

Stellar Modern Slavery & Human Trafficking

Statement



Mandatory Criteria 1: Scope

This Statement outlines the actions undertaken by Stellar Asia Pacific Pty Ltd (ACN 082 618 148) (“Stellar”; “the Company”) to identify and mitigate the risk of modern slavery and human trafficking across its business and supply chain.

This Statement covers Stellar’s financial year ending 31 December 2020.

This statement is aligned with the requirements outlined in the *Australian Modern Slavery Act 2018* (Cth).

Mandatory Criteria 2: Our Business

Stellar’s expertise lies in the end-to-end customer journey, delivering an outsourced customer experience offering informed by research, decades of experience and state-of-the-art technological solutions. Named Outsourcer of the Year for the last seven years running by Frost & Sullivan.

Stellar is a privately-held company that directly employs over 5,000 people globally, based at locations across Australia, the Philippines, the USA and South Africa delivering services for a diverse client base spanning a broad range of industries.

Stellar controls the following entities, which are covered by this report: Stellar Philippines Inc., Stellar Relay LLC (USA) and Stellar South Africa (Pty) Limited.

Stellar’s supply chain consists of products and services purchased directly by the Company in Australia and overseas. This includes the suppliers of products and services used in its contact centre operations, including cleaning services, office equipment and consumables, telecommunications services, construction and fit-out services and IT equipment.

In addition, Stellar supply chain extends to products and services procured by Stellar Relay LLC (USA) and Stellar South Africa (Pty) Limited to support contact centre activities in those locations.

Finally, the supply chain extends to services procured by the Company from Stellar Philippines Inc., which in turn procures goods and services for its contact centre activities.

Stellar prides itself on its sense of community, which is founded upon an Open Book Management approach and the core business values of Respect, Integrity, Transparency, Fun and Innovation.

Diversity and inclusion is a key part of Stellar’s success and is highly regarded throughout all levels of the business.

Stellar supports all regardless of any differences, to foster a sense of belonging through trust, safety and acceptance. Stellar aims to create an environment where all can come to work, be safe and help others be safe.

It is of the utmost importance to Stellar that its suppliers, or prospective suppliers, across these locations also do not condone, nor are involved in, any modern slavery and human trafficking practices.

Mandatory Criteria 3: Modern Slavery Risks in Stellar's Supply Chain

Stellar is committed to human rights and understands its greater role in society to work towards the global elimination of modern slavery and human trafficking.

Stellar continues to commit to the wellbeing of all employees and associated suppliers and does not condone extreme labour rights abuses and any unethical behaviour defined as a modern slavery and human trafficking practice.

Stellar does not take this matter lightly and is taking the steps to address any risks of modern slavery and human trafficking within its supply chain and the business as a whole.

Stellar has scoped out the risks within its supply chain and considers the following as potential modern slavery risks:

- Employment and labour management arrangements utilised by third-party cleaning and security contractors across all geographies in which Stellar operates;
- Employment and labour management arrangements utilised by third-party construction, maintenance and fit-out contractors across all geographies in which Stellar operates;
- Products used in Stellar operations (such as telephone headsets) being produced in a high-risk location for unethical manufacturing practice

Stellar is primarily concerned that its practices not contribute to modern slavery practices, which has informed its approach to addressing and managing those risks.

Stellar's objectives to address these risks within its business are to have:

- Confidence in a secure supply chain, including Stellar's suppliers' supply chains, that is free of modern slavery and human trafficking practices
- Effective procurement processes & governance
- Auditing and reporting processes in place to identify and investigate modern slavery and human trafficking risks
- Continuous improvement plans and checkpoints
- Self-reporting to customers advising of Stellar's compliance

Mandatory Criteria 4: Key Areas of Action in FY20

Stellar undertook the following actions during the reporting period to assess and address the risks of modern slavery and human trafficking practices within Stellar and its supply chain.

- Briefed the CEO of Stellar regarding the Modern Slavery regime and the obligations on Stellar, including creating a Modern Slavery Action Plan
- Reported on the Modern Slavery regime obligations to the Stellar Board
- Mapped operations and supply chain, including assessing industry sectors and geographies to determine areas of highest risk of modern slavery
- Developed a supplier audit fact sheet checklist of identified risks and supplier survey questionnaire, comprising 22 questions, which was sent to 31 suppliers in the cleaning and security industries
- Drafted a supplier Code of Conduct
- Updated the Company Code of Conduct to incorporate information on risks of modern slavery and human trafficking practices
- Defined a reporting and management process if/when issues are identified, including drafting a reporting process with flow chart process for whistle-blowers to raise concerns
- Modern Slavery Action plan and resources available on internal intranet page
- Communicated where updated policies and materials can be located
- Loaded key process FAQ's into internal Virtual Agent (Ella)
- Companywide announcement of actions and planned response at global meeting
- Internal polling surveys to measure staff understanding

Mandatory Criteria 5: Effectiveness of actions

Stellar's key action during the reporting period has been to investigate and map its supply chain. Stellar has also worked to educate suppliers, educate managers and staff, and build trust between the entities that Stellar controls.

The following measures indicate how Stellar assessed the effectiveness of actions undertaken during the reporting period to address the risks of modern slavery and human trafficking practices within Stellar and its supply chain:

- 23 of the 31 suppliers to whom the supplier survey was sent responded to the survey and engaged with Stellar.
- The internal Virtual Agent system utilised to report on queries and questions from employees related to Modern Slavery. One query from June 2020 to December 2020 was reported.
- An internal education poll, released on Stellar's internal social platform "Workplace", to coincide with the International Day for the Abolition of Slavery on 2 December 2020 was seen by 892 employees. 45 employees responded to the poll, which checked for the effectiveness of education and understanding of topic of Modern Slavery.

Mandatory Criteria 6: Reporting Entity Consultation

Stellar geographic footprints are in the Philippines, South Africa and USA. The entities in these regions are controlled by Stellar.

Procurement team members within these entities were consulted on Stellar's investigation process, due diligence requirements under the legislation and the reporting requirements to the Australian Government, via the following steps:

- **Heat mapping techniques** were used to identify risks of modern slavery practices by geography and supplier industry. From this process cleaning and security industries were identified as being most at risk.
- **Input and advice** was sought from procurement team members as to how best to engage with suppliers in geographies outside of Australia.
- **Procurement and supplier contractual processes** in controlled entities were analysed and a supplier code of conduct, educational factsheet and checklist were drafted for review.
- **A supplier survey** was conducted to investigate risks within Stellar's global supply chain and educate on responsibilities to act and prevent risks of modern slavery practices.
- **Educational resources, plans and actions** were communicated at global Stellar meetings and made accessible via internal resource and social platforms.
- **External legal advice** was sought during this process to ensure due diligence.



Mandatory Criterion 7: Any other relevant information

Future modern slavery statements covering Stellar's operations will be included in the Probe Group's statement, commencing with the statement for the period ending 30 June 2021 following the acquisition of Stellar by the Probe Group. From December 2020 Stellar will be operating under the Probe brand.

Approval

This statement has been approved by the Probe Group Board.

A handwritten signature in black ink, appearing to read "AH", is positioned above the name of the signatory.

Andrew Hume, Probe Group Chief Executive Officer

26th February 2021