

Modern Slavery Statement

Persol Australia Holdings Pty Ltd
November 2022

Contents

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Persol Australia Holdings Pty Ltd | ABN 58 620 794 130



Our Business

The Power of a Job Done Right

Our Vision

Slavery, servitude, forced labour and human trafficking represent a grave human rights abuse. Persol Australia Holdings Pty Ltd ACN 620 794 130 and its subsidiaries (**Programmed**) are committed to building and fostering a culture in which diversity is valued and to providing a workplace that is safe and respectful. This means that Programmed employees must treat other employees, customers, suppliers and other people with trust, dignity, respect, and fairness.

Programmed recognises the inherent dignity of its staff and each persons' equal and inalienable right to freedom, justice and fair work conditions. Programmed does not tolerate any form of modern slavery in any part of its business.

Programmed is committed to eradicating all instances of modern slavery within its business and will continue to encourage its clients, suppliers, and staff to be aware of, and take action against, instances of modern slavery within our community.

This Statement sets out the steps that Programmed has taken to ensure that modern slavery does not occur within its business or supply chain; operating in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**).

A message from our Chief Executive Officer

Our Modern Slavery Statement has been developed in accordance with the *Modern Slavery Act 2018* (Cth) (the Act) and in line with our commitments to continuous improvement this Statement was reviewed and re-approved for Persol Australia Holdings Pty Ltd ACN 620 794 130 and its subsidiaries (Programmed) by the Board on 7th December 2022.

At Programmed, we continue to be committed to respecting human rights across all areas of our business and ensuring that modern slavery is eradicated from our supply chain.

As a company, we have continued to take steps to ensure that our stakeholders are aware of the incredible efforts that we undertake to deliver our services in the most ethical, sustainable, and responsible way possible and to encourage them to join us on this journey.

Programmed is excited to be part of a community that is contributing to the eradication of modern slavery.



