



Australian Government

Fair Work

OMBUDSMAN

ENFORCEABLE UNDERTAKING

Between

The Commonwealth of Australia

(as represented by the Office of the Fair Work Ombudsman)

and

UAE EXCHANGE AUSTRALIA PTY LTD

(ACN 106 948 092 / ABN 79 106 948 092)

PARTIES

1. This enforceable undertaking (Undertaking) is given to the Fair Work Ombudsman (FWO) pursuant to section 715 of the *Fair Work Act 2009* (Cth) (FW Act) by UAE Exchange Australia Pty Ltd (ACN 106 948 092 / ABN 79 106 948 092) (the Company).

COMMENCEMENT OF ENFORCEABLE UNDERTAKING

2. This Undertaking comes into effect when:
 - (a) the Undertaking is executed by the Company; and
 - (b) the FWO accepts the Undertaking so executed.
3. Upon the commencement of this Undertaking, the Company undertakes to assume the obligations set out below.

BACKGROUND:

4. The Company is engaged in the business of providing money remittance and foreign currency exchange services. As at June 2018, the Company operates in Australia through its head office and at 30 branches, and employs approximately 118 staff.
5. In October 2015, the FWO commenced an investigation after it received a Request for Assistance (RFA) from a former employee of the Company, Employee 1 (see Attachment A) alleging underpayment of wages for work performed at the Company's branches in Queensland.
6. In June 2016, the FWO received further RFAs from former employees Employee 2 and Employee 3 (see Attachment A) alleging underpayment of wages for work performed at the Company's two branches in Adelaide, South Australia. This Undertaking refers to the three individuals collectively as the Employees.

Relevant Industrial Instruments

7. The terms and conditions of the Employees' employment with the Company were governed by the FW Act and the *General Retail Industry Award 2010* [MA000004] (Retail Award).
8. For the purposes of determining rates of pay prior to 30 June 2014 (the Transitional Period), the applicable pre-modern award for Employee 2 and Employee 3 is the *Retail Industry (South Australia) Award* [AN150130] and for Employee 1, the *Retail Industry Award – State 2004* [AN140257].

The Employees' status and classification

9. The Employees were employed as follows:
 - (a) Employee 1 as a casual Branch Executive/Teller from 6 July 2011 to 21 October 2015 at the Company's branches in Queensland.
 - (b) Employee 2
 - (i) as a casual Branch Executive/Teller from 20 December 2011 to 30 November 2013 at both of the Adelaide branches; and
 - (ii) as a full-time Branch Executive/Teller from 1 December 2013 to 15 July 2014 at both of the Adelaide branches.
 - (c) Employee 3
 - (i) as a casual Branch Executive/Teller from 27 September 2010 to 30 September 2011 at the Adelaide branches;
 - (ii) as a full-time Branch Executive/Teller from 1 October 2011 to 15 April 2013 at the Adelaide branches; and
 - (iii) as a full-time Senior Executive - Adelaide region from 16 April 2013 to 23 July 2014, with supervisory responsibilities for all South Australian branches.
10. The Employees performed the following duties while working at the Company:
 - (a) selling to and purchasing from the public foreign currency;
 - (b) cashing travellers' cheques;
 - (c) transacting on behalf of the public instant money transfers using platforms such as Xpress Money;
 - (d) selling to the public travel money cards; and
 - (e) completing end of day reconciliation of cash and money transactions.
11. Based on their duties, Employee 1 and Employee 2 were entitled to be classified as Retail Employees Level 1 pursuant to the Retail Award for the duration of their employment.
12. Employee 3 was entitled to be classified as:

- (a) a Retail Employee Level 1 from the commencement of his employment to 15 April 2013; and
- (b) a Retail Employee Level 6 from 16 April 2013 to 23 July 2014, during which period his duties also included managing the day-to-day operations of the Company's branches and staff in South Australia.

