Pacific Group Topco Modern Slavery Statement

For the FY25 Reporting Period

Index

Acknowledgement of Country

We would like to begin our Modern Slavery Statement by acknowledging the Traditional Custodians of the land on which our offices are located – the peoples and nations listed below – and we would also like to pay our respects to Elders past and present.

Brisbane	Melbourne	Canberra
Turrbal & Yuggera Peoples	Wurundjeri People	Ngunnawal People

Adelaide	Perth	Sydney
Kaurna People	Whadjuk People	Gadigal People

About this statement

This Modern Slavery Statement is made in accordance with section 14 of the Modern Slavery Act 2018 (Cth) (**MSA**). This is our fifth statement made under the MSA. Our Statement also complies with the UK Modern Slavery Act 2015.

It is a joint statement made on behalf of Pacific Group Topco Pty Ltd (the group's ultimate holding company), and its subsidiaries in the Magentus and Citadel Edge groups.

✦ Magentus

◈ CitadelEdge

Kapish
a Citadel Edge company

During FY25, the transformation of our group into two distinct operational parts was materially completed, and in the period between that reorganisation and the preparation and approval of this Statement, we completed the rebranding of the non-Health half of the business. We have therefore elected to present our Statement using a blend of the branding, which we believe provides our stakeholders with clarity and transparency concerning our operations.

Summary

Pacific Topco Modern Slavery Summary

We said we would do the following in FY25. How did we do?

	FY25 Target	Status	Priority for FY26
Process Improvement	Further engagement with SEDEX clients and use feedback to improve management controls.	✔ Complete	Complete documentation to demonstrate our ambitions
Further data sharing	Citadel Group to join SEDEX platform	Paused	As a result of our restructure within Citadel Edge, we are evaluating the best way to report.
Further direct engagement with high-risk suppliers	Further positive engagement with our Tier 1 high-risk suppliers.	✔ Complete	Engagement with these vendors on controls and reporting.

Who We Are

Pacific Topco Group

Pacific Group Topco Pty Ltd (**Pacific Topco**) is a holding company for two distinct businesses:

- Magentus; and

- Citadel Edge.

Since March 2025, each business unit has operated separately with operational responsibility for Magentus falling to the Magentus CEO, and Citadel Edge to our Founder and Executive Chairman. Both the Magentus CEO and the Executive Chairman are Directors of Pacific Topco.

To reflect these changes, we have updated the Statement structure, although the supply chains, and risks remain materially unchanged.

Key changes from our last Statement are:

- separation of the Shared Services function into two units; and

- rearrangement of the Magentus operating structure to reflect a revised 'Chapter & Tribe" model.

Each business has its own section within this Statement.

Melbourne, Australia
Headquarters

756
Employees in Australia, the United Kingdom, New Zealand and Malaysia

> $220,000,000
Revenue

Pacific Topco Group Structure and Operations

Statement Scope

This Statement is made on behalf of the group's ultimate holding company - Pacific Group Topco Pty Ltd, and its subsidiary companies set out in Appendix 1. In this Statement we refer collectively to all the group companies as 'Pacific Topco', or the 'Group'.

This Statement is made for the period 1 July 2024 to 30 June 2025.

Group Operational Structure

- As described earlier in this Statement, Pacific Topco has two operational units. An overview of each is set out below.

Magentus

Magentus' operations are organised in business units and chapters.

- Clinical Diagnostics operates in two geographies - EMEA and APAC. Practice Management and Oncology operates in Australia. Under their respective leaders, these teams are responsible for sales, customer service, delivery and implementation of our world-class health information management systems to customers globally.
- Magentus' Product and Technology teams support every product in the Magentus portfolio. Led by the Chief Product Officer and the Chief Technology Officer, these teams keep our products aligned with best practice and customer expectations, using the most appropriate technology for the task.
- Finally, the Support Services function delivers legal, financial, security, administrative and human resources support to the Magentus companies.

