

atturra

# Modern Slavery Statement FY23



# Introduction

Atturra Limited (**'Atturra'**) is a leading Australian technology services business, providing expertise across a broad range of specialist, in-demand IT areas.

At Atturra, we understand that modern slavery is a complex issue and acknowledge that the nature of our business means we are exposed to potential modern slavery risks across our operations and supply chain. We are committed to developing our understanding of the modern slavery risks in our business and taking action in responding to this problem by working with our business, subsidiaries, stakeholders, business partners and suppliers to limit modern slavery risks.

## About this statement

This joint Modern Slavery Statement (**'Statement'**) has been prepared and approved pursuant to Section 14 of the Modern Slavery Act 2018 (Cth) (the **'Act'**), by **Atturra Limited (ACN 654 662 638)** (**"Atturra"** **"we"**, **"us"** and **"our"**).

This Statement covers the financial year reporting period from 1 July 2022 to 30 June 2023 (**'Reporting Period'**). This is our second statement in relation to modern slavery and it assesses the progress we have made since the end of our first reporting period. This Statement sets out the process taken by Atturra to identify, assess and address the risks of modern slavery in our operations and supply chains as defined by the Act.

Atturra is listed on the Australian Securities Exchange (ASX code: ATA) with headquarters in Sydney. For further information, please visit [www.atturra.com](http://www.atturra.com). As at 30 June 2023, Atturra comprised of 31 controlled entities. This includes the acquisition of Hammond Street Developments Pty Ltd (**HSD**) in February 2023 and The Somerville Group Pty Ltd (**Somerville**) in April 2023. The ultimate parent entity of Atturra is Atturra Limited. The entities that sit below Atturra Limited are the individual business lines, each an incorporated entity, and which together comprise of Atturra. Please see Figure 1 for Atturra's Corporate Structure as of 30 October 2023.

All entities within Atturra are required to comply with the same policies and processes and the same suppliers are often shared. However, each entity comprises unique characteristics in its operations and supply chain. The procedures and processes for onboarding new suppliers is the same across all entities.

Atturra consulted the relevant companies it owns or controls in the development of this Statement. For clarification, each of Atturra's controlled entities are covered under this joint Statement and when referring to Atturra in this Statement, it includes all the entities set out under Figure 1 (collectively referred to as **"Atturra"**). The consolidation of the revenue of the entities owned by Atturra Limited triggers the requirement under the Act of entities over a \$100 million annual consolidated revenue threshold that are either classed as an Australian entity or a foreign entity carrying on business in Australia during the Reporting Period, to prepare and publish an annual Modern Slavery Statement.

We are proud to share with our stakeholders our commitment to addressing modern slavery and we recognise that we will

require a culture of continuous improvement over a number of years. We intend to work in partnership with our stakeholders to promote ethical practices to reduce the risks of modern slavery in our operations and supply chains.

