

PERSOL Australia Holdings Pty Ltd  
ACN 620 794 130  
December 2024

# Modern Slavery Statement



| Criterion | Description                                                                                                           | Reference Page |
|-----------|-----------------------------------------------------------------------------------------------------------------------|----------------|
| One       | Indentification of the Reporting Entity                                                                               | 3              |
| Two       | Structure, operations and supply chains                                                                               | x              |
| Three     | Risks of modern slavery practices in operations and supply chains of the Reporting Entity and its subsidiaries        | x              |
| Four      | Actions taken by the Reporting Entity and Subsidiaries to assess and address the risks outlined in item 3 above       | x              |
| Five      | How the Reporting Entity assesses the effectiveness of actions being taken to assess and address modern slavery risks | x              |
| Six       | Process of consultation with any entities the Reporting Entity owns or controls                                       | x              |
| Seven     | Other relevant information                                                                                            | x              |

# Acknowledgements

## Australia

Programmed acknowledges the Traditional Custodians on whose ancestral lands we live and work and we pay our respects to their Elders past and present. We acknowledge and respect the deep spiritual relationship that Aboriginal and Torres Strait Islander people have to Country. We also pay our respects to the cultural authority of Aboriginal and Torres Strait Islander people and their nations across Australia.

## New Zealand

E ngā mana, e ngā reo, e ngā iwi o te motu, tēnā koutou katoa.

Ko Programmed tēnei, he kamupene e noho honore ana ki te mahi i raro i ngā tikanga me te wairua o te tangata whenua o Aotearoa me Te Waipounamu.

Kei te ū mātou ki te tiaki i te tangata, me te whai i te tika me te pono. Kei konei mātou ki te kōrero mō te whakaheke i te mānu tukino tangata, arā, te modern slavery, kia haumaruru ai ngā hunga katoa e mahi ana i raro i ā mātou whakahaere.

Nā reira, tēnā koutou, tēnā koutou, tēnā tātou katoa.

To the esteemed leaders, voices, and people of the land, greetings to you all. We are Programmed, a company honoured to work under the guidance and spirit of the tangata whenua of Aotearoa and Te Waipounamu.

We are committed to protecting people and upholding integrity and fairness. We are here to address the importance of eliminating exploitation, known as modern slavery, to ensure the safety and dignity of everyone working within our operations.

## 01 About this Statement

This joint Modern Slavery Statement (**Statement**) is prepared by PERSOL Australia Holdings Pty Ltd ACN 620 794 130 (Programmed), as principal governing body, in accordance with the Australian Modern Slavery Act 2018 (Cth) (the Act) on behalf of its subsidiaries, including the reporting entities listed in Appendix 1. A reference to **Programmed** in this Statement is intended to cover all such entities.

This is Programmed's fourth Statement issued in accordance with the Act. This Statement was reviewed and approved by the board of PERSOL Australia Holdings Pty Ltd (the governing body of the 'higher entity' as defined in the Act) on 20 December 2024. In support of this approval, this Statement has also been reviewed by the Chief Executive Officer of Programmed Facility Management Pty Ltd, Chief Executive Officer of Programmed Property Services Pty Ltd and responsible business unit heads of Programmed's Staffing Business.

Programmed is part of the larger PERSOL Group of companies owned by PERSOL Holdings Co Ltd, listed on the Tokyo Stock Exchange. Programmed is a leading provider in staffing and offshore

solutions, facility management and property services. Programmed recognise the importance of identifying and managing the risk of modern slavery in Programmed's operations and supply chain. Programmed's environmental, social and governance commitments align to the broader sustainability commitments of the:

1. PERSOL Human Rights Policy; and
2. key international principles and standards, including:
  - a. UN Guiding Principles on Business and Human Rights;
  - b. UN Global Compact
  - c. UN Sustainable Development Goals; and
  - d. International Labour Organisation's Standards.



“Respect for human rights is the most important aspect of developing a human resources business.”

Takao Wada, President and  
CEO of PERSOL Group

## 02 PERSOL APAC CEO Message

At Programmed, we are deeply committed to upholding human rights and ensuring ethical practices across all areas of operation. As we present our fourth Statement, we reaffirm our dedication to combating all forms of modern slavery within our operations and across our supply chains.

Programmed's commitment is rooted in the PERSOL Group's vision of "Work and Smile". This vision is our aspiration to enrich society by ensuring that work contributes to happy and fulfilled lives. This vision drives us to foster environments where every individual can thrive, feel valued, and achieve their full potential.

To do this, we are proud to align our efforts with key international principles, including the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the UN Sustainable Development Goals, and the International Labour Organisation's Standards. These frameworks guide us in our mission to create a future where the fundamentals of human rights to freedom, dignity and respect are protected.

Programmed has a strong legacy of successfully creating careers and job opportunities through the services it offers since its inception in 1951. Over the years, we have been instrumental in helping individuals build meaningful careers and achieve their professional goals. This legacy is a testament to our commitment to supporting our workforce and contributing positively to the communities within which we operate.

Our human centric approach to combatting modern slavery risk strongly aligns with Programmed's core values of Personal Safety Leadership, Care and Empathy, Diversity and Inclusion and Customer Service. Our corporate focus is centred on the well-being and dignity of each individual. We believe that respecting and protecting human rights is fundamental to Programmed's business and essential for fostering a positive and ethical work environment.

As a proud subsidiary of the PERSOL Group, we recognise the significant role we play in ensuring that our employees, as well as those within our supply chain, work in environments that honour fair employment practices, respectful treatment, timely payment, and dignified engagement. We are proud of the steps we have taken and will continue to take to eradicate modern slavery and promote human rights.

We invite you to explore this statement to gain insight into our efforts, progress, and our ongoing commitment to mitigating the risk of modern slavery within our operations.

**Francis Koh**  
PERSOL Asia Pacific CEO

# 03

## Our Structure, Operations and Supply Chain



## 3.1 Acquisitions and Divestments

### 3.1.1 Urban Maintenance Systems (UMS)

In December 2023, Programmed announced the acquisition of UMS, an open space and graffiti removal services provider. UMS have adopted key PERSOL Group and Programmed policies, including human rights and modern slavery risk management policies.

The following UMS entities have been added to this Statement.

- UMS Group Pty Ltd  
ABN 15 134 714 551
- Urban Maintenance Systems Pty Ltd  
ABN 38 005 251 954
- Ultum Pty Ltd  
ABN 70 093 425 917
- UMS Advantage Pty Ltd  
ABN 86 003 922 576

### 3.1.2 Programmed Health Professionals

In April 2024, Programmed announced the sale of the Programmed Health Professionals business to focus on core markets of staffing, maintenance and facility management.

Following the divestment of Programmed Health Professionals from the PERSOL Group the following legal entities have been removed from this Statement:

- Programmed Health Professionals Pty Ltd  
ABN 17 007 141 531
- Clincare Pty Ltd  
ABN 86 093 294 332

### 3.1.3 Programmed Offshore

On 30 April 2024, Programmed acquired 100% ownership of the Programmed Atlas Professionals Joint Venture ANZ operations from Atlas Professionals. Programmed Offshore specialises in sourcing experienced and qualified personnel in offshore drilling, catering, marine, production and construction operations.

