

Rubix Solutions Pty Ltd – Modern Slavery Policy

INTRODUCTION

Rubix Solutions Pty Ltd (“the Company”) has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. Modern slavery is a crime and a violation of fundamental human rights. The Company recognises this takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Company is committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2018 (Cth). The Company fully supports the Modern Slavery Act 2018 (Cth). The Company expects the same standards and commitment from all of its suppliers, contractors and other third parties. The Company recognises that companies have a responsibility to respect human rights within their own operations and business relationships and to take steps to identify and eliminate modern slavery in their business operations and supply chain.

OUR STRUCTURE

Rubix Solutions Pty Ltd is private limited company. Founded in January 2014, Rubix Solutions is a specialist recruitment company operations within the Information Technology, Telecommunications and Defence sectors. The company continues to help businesses across Australia find the skills they need, while assisting untold numbers of job seekers in finding meaningful employment in Technology and Government positions on a temporary, contract and permanent basis. For the purposes of this Modern Slavery Statement the reporting entity is Rubix Solutions Pty Ltd (ABN 99 167 081 772).

The Company does not own or control any other entities.

OUR BUSINESS OPERATIONS

Operating through a network of branch offices in Australia, the Company operations provide specialised recruitment services through multiple divisions:

- **Rubix Solutions - Telecommunications**, which specialises in experienced temporary and permanent Telco professionals.
- **Rubix Solutions – Information Technology** which places technical and functional IT professionals.
- **Rubix Solutions - Defence & Government** which places security cleared technical and functional IT professionals within Defence and Government.

- **Rubix Solutions - Executive Search** which specialises in the search for and placement of executive leadership talent across a broad spectrum of functional areas and industry sectors.

The Company's specialised recruitment services include permanent recruitment services and short-term labour hire services via the placement of temporary personnel to perform work for our clients and customers. The Company's operations are located in Australia where the Company provides specialised recruitment services within Australia.

Outside of the core recruitment service that we offer we also provide industry specific thought leadership content supported by extensive industry research. Examples of this content includes:

- comprehensive salary guides and employment reports;
- global workplace surveys;
- business leadership forums and executive roundtable events;
- professional hiring indices; and
- white papers.

OUR CORE VALUES AND 'ETHICS FIRST'

One of our key mission statements is to adhere to a philosophy of "Ethics First" in everything we do. This steadfast commitment to '*Ethics First*' provides the behavioural framework for our relationships with fellow employees, candidates, clients, shareholders and vendors. Honesty, integrity and professionalism are the core principles of our business. We expect our people to adhere to these standards in their daily actions and in line with our core values we are committed to improving our processes to help combat modern slavery and human trafficking.

OUR SUPPLY CHAINS

Given the industry in which we operate we do not have an extensive supply chain network. Our supply chain consists of clients that we provide specialised recruitment services to and/or thought leadership content. The Company provides services within Australia. In addition, our supply chains include, amongst others: office supplies including stationery; IT hardware and software; cleaning and catering services; advertising and print services; office fit out and building maintenance services; and professional services such as those provided by the Company's external financial auditors or legal advisors.

RISKS OF MODERN SLAVERY AND HUMAN TRAFFICKING

The Company has assessed the risk of modern slavery and human trafficking within its own operations and supply chains to be relatively low. The Company provides specialised recruitment services within Australia. Our supply chain includes sourcing candidates for our clients and customers. Where short term labour hire services are provided the Company employs or engages candidates directly. The Company does not charge candidates fees for the recruitment services provided. Our staff and candidates tend to be comprised of professionally qualified individuals or skilled individuals that are generally employed to work

in office environments within Australia. Accordingly, any geographic risks are low. The Company does not generally supply labour or recruit individuals to work in high-risk sectors such as cleaning, security, meat processing, seafood processing or horticulture.

We have identified suppliers that assist us with activities related to facilities management including cleaning and catering services, office fit out and building maintenance services, hospitality for onsite and offsite catering and events to be areas of elevated risk of potential modern slavery if not managed appropriately. Workers in these areas may be from vulnerable populations including low skilled or migrant labour or workers from low socio-economic or culturally or linguistically diverse backgrounds.

The Company is licenced as required under the various State and Territory labour hire licensing schemes and complies with all State and Territory labour hire licensing schemes but recognises the risk of being targeted by human traffickers or organisations that engage in some form of modern slavery. We have a team of professionals assisting the business with procurement activities and sales support, and we have sophisticated recruitment processes and procedures in place including a dedicated payroll team.

