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Cloudstaff Modern Slavery Statement





Cloudstaff Modern Slavery Statement

June 2023

Cloudstaff Holdings Pty Ltd is a leading outsourcing company that provides businesses with high-quality, cost-effective outsourcing solutions. Cloudstaff Holdings Pty Ltd is the fusion of great people, innovative technology, and a culture that engages our staff and promotes personal and professional growth.

Cloudstaff's goal is to 'help businesses grow'. This is our 'Why statement' and we are dedicated to achieving this goal while upholding a code of ethics and conduct that encourages workplace diversity, environmental awareness, and constructive social change.

Cloudstaff is aware that modern slavery takes various forms, such as slavery, involuntary servitude, forced labor, inhumane treatment, child labor, human trafficking, and all other acts that deprive a person's liberty by another in order to exploit them for personal or commercial gain.

Cloudstaff does not tolerate any form of modern slavery. We actively work to prevent any risk of modern slavery within the business and comply in full with our obligations under applicable laws relating to slavery of all forms in locations where Cloudstaff has existing or future operations.



Our values



Staff

Cloudstaff is committed to ensuring that our staff are valued, respected, and kept safe at all times, without exception.

We encourage both personal and professional development and pay our staff a professional level local salary that allows them to support their families and strive for major investment goals.



Community

We understand the importance of community, and have built and fostered relationships with many local educational institutions and community groups to provide sponsorship, mentorship, and training opportunities.

We are humbled that, in some small way, we have had a positive impact on the communities where we work.



Environment

We care deeply about the environment and believe that all companies, big and small, have an obligation to be responsible corporate citizens.

We have a number of policies in place regarding consumables, power management, and recycling. We are continually looking for ways to reduce the impact we have on the environment.



Equality

Cloudstaff values diversity and rejects discrimination in all forms. We strive to build an inclusive workplace and are committed to equal pay and merit-based hiring.

All staff should feel safe, valued, and accepted. Confidential reporting systems are in place to ensure that everyone's voice can be heard.



Family support

Cloudstaff's family-friendly workplaces offer parents the assistance they need to raise families while still developing their careers.

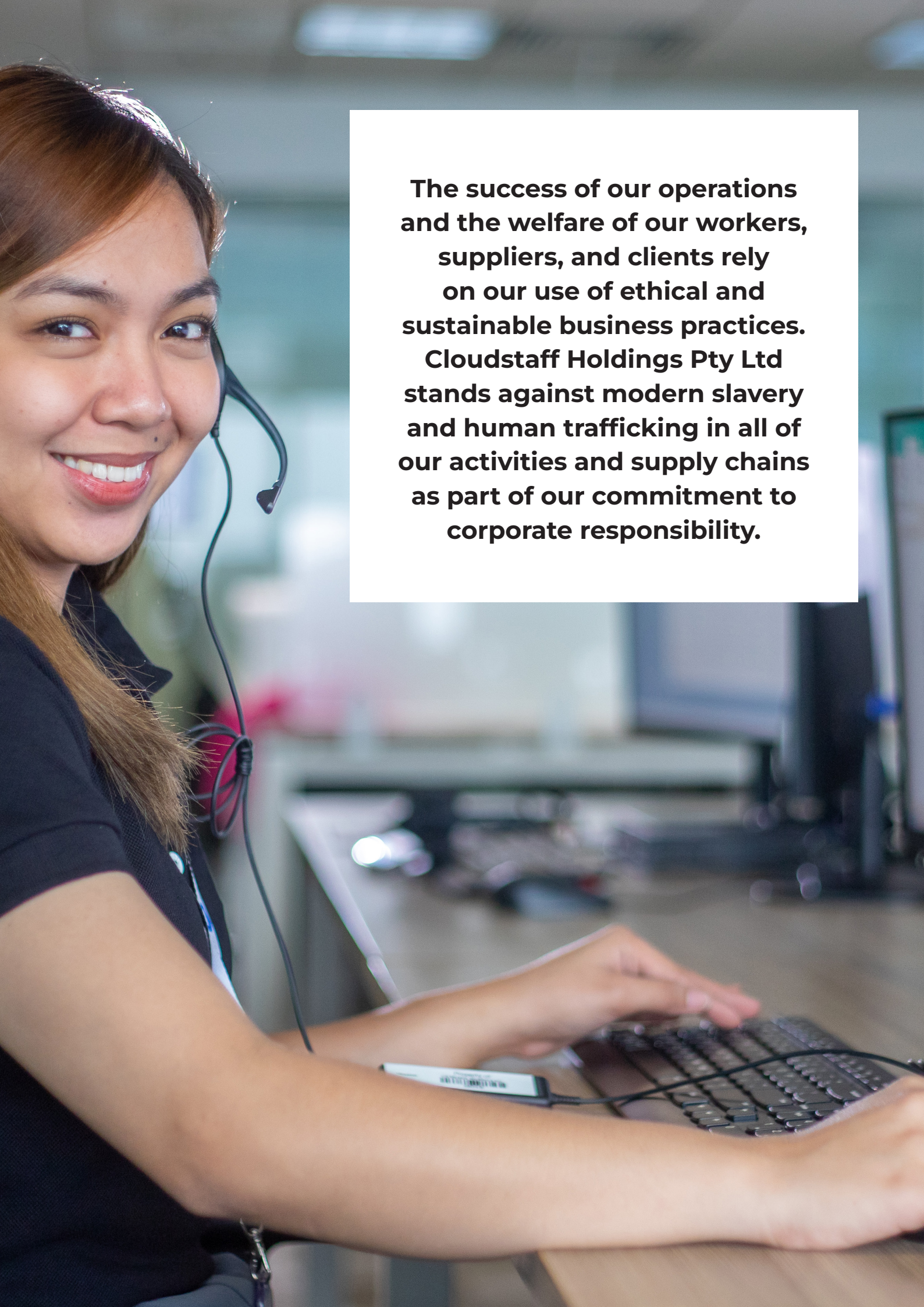
We provide free in-house child care facilities, as well as full maternity and paternity leave. Staff are also encouraged to bring their families to all major company events.