Citadel Edge

Citadel Edge's operations are organised by capability and industries, but operate through three key divisions: Enterprise Solutions, Defence and National Security Solutions, and Audio-Visual Collaboration. These divisions are supported by our shared Services team which includes IT, legal, financial, security, administrative and human resources support.

Details of the operations of each of these divisions can be found in Section 3 of this Statement.

Pacific Topco Group Structure and Operations

Pacific Topco has two business units under three brands, each with allocated support services

Magentus

- Anaesthetic Private Practice™
- Data Management Services
- Evolution vLab®
- Charm Evolution®
- Cris®
- Evolution vRis®
- Evolution vLab®
- Euroking®
- eQstats®
- eConsent™
- Gentu®
- Genie®

CitadelEdge

- Defence and National Security Systems
- Cyber Assurance
- Business Transformation Management
- Information Management & Governance
- Audiovisual Collaboration
- Enterprise Software
- Data Management
- Workforce

Kapish

- Kapish® Content Manager Cloud
- K365 Cloud
- Kapish® Productivity Suite

Support Services

- Finance
- Enterprise IT
- People & Culture
- Legal, Risk & Compliance
- Security Operations

Operational and Procurement Details

Magentus

Magentus' objective is to deliver better healthcare outcomes through world-class technology. Magentus' operations are primarily directed toward the development, implementation and support of health information management software for use in public and private healthcare settings. In APAC, it delivers its software through teams based around its Brisbane, Melbourne, Sydney and Canberra offices. In EMEA, the team is based out of offices in London, Manchester, and Mansfield, with a strong hybrid workforce component. There are approximately 122 employees in the Clinical Diagnostics team, 101 in the Practice Management and Oncology team, 156 in Product, 85 in Technology and 54 in the Support team.

The vast majority of Magentus' team are permanent employees contracted directly by local Magentus entities on agreements that comply with all local laws. The software and IT industry is highly-competitive, and our employees are remunerated accordingly. Magentus is committed to being an employer of choice, and award-compliant salary makes up only a part of our comprehensive employee value proposition under the MyMagentus program.

In addition to its direct workforce, Magentus utilises third-party software developers located in Australia, but with reach-back to related party operations in India, Vietnam and the Philippines. We have carefully vetted these organisations prior to contracting and our agreements include appropriate clauses to safeguard against the risks of modern slavery.

Magentus' procurement is managed by the EMEA and APAC teams, with some shared elements between geographies in key areas such as cloud computing.

Magentus Pty Ltd is the main contracting company for Magentus APAC operations. Magentus Software Limited is the main contracting entity for Magentus EMEA.

Supply Chain and Procurement

- Operationally, Magentus is responsible for its own supply chain activities. In respect of goods and services sold, this involves acquiring:
  - computer hardware from local vendors for installation at customer premises;
  - telecommunications services from telecommunications service providers;
  - private cloud data centre services;
  - physical security services from local companies;
  - cloud storage services from US parent vendors with local operations;
  - software development services and software consultancy services from local and overseas companies;
  - operational support services from local Australian and international vendors; and
  - migration support services from a vendor in the Philippines.
- Magentus EMEA also acquires the Evolution vLab® product and related support from Magentus APAC in Australia.
- In respect of other activities, Magentus procures:
  - employee education services;
  - marketing services (conferences etc);
  - travel and accommodation services (travel agent, flights, car hire and hotels); and
  - contracts with specialist service providers, such as sms message services, helpdesk software and development software licences;
  - leasing and cleaning services for its offices; and
  - computer hardware from Australian vendors for internal use.

Material supplier categories are cloud hosting, SaaS licences, software and professional services.

Magentus Shared Services

Shared Services Operations

Shared Services describes the corporate functions that support the Magentus business. This includes people & culture, finance, legal, audit, risk and compliance, security operations, property management, and corporate IT.