The following Programmed Offshore entities have been added to this Statement:

- Programmed Offshore Holdings Pty Ltd  
(formerly Atlas Programmed Marine Holdings P/L)  
ABN 69 620 316 252
- Programmed Offshore Pty Ltd  
(formerly Atlas Programmed Marine Pty Ltd)  
ABN 35 009 231 476
- Programmed Offshore (Australia) Pty Ltd  
formerly Atlas Programmed Marine (Australia) P/L  
ABN 44 109 339 433
- Programmed Offshore Energy Services Pty Ltd  
(formerly Atlas Energy Services Pty Ltd)  
ABN 88 662 619 052
- Programmed Offshore (NZ) Holdings Limited  
(formerly Atlas Programmed Marine Holdings (NZ) Ltd)  
NZBN 9429033893594
- Programmed Offshore NZ Limited  
(formerly Atlas Programmed Marine NZ Limited)  
NZBN 9429039706577
- Programmed Offshore Services NZ Limited  
(formerly Atlas Programmed Marine Services NZ Limited)  
NZBN 9429037819705

## 3.2 About our Structure

Programmed is a leading provider of staffing and offshore solutions, facility management and maintenance services across a diverse range of industry sectors including education, health, infrastructure, manufacturing, transport and mining in Australia and New Zealand. Programmed employ more than 30,000 people a year across a broad range of industries who support our ability to service more than 10,000 customers.

Programmed is rich in heritage and dates back to 1951. What began as the Miles Paint Services business, through a combination of organic growth and acquisition, in 1975 became Programmed Maintenance Services. In 2015 Programmed expanded the labour hire, industrial maintenance

and health services capability through the acquisition of the Skilled Group. In 2017, Programmed Maintenance Services was acquired by PERSOL Group.

Whilst Programmed's corporate structure has changed considerably throughout the years, Programmed have long recognised, and continue to recognise that people serve as the foundations of both culture and the quality of service that Programmed provide to customers and the broader community.

This is reflected in Programmed's values of *Personal Safety Leadership, Care and Empathy, Diversity and Inclusion, and Customer Service.*



A summary of our operational structure is highlighted in figure 3.1 below:



Figure 3.1. Programmed's Organisational Structure

## 3.3 Summary of our Operations

### 3.3.1 Programmed's Staffing Business

#### Industrial, Infrastructure and Training Services (IIT)

The Industrial, Infrastructure and Training Service business unit is Australia and New Zealand's largest supplier of managed skilled workforce services and is made up three distinct operating departments:

##### Industrial

The industrial group makes up over half of IIT and provides personnel across a wide variety of industries including transport and logistics, manufacturing, construction, FMCG, trades and telecommunications.

##### Infrastructure

For over 20 years Programmed's Staffing Business has been providing qualified rail safeworking personnel to Australia's leading public and private rail asset owners and operators.

##### Training Services

The Training Services group is a Registered Training Organisation (**RTO**) and Group Training Organisation (**GTO**) that offers customers the capacity to customise training solutions from induction programs through to Certificate III or IV level qualifications. The GTO provides a range of apprenticeship, traineeships and job placement services through a range of different industry segments. In addition, the Training Services arm also offers unique industry specific development pathways such as tailored traineeships to employment in the Community Sector, Defence Industry Pathway traineeships and National Energy Technician Training Scheme (NETTS) program for major oil and gas organisations.

### Energy and Resources

#### Mining and Resources

Programmed is a leading supplier of personnel to mining, resources and oil and gas businesses throughout Australia. Programmed's Staffing Business have and continue to supply resource workforces of over 500 personnel. The mining and resources division have extensive experience in supplying workforces and maintenance services of varying sizes across Australia's resource sector. Programmed's Staffing Business currently supply across a broad scope of classifications to the mining industry including:

- Operators;
- Trainees and Apprentices;
- Trades;
- Semi-skilled;
- White collar professionals; and
- Technical roles.

#### Programmed Industrial Maintenance (PIM)

PIM provides specialist maintenance, shutdown and project services across light and heavy industries. PIM's solutions range from supplementary maintenance crews through to fully outsourced maintenance models. PIM provides a variety of services to customers in the mining and metals, FMCG, energy and utilities, manufacturing, ports, infrastructure and aeronautical sectors across Australia. .

PIM's services in this arena include:

- Mechanical and electrical maintenance;
- Workshop services;
- Shutdown management and execution;
- HVAC services;
- Asset integrity programs and capital works projects;
- Facility management and upgrades;
- Scaffolding services; and
- Specialist recruitment.

## 3.3 Summary of our Operations continued

**Programmed Offshore**

Programmed Offshore is a recruitment and placement operator in the complex offshore and marine sector. The suite of services includes the provision of outsourced temporary workforce solutions in the marine, energy, drilling, construction, maintenance and catering sectors.

**PERSOL**

PERSOL is a sourcing and placement provider in STEM, Government, ICT, Veterans Employment and Training Services (VETS) and other Specialist Recruitment services such as Banking and Finance, Accounting, Health Care, Events and Promotions. PERSOL also specialise in the provision of professional contract and temporary placement services.

**3.3.2 Programmed Property Services (PPS)****Painting**

From national-scale projects involving multiple sites to one-off repaints, the PPS painting business leverages a combination of internal painting and specialist coating teams supplemented by preferred vendor partners. Painting services extend to difficult to access projects and involve abseiling, industrial cleaning, interior and exterior painting, graffiti removal and heritage restoration works.

**Electrical Technologies and Essential Services**

The Electrical Technologies business specialise in the design, implementation and maintenance of audio-visual, data and communications, electrical and lighting systems and provide optimisation services for clients to ensure systems are operating effectively and efficiently.

**Essential Services**

Essential Services operations focus on providing preventative maintenance solutions to building services such as compliance audits, fire services, plumbing, HVAC, and electrical compliance.

**Grounds**

The Grounds business specialise in the provision of grounds maintenance solutions to a range of diverse sectors including local government, parks and commercial enterprise, sports grounds, universities and schools. Works include general grounds, garden, and turf management, water irrigation system design and installation, condition auditing and soil testing, and open space infrastructure management.

**Corporate Imaging and Building Projects**

From single identification signage to complete visual strategies, Programmed Corporate Imaging provide end-to-end signage projects from design to manufacturing, installation, auditing and condition monitoring. Signage services include specialist façade cladding, directional signage, retail fit outs and directional signage projects.