Health & wellbeing

The health and wellbeing of our staff is paramount.

Cloudstaff provides free in-house doctors, nurses and psychology services to all staff. Appointments are made using Cloudstaff Tap, a mobile app designed to keep all of our staff connected.



The success of our operations and the welfare of our workers, suppliers, and clients rely on our use of ethical and sustainable business practices. Cloudstaff Holdings Pty Ltd stands against modern slavery and human trafficking in all of our activities and supply chains as part of our commitment to corporate responsibility.

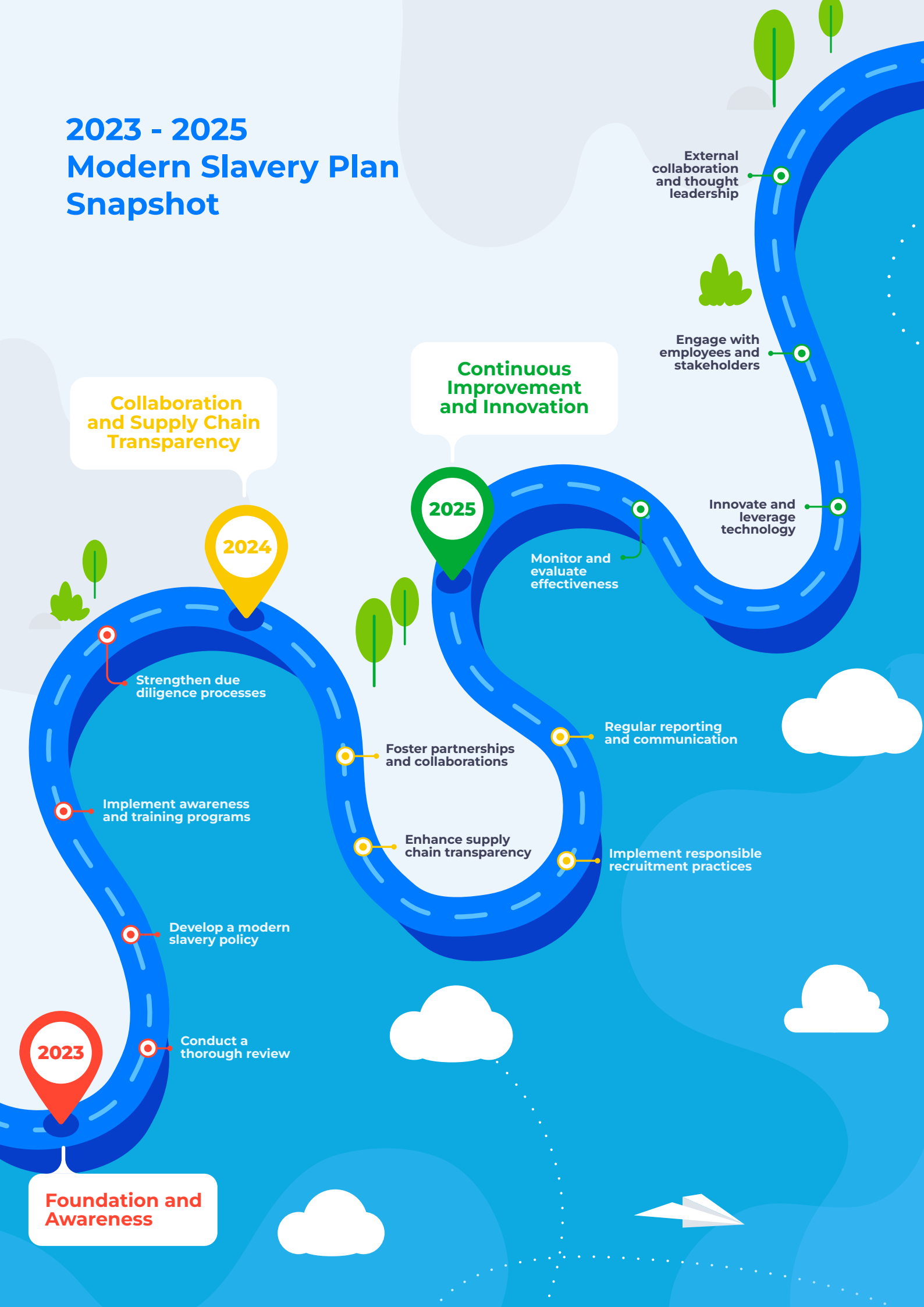
Policy Commitment

In all of our operations and supply chains, Cloudstaff Holdings Pty Ltd is committed to doing its part in stopping modern slavery and human trafficking. This includes a zero-tolerance policy on human trafficking, debt servitude, or forced labor of any kind.

