PERSOL Australia Holdings Pty Ltd
ACN 620 794 130
Published: December 2025

Modern Slavery Statement

PERSOL | PROGRAMMED

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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 haumaru 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, the reporting entities listed in Appendix 1, for the reporting period of 01 April 2024 to 31 March 2025, which denotes the financial reporting year. A reference to **Programmed** in this Statement is intended to cover all such entities.

This is Programmed's fifth 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 1st December 2025. In support of this approval, this Statement has also been reviewed by the APAC Executive member and Chief Executive Officer of Programmed Facility Management Pty Ltd and APAC Executive member, the 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 recognises the importance of identifying and managing the risk of modern slavery in its operations and supply chain. Programmed's environmental, social and governance commitments align to the broader sustainability commitments of:

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

Stephen Leach
PERSOL Asia Pacific CEO

03

Our Structure, Operations and Supply Chain

3.1 Acquisitions and Divestments

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

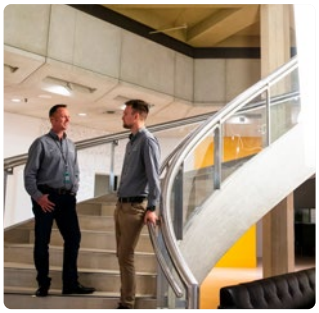
3.2 About our Structure

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 has 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:

PERSOL Australia Holdings Pty Ltd
ACN 620 794 130

Autalent Solutions Pty Ltd
ACN 620 805 647

Programmed Maintenance Services Ltd
ACN 054 742 264

Staffing

Industrial, Infrastructure and Training Services
Blue collar temporary and permanent placement in industrial and rail settings. Provision of technical and vocational skills training through our Group Training (GTO) and Registered Training Organisation (RTO)

Energy and Resources
Mining operation solutions, industrial maintenance, shutdown, and fabrication services. Provision of offshore recruitment and crewing services including marine, drilling, construction, maintenance and catering personnel.

PERSOL
Sourcing professional temporary and permanent staff across industry.

Property Services

Commercial Paint
Commercial painting, protective coatings and industrial cleaning services

Electrical Technologies
Electrical, audio visual, data and communication services

Open Space
Grounds, sports, turf and open space infrastructure maintenance services

Building Projects
Signage manufacturing to commercial sign installation and maintenance, fitout and refurbishment works, minor building works and upgrades

Urban Maintenance
Provision of graffiti removal services in urban work environments.

Facility Management

Private Public Partnerships
Delivering operational responsibility across designers, builders, engineers, consultants and equity partners in a long-term PPP.

Asset Management
Providing a seamless end-to-end asset management practice through certified asset management practices, and innovative digital asset management capture.

Integrated Services
Integrated services across Hard and Soft Facility Management and specialist services in Cleaning and Catering

Maintenance
Provision of essential services on critical infrastructure, delivering reactive and preventative maintenance.

Programmed Building Services
Programmed offers a full scope of architectural services through Programmed Building Services, an architectural company approved by the Architects Registration board of Victoria.

Figure 3.1. Programmed's Operational 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 supplies 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 also provides specialist maintenance, shutdown and project services across light and heavy industries. Our Energy & Resources solutions range from supplementary maintenance crews through to fully outsourced maintenance models. Programmed provides a variety of services to customers in the mining and metals, FMCG, energy and utilities, manufacturing, ports, infrastructure and aeronautical sectors across Australia.

Programmed's Staffing business also provides 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.

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 Facility Management

Programmed Facility Management 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 business currently offers these services across a range of industries including Universities, Education, Mining and Resources, Local Government, State Government, Correctional Facilities, Private Sector, Airports, Utilities and Water Infrastructure.

3.3.3 Programmed Property Services

Commercial Painting

From national-scale projects involving multiple sites to one-off repaints, the Commercial Painting service 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 service specialises 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 operations focus on providing preventative maintenance solutions to building services such as compliance audits, fire services, plumbing, HVAC, and electrical compliance.

Open Space

The Open Space service specialises 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.

Signage Solutions

From single identification signage to complete visual strategies, the Signage Solutions service provides 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.