Summary of contraventions

13. The FWO has determined, and the Company admits, that the Company contravened the following sections of the FW Act in regard to the Employees:

- (a) section 45 of the FW Act, by:
 - (i) failing to pay the minimum rates of pay in accordance with clause 17 of the Retail Award;
 - (ii) failing to pay the casual loading in accordance with clause 13.2 of the Retail Award;
 - (iii) failing to pay the evening work penalty rate in accordance with clause 29.4(a) of the Retail Award;
 - (iv) failing to pay the Saturday penalty rate in accordance with clause 29.4(b) of the Retail Award;
 - (v) failing to pay the Sunday penalty rate in accordance with clause 29.4(c) of the Retail Award;
 - (vi) failing to pay the Public Holiday penalty in accordance with clause 29.4(d) of the Retail Award;
 - (vii) failing to pay overtime penalty rates for permanent employees in accordance with clause 29.2 of the Retail Award; and
 - (viii) failing to engage Employee 1 for the minimum shift duration prescribed by clause 13.4 of the Retail Award.
- (b) section 44 of the FW Act, by:
 - (i) failing to pay Employee 2 and Employee 3 their base rates of pay on Public Holidays in accordance with section 116 of the FW Act;

- (ii) failing to pay Employee 2 and Employee 3 their base rate of pay and leave loading during a period of annual leave in accordance with section 90(1) of the FW Act;
 - (iii) failing to pay Employee 2 and Employee 3 their base rate of pay for periods of personal leave in accordance with section 99 of the FW Act;
 - (c) section 323(1)(a) of the FW Act by failing to pay in full amounts payable to the Employees in relation to the performance of work;
 - (d) section 325(1) of the FW Act, by unreasonably requiring the Employees to spend amounts payable to them for the performance of work; and
 - (e) section 536(2) of the FW Act by failing to include in payslips provided to Employees information prescribed by the *Fair Work Regulations 2009* (FW Regulations).
14. In December 2016 and March 2017, the Company made rectification payments to the Employees totalling \$100,253.90, as follows:
- (a) \$52,269.07 to Employee 1;
 - (b) \$26,665.55 to Employee 2; and
 - (c) \$21,319.28 to Employee 3.
15. The Company has provided evidence and assurances to the FWO that, as at the commencement of this Undertaking, the Company has:
- (a) ceased its practice of paying flat rates of pay (the practice of which resulted in the contraventions admitted at paragraphs 13(a) and 13(b) above;
 - (b) ceased its practice of requiring staff to make good any cash shortages (Reimbursement policy) (which practice resulted in the contraventions admitted at paragraphs 13(c) and 13(d) above); and
 - (c) commenced paying all employees covered by the Retail Award in accordance with the rates of pay, penalties and entitlements in accordance with the Retail Award.

Full Audit

16. Prior to signing of this Undertaking, the Company engaged an external auditor to perform an audit of the wages and entitlements of all award-covered current and former employees employed between 1 January 2011 to 30 June 2017 (the **Full Audit**) to identify historical instances of non-compliance with the FW Act and Retail Award and take corrective action. As a result of the Full Audit findings for the Company's current workforce of 97 award-covered employees, the Company has repaid:
- (a) 51 employees a total of \$328,949.35 in underpaid wages over the Full Audit period;
 - (b) 78 employees a total of \$78,379.84 in respect of cash shortage reimbursements over the Full Audit period; and
 - (c) the requisite amount of superannuation outstanding.

UNDERTAKINGS

17. Pursuant to section 715 of the FW Act, upon the commencement of this Undertaking, the Company undertakes to complete the actions set out in paragraphs 18 to 39 below.

Full Audit Back Payments

18. In respect of the Full Audit outlined in paragraph 16 above, the Company undertakes as follows:
- (a) Complete the audit of its 177 former employees and rectify all contraventions outlined in the Full Audit within 90 days of the commencement of this Undertaking;
 - (b) Write to all affected former employee(s) about their underpayment, outlining amounts owing relating to wages and cash shortage reimbursements;
 - (c) Provide evidence of payment to the FWO; and
 - (d) In the event that after making reasonable efforts, Company is unable to locate an employee to whom money is owed, the Company will make an application to the Commonwealth of Australia (through the FWO) pursuant to section 559 of the FW Act to pay money into the Consolidated Revenue Fund (CRF) after completion of the Full Audit. The Company will complete the required documents supplied by the FWO. (Any employees that have underpayments paid into the CRF can contact the FWO to claim the money).

Workplace relations compliance - systems and processes

19. The Company undertakes to comply at all times and in all respects with the FW Act, FW Regulations and the Retail Award.
20. Within 60 days of the commencement of this Undertaking, the Company undertakes to provide details to the FWO of the steps it has taken or proposes to take to comply with their obligations under the Retail Award and FW Act, including steps taken to:
 - (a) ensure each employee is paid the correct minimum rates of pay, penalty rates overtime and other entitlements in accordance with the Retail Award;
 - (b) issue payslips to each employee within one working day of payment containing all prescribed information;
 - (c) keep accurate and complete records as required by section 535 of the FW Act and Part 3-6, Division 3 of the FW Regulations;
 - (d) amend policies and procedures for reporting cash shortages that do not require the Company's employees to reimburse the company for such losses;
 - (e) amend contracts of employment to ensure they do not require employees to "make good" any cash shortages; and
 - (f) ensure that the Company and any outsourced payroll entities comply at all times and in all respects with the FW Act, FW Regulations and Retail Award.
21. Within 30 days of the Company providing the details outlined at paragraph 20 above, FWO may provide feedback on the steps taken or proposed. The Company will take all reasonable steps to incorporate such feedback into its systems and processes.