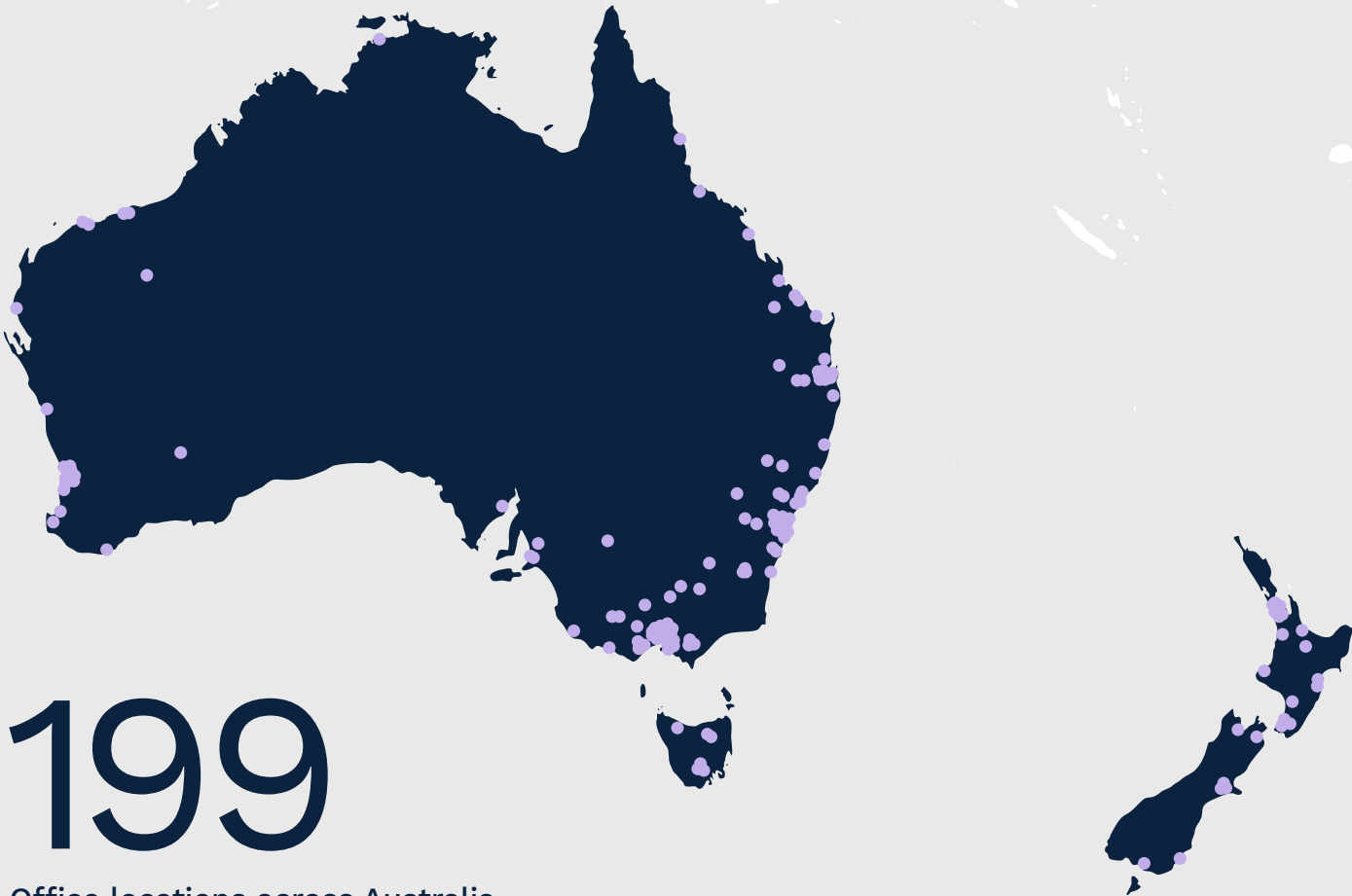
**Building Projects**

Programmed Building Projects provide a complete turnkey solution for fit out and refurbishment works from project scoping and design, make good, modernisation projects, commercial office fit outs, amenity upgrades and space conversions.

**3.3.3 Programmed Facility Management (PFM)**

PFM provides a comprehensive range of facilities management from small repair work to managing large-scale facilities and infrastructure networks. These services extend to provision of large-scale asset management services, through to soft and hard facility management offerings and long-term Public-Private Partnership contracts. The Facility Management division currently offers these services across a range of industries including Universities, Local Government, Correctional Facilities, Private Sector, Airports and Water Infrastructure.

3.3 Summary of our Operations continued



199

Office locations across Australia and New Zealand

30k+

Permanent and casual employees working daily

8,000

Pre-qualified contractors

## 3.4 Overview of our Supply Chain

In 2024, Programmed's supplier and contractor network grew to over 8000 individual vendor companies. The majority of Programmed's supply chain spend is in the following areas:

- Multi-trade contractors such as electricians, plumbers, carpenters, painters, grounds;
- Equipment and plant such as gardening and landscaping materials and equipment, electrical and audio-visual equipment and supplies, plumbing and civil works equipment, signage, construction materials such as concrete, scaffolding and HVAC materials;
- Supplementary outsourced labour hire services;
- Medical services such as pre-employment medical services;
- Consumable and semi-consumable products including chemical-based products such as paints and coatings, weed and pest control, uniforms, stationary, printing and personal protective equipment;
- Technology and communication infrastructure;
- Accommodation, cleaning and food services; and
- Other professional services such as advertising and marketing.

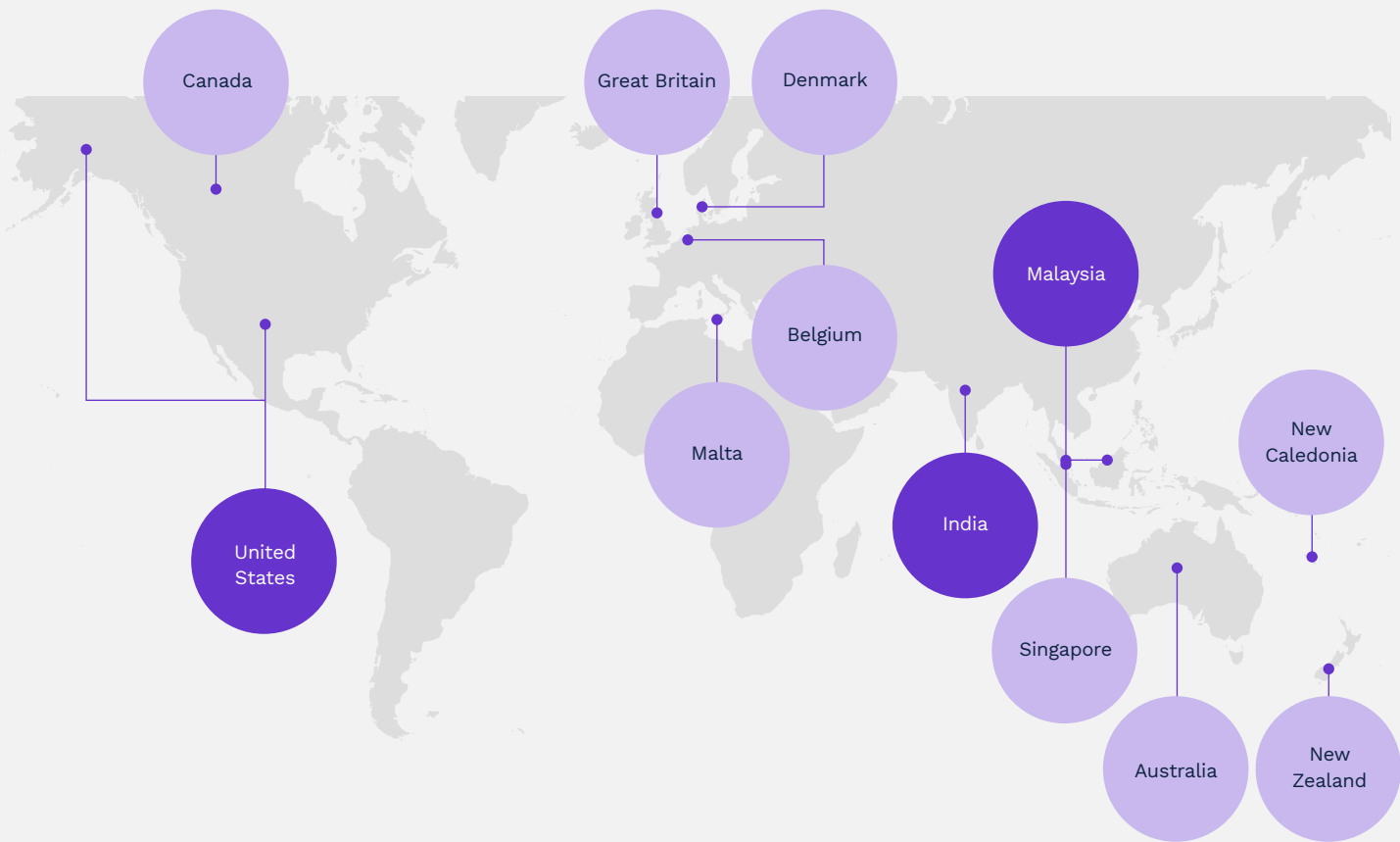
Whilst Programmed operations are predominantly in Australia and New Zealand (ANZ), Programmed sources goods and services outside of ANZ and acknowledges that modern slavery risks exist throughout the globe.