All of Magentus and Citadel Edge's employees and direct contractors are employed through Magentus Group Services Pty Ltd.

Shared Services Supply Chain and Procurement

- Magentus' Shared Services division is responsible for procurement on its own behalf and the Magentus entities. Approximately 54 people work in Magentus Shared Services. This involves the following typical acquisitions:

  - employee benefits;
  - recruitment services;
  - marketing services (corporate website) and corporate functions;
  - travel and accommodation services (travel agent, flights, car hire and hotels);
  - postal and courier services;
  - archiving and secure document destruction;
  - computer hardware (laptops, desktops, mobile devices, printer/copier leases);
  - tea, coffee, catering, (including vending machines); and
  - office supplies.

Shared Services' top four procurement categories are (1) software/platform-as a service'; (2) rent and outgoings on leased premises; (3) professional IT services; (4) other professional services (legal, audit, cyber security and other consulting).

These services are predominantly obtained through Australia-based suppliers, though in the case of certain goods, countries of manufacturing origin may include China, Malaysia and Vietnam.

CitadelEdge

Enterprise Solutions (together with Kapish) is the group's professional services and software arm

Enterprise Solutions provides specialist software development, IT consulting, cloud computing, data management , cyber assurance and AI services.

Citadel Edge Solutions Pty Ltd is an expert software development house, focusing on complex bespoke projects. Its team specialises in developing and supporting cloud-hosted software. Citadel Edge Solutions' supply chain is stable, with 90% of its direct procurement spend with four vendors, of which one is an international cloud service provider's Australian subsidiary.

Approximately 69 members of the Enterprise Solutions team (including Kapish) operate from Melbourne, Sydney, Brisbane and Canberra. They are all remunerated above minimum requirements, and in accordance with all applicable employment laws and awards.

Enterprise Solutions Supply Chain and Procurement

Operationally, Enterprise Solutions is responsible for its own supply chain. This involves the following typical acquisitions:

- software for resale;
- software components;
- Cloud computing and storage services;
- graphic design services;
- contract professional services from Australian and overseas contractors; and
- uniform and promotional materials.

Professional Services also procures travel and accommodation services (travel agent, flights, car hire and hotels), and uses Citadel Edge Shared Services.

Kapish

Kapish Operations

Kapish is a leading software and IT services provider specialising in secure information management, and forms part of the Enterprise Solutions business. It is part of Enterprise Solutions, but presently continues to oeprate under the Kapish name.

Kapish trades through Kapish Services Pty Ltd and Kapish EA Pty Ltd. Kapish EA Pty Ltd is also established in New Zealand.

Kapish Services develops and maintains its own software that operates either independently, or as part of other software packages. A good example of Kapish's proprietary software is the Kapish® Productivity Suite which provides productivity enhancements to a third-party product, Open Text's Content Manager (**Content Manager**). Support and maintenance is also provided for its own and third-party licensed products. Kapish is a Platinum Partner of Open Text.

Kapish Services also operates Kapish® Content Manager Cloud, a market-leading secure cloud platform for Open Text Content Manager. Kapish can deliver Content Manager Cloud in several combinations to suit the customer's needs, but common services include establishing the cloud instance, setup or migration of Content Manager to the Cloud, as well as Content Manager training.

Kapish EA is a specialist part of Kapish and is the foremost reseller of the SAP LeanIX enterprise architecture product in the Asia Pacific region. Kapish EA also implements APLAS, SAP Signavio and Apptio products.

The Kapish team members are split across the Melbourne, Sydney and Brisbane offices. In common with their colleagues in the other divisions, they are rewarded and paid in accordance with all applicable employment laws and awards.

Kapish Supply Chain and Procurement

- Operationally, Kapish is responsible for its own supply chain. This involves the following typical acquisitions:
  - software for resale;
  - software components;
  - graphic design services;
  - contract professional services; and
  - uniform and promotional materials.

