

# STAFF DOMAIN

## Modern Slavery & Human Trafficking Statement

*Financial Year 2025–2026*

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### 1. Introduction

Staff Domain is an Australian-owned offshore staffing company with delivery centres in the Philippines and South Africa. We partner with small businesses and mid-market enterprises to provide dedicated, high-performing offshore teams backed by enterprise-grade infrastructure.

We believe that every person, in every country where we operate, deserves to be treated with dignity and respect. Modern slavery, forced labour, and human trafficking have no place in our business or our supply chain.

Staff Domain voluntarily applies the standards required of reporting entities under the Australian Modern Slavery Act 2018 (Cth), notwithstanding that our consolidated revenue currently falls below the AUD \$100 million reporting threshold. Many of our clients are themselves reporting entities, and we believe our statement should give them confidence to rely on it when preparing their own.

This statement addresses the seven mandatory criteria under section 16 of the Act and is informed by the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization's core conventions on forced labour.

### 2. Reporting Entity

This statement is made by:

- Legal entity name: Staff Domain Pty Ltd
- Australian Business Number (ABN): 90 623 080 946
- Registered office: Staff Domain Pty Ltd, 43/52 Parramatta Rd, Homebush NSW 2140, Australia
- Principal place of business: Staff Domain Pty Ltd, 43/52 Parramatta Rd, Homebush NSW 2140, Australia

Throughout this document, references to "Staff Domain", "we", "our", or "us" refer to the entity identified above together with the controlled entities listed in Section 11.

### 3. Our Structure, Operations & Supply Chains

## About Staff Domain

Staff Domain operates as an Employer of Record (EOR) and offshore staffing provider. We recruit, employ, and manage dedicated offshore professionals as full-time staff on behalf of our clients, and we directly manage payroll, taxation, statutory benefits, legal compliance, IT equipment and security, facilities, and human resources for each team member.

We are not a labour-hire marketplace, a recruitment agency, or a body-shop. We do not engage sub-contractors or third-party agencies to fulfil staffing engagements: every individual we place is a direct employee of a Staff Domain entity and is paid directly by us. This direct-employment model is the cornerstone of our modern slavery risk management.

## Operations and Delivery Centres

- Philippines — primary delivery centre (Pasig, Alabang, Pampanga, and Cebu)
- South Africa — secondary delivery centre (Northriding)
- Australia — head office and client-facing operations (Homebush)

## Workforce

Staff Domain directly employs all delivery-centre personnel as full-time employees. Every employee holds a written contract in English and, where appropriate, in their primary working language, and is issued statutory benefits in accordance with the laws of the country in which they are employed.

## Supply Chain

Our Tier 1 supply chain consists of:

- Information technology hardware (laptops, monitors, peripherals) sourced through major distributors
- Software and SaaS platforms (productivity, HRIS, payroll, security tooling)
- Commercial office leasing, facilities management, cleaning, and physical security
- Background screening, identity verification, and right-to-work checking services
- Telecommunications and internet connectivity
- Professional learning, development, and certification providers
- Corporate services (legal, audit, insurance, banking)

Beyond Tier 1, we recognise that our supply chain extends into manufacturing (particularly electronics hardware), and that downstream tiers carry materially higher modern slavery risk. Our roadmap for extending visibility beyond Tier 1 is set out in Section 12.

## 4. Modern Slavery Risks in Our Operations and Supply Chains

We have assessed our modern slavery risk exposure with reference to the Global Slavery Index, the U.S. Department of State Trafficking in Persons Report, and the typologies identified in the

Australian Government's Commonwealth Modern Slavery Statements guidance. The following are the salient risks we have identified.

### Risks in our own operations

Because Staff Domain directly employs all of its delivery-centre staff and pays them above the statutory minimum wage in each jurisdiction, we assess the risk of modern slavery within our own operations as low. The residual risks we monitor are:

- Recruitment-fee charging by unauthorised sub-agents — a known issue in Philippine labour recruitment, where third parties may charge candidates fees in violation of the Philippine Migrant Workers and Overseas Filipinos Act and Department of Migrant Workers regulations.
- Document retention — the unlawful retention of identity documents (passports, national IDs) by recruiters or employers as a control mechanism.
- Debt bondage through training-cost recoupment, equipment bonds, or relocation advances structured in ways that create coercive financial dependencies.
- Excessive working hours, particularly where client demand peaks (e.g. end-of-quarter, support escalations) intersect with employee willingness to overwork.
- Vulnerability of foreign nationals or internal migrants within our workforce who may be less familiar with local labour rights.

### Risks in our supply chain

Our supply chain risks are concentrated in two areas:

- **Electronics and IT hardware manufacturing.** Components in laptops and peripherals — cobalt, tin, tantalum, tungsten, gold — are linked to documented forced and child labour risks in upstream mining (notably the Democratic Republic of the Congo) and to forced labour risks in assembly operations in parts of East Asia, including reports relating to the Xinjiang Uyghur Autonomous Region.
- **Facilities and on-site services.** Cleaning, physical security, catering, and grounds-keeping in both the Philippines and South Africa are sectors where sub-contracted labour, low wages, informal employment, and exploitation of migrant or undocumented workers are documented patterns.

