

## **Modern Slavery Policy Statement**

### **1. Introduction and Commitment**

APG Hire Pty Ltd (APG Hire) is an Australian-owned company that has been operating since 2017. We are a national workforce management leader, providing comprehensive workforce management services to clients across Australia. We offer labour hire, permanent recruitment, temporary recruitment, and a range of other solutions including WH&S, risk management, and HR/IR consultancy.

APG Hire unequivocally opposes modern slavery in all its forms, including forced labour, human trafficking, child labour, servitude, and deceptive recruitment practices. We are committed to respecting internationally proclaimed human rights and fair labour practices, and conducting business ethically and responsibly. As a people-first organisation where "People Matter", this commitment is deeply aligned with our core values. This policy/statement outlines the steps APG Hire takes to assess and address the risks of modern slavery in our operations and supply chains, demonstrating our ongoing commitment to ethical sourcing, recruitment, and business practices.

### **2. Entity Structure, Operations, and Supply Chains**

**2.1 Reporting Entity** This Modern Slavery Policy Statement is made on behalf of APG Hire.

**2.2 Structure and Operations** APG Hire is an Australian-owned company established in 2017. We operate as one of Australia's leading national workforce management companies. Our operations are supported by a national presence with branches located across metro and regional areas in every Australian state. Our comprehensive services include:

- Labour hire
- Permanent and temporary recruitment services
- Maintenance and engineering solutions
- WH&S solutions
- Accountability and reporting
- Risk management
- Human Resource (HR) and Industrial Relations (IR) consultancy

We partner with companies of all sizes, from SMBs to government and multinational companies, with sites throughout Australia. We serve a broad range of industries, including:

- Civil / Construction / Trades
- Manufacturing
- Warehousing / Logistics
- Agriculture / Farming
- Transport / Distribution
- Food & Beverage Manufacturing
- Industrial Manufacturing
- Corporate (Office and Professional services)

### 2.3 Supply Chains APG Hire's supply chains primarily consist of two categories:

- **Supply of Personnel:** Sourcing candidates for our clients. This involves identifying and engaging individuals to be placed in temporary assignments or permanent positions with our clients.
- **Supply of Goods and Services:** Procuring goods and services required for APG Hire's own operations. This includes office supplies, IT services, and potentially other services like cleaning or utilities.

### 3. Risks of Modern Slavery Practices

APG Hire acknowledges that, by virtue of contracting with other parties, whether clients or suppliers, there is always some inherent risk that could potentially contribute to modern slavery practices. We have not had any reports, grievances, or knowingly undertaken transactions with suppliers associated with modern slavery activities to date.

We consider the risk of modern slavery within our direct operations to be relatively low, similar to other staffing companies. However, we recognise potential vulnerabilities could arise through a failure to apply our standards, identify potential breaches in employment conditions, or potentially through breaches or exploitation of visa conditions for employees.

Risks are more likely to be present within our supply chains. Potential risks can manifest through our client engagements and, more significantly, through our direct suppliers and their downstream supply chains. Based on our industry focus and the experiences of similar companies, potentially higher-risk areas within the supply chain could include:

- Engagement of improper or unlicensed labour hire providers.
- Suppliers providing services like cleaning, catering, or security for our offices.
- Suppliers of uniforms or personal protective equipment (PPE) that we acquire.
- Suppliers of industrial materials, equipment, and tooling relevant to the manufacturing, mining, construction, or agriculture industries we serve.

While most of our supply chain spend is likely within Australia, where modern slavery risks are generally assessed as lower compared to some other countries, diligence is still required across all engagements.

### 4. Actions Taken to Assess and Address Modern Slavery Risks

APG Hire is committed to a proactive approach to identifying, preventing, and mitigating modern slavery risks. Our actions are embedded within our governance structure, policies, procedures, and stakeholder engagements.

