



PeopleiN

A new face for
People Infrastructure

Modern Slavery Statement 2020



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Introduction

People Infrastructure Limited (ABN 39 615 173 076) is subject to the *Modern Slavery Act 2018* (Cth) ('Act') that commenced operation on 1 January 2019. The Act requires reporting entities subject to the Act, to produce an annual modern slavery statement.

People Infrastructure Limited is a publicly listed company on the Australian Securities Exchange (ASX:PPE), with corporate headquarters based in Brisbane, Australia.

This joint statement covers the activities of People Infrastructure Limited together with its controlled entities (collectively, the Group) as outlined in its annual report [People Infrastructure Ltd Financial Report 30 June 2020](#)

The Group is committed to operating in a manner consistent with the laws and regulations of the jurisdictions in which its businesses operate, including those relating to Modern Slavery.

This statement is underpinned by the Company's core values, its commitment to protecting Human Rights as outlined in its Human Right Policy and outlines the actions undertaken by the Group in relation to all activities undertaken to identify and mitigate the risk of modern slavery and human trafficking occurring in its operations and supply chains.

All subsidiaries have been consulted to develop this modern slavery statement, including briefing with its Group CEO, CFO and the Board of Directors.

This is People Infrastructure's first report under the Act for the period ending 30 June 2020.

About our Business

The Group is a leading Australian workforce management company headquartered in Brisbane, delivering innovative solutions to workforce challenges faced by Australia's leading businesses. We operate across four main sectors including healthcare, community care, information technology and industrial & specialist services.

The Group's Leadership, Finance & Administration, Employee Relations and Safety teams have various policies in place that support our day-to-day operations to ensure all employees and suppliers meet People Infrastructure's core values.

All of the Group's subsidiaries are licensed labour hire providers under the relevant state based Labour Licensing Act that they operate within.

Corporate Governance

The Directors and management of the Group are responsible for reviewing and maintaining the corporate governance principles of the Group and ensuring that they do not materially differ from the principles set out in the ASX Corporate Governance Principles and Recommendations.

The Board considers there is a strong link between good corporate governance policies and practices and the achievement of the Group's commercial objectives. Corporate Governance is the framework of rules, relationships, systems, and processes within which, and by which authority is exercised and controlled in corporations. The Board meets monthly to review business operations and corporate governance compliance of the Group. This includes adopting appropriate policies and procedures designed to ensure that People Infrastructure is properly managed to ensure human rights are protected. The Group's corporate governance statement which outlines its approach can be found at <https://www.peopleinfrastructure.com>

As part of its risk management approach to upholding human rights and specifically addressing any modern slavery risks in the Group's operations and supply chains, the Audit and Risk Committee improve the efficiency of the Board through accepting the delegation of tasks and performing them in a forum where they can receive greater attention to detail than would be practical solely at Board level.

The Committee's role is to advise on the establishment and maintenance of a framework of internal controls for the Company's management to ensure that its expectations and standards are understood by all of its stakeholders. These steps will ensure any potential risk to human rights is minimised.

The committee meets at least six monthly in Brisbane. During COVID-19, meetings were not disrupted however the format has changed and meetings are now conducted virtually through Microsoft teams if unable to meet face to face.



Impact of COVID-19

COVID-19 had an impact on workforces globally, not previously seen in the last 50 years. The welfare of the Group's employees is at all times an absolute priority to the business and from the outset of the spread of COVID-19, the Group worked extensively with its clients to implement comprehensive preventative measures consistent with government advice to protect its employees against the potential spread of COVID-19. The Group is acutely aware that a lot of the work performed by the Group's employees is both of a critical nature and involves close contact with others, in some cases with people infected by COVID-19.

The Group had limited disruptions to its supply chains because of COVID-19 as all suppliers are locally sourced which limited our exposure to shortages. Our healthcare division experienced disruptions in its supply of PPE such as masks and rubber gloves. This was minimised by the reduced numbers of staff required to work in healthcare and aged care environments due to the government imposed safety requirements to limit the movement of staff working across different environments to reduce the spread of COVID-19.