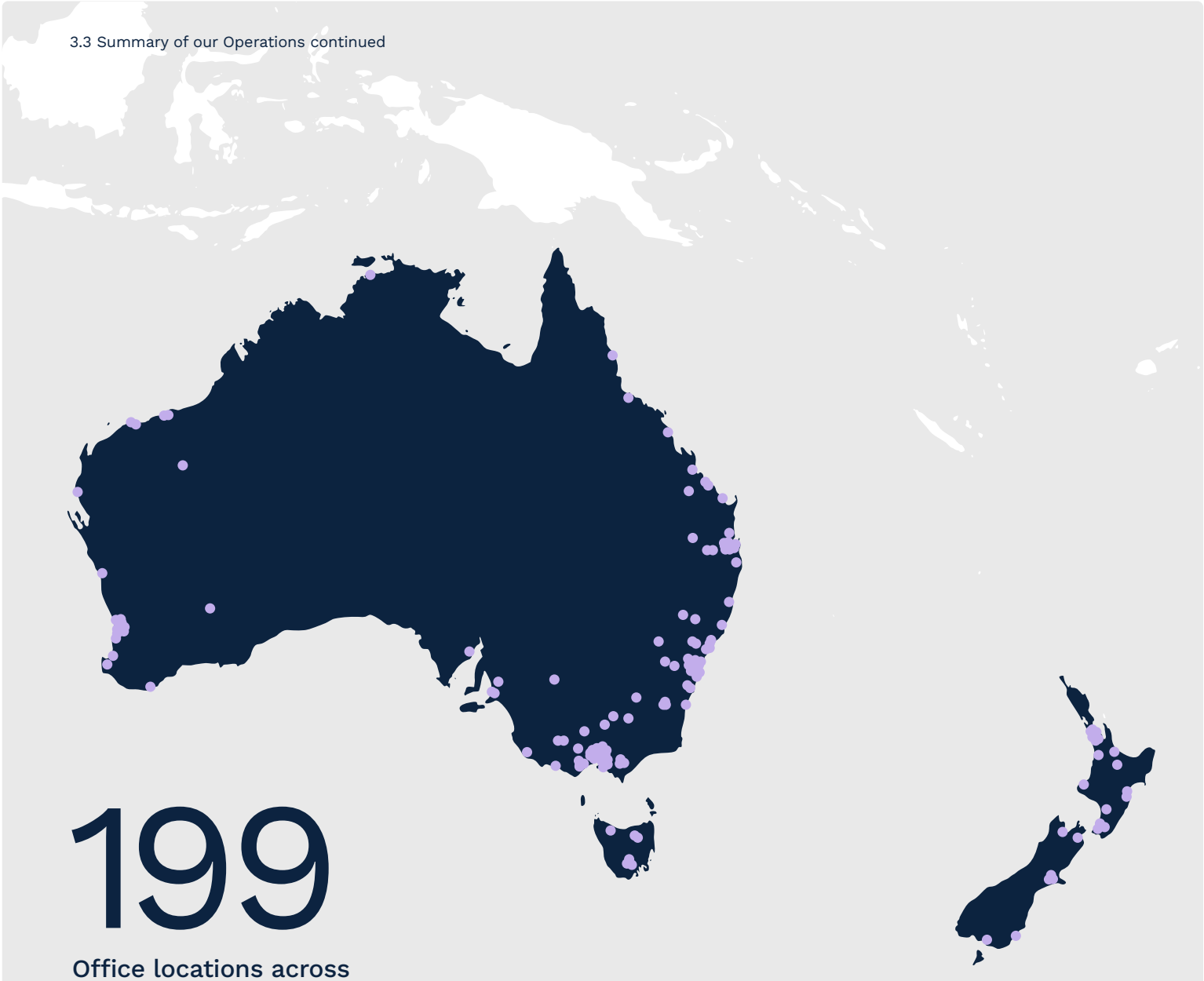
Building Projects

The Building Projects service provides 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.

Urban Maintenance

The Urban Maintenance service provides ongoing graffiti management with the ability to monitor, identify and deliver solutions to enhance the profile of our clients. This includes street infrastructure maintenance, site remediation and upgrades, as well as high pressure cleansing, litter and hard waste removal.

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

Since the last Reporting Period, Programmed's supplier and contractor network has grown to over 8000 individual vendor companies. The majority of Programmed's supply chain spend is in the following areas:

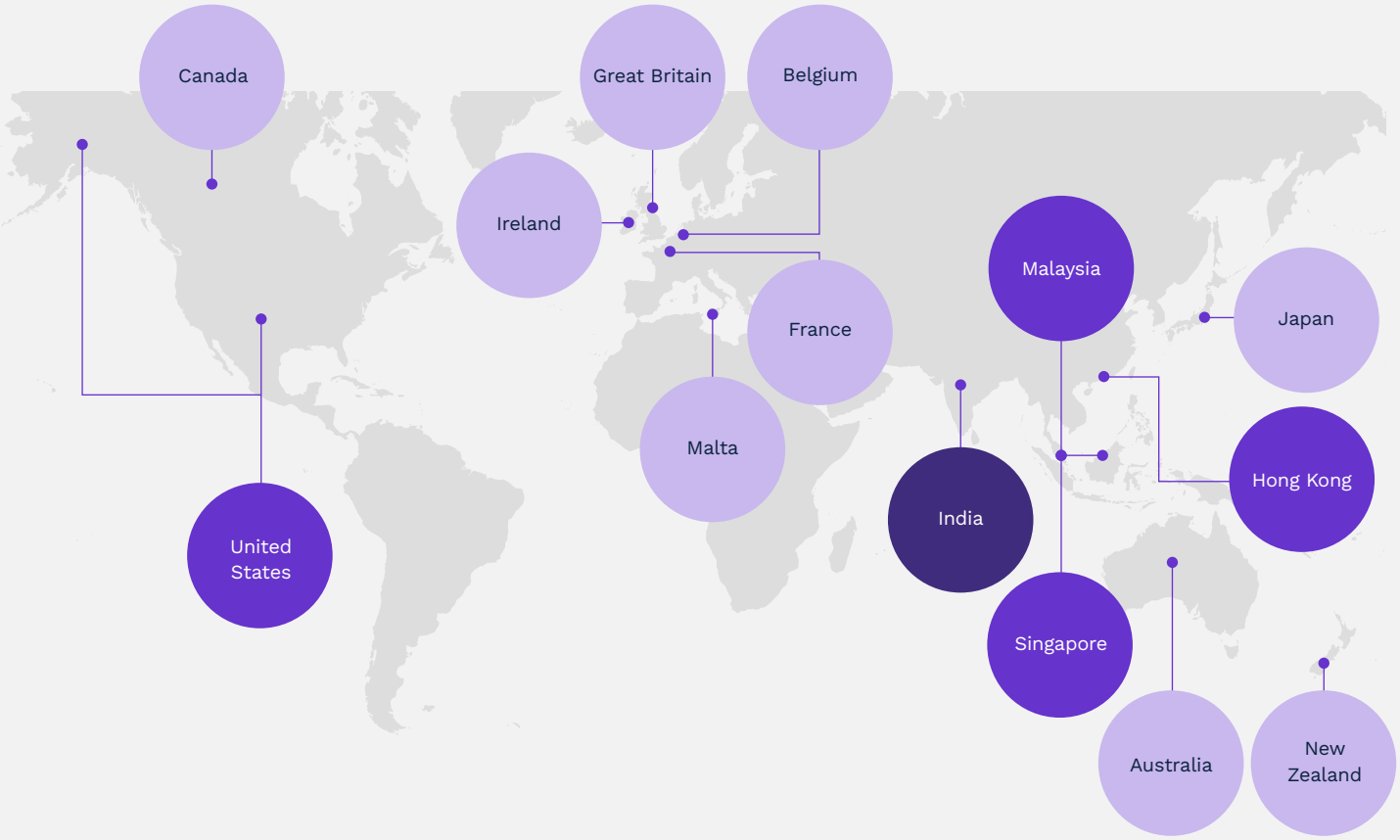
- Multi-trade contractors such as electricians, plumbers, carpenters, painters, grounds;
- Equipment and plant such as gardening and landscaping materials and equipment, electrical and audio-visual equipment and supplies, plumbing and civil works equipment, signage, construction materials such as concrete, 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, stationery, 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 understands that modern slavery thrives in silence and Programmed is 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 Country risk.