Kapish also procures travel and accommodation services (travel agent, flights, car hire and hotels), and uses Citadel Edge Shared Services.

Kapish Services has a small and stable procurement base, with >85% of its spend with two key software vendors. In line with other divisions, Kapish's cloud services are acquired under the management of Citadel Edge from US vendors or their local subsidiaries, using services located in Australia. Software is primarily licensed from the US and Europe. No physical installable products are shipped by suppliers to Kapish, or by Kapish to its customers.

Defence and National Security Solutions

DNSS Operations

DNSS operates from our Canberra and Melbourne Offices, with a presence in Kuala Lumpur, Malaysia.

It encompasses our Workforce Solutions as well as our edge and core digital transformation teams, tactical and connected systems engineering, our cyber and applied intelligence operations.

DNSS and Workforce are primarily a service-based operation, but do procure, configure and install hardware from defence manufacturers as required by its clients.

DNSS Supply Chain and Procurement

Operationally, DNSS is responsible for its own supply chain. This involves the following typical acquisitions:

- software for resale;
- software components;
- cloud computing and storage services;
- graphic design services;
- contract professional services from Australian contractors; and
- uniform and promotional materials.

Professional Services also procures travel and accommodation services (travel agent, flights, car hire and hotels), and uses Citadel Edge Shared Services.

Citadel Edge Technology Solutions

Citadel Tech Operations

Citadel Tech's key business operations are the design, supply, installation, maintenance and servicing of audio visual and video collaboration technologies across its key verticals of higher education, defence, health, and government.

Approximately 83 people work in Citadel Tech's operations, with the greatest number working from the division's Melbourne office and warehouse, with other operations from its Adelaide, Canberra and Matraville warehouses. All Citadel Tech employees are retained on contracts compliant with Australian law and are remunerated in accordance with applicable awards.

Citadel Tech Supply Chain and Procurement

Citadel Tech's key trading entity is Citadel Edge Technology Solutions Pty Ltd. Operationally, Citadel Tech is responsible for its own supply chain activities. In respect of goods and services sold, this involves acquiring:

- software licensing for video and audio conferencing;
- audio-visual hardware (screens, projectors, speakers, microphones, computing hardware, switchgear etc), from local suppliers, sourced from major global manufacturers;
- cabling, connectors, brackets & other ancillary hardware required for audio-visual equipment;
- vehicles for delivery of goods and transport of technicians;
- qualified trades people for project or longer-term engagements;
- warehousing and storage services; and
- uniforms and promotional materials.

Citadel Tech also procures travel and accommodation services (travel agent, flights, car hire and hotels), and uses Citadel Edge Shared Services.

Citadel Tech has a stable supply chain, with less than ten AV hardware suppliers making up around 60% of its procurement spend. All these vendors are either Australian subsidiaries of major electronics manufacturers (most of whom have detailed Modern Slavery disclosures and some of whom are subject to NGO reporting), or their authorised Australian distributors.

Citadel Edge Shared Services

Shared Services Operations

Shared Services describes the corporate functions that support the Citadel Edge business. This includes people & culture, finance, legal, risk and compliance, security operations, property management, and corporate IT.

Shared Services Supply Chain and Procurement

Citadel Edge Shared Services is responsible for procurement on its own behalf and the Citadel Edge entities. Approximately 28 people work in Magentus Shared Services. This involves the following typical acquisitions:

- employee benefits;

- recruitment services;

- marketing services (corporate website) and corporate functions;

- travel and accommodation services (travel agent, flights, car hire and hotels);

- professional services (external legal, other consultancy services);

- specialist cloud software services and security operations;

- enterprise software licensing;

- accommodation services (leasehold property) including fitouts;

- utilities (commercial rates; heating, cooling, data connectivity and voice, water and sewerage; cleaning (although some cleaning is conducted by landlords);

- postal and courier services;

- security and alarm services; and

- computer hardware (laptops, desktops, mobile devices, printer/copier leases);

Shared Services' top four procurement categories are (1) software/platform-as a service'; (2) rent and outgoings on leased premises; (3) professional IT services; (4) other professional services (legal, audit, cyber security and other consulting).

