



Modern Slavery Statement

COVERING THE PERIOD OF 01 JANUARY 2020 TO 31 DECEMBER 2020

01 June 2021

imagine your future®

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Contents

1. Introduction
2. Structure, Operations and Supply Chain
3. Risk of Modern Slavery in our Operations and Supply Chain
4. Actions Taken to Assess and Address Modern Slavery Risks
5. Effectiveness of Actions Taken
6. Future Commitments

Introduction



About This Statement

The Australian Border Force requires organisations with annual revenue greater than \$100M globally to comply with the requirements of the Australian Modern Slavery Act 2018. ISG has prepared this inaugural Modern Slavery Statement which covers the company's activities during the financial year ending 31 December 2020.

ISG takes very seriously our responsibility to ensure that neither our operations nor our supply chain participate in any form of human exploitation anywhere in the world.

ISG is committed to the fight against Modern Slavery and its eradication and will continue to make every effort to respect human rights throughout our business and conduct our operations responsibly and ethically.

This statement is made pursuant to section 13(1) of Modern Slavery Act (Commonwealth) 2018 and has been approved by the ISG's Internal Executive Board.

In approving this statement, the ISG Board has satisfied itself that adequate due diligence has taken place to identify, manage and mitigate any risks of human exploitation anywhere in ISG's operations and supply chain.



Michael P. Connors
Chairman & Chief Executive Officer

Structure, Operations and Supply Chain

About ISG

ISG (Nasdaq: III) is a leading global technology research and advisory firm that helps corporations, public sector organisations and service and technology providers achieve operational excellence and faster growth. A trusted business partner to more than 700 clients, including more than 75 of the top 100 enterprises in the world, ISG specialises in digital transformation services, including robotics process automation, cloud and data analytics; sourcing advisory; managed governance and risk services; network carrier services; technology strategy and operations design; change management; market intelligence and technology research and analysis.

Headquartered in Stamford, Connecticut, ISG employs more than 1,300 professionals globally and operates in more than 21 countries. ISG operates in Australia as a registered business (ABN 85 108 959 360).

ISG was formed 14 years ago, but our flagship companies have been in business much longer. Compass began in 1980 and TPI in 1989. Today as ISG we have more than 40 years of experience helping clients achieve operational excellence.

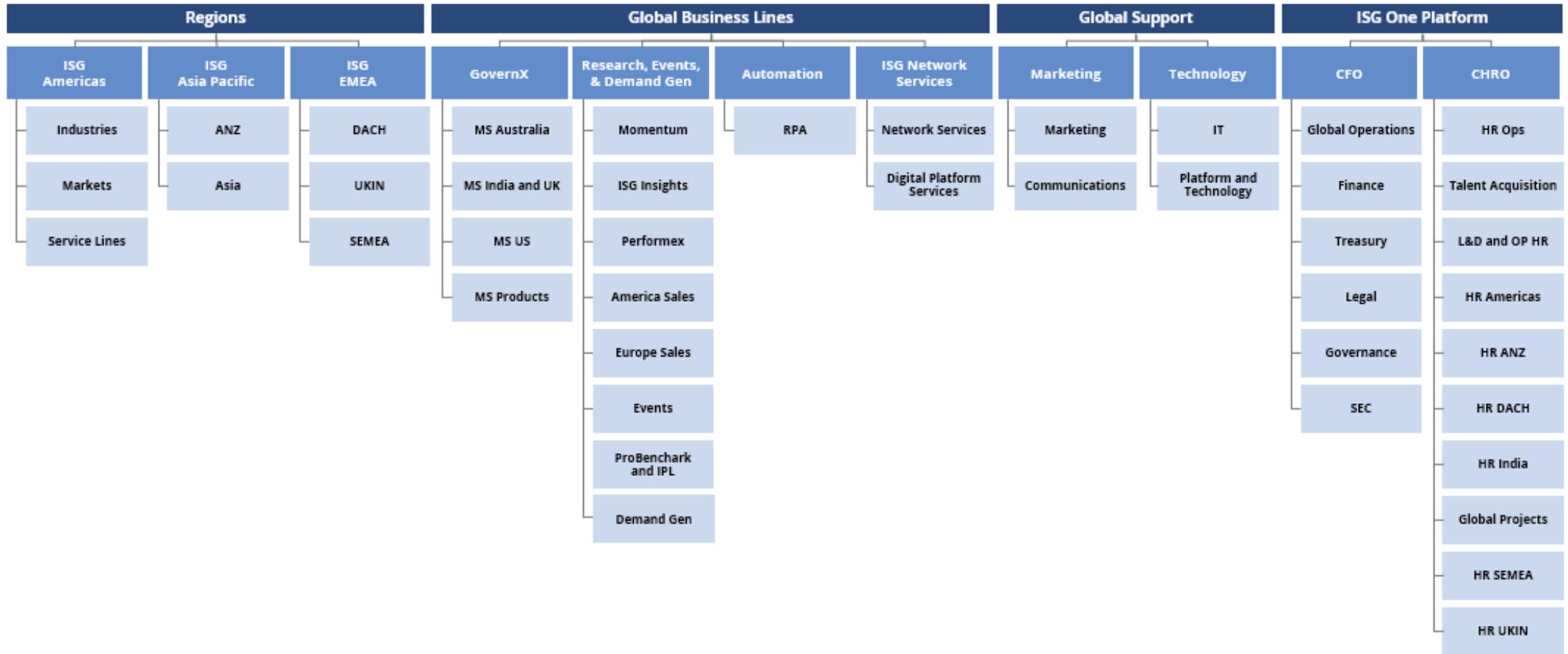
ISG has grown bigger and stronger to meet the demands of the digital revolution, adding new capabilities sprung from the innovative minds of our people, or incorporated through a series of acquisitions—including our game-changing combination with Alsbridge in 2016.

