

A silhouette of a person standing on a cliff with their arms raised, set against a teal background. The person is positioned centrally, with their arms spread wide. The cliff they stand on is dark and extends across the bottom of the frame.

2021 Modern Slavery Statement

Acquire BPO Pty Ltd

This statement is made under the *Modern Slavery Act 2018 (Cth)* and is made for the financial year ending June 2021.

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1. Our commitment against modern slavery

Acquire BPO is committed to acting ethically and with integrity in all its business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery does not take place anywhere in our business or in any of our supply chains.

We are also committed to ensuring there is transparency in our business and in our approach to tackling modern slavery, consistent with our disclosure obligations under Australian modern slavery legislation. We expect the same high standards from our contractors, suppliers, and business partners. As part of our contracting process, we may include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude, or debt bondage, whether adults or children. We expect that our suppliers hold their partnerships to the same standards.

This Modern Slavery Statement is made by Acquire BPO Pty Ltd and its subsidiaries for the financial year that ended in June 2021.

2. Our corporate structure

Acquire BPO Pty Ltd (**Acquire PBO**) is a company limited by shares and incorporated and domiciled in Australia. Acquire BPO is directly owned by Ostia Holdings Pty Ltd. and Stav Holdings Pty Ltd, respectively. Its registered address is Level 15, 10 Queens Road Melbourne, VIC 3004. Acquire BPO has existing subsidiaries in Australia, the Philippines, the United States of America, and the Dominican Republic.

3. Operations

Acquire BPO was established in 2005 as a captive environment by two entrepreneurs in response to the lack of offshoring providers with a high-quality solution. Acquire BPO has since evolved into a full-scale outsourced contact centre and BPO enjoying exponential growth year on year. Today, our company employs 9,500+ experienced professionals and operates from 15 state-of-the-art locations in Australia, the Philippines, the United States, and the Dominican Republic. We serve a wide range of industries including telecommunications, banking & financial services, insurance, media, education, and retail. These services include customer service, sales, technical support, retention campaigns, back-office functions, software development and marketing services for private and publicly-listed companies around the world—helping them to optimise costs, develop operational performance, increase productivity and efficiency, and obtain flexibility in staffing and workforce.

Our business is organised accordingly:

Australia

- An Australian entity (Acquire BPO Pty Ltd) is responsible for the overall governance of the entities in the Philippines, the US, and the Dominican Republic.
- Acquire BPO Australia Pty Ltd is responsible for the Australia operations, which also includes subsidiaries Acquire BPO Vic Pty Ltd, Savings Made Easy Pty Ltd, Smart Field Services Pty Ltd, and Green Made Easy Pty Ltd.

Philippines

- Philippine-based entities (SHORE Solutions Inc., Acquire Asia Pacific Philippines, Inc., Acquire Asia Pacific Manila, Inc, Acquire Asia Pacific Manila 2, Inc., Acquire Asia Pacific, Inc.), are responsible for the offshore business process outsourcing services for the English-speaking market.

US and Dominican Republic

- US entity (Acquire BPO Inc.) and the Dominican Republic (Acquire BPO SRL) are responsible for the offshore business process outsourcing service for the US and Spanish-speaking market.

We have acted in consultation with the entities listed above in preparing this statement by sharing details of key suppliers/vendors and the associated spend.

4. Our supply chains

Our supply chains involved with our procurement of products and services are global and extensive across industry sectors. We partner with multiple first-tier and second-tier suppliers from different countries. Given our size and geographic reach, ensuring we avoid any involvement in modern slavery (in particular, beyond first-tier suppliers), is a considerable challenge.

We have a Supplier Code of Conduct in place for all our suppliers and persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners. This underscores our commitment to acting ethically and with integrity and enforcing systems and controls that minimise the risk of modern slavery from occurring in our business or our supply chains.

5. Risk of modern slavery

Slavery is a crime and a violation of fundamental human rights. It takes various forms, whether against adults or children, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. These may include:

- Servitude
- Forced and compulsory labour
- Forced marriage
- Debt bondage
- Human trafficking

At Acquire BPO, the risk of modern slavery is low as our recruitment, labour relations, procurement and compliance processes are stringent and aligned with the local laws and regulations where we operate. We exert effort to ensure that no human rights are not violated in any form.

6. Preventing modern slavery in our business

We are committed to providing an environment where employees have equal access to opportunities available at work, are treated with fairness and respect and are not judged by unlawful or irrelevant reference to their attributes. We adhere to the following and, similarly, expect our suppliers to:

- Demonstrate respect for and not discriminate any person or entity differences such as gender, race, colour, age, disability, sexual orientation, ethnic origin and religion.
- Actively seek gender equality (including equal participation of women and men) in their workplace or comply with Workplace Gender Equality Agency reporting requirements as applicable.

We're committed to the principles of Equal Employment Opportunity (EEO) in the workplace and promoting a positive work environment that values equal opportunity free of unlawful discrimination, bullying or harassment. We adhere to the following and expect our suppliers to:

- Abide by a Diversity and Inclusion Code of Conduct, EEO or similar policy.
- Provide an environment where people are treated lawfully, equally and with dignity and respect.
- Promote a culture in which there is zero-tolerance for unlawful discrimination and harassment.
- Provide fair pay and working conditions for employees including adequate rest periods, leave and minimum wage requirements.
- Make provision for parental and carer's leave as required by law.