Low Risk

Country	% Spend	Vendors
Australia	98.51	5971
Japan	0.07	1
New Zealand	0.04	3
Great Britain	0.03	3
Belgium	0.00	1
Canada	0.00	2
Ireland	0.00	1
France	0.00	1
Malta	0.00	1

Medium Risk

Country	% Spend	Vendors
Malaysia	0.67	4
United States	0.07	17
Singapore	0.59	4
Hong Kong	0.00	1

High Risk

Country	% Spend	Vendors
India	0.02	2

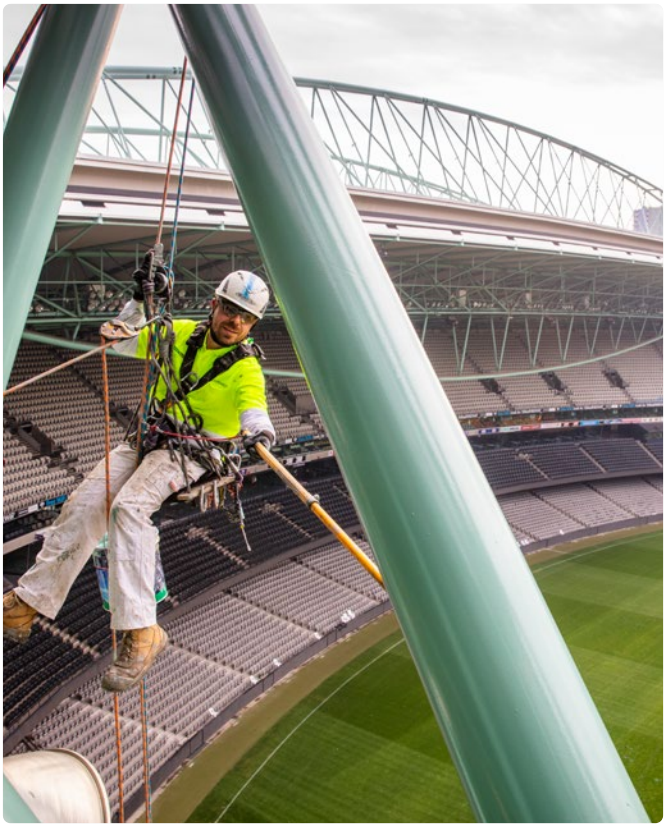
04

Understanding our Modern Slavery Risks

4.0 Understanding Our Modern Slavery Risks

Programmed understands that the nature of the work and services in Australia and New Zealand relies heavily on great people. Programmed, as a people-based operation, recognises 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 Convention and standards.