These services are predominantly obtained through Australia-based suppliers, though in the case of certain goods, countries of manufacturing origin may include China, Malaysia and Vietnam.

Pacific Topco operations

Pacific Topco Operations

Pacific Topco operations describes the Office of the CEO and the Board. This element manages the group's relationship with its owners (the shareholders), and the activities of its governing body (the Board of Directors of Pacific Group Topco Pty Ltd).

Pacific Topco Supply Chain and Procurement

- Pacific Topco operations primarily uses the services of Magentus and Citadel Edge shared services teams. This involves the following typical acquisitions:
  - investor management services (including share registry management);
  - travel and accommodation services (travel agent, flights, car hire and hotels);
  - non-executive director fees;

These services are obtained through Australia-based suppliers.

04

Preparing Our Statement

How This Statement Was Prepared

Corporate Authorisation

Under its Constitution and Shareholders Deed, Pacific Group Topco Pty Ltd's Board of Directors is ultimately responsible for the group's management, and by virtue of its ability to control the boards of each of its subsidiaries, it is able to influence the conduct of activities by the subsidiaries.

The Board of Pacific Group Topco Pty Ltd and each of its wholly-owned subsidiaries have supported the cooperative engagement by entities covered by this Statement in the processes and activities it describes. There is effectively one management team across each of the UK and Australian businesses, simplifying the group's Modern Slavery activities.

Activities

The Joint Company Secretaries, with assistance from area specialists, have managed the process of preparing this Statement.

Due diligence activities have included:

- drawing supply chain data from financial and inventory management systems;

- verifying and categorising the underlying use and nature of goods;

- analysing spend categories and volumes;

- assessing any new or revised publicly-available supplier statements compared to the prior analysis period;

- risk-assessing new suppliers during the reporting period;

- analysing updated NGO data on key suppliers;

- issuing and assessing supplier self-assessment questionnaires; and

- conducting open-source intelligence gathering on risk-rated suppliers.

05

Modern Slavery Risks in Our Supply Chain

Modern Slavery Risks in Our Operations & Supply Chain

Risk Identification

- Pacific Topco's software development, professional services, consulting and advisory operations are conducted through the personal efforts of our own professional and trade-trained Australian and UK employees and some specialist contractors.

- We have a small number of long-standing overseas-based suppliers, including in Tier 2 countries, though as reported in our last Statement, we remain satisfied that the services we acquire are unlikely to be exposed to Modern Slavery. Particular attention has been paid in the Reporting Period on assessing additional overseas supply candidates against modern slavery risk practices.

- For those team-members working on-site, we procure for them office space, communications and technology devices, and associated office-related products and services including cleaning, catering and beverages such as tea and coffee. Some contractors and employees work at client sites, and clients are responsible for some of these services.

- Modern Slavery risks exist in Pacific Topco's supply chain. The greatest risks arise from goods that originate from heightened-risk countries and in heightened risk sectors (often these both occur simultaneously). These are third, fourth or even greater tiers in the supply chain, and assessment of these exposures remains difficult. However, as noted in our prior Statements, in addition to reliance on our Tier 1 supplier modern slavery disclosures, we use NGO reports on these distant-tier suppliers, augmented by an open-source intelligence tool to monitor publicly-reported information globally concerning these supply chains that will alert us to any meaningful reports of potential non-compliance activities. We have also reverted to more direct engagement with our Tier 1 suppliers to attempt to elicit more direct information from their suppliers.

- Pacific Topco has identified in Appendix 2 the key risks of Modern Slavery facing the Group. Pacific Topco has also identified the key business unit or subsidiary with the most direct connection to these risks, and the "UN Guiding Principles" categorisation in terms of causation, contribution and direct linkage.