ISG's Global Structure

Our Vision: "To create an industry-leading, high growth, information-based services business".

ISG Chairman and CEO

ISG Executive Board



ISG Operations

ISG's workforce consists mostly of remote workers, operating from various locations to serve our clients globally.

In addition to the remote workforce, ISG also has offices in key locations around the world.

ISG Global Footprint

ISG operates as a virtual global company, deploying our highly mobile workforce to any jurisdiction around the world in which our clients conduct their business.



ISG Office Locations

USA
Connecticut
Texas
Brazil
Canada
Mexico

EMEA	
Denmark	Nordics
Finland	Spain
France	Sweden
Germany	Switzerland
Italy	United Kingdom
The Netherlands	

APAC
Australia
India
Japan
Republic of Korea
Singapore



The Industry Pioneer.
Still Leading the Way.

700

Clients Served Annually

20

Countries

1300

Professionals

ISG's Supply Chain

ISG's Global Supply Chain

As part of conducting business, ISG relies on a supply chain within the Information Technology industry, Finance, Events and Marketing, HR as well as other consulting companies around the world.

In our operational centres, we interact with suppliers at both a global and local level. Some services are derived from global suppliers and distributed across our international workforce, but many others are smaller, local suppliers.



Risk of Modern Slavery in our Operations and Supply Chain

Potential Risks in Our Operations

Our Operation

Commencing at the beginning of the reporting period, ISG has undertaken a comprehensive review of its operations and supply chain, involving all business units within its structure, to ensure that any potential risk of human exploitation has been identified and appropriately managed.

As part of our Modern Slavery compliance review, ISG acknowledged the need to develop a Modern Slavery Risk Management Framework to ensure that all employees has sufficient visibility and understanding of their responsibilities in identifying and mitigating any risks of human exploitation.

ISG also recognised that we needed to strengthen several policies, including employment-related policies and processes to ensure individuals did not unintentionally engage in any practices which may contribute to Modern Slavery in any form.

ISG has initiated Modern Slavery awareness training for employees and contractors in Australia which includes identifying signs of Modern Slavery, what to do if Modern Slavery is suspected and how best to avoid Modern Slavery in ISG's operations and supply chain.