## Our structure, operations and supply chain

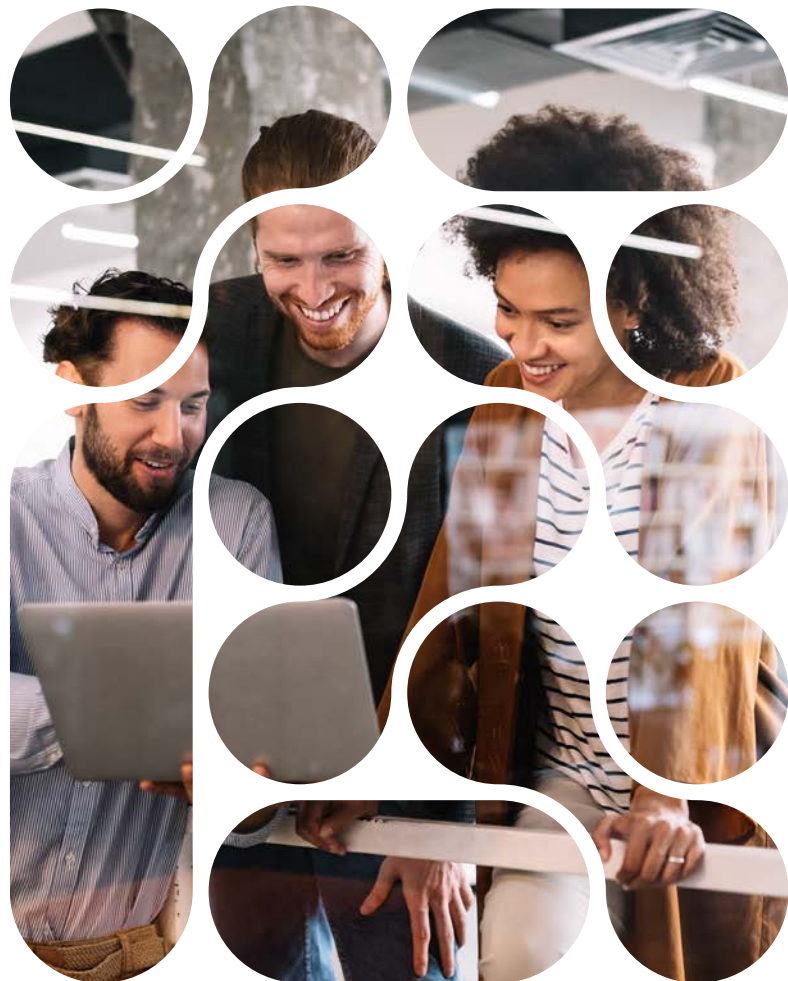
### Structure

Atturra is a public company and a leading ASX-listed technology services business. Atturra is a leader in designing, implementing, and maintaining IT solutions for many of Australia's largest private and public entities. Atturra offers consulting, IT services and technology solutions to accelerate digital transformation in the growing Australian IT services market.

Atturra Limited is the parent of several other Australian companies that ultimately form the Atturra business.

Our mission is to become a leading Australian IT solutions provider with high engagement across industries, employees and clients.

Atturra's registered office is Level 33, 88 Phillip Street, Sydney NSW 2000.



