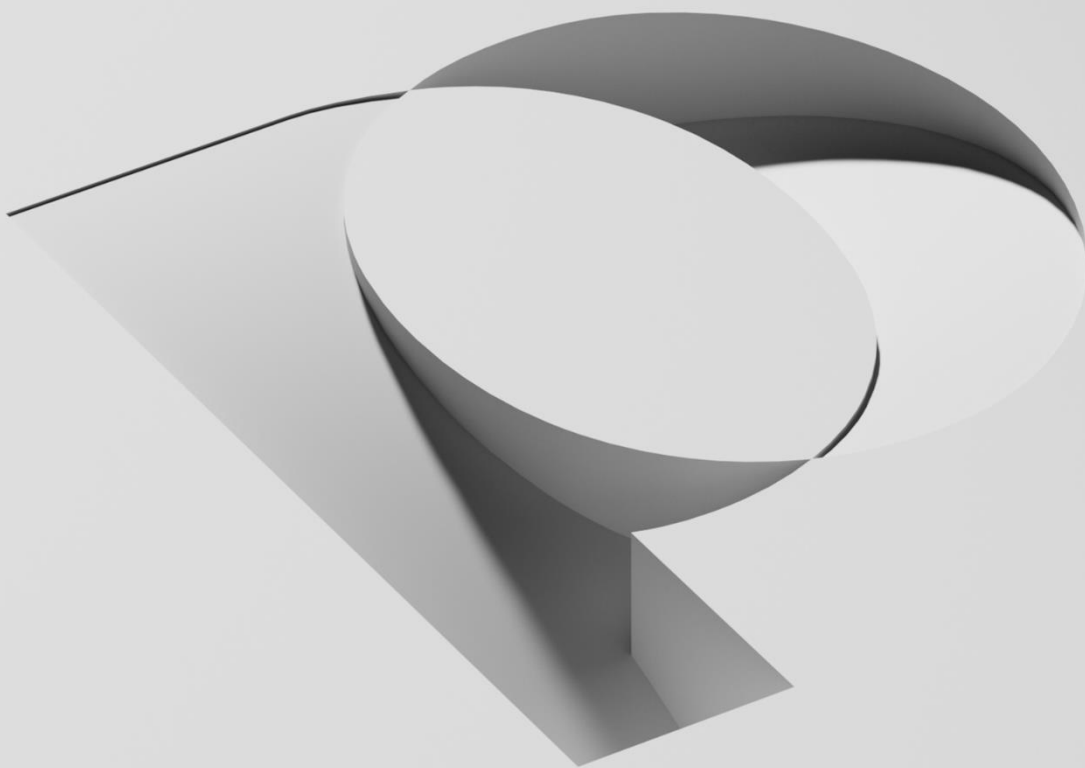# planit

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MODERN SLAVERY

STATEMENT

1. Introduction

This Modern Slavery Statement is a joint statement for SQA Holdco Pty Limited (ACN 603 366 196), SQA Bidco Pty Ltd (ACN 603 366 552), Planit Holdings Australia Pty Ltd (ACN 603 428 226), and Planit Test Management Solutions Pty Ltd (ACN 079 209 135), over the financial year ending 31 March 2024.

NRI Australia Holdings Pty Ltd (**NRIAU**) who wholly owns SQA Holdco Pty Limited and its controlled entities (together, **Planit Test Management Solutions**) recognise that together they have a responsibility to take a robust approach towards slavery and human trafficking-related issues. Our ethos and connection to this core business priority is aligned with our three values:

- Raise the bar, exceed expectations,
- Lead with integrity, collaborate openly,
- Inspiring minds, continuous growth.

2. Organisational Structure, Operations & Supply Chains

2.1 Structure

SQA Holdco Pty Limited is a proprietary company registered in Australia. It owns ten subsidiaries registered in Australia, New Zealand, the United Kingdom, India, and the Philippines.

