

DRAKE INTERNATIONAL MODERN SLAVERY STATEMENT

This is the first Modern Slavery Statement for Drake International under the Modern Slavery Act 2018 (Cth). It is being produced for the reporting period from 1 October 2019 to 30 September 2020. It is being produced for the reporting entity Drake Australia Pty Ltd (ABN 42 004 939 771).

Drake has a zero-tolerance approach to Modern Slavery.

Drake is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to minimise the risk of modern slavery taking place anywhere in our own business or in any of our supply chains.

BUSINESS STRUCTURE AND OPERATIONS:

Business structure:

Drake Australia Pty Ltd is part of the Drake International corporate group which was established in 1951. Drake International operates in 11 countries throughout the world. It is a privately owned multinational entity which is controlled by Bill Pollock.

Drake Australia Pty Ltd is the principal operating entity for Drake International within Australia. It is a private company with limited liability which was incorporated in Australia in 1972.

Drake Australia Pty Ltd has 7 operational Australian subsidiaries.

Operations:

Core Service offering:

Drake International's core service offering within Australia is the provision of recruitment services and related solutions through its Drake International, Drake Medox and Vertical Talent brands. Under this core service offering Drake will supply recruitment services to clients by locating suitable workers for the client to employ. Alternatively, Drake may itself engage workers as its own employees and then place those employees at client premises as on-hire workers.

Other service offerings:

Drake International also provides consultancy services through its Paradigm, Drake Business Logistics and Drake Safety brands. It also provides student placement services through its Drake Student Recruitment and MeStudent platform as well as student services referrals through its idibs platform.

Key brands:

Drake International's corporate group within Australia comprises the following key brands:

OPERATIONS, SUPPLY CHAIN AND AFFILIATE DUE DILIGENCE:

During the current reporting period Drake completed a Modern Slavery Risk Assessment of its operations, suppliers and affiliates to ascertain the modern slavery risks.

Core Operations:

Drake International’s operations as a labour hire provider and recruitment company are regulated in Western Australia, South Australia, Victoria, the Australian Capital Territory and Queensland. Drake International holds all necessary permissions which are required to allow it to operate as a recruitment company and labour hire provider within those states. It is a condition of the labour hire licensing laws in South Australia, Queensland and Victoria that Drake International and its directors are fit and proper people and that Drake International remains compliant with the employment laws and work health and safety laws of Australia.

Drake International had a pre-existing Ethics Policy and Whistleblower Policy to ensure that ethical conduct is required and promoted throughout the company. Staff members are encouraged to report any unethical conduct to senior management through the whistleblower hotline.

Drake International has ISO Compliance external audits and regular internal audits to ensure that it maintains appropriate processes and systems to protect and correctly vet its workers and to ensure compliance with applicable laws.

Due to this pre-existing regulation and Drake's pre-existing systems and processes the internal operations of Drake already had strong controls in place to assist in protect against Modern Slavery. During the previous reporting period we sought to improve upon these controls to further reduce the chance of any modern slavery occurring within Drake's supply chains and affiliates. The improvements which were introduced were the Supplier and Affiliate Risk Assessment Investigations detailed below. We also introduced the Process Improvement and Additional Protections which are also detailed below.

Supplier and Affiliate Risk Assessment Investigations:

During the previous reporting period Drake commenced an investigation of its suppliers and affiliates to determine if there was a risk of modern slavery within their operations and supply chains. This occurred as part of a Modern Slavery Risk Assessment and included investigating which suppliers and affiliates:

- held Modern Slavery Policies,
- had a whistle blower mechanism for allowing people to raise concerns about Modern Slavery,
- undertook training on Modern Slavery,
- lodged a Modern Slavery statement,
- provided goods or services in high-risk industries or territories, and
- sourced their own goods or services from high-risk industries or territories.

The investigation involved the following due diligence measures:

1. The provision of a Modern Slavery Questionnaire to all Suppliers.
2. A review of Modern Slavery Policies released by key suppliers and respondents.
3. Online research and due diligence of key suppliers.

This investigation has allowed Drake to identify any potential high-risk suppliers. It will allow us to investigate further these high-risk suppliers over the next financial year.

CONTROLS, PROCESS IMPROVEMENT AND ADDITIONAL PROTECTIONS:

Oversight:

Drake's Compliance and Risk Committee have general oversight of Drake's Modern Slavery program. Quarterly reviews are conducted surrounding the progress of the Modern Slavery program. Drake's board of directors and executive team attend the Compliance and Risk Committee meetings.

A Modern Slavery Working Group have attended to the general rollout of the Modern Slavery compliance program. This working group consists of members of the Legal and Human Resources teams. The Modern Slavery Working Group report to the Chief Financial Officer.

Policies:

As previously covered off, Drake had a pre-existing Ethics Policy and Whistleblower Policy to protect vulnerable members of the company and to ensure that unethical behaviour is encouraged to be reported to senior management.

Drake has established a Modern Slavery Policy to reduce any risk of modern slavery within Drake, its affiliates or its supply chains. Drake's Modern Slavery Policy indicates a zero-tolerance approach to

modern slavery. Any suspected instances of modern slavery are required to be reported to Drake management or through the Drake whistleblower hotline.

Drake has also updated its Procurement Policy to ensure that any new suppliers are vetted for modern slavery compliance. This requires a vetting similar to the supply chain due diligence which was undertaken for Drake's existing suppliers. New supplier contracts are required to contain Drake's modern slavery clause. Any deviation from these requirements require approval from the Drake legal team.

Reporting and Investigation:

Drake's Whistleblower hotline was extended to encompass reporting on any risks associated with Modern Slavery. Alerts are sent out annually within Drake reminding staff of the Whistleblower hotline.

All reports made to Drake's Whistleblower hotline are investigated by Drake.

On a quarterly basis the Drake legal team will report to the Compliance and Risk Committee on any whistleblower allegations made and the progress of those investigations.

Training:

Training has been undertaken for all Drake staff on the Modern Slavery Policy and the Procurement Policy.

Monthly reminders have also been established for all Drake branch managers surrounding the Modern Slavery requirements.

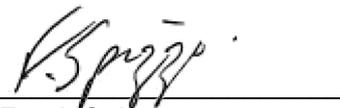
Assessment of Effectiveness:

Drake's Compliance and Risk Committee and Modern Slavery working group review the status of the Modern Slavery compliance program on a regular basis.

Drake's Modern Slavery Policy and Procurement Policy will be reviewed annually.

Regular reviews will be undertaken to assess risks surrounding key suppliers and affiliates.

This statement has been approved by the directors of Drake Australia Pty Ltd



Frank Spizzo
Director

Date: 29/03/2021