Potential Risks in Our Supply Chain

Our Supply Chain

ISG acknowledges that we, as a global organisation, have a wide-ranging supply chain which may expose us to potential risk of Modern Slavery. As such, ISG has undertaken an extensive assessment of its supply chain to identify and mitigate any potential risks.

As most companies around the world, ISG consumes electronic goods such as laptops, mobile phone and other equipment as part of carrying out of business as an advisory, technology and research organisation. ISG is acutely aware of the intrinsic risks, associated with the production of electronic goods in high-risk countries and as such, ISG is collaborating with its peers and its suppliers to put pressure on suppliers to eliminate any risks of human exploitation in the manufacturing and distribution of the electronic goods, consumed by ISG.

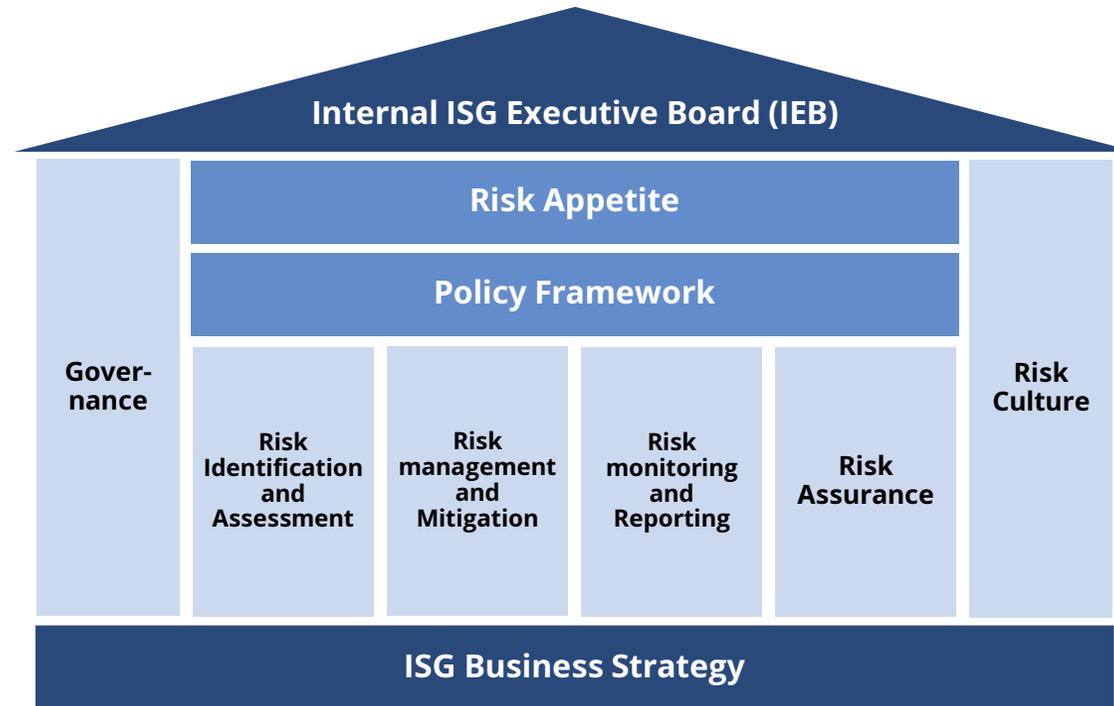
As an organiser of global events, ISG is also aware that potential risk may exist in certain food and hospitality industries and ISG has undertaken a thorough review of its catering and hospitality supply chain to ensure that any potential risk was identified and mitigated.

Overall, ISG has improved its management of suppliers, from onboarding due diligence to ongoing management and monitoring for any red flags. ISG has also instigated a Supplier Code of Conduct which requires its suppliers to ensure that there is no Modern Slavery in their own operations, nor in that of their suppliers.

Actions Taken to Assess and Address Modern Slavery Risks

Modern Slavery Risk Management Framework

ISG's **Modern Slavery Risk Management Framework** forms the backbone of our commitment to the eradication of business-related human exploitation.



