

Modern Slavery Act Statement

Introduction

This modern slavery statement is made by ACP Grosvenor Street Group Pty Ltd ACN 642 668 915 on its own behalf and on behalf of its subsidiaries ("GBST") and has been prepared with reference to the requirements in the *Modern Slavery Act 2018* (Cth) and the *Modern Slavery Act 2015* (UK) (the "Acts") for the reporting period of 1 July 2021 to 30 June 2022 ("Reporting Period").

While GBST is not considered a "reporting entity" under the Acts because GBST does not meet the relevant financial thresholds set out in those Acts for the Reporting Period, GBST continues to be committed to addressing the risk of modern slavery¹ in GBST's business operations and supply chains so GBST has decided to publish its modern slavery statement on a voluntary basis. However, given GBST is not a "reporting entity", this modern slavery statement has not been submitted to or approved by any government body, or published on any government register.

The purpose of this voluntary statement is to outline GBST's approach to addressing the risk of modern slavery in GBST's operations and supply chain.

GBST Structure, Operations and Supply Chains

GBST provides global technology and digital solutions for financial services organisations. During the Reporting Period, a material corporate transaction resulted in a change in the ownership and business structure of GBST such that, as at the end of the Reporting Period, GBST operated in Australia, the United Kingdom and Vietnam and had 257 employees.

GBST's main operations relate to licensing its software products and services, and providing implementation services, customisationservices, managed services, support services and consultancy services to its clients. GBST's internal corporate functions include sales, marketing, human resources, finance and legal.

GBST's supply chain is mostly focused on: (a) the procurement of technology for GBST clients (software, hosting and cloud services); (b) embedding or using such technology in conjunction with GBST's products and services; (c) using the procured technology to assist GBST in providing its products and services to GBST clients; (d) procuring software development services from offshore and (e) procuring goods and services to support GBST's internal corporate functions and operational requirements.

Risk Identification, Management and Due Diligence

As a software and services provider, GBST's suppliers are predominantly software suppliers, cloud infrastructure providers, banking services and professional consultants including finance, legal, and marketing firms. GBST has assessed the risk of modern slavery within its operations and key supply chains and considers the risk to be low. Nonetheless, GBST continues to have measures in place to identify, assess, monitor and manage modern slavery risk areas.

¹ In this statement, references to 'modern slavery' include trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

Modern Slavery Policy

GBST is committed to ensuring that there is no slavery or human trafficking in any part of its business. GBST has a Modern Slavery Policy, which reflects GBST's commitment to ensure that slavery and human trafficking does not take place anywhere within its operations or supply chains. The Modern Slavery Policy is used to ensure that staff are aware of their obligations in relation to modern slavery and how GBST seeks to address modern slavery in its operations and supply chain.

Suppliers

GBST has continued to review the potential risk of modern slavery practices across its supply chain taking into consideration factors such as location, industry and product/service.

During the Reporting Period, GBST continued to focus on ensuring that any supplier agreements that were introduced, renewed or amended: (a) included GBST's standard modern slavery clauses; or (b) the Supplier satisfied GBST's modern slavery due diligence processes; or (c) the Supplier satisfied GBST's modern slavery questionnaire (collectively, "GBST's Modern Slavery Supplier Standard").

GBST's supply chain continues to be the main area of focus in addressing modern slavery risk and GBST has implemented a process with relevant tools so that, prior to any engagement or continued engagement with a supplier, GBST's staff can confirm that GBST's Modern Slavery Supplier Standard has been met. GBST has also refused to engage with certain suppliers that do not meet its Modern Slavery Supplier Standard during the Reporting Period.

Whistleblowing Policy

GBST's Whistleblowing Policy allows and encourages employees and contractors to raise concerns regarding modern slavery and human trafficking in a confidential manner using procedures outlined in the Whistleblowing Policy. GBST is committed to creating and ensuring a non-discriminatory and respectful working environment for its employees. GBST wants all its employees to feel confident that they can expose wrongdoing without any risk to themselves. During the Reporting Period, there were no reports made in relation to modern slavery concerns.

Training

GBST continues to deliver a dedicated modern slavery training course to all employees. GBST's Modern Slavery Policy and Whistleblowing Policy are made available to all employees on the GBST intranet.

Recruitment

GBST uses reputable recruitment partners across the globe when sourcing employees and contractors and recruitment agreements either contain GBST's standard modern slavery clauses or a due diligence process has been undertaken so GBST's staff can confirm that the recruitment partner meets GBST's Modern Slavery Supplier Standard.

Risk Management

GBST's Executive Team has group-wide responsibilities and ultimately has common general oversight across GBST. Senior managers and team leads across the different functions of GBST are accountable for identifying, assessing and addressing modern slavery risk across our operations due to the fact that different types of suppliers in GBST's supply chain require assessment by different areas of GBST's operations.

Assessment of the Effectiveness of Actions

During the Reporting Period, GBST continued to focus on determining what modern slavery risks may exist within GBST's operations and its supply chains. GBST remains of the view that its direct operations have a low risk of modern slavery, and that risk primarily exists within GBST's supply chains. To assess the effectiveness of GBST's actions in respect of its supply chain, GBST considered the Modern Slavery Supplier Standard and related procurement process with a view to identifying potential refinements that could be adopted. However, continuing COVID-19 pandemic restrictions as well as the material changes to GBST's ownership and business structure during the Reporting Period impacted these activities so GBST will review its modern slavery related program in the next reporting period to identify how GBST can improve and evolve in response to changing circumstances and the evolution of GBST's business.

Process of Consultation with Group Entities

GBST has a common governance framework across the group and the same Executive Team has contributed to GBST's modern slavery-related program, including this statement.

This Statement was approved by the Board of ACP Grosvenor Street Group Pty Ltd ACN 642 668 915 as the principal governing body of GBST on 15 December 2022.

Signed for and on behalf of the Board on 15 December 2022



Robert DeDominicis

Director and Chief Executive Officer

ACP Grosvenor Street Group Pty Ltd ACN 642 668 915