Modern Slavery Risks in Our Operations & Supply Chain

Risk Assessment

Departmental Guidance

- In assessing its Modern Slavery risks, Pacific Topco continues to have reference to Table 6 of the Guidance for Reporting Entities issued by the Australian Department of Home Affairs (**Guidance**), and the Department's supplementary guidance.

NGOs

- Pacific Topco has examined the latest reports from key NGOs involved in its higher-risk supply chain areas, including the 'Know the Chain' 2025/2026 Benchmark Study of ICT Companies and the specific assessments by KTC of Tier 1, Tier 2 or in some cases Tier 3 technology suppliers to the group. As previously reported, we have adapted our assessments following the changes in assessment methodology in the latest KTC report.

- Pacific Topco has also had reference to labour exploitation analyses from NGOs such as the Walk Free Foundation. We have also referred to the United States Department of State Trafficking in Persons Reports for 2025 in conjunction with our self-assessment questionnaire template and risk scoring system. We note the small improvements in the modern slavery environment reported by the State Department in relevant countries.

- A further uplift in the number of Pacific Topco's suppliers that are required to provide Modern Slavery Statements has assisted the Group in assessing the approaches to addressing Modern Slavery of its larger suppliers. As noted in previous years, there has been an improvement in the quality and presentation of Modern Slavery Information amongst some suppliers which has given us greater confidence in some aspects of our risk assessment.

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Remediation

Modern Slavery risks in our operations & supply chain

Actions Taken & Remediation Metrics – FY25

Process Improvement

Although we have been unable to obtain direct engagement with our customers on the topic of process improvement, updates in the SEDEX system have given us additional insights into the areas of process upon which we should focus to improve our modern slavery activities. These will be assessed and triaged for process improvement in FY26.

Engagement with high risk suppliers

Suppliers to certain business units in the Pacific Topco group with higher risk products and services (AV equipment) were issued with direct requests for confirmation concerning Modern Slavery practices in their supply chain, and contractual undertakings regarding ongoing due diligence. We received a 73% positive response with affirmative undertakings. One did not respond at all, and the balance instead directed us to their modern slavery statements, some of which were inadequate.

Further data sharing

We intended to improve our data sharing by adding what was then called The Citadel Group business unit to our SEDEX reporting. However, due to the completion of our restructure, that grouping no longer exists, and therefore in FY26 we will reassess the best and most meaningful way for our reporting to occur.

Modern Slavery risks in our operations & supply chain

Actions & Metrics – FY26

Process Improvement

We intend to use the SEDEX risk control feedback to improve our key process areas with the objective of improving our control score across the reporting entities to a level comparable with our peers.

Data sharing

Following our restructure, we will assess the best way for the Group to continue on its transparency journey with respect to its public Modern Slavery disclosures.

Direct engagement

We will continue to focus on our high-risk suppliers, and engage further to assess the adequacy of their controls and reporting.

Approval

This Statement was approved on 16 December 2025 by the Board of Directors of Pacific Group Topco Pty Ltd on its own behalf and on behalf of each of the entities identified in Appendix 1.
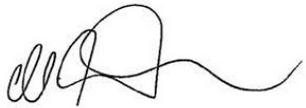
Mark McConnell
Executive Chairman and Director
Pacific Group Topco Pty Ltd

46/600 Bourke Street
Melbourne VIC 3000
Australia

Appendix 1

Pacific Topco Group Structure

Pacific Group Topco Pty Ltd
Group Structure

All ownership 100%.