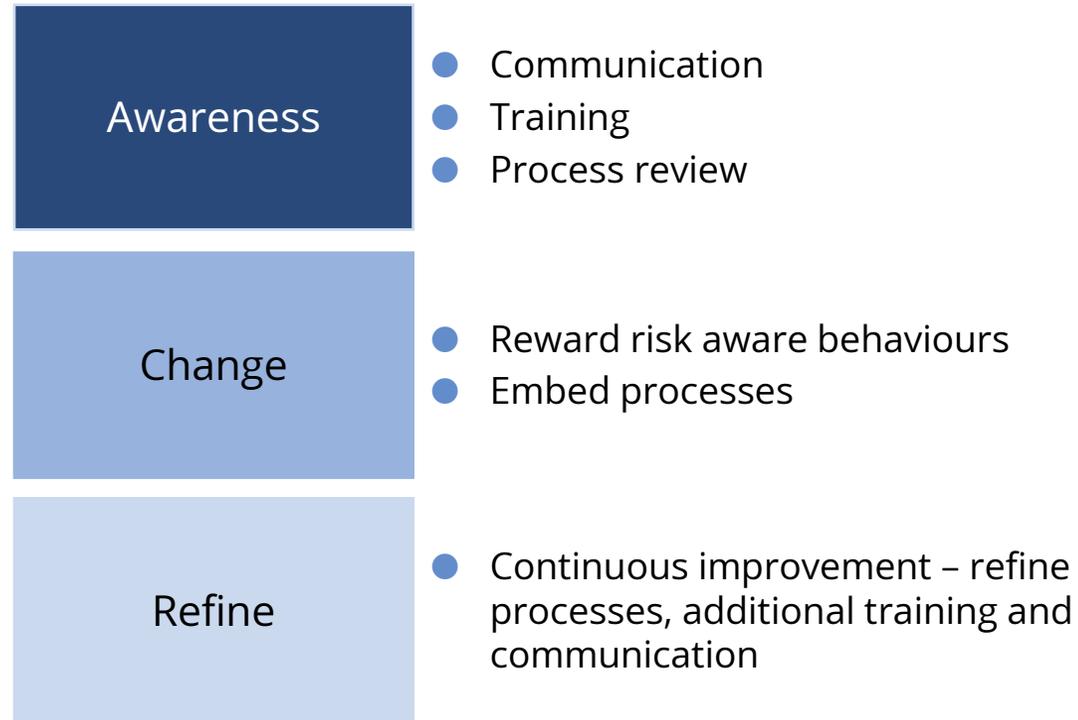
The IEB is accountable for ISG ANZ's compliance with Modern Slavery Act 2018. The IEB signs off on ISG ANZ's Modern Slavery Statements

As per the Modern Slavery Act requirements, the ISG Modern Slavery statement must be approved by the Internal ISG Executive Board (IEB).

Before the Modern Slavery Statement is approved, the IEB must satisfy itself that adequate due diligence has taken place to identify, manage and mitigate any risks of human exploitation anywhere in ISG's operations and supply chain.

Operationalisation of ISG Modern Slavery Framework

As part of ISG's operationalisation of the Modern Slavery Framework, we have mapped out our path to a positive risk culture which emphasises zero-tolerance for human exploitation in our operations and supply chain.



Operationalisation of ISG Modern Slavery Framework

The cornerstones of our Modern Slavery Risk Management Framework are:

Risk Appetite

The cornerstone for any effective risk appetite framework involves the development of a risk appetite statement.

At its most fundamental level, risk appetite is the level of exposure an organisation is willing to take in pursuit of strategic objectives.

In ISG's case, the Risk Appetite is "Low" which means that ISG has zero appetite for any human exploitation within its operations or supply chain.

Policy Framework

ISG undertakes regular reviews of its policies to ensure that policies always remain adequate and relevant globally.

In preparation for the Modern Slavery Act, ISG undertook a review of all policies with particular focus to the Modern Slavery Act and as a result, updated several policies and introduced a new policy, namely the Supplier Code of Conduct.

The Supplier Code of Conduct sets out the expected behaviours of ISG's suppliers, not just in terms of compliance to the Modern Slavery Act but also in relation to how ISG expects its suppliers to conduct themselves and treat their suppliers.