Cloudstaff Holdings Pty Ltd has an obligation to make sure that our business practices prevent such violations and to work alongside our partners and suppliers to eliminate modern slavery within our supply chains.



2023 - 2025 Modern Slavery Plan Snapshot



2023 - 2025 Modern Slavery Plan

The objective of this plan is to enhance Cloudstaff Holdings Pty Ltd responses to modern slavery by implementing comprehensive measures and initiatives over the next three years.

The plan focuses on prevention, detection, and response to modern slavery within Cloudstaff Holdings Pty Ltd's operations and supply chain and builds on the previous preparatory plan.

2023 Foundation and Awareness

Conduct a thorough review

- a. Continue to assess the risk of modern slavery within Cloudstaff Holdings Pty Ltd operations and supply chain.
- b. Identify potential areas of vulnerability and high-risk activities.
- c. Continuously review existing policies, procedures, and supplier contracts for modern slavery prevention.
- d. Ensure compliance with relevant legislation, such as the Modern Slavery Act in Australia and other relevant jurisdictions.

Develop a modern slavery policy

- a. Refine the comprehensive policy statement that reflects Cloudstaff Holdings Pty Ltd's commitment to combating modern slavery in all jurisdictions.
- b. Include definitions, principles, and guidelines for all employees, suppliers, and contractors.
- c. Ensure the policy aligns with international standards and best practices.

Implement awareness and training programs

- a. Conduct ongoing mandatory training sessions for all employees to raise awareness about modern slavery.
- b. Provide specific training for employees involved in procurement, supply chain management, and recruitment.
- c. Develop training materials, including case studies and scenarios, to enhance understanding and identification of modern slavery indicators.

Strengthen due diligence processes

- a. Enhance supplier onboarding procedures to include modern slavery risk assessments.
- b. Implement regular supplier audits to assess compliance with modern slavery prevention requirements.
- c. Develop a system to monitor suppliers' ongoing commitment to eradicating modern slavery.

2024

Collaboration and Supply Chain Transparency

Foster partnerships and collaborations

- a. Engage with industry organizations, NGOs, and other stakeholders to share best practices and knowledge.
- b. Collaborate with suppliers, contractors, and clients to promote a collective approach to combating modern slavery.

Enhance supply chain transparency

- a. Develop a system to map Cloudstaff Holdings Pty Ltd's supply chain globally, identifying high-risk areas and potential vulnerabilities.
- b. Conduct risk assessments of suppliers and contractors, prioritizing those with high spend in high-risk regions or industries.
- c. Encourage suppliers to disclose their own efforts in combating modern slavery.

Implement responsible recruitment practices

- a. Establish guidelines for fair and ethical recruitment processes globally, ensuring the protection of workers' rights in all jurisdictions
- b. Implement due diligence procedures to verify the compliance of external recruitment agencies and subcontractors and internal recruiters.

Regular reporting and communication

- a. Prepare and publish annual modern slavery statements for all jurisdictions detailing Cloudstaff Holdings Pty Ltd's actions and progress.
- b. Communicate with stakeholders, including employees, clients, and shareholders, to raise awareness and demonstrate commitment.

2025

Continuous Improvement and Innovation

Monitor and evaluate effectiveness

- a. Establish key performance indicators (KPIs) to measure the effectiveness of modern slavery prevention initiatives.
- b. Regularly review and assess progress towards meeting KPIs.
- c. Identify areas for improvement and make necessary adjustments to policies and procedures.

Innovate and leverage technology

- a. Explore emerging technologies, such as artificial intelligence and blockchain, to enhance supply chain transparency and traceability.
- b. Consider implementing digital tools or platforms that can facilitate risk assessments, data analytics, and supplier monitoring.

Engage with employees and stakeholders

- a. Conduct regular surveys or feedback sessions to gather insights and suggestions from employees.
- b. Actively involve employees in the development and improvement of modern slavery prevention initiatives.

External collaboration and thought leadership

- a. Participate in industry forums, conferences, and working groups to share Cloudstaff Holdings Pty Ltd's experiences and learn from others.
- b. Contribute to thought leadership by publishing articles, whitepapers, or case studies on modern slavery prevention.
- c. Engage with academic institutions and research organizations to support research efforts and contribute to the development of best practices.
- d. Actively participate in public consultations and policy discussions related to modern slavery to influence legislative and regulatory frameworks.
- e. Collaborate with NGOs and advocacy groups to address systemic issues and contribute to collective efforts in combating modern slavery.
- f. Seek partnerships with external organizations to drive innovation and develop new approaches to modern slavery prevention.

By following this three-year plan, Cloudstaff Holdings Pty Ltd can strengthen its responses to modern slavery, promote transparency, and create a culture of awareness and vigilance throughout its operations and supply chain.

This plan will help Cloudstaff Holdings Pty Ltd align with global best practices, meet legal obligations, and contribute to the global fight against modern slavery.

