

July 2023

Modern Slavery Statement

Our Stance on Modern Slavery

Statement from the Managing Director

Spirit is committed to eradicating Modern Slavery & Human Trafficking in all its forms.

We aim to increase our engagement across our vendor partners to continuously ensure that we have a “slave-free” supply chain.

Our statement outlines our intention and commitment to the Modern Slavery Act 2018. It also describes the steps that we have taken to identify, manage and mitigate the specific risks of Modern Slavery & Human Trafficking in our operations and supply chains.

Julian Challingsworth

Managing Director

Spirit Technology Services Pty Ltd

Our Structure

Spirit Technology Solutions Ltd is an ASX listed company (ASX: STI) (“Company” or “Spirit”)

Intalock Technologies (ABN 68 143 449 067) and Nexgen Investment Group (606 251 503) are fully owned subsidiaries of Spirit Technology Services Pty Ltd.

Based in Melbourne, Spirit (including our subsidiaries) has offices in Sydney, Dubbo, Brisbane, and the Gold Coast, and employs 320 staff throughout Australia.

Our operations

Spirit builds secure modern workplaces for Australian businesses.

Cyber Security is at the heart of our business, in addition to Communication & Collaboration and Managed IT Services.

Our vision is to create and be part of a thriving and resilient Australian economy, community, and environment through improved use of advanced technology. We aim to make our customers secure, sustainable, and scalable.

Our Supply Chains

The conduct, operations, and performance of Spirit’s suppliers can have a significant impact on Spirit’s own performance and reputation.

Spirit strives to work with suppliers that match our values and promote sustainable business practices, including those related to human rights.

Our supplier relationships cover the following sectors:

- Information, communications, and technology (Low to Medium Risk)
- Professional services (Low Risk)
- Property and utilities (Low Risk)
- Marketing and promotional services (Low Risk)
- Corporate services, such as office supplies, couriers (Low to Medium Risk)

Spirit acknowledges and recognises the potential for Modern Slavery & Human Trafficking to occur within our supply chains, regardless of location.

The largest Human Rights risk for Spirit is associated within the indirect supply chain of IT Hardware purchased for the provision of IT services to our customers.

Our suppliers are expected to manage their business and supply chain in a manner that respects human rights as set out in the [UN Universal Declaration of Human Rights](#) and the [UN Guiding Principles on Business and Human Rights](#).

Suppliers are also expected to ensure that all employees and contractors are legally entitled to work and that no bonded, forced, or involuntary labour, child labour, human trafficking or other forms of slavery is employed in the delivery of their products or services to Spirit.

Due to the industry that we service, we have continued with our engagement across our suppliers to determine their commitment to maintaining a “slave-free” supply chain.

We are focused on identifying, assessing, preventing, and mitigating human rights risks relating to Spirit and our business.

Our Workplace

We are committed to complying with the relevant local and national laws, community expectations and ethical standards related to modern slavery and human rights in respect to our employees, our customers, and our business operations.

As part of Spirit's commitment to ensuring that all employees are treated with equality and respect, we do not tolerate any form of discrimination or harassment and we strive to be an equal opportunity employer.

We are committed to building and maintaining a safe and inclusive workplace, ensuring our employment conditions adhere to legislation that outline minimum wages, appropriate hours of work and leave provisions, as well as the ability to sustain the health, safety and wellbeing of our employees, contractors, and visitors.

Our employees are encouraged to report genuine concerns about any conduct or activity they believe is unethical, illegal, fraudulent, undesirable, or corrupt and we offer a variety of channels for them to do so.

Spirit has group policies in key areas, including:

- [Corporate Governance Statement](#),
- Risk Management Policy,
- Corporate Code of Conduct,
- Whistleblower Policy, and
- Diversity Policy

Our continued engagement with our people reflects Spirit's commitment to supporting a "speak up" culture, allows an "eligible whistle blower" to anonymously report and disclose improper conduct confidentially, and on reasonable grounds without the fear of reprisal or detrimental action.

Training and Communications

There are a significant number of compliance obligations that apply across our day-to-day activities at work, whether they are laws, regulations, code of conduct or ethical standards and we are committed to educating our employees about them.

Ensuring that our people have a good understanding of, and respect for, human rights is important, and Spirit enables this through training and awareness across our teams.

We have introduced modern slavery awareness training as part of our staff development programs for all staff, facilitated in our Learning Management System, and will continue to refine this over time.

Spirit continues to create and maintain both a diverse workforce and an inclusive and safe workplace for all.

Tracking and reporting of follow-up actions

Spirit is committed to remediating any identified instances of human rights and modern slavery abuses in our operations and supply chain. Achieved by:

- Creating further awareness of what Modern Slavery & Human Trafficking means and impacts on Spirit's operations,
- Completing assessments of our supply chain (extending the assessment to product level) to eliminate potential Modern Slavery & Human Trafficking risks; and

- Collecting data on suppliers who undertake the Supplier Assessment Questionnaire (SAQ), and subsequently conducting further engagement risk assessments to flag potential human rights issues.

We also keep abreast of industry-related trends and developments to pro-actively identify potential Modern Slavery & Human Trafficking risk areas (e.g., Modern Slavery Act 2018 (NSW)).

Planning Ahead

Since launching our first Modern Slavery statement in 2021, Spirit has:

- ✓ Continued to raise awareness of Modern Slavery & Human Trafficking by deployed training within our Learning Management System, which is mandatory for all Spirit employees.
- ✓ Reviewed FY23 business activity with specific suppliers identified from a review in 2022, and this continues to indicate that we have low risk.
- ✓ Reviewed the Modern Slavery policies and practices of our major distributors, vendors, and recruitment partners.
- ✓ Created a Supplier Code of Conduct and communicated our expectations to our suppliers.

Spirit has an ongoing commitment to ensure compliance and anticipates further work to:

- Embed and uphold group policies throughout our supply chain.
- Engage with the IT industry to consult and collaborate on Modern Slavery.
- Embed learning throughout our organisation to ensure a deep and continuous understanding across our employees.
- Constantly review best-practice and respond accordingly.

If a modern slavery and/ or human rights issue appears, we would take the same approach to remediation as any controlled entity and determine an appropriate course of action based on whether the entity had caused, contributed to, or been directly linked to the adverse human rights impact.

Consultation

We consulted the relevant companies we own and control in the development of this Statement.

Approval

The Statement was reviewed and recommended to the Board for approval by executive management. This Statement has been approved for release by the Spirit Board of Directors.



James Joughin
Chairman

30 April 2024