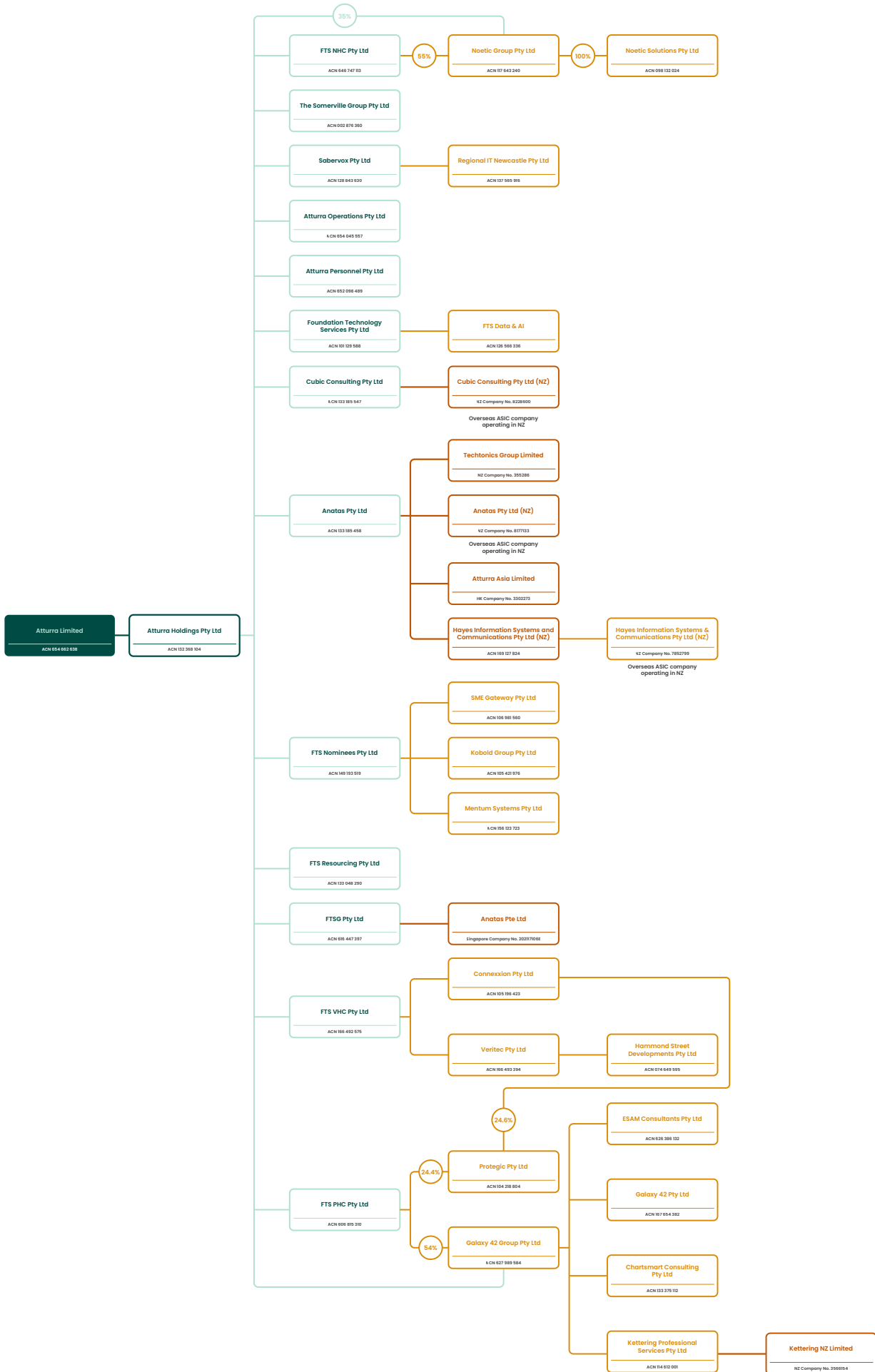


Figure 1: Atturra Corporate Structure

## Operations

Atturra provides a broad range and flexible suite of integrated solutions across the main business service segments including:

- Advisory and Consulting
- Business Applications
- Data and Integration
- Cloud Services
- Managed Services
- Management Control Solutions

Atturra currently engages over 800 consultants, IT and support personnel in Sydney, Melbourne, Brisbane, Canberra, Adelaide, Perth, New Zealand and Singapore. Atturra monitors its operational activities carefully, including staff and contractors, and has determined that there is very low risk of modern slavery practices occurring. Atturra ensures that all employees are legally entitled to work in the relevant jurisdiction and complies with all applicable laws, including providing employees with appropriate employment conditions such as hours of work, fair remuneration and wages and access to employment benefits. In the event that recruitment agencies are engaged to source personnel in jurisdictions outside Australia such as New Zealand and Singapore, Atturra ensures the rate (if any) charged to the individual is reasonable and that all local employment laws are followed.

## Supply Chain

Atturra's supply chain consists of more than 900 suppliers, the vast majority of which are companies based in Australia. Atturra engages a very small number of suppliers outside Australia, including from suppliers based in India and Singapore. These arrangements with overseas suppliers are considered low risk and the suppliers are typically engaged on a short-term or ad-hoc basis. Through its acquisition of HSD in February 2023, Atturra has onboarded 3 ongoing engagements with IT services suppliers in India which we assess as a low risk as well. The Atturra modern slavery committee conducted video interviews with these suppliers and has updated all agreements to include a modern slavery compliance clause. Atturra's substantial and material contractual relationships are with suppliers based in Australia. Atturra contracts with its higher value and strategic suppliers by way of a Supplier Services Agreement or Contractor Agreement depending on commercial terms. Since the enactment of Modern Slavery legislation in 2018, Atturra has been ensuring that appropriate modern slavery provisions are included in relevant agreements and will ensure ongoing agreements will include such provisions.