The plan will be formalized with detailed deliverables and timelines for each year in October of the previous year.



Message from the CEO and Board

Cloudstaff Holdings Pty Ltd is committed to actively combating modern slavery and human trafficking in all aspects of our operations and supply chains. As an ethical and responsible company, we recognize the importance of ensuring that our activities do not contribute to these heinous offenses.

We firmly believe that it is our responsibility to work collaboratively with our partners and suppliers to eliminate modern slavery from our supply networks.

Modern slavery can manifest in many forms. Unfortunately, these grave human rights violations persist across industries and countries, necessitating collective action.

At Cloudstaff Holdings Pty Ltd, we have implemented robust processes to monitor and assess our vendors and suppliers. We have established clear objectives for incident reporting, employee and supplier training, as well as supplier audits.

We are committed to regularly reviewing and evaluating the effectiveness of our policies, procedures, and modern slavery declaration. Should the need arise, we will revise this statement and ensure that our stakeholders, suppliers, and employees are promptly informed of any changes.

It is crucial to emphasize that eradicating modern slavery is not only an ethical imperative but also a sound business practice. Our clients rightfully expect us to operate in an ethical and responsible manner. By prioritizing our dedication to combating modern slavery, we can build trust and instill confidence among our stakeholders. Together, let us actively contribute to the fight against modern slavery and create a more just and equitable world.



Sincerely,
Lloyd Ernst

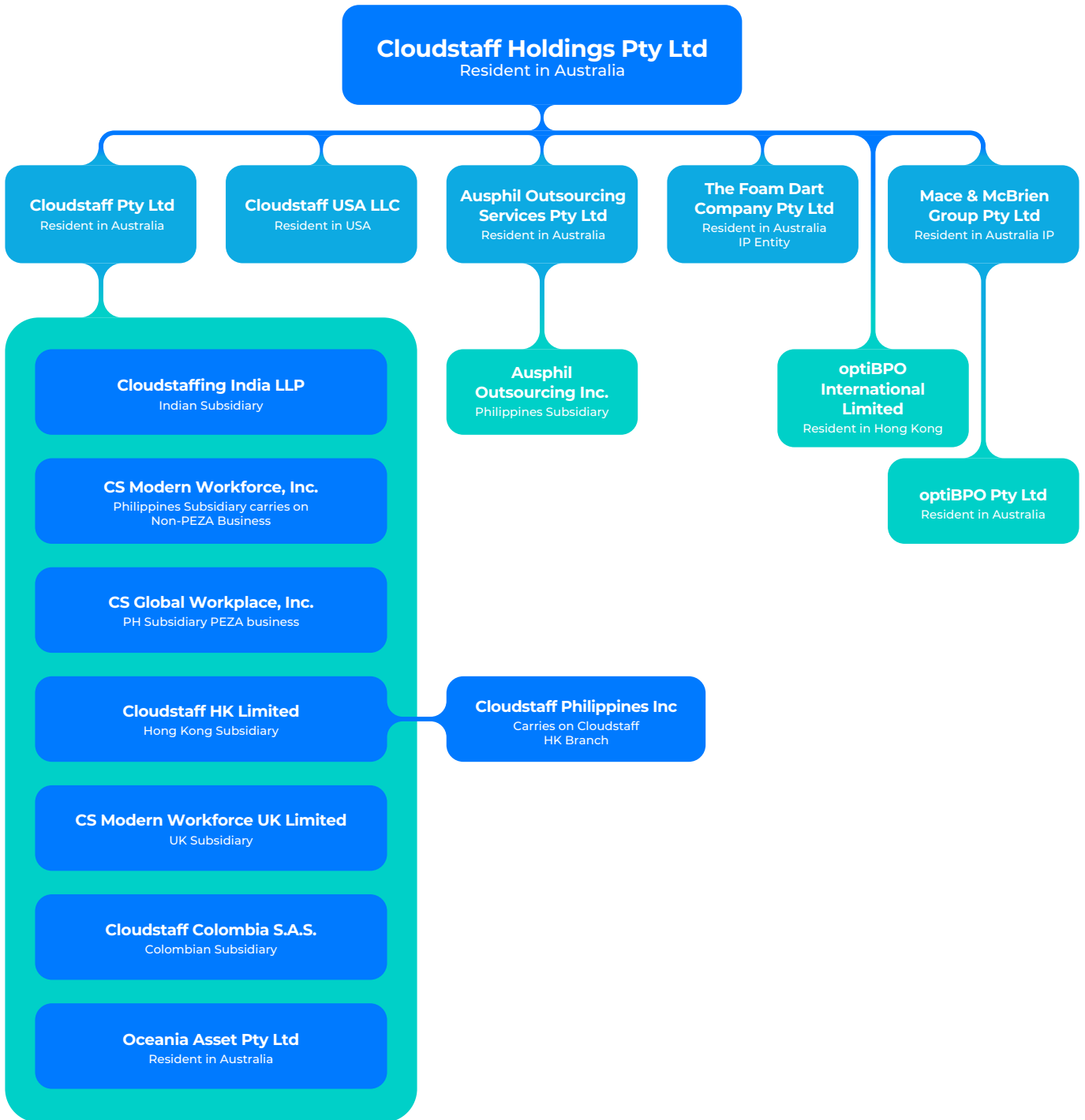


Reporting Criteria

Reporting Criteria 1 and 2

A structure diagram for Cloudstaff Holdings Pty Ltd and its subsidiaries has been provided below for ease of reference.

