



# MODERN SLAVERY STATEMENT.

**BAYSIDE GROUP**

## OUR PURPOSE ○

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The purpose of the Bayside Group's Modern Slavery Statement, as informed by the Modern Slavery Act 2018, is to outline our approach and commitment to minimising the risk of modern slavery in our business operations and supply chain.

This includes slavery, servitude, child labour, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour or services.

As labour hire, recruitment and secondment solutions are components of our service offering, our existing practices and governance frameworks are cognisant of modern slavery elements, in line with Australian employment legislation. These services have been defined in this document for clarification.

We recognise that our responsibilities lie beyond legally compliant practises across our operations, to ensuring ethically and socially sound and responsible engagement and treatment of all workers across our business operations and supply chain.

## OUR APPROACH ○

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- With employment at the core of what we do, we have formal policies already in place that are intended to promote ethical and legally compliant employment practices and business conduct.
- A Modern Slavery Working Group has therefore been established to identify areas for improvement, establish key priorities and provide recommendations for implementation into these structures. This team includes a Company Director, along with representatives from our HR, Workplace Relations, HSE, Procurement and Quality teams. We will draw from the expertise of other employees as required.

## OUR STRUCTURE & SUPPORT ○

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- Our Statement covers the activities of the Bayside Group and its controlled entities. A complete list of entities and trading names can be found at Appendix 1. Bayside Group comprises a number of entities all related by way of common control and ownership. Our recruitment and workforce management services are delivered under specialist brands.
- Australian owned and operated, Bayside Group has been a service provider since 1976, servicing customers primarily in Australia along with select companies abroad.

## OPERATIONS & SUPPLY CHAIN

OUR SERVICES	OUR PEOPLE	OUR SUPPLIERS
<p>Recruitment &amp; Workforce Management</p> 	<p>Recruitment Consultants                      Marketing &amp; Communications                      Quality &amp; Compliance                      HR &amp; HSE                      Workplace Relations                      Finance &amp; Payroll                      Administrators</p>	<p>Technology                      PPE &amp; Equipment                      Stationery, Office Supplies &amp; Merchandise                      Facilities Management                      Vehicles                      Consultants</p>
<p>Project Management, Engineering and Consulting Services</p> 	<p>Drafters                      Engineers                      Project Managers                      Trainees                      Administrators</p>	<p>Technology                      PPE &amp; Equipment                      Stationery, Office Equipment &amp; Merchandise                      Facilities Management                      Vehicles                      Consultants</p>
<p>Information Technology</p> 	<p>IT Support                      Specialist IT Professionals                      Based in Australia and the US</p>	<p>Technology (including hardware, software, cloud services, programs)                      PPE &amp; Equipment                      Stationery &amp; Office Equipment                      Facilities Management                      Vehicles                      Consultants</p>

All services are delivered primarily from Australia, with a portion of our suppliers using off-shore employees.

## EMPLOYMENT SERVICES ○

→ Across our various brands, we provide permanent recruitment, labour hire and secondment services.

### PERMANENT RECRUITMENT

Permanent recruitment activities include attraction, sourcing and screening of suitably qualified candidates to meet the internal staffing requirements of clients. Successful candidates become employees of that client. Our consultants discuss salary requirements and will generally make the employment offer, which provides us with the opportunity to ensure pay rates are compliant with relevant awards and legislation upon initial placement.

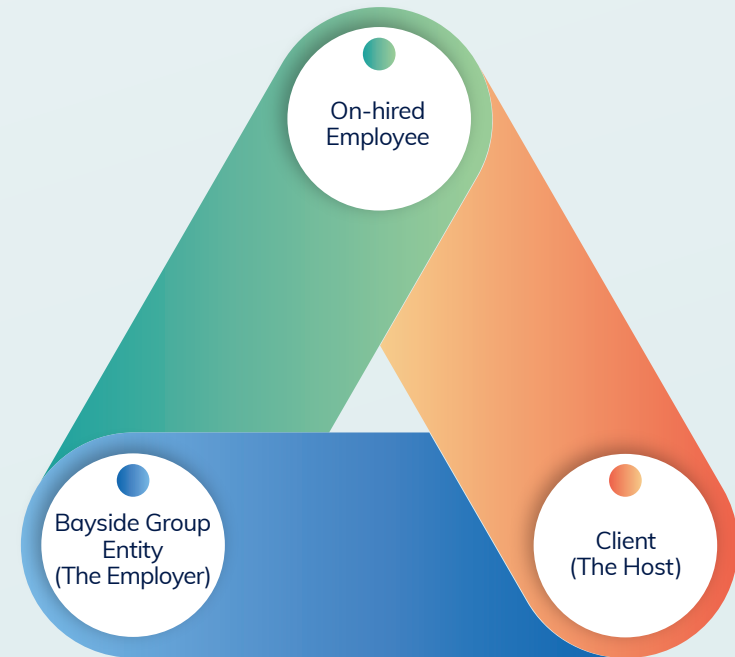
### LABOUR HIRE (ON-HIRED EMPLOYMENT)

As part of our recruitment and workforce management service offering, we engage and 'on-hire' workers to perform work for a client, with the client considered a 'host employer'. As such, we assume all legal, moral and ethical obligations associated with being an employer.