Apology

22. Within 14 days of the commencement of this Undertaking, the Company undertakes to:
 - (a) send a letter of apology to each of the Employees in the form prescribed in Attachment B; and
 - (b) provide a copy of each letter to the FWO.

Employee Assistance

23. With respect to former or current Company employees who are identified in the Full Audit as being owed monies in excess of \$20,000 in unpaid wages and entitlements, the

Company undertakes to:

- (a) provide these employees with reimbursement of up to \$500.00 (inclusive of GST) for accessing independent financial advice with a registered financial advisor of their own choosing;
 - (b) provide access to this reimbursement for 12 months from the date of commencement of this Undertaking, or from when the back payment is made to the relevant employee, whichever is later; and
 - (c) take reasonable steps to inform eligible employees of the entitlement to reimbursement.
24. For a period of 12 months after the commencement of this Undertaking, the Company undertakes to:
- (a) maintain adequate resources to receive and address telephone and email enquiries from current or former Company employees regarding their wages and entitlements;
 - (b) nominate a telephone number and create a designated email address for all current and former Company employees to make enquiries regarding their wages and entitlements; and
 - (c) include details of the telephone number and email address referred to above in the documents referred to in Attachments B, C and D.

FWO My Account registration

25. Within 28 days of the commencement of this Undertaking, the Company will:
- (a) register with the FWO My Account portal at www.fairwork.gov.au/register and create a My Account profile;
 - (b) provide the My Account Customer Registration Number (CRN) to the FWO;
 - (c) using the FWO Pay Calculator, calculate relevant minimum pay rates (including penalty rates where necessary) and save these calculations to Company's My Account profile;
 - (d) demonstrate to an officer of the FWO:
 - (i) that an officer or employee of the Company with responsibility for recruitment, human resources and/or payroll functions has the necessary skills and knowledge required to effectively use the My Account platform, including knowing how to save information to My Account from the FWO website and

- how to use relevant online tools on the FWO website; and
- (ii) how the Company will use this information to ensure compliance with workplace obligations including paying employees the correct minimum rates of pay.
- (e) subscribe to the FWO's "subscribe to email updates" service accessible from the FWO website and request information updates on the following topics:
- (i) pay rates and entitlements;
 - (ii) new products and resources;
 - (iii) about us and our work;
 - (iv) updates in my industry; and
 - (v) tailored information that's relevant to me.

Workplace relations training

26. Within 90 days of the commencement of this Undertaking, the Company undertakes to do the following, at its own expense:
- (a) organise and ensure that training is provided to all Company employees or officers who have responsibility for human resources, recruitment and/or payroll functions **(Training)**;
 - (b) ensure the Training relates to compliance with Commonwealth of Australia workplace laws and instruments, including responsibilities of employers under the FW Act and the Retail Award;
 - (c) ensure the Training is conducted by an accredited workplace trainer who has been approved by the FWO;
 - (d) provide the training materials to be used in the Training to the FWO no later than 14 days before the training is to be conducted;
 - (e) provide evidence of attendance at the Training (including the name and position of all attendees and the date on which the training was held) to the FWO within seven days of the Training being provided; and
 - (f) for a period of three years from the commencement of this Undertaking, ensure that training is conducted in the manner prescribed in paragraphs 6(a) to (c) within 90 days of any new or existing employees or officers who, after the commencement of this Undertaking, acquire responsibilities that include human resources, recruitment or payroll functions on behalf of the Company.

Co-operation with FWO in its future enquiries

27. The Company undertakes to co-operate with the FWO in its future enquiries or investigations relating to Requests for Assistance from current or former Company employees, including by:
- (a) responding to any correspondence from the FWO within a reasonable timeframe;
 - (b) responding to requests from the FWO to participate in records of interview or to provide information within a reasonable timeframe; and
 - (c) responding to any other reasonable requests from the FWO in relation to its investigations within a reasonable timeframe.