Organization Structure



The Operations

What We Do

Outsourcing Services

- » Real Estate
- » Accounting
- » IT Support
- » Collections
- » Software QA
- » eCommerce
- » Development
- » Back Office
- » Other industries

Services Offered

- » Hiring staff members for clients
- » Productivity and management tools
- » Office workspaces
- » Workstations
- » Software
- » Connectivity
- » Security
- » Business continuity
- » Account managers
- » Success managers

Internal Hub Services

- » Recruitment
- » Sales
- » Account management
- » Human resources
- » Information technology
- » Network
- » Facilities
- » Other internal services

Where We Do It



Australia



United States



United Kingdom



Philippines



India

How We Manage Modern Slavery Risks



Modern Slavery Group



Education and training of staff and suppliers



Supplier survey and risk identification

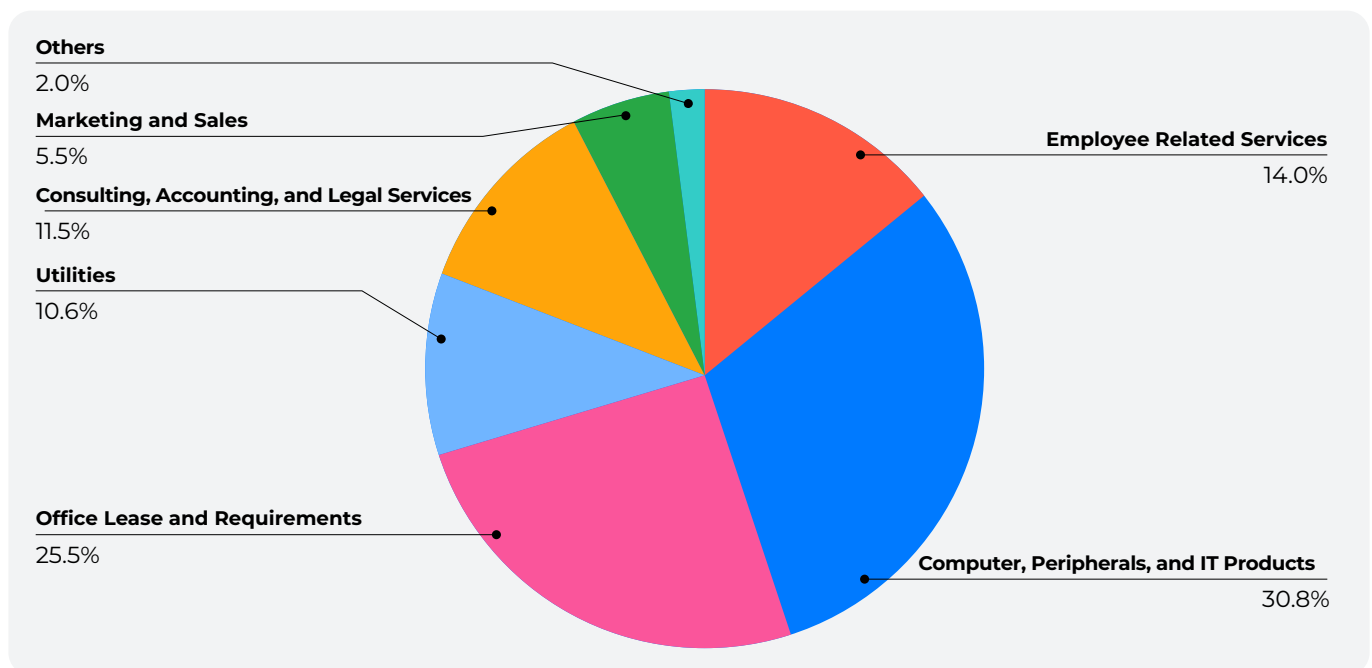
Our Supply Chain

As Cloudstaff Holdings Pty Ltd is an outsourcing company, our direct supply chain consists primarily of:

- » Computer, Peripherals and IT Products
- » Office Lease and Requirements
- » Employee Related Services
- » Consulting, Accounting, and Legal Services
- » Marketing and Sales
- » Others

In 2022, Cloudstaff Holdings Pty Ltd had over 200 accredited suppliers to support our operations and had total expenditure of more than \$30 Million AUD. Cloudstaff Holdings Pty Ltd has established long-term relationships with our suppliers, the majority of which are located in the Philippines.

Cloudstaff Holdings Pty Ltd Expenditure for 2022



Reporting Criteria 3

Modern Slavery Risk in Operation and Supply Chain

Operational Risk

As a responsible business, Cloudstaff Holdings Pty Ltd understands the significance of recognizing and minimizing operational risks, including the risk of modern slavery. Due to our policies and practices that support ethical hiring procedures, competitive pay, the prevention of harassment, bullying, and discrimination, and the provision of a workplace free from such practices, Cloudstaff Holdings Pty Ltd considers that its business operations have a very low risk of exposure to modern slavery. Additionally, we are dedicated to developing sustainable communities, respectfully and honestly communicating with all of our partners, and maintaining appropriate transparency with regard to our modern slavery due diligence process with all of our employees, clients, suppliers, and stakeholders.

