



2023 Modern Slavery Statement



For reporting period from 1 July 2022 to 30 June 2023

Actions by Oncore to eradicate modern slavery in its business operations and supply chains



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A. Statement from Oncore



Oncore Group Holdings Pty Ltd ACN 137 343 349 ('Oncore'), is opposed to all forms of modern slavery. Oncore respects and supports the protection of human rights and is committed to human rights in the workplace and with working with clients, suppliers and partners that are aligned to our values and operate in accordance with modern slavery laws.

This commitment includes identifying, addressing, remediating and safeguarding against the risks of modern slavery practices in our business operations and supply chains, sourcing quality products and services from suppliers that share these values and respecting the dignity and worth of all employees. We are committed to the principles outlined in the United Nations Guiding Principles on Business and Human Rights.

This Modern Slavery Act Statement ('MS Statement') is published in accordance with the Commonwealth Modern Slavery Act 2018 (Cth) ('the Act') and details the steps taken by Oncore to prevent modern slavery in its operations and supply chains during the reporting period 1 July 2022 to 30 June 2023.

This is Oncore's 4th MS Statement. Oncore's 1st MS Statement was lodged, with the Australian Border Force for the period ending 30 June 2020. Oncore is committed to lodging the MS Statement each year. We continue to make lodgements in the interests of safeguarding against the risk of modern slavery practices.



B. Seven key reporting areas

1. Identification of the company

Oncore is a large privately owned company registered in Australia. Oncore is providing a joint MS Statement with One Vendor Payroll Pty Ltd ACN 135 287 071 and Oncore Consulting Pty Ltd ACN 137 348 951 which are the subsidiaries of Oncore ('Reporting Entities'). Details of Oncore and the subsidiaries it controls are set out in Annexure 'A'.

2. Oncore's Structure, Operations and Supply Chains

Structure and operations

Oncore is a global company specialising in payment solutions for professional contractors, recruiters and corporates - all backed by leading technology and infrastructure. Our operations include all aspects of flexible workforce management, payroll and administration, from salary packaging and contractor care to risk mitigation of contingent workforce or complete outsourcing of the back office for Recruiters. Oncore has over 20 years of experience in this specialist market, engaging with thousands of contractors across Australia, New Zealand and the UK. Oncore is comprised of several companies controlled by a Board of Directors. We have various offices throughout Australia, The United Kingdom and Columbia.

Our total direct workforce for this reporting period was 67 in Australia, 4 in The United Kingdom and 6 in Columbia. Oncore also used 6 internal contractors during this time. During the reporting period Oncore has on hired 493 individual contractors and 1043 corporate contractors.

Supply chains

Oncore has identified that its main supply chains are in Australia. During the reporting period Oncore has engaged directly with just over 100 different suppliers which includes, insurance, office and information technology equipment, professional services and maintenance services. Previously, our largest category of spend was on Insurance however this has now updated to IT Consultancy, in particular, Software Development is now our largest supplier and is Australian based.

Policies and procedures

Oncore's Core Values, Code of Conduct and policies and procedures set the behavioural standards for Oncore and reflects our commitment to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our operations or supply chains.

Oncore's Four Core Values describe what we stand for and guide us. They are the following:

TRUST

Always act with integrity & deliver on our promises

SIMPLICITY

Find new & smarter ways to make things easy and simple

OWNERSHIP

Empower each other to drive performance & growth

PEOPLE

Share our skills, knowledge & experiences and become one team

Through a strong culture of safety and transparency, we continue to drive better processes and procedures as a team to ensure we are truly enabling the wider workforce to enjoy freedom whilst remaining compliant.





Oncore's Code of Conduct, which links to our values, addresses the professional, ethical, financial and social values of Oncore and represents the commitment of Oncore and its employees to our customers, contractors and the communities in which we work and live.

Oncore has policies and procedures that confirms our commitment to human rights in the workplace including:

- POL-HR-11 Modern Slavery Policy
- POL-HR-06 Code of Conduct
- POL-HR-13 Workplace Health and Safety Policy
- POL-HR-04 Anti-Bribery, Corruption, Fraud and Conflict of Interest Policy
- POL-IT-11 Supplier Security Policy
- POL-HR-12 Whistleblower Policy
- Human Rights Policy
- Diversity and Inclusion Policy
- Grievance Resolution Policy
- Workplace Behaviour Policy
- Corporate Responsibility Charter

3. Risks of Modern Slavery in Operations and Supply Chains

Oncore has reviewed its modern slavery practices risks across our operations and supply chains using a targeted and risk-based approach in line with the United Nations Guiding Principles on Business and Human Rights. Oncore has considered the following: sector and industry risks, product and services risks, geographic risks and entity risks and we have been able to identify areas of no or low risk, for example operational activities that are directly undertaken by Oncore employees.