Public Notice

28. The Company undertakes to:
- (a) within 28 days of, but not prior to, the FWO publishing a Media Release on its website in respect of this Undertaking, place a public notice (**Public Notice**) in the weekend edition of the Australian Financial Review (*AFR Weekend*) in the form of Attachment C. The Public Notice must:
 - (i) bear the name and logo of the Company;
 - (ii) appear within the first 5 pages of the newspaper;
 - (iii) be at least 15 cm x 20 cm in size; and
 - (iv) be in the form of Attachment C.
 - (b) within seven days of publication of the Public Notice, provide a copy of the Public Notice to the FWO.

Social Media Notice

29. The Company undertakes to:
- (a) within 28 days of, but not prior to, the FWO publishing a Media Release on its website about the Undertaking, place a post on the Company Facebook Page at <https://www.facebook.com/UAEExchange.Australia/> which will:
 - (i) be posted and pinned to the top of the homepage in public view;
 - (ii) remain on the Company Facebook page for a continuous period of at least 28 days;

- (iii) contain an html link to the executed Undertaking; and
 - (iv) be in the form prescribed at Attachment D.
- (b) within seven days of posting, provide a screenshot of the Facebook Post to the FWO.

Company website homepage

30. The Company undertakes to:
- (a) within 28 days of the commencement of this Undertaking, post a notice on the homepage of the Company website <https://www.uaeexchange.com/aus/> which will:
 - (i) be in the form of Attachment D;
 - (ii) be displayed in at least size 10 font; and
 - (iii) remain on the website for a period of 28 continuous days; and
 - (b) within seven days of posting, provide a screenshot of the notice to the FWO.

Workplace Notices

31. Within 28 days of the commencement of this Undertaking, the Company will display a notice in each branch in Australia controlled by the Company (**Workplace Notice**). The Workplace Notice will:
- (a) be printed in at least A3 size;
 - (b) be clearly displayed in a location to which all employees who work at all Company branches Australia wide have access;
 - (c) be displayed for a period of 28 continuous days; and
 - (d) be in the form prescribed in Attachment C.
32. At the end of the period of 28 days, the Company will provide written confirmation to the FWO that the Workplace Notice has been continuously displayed for the required period, including photographic evidence of display in at least one branch in each State and Territory.

Future Audits

33. The Company undertakes to engage an external professional with qualifications in accounting or workplace relations or an external professional otherwise approved by the FWO, to perform annual audits of Company's compliance with Commonwealth

workplace laws and instruments (**Annual Audits**). The Annual Audits will:

- (a) assess a sample of at least 20% of the Company's workforce across different work locations, classifications and types or categories of work;
 - (b) be conducted for all full pay periods where part of the period falls within the following dates:
 - (i) 1 February 2019 – 28 February 2019 - to be finalised by 30 April 2019;
 - (ii) 1 September 2019 – 31 September 2019 - to be finalised by 31 November 2019; and
 - (iii) 1 September 2020 – 31 September 2020 - to be finalised by 31 November 2020.
 - (c) assess the Company's compliance with:
 - (i) wages or work-related entitlements under any applicable industrial instruments, including the Retail Award, and the National Employment Standards;
 - (ii) obligations under section 323 of the FW Act; and
 - (iii) record keeping and pay slip obligations listed within Division 3 of Part 3-6 of the FW Act and within the FW Regulations.
34. Within 30 days of each of the finalisation dates specified above in paragraph 33(b), the Company will provide a copy of the Audit report to the FWO, which will include:
- (a) a statement about the methodology used to conduct the Audit; and
 - (b) details of any contraventions identified in the Audit.
35. If requested by the FWO, the Company will provide the FWO with any records or documents used to conduct the Audit, including any working documents, within 14 days of such a request.
36. Within 30 days of the completion of the Annual Audit, the Company will:
- (a) rectify any underpayments arising from contraventions identified;
 - (b) provide to the FWO evidence of such rectification;
 - (c) in the event that after making reasonable efforts, the Company is unable to locate any employee(s) to whom money is owed, the Company will make an application to the Commonwealth of Australia (through the FWO) in accordance with section 559 of the FW Act to pay the money into the CRF. (Any employees that have

underpayments paid into the CRF can contact the FWO to claim the money).