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



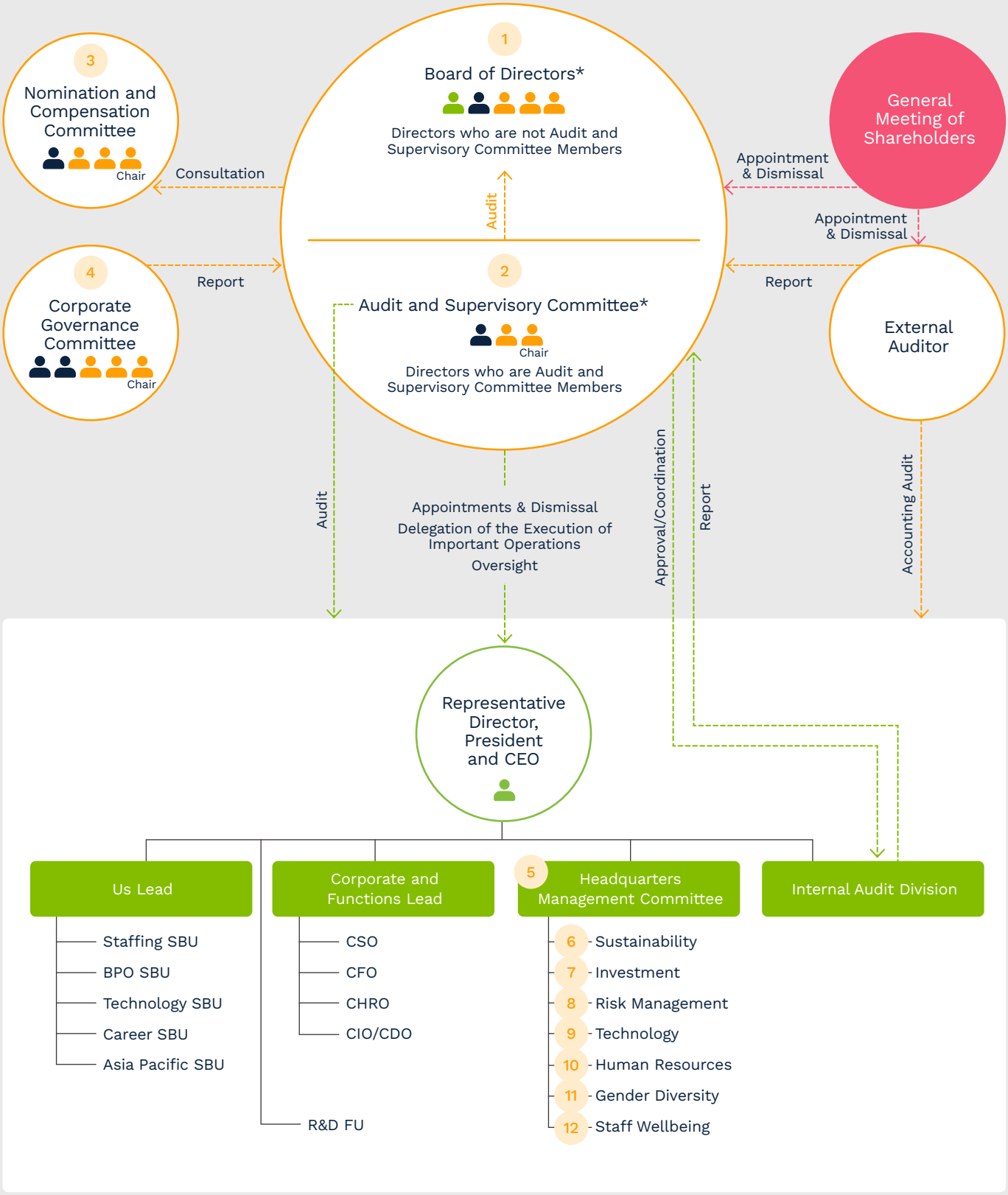
4.1 Our Governance Architecture

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 its quest for sustainable growth, recognises the paramount importance of protecting the human rights of all staff. In striving for its value goal of creating one million work opportunities by 2030, the PERSOL Group has 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 remain current today, which have a strong emphasis on human rights protection and are aligned to many of the United Nations Sustainable 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 the Reporting Period 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

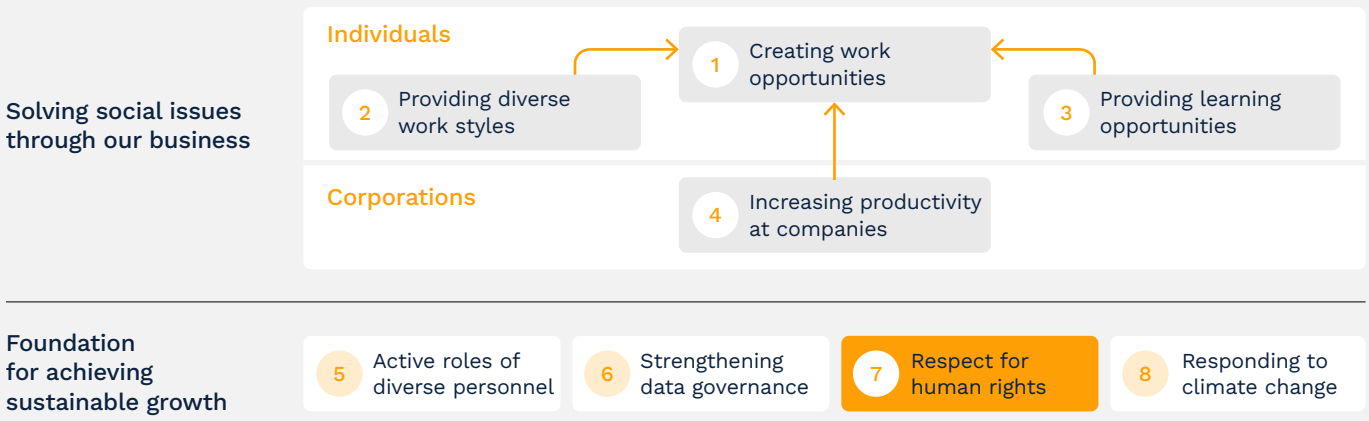


Figure 4.2.2 PERSOL Group Materiality Identification Process

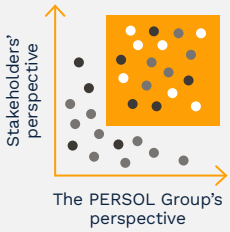
Step 1: List of issues to be considered

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

*1 GRI (Global Reporting Initiative): An international non-profit organisation that works to formula 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.