ISG employees, contractors and suppliers can report any suspected Modern Slavery concerns to a Whistle-blower email address.

Governance

ISG has put in place a Modern Slavery Risk Management Framework which clearly identifies key stakeholders responsible for due diligence at supplier onboarding as well as on-going management and monitoring of ISG's supply chain.

The framework also identifies internal and external reporting requirements, including frequency, content and audience.

Operationalisation of ISG Modern Slavery Framework

The cornerstones of our Modern Slavery Risk Management Framework are:

Business Strategy

The United Nations and the Walk Free Foundation estimate that there are approximately 40 million victims of Modern Slavery around the world.

ISG believes that our clients want us to be a leader in the eradication of human exploitation globally. Hence, ISG has implemented a strong internal framework to ensure we are not linked or contribute to any Modern Slavery risks.

ISG has also developed a professional service which helps our clients identify, assess, manage and mitigate any Modern Slavery risks in their operations and supply chain.

Risk Culture

Risk culture is the “set of encouraged and acceptable behaviours, discussions, decisions and attitudes toward taking and managing risk within an organisation.”

As part of the Modern Slavery obligations, ISG has undertaken a commitment to build a positive risk culture where employees at every level appropriately manage risk as an intrinsic part of their day-to-day work. ISG believes that a positive risk culture supports an open discussion about uncertainties and opportunities, encourages everyone to express concerns, and maintains processes to elevate concerns to appropriate levels.

This is particularly important when expressing concerns in relation to unethical behaviours, including Modern Slavery.

Risk Management

ISG believes that Modern Slavery and any other Third-Party Risk Management should be enabled by technology. Hence, ISG has invested in a Third-Party Risk Management technology which allows ISG to identify, assess, manage, mitigate and report on any Modern Slavery risks in our operations and supply chain.

ISG uses the latest in automation, including auto-scoring of risks, to efficiently and effectively manage any potential risks.

Actions Taken – ISG Operation and Supply Chain

During the reporting period, ISG has taken several important steps to identify and address Modern Slavery practices in our operations and supply chain. We have implemented a robust Modern Slavery Risk Management Framework and initiated improvements to the due diligence of our supply chain engagements. ISG has also reviewed and updated all policies to ensure compliance with the Modern Slavery Act.

Actions Taken During the Reporting Period:

