

This statement covers the activities of Clear Marketing Solutions Pty Ltd (ABN 67 169 004 504) trading as Clear Admin People in understanding and implementing actions to minimise the risk of modern slavery in our operations and supply chain.



Modern Slavery Statement

2023



SECTION 1 Introduction

This is the first Modern Slavery Statement for Clear Marketing Solutions Pty Ltd trading as Clear Admin People (Clear Admin People) under the Modern Slavery Act (Cth) 2018 (Act).

The purpose of this statement is to outline our approach to ensuring that Clear Marketing Solutions Pty Ltd has appropriate frameworks and processes in place to minimise the risk of modern slavery throughout our business operations and supply chain.

At Clear Admin People, we recognise that slavery and human trafficking can occur in many forms, as considered in the Act. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

Clear Admin People is committed to operating responsibly and establishing and adhering to ethical standards that support United Nations Sustainable Development Goals, in particular Goal 8. Inclusive and sustainable economic growth, full and productive employment and decent work for all is important to us. We support this goal and commit to working to eradicate the many forms of modern slavery.

SECTION 2

Our Structure, Operations & Supply Chain

Clear Marketing Solutions Pty Ltd (ABN 67 169 004 504) trading as Clear Admin People (Clear Admin People) is an Australian-registered entity. It was registered in April 2014. It is owned by its Australian shareholders.

This statement covers Clear Admin People and B4B Solutions Inc., an entity registered in the Republic of the Philippines (B4B) that is associated with the managing director of Clear Admin People. That director is also the senior officer of B4B, with the title President.

In broad terms, we provide remote staffing to Australian clients, known as 'offshoring'. Clear Admin People acts as the contracting entity with our clients. In turn, it contracts with B4B for the provision of the remote staff. B4B is the employer of those staff. This relevantly involves (as described by the Act) the following operations:

- **Direct employment of workers, both as permanent employees or on a contract basis.**
- **Provision and delivery of services to other businesses.**

ENTITY	MAIN OPERATIONS	SUPPLY CHAIN
Clear Admin People	<ul style="list-style-type: none">• Contracting entity with our clients• Provides executive management for both entities	<ul style="list-style-type: none">• Office consumables• Technology (telecoms, hardware, software and cloud services)• Professional services (eg, accounting and legal)
B4B Solutions Inc.	<ul style="list-style-type: none">• Employs staff in the Philippines• Provides shared services for itself and Clear Marketing Solutions Pty Ltd, including admin, bookkeeping, receivables, payables, marketing and ICT services	<ul style="list-style-type: none">• Office consumables• Technology (telecoms, hardware, software and cloud services)• Professional services (eg, accounting and legal)

SECTION 3

Our Approach to Managing Modern Slavery Risks

Consistent with B4B's Employee Handbook, Clear Admin People and B4B have zero tolerance for any form of slavery-like practices.

As an employer in the Philippines, B4B is subject to a detailed legislative-led oversight framework primarily administered by the Philippines Department of Labor and Employment (DOLE).

The Employee Handbook is a cornerstone of that framework and sets out standards of acceptable behaviour from both employees and B4B itself.

The Philippines labour market is highly regulated and B4B makes priority of ensuring that it complies with its obligations as an employer and ensuring, for example, that all direct and indirect employment payments and benefits, taxes and other amounts (such as government-mandated contributions) are accrued and paid on behalf of its employees.

Accordingly, the managing director of Clear Admin People has directed the development and adoption of this Modern Slavery Policy and the Modern Slavery Reporting Framework for Clear Admin People and B4B.

Compliance with the policy and the reporting framework is overseen by the HR Manager of B4B under the direction of the managing director of Clear Admin People/President of B4B.



SECTION 4

Our Policies & Procedures

Formal policies are in place intended to promote ethical and legally compliant business conduct. Primarily as set out in the B4B Employee Handbook, those policies contribute to our commitment to prevent violations of human rights such as modern forms of slavery in our business.

We have developed our Modern Slavery Policy and the Modern Slavery Reporting Framework to address the specific risk of modern slavery within our business operations and supply chain. These policies will be included in the 2023 revision of the B4B Employee Handbook.

The Modern Slavery Reporting Framework contains the following critical elements:

- Stating our expectation that Clear Admin People and B4B and their suppliers will abide by the standards expressed in the Modern Slavery Policy.
- Committing that we will engage with suppliers throughout our supply chains to support anti-slavery practices.
- Appointing a nominated person to implement and manage the Modern Slavery Reporting Framework.

