



# Modern Slavery Statement

## 2022

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# Introduction

PeopleIN 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.

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

PeopleIN submits a modern slavery statement that includes all controlled entities. This is undertaken to support a group wide, risk managed system of audit and governance designed to deliver a continuous improvement philosophy to this important area of our business.

At PeopleIN we know our employees are our most valuable asset. We recognise we are the sum of our individual differences, life experiences, knowledge, innovation, creativeness, personal capabilities, and the talents our employees bring to our organisation. Our people represent our culture, our reputation and the company's achievements. We commit to protecting the human rights of all employees including those at risk of exposure to modern slavery practises.

This is the joint modern slavery statement of PeopleIN (and its respective controlled entities) under the Act with respect to the reporting period 1 July 2021 to 30 June 2022 (Reporting Period).

This joint statement covers the activities of PeopleIN as outlined in its [Annual Report PeopleIN Ltd Financial Report](#)



# About PeopleiN

PeopleiN is the largest ASX listed talent solutions company. We deliver innovative solutions to workforce challenges faced by Australia's leading businesses. We operate through three divisional structures: Healthcare and Community, Professional Services and Industrial and Specialist Services.

In FY22 the Group was joined by Perigon Group, GMT Canberra, Vison Surveys, and Food Industry People (FIP) Group. The latter is Australia's premier Pacific Australia Labour Mobility (PALM) scheme provider, placing over 5000 workers from Pacific Island nations in roles supporting Australia's agriculture and food processing sectors. All our new partners were included in the Groupwide modern slavery audit return process conducted in FY22.

The Group's Leadership, supported by our Shared Services Division which includes Finance & Administration, Employee Relations and Work Health and Safety teams, maintain a contemporary policy and procedural platform that supports our day-to-day operations. All of the relevant Group subsidiaries are licensed labour hire providers under the relevant state-based Labour Licensing Act applicable to the industries in which they operate.

## Shared Value

We've aligned our Shared Value framework with the United Nations' Sustainable Development Goals which define a clear plan to address the most pressing challenges facing our world. By doing so we ensure the shared value we create is meaningful to the people, clients, investors and the communities in which we work – both domestically and across the globe.

Our strategy focuses on three shared value pillars: First Nations, Sustainability and Equity & Inclusion. The activities which underpin each utilise the resources, skills and innovation of our organisation to target the societal issues that intersect with our business operations and on which we can have a scalable impact.

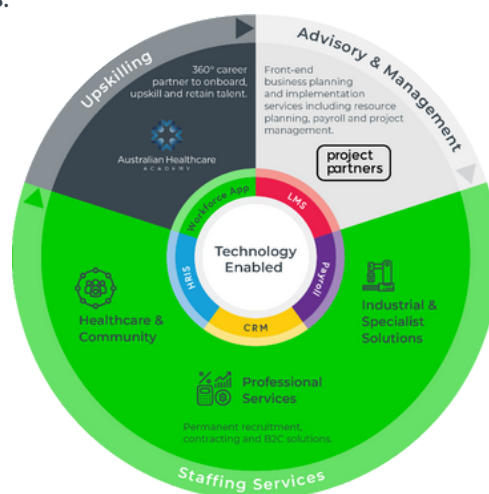


# Profile

We've spent decades carefully building a network of workforce brands that share this passion for quality service for clients, candidates and their teams.

Today our family of brands operates under three key verticals:

1. Industrial and Specialist Services
2. Professional Services and
3. Health and Community



## Our Family of Brands



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 PeopleiN's third report under the Act for the period ending 30 June 2022.

# Corporate Governance

The Directors and Management of the Group are responsible for reviewing and maintaining the corporate governance principles of the Group and ensuring 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. 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 PeopleiN is managed to ensure human rights are protected. The Group's corporate governance statement, which outlines its approach, can be found at <https://www.peoplein.com.au/governance-documents>

As part of its risk management approach to upholding human rights and specifically address modern slavery risks in the Group's operations and supply chains, the Audit and Risk Committee improve the efficiency of the Board. This is achieved 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 advises on the establishment and maintenance of a framework of internal controls for the Company's management to ensure its expectations and standards are understood by all stakeholders. These steps minimise potential risks to human rights.