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. During the current Reporting Period, Programmed commissioned a range of reviews and improvements to strengthen its modern slavery approach and policy frameworks, as detailed in this Statement.

Programmed has assessed the risk of modern slavery within its internal operations as low, while recognising that higher risks may exist within its supply chain. These risks are further described in Section 4.4.

As at the date of this Statement, Programmed has not identified any instances of modern slavery across its operations, suppliers or subcontractors. Programmed does not knowingly permit any form of modern slavery to be used in its business, by its directors, officers, employees, agents, representatives, contractors or subcontractors.

Programmed acknowledges that identifying and addressing issues of modern slavery is an ongoing obligation, as modern slavery can occur in any industry or sector and has severe consequences for affected individuals. As part of this Reporting Year's assessment process, Programmed has again reviewed its suppliers and has not received any additional reports indicating high-risk modern slavery concerns.

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

Division	Salient Risk	Manifested by
Facility Management Property Services Staffing	• Servitude • Debt bondage • Child labour • Deceptive recruitment practices • Forced labour	• A failure to identify or apply standard and legal employment practices for direct and casual workers • A failure to identify potential breaches in employment conditions • Breach or exploitation of visa work hours for temporary or permanent employees • A breach of Programmed's Code of Conduct • A failure to engage with workers to make appropriate inquiries and observations • A failure to create a supportive workplace culture that enables and encourages employees to raise concerns with confidence • Reports not being addressed or investigated with appropriate concern and seriousness • A failure to undertake the necessary due diligence on workplace conditions ahead of on-hire placement

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 its supply chain network. Throughout the Reporting Period, Programmed made meaningful progress in refining systems and processes to strengthen internal controls across vendor partners and supplier groups.

During the Reporting Period, Programmed replaced the Informed365 supplier assessment platform with a new intelligent modern slavery assessment system powered by Ipro. This system is underpinned by the Slavery and Trafficking Risk Template developed by the Social Responsibility Alliance, which is widely recognised as a leading framework for assessing modern slavery and labour rights risks. The new platform provides improved visibility of a supplier's modern slavery risk posture and the strength of their internal controls. It is also more user-friendly and has resulted in a significant increase in the number of supplier evaluations completed.

At the end of the Reporting Period, approximately 30% of Programmed's suppliers had been targeted for assessment based on the potential for medium to high modern slavery risk. Assessment results indicate that, of the suppliers assessed, no suppliers to date have been categorised as high-risk with high levels of inherent risk.

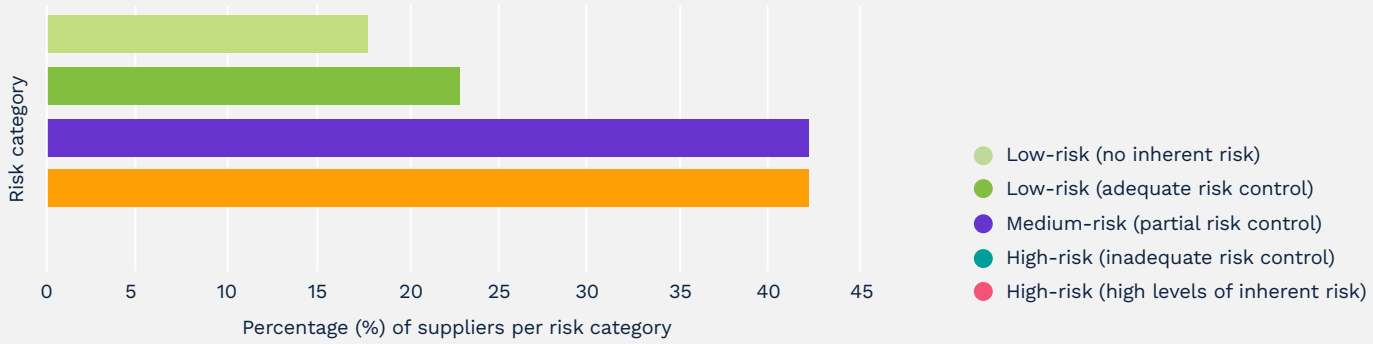
However, several suppliers have been identified as potentially high risk due to inadequate controls in place. The distribution of supplier risk categories is illustrated in Figure 4.4.1 below. Programmed is actively engaging with all its suppliers to ensure they implement the required improvements and to track their progress over time.

During the Reporting Period, 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 of Conduct and Procurement Policy sets clear expectations for vendor partners regarding compliance, human rights, health and safety, fair payment and environmental responsibility.

Although no modern slavery reports or violations were observed or received by Programmed during the Reporting Period, Programmed acknowledges the need for continuous improvement.

Programmed has also committed to introducing a modern slavery audit program within its internal audit framework, to audit its operations and key suppliers throughout the next Reporting Period. Further detail on this program is provided in Section 5.

Figure 4.4.1 Supplier risk category



4.4 The risk of Modern Slavery within our Supply Chain continued

Programmed continues to use the Walk Free Global Slavery Index to evaluate its 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 4.4.2 below.