### Country-specific context

- **Philippines:** The 2023 Global Slavery Index estimates a meaningful prevalence of modern slavery, with elevated risks in recruitment for overseas employment, fishing, and domestic work. Our direct-recruitment model is designed to insulate our staff from these channels.
- **South Africa:** Known risks include the exploitation of undocumented migrant workers, particularly in low-wage services and agriculture, and trafficking flows connected to

neighbouring countries. We mitigate these risks by employing directly, verifying right-to-work, and paying above-market wages.

## 5. Our Policies

The following internal policies, owned by named members of our leadership team and reviewed at least annually, directly or indirectly address modern slavery risk.

Policy	Relevance to Modern Slavery
Code of Conduct	Prohibits exploitation, coercion, harassment, and abuse of any person connected to our operations; applies to directors, employees, contractors, and visitors.
Recruitment & Onboarding Policy	Mandates direct recruitment; prohibits the charging of any fee to candidates at any stage (the “Employer Pays Principle”); requires written contracts in language understood by the worker; prohibits retention of identity documents.
Remuneration Policy	Guarantees wages above the local statutory minimum and benchmarked against published living-wage references where available; prohibits punitive wage deductions.
Working Hours & Leave Policy	Sets maximum working hours and overtime in compliance with local labour law; mandates rest days and statutory leave entitlements.
Whistleblower Policy	Provides confidential, anonymous reporting channels (internal and third-party) for staff and external stakeholders; prohibits retaliation against reporters.
Supplier Code of Conduct	Sets binding minimum ethical standards for all third-party partners, including audit rights, cascade obligations, and termination rights for non-compliance.
Grievance & Remediation Procedure	Defines escalation pathways and remediation steps where modern slavery is suspected or identified, including support for affected workers.
Data Privacy & Security Policy	Protects staff and candidate personal information from misuse, including in supplier and screening contexts.

## 6. Due Diligence and Risk Management

### Recruitment

- All staff are recruited and hired directly by a Staff Domain entity. We do not use unlicensed recruitment brokers or sub-agents.
- We apply the Employer Pays Principle: candidates are never charged any fee, deposit, or cost for placement, onboarding, training, or equipment.
- Identity, age, and right-to-work are verified through licensed screening providers before employment commences.
- All employees receive a written contract prior to commencement, in a language they understand, with clear terms on remuneration, hours, leave, termination, and grievance channels.
- No employee is required to lodge identity documents with us at any time.

### **Employment conditions**

- All staff are paid above the statutory minimum wage in their country of employment, with reference to published living-wage benchmarks where these exist.
- Working hours, overtime, rest periods, and statutory leave comply with local labour law. No worker is required to work overtime as a condition of employment.
- Workplaces meet local health, safety, and security requirements, with regular review by facilities and operations leads.
- Staff Domain is the legal Employer of Record for every team member, ensuring direct legal accountability rather than reliance on a third-party labour-hire chain.

### **Supply chain due diligence**

- New suppliers are assessed against our Supplier Code of Conduct before engagement. The Code requires compliance with applicable anti-slavery laws and the core ILO conventions, and requires suppliers to impose equivalent terms on their own suppliers (cascade obligation).
- Higher-risk supplier categories (facilities, cleaning, security, IT hardware) are subject to enhanced due diligence, including documented questionnaires, evidence requests, and — where warranted — site visits or third-party audits.
- We reserve the contractual right to audit suppliers (directly or through nominated third parties), to require corrective action plans where issues are identified, and to terminate engagements for unremediated non-compliance.
- Where a supplier is unwilling to sign our Supplier Code of Conduct, we record the deviation, assess the risk, and either obtain equivalent written assurances or replace the supplier.

## **7. Remediation Framework**

Prevention is our primary objective, but a credible modern slavery programme must also be ready to remediate. If an indicator of modern slavery is identified — whether in our own operations or in our supply chain — we follow this framework:

- **1. Immediate protection.** The safety and welfare of any potentially affected worker is the first priority. Continued payment of wages is maintained during investigation. No retaliatory action is taken against any person reporting in good faith.
- **2. Investigation.** Reports are investigated by our Compliance function, escalated to executive leadership, and, where appropriate, supported by independent external specialists.
- **3. Worker-centred remediation.** Remediation prioritises the affected worker's interests, which may include repayment of unlawfully charged fees, repatriation support, ongoing employment where the worker chooses, or referral to specialist NGOs or government agencies.
- **4. Supplier consequence management.** Where a supplier is implicated, we will require a corrective action plan with verification, and we reserve the right to terminate the supplier relationship for unremediated breaches.
- **5. Reporting to authorities.** Where evidence indicates criminal conduct, we will report to the appropriate law enforcement authority in the relevant jurisdiction.
- **6. Systemic learning.** Every substantiated case results in a documented review of root causes and updates to policies, training, and controls.

