

# PREVENTION OF AND REPORTING ON, MODERN SLAVERY POLICY

Oakpont Professionals Pty Ltd

Statement for 2023-2024 reporting year  
March 2024

## 1 Purpose

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The Prevention of and Reporting on, Modern Slavery Policy provides procedural guidance for employees who have workplace responsibilities as defined in this policy.

## 2 DEFINITIONS

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The following terms are used in this document and are included in the ***Oakpont Definitions Register***.

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|----------------------------|---|
| <b>Board</b>               | The Board of Directors of Oakpont Professionals Pty Ltd (ACN 638 803 611).  |
| <b>CEO</b>                 | The Chief Executive Officer and Managing Director of Oakpont.   |
| <b>Company</b>             | Refers to Oakpont Professionals Pty Ltd (ACN 638 803 611), its subsidiary companies, operating divisions, and business units.   |
| <b>Company Secretary</b>   | The Company Secretary of the Company  |
| <b>Company Secretariat</b> | The office of the Company Secretary   |
| <b>Connected Person</b>    | In relation to a Director, employee, or contractor: <ul style="list-style-type: none"><li>■ their spouse or domestic partner and child or stepchild and immediate family;</li><li>■ a relative who has shared their household for at least 12 months as at the date of the relevant conduct;</li><li>■ companies that are associated with them, or their connected persons by virtue of them holding (together or separately) 20% or more of the securities or controlling the exercise of 20% or more of the voting power at any general meeting;</li><li>■ a trustee where the beneficiaries of the trust include them or any of their connected persons;</li></ul> |

- their business partners and business partners of their connected persons; and
- companies in which they are a director, or a senior executive concerned in, or taking part in, the management of the Company

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|-------------------------|--|
| <b>Contractor</b>       | An individual, company or business that carries out work, performs services or provides materials or equipment, for Oakpont under a contract and includes subcontractors and suppliers |
| <b>Corporations Act</b> | The Corporations Act 2001 (Cth).   |
| <b>Director</b>         | Any person who is appointed to the Board and includes alternate directors  |
| <b>Oakpont</b>          | Oakpont Professionals Pty Ltd (ACN 638 803 611), its subsidiary companies, operating divisions, and business units.  |
| <b>Public Official</b>  | Includes public servants, employees of government owned or controlled enterprises, and any person who is standing for public office or is elected or appointed to any public office.   |

### 3 Introduction

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Oakpont Professionals Pty Ltd ABN 40 638 803 611, registered office Level 1, 28 Ainslie Place, Canberra ACT 2601 ('Oakpont'), an Australian specialist recruitment and agency worker/labour hire 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.

This statement addresses Oakpont's 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. One of our company's most valuable assets has always been its reputation for integrity and fairness. Maintaining this reputation within our market is an essential pre-requisite to our continued success.

#### 3.1 Oakpont' structure & operations

Oakpont is an Australian proprietary company that is a wholly owned subsidiary of Oakpont Pty Ltd, an Australian private company.

Oakpont is a specialist recruiting company and is an expert at recruiting qualified, professional, and skilled people in Australia. Oakpont operates across the private and public sectors, dealing in permanent positions, contract roles and temporary assignments.

We provide our recruitment and job agency/labour hire services in the following areas: Accountancy & Finance; Banking; Contact Centres; Executive; Facilities Management; Technology; Office Support; Policy & Strategy; Procurement; and Sales.

Modern slavery can take many forms including the trafficking of people, forced labour, child labour, servitude, and slavery. As an Australian recruitment expert, 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, engineering & manufacturing, and health & social care.

## 4 Oakpont' supply chains & risks of modern slavery

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### 4.1 Recruitment and agency worker/labour hire supply

Our supply chains include sourcing candidates for our clients. This may involve the introduction by external agencies to Oakpont of candidates for onward supply to our clients, or the direct introduction of candidates to our clients by Oakpont.

With regard to labour hire specifically, the final report of the Migrant Workers' Taskforce handed down in March 2019 identified four high risk sectors which were horticulture, meat processing, cleaning, and security. In addition, Victoria under its labour hire licensing scheme identifies poultry processing as a high-risk sector, and South Australia under its labour hire licensing scheme identifies high-risk sectors.