7. Addressing the impact of COVID-19 in Acquire BPO's Modern Slavery Statement

The Company maintains a rigorous program to ensure that the risk of Modern Slavery in the supply chain is carefully monitored and mitigated including the impact of the COVID-19 pandemic.

During the pandemic, Acquire BPO maintained the same operational structure and even expanded its operations to meet the global demands of our customers. In effect, we have expanded our supply chain and increased our usual procurement of electronic devices and transportation services to meet the growing demand from our customers.

Acquire BPO is a Business Process Outsourcing company, and relies heavily on PEOPLE in its day-to-day operations. Employees from all entities and regions of Acquire BPO were immediately affected due to local government restrictions. It immediately affected the mobility of all individuals including the ability of our employees to report to work. Acquire BPO complied with the local regulations and prioritised the safety and wellness of our employees during the pandemic.

Acquire BPO implemented the following measures during the COVID-19 pandemic:

- Acquire BPO immediately complied with the health and safety protocols issued by the local government where we operate.
- Employee travel was restricted so Work from Home (WFH) arrangements were implemented in most of our operations to promote the health and safety of our employees by preventing them from being compromised.
- Employees who needed to Work from Office (WFO) were given temporary accommodation options near our offices to reduce the risk of infection while travelling to work.
- Private transportation services were provided to some employees living near our offices to help them travel safely to work.
- Increased sanitation and strict health and safety protocols, such as mandatory wearing of face masks and daily health checks, were implemented in our facilities to prevent spread of the virus.
- Health, safety and mental health awareness programs were launched to help our employees cope with the effects of the COVID-19 pandemic.

Acquire BPO also implemented the following controls to measure the effectiveness of the protocols used to minimise the effect of the COVID-19 pandemic on its supply chain:

- Acquire BPO implemented a COVID-19 response hotline to monitor and help the employees with confirmed and suspected cases of COVID-19.
- Monitoring procedures were established to maintain compliance of both WFH and WFO employees to ensure we maintained our standard of support for client operations without compromising the health and safety of our employees.

8. Our policy on modern slavery

We're committed to minimising the risks and occurrence of modern slavery in our supply chains or any part of our business.

Our Acquire Modern Slavery Policy reflects our commitment to acting ethically and with integrity internally and in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in our supply chains. It requires all employees and suppliers to notify us in the event of any discovery of modern slavery.

Our Whistle-Blower Policy reflects our commitment to discovering instances of modern slavery or other issues within our business and supply chains. It ensures whistle-blowers are given protections aimed to encourage whistle-blowers to come forward.

Violations of the Acquire Modern Slavery Policy have severe consequences, and may result in actions being taken against:

- Employees, including disciplinary action, which may result in dismissal for misconduct or gross misconduct.
- Contractors or organisations we work with, including, but not limited to, termination of our business relationship with that entity.

9. Due diligence on modern slavery

Based on our developed risk profiling, our commitment to addressing the issue of modern slavery in our business and supply chains is communicated to suppliers, contractors and business partners at the onset of our partnership and is reinforced, as appropriate, thereafter.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle-blowers.

We're committed to conducting business in an open and accountable way and we expect our suppliers to:

- Act in an ethical, fair and professional manner, both internally and externally, including with regards to how the community is affected by their business.
- Not offer gifts to gain improper advantage or preferred treatment in the supplier's business dealings.
- If possible, avoid (but always declare) any conflicts of interest that may impact commercial arrangements between the supplier and us.

We're committed to promoting a culture of health and safety awareness that ensures risks in the workplace are eliminated or controlled and we expect our suppliers to:

- Comply with all health and safety laws and regulations.
- Take proactive measures to prevent workplace risks (including providing appropriate training to enable workers to perform their jobs safely).

10. Modern slavery training

Training is important in enforcing the Modern Slavery Practises of Acquire BPO. An online learning module is in place to promote modern slavery awareness in the organisation. This includes training on how to identify modern slavery practices and the parts of our business and supply chains that may be subject to a greater risk of modern slavery practices. This training will also form part of the induction process for all individuals who work for us, whether as an employee or a contractor.

11. Our effectiveness in combating slavery

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery is not taking place in any part of our business or supply chains:

- Vendor accreditation is present where the supplier is assessed if compliant with Acquire BPO's Modern Slavery and Responsible Procurement Policy.
- No issues are identified with modern slavery compliance in the screening of suppliers, except for the delay of submission of accreditation requirements.
- No modern slavery concerns are reported through our Whistle-blower channels.

- Our total employee population of Acquire globally has access to modern slavery training.

We manage these risks to our organisation by maintaining consistent and high standards of due diligence and risk mitigation processes to monitor for and avoid modern slavery in all environments in which we operate, regardless of whether the environment or the suppliers with whom we work are more or less vulnerable to modern slavery.

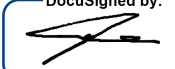
12. Further steps and remediation

Following a review of the effectiveness of the steps, we have taken to ensure that there is no slavery in our supply chains we intend to continue taking remedial steps to combat slavery in our operations and supply chain.

Our Compliance Team is responsible for monitoring and auditing internal controls and procedures to identify risks of modern slavery practices in our operations under Australian modern slavery legislation, including our subsidiary organisations.

This Modern Slavery Statement has been approved by the principal governing bodies Ostia Holdings Pty Ltd. and Stav Holdings Pty Ltd.

Signed by:

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Scott Stavretis

Chief Executive Officer – Acquire BPO Pty Ltd
Level 15, 10 Queens Road, Melbourne, VIC 3004
12 April 2022