The Planit Test Management Solutions entities are as follows:

(a) SQA Holdco Pty Limited (ACN - 603 366 196)

(b) Planit Test Management Solutions Pty Ltd (ACN - 079 209 135)

(c) Planit Software Testing Limited (NZ Co No - 2250282)

(d) Planit Testing India Private Limited (Corp ID No - U72900TG2016FTC110046)

(e) Planit Software Testing Limited (UK) (Company No - 08229920)

(f) Shift Left Group Limited (UK) (Company No – 09760730)

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(g) Shift Left Specialists Limited (UK) (Company No – 13951332)

(h) Planit Philippines Corporation (CRN – 2022030045133-05)

Planit Test Management Solutions is headquartered in Sydney, Australia and has other Australian offices located in Melbourne, Perth, Brisbane and Adelaide, as well as overseas offices in Auckland, Christchurch, Hamilton and Wellington in New Zealand, Reading and London in the United Kingdom, Hyderabad and Mumbai in India, and Manilla in the Philippines.

As of 31 March 2024, Planit Test Management Solutions workforce headcount comprised of 1742 employees. 672 of these employees were employed within the Australian branch of Planit Test Management Solutions.

Our workforce is primarily comprised of professionals such as consultants that deliver Quality Engineering and Assurance solutions in the Information Technology industry, who are supported by a comprehensive corporate services team.

2.2 Operations

Planit Test Management Solutions primarily operates in Australia, New Zealand, the United Kingdom, India and the Philippines, and does not normally operate outside of these countries.

Planit Test Management Solutions enables its clients to accelerate their delivery of quality software through its comprehensive range of quality assurance services, training, accelerators and on-demand solutions. Our services include quality engineering, quality assurance, software engineering functional testing, automation, performance, monitoring, virtualization, dev-ops, agile, accessibility, artificial intelligence and security.

2.3 Supply chains

Planit Test Management Solutions' supply chains are primarily comprised of organisations that are located within each country that we operate within, being Australia, New Zealand, the UK, India and the Philippines.

During the 2024 financial year, Planit Test Management Solutions engaged directly with approximately 593 suppliers from the five countries in which we operate.

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Planit also engages with a service provision from Germany for the supply of examination and assessment tools for our certified courses that are provided to our employees via our internal training department.

Planit Test Management Solutions' largest category of spend is on professional services, then on software for operational requirements.

The supply chain of products and services that contribute to our operations include professional services, software services, office management and facilities, travel and visa services, hardware and banking services, among others.

3. Risks

Risks of modern slavery in Planit Test Management Solutions' operations and supply chains

Planit Test Management Solutions' supply chains includes suppliers of software, computer equipment, professional services including for visa and immigration related services, novated leases, legal services, corporate travel services, florists and gift hamper companies, along with cleaning and general maintenance services for our offices.

Planit Test Management Solutions procures and sources services for business in each of the countries that we operate in locally. This contributes to the local economy of each country and ensures that our business is supported by prompt and reliable procurement and supply chains that can deliver on our business requirements.

As referenced above, Planit Test Management Solutions have two offices in India, one located in Hyderabad and the other in Mumbai. Further to this, Planit have an operation in the Philippines with an office located in Manila. Both the Philippines and India are identified as medium to high-risk countries under the Modern Slavery Index published by the Walk Free Foundation as detailed above.

In managing our overseas entities, including in India, the UK, the Philippines and New Zealand, Planit Test Management Solutions seeks to comply with all laws and regulations of these countries, including labor and employment laws.

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Planit Test Management Solutions has supplier relationships with companies in the UK, New Zealand, Australia, India and the Philippines. Planit Test Management Solutions considers the risks of modern slavery are more likely to exist beyond the first tier of its supply chains, where our suppliers may outsource some tasks and work, including for example, manufacturing and development of the products/services to high-risk countries overseas, which may increase the risk of exploited labour.

4. Actions

Actions taken to address modern slavery risks, including due diligence and remediation

Planit Test Management Solutions is committed to ensuring that it assesses and addresses the risks of modern slavery within its operations and supply chains and is committed to acting ethically and responsibly in all aspects of its businesses.

The prevention of modern slavery and the promotion of human rights within our operations is largely and primarily achieved by adherence with relevant employment laws and regulations. Planit Test Management Solutions has a responsibility to ensure that employees are not being exploited, they are safe at work and all relevant employment, health, safety and human rights laws are adhered to.

We set out a number of the processes and procedures implemented at Planit Test Management Solutions to assess and address the risks of modern slavery in further detail below.