Broader Community Workplace Relations Education

37. Within 60 days of the commencement of this Undertaking, the Company undertakes to make the following donations with the objective of assisting the promotion of compliance with Commonwealth workplace laws in the community:
- (a) \$10,000.00 to Caxton Legal Centre (ABN 57 035 448 677), of 1 Manning Street South Brisbane QLD 4101;
 - (b) \$10,000.00 to Australian Migrant Resource Centre (ABN 42 131 904 410) of 23 Coglein Street Adelaide SA 5000;
 - (c) \$10,000.00 to Council of International Students Australia (ABN 90 987 791 158);
 - (d) \$10, 000.00 to South West Sydney Legal Centre (ABN 91 991 317 875) of 98-100 Moore Street, Liverpool NSW 2170; and
 - (e) \$10, 000.00 to Gold Coast Community Legal Centre & Advice Bureau Inc (ABN 29 559 147 600) of 34 Railway Street Southport QLD 4123
38. The Company undertakes to provide evidence of each donation to FWO within 7 days of making said donation.

No Inconsistent Statements

39. The Company:
- (a) must not; and
 - (b) must ensure that each of its officers, employees or agents do not,
- make any statement, orally or in writing or otherwise imply anything that is inconsistent with admission or acknowledgements contained in this Undertaking.

ACKNOWLEDGEMENTS

40. The Company acknowledges that:
- (a) the FWO may:
 - (i) make this Undertaking (and any of the Attachments hereto) available for public inspection, including by posting it on the FWO internet site at www.fairwork.gov.au;
 - (ii) release a copy of this Undertaking (and any of the Attachments hereto) pursuant to any relevant request under the *Freedom of Information Act 1982*

(Cth);

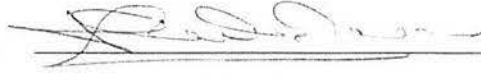
- (iii) issue a media release in relation to this Undertaking;
 - (iv) from time to time, publicly refer to the Undertaking (and any of the Attachments hereto) and its terms; and
 - (v) rely upon the admissions made by the Company set out in paragraph 13 above in respect of any decision in respect of enforcement action to be against the Company in the event that the Company is found to have failed to comply with its workplace relations obligations in the future.
- (b) consistent with the Note to section 715(4) of the FW Act, this Undertaking in no way derogates from the rights and remedies available to any other person arising from the conduct set out herein;
- (c) consistent with section 715(3) of the FW Act, the Company may withdraw from or vary this Undertaking at any time, but only with the consent of the FWO; and
- (d) if the Company contravenes any of the terms of this Undertaking:
- (i) the FWO may apply to any of the Courts set out in section 715(6) of the FW Act for orders under section 715(7) of the FW Act; and
 - (ii) this Undertaking may be provided to the Court as evidence of the admissions made by the Company in paragraph 13 above, and also in respect of the question of costs.

Executed as an undertaking

EXECUTED by UAE Exchange Australia Pty Ltd in accordance with section 127(1) of the Corporations Act 2001:



(Signature of director)



(Signature of director/company secretary)

SUBHASCHANDRA SHETTY

RITESH SINGH

(Name of director)



(Name of director/company secretary)

27/6/18

(Date)

in the presence of:

27/06/2018

(Date)

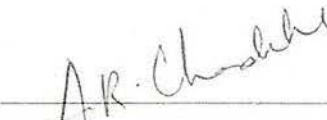
in the presence of:



(Signature of witness)

A.R. CHANDRIKA

(Name of witness)



(Signature of witness)

A.R. CHANDRIKA

(Name of witness)

ACCEPTED by the FAIR WORK OMBUDSMAN pursuant to section 715(2) of the *Fair Work Act 2009* on:



29 JUNE 2018

MICHAEL CAMPBELL
[Insert name and role of Delegate]
DEPUTY FAIRWORK OMBUDSMAN
Delegate for the FAIR WORK
OMBUDSMAN

(Date)

in the presence of:



LOUISE CATO

(Signature of witness)

(Name of Witness)

ATTACHMENT A – Request for Assistance Employees

Reference	Name
Employee 1	[REDACTED]
Employee 2	[REDACTED]
Employee 3	[REDACTED]

✓

ATTACHMENT B – FORM OF APOLOGY LETTER TO RFA EMPLOYEES

<Date>

<Employee Name>

<Employee Address>

Dear <Employee Name>

I am writing to apologise on behalf of UAE Exchange Australia Pty Ltd (the Company) for non-compliance with Commonwealth Workplace relations laws. An investigation conducted by the Office of the Fair Work Ombudsman (FWO) determined that the Company contravened the *Fair Work Act 2009* and *General Retail Industry Award 2010* by:

- Underpaying your base rates of pay.
- Underpaying you applicable penalties such as evening work, Saturdays, Sundays, Public Holidays and overtime.
- Unlawfully requiring you to 'make good' cash shortages.

