

MODERN SLAVERY POLICY

January 2023



EXECUTIVE SUMMARY

First Focus is a growing business with a full-time employee base of around 300 staff across five countries (Australia, New Zealand, Philippines, Ireland, and South Africa).

We engage with a small number of sub-contractors (<5%) and maintain a small casual staff pool that service select clients.

Our team members are paid in their local currency and above award rates for selected regions.

We employ people under different visa statuses and ensure that every employee has the correct rights to work within their country of operations.

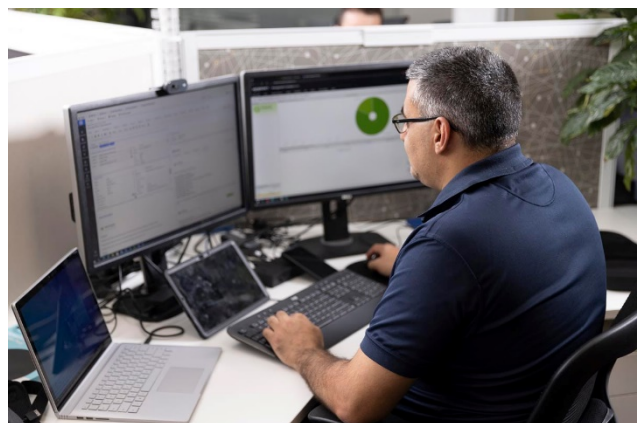
First Focus does not ask any workers across any region to reimburse us for costs deemed unfair, such as costs for recruitment or onboarding. We treat our overseas employees the same as our Australian employees and in line with all government regulations.

First Focus has never had any of the following occur:

- Issues reported by staff regarding deception in our recruitment process.
- Threats reported by staff in the workplace (physically or sexually).
- Concerns reported by staff about wages unfairly withheld.

First Focus also adheres to the following guiding principles:

- We only keep Personally Identifiable Information (PII) documents when required by law.
- We do not provide accommodation to our team members.
- We have never had any breaches to the Modern Slavery Act (2018), Workplace Health and Safety Act (2011), or Employee and Industrial Relations obligations.



ASSESSMENT AND MITIGATION OF MODERN SLAVERY RISK

Steps that we have taken to assess and mitigate risk in our supply chain include:

1

Consideration of modern slavery risk indicators in our risk assessments.

2

Working with suppliers to strengthen their internal policies and procedures if possible.

3

Undertaking supplier audits to validate their workplace practices and align to our values.



Due Diligence Process

First Focus provides IT Goods (Hardware and Software) and IT Support Services/Staff Augmentation.

We only source goods from Original Equipment Manufacturers (OEM), direct from the original vendor, or their designated distribution centres. As we only engage with suppliers who are considered ethical and pass our supplier vetting processes, our risk profile is relatively low, as our suppliers also comply with the Modern Slavery Act.

All staff employed directly by us (or subsequently placed within another organisation) are screened for appropriate rights to work within Australia and are covered by an appropriate award scheme. Visa and Police Checks are performed to ensure the risk profile of all candidates is known beforehand, and we continue to comply with the Modern Slavery Act.

Supplier Vetting and Renewal

As part of our Supply Chain Assurance policies under our Integrated Management System (IMS), all new suppliers are subjected to our Supplier Relationship Policy and our processes for evaluating a supplier prior to any transactions being approved or contracts awarded. We ensure our suppliers comply with appropriate legal, regulatory, and industrial obligations and align with our core company values.

We conduct formal reviews of existing supplier relationships at least once per year. Reviews and ratings of their performance help identify any risks or issues that have occurred. Reviews include action items, reporting, and follow-up items.

Commitment to Compliance, Risk and Governance

First Focus has dedicated people in roles that work in compliance, risk, and governance for the business. These people form a dedicated risk committee that is responsible for identifying and treating risks within the business.

We have a documented and certified framework concerning risk management, treatment, legal, and regulatory compliance.

Remediation Process

First Focus is committed to protecting and respecting human rights across our entire business and our supply chain. Where we identify impacts caused directly by us, or where we may have contributed by other means, we will seek to address the issues as soon as possible in line with our legal requirements.

We maintain a reporting procedure where employees and third parties can report any concerns regarding unethical or illegal conduct, including activities related to modern slavery, directly to management. Where issues are investigated and substantiated, we take appropriate action immediately.

Commitment to Compliance, Risk and Governance

Training and awareness are critical factors in addressing the risk of modern slavery within our workplace. We recognise the need to build the capability of all our employees, particularly our procurement specialists and recruitment teams, to identify potential risks related to modern slavery and the actions required to respond appropriately.

We provide risk and compliance training to all our team members at least every six (6) months, with additional refresher courses made available where required.

Further, all team members working in our supply chain team have received training on modern slavery risks within their department.