The majority of procurement spend is on individual contractors supplied onto client projects. The key categories of Atturra's suppliers are contractors/sub-contractors that deliver services to clients on behalf of Atturra, the re-sale of software licensing, the re-sale of IT hardware, and recruitment. Other categories of suppliers include professional services, IT hardware and services, marketing, PR services, merchandise, insurance, legal services, office consumables and facilities costs such as rent, utilities, cleaning and office fit outs. Atturra rents each office premises held by Atturra in different geographic locations. Services related to these premises such as plumbing, electrical and maintenance services are procured and managed by the relevant premises' building management.

# Risks of modern slavery practices in our operations and supply chain

At Atturra, we acknowledge that modern slavery risks can arise in our operations due to country and industry specific modern slavery risk factors. We also recognise that modern slavery risks are constantly changing over time, particularly due to external factors such as the COVID-19 pandemic. During this Reporting Period, we continued to monitor and assess modern slavery risks in our operations and supply chain.

## Risks in our operations

The Australian IT services industry within which Atturra operates is not considered to be a high-risk industry for modern slavery. Consequently, as a technology services business with a predominantly professional workforce, we have assessed the risk of modern slavery in our own operations to be low. Our internal operations and employees are based in Australia, which is considered to be a low risk country for modern slavery as noted in the Global Slavery Index 2018. However, we understand that the industry in which we operate can have modern slavery risks due to a lack of visibility over supply chains, exploitation and underpayment of workers and working conditions. While Atturra does not identify these practices within its own supply chain and operations, we are cognisant that these modern slavery risks can occur and consequently, we have implemented actions to address and mitigate these risks as described in this Statement.

Outside of Australia, Atturra also engages a small number of permanent employees in New Zealand and Singapore as part of its operations. These workers are employed directly with Atturra under conditions complying with applicable New Zealand and Singapore law. There is potential for geographic risks to exist in Singapore as the country has an estimated prevalence of modern slavery of 3.4 victims per 1,000 people in the population, which is a higher prevalence of modern slavery than Australia and New Zealand (according to the Global Slavery Index 2018). Further, the Global Slavery Index 2018 identifies geographic risks in Singapore due to the limited action from the Singaporean Government in response to modern slavery despite the magnitude of the problem and the resources at their disposal. Despite inherent geographic risks, Atturra does not consider this to be a high risk of modern slavery due to the limited number of employees based in Singapore and the measures Atturra has implemented to address any risks. Atturra has not identified increased geographic risks in New Zealand, particularly as the estimated prevalence of modern slavery practices in this jurisdiction is the same level as that in Australia (Global Slavery Index 2018).

## Risks in our supply chain

Atturra assesses the overall risk of its supply chain by considering each supplier's individual risk profile based on its geographic location, the nature of the goods or services provided, and the total value of payments made to the supplier. Atturra acknowledges that through its supply chain, it can be indirectly exposed to the risk of modern slavery including human trafficking and forced labour regardless of location or industry. Atturra expects its suppliers to monitor their own supply chain for modern slavery risks and maintain open communication and cooperate with Atturra regarding any potential breach of its modern slavery obligation. This expectation has been made known to its suppliers throughout the reporting year.

To better understand the potential risk areas in Atturra's supply chain, we developed a risk assessment process by undertaking supply chain mapping. This enabled us to better understand risks through contractual and industry perspectives, as well as inherent country risk factors relating to each supplier. In undertaking the supply chain mapping process, Atturra reviewed its supply chain and undertook a risk assessment of its suppliers using a number of criteria in order to identify any concerns relating to modern slavery. From this risk assessment, Atturra considers that its supply chain has low exposure to modern slavery risk areas. The supply chain mapping only identified a small number of higher-risk suppliers.

Atturra recognises product and service risks may exist when goods are purchased from suppliers who utilise modern slavery in their supply chain or when products procured contain materials that were sourced using modern slavery. Particularly, the supply chain mapping process identified key higher risk areas that Atturra identified and targeted for increased due diligence, included the following: Contingent Labour (including contractors, recruitment agencies, and payroll agencies), IT and marketing.