Pacific Group Topco Pty Ltd ACN: 644302492

Pacific Group Midco Pty Ltd ACN: 644072248

Pacific Group Bidco Pty Ltd ACN: 644075221

Magentus Group Pty Limited ACN: 127151026

Level 1:
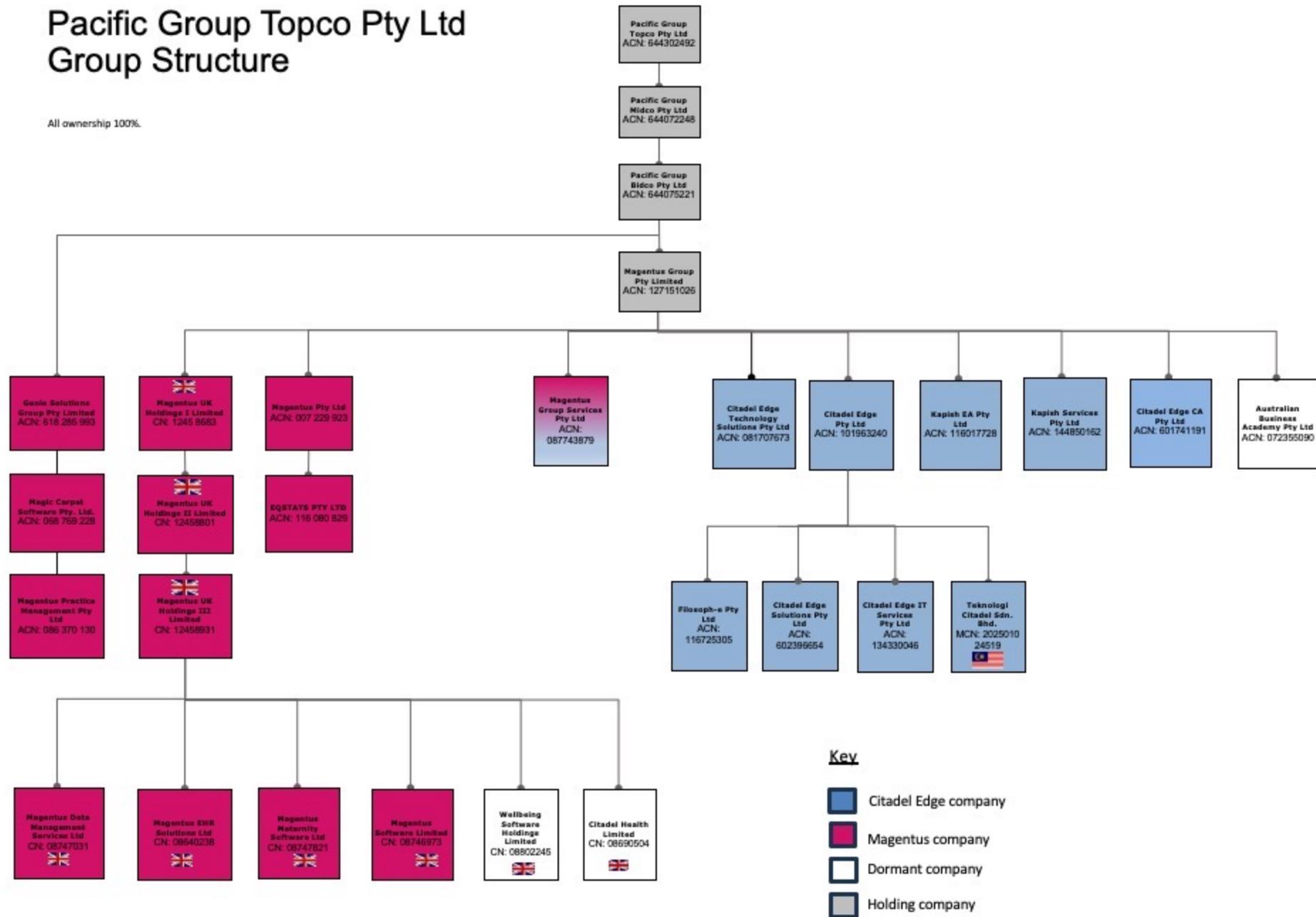- Genie Solutions Group Pty Limited ACN: 618 285 993
- Magentus UK Holdings I Limited CN: 1245 8683
- Magentus Pty Ltd ACN: 007 229 923
- Magentus Group Services Pty Ltd ACN: 087743879
- Citadel Edge Technology Solutions Pty Ltd ACN: 081707673
- Citadel Edge Pty Ltd ACN: 101963240
- Kapish EA Pty Ltd ACN: 116017728
- Kapish Services Pty Ltd ACN: 144850162
- Citadel Edge CA Pty Ltd ACN: 601741191
- Australian Business Academy Pty Ltd ACN: 072355090