Our Victorian businesses were heavily affected by the Government restrictions and we were able to support the majority of our employees through various government subsidies. The Group implemented a COVID-Safe policy as part of its commitment to protect all of its employees and all businesses across the group implemented a detailed COVID safe management plan to manage the exposure of workers, and the associated risk to all personnel, to COVID-19 while working in the Group's offices and/or on Client sites. The COVID-safe management plan outlined vulnerable employees that were at greater risk of COVID-19 and outlined support mechanisms and guidelines as per the Australian Health Protection Principal Committee (AHPPC) recommendations for managing vulnerable workers.

Structure, Operations, and Supply Chain

Division Area	Main Operations	Supply Chains
HealthCare	Delivery of contracted Nursing services, training and labour hire to clients operating within Australia.	Training facility, individual client homes, private and public hospitals, clinics, and healthcare facilities located in New South Wales, Queensland and Victoria.
I.T	Delivery of recruitment and contracted I.T professional services to clients operating within Australia.	Head Offices in Melbourne, servicing clients across Australia. Suppliers are all Australian owned and based located in Sydney and Brisbane.
Industrial Specialist Services	Delivery of labour hire and staffing services to clients operating within Australia.	All suppliers are locally based in their Australian region. Servicing clients across Australia with head office based in Brisbane.
Community Services	Delivery of contracted staffing across community services, to clients operating within Australia.	All Suppliers are locally based . Head office in Wollongong, NSW with operations across WA, NSW, SA, NT, QLD, VIC.
Corporate Services	Support Functions to Groups operations.	Head office in Brisbane QLD, which incorporates corporate services functions including finance supporting offices and operations nationally.

Profile

The Group currently divides their business in to four distinct segments: Health & community care, Industrial, IT and specialist services.

Figure 1: Segment profit and sector revenue weights

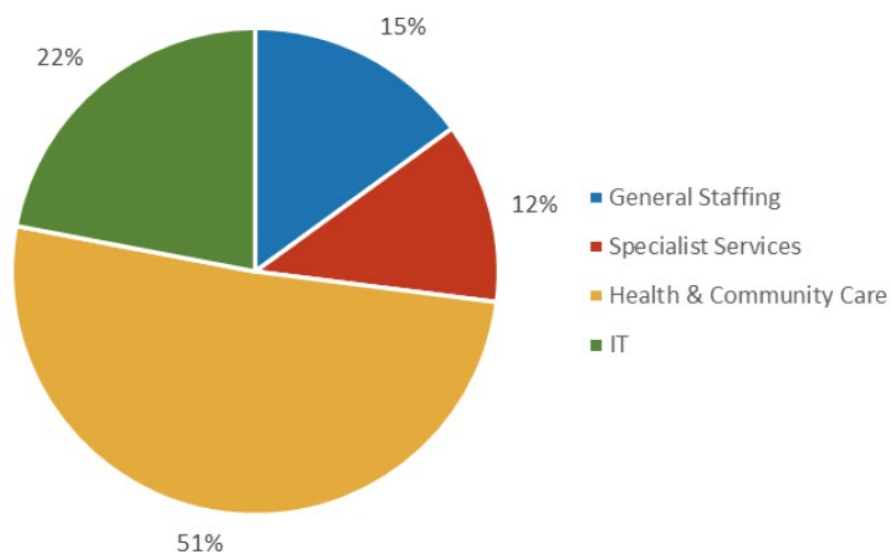
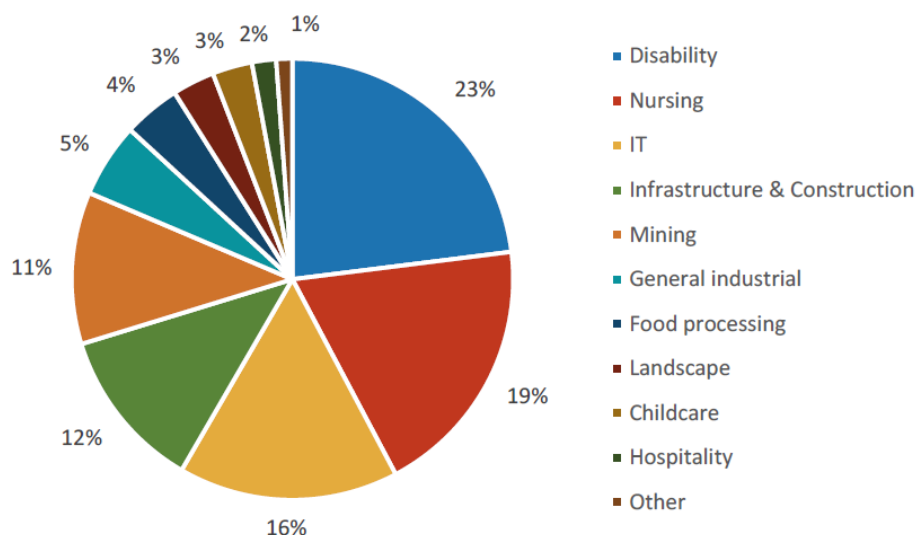


