

# MODERN SLAVERY STATEMENT



By: International SOS (Australasia) Pty Ltd  
December 2020

# Modern Slavery Statement

This statement is made by International SOS (Australasia) Pty Ltd ABN 83 052 247 104 ('International SOS') in compliance with the legal requirements set out in the Modern Slavery Act 2018 (Cth) (the 'Act').

The International SOS Group is the world's leading health and security services Group with over 10,000 employees working in 1,000 locations in 85 countries. We were founded on the principle of putting the patient first and this is still true today. Led by 5,200 medical professionals and 200 security specialists our teams work night and day to find solutions to protect our clients' global workforce in whatever situation they may be facing; we assess, advise and assist from a health, security and logistical perspective to protect our client's workforce internationally through providing invaluable local knowledge and expertise on a global scale. International SOS is a wholly owned affiliate of the International SOS Group.

## Summary

Modern slavery is a human rights issue that sadly exploits millions of people globally. International SOS abhors modern slavery, which is completely contrary to all we stand for. We are in the business of saving lives, and are committed to our responsibility to avoid participating, either directly or indirectly, in modern day slavery. Modern day slavery has no place in our company or in our supply chain.

Our services generally involve the provision of medical, health and security services to employees of our customers. These services are delivered by highly qualified professionals, supported by highly trained assistance centre staff, on a global basis. The nature of our professional service offerings is antithetical to modern slavery within our organization, as we rely on a highly educated and motivated employee base to fulfil our service offerings.

The International SOS Group's latest [Sustainability Progress Report](#) provides more information about the ethics, values and goals of International SOS.

International SOS supports the principles of the Act because it not only raises awareness of this issue, but is a crucial step in eradicating the abhorrent practice of modern slavery. Our statement communicates our efforts to meet (and where possible exceed) the requirements of the Act .



Ian Gilbert

Director of International SOS (Australasia) Pty Ltd

## **Mandatory Criteria 1. Reporting Entity**

This statement covers Australian registered entities that are related body corporates to International SOS within the meaning of the Corporations Act 2001 (Cth). Whilst each Australian registered entity operates as a separate legal entity with its own management team, each of these entities is covered by International SOS' policies, and particular reference is made to the International SOS Group's [Sustainability Progress Report](#) which is issued annually and covers our commitment to embedding our standards and behaviours.

The Modern Slavery risks and impacts associated with projects that International SOS does not operate are not covered by this statement. However, we engage regularly with our joint venture partners on key issues affecting outcomes, including human rights.

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

International SOS is part of the International SOS Group, which is the world's leading health and security services Group with over 10,000 employees working in 1,000 locations in 85 countries. The ultimate parent holding company of International SOS is AEA International Holdings Pte Ltd, which is incorporated in Singapore and operates under Singaporean Law. In Australia, the registered office for International SOS (Australasia) Pty Ltd is Level 4, Building B, 4 Drake Avenue, Macquarie Park, 2113, New South Wales, Australia, which has either employed or outsourced staff with a peak in excess of 4,000 staff across the region. More than 70% of our staff have more than one year's employment experience with International SOS and 94% of our staff have accepted two or more deployments with International SOS and are required as part of their employment to comply with our policies and procedures.

International SOS engages in the business of providing services to reduce its clients' exposure to health, wellbeing and security risks. We generally do not subcontract our services, however, where appropriate, we refer customers to a network of third party providers to provide medical and security assistance. Such third party providers are generally requested to use International SOS' policies and proprietary procedures, and are requested to contractually agree to comply with the International SOS Code of Conduct and Ethics.

International SOS is committed to protecting its corporate reputation as a trustworthy, ethical Group so that we can continue to safeguard our clients, their employees and the employees of third party service providers and so prosper as a Group.

## **Mandatory Criteria 3. Risks of Modern Slavery in our Operations**

International SOS continually assesses the risks of modern slavery in our Operations.

We are strictly against causing, contributing or being directly linked to modern slavery practices. International SOS has a comprehensive set of policies and process that contribute to enabling our business and our employees to identify and mitigate any risks related to modern day slavery. These include policies on Code of Conduct and Ethics, Individual Rights, Safeguarding of Children and Vulnerable Adults and Whistleblowing (further discussed below), which are available on our corporate website. Our employees are required to adhere to these policies and receive training and induction in relation to all relevant International SOS policies and procedures.