- Undertaking a risk assessment of our supply chains to identify of suppliers that represent a potential modern slavery risk (by the nature and likely source of their supplies and inputs) and obtain (by way of a due diligence process) evidence that the supplier complies with both the Act (where applicable) and the standards expressed in our Modern Slavery Policy.
- Maintaining a record of such suppliers and details of their compliance with the standards expressed in our Modern Slavery Policy.

We will review those procedural controls on an ongoing basis to ensure robust processes in place to minimise the risk of modern slavery in our operations and supply chain and to comply with the Act.



SECTION 5

Potential Risks Identified In Our Supply Chain

As part of the implementation of our Modern Slavery Reporting Framework, we reviewed our supply chain.

As a result, we identified areas with no or low risk. We also identified potential risks. For example, where a local supplier may source a product, such as IT or communications products from overseas sources, which may have a risk of having modern slavery practices still in place.

We consider this outcome to be consistent with expectations given the nature of our business and the fact that our supply chain utilises a relatively narrow range of business inputs and that the preponderance of those inputs are considered low risk from a modern slavery perspective.

Inherent risk of procured products and services

Product or Service	Risk Categorisation
Telecommunications hardware	Medium
Information technology hardware	Medium
Office equipment and supplies	Medium
Software services	Low
Insurance, accounting, legal and other professional services	Very low
Administration and marketing services	Very low

SECTION 6

Actions Taken to Address Potential Risks; Effectiveness of those Actions

We outline the actions taken to address potential risks in our Modern Slavery Reporting Framework. They include:

- Where the nature and likely source of their supplies and inputs identifies a potential risk, we will undertake a due diligence process in respect of that supplier.

This involves obtaining evidence (via questionnaire and/or via reference to the supplier's own internal process framework) that the supplier complies with both the Act (where applicable) and the standards expressed in our Modern Slavery Policy.

- We will maintain on a register the detail of those suppliers and their compliance with the standards expressed in our Modern Slavery Policy.
- If the supplier is not compliant with the Act (where applicable) and the standards expressed in our Modern Slavery Policy, we attempt to work with the supplier to manage the identified risk.

If an existing supplier has indicated that they are not currently compliant but can become compliant, we will provide a specific period of time for them to demonstrate compliance.

If an existing or prospective supplier is not compliant but can put in place an objectively-assessable risk mitigation program, this may satisfy our requirements for compliance

Prospective suppliers who do not fully co-operate with the due diligence process are not be considered suitable for use.

We may choose to cease further engagement with non-compliant existing suppliers. However, in certain cases, the managing director of Clear Admin People or President of B4B may decide that it is in the entity's best interests to keep engaging with the non-compliant supplier. In this case, we will record:

- The managing director/President's approval of this course of action
- The reason for the decision
- What is being done to manage the modern slavery risk exposure this presents.

As the Modern Slavery Reporting Framework is newly adopted in 2023, we will continue to assess and implement measures to ascertain the effectiveness of actions to address risks. This will be a key focus in 2023 and into 2024 (refer to Section 7).

It is evident that there is a relatively low level of potential risks in our supply chain. We anticipate that risk levels will continue to decline due to the application of the due diligence process in selecting prospective suppliers.

SECTION 7

Future Activities

Over the remainder of 2023 and into 2024, our key focus areas are:

- Refining our Modern Slavery Reporting Framework to ensure it is suitable in identifying and managing modern slavery risks.
- Developing an understanding of the effectiveness of the measures in place to address identified modern slavery risks.
- Engaging with existing suppliers who we have identified as having potential modern slavery risks to ensure that those risks are adequately mitigated and/or managed in accordance with our Modern Slavery Policy.
- Finding alternative suppliers for any identified as having material modern slavery risks.

SECTION 8

Our Policies & Procedures

This Modern Slavery Statement has been approved by the managing director of Clear Admin People (being the principal governing body of Clear Marketing Solutions Pty Ltd). This approval took place by resolution of the managing director on 1 May 2023.

This Modern Slavery Statement is accordingly issued via the signature of the managing director, Robert Connell.


Robert Connell

Managing Director
Clear Marketing Solutions Pty Ltd

SECTION 9

Compliance with the Modern Slavery Act

We have prepared this Statement to meet the reporting criteria set out under the Modern Slavery Act (Cth) 2018. The table below identifies where each criterion is addressed:

S.#	MODERN SLAVERY ACT CRITERIA	SECTION OF STATEMENT
1	Identify the reporting entity	Front cover & Section 8
2	Describe the reporting entity's structure, operations and supply chains	Section 2
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or control	Section 5
4	Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Section 6
5	Describe how the reporting entity assesses the effectiveness of these actions	Section 6
6	Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Sections 3 & 4
7	Provide any other relevant information	Section 7