We have identified potential risk, for example where a local third-party supplier may source a technology product from overseas sources. We will use these potential risk scenarios to prioritise our supplier engagement activities in the future. We are also working on refining the traceability of goods and services within our supply chain and have implemented the Oncore Corporate Responsibility Charter. This Charter outlines the business practices and professional standards Oncore expects from its business partners which includes suppliers.

The general risk areas for modern slavery in Oncore's business operations and supply chains include:

a. Operations

- **Sector and Industry Risks** - Oncore recognises that the following sectors or industries have a higher risk of modern slavery: cleaning services, domestic work, construction, manufacturing, mining, textiles, agriculture and fishing. Oncore does not operate in any of these sectors. Oncore operates in certain sectors and industries that may have modern slavery risks because of their characteristics and processes, such as the use of short-term contracts and outsourcing, the use of foreign workers or potential recruitment strategies by suppliers, their agents, or labour hire agencies.
- **Product and Services Risks** - Oncore uses the following products or services in its operations that have a higher risk of being linked to modern slavery: garments and electronics.
- **Geographic Risks** - Oncore operates in countries that may have higher risks of modern slavery due to, among other things, poor governance, weak rule of law, conflict, migration flows, and socio-economic risk factors, such as lack of educational and training opportunities and poverty. However, Oncore does not have any operations located in and does not source workers from any of the regions with the highest risk of modern slavery as per the 2022 Global Estimates of Modern Slavery Index. These higher risk regions include the following Africa, Americas, Arab States, Asia and the Pacific, Europe and Central Asia. More specifically, the countries in the top 10 for MS risks include North Korea, Mauritania, Eritrea, Burundi, Central African Republic, Afghanistan, South Sudan, Pakistan, Cambodia and Iran.

b. Supply Chains

Sector and Industry Risks - Oncore has suppliers in the following sectors or industries which have a higher risk of modern slavery: cleaning services, construction services and textiles services.

Product and Services Risks - Oncore obtains the following products or services from suppliers that have a higher risk of being linked to modern slavery: garments and electronics. Oncore may obtain certain products and services from suppliers that may have high modern slavery risks because of the way such products or services are produced, provided, or used, such as:

- delivery timeframes might require suppliers to engage in excessive working hours, make cost savings on labour-hire or rapidly increase workforce size;
- the product is made in countries where there is a high risk of labour exploitation reported by international organisations.

Geographic Risks – A large number of our suppliers are based in Australia. Oncore has suppliers in one or more countries that may have higher risks of modern slavery. However, Oncore does not have any suppliers located in any of the top ten countries with the highest risk of modern slavery as per the 2018 Global Slavery Index and does not source workers from any of the regions with the highest risk of modern slavery as per the 2022 Global Estimates of Modern Slavery Index.



4. Actions Taken to Assess and Address Modern Slavery Risks

Oncore has various systems, processes and procedures and has taken the following action and due diligence to identify, prevent, mitigate and account for how we address modern slavery risks in our operations and supply chains including:

Modern Slavery Act – We have now published three MS Statements with the Australian Border Force. Our Oncore MS Statement can be found on our website at: <https://www.oncoreservices.com/au/policies/>

Governance – We reviewed our governance, risk and compliance frameworks and allocated responsibility for assessing and addressing modern slavery risks to the Legal Team.

Brought Together Key Areas - Key departments were convened, including Legal, Human Resources, Finance, Risk, Senior Management and the Board to assist with the assessment of key risks. The Board and other Senior Management were briefed on the progress of action taken.

Action Plan – We reviewed the Oncore Modern Slavery Risk Management System and the Oncore Modern Slavery Act Five Year Plan which has since evolved and is continually updated. This system sets out how Oncore will improve its response to modern slavery risks including measurable outcomes. It includes details of our policies and procedures, supplier process, supply chain audit (onboarding, audit, review and engagement), education and training and response procedures.



Continued

Modern Slavery Act Policy – We created and published the Oncore Modern Slavery Policy which outlines our approach to reducing the risk of modern slavery practices and applies to all workers and everyone we do business with. This policy can be found on our website.

Corporate Responsibility Charter – Implemented this Charter that outlines the business practices and professional standards Oncore expects from its business partners including its suppliers.

Contracts – Included a special condition in all Recruiter Contracts in relation to the Modern Slavery Act and the Corporate Responsibility Charter.

Policies and Procedures – We reviewed and updated existing policies, procedures and systems to help ensure not only a fair workplace, but also the minimisation of modern slavery risks in our business operations and supply chains and ensured that some of those policies are available on our website.

Modern Slavery Due diligence – We continued our review and mapping of our operations and supply chains to assess modern slavery risks and to improve our understanding about what is happening in our supply chains.

Human Rights Due Diligence - We performed due diligence to identify and assess human rights impacts. We continued our care for our workers (staff and contractors) including:

- Providing meaningful consultation - We have continued direct and frequent contact with workers including phone check in calls to provide workers with support, sector-specific welfare checks to remote workers and regular surveys to capture feedback and address issues.
- Providing programs including the Oncore Employee Assistance Program which includes private free counselling sessions.
- Ensuring all workers have copies of agreements that detail the terms and conditions of their assignments including rates of pay, hours worked, entitlements and safety.
- Performing audits and training of applicable staff to ensure all workers have verified photo identification, right to work checks, are over the age of 18 years and are paid a minimum wage in line with the Australian National Employment Standards and Modern Awards.