These areas were chosen as having (1) the highest spend and (2) a greater risk of modern slavery in relation to five key indices: decent wages, forced labour, migrant workers, modern slavery, trafficking on persons. Due to the heightened risk in these areas for modern slavery practices, Atturra targeted these higher risk areas for increased due diligence through the distribution of the modern slavery risk questionnaire.

Additionally, Atturra sources electronic equipment and materials which may entail modern slavery risks as it has little to no visibility or influence over the supply chain and therefore modern slavery risks. Through the acquisition of Somerville, Atturra has increased its procurement of IT hardware. We recognise that this procurement may involve a higher risk of modern slavery and have focused on this area in our supply chain mapping process.

In order to better understand the modern slavery risks in our supply chain, Atturra also distributed a modern slavery risk questionnaire to suppliers who were identified as "medium risk" following the supply chain mapping process as described above. The questionnaire sought to undertake a risk assessment of our major suppliers to enable Atturra to mitigate our exposure to modern slavery risks and ensure compliance to modern slavery laws. The questionnaire identified no instances of modern slavery in our suppliers' operations or supply chains and no concerns about labour practices. Further, the questionnaire demonstrated that several higher risk suppliers have plans or

policies in place to manage and mitigate modern slavery risks.

## Our actions

Atturra understands the importance of raising awareness to aid the ending of modern slavery practices. To that effect, Atturra has the following policies, processes and tools in place to assist in the detection and prevention of modern slavery risks.

### Policies, processes and procedures

**a) Code of Conduct:** Atturra is committed to making positive economic, social and environmental contributions to each of the communities in which it operates, while complying with all applicable laws and regulations and acting in a manner that is with honesty, integrity, fairness and respect. Atturra's Code of Conduct provides a framework for decisions and actions to ensure its duty of care to all employees and stakeholders.

**b) Anti-Slavery Policy:** Atturra's Anti-Slavery Policy affirms Atturra's commitment to upholding its responsibility to comply with all modern slavery laws and regulations. The policy sets out Atturra's commitment to identify, reduce and mitigate the risk of modern slavery practices within its supply chain and business operations. This policy also supports Atturra's mission to act with integrity to achieve the best outcomes for its clients. To read the full policy visit <https://atturra.com/au-en/anti-slavery-policy>.

**c) Nomination and Remuneration Committee:** At Atturra, we have processes in place to ensure employees are paid correctly and the hours worked by employees are monitored. The Nomination and Remuneration Committee oversees the process of appointment and remuneration of directors, senior executives and employees of Atturra.

**d) Audit and Risk Committee:** The objective of the Committee is to ensure the Company appropriately manages its business and operating risks. Part of these risks include economic, environmental and social sustainability risks which can extend to modern slavery risks in Atturra's operations.

**e) Recruitment processes:** Atturra understands modern slavery risks can occur where workers are charged illegal or excessive recruitment fees, are uninformed about the terms of employment or are fraudulently charged fees for work documentation. Consequently, for direct workers we aim to recruit directly without the use of recruitment services. Atturra avoids deceptive recruiting issues through finding workers via advertising and referrals, an interview process where the role expectations are clearly communicated and directly engaging with the potential worker to discuss employment terms and pay details. Where Atturra uses external recruiters for direct workers, Atturra pays all associated fees and exercises due diligence in ensuring the candidate does not pay unfair or unreasonable recruitment fees.

**f) Our values:** Our core values underpin everything we do. Atturra's core values are camaraderie, innovation,

dedication, excellence and respect. Our values are socialised with our people who are expected to act in accordance with them.

**g) Supplier Code of Conduct (new action):** Atturra implemented this code during the Reporting Period, which outlines the minimum standards we expect our suppliers to meet at all times. This includes obligations related to anti-bribery and corruption, human rights, health and safety, the environment and protecting information. It is easily accessible and available via this link, <https://investors.atturra.com/governance/>.