Programmed understand that modern slavery thrives in silence and are committed to continuously improving internal controls to enhance grievance escalation pathways.



We are committed  
to respecting and  
protecting human  
rights wherever we  
perform work.

Figure 3.4 below provides an insight into Programmed’s supply chain, its origin and associated risk.



| Low Risk      |         |         | Medium Risk   |         |         |
|---------------|---------|---------|---------------|---------|---------|
| Country       | % Spend | Vendors | Country       | % Spend | Vendors |
| Australia     | 99.72   | 8386    | Malaysia      | 0.00    | 2       |
| Singapore     | 0.04    | 4       | United States | 0.12    | 23      |
| New Zealand   | 0.07    | 6       | India         | 0.02    | 3       |
| Great Britain | 0.03    | 8       |               |         |         |
| Canada        | 0.00    | 1       |               |         |         |
| Belgium       | 0.00    | 1       |               |         |         |
| Malta         | 0.00    | 2       |               |         |         |
| Denmark       | 0.00    | 1       |               |         |         |
| New Caledonia | 0.00    | 1       |               |         |         |

# 04

## Understanding our Modern Slavery Risks



## 4.0 Understanding Our Modern Slavery Risks

Programmed understand that the nature of the work and services in Australia and New Zealand relies heavily on great people. Programmed, as a people-based operation, recognise the significant responsibility to ensure that Programmed's people and those engaged through Programmed's supply chain are treated fairly, with dignity and respect. Programmed's governance approach is informed by the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the UN Sustainable Development Goals, and the International Labour Organisation's standards.

Programmed also rely on insights from the Global Slavery Index (GSI), third-party screening tools, and internal controls which are all important mechanisms that shape Programmed's governance architecture and now serve as the foundation for safeguarding the human rights of employees and partners within Programmed's supply chain.



## 4.1 Our Governance Architecture

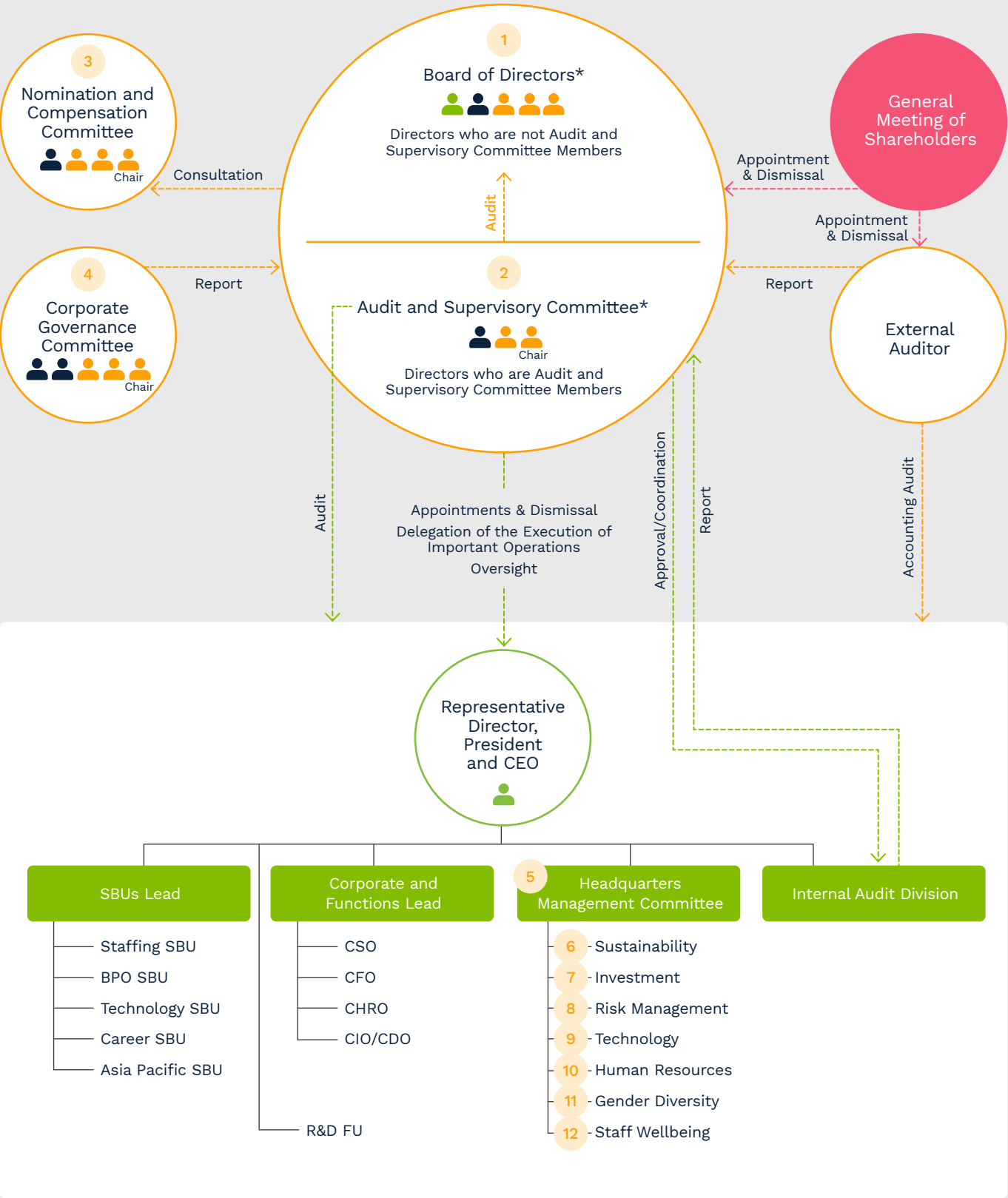
### 4.1.1 PERSOL Group

The PERSOL Group has a formalised and expansive governance structure and provides oversight over all operating Strategic Business Units (SBUs). Programmed is a part of the Asia Pacific SBU.

The Asia Pacific SBU makes up part of the PERSOL Group's broader risk management committee (Committee). The Committee identify, review and mitigate significant risk items including, but not limited to, modern slavery and human rights.



4.1 Our Governance Architecture continued



\* Ratio of Non-Executive Directors 8/9 = 1/2 or above  
Ratio of Independent Directors 6/9 = 1/2 or above



President CEO



Internal Director



Independent Director

## 4.2 Assessing and Respecting Human Rights is a material matter

PERSOL Group, in it’s quest for sustainable growth, recognises the paramount importance of protecting the human rights of all staff. In striving for it’s value goal of creating one million work opportunities by 2030, the PERSOL Group have identified two core materiality categories:

- solving social issues through our business; and
- foundation for achieving sustainable growth.