The vulnerability model assesses each country using 23 indicators aligned to recognised theories of modern slavery risk and retained through further analysis. The indicators help Programmed identify and understand the structural drivers of modern slavery and inform Programmed's approach to supplier assessment and risk prioritization.

Country	% Spend	Vendor Count	% of Vendors	Vulnerability Index
Australia	98.51%	5974	99.32%	7
United States	0.07%	17	0.28%	25
New Zealand	0.04%	3	0.05%	8
Singapore	0.59%	4	0.07%	24
Great Britain	0.03%	3	0.05%	14
India	0.02%	2	0.03%	56
Belgium	0.00%	1	0.02%	11
Malaysia	0.67%	4	0.07%	37
Malta	0.00%	1	0.01%	Not Available
Canada	0.00%	2	0.03%	11
Hong Kong	0.00%	1	0.02%	28
Ireland	0.00%	1	0.02%	9
Japan	0.07%	1	0.02%	11
France	0.00%	1	0.01%	13

Table 4.4.2 Programmed supply chain map to Walk Free Global Slavery Index.

Figure 4.4.3 below highlights the high-risk sectors in which our suppliers operate, source goods and/or services, or produce goods and/or services

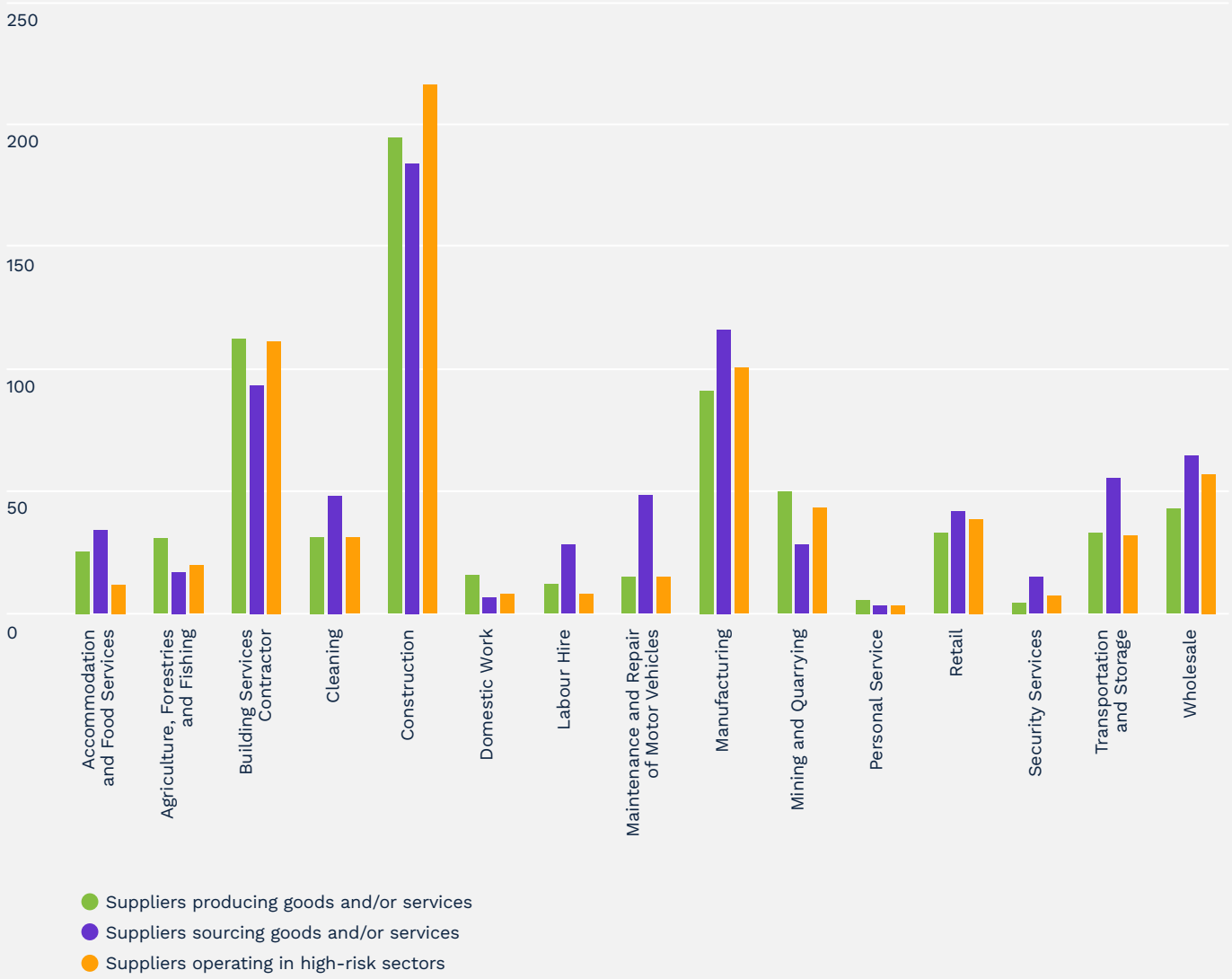


Table 4.4.4 below highlights the key modern slavery risks that may exist through the Programmed supply chain