## Due diligence and remediation

During the Reporting Period, Atturra engaged in due diligence and remediation processes in line with the UN Guiding Principles to identify, prevent, mitigate and account for how we address our modern slavery risks.

**a) Modern Slavery Committee:** Atturra's Modern Slavery Committee comprised of 3 key executives among others, continues to meet regularly to determine and review the actions being taken to detect and prevent modern slavery in Atturra's supply chain. As at the date of this Statement, the Modern Slavery Committee has discussed and prepared policies relating to modern slavery and undertaken risk assessment processes including supply chain mapping and the follow up questionnaire. Additionally, the Modern Slavery Committee has prepared and delivered training to key personnel, prepared this Statement and discussed processes and procedures for managing modern slavery risks in this and the next reporting period.

**b) Supply chain mapping:** Atturra undertakes due diligence in respect of its key suppliers to ensure that these parties are aligned with Atturra policies, codes and values. Supply chain mapping involves categorising suppliers by risks associated with their geographic location, size and industry. This has been a key part of identifying and assessing actual and potential human rights impacts in accordance with UN Guiding Principle 17.

**c) Due diligence of acquired businesses (new action):** Atturra conducts a Modern Slavery risk assessment of its business acquisitions made during the Reporting Period (HSD and Somerville). This risk assessment includes interviews with management and supply chain mapping. Suppliers identified during this risk assessment are sent a follow up questionnaire and select overseas suppliers are interviewed to discuss their operations and supply chain in detail. Additionally, existing contract templates and contracts with suppliers are updated to ensure they include clauses relating to modern slavery.

**d) Follow up questionnaire:** Atturra requires suppliers identified as "high risk" during the supply chain mapping exercise to complete a modern slavery risk questionnaire to ensure compliance with modern slavery laws and to identify any issues. The follow up questionnaire covered questions including but not limited to the supplier's policies and procedures for modern slavery, compliance with legislation and the potential for modern slavery risks

in their operations or supply chain. Significant issues are escalated to senior management.

From the collated responses, Atturra was able to better identify and assess the actual and potential adverse human rights impacts including modern slavery in its supply chains. Any significant issues arising out of the questionnaires were to be escalated to senior management, however, none were reported. Ultimately, the questionnaire provided comfort that Atturra's suppliers were acting in compliance with Australian laws and regulations and assurance that there is a limited risk of modern slavery in Atturra's supply chain. Further, it improved Atturra's oversight and visibility over its supply chain and demonstrated the actions its suppliers were taking to assess and address modern slavery risks in their own operations and supply chain.

**e) Supplier Interviews (new action):** This Reporting Period, Atturra expanded its visibility of its international supply chain by conducting video interviews with selected overseas suppliers. These interviews involved questions focused on the supplier's operations, supply chain, and modern slavery policies, procedures and risks.

**f) Training:** At Atturra, we foster a culture of compliance, continuous improvement, integrity and honesty which is reflected in the way we conduct our business. Atturra's modern slavery obligations and policies, procurement process, and awareness of modern slavery risks are communicated to Atturra's employees through live and recorded training sessions. This training is delivered to senior management and personnel involved in procurement such as staff in the Marketing, HR, Talent Acquisition, Finance and IT departments. Additionally, this Reporting Period, training sessions were also delivered to staff that have joined Atturra as a part of acquisitions.

We encourage our directors, senior managers, suppliers, contractors and personnel to report any concerns or suspected breaches to our Anti-Slavery Policy. The Atturra Whistleblower Policy protects and safeguards the confidentiality, wellbeing and career of any individual who asserts any issues that affect the integrity of Atturra's business operations.

**g) Whistleblower Protection:** Atturra's Whistleblower Policy protects employees, service providers and suppliers who voice their concerns about certain events or conduct in the business that may be unlawful or unethical. The policy validates Atturra's efforts in safeguarding the confidentiality, wellbeing and career of any individual who asserts any issues that affect the integrity of Atturra's business operations.