Taka Yamazaki
PERSOL Asia Pacific – CEO

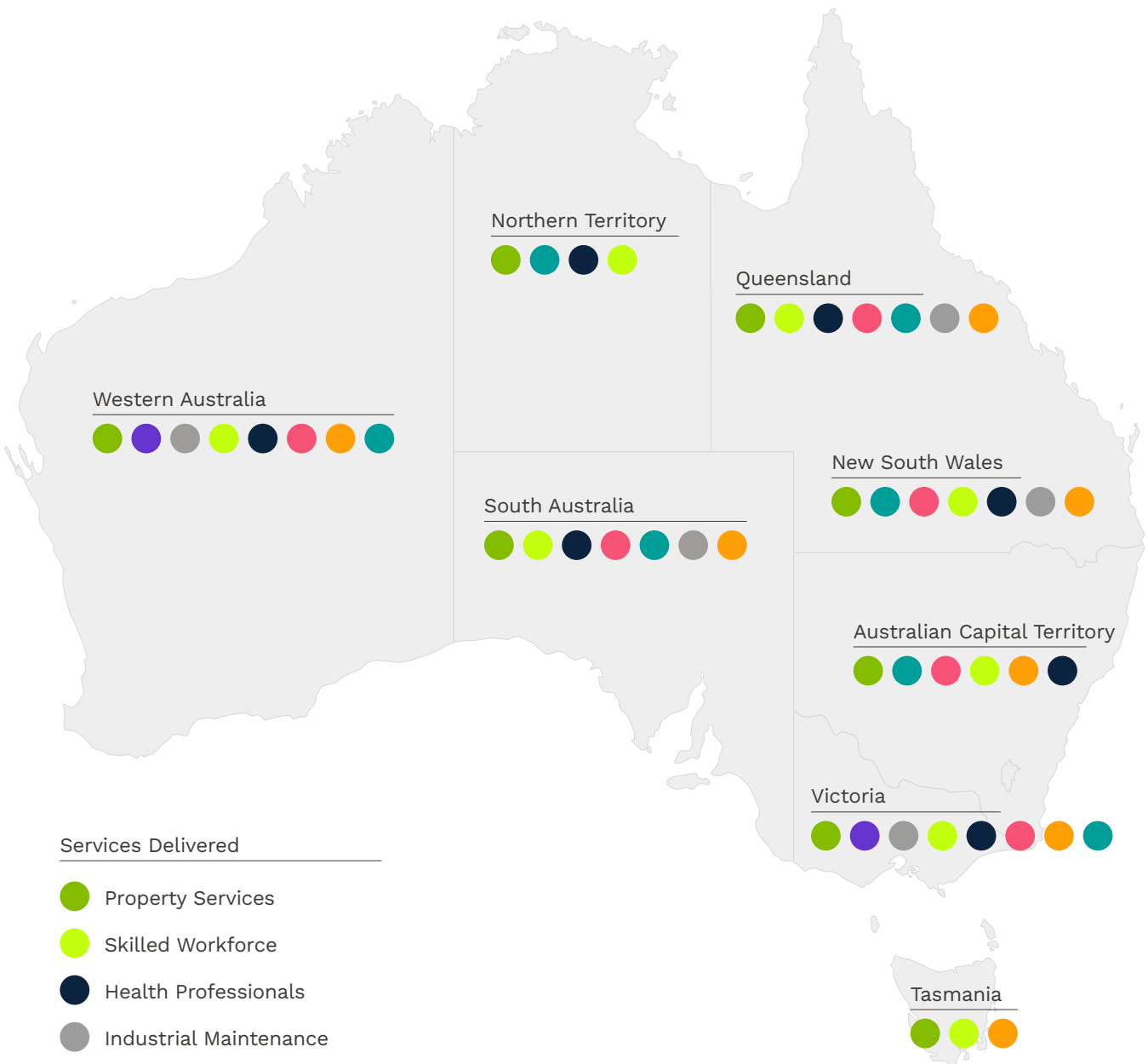
Our Business Structure and Operations

Programmed is a leading provider of staffing, operations and maintenance services across all industry sectors including education, health, infrastructure, manufacturing, transport, and mining in Australia and New Zealand.

We directly employ more than 26,000 people across a broad range of industries to provide services for more than 10,000 customers; often under long-term contracts. Its business model is built around Programmed's ability to recruit, deploy, manage, and maintain a large directly employed workforce of professional, skilled, and semi-skilled staff with a wide range of capabilities.

All of Programmed's employees value safety and continually contribute to its goal of Zero Harm. Programmed is committed to providing innovative solutions to its customers that improve business success and its people align themselves to its core values of personal safety leadership, care and empathy, customer service, and diversity, inclusion, and equality.

Our Locations



Services Delivered

- Property Services
- Skilled Workforce
- Health Professionals
- Industrial Maintenance
- Facility Management
- Electrical Technologies
- Corporate
- PERSOLKELLY

Our Services

Programmed's Key Businesses include:



Facility Management

Facility Management

Asset Management and Facility Maintenance



Maintenance

Property Services

Painting, signage, grounds and building projects

Turnpoint

Construction and maintenance services to the golf and horse racing industries

Electrical Technologies

Design, installation, and maintenance services for electrical, audio visual, and communications services

Essential Services

Multi-disciplined essential services maintenance works



Health

Health Professionals

Healthcare recruitment services, in-home care, and nursing services



Staffing

Skilled Workforce

Blue Collar/Trades Staffing, Managed Workforces

PERSOLKELLY

Professional/Executive Staffing, Managed Workforces

Training Services

Group Training Organisation (GTO) and Registered Training Organisation (RTO) Services

Industrial Maintenance

Maintenance, shutdowns, and project works to heavy industrial and hazardous sites

Our Potential Risks

Programmed recognises the inherent dignity of our staff and the people working in our supply chain and each person's equal and inalienable right to freedom, justice, and fair work conditions. Programmed does not tolerate any form of modern slavery or human trafficking in any part of our business or supply chain. Programmed has a code of conduct which notes Programmed's commitment to protecting people against modern slavery. This is reviewed on an annual basis to ensure that it remains up to date and, if required, updated.