The Company has formally admitted to the FWO that it did not comply with its obligations under Commonwealth workplace relations laws and have entered into an Enforceable Undertaking with the FWO, a copy of which will be available from the FWO website at www.fairwork.gov.au.

The Company expresses its sincere regret and apologises to you for failing to comply with its lawful obligations.

As part of the Enforceable Undertaking, we have committed to a number of measures to ensure future compliance with Commonwealth workplace relations laws.

The Company has taken steps to remedy the similar conduct in relation to all other employees in the period from 1 January 2011 to 30 June 2017, including ceasing the practice of requiring staff to 'make good' cash shortages. In this regard, on [date] you were back paid \$[insert amount] and reimbursed \$[insert amount relating to cash shortages].

Should you have any questions, please contact us at

[REDACTED] or on [REDACTED]

Yours sincerely

[Director(s) Name]

ATTACHMENT C – FORM OF PUBLIC AND WORKPLACE NOTICES

Contraventions of Fair Work Act by U A E Exchange Australia Pty Ltd

We refer to the investigation conducted by the Office of the Fair Work Ombudsman (FWO) into allegations that UAE Exchange Australia Pty Ltd (the Company) contravened the *Fair Work Act 2009* and *General Retail Industry Award 2010* by:

- Underpaying employees in respect of their base rates of pay.
- Underpaying employees in respect of applicable penalties such as evening work, Saturdays, Sundays, Public Holidays and overtime.
- Unlawfully requiring employees to 'make good' cash shortages.

The Company has formally admitted to FWO that these contraventions occurred and has entered into an Enforceable Undertaking (EU) with the FWO (available at www.fairwork.gov.au) committing to a number of measures to remedy the contraventions, rectify workplace practices and ensure future compliance. The Company's undertakings include:

- completing a full audit (the Full Audit) of entitlements paid to its award-covered current and former employees employed within the period 1 January 2011 to 30 June 2017 and back paying any under-paid staff. The Company has already completed the Full Audit for its current employees and rectified underpayments for those employees. Any former employees identified by the Full Audit as having been underpaid will be contacted by the Company;
- ceasing the practice of requiring staff to make good any cash shortages and reimbursing all staff affected by the practice in the period 1 January 2011 to 30 June 2017; and
- making donations to organisations including Caxton Legal Centre, Australian Migrant Resource Centre, Council of International Students Australia, South West Sydney Legal Centre and Gold Coast Community Legal Centre and Advice Bureau Inc to fund education about workplace rights.

If the amount back paid to an employee exceeds the sum of \$20,000, the Company will provide reimbursement for financial advice up to the value of \$500 (upon provision of receipts or invoices from a registered financial advisor within 12 months of the commencement of the

EU).

The Company expresses its sincere regret and apologises for the contraventions. Furthermore, the Company gives a commitment that such conduct will not occur again and that it will comply with all requirements of the Commonwealth workplace relations laws in the future.

If you worked for the Company during the period 1 January 2011 to 30 June 2017 or and have queries or questions relating to your employment entitlements, please contact the Company at [REDACTED] or on [REDACTED]. Alternatively, if you have questions regarding your conditions of employment, please contact the FWO via the website at www.fairwork.gov.au or call the Infoline on 13 13 94.

ATTACHMENT D – FORM OF FACEBOOK & WEBSITE POST

UAE Exchange Australia Pty Ltd (the Company) is guided by its core values of integrity, commitment, empowerment and care, to conduct its business to the highest standards. In doing so, the Company acts in an open, pioneering and collaborative manner to advance the best interests of its customers and employees.

Pursuant to an investigation conducted by the Fair Work Ombudsman (FWO) into our wage practices, regrettably it has been found that we have underpaid three former employees at QLD and SA branches a total of \$100,253.90 between September 2010 and October 2015.

Though we make every effort to ensure that we comply with Australian workplace relations laws, the Company expresses sincere regret and apologises for these contraventions. The Company, in committing to a number of measures to remedy the contraventions (including the rectification of underpayments) and ensure these issues will not occur again, has entered into an Enforceable Undertaking with the FWO. You can view a copy of the Enforceable Undertaking here: <LINK TO MEDIA RELEASE>.

We would like to thank FWO for helping us to identify the contraventions.

If you worked for the Company and have queries or questions relating to your employment, please contact the Company at [REDACTED] or on [REDACTED]
[REDACTED]