**h) Continuous monitoring and Public Communication:** Atturra will continue to monitor and assess modern slavery risks and we will publicly communicate our actions taken to address these risks by publishing a Modern Slavery Statement annually (as required).

# Assessing effectiveness

Atturra recognises the importance of continuous improvement by regularly assessing the effectiveness of our actions taken to address modern slavery risks. In doing this, Atturra aims to build more transparent and open relationships with our suppliers in order to mitigate the risk of modern slavery in our operations and supply chain. The actions taken by Atturra during the Reporting Period have been effective in enabling Atturra to proactively identify, assess and mitigate any potential risk of modern slavery and human trafficking in its operations and supply chain. Atturra has increased due diligence efforts on those industry areas that we consider to be higher risk for us and will continue to increase due diligence processes into the next reporting period.

Atturra is focused on continuously strengthening its procedures and processes to combat modern slavery practices and ensuring the protection of human rights. In doing this, we aim to build more transparent and open relationships with our suppliers in order to mitigate the risk of modern slavery in our operations and supply chain. Atturra will continue to monitor, evaluate and assess the effectiveness of its established procedures by:

- a) monitoring Atturra's existing suppliers and undertaking risk assessments in relation to new suppliers to ascertain whether they pose a modern slavery risk and, if they do, to reduce that risk to the maximum extent possible;
- b) continually assessing the effectiveness of our actions in identifying and managing modern slavery risks, particularly by undertaking regular internal governance processes in accordance with our governance policies;
- c) reviewing and updating training material to ensure that it is up to date, relevant and effective;
- d) engaging with Atturra's suppliers and key customers to verify they are following through with any modern slavery actions they have committed to undertaking.

## Consultation

Atturra's corporate governance policies, practices and procedures, including our Anti-Slavery Policy, apply to all entities of Atturra Limited. During the Reporting Period this Statement covers, and in preparing this Statement, Atturra has consulted with key personnel within the entities it owns or controls, as required under section 16.1(f) of the Act, to ensure a comprehensive approach to detecting and preventing modern slavery risks. We discussed details of the Act's reporting requirements and criterion regarding the actions we intend to take to address these requirements. By doing this, we ensure our key personnel are aware of our commitment to identifying, assessing and addressing modern slavery risks in our supply chain and are conscious of the actions they need to take in accordance with this Statement.

Atturra's supply chain mapping process is conducted through an analysis of each individual business unit prior to categorising suppliers by risk. Additionally, modern slavery awareness training has been delivered to Atturra's Executive General Managers and all other personnel involved in supplier procurement within Atturra.

## COVID-19 pandemic

Throughout the COVID-19 pandemic, Atturra has consistently complied with Australian government regulations and health advice to ensure the health and safety of our personnel. To date, the COVID-19 pandemic has had a minimal impact on Atturra's operations as our consultants are generally able to work remotely. However, Atturra recognises this may not be the case for its suppliers and/or stakeholders. While there has not been an increased risk of modern slavery due to COVID-19 for Atturra's operations or supply chain, Atturra has continued to prioritise stakeholder and supplier engagement to ensure modern slavery risks are identified, assessed and mitigated in the context of the COVID-19 pandemic during the Reporting Period.

## Future commitments

Atturra is committed to further developing our processes as we progress our understanding about the modern slavery risks in our operations and supply chains and ways to mitigate them. Atturra takes a continuous improvement approach to compliance to ensure that we are demonstrating our progress over time as the business community increases its understanding of modern slavery. Over the next year, we intend to continue assessing the risks in our operations and supply chain through our Modern Slavery Committee, supply chain mapping, questionnaires, training and other actions taken.

The board of directors in their capacity as principal governing body of Atturra Limited have approved this Statement on 3 November 2023. This Statement is signed by Stephen Kowal in his role as Chief Executive Officer and Director of Atturra Limited on 13 November 2023 and the information in this Statement is accurate as of 30 June 2023.

*Stephen Kowal*