Supporting these two material categories are eight sustainability issues identified in FY2022 which have a strong emphasis on human rights protection and are aligned to many of the United Nations Social Development Goals (UNSDGs).

### 4.2.1 PERSOL Group Materiality

Extensive quantitative and qualitative methods were applied across the PERSOL Group to identify key material issues. These evaluations assisted in prioritising matters impacting:

1. corporate value;
2. investor alignment; and
3. strategic assessment of key risks and opportunities,

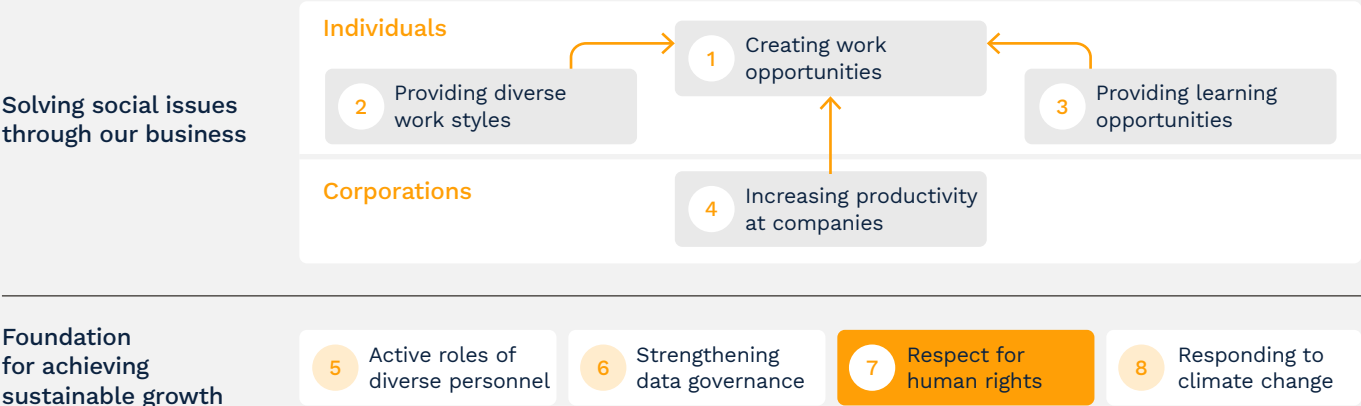
See Figure 4.2.2 on page 22.

Given the PERSOL Group’s strong reliance on human capital, modern slavery risks have been strongly assessed in corporate value assessments. A range of PERSOL Group initiatives were undertaken throughout 2024 with the underlying purpose of strengthening the mechanisms in place which protect the welfare of workers and respect for their human rights. These actions are further summarised under Section 5 Assessing and Addressing Human Rights Risk of this Statement.

For further information on the PERSOL Group approach to human rights can be viewed at: <https://www.persol-group.co.jp/en/sustainability/social/humanrights/>



Figure 4.2.1 PERSOL Group Materiality



**Figure 4.2.2 PERSOL Group Materiality Identification Process**

**Step 1:** List of issues to be considered

- We listed around 300 items and 60 issues by widely referring to global standards, such as GRI<sup>\*1</sup> standards, SDGs<sup>\*2</sup>, and SASB<sup>\*3</sup> standards, as well as the evaluation items of MSCI<sup>\*4</sup> and other ESG rating agencies.

\*1 GRI (Global Reporting Initiative): An international non-profit organization that works to formulate sustainability-related international standards and information disclosure frameworks.

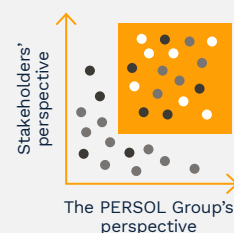
\*2 SDGs (Sustainable Development Goals): International goals that were adopted unanimously at the UN summit held in 2015 and set with the aim of making the world sustainable and better by 2030.

\*3 SASB (Sustainability Accounting Standards Board): A non-profit organisation that sets and provides an ESG information disclosure framework to help investors make decisions from a mid- to long-term perspective.

\*4 MSCI (Morgan Stanley Capital International): A global financial services company that evaluates corporate ESG performance and calculates stock indices. The company's MSCI ESG Ratings are recognized as a world-leading index for ESG investment.

**Step 2:** Assessment of materiality

- We analysed the items and issues that we listed in Step 1 from our stakeholders' perspective (major stakeholders' expectations and requests for the HR service industry and the PERSOL Group) and from the Group's perspective (risks and opportunities seen from the viewpoint of business sustainability) and narrowed them down to 26 issues for further detailed discussion in Step 3.



**Step 3:** Identification of material issues

- The eight materiality issues were identified through repeated discussions by the CEO and other executive officers and deliberations by the Board of Directors on the materiality of each of the 26 issues selected in Step 2.

Discussions by the CEO and other executive officers on the 26 issues selected in Step 2

- Creating work opportunities
- Providing diverse work styles
- Providing learning opportunities
- Increasing productivity at companies
- Active roles in diverse personnel
- Strengthening data governance
- Respect for human rights
- Responding to climate change

### 4.3 Salient Risks within our Operations

Given Programmed’s extensive scope of work, the diverse regions in which it operates, and its wide-reaching supply chain network, there is an inherent risk of modern slavery occurring within its business and supply chains.

Throughout 2024, Programmed has commissioned a range of reviews and improvements to enhance our modern slavery approach and policy frameworks, as detailed further in this Statement. Programmed have assessed the risk of modern slavery within internal operations as low, while acknowledging that higher risks exist within Programmed’s supply chain, which are further elaborated in Section 4.4.

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.

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.

**Table 4.3.1** below highlights specific risks and their likely manifestations within our various divisions

| Division            | Salient Risk                                                                                             | Manifested by                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------|----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Facility Management | <ul style="list-style-type: none"><li>• Servitude</li><li>• Debt bondage</li></ul>                       | <ul style="list-style-type: none"><li>• A failure to identify or apply standard and legal employment practices for our direct and casual pool of workers</li><li>• A failure to identify potential breaches in employment conditions</li></ul>                                                                                                                                                                                                                                  |
| Property Services   | <ul style="list-style-type: none"><li>• Child labour</li><li>• Deceptive recruitment practices</li></ul> | <ul style="list-style-type: none"><li>• Breach or exploitation of visa hours for temporary or permanent employees</li><li>• A breach of Programmed’s Code of Conduct</li></ul>                                                                                                                                                                                                                                                                                                  |
| Staffing            | <ul style="list-style-type: none"><li>• Forced labour</li></ul>                                          | <ul style="list-style-type: none"><li>• A failure to engage with our workers to make appropriate inquiry and observation</li><li>• A failure to create a supportive workplace culture that empowers and encourages our employees to raise concerns with confidence</li><li>• Reports not being treated or investigated with due concern and seriousness</li><li>• Failure to undertake the necessary due diligence on workplace conditions ahead of on-hire placement</li></ul> |

Table 4.3.1 Modern Slavery risks within Programmed

## 4.4 The risk of Modern Slavery within our Supply Chain

Programmed remains committed to further reducing the risk of modern slavery in our supply chain network. Through the course of 2024, Programmed have made positive inroads to refining systems and processes to enhance internal controls across vendor partners and supplier bases. As an example, Programmed made the decision to replace the Informed365 supplier assessment platform. Programmed’s new supplier assessment application provides greater insights into a vendor’s modern slavery risk posture and their quality of internal controls. The platform has proven to be more user-friendly and has yielded a significant increase in the number of supplier evaluations performed. These evaluations have not triggered a cause for concern to warrant further investigation or audit.

