



Xpansiv Limited Modern Slavery Statement 2021

1. Identify the reporting entity

This Modern Slavery Statement (**'Statement'**) is made by Xpansiv Limited (ACN: 610 645 148) (**'Xpansiv'**) pursuant to the *Modern Slavery Act 2018* (Cth). This statement relates to the reporting period commencing 01 January 2021 and ending 31 December 2021 (the **'Reporting Period'**).

2. Describe the reporting entity's structure, operations and supply chains

Xpansiv is an unlisted public company incorporated in Australia. Xpansiv wholly owns and controls a number of subsidiary companies, which are incorporated variously in Australia, the United States of America, the United Kingdom and Canada. Xpansiv's registered address is Level 13, 20 Bridge Street, Sydney NSW 2000.

Our company's values and mission are informed by environmental, social and governance considerations. Whilst Xpansiv is not aware of any modern slavery in its operations or supply chains, we endeavour to take a continuous improvement approach to ensuring the risk of slavery in our operations and supply chains are minimised.

Our operations

Formed in 2019 through the merger of CBL (founded 2009) and Xpansiv (founded 2016), at the end of 2021, Xpansiv had employees and offices in Sydney, New York, San Francisco, Seattle, Houston, Vancouver, London, Milan, and Bendigo.

Xpansiv is the global market infrastructure for registering, managing, trading, settling, retiring, analysing, and reporting an infinite array of data-driven environmental commodities in an intuitive, user-friendly environment.

We provide tools and information to more accurately value agriculture, energy, and materials; we're unleashing the power of global markets to deliver a world worthy of future generations.

Our supply chains

During our reporting period we engaged suppliers from a number of industries, primarily:

- IT infrastructure, equipment, software and consulting services
- Financial services, including banking and insurance
- Professional services
- Lease of office premises
- Facilities management services, including security and cleaning
- Kitchen supplies and food and beverage supplies
- Office suppliers, such as pens, paper, notebooks and folders
- Furniture, such as desks, chairs and filing cabinets
- Travel and hospitality
- Media, marketing, promotional materials and merchandise

- Utilities
- Telecommunication
- Postal services

3. Describe the risks of modern slavery practices in our operations and supply chains

We believe that the risks of modern slavery are very low for the operations and supply chains within our direct control. Our employees work in office-based roles and are remunerated competitively. Our employment contracts and workplace policies are carefully developed to maximise employee wellbeing and ensure compliance with the employment laws of wherever we operate. Furthermore, the countries in which we operate have a very low prevalence of modern slavery according to the Global Slavery Index.

We recognise that there may be a risk of modern slavery in some of the operations and supply chains which we do not have direct control or management over. For example, we have limited visibility over the risk of modern slavery when acquiring office supplies, kitchen supplies, furniture, or food.

4. Describe the actions taken by the reporting entity and entities it owns or controls to assess and address these risks, including due diligence and remediation process

We minimise the risk of modern slavery in our operations by constantly striving to maximise employee wellbeing and ensuring adherence to relevant employment laws. Our workplace policies serve to mitigate the risks of modern slavery in our operations by creating a respectful and cordial work environment. These policies include, but are not limited, to:

- Our Code of Conduct which addresses bullying, harassment, discrimination, equal employment, and grievance handling
- Our Anti-Bribery and Corruption Policy
- Our Whistle-Blower Policy

This Code and these policies apply to Xpansiv and all the entities which it owns and controls.

The effectiveness of these policies is enhanced by our mandatory workplace training which promotes compliance and awareness.

Xpansiv takes a risk-based approach to managing modern slavery and human trafficking in its use of third-party providers and vendors. Third-party providers and vendors are engaged in accordance with our Third-Party Risk Management Policy and Procedures which require the vetting of providers. In addition, we conduct periodic risk and performance analysis of our active third-party providers and vendors.

Our Risk, Legal and Human Resources departments, in co-ordination with senior management, take reasonable precautions to avoid complicity in modern slavery practices. As part of the due diligence process, where appropriate (e.g., where a supplier operates in an industry or country which we have assessed as being vulnerable to modern slavery), we may request additional information and assurances relating to the third-party provider's business

operations and supply chain. Our standard form supply agreements also require vendors to comply with local and international laws.

We also minimise risks in other ways, such as by exercising care in respect of our cost requirements and delivery timeframes to ensure our suppliers are not unduly pressured to cut costs on labour or rapidly increase their workforce. We also address indicators of modern slavery by remaining alert to any observable signs of modern slavery which might occur in the supply chains which we readily observe (e.g., our cleaning services). Consistent with our Code of Conduct and policies, we expect our employees to report any such signs to our management immediately.

Our appreciation of the risks of modern slavery and the importance of mitigating the risk of its occurrence in our supply chains and operations continued to evolve during the Reporting Period. We are firmly committed to a continuous improvement approach so that our policies and procedures improve in their ability to alleviate the risks of modern slavery.

5. Describe how the reporting entity assess the effectiveness of these actions

Xpansiv is in the process of assessing the effectiveness of its policies and practices in relation to combatting modern slavery. As part of our continuous improvement approach, we look forward to implementing comprehensive tools and methodologies which will allow us to report on the effectiveness of our actions precisely.

6. Describe the process of consultation with any entities the reporting entity owns or controls

This Statement was developed by Xpansiv in consultation with each of its wholly owned subsidiaries, all of whom are subject to our policies, procedures, and systems. We routinely liaise and share information and resources with our corporate group.

7. Statement

This statement was approved on 17 February 2023 by the Board of Directors of Xpansiv and is signed by a Director of Xpansiv.

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Joe Madden

Executive Chairman, Xpansiv Limited

17 February 2023