Programmed is committed to ensuring that all parties it engages with are aware they must abide by the Act. Programmed has included relevant warranties in its terms and conditions requiring its suppliers and subcontractors to comply with the Act and verify that their own supply chain meets the Act's requirements. Programmed has also undertaken a review of all internal documents to ensure that, where relevant, they consider and make reference to the Act. Any documents which did not make reference to the Act have been updated.

By ensuring that all subcontractors and suppliers are made aware of Programmed's policies and procedures during the onboarding process, Programmed can take comfort that its obligations under the Act are met and that the companies which are performing work for Programmed are committed to assisting Programmed in its vision to diminish modern slavery.

Additionally, Programmed uses its best endeavours to ensure that all parties it engages hold the appropriate licenses and comply with all regulations. As such, Programmed considers that the risk of modern slavery occurring is low.

As at the date of this statement, Programmed has not discovered any cases of modern slavery across its supply chain, either within its operations, suppliers or subcontractors. No form of modern slavery is knowingly used in Programmed's business, by its directors, officers, employees, agents, representatives, contractors, or subcontractors.

However, Programmed is aware that identifying and addressing issues of modern slavery is an ongoing project as modern slavery can occur in every industry and sector with severe consequences for victims.

Given this, Programmed is committed to continuous observation and improvement to its supply chain. Programmed identified several high risk supply categories for further review in 2021 (as noted in the table below).

Country	Modern Slavery Risks Indicators	High Risk Supply
Australia	<ul style="list-style-type: none"> • Servitude • Debt bondage • Child labour • Deceptive recruitment practices • Forced labour 	<ul style="list-style-type: none"> • Cleaning Services • Security Services • Uniform & PPE Manufacturing • Office Consumables Supply • Electrical Components Supply • Grounds Equipment Supply • Tools Supply
New Zealand	<ul style="list-style-type: none"> • Servitude • Debt bondage • Child labour • Deceptive recruitment practices • Forced labour 	<ul style="list-style-type: none"> • Cleaning Services • Security Services • Uniform & PPE Manufacturing • Office Consumables Supply • Electrical Components Supply • Grounds Equipment Supply • Tools Supply

“Identifying and addressing issues of modern slavery is an ongoing project.”

Our Actions

Throughout 2021, Programmed continued to take steps towards its goal of the eradication of modern slavery in its supply chain. These actions have included:

- Reviewing and revising its terms of supply;
- Implementing a training program across the Programmed business;
- Implementing a review of all relevant internal policies;
- Issuing questionnaires to its suppliers; and
- Introducing an audit program to ensure ongoing compliance with the Act.

Programmed will continue to build on these action items in 2022.

Terms of Supply

As part of its modern slavery eradication program, Programmed has committed to ensuring that all parties it engages are aware that they must comply with the Act. For example, Programmed has included various warranties in its terms and conditions requiring its suppliers to abide by the Act and verify that their own supply chain meets the Act's requirements.

Programmed has also undertaken a review of all internal documents, including all terms and conditions used by the various arms of the business to ensure that, where relevant, they make reference to, and ensure compliance with, the Act. If required, these internal documents were updated.

Training Program

Programmed has implemented a modern slavery training package available to all of its 26,000 employees so that all Programmed employees appreciate the importance of the eradication of modern slavery. This training program helps to educate those who may be unaware of what modern slavery is and give them the tools to know what do to about it when they see instances of modern slavery on site. This training package was reviewed and updated in 2021.

All employees are encouraged to undertake the training package each year. Programmed is committed to reviewing and updating the training package annually to ensure that it remains up to date and incorporates any legislative changes. Training is also undertaken in various forms including by way of tool box talks, webinars and formal presentations. These training programs will continue to be updated and reviewed annually as the knowledge base and awareness of Programmed's employees increases.

Our Policies

As part of its commitment to continuous improvement, Programmed will continue to review and develop its codes of practice, procedures, requirements, risk assessment, and monitoring frameworks that operate concurrently to ensure the eradication of modern slavery within its supply chain. Programmed will continue to evolve its procurement practices to ensure its suppliers comply with all requirements of the Act.