The committee meets at least twice per annum in Brisbane. During COVID-19, meetings were not disrupted and face to face meetings have returned as a result of easing Government imposed restrictions.

## Covid-19 Recovery

The COVID-19 recovery period has created challenges for recruitment and on-hire providers to increase supply of talented and skilled personnel to our clients. Global movement of personnel continues to be disrupted in a manner not witnessed in many decades. The welfare of the Group's employees remains our primary focus. During this period, we have taken steps to enhance our workplace culture and risk management to eradicate the risk of modern slavery practices or other aberrant activities occurring in our business.

As supply chains remain disrupted, the Group has increased its focus on ensuring providers adhere to the obligations under modern slavery legislation and to promote best practise amongst their workforces. As borders have reopened, we remain vigilant to ensure no worker engaged by the PeopleiN Group is exploited or subject to any modern slavery or human trafficking practice. The addition of FIP Group to the Group business has injected valuable cultural learnings and opportunities for continuous improvement in building capability when engaging migrant and vulnerable workforces. We are committed to delivering best practise pastoral care support for the people of the Pacific Island nations.

The Group continues to follow the directions and advice of all health authorities in safeguarding our workforce and the communities they live in from the spread of Covid19 and other infectious diseases.

# Corporate Governance

Division Area	Main Operations	Supply Chain Location
HealthCare and Community Services	Delivery of contracted nursing services, training and labour hire to clients operating within Australia. Workforce management and supplementary staffing within the Disability and Child Protection sectors across Australia.	Training facility, individual client homes, private and public hospitals, clinics, and healthcare facilities located in New South Wales, Queensland and Victoria.
Professional Services	Delivery of recruitment and contracted IT & Professional Services supply to clients operating within Australia. Focused on Professional Services sales and marketing, executive recruitment, accounting & finance, cybersecurity, data & analytics, consulting, and technical support.	Melbourne, Sydney and Brisbane and internationally in Singapore.
Industrial Specialist Services	Delivery of labour hire and staffing services to clients operating within Australia. Specialising in general staffing services to small and medium- sized businesses across Australia in a wide range of sectors including industrial, childcare, and hospitality. Also provides specialist services such as asset management and contract planting.	Regional Queensland, Brisbane, Melbourne, Sydney, Canberra, Perth, South Australia, and and multiple locations throughout New Zealand.
Shared Services	Support Functions to Groups operations.	Head office in Brisbane supporting offices nationally.



# Our Framework

The Group's approach is to take a continuous improvement approach to minimize the risk of any aspect of modern slavery associating itself with the Group. This allows us to ensure 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 third statement, the Group evaluated its international resources and reviewed its guidance materials to ensure management of risks in our offshore supply chain.

The Group recognises, as defined in the Act, slavery and human trafficking can occur in many forms. This can include 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 the operations of each of our brands.

## Risk of Modern Slavery Practices within the Group & the Supply Chain

We recognise as a supplier of on-hire employees (which accounts of 92 percent of the Group's operations), this activity is considered higher risk under the reporting guidelines. We are mindful that operating in a tripartite relationship model engaging young migrant workers, in remote and regional locations, requires vigilance to combat the risk of modern slavery practices.

The Group is committed to operating our business lawfully and ethically and in only working with clients, host employers and suppliers 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 recognises operational control of employees often rests with our clients. We engage in detailed assessment of host employers to quality assure our risk management approach, aimed at eliminating the risks associated with modern slavery.



## Management and due diligence processes

In the year to 30 June 2022 the Group has reviewed its 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 an annual supply chain risk audit to understand any potential risks
- ▶ Deployed its Modern Slavery questionnaire for all its clients and suppliers of consumables for the period ending 30 June 2022 to uncover if any risks were identified
- ▶ Providing contract terms requiring risk management of supply chain modern slavery risk
- ▶ Regular reviews of our own policies and procedures to support employee wellbeing and proactive disclosures across our workforce
- ▶ Investing in training and resources to raise our workplace leadership capability and management skill base
- ▶ A 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
- ▶ Reviewing our Whistle-Blower policy for anonymous reporting
- ▶ Following Best Practice recruitment practices including visa verification and identity checks
- ▶ Employing qualified managers with the skills and experience to identify risks and manage in accordance with our policies and procedures
- ▶ Conducting annual Modern Slavery training for all managers and employees across the group to understand and identify potential risks
- ▶ Establishing the requirement to conduct more regular payroll reviews to ensure employees are paid correctly against relevant industrial instruments in line with Fair Work Act 2009 (Cth)
- ▶ 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 & Policies

