

Human Rights Position Statement

McMillan Shakespeare Group (MMS)

December 2024



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Introduction

This Statement applies to McMillian Shakespeare Group (MMS) and its owned subsidiaries. It outlines MMS' approach to human rights, the rights of our people, engagement with our stakeholders in relation to human rights and how we operationalise this Statement.

MMS Human Rights Position Statement

At MMS, we believe that respecting human rights is fundamental to our purpose of making a difference to people's lives.

We are focused on a corporate governance and risk management culture that supports responsible business conduct. The MMS Code of Conduct ("Code"), which is underpinned by our Purpose and Values, provides an ethical and behavioral framework to guide the business decisions we make every day.

Our Human Rights Position Statement builds upon our Code, to reflect our understanding of fundamental human rights and our commitment to respect those rights.

We draw our understanding of human rights from:

- the International Bill of Human Rights and related declarations, covenants and conventions; and
- the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Our approach to respecting and upholding human rights is informed by the United Nations Guiding Principles on Business and Human Rights, which states that businesses have a responsibility to:

- Avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur; and
- Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.

MMS' approach to respecting human rights recognises that some groups of people are more vulnerable to human rights violations such as Aboriginal and Torres Strait Islander people, people with a disability and migrants from non-English speaking backgrounds. Our Reflect Reconciliation Action Plan outlines our vision for reconciliation, is an Australia where Aboriginal and Torres Strait Islander peoples have access to equal opportunities for participation in the social, economic and political fabric of Australia to achieve their goals in life. Through our Access and Inclusion Plan we aim to foster a diverse and inclusive workplace and enhance the accessibility of our products and services to help promote equitable economic, social opportunities and inclusion.

MMS opposes all forms of modern slavery. Our Modern Slavery Statement outlines our approach to modern slavery risk, our progress and initiatives to help mature our approach to modern slavery risks.

Our people

At MMS, we strive to foster an engaged, connected and inclusive culture that gives our people rewarding careers and opportunities to grow and succeed both professionally and personally.

We are committed to respecting and upholding the human rights of our people at MMS. Specifically, we have identified the following rights as most salient to our workforce:

- Labor rights: the right of all people to just and favorable terms of employment

- Health and safety: the right of all people to enjoy a physically and psychologically safe work environment
- Diversity, equity and inclusiveness: the right of all people to be respected and valued for their differences, with equitable opportunities and outcomes, in an inclusive environment.

These rights of our people are protected and upheld through a suite of human resources policies, systems, programs and practices.

Our supply chain

Our responsibility to respect human rights extends beyond the direct operations of MMS and our subsidiaries into our direct supply chain, where we seek to gain a view of human rights, possible modern slavery risks and influence where practicable, the broad adoption of labour and human rights.

In accordance with our Procurement Policy and Supplier Code of Conduct, we take a continuous improvement approach to understand possible human rights risks within our supply chain. We perform a modern slavery risk assessment of our direct suppliers on an annual basis, engage with relevant suppliers to increase awareness of human rights obligations and support relevant suppliers to reduce the risk and remediate adverse human rights impacts, if they occur.

Customer-client relationships

MMS is a provider of salary packaging, novated leasing, disability plan management, support coordination, asset management and related financial products and services.

We recognise our role in the communities in which we operate with our brands being trusted partners to many government, not-for-profit and corporate sector clients and National Disability Insurance Scheme (NDIS) participants. We recognise our responsibility to provide our clients and customers with products and services that meet their needs which align with our vision of making complex matters simple and align with being a responsible business.

Operationalising this Statement

We operationalise our human rights obligations through the MMS Code of Conduct and related suite of policies, supported by an annual compliance training program.

Initiatives implemented through our human resources and sustainability strategies seek to realise our commitment to foster a more inclusive and equitable workplace and implement responsible supply chain practices.

We understand that human rights due diligence, particularly within our supply chain, is a process of continuous improvement. We take a risk-based approach to prioritise and focus our efforts on direct suppliers in higher risk categories identified in our annual modern slavery risk assessment. Our Modern Slavery Statement outlines our due diligence approach and supporting policies and processes.

Grievances and remediation

MMS supports open and transparent working relationships where concerns can be safely voiced and investigated without fear of retaliation. We encourage all MMS people and other stakeholders to speak up about issues and concerns using the mechanisms outlined within our [Whistleblower Policy](#).

If an instance of actual or suspected modern slavery is identified and brought to our attention, we will respond to remediate the issue in accordance with MMS' Modern Slavery Remediation Process. The welfare of any victims or potential victims will be at the center of any and all decision-making.

Governance and monitoring

The MMS Board of Directors has adopted this Human Rights Position Statement on behalf of MMS. They have delegated the responsibility for implementation of this Statement to the Executive Leadership Team that report to the MMS CEO and Managing Director. The management-level Sustainability Committee oversees the operationalisation of this Statement and reports as necessary to the Board.

Related documents

- Anti-Bribery and Anti-Corruption Policy
- Code of Conduct
- Complaints and Feedback Policy
- Diversity Equity and Inclusion Policy
- Equal Opportunity and Diversity Policy
- Modern Slavery Statement
- Procurement Policy
- Privacy Policy
- Supplier Code of Conduct
- Sustainability Report
- Whistleblower Policy