Level 2:
- Magic Carpet Software Pty. Ltd. ACN: 068 769 228
- Magentus UK Holdings II Limited CN: 12458801
- EQSTATS PTY LTD ACN: 116 080 829
- Filosoph-e Pty Ltd ACN: 116725305
- Citadel Edge Solutions Pty Ltd ACN: 602396654
- Citadel Edge IT Services Pty Ltd ACN: 134330046
- Teknologi Citadel Sdn. Bhd. MCN: 2025010 24519

Level 3:
- Magentus Practice Management Pty Ltd ACN: 086 370 130
- Magentus UK Holdings III Limited CN: 12458931

Level 4:
- Magentus Data Management Services Ltd CN: 08747031
- Magentus EHR Solutions Ltd CN: 08640238
- Magentus Maternity Software Ltd CN: 08747821
- Magentus Software Limited CN: 08746973
- Wellbeing Software Holdings Limited CN: 08802245
- Citadel Health Limited CN: 08690504

Key

- Citadel Edge company
- Magentus company
- Dormant company
- Holding company

Magentus Group brands

Magentus

www.magentus.com

Kapish

www.kapish.com.au

CitadelEdge

www.citadeledge.com

Appendix 2

Pacific Group Topco Supply Chain Risks

Magentus Group Supply Chain Risks

Risk#	Risk	Proximity	Business	Linkage	Description
1	Extractive industries	Indirect	All divisions	DL	The following objects each rely on extractive industries for key components: AV technology products that Citadel Edge Tech procures for its customers; computing devices (mobile and static) that Magentus, Citadel Edge and their respective shared services procure for their own use; and the computing devices used by the cloud service providers used by Magentus, Citadel Edge and Kapish.
2	Debt Bondage	Indirect	All divisions	DL	The products identified above may be sourced from countries such as Malaysia, where there is potential for migrant labourers to be coerced or induced into debt-bondage arrangements in production facilities.
3	Labour Exploitation	Indirect	All divisions	DL	The products identified above may be manufactured in factories in China where owners make extensive use of unpaid 'interns' under vocational training regimes.
4	Labour Exploitation	Indirect	All divisions	DL	The goods above and more generally are shipped to Australia and the UK. Although the Group has no visibility over shipping lines used there is a risk of shipment using ships registered under 'flags of convenience'. These vessels frequently have low labour standards and crew members cannot leave ships in foreign ports without permission or face the risk of immigration detention.
5	Textiles	Indirect	All divisions	DL	The affected divisions purchase small numbers of articles of clothing for staff use – mainly in promotional situations such as trade shows and while required under customer contracts. However in the reporting period due to the rebrand, there was a greater consumption of these goods. These may be sourced from countries such as Bangladesh, India, Pakistan and China; countries which have documented risks of child and forced labour.
6	Labour exploitation	Indirect	All divisions	DL	Through its landlords, and in some cases directly, the Group consumes cleaning and facilities maintenance services, sectors which (notwithstanding clear and strong labour laws in each country), rely in some cases on recent migrants to Australia and the UK, who can be vulnerable to exploitation.

Appendix 3

Compliance Table

Compliance Table

Mandatory criteria	Page numbers
a) Identify the reporting entity	3,9
b) Describe the reporting entity's structure, operations and supply chains.	9-18
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	22-23, 31
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	25
e) Describe how the reporting entity assesses the effectiveness of these actions.	25
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	20
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant	N/A

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