Contracts with our on-hired employees define a clear path of employment, providing independent delineation from that of the host employer. Furthermore, detail is provided about relevant pay rates and applicable instrument entitlements along with the other attributes of casual, full-time or part-time employment.

Host employers also have legal responsibilities including providing a safe work environment. The majority of on-hired labour is supplied on a casual basis or for specific periods of time (by engagement under fixed or maximum term contracts). In legal parlance, the use of labour hire is known as a 'Triangular Employment Relationship' due to the three parties that are involved when an on-hired employee is engaged to work.

## THE TRIANGULAR EMPLOYMENT RELATIONSHIP



## SECONDMENT SERVICES

Across various entities, we second employees on an as-needs basis to client sites. Whilst similar to the Labour Hire model, the key difference is that a seconded employee will return back to a role within the relevant entity once the secondment is finished, whereas a labour hire employee will only work assignments with host employers. The seconded employee is supported by internal staff as required, and is more likely to have a dual internal and 'host employer' reporting line. We are responsible for all employment contracts and payment of seconded employees, and share OH&S responsibilities with the sites where the employee is seconded to work.

## IDENTIFIED RISKS ○

- Risks that may possibly cause, contribute and/or be directly linked to modern slavery practices have been considered in accordance with the Australian Government's Department of Home Affairs draft guidance document (2018), identifying three major risks for our operations – underpayment, adverse working conditions and forced labour through our supply chain's international components.
- All Bayside Group entities are 100% compliant with the applicable Labour Hire Licencing regulations, designed to prevent these risks and continually adhere to these arrangements. We are National System Employers and thus, ensure that the applicable terms of the National Employment Standards (NES), the appropriate Modern Award, or other industrial instrument and contract of employment are enforced. Each employee is therefore afforded their full working entitlements and if a mistake is made, it's corrected in a timely manner, and in full.
- Our key risks at an operational level are concerned with ensuring monitoring and controls already in place are robust and identify any issues quickly. It is important to note that while responsibilities with host employers may be shared, we have the ultimate responsibility to protect our employees.
- As we embark upon this process, it has been identified we have less controls and systems in place for monitoring across our supply chain.

