

Modern Slavery Statement 2023









Introduction



First Contact Group Pte Ltd, whose registered office is located at 160 Robinson Road, #14-04 Singapore 068914 (First Contact®), is Asian Pacific'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, slaverylike practices and human trafficking within its business and within the supply chains through which it operates. First Contact operates in Australia (First Contact Pty Ltd), Singapore (First Contact Pte Ltd), UK (First Contact Limited), and USA (First Contact, Inc).

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

CEO & Managing Director

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First Contact

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 1st January 2023, First Contact Group employed over 325 direct staff operating in Melbourne, Sydney, Brisbane, Perth, Singapore, New York, and London. For the 2021/2022 financial year, First Contact 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 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 - CEO & Managing 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 highrisk 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.

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.

Image Credit: ANZ Docklands head office

Actions taken to assess and address modern slavery risks



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.

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

- 1. All employees must be treated in a fair and equal manner and with dignity and respect.
- 2. 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.
- 3. All employees must be provided with a clear contract of employment, which complies with local legislation.
- 4. 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. Employees should be free to choose to work for their employer and to leave the company upon reasonable notice.
- 6. 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.

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John Ortner

john.ortner@firstcontact.co
+61 3 9005-4931

Version History		
Date	Version#	Comments
13 Aug 2021	1.01	
18 May 2022	1.10	Updated for 2022
23 Mar 2023	1.20	Updated Introduction