## 8. Grievance Mechanisms

In line with the United Nations Guiding Principles on Business and Human Rights (effectiveness criteria for non-judicial grievance mechanisms), we provide reporting channels that are accessible, confidential, and non-retaliatory.

- **Internal:** All Staff Domain employees may raise concerns confidentially through their line manager, People & Culture, the Compliance function, or executive leadership.
- **Anonymous:** An anonymous reporting channel is available to all employees and is monitored by Compliance, independent of operational management.
- **External stakeholders:** Suppliers, supplier workers, clients, and members of the public may raise concerns by emailing [compliance@staffdomain.com](mailto:compliance@staffdomain.com). Reports may be made anonymously.
- **Local language:** Reports may be submitted in English, Filipino, or any of the official languages of South Africa, and will be acknowledged and addressed.
- **Non-retaliation:** Retaliation against any person who raises a concern in good faith is itself a serious disciplinary matter, irrespective of whether the underlying concern is substantiated.

## 9. Actions Taken During the Reporting Period

During the financial year 2025–2026, Staff Domain has:

- Issued a refreshed Supplier Code of Conduct incorporating express anti-slavery commitments, audit rights, cascade obligations, and termination rights for unremediated non-compliance.
- Reaffirmed and documented our Employer Pays Principle, prohibiting any charge to candidates for placement, onboarding, training, or equipment.
- Reviewed and strengthened our whistleblower framework, including the addition of an anonymous external-facing channel for non-employees.
- Embedded modern slavery awareness into onboarding for all new employees, with role-specific modules for managers, recruiters, and Client Success staff.
- Commenced a documented Tier 1 supplier mapping exercise across both delivery centres, with risk-based prioritisation of facilities, cleaning, security, and IT hardware suppliers.
- Established this statement as an annually-reviewed governance artefact, approved by the Board and signed by a Director.

## 10. Measuring Effectiveness

We assess the effectiveness of our modern slavery programme through a defined set of indicators that are tracked internally on at least an annual basis. Our framework covers four categories:

- **Reporting and case outcomes** — the volume of modern-slavery-related concerns raised through our grievance channels, the proportion investigated within target timeframes, and the outcomes of any substantiated cases.
- **Training and awareness** — completion rates for modern slavery awareness training across all staff, with deeper coverage for managers, recruiters, and Client Success roles.
- **Supply chain controls** — coverage of our Supplier Code of Conduct across Tier 1 suppliers, depth of enhanced due diligence on higher-risk categories, and progress against our Tier 2 visibility roadmap.
- **Workforce indicators** — recruitment process audits confirming zero candidate fees charged, retention of identity documents (target: zero), and favourable response rates on respect-and-treatment questions in our employee engagement surveys.

Our Compliance function reviews these indicators at least annually and reports results to executive leadership and the Board. Where an indicator moves in the wrong direction or remains stagnant, we document the cause and the corrective response. Underlying figures are not published in this statement but are made available to clients undertaking due diligence on a confidential basis on request.

## 11. Consultation with Controlled Entities

In preparing this statement, the reporting entity consulted with each of the Staff Domain entities it owns or controls, including:

- Staff Domain (PH) Inc — the entity through which our Philippine delivery-centre staff are employed.
- Staff Domain (Pty) Ltd — the entity through which our South African delivery-centre staff are employed.

Consultation was conducted through the Group Compliance function and involved the local managing directors, People & Culture leads, and Operations leads of each entity. Each controlled entity reviewed the country-specific risk content of this statement and confirmed that the policies and controls described are operative in their jurisdiction.

## 12. Looking Ahead

In the next reporting period, Staff Domain will:

- Complete Tier 1 supplier mapping in both delivery centres and begin targeted Tier 2 inquiry for IT hardware and facilities categories.
- Introduce a worker-voice mechanism (anonymous pulse-survey) specifically covering treatment, recruitment, and fee-charging questions, separate from general engagement surveys.
- Pilot independent third-party audits for our highest-risk facilities and cleaning suppliers.
- Publish this statement on the Australian Government’s Modern Slavery Statements Register as a voluntary submission.
- Review our Supplier Code of Conduct against the latest guidance from the Australian Anti-Slavery Commissioner.

## 13. Approval

This statement has been prepared in accordance with the principles of the Australian Modern Slavery Act 2018 (Cth) and addresses each of the seven mandatory criteria in section 16 of that Act on a voluntary basis. It has been approved by the Management of STAFF DOMAIN PTY LTD as the principal governing body of the reporting entity, and is signed by a responsible member of that Board.

**Signed:**

*Justin Pausie*

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**Name:** \_\_\_\_\_

**Title:** \_\_\_\_\_

**Entity:** \_\_\_\_\_

**Date:** \_\_\_\_\_

*This statement will be reviewed and reissued annually. Questions, concerns, or grievance reports may be directed to [compliance@staffdomain.com](mailto:compliance@staffdomain.com).*