

RPMGLOBAL

RPMGlobal Holdings Limited

ACN 010 672 321

FY2021 Modern Slavery Statement
for the financial year ending 30 June 2021

Reviewed by the Board on 28 October 2021



Introduction

The following statement is made in line with the *Modern Slavery Act 2018* (Cth) and the *Modern Slavery Act 2018* (NSW) by RPMGlobal Holdings Limited (**'RPM'** or the **'Company'**) with this Modern Slavery Statement (the **'Statement'**) applying to the Company and all its related subsidiaries and group companies. This Statement is made for the financial year ending 30 June 2021 (the **'Reporting Period'**).

This Statement outlines the steps RPM has taken during the Reporting Period to identify and address modern slavery risks in RPM's operations and supply chain.

RPM requires ethical and transparent labour practices and, consistent with these principles, takes a zero-tolerance approach to any form of modern slavery.

The Statement has been reviewed by the Board and a copy of the Statement is accessible to both the public and all officers and employees of the Company via the Company's website (available at www.rpmglobal.com) and via the Australian Border Force's website (available at <https://modernslaveryregister.gov.au/>).

All enquiries or feedback should be directed to RPM's compliance team at companysecretary@rpmglobal.com.

Purpose

RPM acknowledges the importance of transparency in connection with its procurement processes and commercial functions across the globe as a publicly listed company (ASX:RUL). As a result, high ethical standards of business operation are held to account via RPM's policies.

The purpose of this Statement is to document RPM's continuing understanding and acknowledgement of the importance of the fundamental human rights contained in the *Universal Declaration of Human Rights 1948* ('UDHR'). The Company agrees that Modern Slavery is a serious violation of one's dignity and human rights and strives to eliminate exposure to such violations.

The Company is committed to protecting and advancing human dignity and human rights by managing the risk of Modern Slavery throughout its supply chain, domestic and international business practices and any other business relationships in accordance with all applicable laws, regulations and company policies.

Company Structure, Operations and Supply Chains

As a publicly listed Company, RPM operates in a 'top-down' manner, placing the Board at the top of the organisation, mitigating the company's risk and exposure to any wrongdoing.

The Board acts as the ultimate decision-maker with a carefully managed delegation of authority to management and matters reserved for the Board. Operationally, all employees report to the Company's Chief Executive Officer.

RPM's headquarters is in Brisbane, Australia. Operating offices in 22 locations across 14 countries and working in over 125+ countries, RPM's business consists of selling licensed Software and providing technology, Advisory services.

The Company's internal risk mitigation functions work cohesively to ensure that its employees are aware of and continually focus and strive for complete adherence with all global policies and local laws that apply to them.

RPM procures services and products from a number of suppliers who are required to comply with RPM's Supplier Code of Conduct.

For the financial year ending 30 June 2021, the Company's total expenses were 68.5m.

Modern Slavery Risk Identification and Management

RPM acknowledges that risk is inherent in all aspects of its business operations and being able to effectively recognise and manage risks and opportunities is critical to success. This financial year, RPM's Board reviewed and updated its companywide Risk Management Framework.

RPM's risks relating to Modern slavery are in connection with its supply chain, which is made up of many businesses that operate in a variety of industries and regions around the globe.

Because of this RPM strives to actively engage with its suppliers and proactively seeks to increase the level of visibility of the origin of goods and services procured by RPM.

The industry in which RPM most commonly engages with is the Mining Industry. Operating on a global scale potentially exposes RPM to a broad range of Modern Slavery risks if not continually mitigated both internally and externally.

Whilst the majority of the Company's first-tier suppliers are based in Australia, RPM recognises that supply chains are complex and often involve a number of indirect inputs. RPM will continue to focus on any high-risk suppliers and customers especially those located in geographical areas of higher risk or potential exposure to slavery. All suppliers regardless of their location are required to comply with RPM's Supplier Code of Conduct.

The impacts of COVID-19 were felt across the Company, fortunately not as strongly as the year prior. There was no evidence of any direct increased risk of Modern Slavery to the employees of RPM due to COVID-19.

In line with the *'United Nations Guiding Principles on Business and Human Rights'*, all Company employees are engaged on terms and conditions which comply with Australian and relevant local laws to ensure they are not put at risk of any Modern Slavery throughout their employment term.

Actions taken to assess and address Modern Slavery risks

The Company has taken steps to address Modern Slavery, which have aided in the comfortability of its stakeholders that RPM is respecting human rights.