Continued

Education and Training – We implemented and provided training in relation to the Modern Slavery Act and Modern Slavery risks to all Oncore Staff by:

- Presenting an overview with Senior Management;
- Presenting a summary to all staff in an Oncore business meeting;
- Providing a detailed e-learning training course to all staff of which 100% of staff have completed;
- Specialised high level training of the Legal function.

Grievance Mechanisms – We reviewed our grievance mechanisms (including our Whistleblower Policy) to ensure that they are accessible, predictable, equitable and transparent to allow the safe reporting of modern slavery risks. We ensured that these mechanisms are confidential and protect worker's privacy. This Policy can be found on our website.

Labour Hire Licences – We held and continue to hold a labour hire licence in both Queensland and Victoria (all states where we are required to be licenced). Such licences are to protect workers from exploitation and to improve transparency and integrity in the labour hire industry.

Membership – Continued Corporate membership with SIA (Staffing Industry Analysis) and reviewed the resources they have available to keep Oncore up to date.



5. Assessment of Effectiveness of Actions Taken by Oncore

Oncore is committed to continual improvement, transparent reporting and to assessing the effectiveness of our ongoing actions to assess and address modern slavery risks. This includes the following:

- Consulting with Reporting Entities about the effectiveness of action taken.
- Establishing a process to regularly review, monitor, manage our actions and report progress on a range of indicators used to assess the effectiveness of our programs and performance in line with our Oncore Modern Slavery Act Five Year Plan. This Plan is continually updated and reviewed.
- Conducting audits and surveys and reviewing, comparing, tracking, documenting and comparing the results.
- Reviewing and updating policies regularly and implementing risk assessment processes to ensure they remain up to date.
- Setting up a process to provide for regular engagement and feedback between key departments.
- Tracking modern slavery training, including keeping records of the number of staff who have completed training and when training is updated and repeated.
- Tracking suppliers and the number of suppliers who have been screened.

6. Entity Consultation

Oncore recognises that all the Reporting Entities within Oncore have a role to play in addressing modern slavery risks.

We have consulted and continue to consult with each of the Reporting Entities and key departments within Oncore to prepare this MS Statement and to help assess and respond to key risks.

The company secretary for each Reporting Entity is aware that this MS Statement is being prepared, has viewed the MS Statement and has had the opportunity to participate in the process.



7. Initiatives

In 2019 - 2020 - we introduced:

- Created and Implemented the Modern Slavery Policy
- Assessed modern slavery risks in our operations and supply chains
- Developed the Modern Slavery Act 5 year plan
- Reviewed systems to consider Modern Slavery Risks

In 2021 we introduced:

- March 2021 Published our First Modern Slavery Statement
- Created the Modern Slavery Risk Management System
- Updated the Human Rights Policy
- Updated all Policies on our Website
- Dec 2021 Published our 2nd Modern Slavery Statement

In 2022 we:

- Implemented the Corporate Responsibility Charter
- Implemented Staff Training for all Oncore staff
- Updated our Modern Slavery Policy,
- Completed a review of Whistleblower Policy and Human Rights Policy
- Updated the Modern Slavery Act 5 year plan

In 2023 we:

- Conducted a full policy refresh leveraging on external provider's knowledge
- Reviewed and updated various policies and procedures
- Reviewed our Human Right Policy as part of our two year review plan
- Commenced the process of ISO2700 certification in late 2023
- Continue to refresh our Modern Slavery Supplier vetting process

Future Action and Goals

Oncore is committed to continuous improvement on how we identify, address, remediate and safeguard against the risks of modern slavery practices in our operations and supply chains. We continue to refine our response, processes and procedures in relation to modern slavery in accordance with our 5 year plan and over the next year we will focus on:

- Continue to review and update our policies and procedures
- Commit to reviewing our Human Right Policy every two years (next review due 2025)
- Enhance due diligence for existing and new suppliers
- Educate our suppliers about our Corporate Responsibility Charter and standards
- Reviewing our contractual terms with suppliers and on all contracts
- Reviewing our ongoing assessment of our supply chain
- Reviewing and improving staff awareness and education
- Continued learning and consultation with industry bodies, business partners and suppliers



C. Board Approval and Signature

Principal Governing Body Approval

This Modern Slavery Statement for Oncore, the parent entity, was approved by the principal governing body of Oncore, being the Board of Directors of Oncore, as defined by the Modern Slavery Act 2018 (Cth) on 21/12/2023.

Signature of Responsible Member

This Modern Slavery Statement is signed by a responsible member of Oncore who is a Director.

Grant Alexander Gee
Director
Oncore Group Holdings Pty Ltd



Date: 21st December 2023