



GBST | Financial Services
Technology

Modern Slavery Policy

GBST Holdings Limited

ABN: 85 010 488 874

1. Background

Modern slavery is a term which covers a range of exploitative practices including human trafficking, sexual exploitation, forced labor, forced criminality, domestic servitude, child exploitation and forced organ removal.

The Company is committed to limiting the risk of modern slavery within its own business, within its supply chains or through any other business relationship.

2. Definitions

Associated Entities has the meaning given to that term by section 50AAA of the Corporations Act and includes any international entities.

Company means GBST Holdings Limited ACN 010 488 874 and/or any of its Associated Entities.

Contractors means all contractors, secondees and consultants of or to the Company (whether paid or unpaid).

Director means a director of GBST Holdings Limited.

Employee means an employee of the Company.

Policy means this document or any amendment or replacement document.

Supplier means a person who supplies goods and services to the Company (whether paid or unpaid) and any employees of the Supplier.

3. Policy Application

3.1 This Policy applies to all persons working for or on behalf of, or providing services to, the Company in any capacity, including all Suppliers, Employees, Directors, officers, agency workers, Contractors, consultants and any other third-party representatives.

3.2 The Company expects that all who have, or seek, a relationship with the Company to familiarise themselves with this Policy and to act in a way that is consistent with its values.

3.3 The Company will only do business with Suppliers who fully comply with this Policy, or those who are taking verifiable steps towards compliance.

4. The Company's response to Modern Slavery

4.1 All employment with the Company is voluntary.

4.2 The Company does not use or condone, child or forced labour in any of its operations or premises and works to ensure these practices are not present in its workforce or supply chain.

- 4.3 The Company does not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude.
- 4.4 The Company abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- 4.5 Where the Company is made aware of modern slavery practices in its own business or within its supply chain, the Company will investigate all claims and if valid, resolve the issue in line with the values expressed in this Policy.
- 4.6 The Company provides training with the aim of educating all Employees and Contractors on signs that could indicate modern slavery, due diligence practices for engaging Suppliers, auditing existing Suppliers and what action an Employee or Contractor can take if they have a concern in relation to modern slavery.
- 4.7 The Company conducts risk assessments to determine which parts of the business and supply chains are most at risk from modern slavery to ensure focus on those areas.
- 4.8 This Policy will be used to underpin and inform any statement on modern slavery that the Company is required to produce as a result of legislative requirements in any country in which the Company operates.

5 The Company's Supply Chain

- 5.1 The Company expects its Suppliers to have similar values to the Company in relation to modern slavery.
- 5.2 The Company engages with Suppliers to promote and support anti-slavery practices throughout the Company's supply chain.
- 5.3 The Company is committed to introducing anti-slavery obligations in all Supplier contracts. As part of their contractual obligations, Suppliers will agree to undertake a process so the Company can gauge the Supplier's ongoing commitment to eradicating modern slavery within its own business and those of its own suppliers.

6 Non-compliance with this Policy

- 6.1 Any breach of this Policy will be taken seriously and dealt with on a case by case basis.
- 6.2 A breach of this Policy by an Employee may lead to disciplinary action being taken in accordance with the Company's disciplinary process. Serious

breaches may be regarded as gross misconduct and may lead to immediate dismissal further to the Company's disciplinary procedure.

- 6.2 A breach of this Policy by a Supplier will also be dealt with on a case by case basis. Depending on the behaviour, the Company may choose to adopt a zero-tolerance stance towards the Supplier's behaviour and look at methods of preventing further engagement with the Supplier, or may decide to work with the Supplier so they become compliant with this Policy.

Authorisation	Board of Directors	Date: 24 May 2019
History	May 2019: version 1	