**4.1 Governance and Policies** Our commitment to safe and ethical practices is supported by a suite of policies and processes. While the APG source highlights existing frameworks such as our thorough system of WH&S Induction and Training and various Risk Management Plans (Industrial Relations, Operational Risk, Risk and Opportunities, Crisis Management), we also rely on foundational policies such as a Code of Conduct and a Whistleblowing Policy (where stakeholders can report concerns anonymously). These policies collectively outline expected standards of ethical conduct, fair treatment, and compliance with all applicable laws and regulations, including those related to labour practices. We expect our suppliers to adhere to similar high ethical standards.

#### 4.2 Due Diligence and Risk Assessment

- **Candidate Vetting:** We undertake strict compliance checks to verify the identity of each worker and ensure their legal right to work in Australia before placement commences. Our human resources and payroll processes are designed to ensure workers are paid correctly in accordance with relevant

modern awards or enterprise agreements. We do not charge fees to individuals for finding employment opportunities.

- **Supplier Due Diligence:** Our contractual relationships with suppliers include requirements for compliance with legislative obligations, including modern slavery laws. We aim to progressively evaluate, track, and monitor modern slavery risks across our goods and services providers.
- **Risk Assessment:** We adopt a risk-based approach to managing potential vulnerabilities. Risk assessments may be integrated into our existing Operational Risk Management Plan. We recognise that industries we serve, and specific types of suppliers, may carry higher risk and tailor our due diligence accordingly. We aim to include Modern Slavery audits into our internal audit program, particularly for higher-risk vendors.

**4.3 Training and Awareness** We maintain a focus on training and collaboration to improve awareness among our workforces. Relevant employees, particularly those involved in recruitment, candidate engagement, and procurement, receive training on identifying the signs of modern slavery, understanding related risks, and knowing how to escalate concerns. Initiatives like employee surveys and quiz demonstrate our commitment to practical, engaging reminders that reinforce key procedures and the 'why' behind them, providing a foundation for broader awareness campaigns on ethical workplace practices.

**4.4 Grievance Mechanisms** We ensure that employees, candidates, and other stakeholders have access to dedicated channels to raise concerns. This includes procedures for reporting conduct or behaviour inconsistent with our values, policies, and legislative requirements. Concerns raised are treated confidentially, and we are committed to protecting individuals who report concerns in good faith from retaliation. We aim to provide mechanisms that allow for anonymous reporting.

**4.5 Stakeholder Engagement** We engage with clients and suppliers to promote awareness and adherence to ethical labour practices. We encourage our clients and suppliers to promote similar standards in their own supply chains. Our active involvement in local communities and support for organisations like Ronald McDonald House Charities aligns with our "Because People Matter" value and underscores our broader commitment to contributing to a society where individuals are treated with dignity and respect.

**4.6 Remediation** Should a potential or actual instance of modern slavery be identified in our operations or supply chains, APG Hire will take prompt and appropriate action. This would involve investigation of the concern and working with the relevant parties to address the issue, which could include implementing corrective actions, providing support to affected individuals, and, in cases of non-compliance, potentially reviewing or terminating contractual relationships.

## 5. Assessing Effectiveness

APG Hire is committed to continuously assessing the effectiveness of the actions we take to assess and address modern slavery risks. We aim to measure effectiveness through various means, including:

- Regular reviews by relevant internal teams.
- Internal audits of specific due diligence processes for candidates and suppliers.
- Monitoring legislative updates and ensuring our policies and procedures remain compliant.
- Monitoring reports of potential incidents of modern slavery received through grievance mechanisms.
- Engaging with suppliers to understand their progress in addressing modern slavery risks.

We aim to review and update this policy and our related procedures regularly to ensure they remain robust and reflective of best practices.

## 6. Consultation Process

In developing this Modern Slavery Policy Statement, APG Hire has undertaken an internal consultation process. This involves engaging with key internal stakeholders across relevant areas of the business,

including those involved in operations, human resources, risk management, procurement, and compliance. The consultation process aimed to identify potential risks within our specific business units and supply chains and review the effectiveness of current controls and proposed actions.

#### **7. Approval**

This Modern Slavery Policy Statement has been approved by the relevant senior management or governing body of APG Hire.

A handwritten signature in blue ink, appearing to read "Dhaval Trivedi", is written over a faint, rectangular stamp.

Dhaval Trivedi  
General Manager