Figure 2: Segment profit and sector revenue weights



Our Framework

The Group's approach is to ensure that we have robust frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chain.

In preparing for its first statement the Group reviewed international resources and implemented guidance to supply decent work in supply chains.

The Group recognises 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.

The Group is fully committed to operating responsibly and establishing and adhering to the highest ethical standards across our group. We will not tolerate any forms of slavery or human trafficking in our business.

In the year to 30 June 2020, prior to the implementation of this statement the business conducted a comprehensive assessment to understand and implement actions to minimize the risk of modern slavery and human trafficking in our operations and supply chains.

As a result of this examination, we took steps to address any potential modern slavery risks identified. Those steps included:

1. Assessment of the potential modern slavery risks in our operations and supply chains with emphasis on high-risk geographical locations.
2. Review and update to company policies including Human Rights Policy to include focus on eradicating any potential modern slavery in operations and supply chains.
3. Development of training for staff in modern slavery requirements and how to identify modern slavery.
4. Due diligence on local and any global supply chains.
5. Review and amended supplier contracts to ensure they contain terms that are consistent with the Act.

Risk of Modern Slavery Practices within the Group and the Supply chain

Within the Group, we recognise that as a supplier of labour hire which accounts of 91% of the Group's operations, this is considered higher risk under the reporting guidelines due to it being a third party relationship model and in particular for any low wage, low skill, remote locations, young and migrant workers.

The Group is committed to operating our business lawfully and ethically and in only working with clients, host employers and suppliers that are aligned to our values. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity. We expect our clients, host employers and suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour.

The Group has identified that due to the fact that we don't have operational control over our on-hired workforce that this could present as a risk for modern slavery. We have therefore taken stringent measures to ensure that any potential risk is mitigated and eliminated as outlined below.

Our approach to Risk management and due diligence processes

In the year to 30 June 2020 the Group has implemented preventative risk management processes to identify, assess, mitigate, and monitor any potential risk areas where there could be exposure to human rights concerns including modern slavery.

This included:

- completing a supply chain risk audit to understand any potential risks;
- developing and deployed a Modern Slavery questionnaire for all of its clients and suppliers to uncover if any risks were identified;
- implementing a completed comprehensive assessment process for vetting of all potential clients prior to entering into any commercial agreements;
- conducting pre-site safety inspections for all new clients and locations where our employees may work;
- ensuring regular auditing of all worksites;
- updating the Whistle-Blower policy for anonymous reporting;
- following Best Practice recruitment practices;
- employing qualified managers that have the skills and experience to identify any risks and manage in accordance with our policies and procedures;
- implementing Modern Slavery training for all managers across the group to understand and identify any potential risks of modern slavery;
- establishing the requirement to conduct more regular payroll auditing to ensure employees are paid correctly;
- external auditing of our financial statements; and
- installing practices for systematic health checks and consultation calls with all workers in sites around Australia and New Zealand.