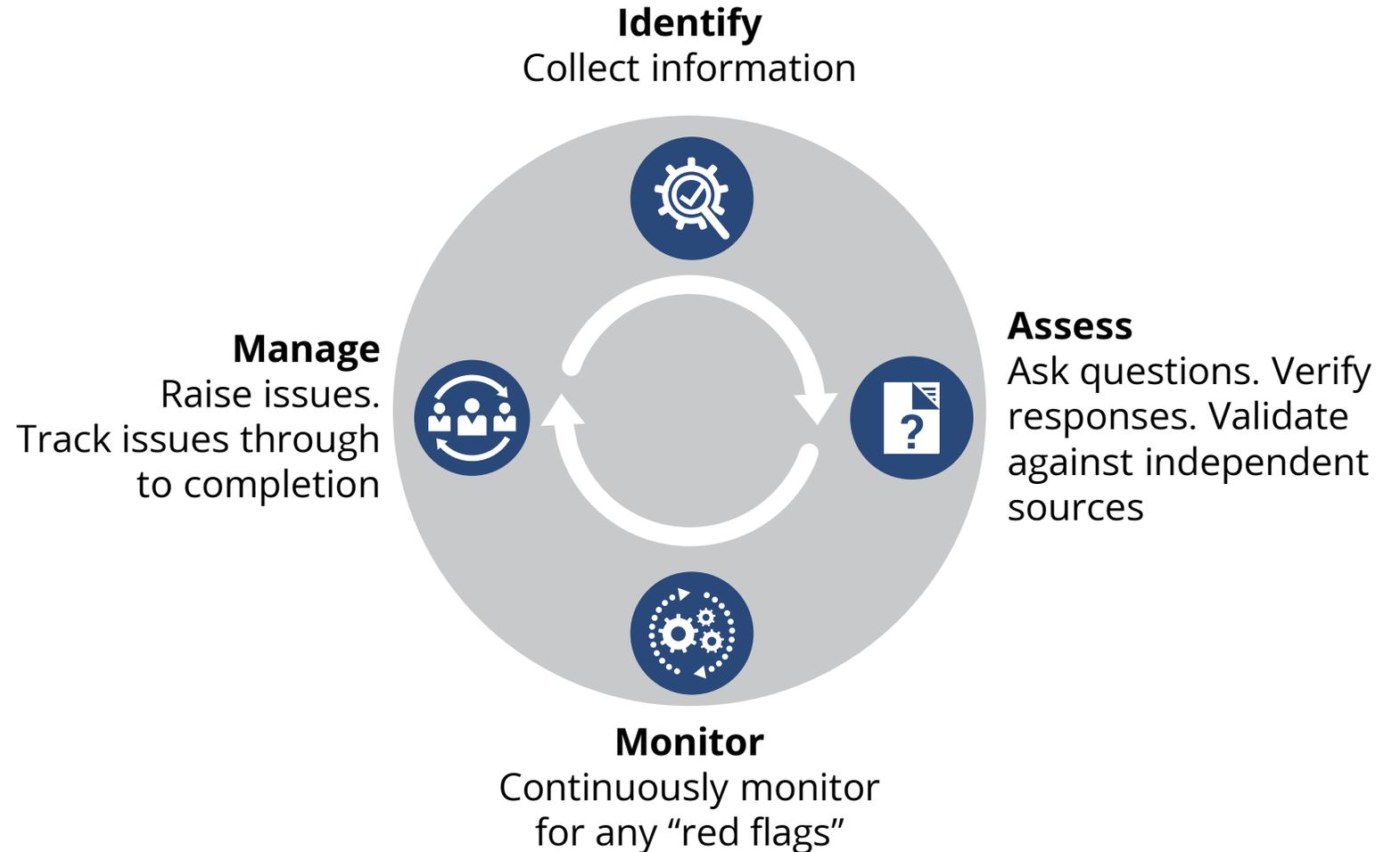
- Developed and communicated a Modern Slavery Risk Management Framework to employees and contractors
- Updated ISG's existing policies such as Code of Ethics and Business Conduct, Whistle-blower and Travel and Entertainment Expense policies
- Developed ISG's Supplier Code of Conduct which includes obligations to comply with the Modern Slavery Act
- Included Modern Slavery specific clauses in ISG's standard contract templates, including a requirement for suppliers to comply with ISG's Supplier Code of Conduct
- Initiated Modern Slavery Awareness Training rolled out to Australian employees and contractors
- Issued the Modern Slavery Questionnaire to suppliers to assess any potential risk in ISG's supply chain
- Collated and reported on Modern Slavery Questionnaire results, actions and issues to the ISG Internal Executive Board for review and sign off as part of the Modern Slavery Statement requirements.

ISG's Approach to Modern Slavery Risk Identification

As part of ISG's Modern Slavery Risk Management Framework, we have developed a robust and repeatable process to identify, assess, manage and continuously monitor for any signs of Modern Slavery risks in ISG's operations and Supply Chain.

ISG uses the latest technology, including automation to ensure consistency and efficiency in its identification of risk.

ISG's Modern Slavery Risk Management are qualified risk professionals, applying risk management best practice to the Modern Slavery risk identification.



Case Study

Assessing our Suppliers

The GovernX technology and managed services are provided from Bangalore to ISG's ANZ GovernX clients. For our Bangalore office operations, ISG relies on a local supplier to supply security as well as housekeeping staff. When assessing the supplier's compliance to the Modern Slavery Act, we identified the following issues:

- The supplier had no Modern Slavery or Code of Conduct in place
- The supplier had no Whistle-blower mechanism in place to report concerns

The Walk Free Foundation's Global Slavery Index considers India a High-risk country due to the relatively high occurrence of Modern Slavery. An estimated 8 million people in India are subject to some form of human exploitation.

