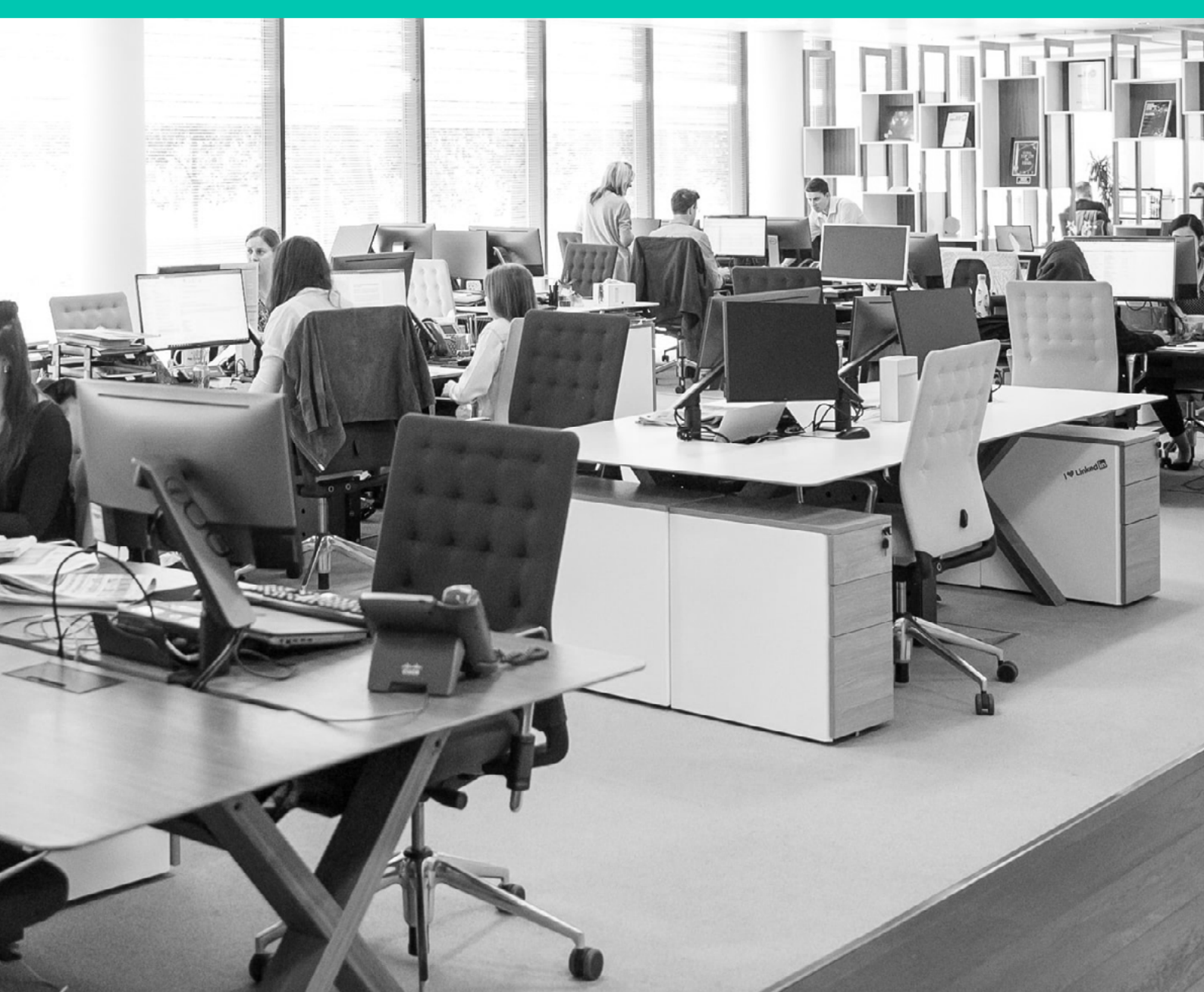


FIRST CONTACT®

Modern Slavery Statement 2021





Introduction

First Contact Pty Ltd (ABN 33 967 281 227), whose registered office is located at Level 5, 415 Bourke Street, Melbourne VIC, 3000 (First Contact®), is Australia's leading licenced workplace specialist company, recognises that all businesses have an obligation to prevent slavery, slavery-like practices and human trafficking and will do all in its respective power to prevent slavery, slavery-like practices and human trafficking within its business and within the supply chains through which it operates. First Contact operates in Australia, Singapore, UK, and USA.