Programmed is committed to continuously reviewing and updating its policies and procedures to ensure that it meets its moral and ethical obligations to end modern slavery. Programmed requires each of its suppliers to adhere to Programmed's supplier requirements which mandate that suppliers will not use child labour, forced labour, or involuntary labour.

Programmed has a central procurement policy which includes a key focus on the mitigation of risk, compliance with all regulatory requirements as well as a requirement to act fairly, ethically, and responsibly when procuring goods and services. This policy will be reviewed annually and, if required, updated.

Programmed has a range of various policies and handbooks across its business that refers to its commitment to eradicating modern slavery and to its Modern Slavery Statement. These documents also set out the expectations that Programmed has of its suppliers.

The following documents support Programmed’s commitment to the eradication of modern slavery:

- Code of Conduct;
- Industrial Relations Policy;
- Diversity and Inclusion Policy;
- Whistleblower Policy;
- Equal Opportunity Policy;
- Subcontractor Handbook; and
- All terms and conditions used by the various Programmed entities.

These documents were reviewed in 2021 and will be continue to be reviewed and updated annually.

“We have a range of policies and handbooks across our business that makes reference to our commitment to eradicating modern slavery.”

Supplier Questionnaires

Programmed's supplier on-boarding questionnaire includes a number of questions to assess modern slavery risks. However, Programmed acknowledges that ongoing investigation is required to meet its modern slavery reporting and continuous improvement requirements.

The questions that are asked of suppliers include the following:

Business Ethics and Related Parties

- Do you comply with international labour organisation (ILO) conventions against child labour?
- Can your business confirm there is no forced or compulsory labour used to provide these services?

Industrial Relations and Employment Matters

- Do all employees have the right to work in Australia or New Zealand (as applicable)?
- Has all employee remuneration due to workers under Awards, Agreements and Standards been paid?
- Have all staff entitlements and accruals in relation to leave entitlements been provisioned?
- Is the business registered and making contributions as and when due to the long service leave fund?
- Has the business made all payments due under the SGC (**Superannuation**) by the due date?

In 2021, Programmed's modern slavery investigatory methods were complimented by the Property Council of Australia's (PCA) supplier platform. This platform provides a modern slavery risk ratings calculation which follow the United Nations Environment Programme guidelines for Social Life Cycle Assessment. This is an ISO standardised framework for the assessment of social and environmental impacts of goods, services, and organisations.

Risk Assessment Methodology

In 2021, Programmed's procurement database was screened for five social risk categories: labour rights and decent work, health and safety, human rights, governance, and community infrastructure (see figure below). These risks were obtained from the Social Hotspot Database (SHDB), which indicates the likelihood of an issue occurring in different industries and countries. Within these social risk categories are subcategories directly relating to modern slavery such as child labour, forced labour, excessive working time, safe working conditions, exploitation of migrant labour, general human rights, and governance.

Assessment of Risk

When a potential Programmed supplier completes the onboarding questions on Programmed's supplier platform, they are asked to indicate their industry category and the location of their operations. Based on this information provided, the supplier is given a risk rating. The risk rating is informed by the risk analysis from the SHDB. If a supplier doesn't identify with any of the preprogrammed categories or countries, a generic conservative rating will be given.

Once the supplier has completed the questions, they go on to complete the modern slavery questionnaire. The questions that they are asked are dependent on the supplier's risk rating (being either a low-medium risk or a high-risk questionnaire), and on other information that the supplier has provided to the Programmed procurement team.

The process is outlined as follows:



Audit Program

Programmed's Modern Slavery Statement, together with Programmed's Code of Conduct, form part of the certified Integrated Management System which is subject to external audit for compliance with ISO 9001:2015.

