

Modern Slavery Policy

Policy Statement

Advanced Personnel Management Human Services International Ltd, and all its subsidiaries (APM Group) are committed to upholding fundamental human rights, including reducing the risk of Modern Slavery within our global operations and supply chains.

Purpose

The purpose of this policy is to provide APM Group's employees and stakeholders with the knowledge and means to identify and report any potential Modern Slavery risks across the APM Group's scope of operation. This policy supports APM's Modern Slavery Statement as required under the *Modern Slavery Act 2018* (Cth) (**the Act**), and other modern slavery and human rights legislation globally.

Scope

This policy applies to all APM Group employees and contracted staff (permanent, temporary and casual) employed across the APM Group's companies, divisions and business units. It also applies to all contractors, consultants, and other stakeholders of the APM Group. It regulates how we manage and interact with our supply chain. This policy applies on a global level but may be supported by local policies to ensure compliance with regulatory or contractual requirements in APM countries.

What do we mean by Human Rights?

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, sexuality or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education and many more. Everyone is entitled to these rights, without discrimination.

These rights are enshrined in international accords such as the United Nations Universal Declaration on Human Rights, the Constitutions of countries and states, domestic legislation, and legislation of regional bodies such as the European Union.

What is Modern Slavery?

Modern Slavery is an abuse of fundamental human rights.

The term "Modern Slavery" describes situations where coercion, threats or deception are used to exploit victims and undermine a person's freedom. Modern Slavery includes the following types of serious exploitation:

- **Human trafficking or trafficking in persons** – it is the recruitment, harbouring and movement of a person for exploitation through modern slavery.
- **Slavery** – it is where a person exercises powers of ownership over another person, including the power to make a person an object of purchase and use their labour in an unrestricted way. It means someone owns another person like a piece of property.
- **Servitude** – is the situation where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work. This could be because of the use of coercion, threats or deception.
- **Forced labour** – occurs where the victim is either not free to stop working or not free to leave their place of work. This could be because of the use of coercion, threats or deception. A person is forced to do work they have not agreed to, under the threat of punishment.

- **Forced marriage** – involves situations where a victim gets married without freely and fully consenting because they are coerced, threatened or deceived. It is also where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
- **Debt bondage** – describes situations where the victim has pledged their services as security for a debt. This debt can be real or purported, is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
- **The worst forms of child labour** – is where children are exploited through slavery or similar practices, including for sexual exploitation, or engaged in hazardous work which may harm their health, safety or morals, or where they are used to produce or traffic drugs. It is work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development.
- **Deceptive recruiting for labour or service** – this describes situations where the victim is tricked or coerced into a job where they are paid very little or nothing and cannot leave because of a debt or their passports are taken away.

Where might we see Modern Slavery while working at APM?

Indicators of Modern Slavery can include the following, so be alert if any service users inform you of the following:

- individuals living at the workplace of their employer, located in remote locations that are difficult to access;
- individuals not being paid for the work they undertake or required to work excessive hours;
- individuals being held in debt-bondage (being told they 'still' owe money after having paid off a previous debt);
- an individual's passport being held by their 'employer' in order to keep the individual at work;
- multiple benefit claimants having their benefits being paid into the same account or a third party 'holds' or 'invests' their money for them;
- an individual appears to be subjected to, or threatened with violence, emotional, sexual, verbal or physical abuse or other degrading treatment in connection with their employment;
- an individual confirms they were forcibly married, and / or brought into the country against their will, or that their child is being kept from them to ensure they keep working.

Roles and Responsibilities

It is the responsibility of all APM Group employees, contractors, consultants, and stakeholders to be aware of Modern Slavery risks within their business unit and supply chain, to be able to identify concerns and to report incidents or suspected human rights breaches, including any suspicion of Modern Slavery.

Each business unit within the APM Group must implement its approach to modern slavery risk management and should adopt procedures to ensure ethical sourcing in its operations and supply chain, as is appropriate and relevant to that business unit. These processes should include due diligence to identify, prevent, mitigate and account for Modern Slavery risks or human rights breaches. A business unit should, as far as practicable, encourage their key suppliers or suppliers which are deemed to be of higher risk to complete the APM Modern Slavery supplier questionnaire.

Reporting and Investigation

If you have any suspicions or concerns that any aspect of Modern Slavery may be occurring,

- if you are an employee, you should report the suspected instance in the first instance to your direct manager, who must verify the suspicion or concern raised and then escalate it to a member of the APM legal team, or

- if you are contractor, consultant, supplier or other stakeholder, you should report in the same manner as set out in the Whistleblower Policy or a similar channel of reporting in countries outside Australia.

It is not your role or responsibility to undertake investigations, form conclusions or to act against any person who you suspect of Modern Slavery activities. Once a report is made to the APM legal team, they will organise an investigation in accordance with our Whistleblower Policy.

Training

APM intends to provide training on Modern Slavery to all our employees to further develop their knowledge and means to identify and report any potential Modern Slavery risks. All APM employees and contractors are required to confirm they have read this policy and understand it as part of their induction. APM will engage with any suppliers where we deem there to be potential Modern Slavery risks to improve their awareness and understanding of Modern Slavery concerns.

Risk Management

The APM Group has robust systems in place to ensure sound governance across all operations and high-quality processes and frameworks to carefully plan for and prioritise risk. This enables APM to effectively manage risks through compliance with legislation and alignment with best practices.

APM has undertaken a risk review and will continue to implement processes to identify and address Modern Slavery risks across our operations and supply chains. These processes include due diligence of suppliers where we have identified potential modern slavery risks (our supply chain partners are subject to quality, compliance, and performance checks), adding Modern Slavery provisions into our contract terms and conditions and training and creating awareness of Modern Slavery risks to our employees and other stakeholders.

Supporting Documents

This document is to be used in conjunction with:

- Code of Conduct
- Whistleblower Policy or similar policy in other countries
- [Modern Slavery supplier questionnaire](#)

Business Area Contact

Legal, Corporate Services

Approval and Implementation

Policy Custodian:	General Counsel
Responsible Executive Team Member:	General Counsel
Approving Officer:	APMHSI Board
Approval Date:	24 March 2021
Effective From:	24 March 2021

Review

This policy will be reviewed at least every 2 years.

Version Control

Version	Date	Prepared by	Comments
0.6	15/03/2021	Legal	Draft
1.0	24/03/2021	APMHSI Board	Document approved
1.1	31/05/2022	Group General Counsel	Minor entity name change only