RPM released an announcement to the ASX on the 16 June 2021, disclosing its intention to enter into a share purchase agreement to acquire 100% of the issued share capital of the Australian headquartered Environmental Social and Governance services company, Nitro Solutions Pty Ltd ('Nitro'), which was ultimately finalised on 1 July 2021. As a part of its due diligence, RPM assessed Nitro's existing client base and current employee practices. Upon the on-boarding of Nitro employees to RPM, the new employees went through a selection of HR coordinated inductions, topics including such things, but not limited to modern slavery and anti-bribery and corruption were briefly covered. All of Nitro's existing work was completed and all relevant existing clients transitioned over onto RPM contract terms and conditions, ultimately extending their obligations to comply with RPM's modern slavery, anti-bribery clauses and its Supplier Code of Conduct.

A number of processes relating to governance and compliance have been implemented to assist in RPM's mitigation of its exposure to Modern Slavery.

The Company published a global Modern Anti-Slavery Policy in July 2019, which applies to all persons working for or on behalf of RPM in any capacity, and includes employees, directors, officers, contractors, subcontractors, and any other third parties that deal with RPM. The Policy sets out to maintain and improve current business practices within RPM's scope to prevent Modern Slavery.

On July 2019, RPM also implemented a Supplier Code of Conduct which establishes the minimum standard of behaviour that is expected of any suppliers, contractors, subcontractors, partners and any other third parties that deal with the Company. RPM complies fully with the content and spirit of all laws, legislation and regulations which govern the Company and its operations, business environment and employment practices. This Code of Conduct ensures Suppliers adhere to the same compliance standard as RPM in that they conduct themselves, their business operations, relationships, practices and sourcing in a lawful and ethical manner.

The Company implemented a Whistleblower Policy in July 2019 to set out a pathway for grievance and remedial processes. It ensures that any person who is to report or raise concerns regarding serious wrongdoing or unethical conduct will be treated fairly without detriment.

On April 2020, in line with its obligations as a listed Company, RPM published its first Modern Slavery Statement on the Australian Border Force's Register, which is available to read [here](#).

To further strengthen its mitigation of any Modern Slavery risks in its supply chain, RPM has maintained the use of a Modern Slavery clause which sits within its Supplier Agreements to ensure that any work commencing under such Agreement type will be subject to the compliance of Anti-Slavery practices by both parties.

Assessing the effectiveness of these actions

RPM is continuing its efforts in working towards implementing additional methods of mitigation to ensure greater ability to assess effectiveness over future reporting periods.

Looking forward, the Company remains eager to roll-out employee training specifically on the topic of Modern Slavery. This more extensive mode of training will be provided as a part of the employee on-boarding process, conducted by the relevant key personnel. The Company is committed to bringing current employees, including senior management and executive management up to speed with periodical training-refreshers.

RPM endeavours to draft an extensive questionnaire for its suppliers in further mitigate its Modern Slavery risk within its supply chain. This questionnaire will be given to all potential suppliers, so that RPM can assess its capability and suitability as supplier going forward.

The Company is determined that it will be able to conduct further risk identification for higher risk countries, product categories and supply chains in the coming months. For existing suppliers, RPM will embed ongoing due diligence and oversight of Modern Slavery risks in standard supplier management processes.

RPM endeavours to periodically review and update the Supplier Code of Conduct and Modern Anti-Slavery Policy as necessary.

Consultation with RPM subsidiaries

All subsidiaries of RPM operate in accordance with global policy and local laws. This statement extends to each subsidiary and all commitments made under this Statement will apply to each.

RPM's policies, systems and processes in this important area have been prepared in consultation with the various functions in our business including our HR, operations and legal & risk teams in a collaboration that seeks meaningful progress in the elimination in human rights

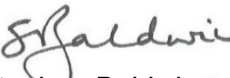
violations and modern slavery risk. This Statement was reviewed by RPM's Group General Counsel and EGM of HR who are responsible for the overarching risk management in this area. The policy has been approved by RPM's Board of Directors.

RPM Commitment to Ongoing Monitoring

RPM recognises the need to continue to build its understanding, oversight and management of modern slavery risks in our operations and supply chains.

RPM will review and update its policies, practices and procedures, as required, to maintain appropriate safeguards against any mistreatment of persons involved in our business.

Approved by the Board of RPM –28 October 2021.


Stephen Baldwin

Chairman

RPMGlobal Holdings Ltd