Programmed	Potential modern slavery risks through our procurement / supply chain	How might these risks be manifested through our procurement / supply chain
Facility Management Services	• Servitude • Debt bondage • Child labour • Deceptive recruitment practices • Forced labour	• Soft services (cleaning and catering service providers) • Security Services • Traffic Management services • Procurement of uniform & personal protective equipment from high-risk geographies • Purchasing of food and related goods in regions of known agricultural exploitation risks • Purchasing of office supplies • Purchase of industrial materials, equipment, and tooling • Engagement of improper / unlicensed external labour hire or visa agencies • Grounds equipment supply • Procurement of painting consumables, tools, and paints • Supply of electrical componentry • Purchasing of office supplies • Graffiti removal service providers • Outsourced painting services • Sanctioned individuals and / or companies • Civil infrastructure and construction refurbishment service providers • Low-cost manufacturing of consumables and equipment from vulnerable supply markets
Property Services		
Staffing		• Engagement of unlicensed external labour hire agencies • Engagement of a third-party labour supplier under a Managed Services Provider (MSP) solution • Procurement of Uniform & PPE • Procurement of promotional items • Purchasing of office supplies • Purchase of industrial materials, equipment and tooling

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.

Figure 5.1 illustrates the PERSOL Group's risk management structure which is built on the three lines of defence model:

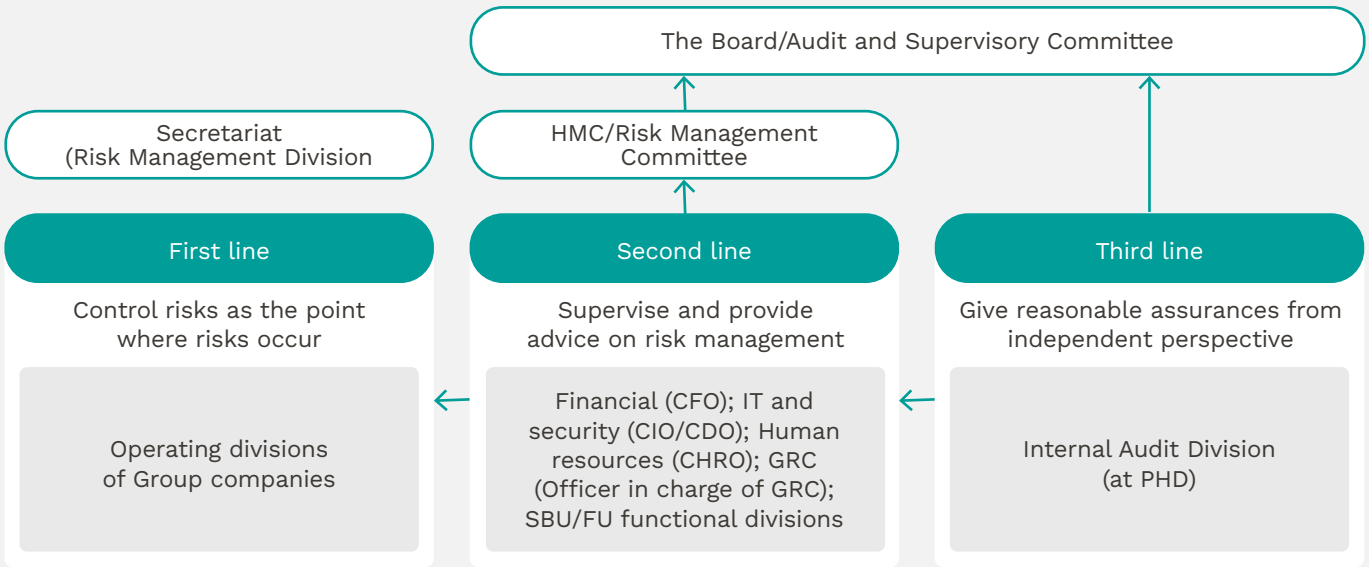
- **First Line** (Group companies/SBU): Executes risk management activities at the point where risks occur in business activities and daily activities.
- **Second Line** (Functional Division): Monitors and supports the risk management activities of each PERSOL Group company
- **Third Line** (Internal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

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 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



5.2.1 Third Party Review

In the previous Reporting Year, 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.

5.2.2 Internal Audit

A key component of Programmed's continuous improvement activities is the planned introduction of a modern slavery audit program in the next Reporting Period.

At the time of this Statement, work had commenced on developing an internal Modern Slavery Risk Auditing Framework and assessment tool, aligned to the International Labour Organisation Core Conventions and Standards, the Ethical Trading Initiative Base Code, and other recognised global ethical standards. Key suppliers had also been identified on a risk basis, and the audit program is targeted to commence in early 2026. The auditing tool will be tested during the next Reporting Period, with full implementation planned thereafter.

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

Improvement Opportunity	Actions Taken in the Reporting Year
Considering modern slavery and human rights within our Workplace Risk Assessment templates for prospective clients.	**Complete** – 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.	**Complete** – Specific clauses relating to clients complying with the Modern Slavery Act, informing Programmed have been implemented in the context of the services being rendered.
Refine Programmed's grievance and response policies on support mechanisms available for victims of modern slavery practices.	**Complete** – Modern Slavery grievance and response guide was prepared and 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 the current Reporting Period, 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 the next Reporting Period, 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 does not tolerate child labour or the exploitation of children and complies with the International Labour Organisation Conventions and Standards 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 is 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 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 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 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 is in place that provides 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.

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 on Programmed's internal applications which are configured to maximise confidentiality.