Promoting Fair Employment Policies: Cloudstaff Holdings Pty Ltd makes sure that all of its operations in all jurisdictions adhere to fair employment policies. Equal employment opportunities must be offered to all workers, regardless of their race, gender, religion, or nationality. Cloudstaff Holdings Pty Ltd makes sure that it selects new recruits based on their credentials, expertise, and experience.

Fair and Competitive Pay: Cloudstaff Holdings Pty Ltd is committed to providing its staff with a fair and competitive wage that is appropriate for their education, training, and experience. To keep it fair and competitive, Cloudstaff Holdings Pty Ltd analyzes its salary policies on a regular basis.

Providing a Safe Workplace: Cloudstaff Holdings Pty Ltd makes sure that all of its employees are able to do their jobs in a secure setting. To prevent accidents and injuries at work, the organization offers all of its employees the necessary OSH (Occupational Health and Safety) Training.

Preventing Harassment, Bullying, and Discrimination: Harassment, bullying, and discrimination are all prohibited at Cloudstaff Holdings Pty Ltd. The business offers a work environment that is free of all forms of harassment and discrimination. Cloudstaff Holdings Pty Ltd makes sure that each employee is given respect and dignity.

Building Sustainable Communities: Cloudstaff Holdings Pty Ltd is dedicated to fostering local economic growth and community development by creating jobs and business possibilities locally. The business thinks that this will not only help the neighborhood but also help its operations succeed in the long run.

Risk Reduction for Modern Slavery: Cloudstaff Holdings Pty Ltd actively works to reduce the possibility of modern slavery in its operations and supply chain. This entails locating weak spots, keeping an eye on labor hire and outsourced service providers, and making sure the proper amount of due diligence is done.

Enhancing Data Insights: To more accurately gauge the efficacy of its current modern slavery risk methodology, Cloudstaff Holdings Pty Ltd is committed to improving its data insights.

Cloudstaff Holdings Pty Ltd feels that by doing this, it will be better equipped to make judgments and take effective action in the effort to reduce the risk of modern slavery and get rid of it.

An internal audit program is also used to ensure the effectiveness and compliance of our risk management system and policies related to modern slavery.

There are some vulnerable areas in our operations, including the employment of labor-hire contractors and outsourced services like catering, security, and facilities management, even though the possibility of us committing or contributing to occurrences of modern slavery is low.

Supply Chain Risk

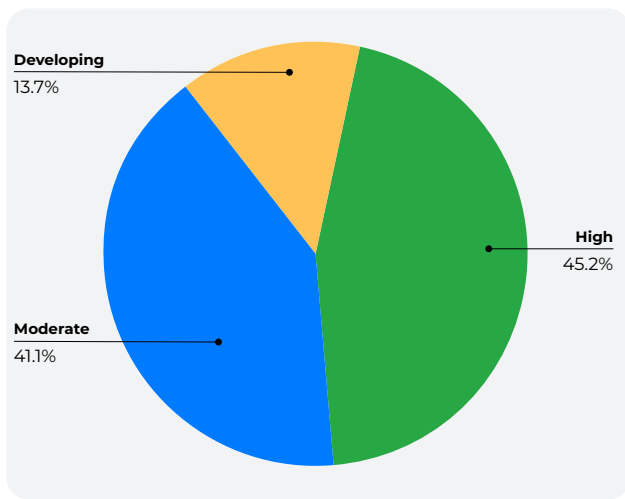
We do a risk assessment of our suppliers as part of our efforts to combat modern slavery, and the results are as follows (with 82% of answers gathered):

Lack of Supply Chain Visibility

As a result of this, finding and preventing instances that involve modern slavery may be challenging for suppliers.

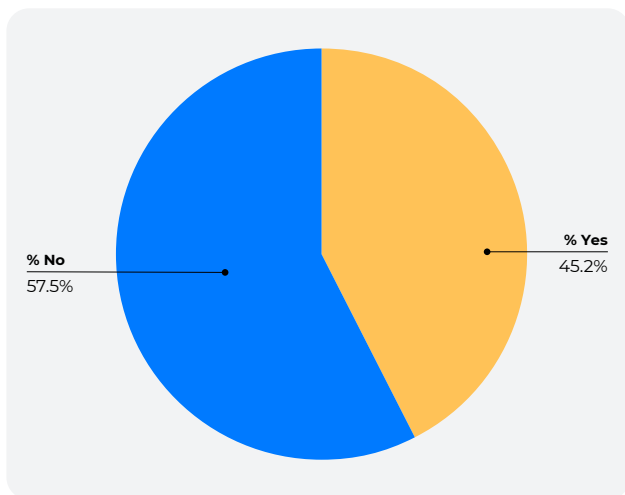
According to our assessment of our suppliers, 13.7% have developing visibility across their supply chain, 41.1% have moderate visibility, and 45.2% have high visibility.