In November 2024, PERSOL Holdings established, a group wide Supplier Code of Conduct and Procurement Policy applicable to all subsidiaries including the PERSOL Australia Holdings group of companies. The Supplier Code aims to ensure that all vendor partners adhere to the principles of compliance, human rights, health and safety, fair payment, and environmental responsibility.

Although no modern slavery reports or violations were observed or received by Programmed

in 2024, Programmed acknowledge that continuous improvement efforts are necessary. Whilst Programmed had committed to introducing a modern slavery audit program in 2024, unfortunately Programmed have not yet commenced this program. Programmed have established the foundation framework for including modern slavery within Programmed’s internal audit program for 2025.

Programmed has used the Walk Free Global Slavery Index to evaluate our supply chain’s vulnerability to modern slavery across five dimensions: governance, lack of basic needs, inequality, disenfranchised groups, and conflict effects, as shown in Table 4.4.1 below.

The vulnerability model asses each country and produces an estimation on who and how modern slavery effects each country, respectively. Based on the set of country level indicators, the model assists Programmed to identify and better understand the potential drivers of this crime. The 23 indicators of vulnerability were selected based on alignment with relevant theories and retained after further analysis. The indicators are organised into five major dimensions of vulnerability to modern slavery.

| Country       | % Spend | Vendor Count | % of Vendors | Vulnerability Index |
|---------------|---------|--------------|--------------|---------------------|
| Australia     | 99.72%  | 8386         | 99.38%       | 6.8                 |
| United States | 0.12%   | 23           | 0.27%        | 24.5                |
| New Zealand   | 0.07%   | 6            | 0.07%        | 7.8                 |
| Singapore     | 0.04%   | 4            | 0.05%        | 24.4                |
| Great Britain | 0.03%   | 8            | 0.09%        | 14.3                |
| India         | 0.02%   | 3            | 0.04%        | 56                  |
| Belgium       | 0.00%   | 1            | 0.01%        | 10.8                |
| Malaysia      | 0.00%   | 2            | 0.02%        | 37.2                |
| Malta         | 0.00%   | 2            | 0.02%        | Not Available       |
| Canada        | 0.00%   | 1            | 0.01%        | 10.7                |
| Denmark       | 0.00%   | 1            | 0.01%        | 5.7                 |
| New Caledonia | 0.00%   | 1            | 0.01%        | Not Available       |

Table 4.4.1 Programmed supply chain map to Walk Free Global Slavery Index.

**Table 4.4.2** below highlights the key modern slavery risks that may exist through the Programmed supply chain

| Programmed                   | Potential modern slavery risks through our procurement / supply chain                                                                                                             | How might these risks be manifested through our procurement / supply chain                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Facility Management Services | <ul style="list-style-type: none"> <li>• Servitude</li> <li>• Debt bondage</li> <li>• Child labour</li> <li>• Deceptive recruitment practices</li> <li>• Forced labour</li> </ul> | <ul style="list-style-type: none"> <li>• Soft services (cleaning and catering service providers)</li> <li>• Security Services</li> <li>• Traffic Management services</li> <li>• Procurement of uniform &amp; personal protective equipment</li> <li>• Sourcing from low-cost geographies</li> <li>• Purchasing of food and related goods in our catering operations</li> </ul>                                                                                                                                                                                                                                                                                    |
| Property Services            |                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>• Purchasing of office supplies</li> <li>• Purchase of industrial materials, equipment, and tooling</li> <li>• Engagement of improper / unlicensed external labour hire or visa agencies</li> <li>• Grounds equipment supply</li> <li>• Procurement of painting consumables, tools, and paints</li> <li>• Supply of electrical componentry</li> <li>• Purchasing of office supplies</li> <li>• Graffiti removal service providers</li> <li>• Outsourced painting services</li> <li>• Sanctioned individuals and / or companies</li> <li>• Civil infrastructure and construction refurbishment service providers</li> </ul> |
| Staffing                     |                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>• Engagement of unlicensed external labour hire agencies</li> <li>• Engagement of a third-party labour supplier under a Managed Services Provider (MSP) solution</li> <li>• Procurement of Uniform &amp; PPE</li> <li>• Procurement of promotional items</li> <li>• Purchasing of office supplies</li> <li>• Purchase of industrial materials, equipment and tooling</li> </ul>                                                                                                                                                                                                                                            |

# 05

## How we're Addressing Modern Slavery Risks



## 5.1 Three lines of Defence

The PERSOL Group (**‘PHD’**) transitioned to a **‘Strategic Business Unit (SBU)’** model in 2020 and adopted the principle that **‘the first line is the owner of business risk management’** which is aimed at ensuring accountability for, and appropriate focus on, risk at the operational levels of the business.

The following graphic outlines the PERSOL Group’s risk management structure which is built on the three lines of defence model:

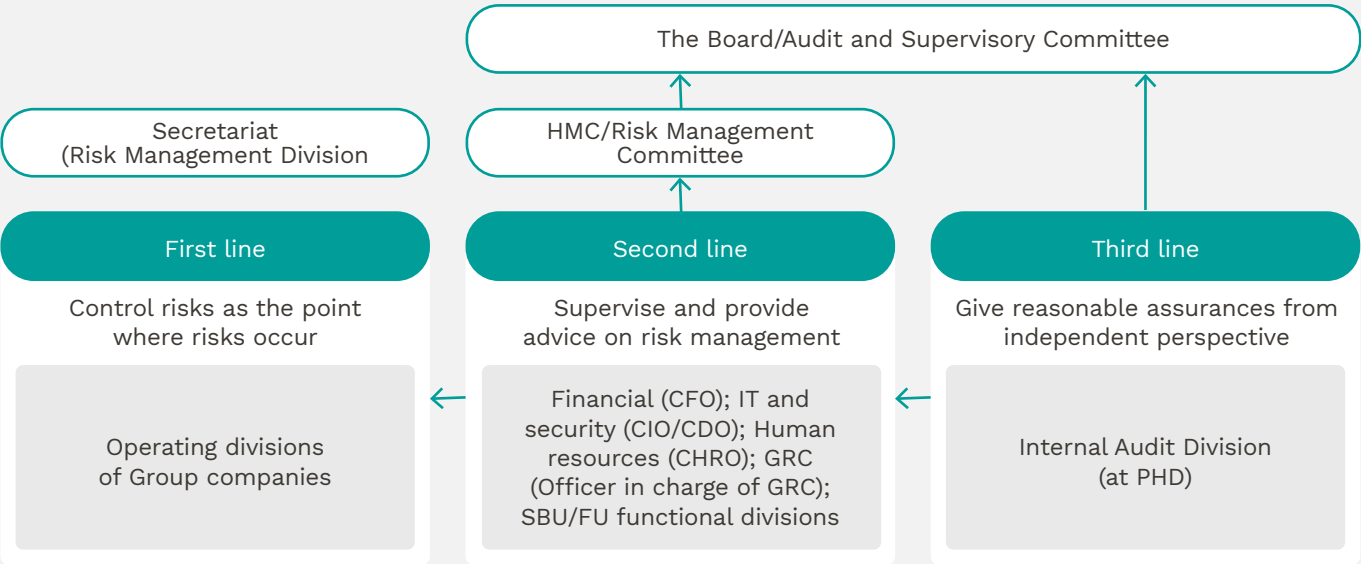
- **First Line** (Group companies/SBU): Executes risk management activities at the point where risks occur in business activities and daily activities.
- **Second Line** (Functional Division): Monitors and supports the risk management activities of each PERSOL Group company
- **Third Line** (Internal Audit Division): Provides reasonable assurance regarding the effectiveness of risk management independently from the First and Second Line.