At Planit Test Management Solutions, our ethos and three values underpin the actions and decisions made in our business every day. These key three values are the driving principles of the way we conduct our business and relationships with clients, customers, suppliers and other external stakeholders.

Raise the bar, exceed expectations

By staying at the forefront of our field, we achieve our clients' quality goals quicker, making technological possibilities a reality. We are committed to lifting the standard for others and being the champions of global quality.

Lead with integrity, collaborate openly

We act with integrity and accountability, communicating openly, with each other and with our clients. In doing so, we drive collaboration, welcome diversity of thought and make a greater contribution to our culture across the globe.

Inspiring minds, continuous growth

We are inherently curious. Continuously learning, seeking new experiences, acquiring new perspectives and taking on greater challenges. The pace of innovation means we will never know everything, but that won't stop us trying.

Policy framework

Planit Test Management Solutions has a number of policies, procedures and guidelines presently in force that seek to address modern slavery risks within our operations and supply chains. These materials are reviewed on an annual basis and updated accordingly to ensure they are reflective of and consistent with the evolving local and global context in which we operate. We have summarised this policy framework in further detail below.

Our employees and contractors are encouraged to raise suspected incidents of slavery, human trafficking or any unethical behaviour or conduct within our own operations or our supply chains using the procedures outlined in our whistleblowing policy. Planit Test Management Solutions values its culture of developing and fostering high standards of ethical and moral business conduct, and through our whistleblowing policy protected disclosures can be made by our employees, which are promptly reviewed and where applicable, investigated.

If employees are aware of any violation of the law or company rules, including any modern slavery practices, we also encourage employees to contact Planit Test Management Solutions' global parent company's (NRI Group) Global Whistleblowing hotline immediately. The helpline is managed by an independent firm and all reports made are anonymously and treated in the strictest of confidence. Planit Test Management Solutions is committed to ensuring that our employees can raise concerns without fear of retaliation or negative consequences.

Planit Test Management Solutions also has Fraud and Corruption Guidelines in place which outlines the principles we use to manage our risk of exposure to fraud and corruption and the shared responsibility of our management personnel and employees in preventing and addressing fraud. Our objective is to create a culture where fraud risk, control and identification is a responsibility of each employee.

The guidelines reinforce Planit Test Management Solutions' zero tolerance approach to fraud and corrupt practices. Our guidelines are also consistent with AS8001:2008, Fraud and Corruption Control Standards (Australia and New Zealand) and UK legislation in relation to fraud and corruption.

Where an employee has knowledge of an occurrence of irregular conduct or has reason to suspect that fraud has occurred, the Fraud and Corruption Guidelines set out the process and responsibilities of all employees to notify appropriate management personnel so that an investigation can be

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undertaken where deemed appropriate and necessary. Similarly, the Guidelines contemplate, where appropriate and necessary, the potential involvement of appropriate law enforcement officials.

Planit Test Management Solutions' Code of Conduct sets the standards for the behaviour and conduct of our employees and contractors on a global scale across all our international offices.

The Code of Conduct is aligned with our three key values as a business, as outlined above, which together set out the standards all workers must comply with, including in interactions or dealings with our clients, suppliers, contractors and the public.

We have a robust recruitment and selection policy to ensure all recruitment decisions are in line with our values, are based on merit, and are consistently and fairly applied.

The following steps are also undertaken by Planit Test Management Solutions to identify, address, and mitigate the risk of modern slavery and human trafficking within our own operations:

- all employees have a contract of employment that sets out the rights and obligations arising from their employment, including compliance with policies and procedures and the notice period needed for them to terminate their employment contract and leave Planit Test Management Solutions' employment. Employees are free to serve notice at any time;

- Planit Test Management Solutions carries out verification of an employee's identity and ongoing right to work in each country of operation and does not seek to withhold any of an employee's identity documents, such as their passport, for example;

- all employees are paid at least the relevant national minimum wage and Planit Test Management Solutions adheres to all legislation in respect of working time and statutory time off, providing for minimum amounts of holiday, time off due to personal emergencies, sickness and parental leave, and minimum rest breaks. This is provided consistent with legislative minimums in each operating country, or above the legislated requirements in each operating country; and

- all employees are required to undergo a comprehensive background check before commencing employment with Planit Test Management Solutions and every two years after their commencement.