Organization Visibility



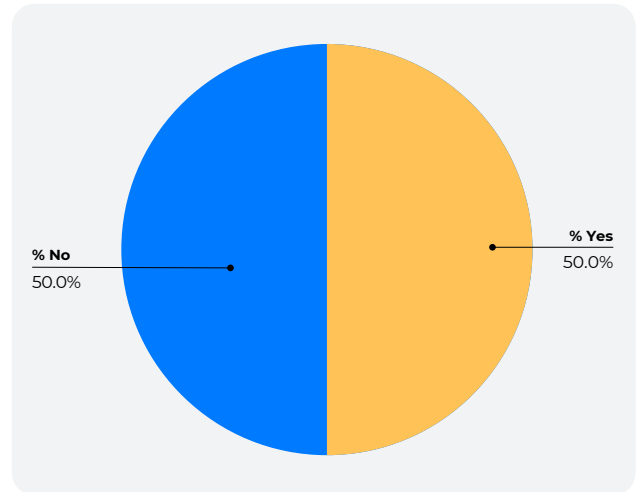
The effectiveness of internal audits and evaluations performed by suppliers to ensure compliance with any corporate policies against modern slavery was assessed. According to the findings, 57.5% of the suppliers are not conducting audits.

Audits and Assessments



When it comes to identifying, eliminating, and mitigating concerns related to modern slavery (or any other associated company policy) and poor working conditions in its operations and supply chains, suppliers have been asked about their due diligence activities.

Other Due Diligence Activities

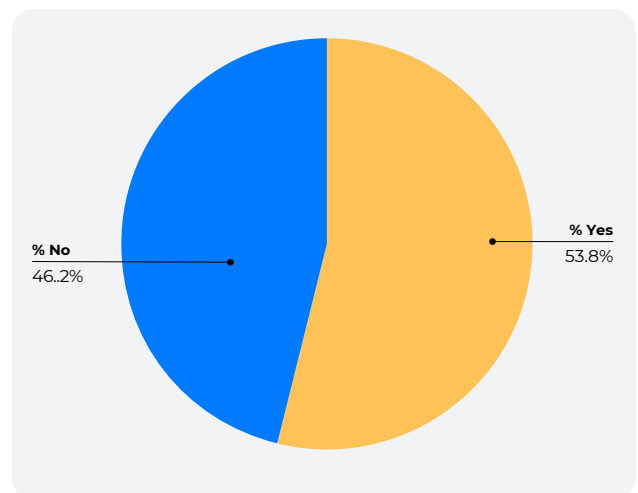


Inadequate supplier assessments:

It may be challenging to identify modern slavery if suppliers fail to perform adequate assessments of the working conditions of their suppliers.

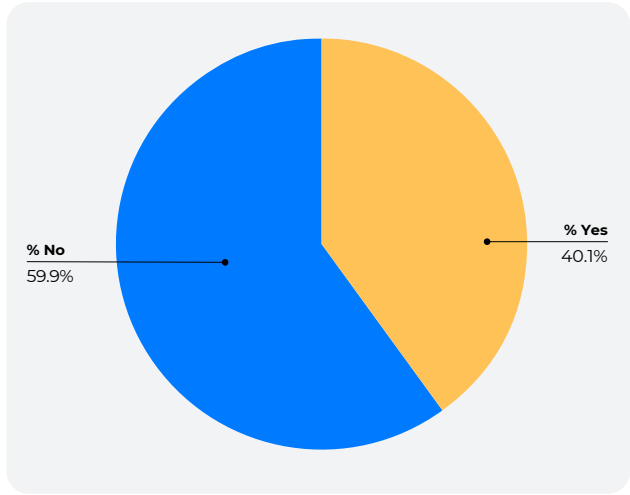
According to our evaluation, 46.2% of our suppliers are not researching the past histories of their suppliers to determine if they've ever engaged in any modern slavery activities.

Background Checks



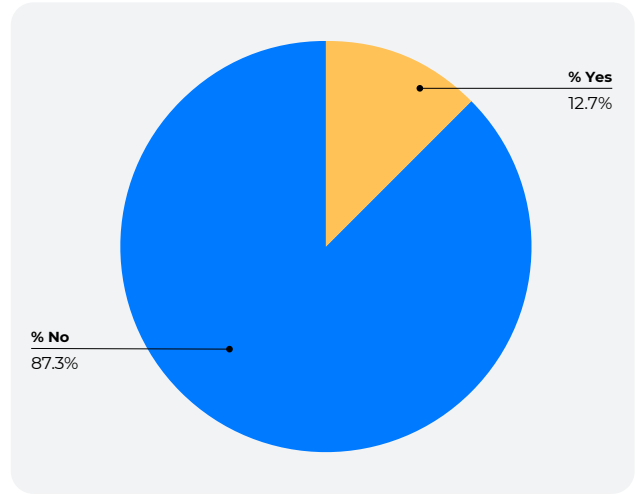
Suppliers might not have adequate procedures or policies in place for employees to report instances of modern slavery or to effectively respond to these reports.