This statement addresses First Contact' obligations and compliance in relation to the 'Modern Slavery Act 2018 (Cth)' ('the Act') and applicable state legislation and highlights the steps we take to ensure there is no slavery or human trafficking occurring within the organisation or its supply chains. We pride ourselves that our most valuable assets have always been its reputation for integrity and fairness in corporate real estate. Maintaining this reputation in workplace services is an essential pre-requisite to our continued success.

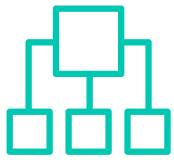
First Contact acknowledges that it is required to submit its modern slavery statement within 6 months from the end of each reporting period.

John G. Ortner, PhD
Managing Director
First Contact



First Contact Pty. Ltd

Modern Slavery Statement 2021




Structure & Operations

First Contact is the leading workplace specialist company and is an expert at recruiting qualified and skilled people, being the market leader in Australia. First Contact operates across the private and public sectors, dealing in permanent positions, contract roles, and temporary assignments.

As of 30th June 2021, First Contact Australia employed over 275 direct staff operating in Melbourne, Sydney, Brisbane, Perth, and Canberra. For the 2020/2021 financial year First Contact in Australia placed people into permanent jobs, and filled temporary jobs, as needed by our clients in corporate real estate across workplace management and operations positions.

We provide our recruitment/labour hire services in the following areas: Banking; Corporate Real Estate; Construction; Energy; Engineering; Executive; Facilities Management; Insurance; IT; Logistics; Manufacturing & Operations; Workplace Services; Office Support; Oil & Gas; Procurement; Property; and Resources & Mining.

First Contact provides its services under First Contact Advisory | Recruitment | Management to mid and large Australian organisations.



***“Modern slavery can take many forms including the trafficking of people, forced labour, child labour, servitude, and slavery. As Australia’s leading workplace specialists, we take our responsibility for supplying staff extremely seriously and are aware of the potential for being targeted by traffickers and unlicensed labour hire providers, in local jurisdictions where licensing is a requirement.*”**

Our own processes around candidate engagement ensure our employees are alert to the signs of exploitation, so that we may take the necessary action promptly and effectively should it be identified. Sectors affected include, but are not limited to, construction & property, Hospitality, engineering & manufacturing and Corporate Real Estate.”

- John Ortner - Director, First Contact



Supply Chain & Risks Evaluation

Recruitment and labour hire supply

Our supply chains include sourcing candidates for our workplace clients. Generally, First Contact does not engage agencies or recruitment firms for candidates for onward supply to our clients, rather we source and facilitate a direct introduction of candidates to our clients.

Regarding labour hire specifically, the Labour Hire Authority identified four high risk sectors which were horticulture, meat processing, cleaning and security. In addition, Victoria has under its labour hire licensing scheme identified hospitality as a high-risk sector, and New South Wales under its labour hire licensing scheme identified property support services and cleaning services as high-risk sectors.

First Contact is licensed, or has applied for the relevant licence, as required under the various state licensing schemes. Of the high-risk sectors, First Contact does not supply workers into the other high-risk sectors.

Suppliers to First Contact

We contract with third parties who provide services to assist with the everyday running of our business, such as partner companies that provide shared services to our host organisations (catering, cleaning services, facilitates, etc) as well as companies who provide office supplies to First Contact office network.

We acknowledge that by virtue of contracting with other parties, whether as a client or as a supplier, there is always some risk that may contribute to modern slavery practices. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant and professional manner by adhering to the First Contact Supplier Code of Conduct. We also expect our suppliers to promote similar standards in their own supply chain.



Actions taken to assess and address modern slavery risks

Candidate engagement

First Contact ensures that strict compliance checks are carried out for all candidates it supplies. We verify the identity of each worker and their right to work before work commences. We also have a dedicated HR and payroll team who audit the relevant modern award or enterprise agreement that a full time or temporary worker is engaged under to ensure they are paid correctly in accordance with the relevant award or agreement.

As part of our commitment to identify and eradicate slavery and human trafficking and to continuously assess and address modern slavery risks, we have in place a process to undertake due diligence on our supply chain network to ensure compliance with legislative obligations, and such compliance forms part of our contractual relationship with suppliers. We will use best endeavours to procure from our suppliers by contract that full compliance with the Act must be achieved.