## **Mandatory Criteria 4.            Actions we have taken to Assess and Address Modern Slavery Risks**

International SOS has a comprehensive set of policies and process that contribute to enabling our business and our employees to identify and mitigate any risks related to modern day slavery.

### ***Due Diligence***

At International SOS, we do not, under any circumstances use forced, bonded or child labour in the provision of our services. In addition, we make every effort to ensure that our suppliers and service providers operate with the highest level of integrity and are free of the use of forced, bonded or child labour.

In Australia, we monitor our suppliers and service providers very closely to ensure that they comply with the highest level of ethical standards. To ensure that our suppliers and service providers deliver the same high levels of professional excellence and safeguarding, we will continue to do risk based audits. Where appropriate, we include provisions in our contractual agreements that require our counterparties to commit to the prevention of modern slavery.

When International SOS engages with a supplier or service provider, we assess their suitability to provide us with goods and services. Included in this assessment is a risk assessment that considers if they are providing services from countries with a high risk profile for slavery and whether the services or goods provided are from a low skilled staff group or identified based on the high risk in accordance with the Home Office 'A Typology of Modern Slavery Offences in the UK (2017)' report.

Where a supplier or service provider is considered high risk, we may require further evidence of their due diligence processes to prevent modern slavery. In addition, we monitor our suppliers and service providers closely to ensure that they comply with the highest levels of ethical standards.

### ***Code of Conduct and Ethics***

International SOS attaches great importance to the honest and ethical conduct of our employees, our clients and our suppliers and service providers. This commitment is underpinned by our Code of Conduct and Ethics, which sets out principles enabling our business to operate in a safe, honest and responsible manner. At International SOS, our employees demonstrate core corporate values including passion, expertise, respect and care, and our Code of Conduct and Ethics ensures we put the interest of our clients and members first to make a real difference in people's lives. Training on the Code of Conduct and Ethics is undertaken on an annual basis by all of our employees as part of our Global Compliance Course.

### ***Individual Rights***

Our Individual Rights Policy seeks to ensure the protection of individual human rights through our behaviour towards our employees, clients and service providers. The policy clearly states that we do not employ child, bonded or forced labour and we expect that our service providers treat their employees with dignity and respect.

### ***Safeguarding of Children and Vulnerable Adults***

At International SOS, we recognise our obligations with regards to providing services to children and vulnerable adults. Our Safeguarding of Children and Vulnerable Adults Policy provides

behavioural and procedural guidelines to our employees to ensure that the rights of these individuals are protected and that our employees are aware that they have a responsibility to protect them from harm or abuse when delivering our services.

### **Whistleblowing**

Our Whistleblowing Policy offers direction to staff who may become aware of modern day slavery within our business or supply chain and provides information to ensure incidents are appropriately reported.

Furthermore, all staff are required complete an annual Global Compliance Course under our Code of Conduct and Ethics. This course includes training on how to pinpoint modern slavery and how to report it. This course has been updated for 2020/21 to include awareness on our Whistleblowing Policy and encourages our employees to ask questions concerning ethical issues and report ethical violations.

Specifically, all staff who undertake procurement activity receive additional training so that they are able to follow a procurement process which is designed to reduce the risk of International SOS engaging with a supplier or service provider who may engage in modern day slavery. We have also ensured that we keep the health and safety of our employees a priority and have set out guidelines in line with local and national legislation.

### **Remediation**

International SOS is committed to the UN Guiding Principles on Business and Human Rights. Should undiscovered modern slavery practices be found, International SOS will fully cooperate in remediation efforts to mitigate the impact of these practices.

### **Mandatory Criteria 5. Effectiveness of our Actions**

International SOS is not aware of modern slavery by any of its employees, suppliers or service providers.

Furthermore, we take the following steps to ensure we are effectively mitigating the risk of modern day slavery occurring:

- Our policy and procedures related to modern day slavery are reviewed annually and may be reviewed more regularly if an incident is reported;
- Reported incidents are analysed to establish if there are any areas of risk that require further mitigations.
- In 2021 we aim to progressively implement a commitment by all our Suppliers in revised agreements to the principles of the Act to gain continued assurance that they have adequate controls to prevent the risk of modern slavery. We aim to audit for compliance against this commitment.

### **Mandatory Criteria 6. How we Consult with Entities we Control**

All related entities are subject to the same policies in relation to Modern Slavery that are a mandated requirement within the International SOS Group.

### **Mandatory Criteria 7. Other Relevant Information**

There is no additional information required in relation to our commitment to the Act.