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Planit Test Management Solutions expects its suppliers to maintain the highest standards of ethical business behaviour and conduct, and to become familiar with and comply with all laws that are relevant to the supplier relationship, including the laws that govern Planit Test Management Solutions and the wider NRI Group.

The following steps are also undertaken to identify, address, and mitigate the risk of modern slavery or human trafficking within our supply chains:

- embedding ethical sourcing and modern slavery policies into existing processes;
- creating communication channels with existing and future suppliers to enable assessment of modern slavery risks;
- reviewing policies, procedures and contract conditions to ensure that our objectives on modern slavery risk management can be implemented;
- communicating our values and policies on modern slavery and ethical business to our suppliers, customers and business partners to ensure that we align on our objectives in respect of addressing modern slavery risks within our operations and supply chains; and
- Thoroughly reviewing all potential new suppliers based on a set criteria, which includes a review of their ethical sourcing and modern slavery policies & practices. Planit Test Management Solutions will continuously review and consider what other steps and actions can be taken to assess and address the risks of modern slavery within our businesses and how we can work together with employees, suppliers and our clients to create greater awareness of modern slavery risks within our industry and area.

5. Assessment

Assessing the effectiveness of our actions

Planit Test Management Solutions has introduced the following measures to monitor the effectiveness of the actions that it has taken to mitigate the modern slavery risks in its operations and supply chains:

a) regular internal reviews on an annual basis of our risk assessment and talent acquisition processes to ensure they remain appropriate, reasonable and up to date. This assists our

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business to ensure that we regularly consider and analyse our agreements and relationships with both employees and contractors, but also our suppliers;

b) regular engagement and feedback between key areas (including procurement, people & culture and legal) on an annual basis in relation to the actions and measures we are undertaking to ensure a holistic approach is taken across various areas of business in assessing the effectiveness of our actions as it relates to modern slavery;

c) internal audits of our processes through Planit Test Management Solutions' Finance department (e.g. pre-qualification checks for suppliers, as generally our suppliers are not formally engaged until a review is undertaken by our Finance department); and

d) partnering with our suppliers and industry groups to address modern slavery risks and to ensure that we are taking collaborative steps to assess the effectiveness of these measures.

Planit Test Management Solutions is also externally audited by Ernst & Young (**EY**) on an annual basis in relation to our business, operations, policy effectiveness and processes. This external auditing by EY provides an assessment by an independent third party of our practices, including an assessment as to the effectiveness of the actions we are taking to mitigate modern slavery risks within our operations and supply chains.

At a global level, Planit Test Management Solutions' global parent company, Nomura Research Institute, has an internal team based in Tokyo which also undertakes an assessment of various vendors through internal and external blacklists and approves relevant engagements of vendors. Our internal legal counsel communicates on every new client and engagement before commencing interaction. This is now a standard operating procedure across the group. This acts as an additional measure to ensure the effectiveness of ongoing actions being taken by NRI Group, which includes Planit Test Management Solutions, to assess and address risks of modern slavery within its operations and supply chains.

Planit Test Management Solutions is committed to continuing to develop and identify further mechanisms and actions that we can take not only as a business, but within our industry, to ensure we establish appropriate systems to assess the effectiveness of our actions in addressing the risks of modern slavery within our operations and supply chains.

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6. Consultation

In preparing this Statement, Planit Test Management Solutions consulted with a cross-functional working group of employees across Planit Test Management Solutions entities with responsibility for the oversight of procurement, legal and risk processes across our businesses. Planit Test Management Solutions' management team members with specific operational responsibility for the reporting entities covered by this Statement (and the entities controlled by them) were also asked to provide feedback on the Statement prior to it being presented to the board of directors of NRIAUH for final review and approval.

7. Approval

This statement has been approved by the board of directors of Planit Test Management Solutions on 21 August 2024

Mike Weale

Chief Executive Officer

Planit Test Management Solutions

Date: October 2024

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Deliver securely, with confidence

ISO

ISO 27001 information
security standards

ISO

ISO/IEC/IEEE 29119
software testing standards

ISO

ISO/IEC 25010 system &
software quality models

IEEE 1028 software reviews
& audits standards

ISTQB

ISTQB, iSQI, TMMi, TPI &
TPI Next testing standards