In addition, the risk management divisions are set out as follows, depending on the content and nature of the risk. These risk management contexts are reported to the Group Risk Management Division within PERSOL Group and the Risk Management Committee:

- **Group-wide risk:** Each functional division of PERSOL Group manages the risk for effective group-wide risk measures. This includes risks related to human rights, including modern slavery which is regarded as a key risk at a group-wide level.

The below model is mirrored across Programmed to ensure governance arrangements align with those in place at a PERSOL Group level. This allows risk information to flow up, down and across the entire PERSOL Group to support informed decision-making with the use of PERSOL Group’s delegation of authority framework and facilitating escalation where required.

Figure 5.1: Three Lines of Defense Model



5.1 Three lines of Defence continued

5.2.1 Third Party Review

In early 2024, the PERSOL Group commissioned a third-party review of the PERSOL Group and Programmed’s approach to the management of modern slavery and human rights risk. Key components of the review included:

- assessing risk areas;
- conducting interviews with organisational stakeholders;
- reviewing and verifying forms of documentary evidence; and
- engaging with Programmed’s procurement function to assess supply chain controls.

Importantly, the review did not identify any forms of modern slavery or human rights abuse or misconduct. The third party review also provided some areas where we can enhance the quality of our existing measures.

Table 5.2.1 highlights the identified areas of improvement and the actions we’ve since taken to address these:

| Improvement Opportunity                                                                                                      | Actions Taken                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Considering Modern Slavery and Human Rights within our Workplace Risk Assessment (WRA) templates for prospective clients.    | Workplace Risk Assessment template has now been updated to assess modern slavery risk exposures to our on-hire employees when evaluating prospective clients.                                                                                                                                                                                                            |
| Creating standard clauses on modern slavery for inclusion into negotiated contracts with client companies.                   | In the context of the services being rendered, specific clauses relating to the client complying with the Modern Slavery Act, informing Programmed of any suspected modern slavery practices, assisting Programmed in investigating these practices, and taking actions to address any breaches. Programmed has the right to terminate the contract in case of a breach. |
| Refine Programmed’s grievance and response policies on support mechanisms available for victims of modern slavery practices. | Modern Slavery grievance and response guide has been drafted and will be extended out across the Programmed group through a range of communication and engagement channels.                                                                                                                                                                                              |

Table 5.2.1 Third party audit findings

## 5.2 Governance and Policies

### 5.2.1 PERSOL Group Human Rights Policy

The PERSOL Group Human Rights Policy commits to upholding international human rights standards, addressing issues such as equality, non-discrimination, privacy, health and safety, freedom of association and the prohibition of forced labor. This policy applies to all employees and vendor partners and provides the foundation for comprehensive adherence across the PERSOL Group.

Governance of this policy is overseen by compliance officers and the Board of Directors who regularly review and update the policy. Additionally, the policy includes due diligence processes to identify and address human rights impacts, grievance management frameworks for reporting issues, and ongoing training and public disclosure to maintain transparency and accountability.

### 5.2.2 PERSOL Group Supplier Code of Conduct

In November 2024, the PERSOL Group released a Supplier Code of Conduct, which mandates strict adherence to principles of compliance, human rights, health and safety, fair payments, and environmental responsibility.

Over the course of 2025, Programmed intends to further align to the PERSOL Group Supplier Code of Conduct and integrate these principles through Programmed's procurement processes and vendor partner onboarding programs.

### 5.2.3 Programmed Code of Conduct

Programmed's Code of Conduct prohibits all forms of forced labour, including the use of force or intimidation. Programmed do not tolerate child labour or the exploitation of children and comply with the International Labour Organisation (ILO) regarding under-age workers.

Programmed's Code of Conduct reflects the values of Personal Safety Leadership, Care and Empathy, Customer Service, and Diversity and Inclusion.

These values set ethical standards and behaviour expectations for employees and Programmed's supply chain. The code guides ethical decision-making and aligns actions with the Programmed values. The PERSOL APAC Board approves the Code of Conduct, and it is included in employee and contractor induction and onboarding programs.

### 5.2.4 Safe and Appropriate Conditions of Work

#### Health, Safety and Wellbeing

The health, safety, and wellbeing of employees, contractors, and the broader community is paramount. Programmed's Health, Safety, and Wellbeing Policy addresses issues like hazardous working conditions, excessive hours, and inadequate safety measures. Programmed are committed to providing safe work environments with compliant safety management systems. These systems are integrated into Programmed's operations and supply chain, and are subject to internal audits and external certification. Programmed's commitments extend through to further documents including a subcontractor handbook and contractor essentials page.

#### Working Hours and Conditions of Work

As a large employer of casual and permanent workforces that also engage a large supply and contractor chain, Programmed recognise the importance of ensuring working hours and conditions of work, including wage compliance, is compliant with applicable local laws and conditions. Programmed has a number of systems in place which monitor working hours, ensure appropriate rest breaks and allow for appropriate compensation in accordance with the relevant wage legislation and bargained agreements (where they exist).

#### System-based Controls

A large portion of Programmed's services are orientated in the provision of temporary staffing solutions. Programmed places critical importance on implementing appropriate controls to mitigate modern slavery risks. Programmed continue to review and enhance technology to tighten modern

## 5.2 Governance and Policies continued

slavery controls to ensure that no employee or on-hire employee through a third party is at risk. These include, but are not limited to:

- Training provided to Branch and Operational teams on modern slavery, rate setting and mapping industrial instruments and payroll.
- Verification controls for setting up new clients / sites confirming that correct industrial instruments and classifications are established in our recruitment and field employee management systems.
- Payroll and rates mapping information is transparently shared with our clients by our Account Managers, ensuring our employees' pay and conditions are correct.
- Reporting on employee tenure relative to Award and Enterprise Agreement levels to identify when an employee is entitled to a tenure-based pay and conditions upgrade.
- Daily automated rates report that compares all job templates that are live in our systems against award rates and flagging any pay discrepancies.
- Automated gated control functionality limits the deployment of contingent labour against prescribed maximum workable hours including limits against visa type or other forms of industry or client prescriptions.

### 5.2.5 Grievance Management Guideline

Programmed recognises the importance of independent investigation and a separate remediation process for reports of modern slavery, other human rights and whistleblowing reports. A guideline has been prepared to provide a framework for a remediation approach and options that will ensure appropriate rigour, independence and separation of roles in the processes of investigation and remediation. The Grievance Management Guideline will be reviewed regularly to ensure Programmed continue to learn, adjust and retain appropriate focus on the needs of the party/parties that may have been affected.



### 5.2.6 Whistleblower Policy

Programmed's Whistleblower Policy aims to encourage the reporting of conduct or behaviour that is inconsistent with Programmed's values, policies and the legislative requirements. The Whistleblower Policy provides an anonymous channel for all employees and associated stakeholders such as ex-employees, relatives of employees and subcontractors to report concerns of suspected or actual misconduct.

Whistleblowing reports, along with potential breaches of human rights, can be made through a dedicated telephone line, email address and through digital workflows configured to maximise confidentiality on Programmed's internal applications.