Oakpont is licensed as required under the various state and territory licensing schemes. Of the high-risk sectors, Oakpont does not supply workers into the high-risk sectors.

### 4.2 Suppliers to Oakpont

We contract with third parties who provide services to assist with the everyday running of our business, such as IT service providers and property management companies (who, for example, may provide cleaning services to our offices) as well as companies who provide office supplies to our 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 Oakpont Supplier Code of Conduct. We also expect our suppliers to promote similar standards in their own supply chain.

## 5 Actions taken to assess and address modern slavery risks

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### 5.1 Candidate engagement

Oakpont 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 supply commences. We also have a dedicated temporary worker payroll team who audit the relevant modern award or enterprise agreement that a 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 Oakpont management on an ongoing basis.

### 5.2 Supplier Code of Conduct

Oakpont created a Supplier Code of Conduct that is relevant to all suppliers to Oakpont. Suppliers are expected to adhere to the Oakpont 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.

Oakpont' position, which is mirrored in its Supplier Code of Conduct, is that:

- Employees should be free to choose to work for their employer and to leave the company upon reasonable notice
- All employees must be provided with a clear contract of employment, which complies with local legislation
- All employees must be treated in a fair and equal manner and with dignity and respect
- 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
- 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
- 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

### 5.3 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. That being the case, Oakpont is familiar with participating in clients' audits of their respective supply chains. In doing so, Oakpont is also able to observe its clients' own practices on the prevention of modern slavery.

### 5.4 Reviewing contractual documentation

Oakpont reviewed its standard form client contract to include specific references to modern slavery law compliance.

### 5.5 Ability for employees to raise concerns at work

All Oakpont employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through whistleblowing procedures. Oakpont 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 Oakpont can assess the effectiveness of its practices and procedures.

### 5.6 Training

All staff within Oakpont 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.

### 5.7 Assessing the effectiveness of the actions taken

In the 2024-25 reporting year, Oakpont will complete an assessment of the effectiveness of this policy.

### 5.8 Publish Oakpont' Supplier Code of Conduct

Oakpont created and published its Supplier Code of Conduct, a formal company document requiring Oakpont' suppliers to operate ethically, professionally, and to be legally compliant in all respects including, relevantly, in relation to modern slavery. The document is furnished to Oakpont' recruitment services suppliers (that is, second-tier suppliers who assist Oakpont in providing Oakpont' recruitment and managed services to Oakpont' clients) and to our office services suppliers (being those suppliers who provide services linked to our facilities management requirements). Oakpont will continue to do so.

## 6 Looking forward

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Over the next reporting period, Oakpont will again continue to assess ways to reduce the risks of modern slavery.

Having completed our first year of reporting, and having assessed the effectiveness of the steps taken by our business to prevent modern slavery practices occurring at Oakpont and any prevalence of this within Oakpont's supply chain, Oakpont intends on taking the following steps over the next 12 months:

- Conducting an audit of current suppliers to assess their modern slavery policies and processes, with the focus being on suppliers of financial services to Oakpont.
- Having read the items raised in ACSI's 'Modern Slavery Risks, Rights & Responsibilities' paper, considering whether it is appropriate to create a more sophisticated approach to auditing and responding to modern slavery risk, including:
  - Engaging with suppliers to establish where their services and products are procured.
  - Considering whether Oakpont has applied its supply chain mapping beyond tier one suppliers.
  - Considering whether it is appropriate for Oakpont to create a centralised approach to the collection of supply chain data.
- Identifying whether our suppliers or clients operate in high-risk geographies in relation to labour standards.
- Designing a response process following the identification or disclosure of modern slavery breaches

We will continue to:

- Require potential suppliers to formally disclose their modern slavery risk mitigation strategies as part of Oakpont's RFI process.
- Increase the number of Oakpont employees who are provided with dedicated training on modern slavery laws.
- Regularly review our standard form contracts and actioning updates when and, if required, hold an annual review process with members of senior management

This statement is made pursuant to the Act and constitutes Oakpont's slavery and human trafficking statement in respect of the 2023-24 reporting year and is approved by the principal governing body of Oakpont, being its board of directors.



## 1. Document details

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|-------------------------------|--------------------|
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