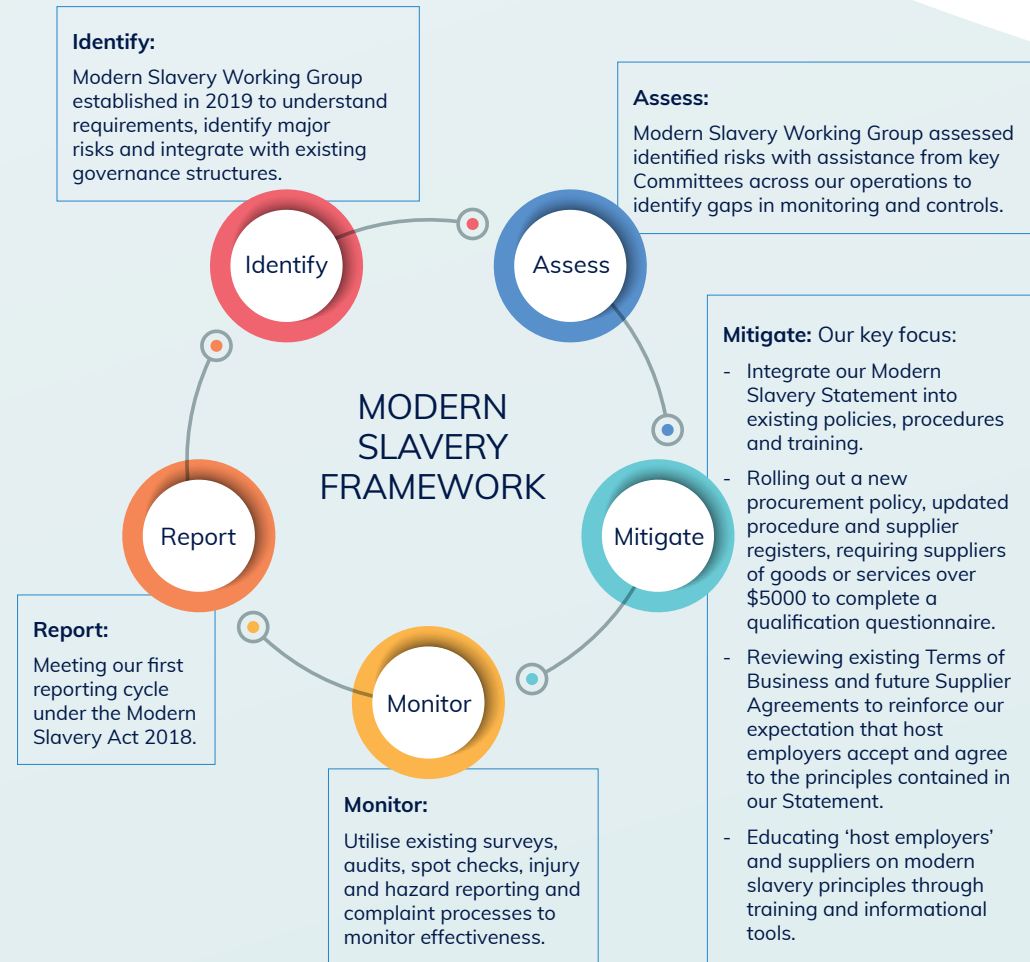
## MAJOR RISKS

## ASSOCIATED FACTORS

Underpayment of employees	<ul style="list-style-type: none"> <li>Payment below Modern Awards</li> <li>Withholding of employment entitlements</li> <li>Underpayment of overtime hours worked</li> <li>Accommodation or other benefits incorporated into payment</li> <li>Debt bondage</li> </ul>
Adverse working conditions	<ul style="list-style-type: none"> <li>Fatigue (breaks and number of hours worked)</li> <li>Retaliation or reprisal for speaking out</li> <li>Breaches of health and safety standards and legislation</li> <li>Discrimination</li> <li>Bullying, harassment or coercion</li> <li>Injuries or workplace hazards</li> <li>Restricting freedom of association</li> <li>Accessorial and vicarious liability</li> </ul>
Forced labour through supply chain	<ul style="list-style-type: none"> <li>Underpayment/living wage</li> <li>Restricting freedom of association</li> <li>Child slavery (suppliers of textile a risk)</li> <li>Intimidation and violence</li> <li>Coercion</li> </ul>

## MITIGATING RISKS & MONITORING

- As a services organisation, it is essential that any steps we take to mitigate risks of modern slavery are integrated into our current governance structures, which include our:
  - Risk and Quality Committees (which meet regularly and report directly to the Board).
  - OH&S Committee (meets regularly and the HSE Manager reports to the Board quarterly).
- Quality Management Systems (ISO certified) which encompass project management, engineering and consulting services, and recruitment and workforce management services.
- The Modern Slavery Working Group meets quarterly, and has representation across these Committees, facilitating continued identification and mitigation of potential risks. We have existing systems in place to monitor underpayment of employees and adverse working conditions, with gaps identified and improved on each year.
- Legislative monitoring is maintained through our Quality Management System, which is regularly audited externally and internally.



## FUTURE COMMITMENTS

- The Bayside Group may elect at any time, to stop working with any other body, organisation, entity, individual or company, and only engage with clients who can and will sustain compliance with the values set out in this Statement.
- The Bayside Group, as directed by the Board of Directors, mandates that a review of this Statement must take place at least annually to ensure compliance. Any amendments made will be issued on an annual basis or earlier as deemed necessary.
- Over the next year, our focus will be on integrating principles of our Modern Slavery Statement into our current systems and improving supply chain monitoring and control.
- Key actions will include:
  - Integrating our Statement components into all relevant policies and procedures.
  - Developing a new procurement policy, updated procedure and supplier register.
  - Reviewing our existing Terms of Business and future Supplier Agreements to ensure alignment with our Statement.
  - Meeting our first report requirement under the Act.

This Modern Slavery Statement was approved on 26th May 2020 by the Bayside Group's Board of Directors, which encompasses all the trading entities listed in Appendix 1.

Signed on behalf of the Board of Directors:



**Robert Blanche**  
Founding Director



**John Wilson**  
Founding Director

## APPENDIX 1 – ENTITIES & TRADING NAMES

This Statement encompasses the following entities and trading names: Bayside BWE Pty Ltd, Bayside Group Pty Ltd trading as Bayside Group Workplace Relations, Bayside Personnel Australia Pty Ltd including trading names Bayside Personnel International, Bayside Group Automotive Recruitment and Austrhealth, Baytech Industrial NSW Pty Ltd, Baytech Industrial QLD Pty Ltd, Baytech Industrial VIC Pty Ltd, Bridge Consulting & Recruitment Pty Ltd, CozWine Pty Ltd, Techstaff Pty Ltd, Balpara Pty Ltd, Balpara Services Pty Ltd and NineWire Pty Ltd.