Programmed utilise various communication channels to promote the Whistleblower Policy including induction training, toolbox talks and intranet communications.

### 5.2.7 Other relevant policies

In support of Programmed's vision of "Work and Smile" and the Programmed values, there are a range of other policies and supporting procedures and systems that Programmed has in place to support ethical and compliant practice. These include:

- Bullying and Harassment Policy;
- Diversity and Inclusion Policy;
- Domestic Violence Guideline;
- Equal Employment Opportunity (EEO) and Discrimination Policy;
- Injury Management Policy;
- Privacy Policy;
- Procurement Policy;
- Sustainability Policy; and
- Workplace Behaviour Policy.

## 5.3 Assessing the effectiveness of our activities

During the last reporting period, Programmed continued to take positive steps towards its goal of the eradication of modern slavery in its supply chain. An update on these commitments along with Programmed's ongoing FY2024 commitments are summarised below:

| FY2024 Commitments                                                                               | Outcomes | Summary of Action Taken                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Perform 2 yearly review of Programmed's Subcontractor Handbook                                   | Ongoing  | The review of the Programmed Subcontractor Handbook in line with the UN Guiding Principles on Business and Human Rights and Global Slavery Index and Commonwealth guidance material and document re-published is currently underway and is envisaged to be completed in early 2025.                                                                                                                                                                                                                                                                                                                                                                         |
| Continue to leverage the Informed 365 platform to evaluate and track supplier risk               | Ongoing  | <p>In October 2024, Programmed transitioned from Informed 365 to start using iPro software which specialises in the assessment and management of modern slavery, ESG, corporate social responsibility and compliance risks. Importantly, the assessment questions cover inherent risks and risk controls to provide key insights on our suppliers. Risk scores and risk categories provide a clear risk profile for individual suppliers and an aggregated overview of our supply chain.</p> <p>Adoption of the assessment process is tracking well with approximately 60% of our supply chain now evaluated with clear improvement actions identified.</p> |
| Review Programmed's vendor prequalification platform and refresh Programmed's vendor inductions. | Ongoing  | <p>We have reviewed and refreshed our vendor prequalification criteria in line with current Commonwealth guidance and UN Guiding Principles. The technology stack that supports our vendor prequalification and onboarding process has been reviewed and new technology is planned to be implemented before the end of FY2025.</p> <p>The modern slavery and human rights content in Programmed's vendor induction content has been refreshed. Further improvements will be made as a key component of the technology stack refresh project.</p>                                                                                                            |
| Update Programmed Contractor Essentials website                                                  | Ongoing  | A review of the guidance and informational resources available to vendors has been undertaken in relation to modern slavery and human rights. Updates to the Programmed Contractor Essentials website will be completed before the end of FY2025.                                                                                                                                                                                                                                                                                                                                                                                                           |
| Include Modern Slavery audits into Programmed internal audit program                             | Ongoing  | Programmed's assurance framework in relation to modern slavery and human rights has been reviewed. Assurance activities have been identified and developed across all three lines-of-defence and implementation is underway. Quarterly internal audits have not yet commenced, however will start prior to the end of FY2025.                                                                                                                                                                                                                                                                                                                               |

## 5.4 Our Future Focus

Moving forward Programmed in collaboration with PERSOL Group, will seek to continue to operate in accordance with our values and make further inroads in identifying and mitigating modern slavery risks throughout PERSOL Group.

| Committed actions in FY2025 | Description of Action                                                                                                                                 |
|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| Supplier Code of Conduct    | Review our supplier and vendor engagement processes and procedures in the context of PERSOL Holdings Procurement Policy and Supplier Code of Conduct. |
| Training and education      | Continue to enhance and build our team’s awareness and knowledge of modern slavery risk through ongoing training                                      |



## 5.5 Consultation and Collaboration

PERSOL Australia Holdings Pty Ltd issued this Statement on behalf of its entities which are set out in Appendix 1. The leadership teams responsible for the subsidiary companies were engaged in a process of consultation to ensure this Statement, the actions taken and future improvements are accurately represented.

This Statement was reviewed and approved by the Board of Directors at the PERSOL Australia Holdings Pty Ltd board meeting held on 20 December 2024, in accordance with the requirement of the Act.



## Trading Entities

The following companies qualify as reporting entities for the purposes of the Australian Modern Slavery Act. The list represents current entities at the time of reporting:

- PERSOL Australia Holdings Pty Ltd
- Autalent Solutions Pty Ltd
- Subsidiaries - Australia
- Programmed Maintenance Services Limited
- Aegis Engineering Support Services (Aust) Pty Ltd
- Allied Technologies Australia Pty Limited
- ATIVO Services Pty Ltd
- BTI Executive Search Pty Ltd (formerly Extra Group Pty Ltd)
- Catalyst Recruitment Systems Pty Ltd
- Clincare Pty Ltd
- HVA Technical Services Pty Limited
- Integrated Maintenance Services Pty Ltd
- Kelly Services Australia Pty Ltd
- Peopleco. Pty Ltd
- PERSOLkelly Australia Pty Ltd (fka Programmed Professionals; Mosaic Recruitment Pty Ltd)
- Pindan Asset Management Pty Ltd
- Programmed Building Services Pty Ltd (formerly Your Force Pty Ltd)
- Programmed Electrical Technologies Ltd (formerly KLM Group Ltd)
- Programmed Essential Services Pty Ltd
- Programmed Facility Management Pty. Ltd.
- Programmed Industrial Maintenance Mining Services Pty Ltd (formerly ATIVO Coal Services Pty Ltd)
- Programmed Industrial Maintenance Pty Ltd (formerly ATIVO Pty Ltd)
- Programmed Industrial Maintenance Services Pty Ltd (formerly Extraman (HR) Pty Ltd)
- Programmed Integrated Workforce Limited
- Programmed Offshore Holdings Pty Ltd (formally Atlas Programmed Marine Holdings P/L)
- Programmed Offshore Pty Ltd (formally Atlas Programmed Marine Pty Ltd)
- Programmed Offshore (Australia) Pty Ltd formally Atlas Programmed Marine (Australia) P/L
- Programmed Offshore Energy Services Pty Ltd (formerly Atlas Energy Services Pty Ltd)
- Programmed Offshore (NZ) Holdings Limited (formerly Atlas Programmed Marine Holdings (NZ) Ltd)
- Programmed Offshore NZ Limited (formerly Atlas Programmed Marine NZ Limited)
- Programmed Offshore Services NZ Limited (formerly Atlas Programmed Marine Services NZ Limited)
- Programmed Property Services Pty Ltd
- Programmed Skilled Workforce Pty Ltd
- Programmed Turnpoint Pty Ltd
- Skilled Group International Pty Limited
- Skilled Healthcare Holdings Pty Ltd
- Skilled Maritime Services Pty Ltd
- Skilled Offshore Pty Ltd
- Skilled Rail Services Pty Ltd
- Skilled Workforce Solutions (NSW) Pty Ltd
- T&C Services Pty Ltd
- Tesa Mining (Aust) Pty Ltd
- Tesa Mining (NSW) Pty Limited
- Tesa Mining (U/G) Pty Limited
- The Tesa Group Pty. Ltd.
- Thomas & Coffey (QLD) Pty Limited
- UMS Group Pty Ltd
- Ultum Pty Ltd
- UMS Advantage Pty Ltd
- Urban Maintenance Systems Pty Ltd
- Waycon Services (NSW) Pty Ltd
- Waycon Services Pty Limited