When considering the potential risk of Modern Slavery in this case, ISG considered the fact that workers employed as housekeeping staff are often unskilled and may have migrated to the cities in search for work, leaving them potentially vulnerable to exploitation.

Despite demonstrable shortcomings in the supplier's policies, ISG did not find any evidence of Modern Slavery within the supplier's operations during our investigation. However, ISG will continue to work with the supplier to get a better understanding of the supplier's labour hire practices and onboarding processes to ensure there are no risks of human exploitation.

Awareness and Training

Awareness, Training and Communication

- Implemented Modern Slavery training for Australian employees and contractors
- Embedded Modern Slavery Risk Management processes in ISG's operations such as finance, HR and IT.

In establishing training requirements for compliance with the Modern Slavery Act, ISG took the decision to purchase off-the-shelf, high quality training material from an external training provider. This material was tested by ISG's Modern Slavery Risk Management team to ensure applicability and relevance to the end goal of making all staff, employees as well as contractors, aware of Modern Slavery in all its forms and what to do if they encounter an occurrence of this unethical practice.

The training also outlines what to do in a case of suspected slavery-like condition, i.e., not confront the individual or cause a scene as this will likely lead to increased harm for them. Instead, follow the ISG Whistle-blower Procedures or, in urgent cases, contact the relevant authorities.

The Impact of COVID-19 on ISG'S Operations and Supplier Chain

Globally, ISG, our partners, and our supply chain, have experienced unprecedented business disruption due to the impacts of the COVID-19 pandemic.

We understand and acknowledge that there may be increasing vulnerabilities to workers within our operations and supply chain, as a result to the Covid-19 pandemic, and the real prospect of exploitation and greater modern slavery risks within certain jurisdictions. We will continue to monitor these potential risks via our Modern Slavery Risk Management processes.

As the safety and well-being of our employees, clients and suppliers is our priority, we worked closely with all those who were affected to ensure continuity of business delivery in a COVID safe manner, security of employment and maintenance of pay and conditions for our employees.

For our all employees, we adjusted our way of working by enabling around 1300 employees to work from home and providing mental wellbeing support from our Human Resources team, globally. This was particularly paramount for our employees performing critical services in India.

ISG will continue to prioritise the safety and well being of our people, suppliers and supply chain throughout this pandemic and beyond.

Effectiveness of Actions Taken

Assessment and Effectiveness of Our Actions

ISG supports the United Nations Guiding Principles as the global standard for preventing and addressing business-related human rights harm. ISG also understands and accepts its responsibility to respect human rights wherever we operate around the world.

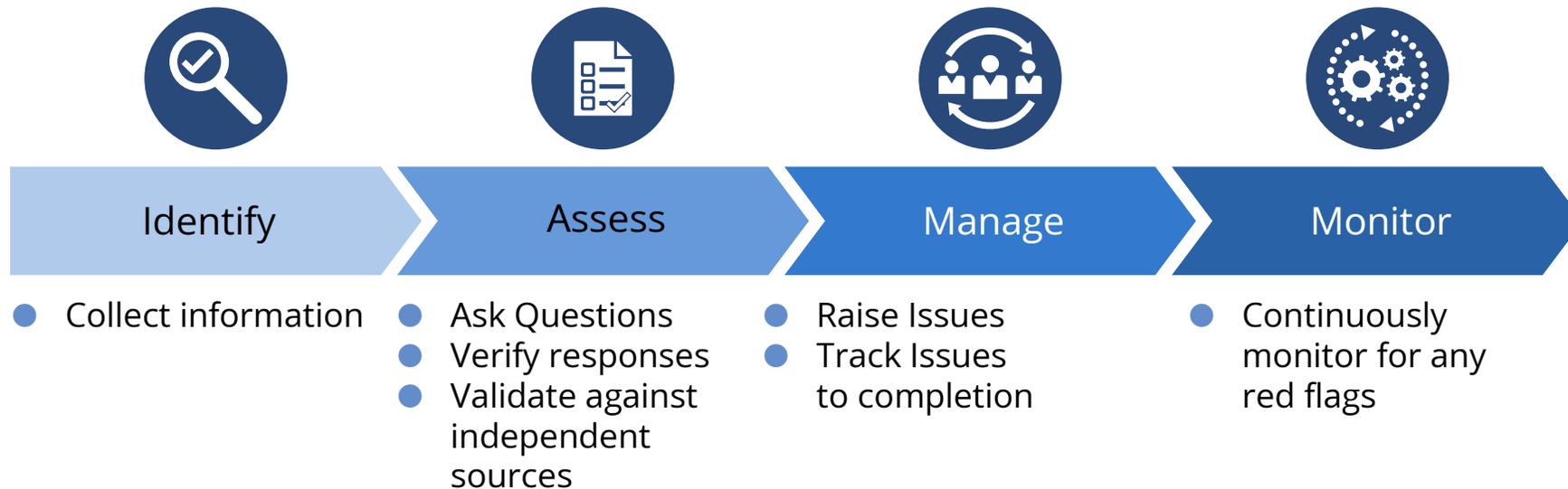
ISG recognises that this inaugural Modern Slavery Statement reflects only the beginning of ISG's journey towards ensuring there is no human exploitation anywhere in our operations and supply chain.

