assist the Finite Group in meeting its obligations.

#### **Supplier Questionnaires and Risk Assessments:**

All new and renewing suppliers will be required to complete the Supplier Questionnaire so as to assist Finite Group in identifying, preventing and mitigating the risk of modern slavery in its supply chain.

Although we expect our suppliers to identify and manage their own modern slavery risks in accordance with modern slavery legislation, we intend to conduct risk assessments based on the responses to our Supplier Questionnaire, with a focus on compliance in the following areas:

- Ensuring lawful/proper recruitment practices
- Avoiding forced /Child Labour
- Avoiding Debt Bondage
- Ensuring fair Wages & Conditions
- Allowing for workers to terminate their employment/engagement.

Suppliers may be required to provide further information and/or participate in an audit and, if required, suppliers will be required to cooperate with Finite Group in taking remedial action to mitigate/remove any identified risks of modern slavery.

#### **Follow-up Action:**

We will continue to review and adapt our modern slavery framework, including:


- assessing the effectiveness of the actions we have taken to date;
- requiring suppliers to update the Supplier Questionnaire regularly to monitor progress;
- performing gap analysis and continuous improvement of our existing controls; and
- designing and drafting enhancements (or new controls) to respond to identified risks, in the form of documentation, policies, processes, training and amendments to supplier contracts.

As required by law, we will report to the relevant authorities on our modern slavery practices and relevant findings.



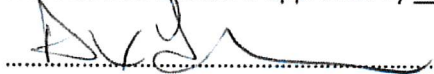
**Approval:**

1. This Joint Statement is approved by **Finite Group APAC Pty Ltd:**

  
.....

Signature of Duncan Thomson, General Manager (on behalf of the Board of Directors).

2. This Joint Statement is approved by **FinXL Professional Services Pty Ltd:**

  
.....

Signature of Duncan Thomson, General Manager (on behalf of the Board of Directors).

**MINUTES OF BOARD OF DIRECTORS MEETING  
FINITE GROUP APAC PTY LTD**

**COMPANIES:**

FINITE GROUP APAC PTY LTD (ACN 085 406 300) of 'ANGEL PLACE', LEVEL 23, 123 PITT STREET,  
SYDNEY, NSW 2000

**HELD AT:**

Sydney

**ATTENDED BY:**

Duncan William Thomson and Tracy Jane Thomson

**CHAIRPERSON:**

Duncan William Thomson (Director) was appointed as the Chairperson of the meeting.

**RESOLUTIONS:**

It was RESOLVED that:

- 1)** the attached Finite Group Modern Slavery Statement for the financial year ending 30 June 2020 (**Statement**) is formally approved on the date stated below by the Board of Directors for Finite Group APAC Pty Ltd as a joint statement with FinXL Professional Services Pty Ltd under section 14(2) of the Modern Slavery Act 2018 (**Act**);
- 2)** the Statement is approved on behalf of the Board of Directors of Finite Group APAC Pty Ltd (being the principal governing body of the Company) by signature of the Chairperson on the Statement itself and below in approval of these Resolutions; and
- 3)** the Statement (and these Minutes), once approved by the Chairperson, should be submitted to the Australian Border Force through the Online Register for Modern Slavery Statements in accordance with the Act.

There being no further business the meeting was closed.

**SIGNED BY THE CHAIRPERSON**

On behalf of Finite Group APAC Pty Ltd:



Duncan William Thomson

Dated: 15.3.2021

**MINUTES OF BOARD OF DIRECTORS MEETING  
FINXL PROFESSIONAL SERVICES PTY LTD**

**COMPANY:**

FINXL PROFESSIONAL SERVICES PTY LTD (ACN 104 804 793) of 'ANGEL PLACE', LEVEL 23, 123 PITT STREET, SYDNEY, NSW 2000

**HELD AT:**

Sydney

**ATTENDED BY:**

Duncan William Thomson and Tracy Jane Thomson

**CHAIRPERSON:**

Duncan William Thomson (Director) was appointed as the Chairperson of the meeting.

**RESOLUTIONS:**

It was RESOLVED that:

- 1)** the attached Finite Group Modern Slavery Statement for the financial year ending 30 June 2020 (**Statement**) is formally approved on the date stated below by the Board of Directors for FinXL Professional Services Pty Ltd as a joint statement with Finite Group APAC Pty Ltd under section 14(2) of the Modern Slavery Act 2018 (**Act**);
- 2)** the Statement is approved on behalf of the Board of Directors of FinXL Professional Services Pty Ltd (being the principal governing body of the Company) by signature of the Chairperson on the Statement itself and below in approval of these Resolutions; and
- 3)** the Statement (and these Minutes), once approved by the Chairperson, should be submitted to the Australian Border Force through the Online Register for Modern Slavery Statements in accordance with the Act.

There being no further business the meeting was closed.

**SIGNED BY THE CHAIRPERSON**

On behalf of FinXL Professional Services Pty Ltd:



Duncan William Thomson

Dated: 15.3.2021