Policies and Procedures



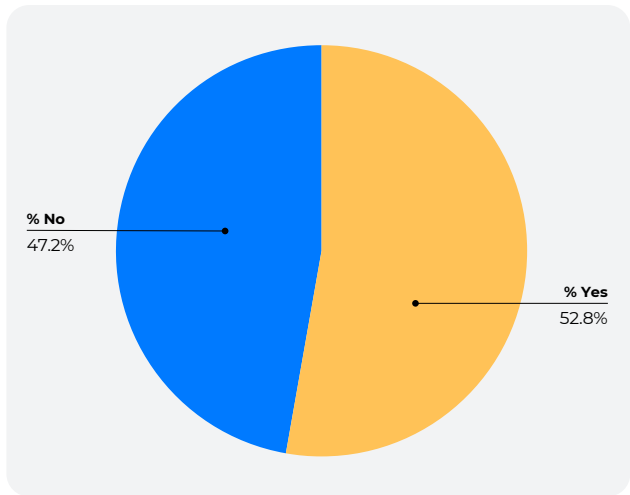
Suppliers were asked if they had terminated a supplier due to concerns related to modern slavery (or any other related company policy).

Termination of Violators



Suppliers were asked if they educate their employees and suppliers on the risk of modern slavery (or any other relevant corporate policy) and the necessary steps to prevent it.

Training and Education



Reporting Criteria 4

Actions Taken to Assess and Address Risk

In 2022, Cloudstaff Holdings Pty Ltd's goal was to provide a start-up and understanding of potential modern slavery risks in our operations and supply chain.

By putting these strategies into effect, Cloudstaff Holdings Pty Ltd can assist its suppliers in recognizing and mitigating cases of modern slavery in their operations, promoting ethical standards for work, and assisting to create a more sustainable and accountable supply chain.

Below are the activities and steps made:

- » Creation of anti-modern slavery groups and identifying their responsibilities.
- » Provide training and awareness to staff and suppliers.
- » Conduct audits and evaluations of suppliers to ensure any instances of modern slavery will be reported.
- » Implementation of anti-modern slavery and human rights policy to Cloudstaff Holdings Pty Ltd.

Training and Awareness

We believe that the best way to stop human trafficking and modern slavery is through education and awareness. We regularly train our staff members, vendors, and contractors on this subject matter as well as our standards and guidelines.

All of our staff members are encouraged to identify any concerns or suspicions they may have relating to the likelihood of modern slavery taking occurring within our business or supply chains.

Supplier Survey and Risk Identification (Key Performance Indicators)

We are dedicated to keeping records on and assessing the success of our efforts to prevent modern slavery. For incident reporting, employee and supplier training, and supplier audits, we have set measurable targets.

To make sure that we continue to fulfill our commitments and duties, we will annually assess our performance and make any improvements that are required to our processes and procedures.



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you an awesome offshore team that will increase your profitability and help grow your business.



Innovation



Get pricing

Reporting Criteria 5

Review and Evaluation

Our modern slavery statement along with the effectiveness of our policies and procedures, will be reviewed and evaluated on an annual basis. We will revise this statement if necessary and let our stakeholders, suppliers, and staff members know about any changes.

Target for Year 2022

Target	Complete
Create anti-modern slavery group	✓
Create a three-year project plan	✓
Perform supplier identification and risk identification	✓
Conduct supplier survey	✓
Create educational and training material	✓

Reporting Criteria 6

The controlled entities share the same executive management and are all managed and directed by Cloudstaff Holdings Pty Ltd.



Conclusion and Contact Information

In all of our operations and supply chains, Cloudstaff Holdings Pty Ltd is committed to doing what it can to identify and combat modern slavery. We are committed to preventing modern slavery, we acknowledge that this is a never-ending process and continuous improvement process for our organization.

If you have any queries, feedback, or wish to report any suspected cases of modern slavery, please don't hesitate to reach out to us at legal@cloudstaff.com.

Annexure A

Cloudstaff Holdings Pty Ltd	ACN 613 909 809
Cloudstaff Pty Limited	ACN 107 400 699
Cloudstaff USA LLC	
Ausphil Outsourcing Services Pty Ltd	ACN 615 344 673
The Foam Dart Company Pty Ltd	ACN 624 958 345
Mace & McBrien Group Pty Limited	ACN 145 249 127
optiBPO International Limited	
Cloudstaffing India LLP	
CS Modern Workforce, Inc.	
CS Global Workplace, Inc.	
Cloudstaff HK Limited	
CS Modern Workforce UK Limited	
Cloudstaff Colombia SAS	
Oceania Asset Pty Ltd	ACN 095 878 032
Cloudstaff Philippines Inc.	
Ausphil Outsourcing Inc.	
optiBPO Pty Ltd	ACN 600 126 056


Modern Slavery Act 2018 (CTH) Statement Annexure

Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of Cloudstaff Holdings Pty Ltd as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 30 June 2023.

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of Cloudstaff Holdings Pty Ltd. as defined by the Act2.



Lloyd Ernst

Mandatory criteria

a. Identify the reporting entity.	13
b. Describe the reporting entity’s structure, operations and supply chains.	13-15
c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	16-18
d. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	19
e. Describe how the reporting entity assesses the effectiveness of these actions.	21
f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	21
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	22-23

It ought to concern every person, because it is a debasement of our common humanity. It ought to concern every community, because it tears at our social fabric. It ought to concern every business, because it distorts markets. It ought to concern every nation, because it endangers public health and fuels violence and organized crime. I'm talking about the injustice, the outrage, of human trafficking, which must be called by its true name - modern slavery.

Barack Obama