During the initial reporting period, ISG's focus has been on building the foundation for a structure which will underpin ISG's commitment to the UN Guiding Principles and the Modern Slavery Act:

- Established a Modern Slavery Risk Management Framework, including policies, processes and procedures to operationalise the framework across the organisation
- Conducted a comprehensive review of ISG's operations and supply chain
- Sent out Modern Slavery questionnaires to ISG's suppliers, assessed responses and raised issues where appropriate
- Updated contractual commitments to include Modern Slavery provisions for any supplier with ISG supply chain

Assessment and Effectiveness of Our Actions – The How

ISG has conducted an extensive assessment of our suppliers, using third party risk management technology to ensure detection of any risks throughout the risk lifecycle:



Assessment and Effectiveness of Our Actions

ISG has reviewed its supplier onboarding due diligence process and improved the process to include financial risks as well as non-financial risks such as cyber security incidents, data breaches, adverse media, lawsuits globally, Politically Exposed Persons (PEP), sanctions as well as any connection to Modern Slavery practices anywhere in the world.

ISG has also categorised its suppliers into High, Medium and Low risk, based on industry, location and other key risk indicators. ISG has leveraged the key principles from the Walk Free Foundation's Global Slavery Index to perform our categorisation. The categorisation has enabled ISG to focus on High-Risk suppliers to mitigate any risk found to be outside ISG's risk appetite.

While the review did identify some suppliers as presenting a high inherent risk, ISG has found that the risk could be mitigated to an acceptable level by working closely with the relevant suppliers, e.g., ensuring that suppliers are aware of the Modern Slavery Act and understand their obligations under the Act.

While ISG recognises that we must continue to improve and strengthen our Modern Slavery Risk Management processes, we believe that our assessment of Modern Slavery risks in our operations and supply chain, as outlined in this inaugural statement, has been rigorous, comprehensive and effective.

Future Commitments

Future Commitment

ISG's actions during the next reporting period (01 January 2021 to 31 December 2021):

- Continue to enhance our Modern Slavery Risk Management Framework and processes by further increasing our maturity in the area of Modern Slavery identification and mitigation
- Continue to develop a positive risk culture within ISG where staff at every level appropriately manage risk as an intrinsic part of their day-to-day work. We will do this through communication and risk awareness programs
- Continue to work with our supply chain to ensure that the awareness of the Modern Slavery Act and its obligations is communicated and recognised by all parties which together make up our supplier ecosystem
- Work with peers and industry bodies such as **Stop the Traffik** and **Be Slavery Free** to eliminate human exploitation through membership of local and global organisations, aligned to the UN Guiding Principles
- Continue to expand our Modern Slavery Awareness training to our employees and contractors
- Undertake "deep dives" into selected suppliers and their supply chain to test the effectiveness of our Modern Slave Risk Management Framework and processes.

Thank you





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