We will use best endeavours to separately require that any actual or potential risk of breaching the Act that suppliers identify in their own operations or supply chains are communicated to us. This information will be assessed and evaluated appropriately by senior members of First Contact management on an ongoing basis.

Supplier code of conduct

First Contact created a Supplier Code of Conduct that is relevant to all suppliers to First Contact. Suppliers are expected to adhere to the First Contact Supplier Code of Conduct, which includes specific reference to various matters including human rights, anti-bribery and corruption, and modern slavery and human trafficking, and suppliers should have in place a policy recognising, respecting and protecting the human rights of their employees, those of their suppliers and business partners and the communities affected by the suppliers' operations.

1. First Contact' position, which is mirrored in its Supplier Code of Conduct, is that:
2. All employees must be treated in a fair and equal manner and with dignity and respect.
3. Any form of discrimination, victimisation or harassment on any prescribed grounds under commonwealth, state or territory laws should be prohibited. This includes marital status, pregnancy, family responsibilities, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, religious belief, age, trade union activity or any other prescribed ground.
4. All employees must be provided with a clear contract of employment, which complies with local legislation.
5. All slavery and human trafficking laws must be complied with including, but not limited to, the provisions of the Act and any applicable state legislation. Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in Australia or elsewhere, both internally and within their supply chains and other external business relationships.
6. Employees should be free to choose to work for their employer and to leave the company upon reasonable notice.
7. All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions.

Cooperation with client due diligence

Our clients in the private sector operate in many industries and range in size from small businesses through to local subsidiaries of global groups. We also work closely with government departments and agencies across all jurisdictions. First Contact is familiar with participating in clients' audits of their respective supply chains. In doing so, First Contact is also able to observe its clients' own practices on the prevention of modern slavery.



Actions taken to assess and address modern slavery risks

Engagement with suppliers

Over the past reporting period, First Contact engaged with various companies that provide cleaning services to First Contact offices. This involved providing copies of First Contact's Supplier Code of Conduct to these suppliers and enquiring as to the modern slavery compliance practices and procedures. First Contact is also in the process of updating its RFI documentation so that the prevention of modern slavery is specifically addressed as part of First Contact's due diligence prior to contracting with a supplier.

Reviewing contractual documentation

First Contact reviewed its standard form client contract/s to include specific references to modern slavery law compliance in Australia.

Ability for employees to raise concerns at work

All First Contact employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through whistleblowing procedures. First Contact is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in compliance with whistleblowing procedures will be treated confidentially and without fear of retaliation. It is by receiving and evaluating feedback and maintaining a culture of compliance that First Contact can assess the effectiveness of its practices and procedures.

Training

All staff within First Contact are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. We have undertaken to review our policies and procedures to ensure our colleagues have access to any additional information and support they may require with regard to human trafficking, forced labour, child labour, servitude and slavery. All relevant employees in Australia will undertake training on modern slavery and human trafficking and this training is available to all employees to undertake.

Assessing the effectiveness of the actions taken

We will undertake continuous and ongoing assessment of our supply chains by evaluating information that we receive from our suppliers and to promptly act on allegations or findings of involvement in such practices.

We will also set up an annual review process whereby members of senior management will review our policies and procedures and our response to modern slavery.



Looking forward

Over the next reporting period, First Contact will continue to assess ways to reduce the risks of modern slavery and some steps to be taken will include:

- In August 2021, after a considerable dialogue with property groups across our First Contact offices, we will evaluate and update office supplies and cleaners, to the First Contact office network to assess their modern slavery policies and processes.
- Update First Contact' RFI process so that potential suppliers and clients must formally disclose their modern slavery risk mitigation strategies.
- From July 2021, increase the number of First Contact employees who are provided with dedicated training on modern slavery laws.
- By September 2021, publish First Contact' Supplier Code of Conduct across the organisation.
- Set up an annual review process with management and key stakeholders across the organisation.

This statement is made pursuant to the Act and constitutes First Contact' slavery and human trafficking statement in respect of the 2021-22 financial year and is approved by the board of directors of First Contact.

John G. Ortner, PhD | Managing Director
First Contact



FIRST CONTACT®

Version History

The policy described above is subject to revision from time to time at the discretion of management as deemed appropriate.

Date	Version #	Revised Subheading	Comments
15/08/2021	1.02		