Procedures and policies

In the year ended 30 June 2020, policies were updated to ensure they reflect the Group's commitment to protecting human rights and minimising modern slavery risks. Due to our comprehensive policies and practices, any potential modern slavery risk is very low due to these sound consistent practices and policies in place across each of our four divisions. The updated policies include:

- Processes and policies for grievance handling procedure;
- Whistle-Blower Policy;
- Child worker parental consent forms;
- Human Rights Policy;
- Code of Conduct; and
- Diversity Policy

Ongoing due diligence and risk management processes

The Group has taken steps to review and improve on policies and procures to address human rights issues internally and externally and has addressed any gaps that arise out of any risks that are identified.

In the year to 30 June 2020 the group has implemented a delegation policy which outlines the delegation of authority within the corporate structure.

The Company's risk management program comprises a series of processes, structures and guidelines which assist the Company to identify, assess, monitor, and manage its business risk, including any material changes to its risk profile.

The Group seeks to do business with clients that have comparable values, ethics, and sustainable business practices, including those related to human rights. People Infrastructure recognises that as a supplier of labour hire to its clients its conduct and performance can have a significant impact on its reputation within the communities in which it operates.

To ensure that clients uphold the same values as the Group they are required to ensure, and show evidence that demonstrate that all of its agents, contractors and sub-contractors:

1. comply with all applicable laws, statutes, regulations in force from time to time, including but not limited to the Modern Slavery Act 2018 (Cth); and
2. take reasonable steps to ensure that there is no Modern Slavery (as defined in section 4 of the Modern Slavery Act 2018 (Cth)) in the client's, agents, contractors and/or sub-contractors supply chains or in any part of their business.

All of the Group's clients are required to implement due diligence procedures, produce an annual statement, if required, and to ensure that there is no Modern Slavery in its supply chains and notify the Group as soon as it becomes aware of any actual or suspected Modern Slavery in a supply chain.

The Group requires its clients to maintain records to trace the supply chain of all goods and services supplied to People Infrastructure and the steps it has taken to ensure that Modern Slavery is not taking place in any of its supply chains or in any part of its business.

Our approach to Grievance and Mediation

The Group has a group whistle-blower policy that allows employees and contractors to raise concerns in a confidential manner. This channel is available for reporting any modern slavery concerns.

Grievances can also be raised to each entity within People Infrastructure through direct contact or through any of their social media channels under our grievance handling policy and procedures.

Employees can also raise any concerns directly to the Human Rights Commission. When a concern or grievance is raised the Group will investigate and address appropriately.

Continuous Improvement and looking ahead

The Group will continue to review the progress of its implemented practices to ensure that it is aligned with meeting its objectives to address any potential modern slavery risks within its operations and supply chains by:

- Continuing to implement on-site client assessments at all its on-hired operations.
- Continue to ensure all new suppliers and clients all received updated commercial terms that incorporate modern slavery requirements.
- Continue to assess modern slavery and human rights risks with a view to improve its processes to ensure best practice.
- Continue to train all staff on the groups code of conduct and ensure all staff received modern slavery training and whistleblower training as part of their 90-day induction training.
- Assess the effectiveness of our actions by implementing KPI's to capture and monitor key information including but not limited to:
 - I. The number of modern slavery training and awareness-raising programs delivered.
 - II. The amount of any complaints received and resolved through our reporting and grievance mechanisms.
 - III. Contracts that contain modern slavery clauses.
 - IV. The number of actions/improvements taken with our suppliers to improve their capacity to respond to modern slavery risks.
- Compliance monitoring of suppliers and clients as well as internal audits within the Group.

The entities owned and controlled by the Group all operate under the directions and governance of the Board of People Infrastructure Limited.

This Modern Slavery Act Statement is made for the financial year ending 30 June 2020.

The Board of Directors of People Infrastructure Limited has approved this statement on behalf of itself and all the other reporting entities covered by this statement on Thursday January 28th 2021 and will be updated annually.

Glen Richards



Chairman

01/02/2021