We take our responsibility for recruiting and supplying staff extremely seriously. We acknowledge that as a service provider to customers across a range of industries there is a risk of the Company supplying services to customers that do not meet our own ethical standards. However, we expect our suppliers to adhere to clear ethical standards, comply with the principles relating to modern slavery set out in our Corporate Offences Policy and to comply with all laws and regulations applicable to their business. During the Reporting Period, the Company has issued a supplier questionnaire to its suppliers for the purposes of identifying and assessing possible modern slavery risks and to foster collaboration between the Company and its suppliers to address or mitigate any possible modern slavery risks.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Our Corporate Offences Policy sets out the Company's position on modern slavery and reflects our commitment to acting in accordance with our mission statement of "*Ethics First*" and with integrity in all our business relationships. We will review our systems and controls so that these remain effective in ensuring slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We identify and assess the risk of potential slavery and human trafficking risk areas in our supply chains using a number of factors including the supplier's geographical location and the industry in which they operate. As part of our initiative to identify and mitigate the potential risk we assess all existing and new suppliers and have in place a supply chain compliance programme, which consists of:

- Requiring all staff to comply with the applicable provisions relating to modern slavery as set out in our Corporate Offences Policy and to avoid any activity that might lead to, or suggest, a breach of this policy.

- Requiring suppliers to agree to comply with the Modern Slavery Act 2018 (Cth) and that they will adhere to the principles relating to modern slavery as set out in our Corporate Offences Policy before they are approved and included in or allowed to continue to be included in, our supply chain.
- Asking all suppliers to complete a supplier questionnaire for the purposes of identifying and assessing possible modern slavery risks. All new suppliers are required to agree to contractual obligations to avoid slavery and human trafficking and all existing contracts will include these contractual obligations at the next renewal or extension.
- Encouraging all staff and third parties to raise any concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage and to notify a manager, a senior point of contact and or the Legal Department.
- The Company provides training to its recruitment consultants regarding key legal obligations.
- The Company has controls in place to ensure that employees receive their minimum statutory entitlements and are classified and paid in accordance with the relevant underlying industrial instruments.
- The Company's consultants are in direct contact with all our candidates upon placement in temporary and permanent roles.
- The Company is committed to regularly review its standard form contracts and terms of business.
- All managers who are responsible for procurement of goods and / or services must ensure that the Corporate Offences Policy and the Company's zero-tolerance approach to modern slavery is communicated to all third parties during the procurement process and / or at the outset of each business relationship.
- Protect staff from victimisation or retaliation if they raise concerns about slavery and human trafficking, even if raised in error.
- We will take any allegation of potential slavery and human trafficking seriously and we will investigate any allegation diligently.
- Publishing a copy of this Modern Slavery Statement on the Company website.

During the reporting period the Company has been engaging more with suppliers on modern slavery issues. Our focus has been on having appropriate systems and processes in place to identify, assess and remedy any actual or potential human rights risks.

TRAINING

To raise awareness of the potential risks of slavery and human trafficking, we provide guidance and training to support our employees understanding of expected behaviours. All staff have been provided with our Corporate Offences Policy and are made aware of the risks of modern slavery and human trafficking in our supply chains and our business.

OUR EFFECTIVENESS IN COMBATING MODERN SLAVERY AND HUMAN TRAFFICKING

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, clients, candidates, members of the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

During the Reporting Period, no modern slavery breaches were disclosed by suppliers nor were any identified by the Company.

During the Reporting Period, we did not receive any complaints from candidates or staff in relation to matters that could result in risks of modern slavery.

During the Reporting Period, the Company has seen an increase in stakeholder engagement regarding modern slavery. Suppliers have been engaging with the Company regarding modern slavery and human trafficking risks through completion of the questionnaire, the sharing of information, the negotiation of contractual terms within supplier agreements that identify compliance with the Modern Slavery Act 2018 (Cth) and making the elimination of modern slavery and human trafficking a core obligation. These questionnaires will be sent out to future suppliers prior to the Company using their services.

We have continued to grow awareness in our business about modern slavery risks and ways to identify and address risks of modern slavery. We will continue to review the effectiveness of our policies and procedures with respect to modern slavery risks. The Company will also consider the need for additional ways to assess the effectiveness of our actions and to increase the level of engagement of our suppliers with the Commonwealth modern slavery laws. Over subsequent reporting periods, we will continue to review and assess our systems and processes to assess the effectiveness of our actions to continually improve our response to modern slavery and human trafficking risks in our operations and supply chains.

APPROVAL

This statement is made pursuant to section the Modern Slavery Act 2018 (Cth) and constitutes Rubix Solutions Pty Ltd's slavery and human trafficking statement for the financial year ending 15th of February 2024.

The Board of Directors has approved this Statement and authorised any Director of the Company, acting individually, to sign this Statement.

Signed for and on behalf of Rubix Solutions Pty Ltd

Matt Huddle



Date: 24/02/2024

Matt Huddle – Managing Director
Rubix Solutions Pty Ltd