Programmed utilises 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:

- Disciplinary Policy;
- Diversity, Equity, Inclusion and Belonging (DEIB) Policy;
- Domestic and Family Violence Resource;
- Equal Opportunity Policy;
- Health Safety and Wellbeing Policy;
- Injury Management Policy;
- Privacy Policy;
- Procurement Policy;
- Quality Policy;
- Respectful Workplaces Policy and
- Sustainability Policy.
-

5.3 Assessing the effectiveness of our activities

Programmed has 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 financial year commitments is summarised below

Current Reporting Period Commitments	Outcomes	Summary of Action Taken
Perform 2 yearly review of Programmed's Subcontractor Handbook	Ongoing	A review of Programmed Subcontractor Handbook was undertaken in the current Reporting Period, in line with the UN Guiding Principles on Business and Human Rights and Global Slavery Index and Commonwealth guidance material. The Handbook is scheduled for re-publishing in the next Reporting Period (FY2025-26) and will be rolled out to all contractors as part of the upgrade to the vendor procurement system. The Handbook will include strengthened guidance on understanding modern slavery risks.
Roll out new iPRO software and leverage the platform to evaluate and track supplier risk	Ongoing	Programmed transitioned from Informed 365 to iPRO software, which specialises in the assessment and management of modern slavery, ESG, corporate social responsibility and compliance risks. This has been a major change during this Reporting Period for suppliers, with the introduction of a new evaluation and reporting tool that covers inherent risks and risk controls to provide key insights into our suppliers. Key insights have been discussed in Section 4. Approximately 30% of Programmed's suppliers were targeted during the Reporting Period on the basis of potential modern slavery risk. By the end of the Reporting Period, more than 60% of these suppliers had responded and been evaluated, with clear improvement actions identified. The next annual iPRO assessment cycle is scheduled for November, targeting 1634 vendors, including 580 vendors from the previous year with whom Programmed continues to work on improvement actions.

5.3 Assessing the effectiveness of our activities continued

Current Reporting Period Commitments	Outcomes	Summary of Action Taken
Review Programmed's vendor prequalification platform and refresh Programmed's vendor inductions.	Ongoing	Programmed reviewed its vendor prequalification platform and criteria in line with current Commonwealth guidance and UN Guiding Principles in the previous Reporting Year. The technology stack that supports its vendor prequalification and onboarding process was also reviewed deemed relevant at the time with the exception the transition to i-Pro (noted above). Modern slavery and human rights content within Programmed's vendor induction materials was refreshed in the previous Reporting Year. Further improvements will also be introduced as part of the broader technology stack refresh, including improved training and information resources for suppliers.
Update Programmed Contractor Essentials website	Ongoing	Programmed reviewed the guidance and informational resources available to vendors in relation to modern slavery and human rights. Updates to the Programmed Contractor Essentials website are scheduled to be undertaken in the next Reporting Period (FY2025-26).
Include Modern Slavery audits into Programmed internal audit program	Ongoing	Programmed's assurance framework for modern slavery and human rights was reviewed during the Reporting Period. Assurance activities have been identified and developed across all three lines-of-defence and implementation is underway. Although Programmed had previously committed to commencing internal audits during the Reporting Period, the focus this year was on collecting supplier assessment data to identify and prioritise high-risk suppliers. Development of the modern slavery audit tool will be a key focus of the next Reporting Period (FY2025-26), with quarterly internal audits targeted to commence thereafter.

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 FY25	Description of Action
Supplier Code of Conduct	**FY24 (Ongoing)** – Review supplier and vendor engagement processes and procedures in the context of PERSOL Holdings Procurement Policy and Supplier Code of Conduct. Develop and roll out a supplier Code of Conduct.
Training and education	**FY25 (Ongoing)** – Continue to enhance the team's awareness and knowledge of modern slavery risk through ongoing training and capability-building activities.
Supplier Modern Slavery Assessment	**Ongoing** – Continue to enhance the team's awareness and knowledge of modern slavery risk through ongoing training and capability-building activities.
Policies and Procedures	**FY24 (Ongoing)** – Review and update key policies to ensure they capture ethical procurement requirements and incorporate strengthened modern slavery expectations. Key documents to developed / updated are: • Procurement Policy • Procurement Procedure and risk decision trees • Social, ethical sustainable resourcing Policy. • Supplier Code of Conduct • Several Fact sheets on sustainable procurement. **FY25 (Ongoing)** – Continue to review and refine key policies to ensure alignment with best ethical practice and recognized global standards.

5.4 Our Future Focus continued

Committed actions in FY25	Description of Action
Vendor Onboarding	**FY25** – Roll out the new vendor onboarding system, Rapid Global. Require vendors to onboard through the system, complete the contractor/worker induction and review the updated contractor handbook, which includes modern slavery requirements. **FY25** – Continue strengthening the vendor onboarding process by providing additional guidance, training and information on modern slavery risks.
Audit Program	**FY24** – Develop a modern slavery audit tool aligned to recognised global ethical standards. Identify key high-risk suppliers and test the audit tool. **FY25** – Further roll out internal modern slavery audit program, including establishing performance indicators to target nominated suppliers annually. Embed the audit program into standard operating practices.

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 1st December 2025, 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
- HVA Technical Services Pty Limited
- Integrated Maintenance Services Pty Ltd
- Persol Services Australia Pty Ltd (formerly Kelly Services Australia Pty Ltd)
- Peopleco. Pty Ltd
- Persol Staffing Australia Pty Ltd (fka Persolkelly Australia Pty Ltd; 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

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