In the year ended 30 June 2022, policies were reviewed 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 across each of our three divisions. The policies reviewed include:

- ▶ The Group Respect@Work framework of policies and process to promote dignity and wellbeing at work
- ▶ A renewed contemporary approach to gender equity and managing aberrant workplace behaviours
- ▶ Training for all workplace leaders in grievance and complaint handling procedures
- ▶ Whistle-Blower Policy
- ▶ Childworker 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 where deemed appropriated 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 2022, the Group applied additional resourcing and expertise to our employee relations support model, to ensure prompt responses to any identified risk. The Group's risk management program comprises a series of processes, structures and guidelines which assist the Group to identify, assess, monitor, and manage its business risk, including any material changes to its risk profile.

PeopleiN 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 clients uphold the same values as PeopleiN, they are required to ensure and 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 there are no practices which could be considered acts of 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 appropriate practice in their supply chains. Each is required to notify the Group as soon as they become 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 PeopleiN and the steps it has taken to ensure that Modern Slavery practices are not taking place in any of its supply chains or in any part of its business.

As an Australian business, PeopleiN continues to preference local suppliers for its PPE and consumables. All suppliers are audited annually to ensure no modern slavery risks are identified.

## Our approach to Grievance & Mediation

The Group has a group whistle-blower policy that allows employees and contractors to raise concerns in a confidential manner. The Group has also introduced a contemporary responsive grievance and complaint management procedure to support our Respect@Work framework. These processes are available to all staff and entities are responsible for ensuring they are adequately explained to all employees during the induction process. The Group has a zero-tolerance approach to any modern slavery risk or any aberrant workplace behaviours which may impact our employees. This channel is available for reporting any modern slavery concerns.

Grievances can also be raised to each entity within PeopleiN 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 & 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.

## Latest Initiatives:

This year the Group committed greater resources and expertise in managing the risk of modern slavery. This included creating the new role of Group Head of Employee Relations to examine our risks and to drive a strategic approach to ensuring we reach and maintain the best possible standards of practice in preventing modern slavery.

This new role examined our audit practice, improved its quality, and then drove a Group wide learning and audit approach involving the appropriate personnel drawn from all Group entities. This resulted in shared learnings and an uplift in procurement practices with resulting quality assurance benefits.

Central to our staff management approach is our new PeopleIN Group Respect@Work policy and procedural framework. The framework elevates the ability of our people to approach and resolve workplace issues and encourages on-hire staff to raise any issues of concern, be they internal or client related. This roll out was supported by a new grievance and compliant management training program delivered to workplace leaders across all divisions.

The Group has also invested in providing all internal staff with access to the GoI learning platform including compulsory content to ensure compliance and culture growth in the areas of workplace discrimination, harassment and the upholding of our corporate values.

## FY23 Focus:

- Ensuring a continuous improvement approach and investing in raising Group capability when identifying and managing any modern slavery risk
- Continuing on-site client assessments at all its on-hired operations
- Continue to ensure all new suppliers and clients received updated commercial terms that incorporate modern slavery requirements
- Continue to train all staff on the group's Code of Conduct and ensuring all staff received modern slavery and Whistleblower training as part of their 90-day induction training
- Assessing 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. Monitoring the number of 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
- Continue compliance monitoring of suppliers and clients as well as internal audits within the Group
- Continuing focus on any opportunities for improvement in pastoral care, processes, systems and wage audits in our PALM business.

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

This Modern Slavery Act Statement is made for the financial year ending 30 June 2022.

The Board of Directors of PeopleIN Limited has approved this statement on behalf of itself and all the other reporting entities covered by this statement on 22 December 2022 and the report shall be updated annually.

**Glen Richards, Chairman**



**21 December 2022**