It provides the framework for Programmed to prevent and eliminate modern slavery and human trafficking in its business and supply chain through the following:

- Regularly undertaking an assessment of operations and supply chains to identify risks of modern slavery and human trafficking taking place;
- Where risks are identified, developing a management plan to remove those risks;
- Requiring Programmed's suppliers and subcontractors to sign terms and conditions which require them to support Programmed in meeting our legal, ethical, and moral obligations in relation to modern slavery; and
- As part of Programmed's regular review of subcontractor performance, testing the effectiveness of steps to eliminate modern slavery practices.

The PCA platform provides an initial indication of supplier risk so that further questions can be asked by Programmed to assess the risk of modern slavery. In 2021, this platform has provided a means to monitor and evaluate responses from high risk suppliers by Programmed.

Our Consultative Approach

Programmed has a centralised governance structure which facilitates consultation and collaboration between group entities. Programmed has a dedicated Modern Slavery Committee and additionally, Programmed also discusses modern slavery via its Environmental, Social and Governance (ESG/HSE) Committee. These committees meet regularly and are attended by executive representatives from each of Programmed's entities. Modern Slavery is also a standing item at meetings of Programmed's Business Committee which consists of Programmed directors.

Assessing Our Actions

Our 2021 Milestones

Programmed has continued to cultivate a highly unique and values-driven culture that is demonstrated at every level of its operations. Our values in care and empathy, diversity, inclusion and equality, customer service, and personal safety leadership are evident in our behaviour and in the way we interact and serve the varied and numerous communities in which it works.

Programmed is committed to eradicating all instances of modern slavery within its business and, in 2021, has continued to encourage its clients, suppliers, and employees to be aware of, call out, and eradicate instances of modern slavery within the Programmed community.

Programmed has implemented the following actions to support modern slavery awareness across its supply chain in 2021:

Completed

- ✓ Programmed continued to roll-out its ERP platform (Dynamics 365) to complete re-onboarding of vendors (suppliers / subcontractors / consultants) across the business.
- ✓ Programmed reviewed its procurement categories to identify high-risk indicators of modern slavery practices (i.e. business sector, employment practices, etc).
- ✓ Programmed implemented the PCA supplier platform to support the audit of potentially high-risk suppliers. 320 vendors were identified as being common between Programmed and the PCA supplier platform. Questionnaires were issued to a further 136 vendors.
- ✓ Programmed developed and rolled-out mandatory training for suppliers.
- ✓ Programmed implemented and updated its internal training via the online training library.
- ✓ Programmed reviewed and updated the subcontractor handbook used by Programmed's numerous subcontractors to include modern slavery provisions and make reference to the requirements of the Act.
- ✓ Programmed reviewed its existing whistleblower hotline program accessible to employees and suppliers.

Improvements

Programmed is committed to implementing policies and procedures that meet its moral and ethical obligations to end modern slavery, including requiring all subcontractors and suppliers to comply with the terms of the Act. Programmed requires each supplier to adhere to its standard supplier requirements which mandate that suppliers will not use child labour, forced labour, or involuntary labour.

As part of Programmed's commitment to continuous improvement, Programmed will keep developing the codes of practices, procedures, requirements, risk assessment, and monitoring frameworks that address the issues of modern slavery. Programmed will continue to evolve its procurement practices to ensure suppliers comply with all requirements of the Act and are committed to the eradication of modern slavery.

Programmed has identified the following business improvements which will be implemented in 2022 to support the existing efforts to eradicate modern slavery practices across its supply chain.

Ongoing Improvements 2022

- ✓ Programmed will continue to review and update the subcontractor handbook used by Programmed's numerous subcontractors to include modern slavery provisions and make reference to the requirements of the Act.
- ✓ Programmed will continue to review its list of vendors and roll out the questionnaires to any vendors which are considered to be high risk.
- ✓ Programmed will continue to roll-out its ERP platform (Dynamics 365) to complete re-onboarding of vendors across the business.
- ✓ Programmed will develop an auditing process to be rolled out in 2023 to any vendors which are deemed to be high risk.

Thank you for reading the Modern Slavery Statement

If you have any questions about
the information contained in this
statement, please contact:

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