

InComm Australia & New Zealand Pty Ltd

Modern Slavery Statement FY 2024

Criteria required under the Act	Page reference in this statement
<i>Identify the reporting entity</i>	1
<i>Describe the reporting entity's structure, operations, and supply chain</i>	1
<i>Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns and controls</i>	2
<i>Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes</i>	3
<i>Describe how the reporting entity assesses the effectiveness of these actions</i>	4
<i>Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)</i>	5

1. Background

This Modern Slavery Statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**). It sets out the actions taken by InComm Australia & New Zealand Pty Ltd (ACN 125 567 357), ("**InComm ANZ**", "**us**", "**we**" or "**our**"), to assess and address modern slavery risks in our operations and supply chain during our financial year ending 28 February 2024. InComm ANZ is a reporting entity for the purposes of the Act.

InComm ANZ is committed to conducting business in a responsible and ethical manner. As part of this commitment, we place importance on implementing practices to mitigate modern slavery risk in our operations and supply chain. We aim to partner with organisations who align with our ethical values and demonstrate the same commitment, many of which we have had successful long-standing relationships with.

2. InComm ANZ's structure, operations and supply chains

2.1 Structure and corporate details

InComm ANZ is a privately-owned payments technology company, incorporated in Victoria in 2007. InComm ANZ is a wholly owned subsidiary of HI Technology Corp (**HTC**), a global business with its principal place of business located in Atlanta, USA.

InComm ANZ owns and/or controls the following entities (**Subsidiaries**):

- (a) InComm TCN Holdings Pty Ltd (ACN 662 754 878);
- (b) TCN Group Pty Limited (ACN 626 501 568);
- (c) The Hotel Card Pty Ltd (ACN 626 509 171);
- (d) The Movie Card Pty Limited (ACN 621 449 769);
- (e) TCN Group Pty Ltd Company Number 8398361 (a New Zealand company); and
- (f) TCN Group Limited (09807035 ENG & Wales).

For the purposes of this statement, references to "the InComm ANZ Group" are references to InComm ANZ and each of the Subsidiaries listed above.

InComm ANZ Group currently has 55 employees and one office.

2.2 Operations

InComm ANZ is a large-scale provider of gift card and related payment solutions to retail, grocery, sports, entertainment and hospitality sectors. Our extensive portfolio of offerings has been established through the development of strong corporate partnerships to connect consumers around Australia to the products and services they want and need. We are proud to offer comprehensive services to retailers and corporate partners such as the supply, distribution, fulfillment and marketing of physical and digital gift card products. At InComm ANZ, we are passionate about helping Australians to gift better and in new and exciting ways every day. Our team is dedicated to creating innovative solutions that inspire gifting and make the experience more personal for both the giver and the recipient.

We operate out of one office located at 250-254 Swan Street, Richmond, Victoria 3121. This is a corporate office out of which our business and financial operations are managed.

2.3 Supply chain

Our supply chain supports us through the provision of goods and services (including materials for our gift cards and third-party gift cards, printing services, manufacturing of gift cards and packaging solutions) and end-to-end payment processing services.

The vast majority of our suppliers are located in Australia and the United States of America.

We procure card printing / packaging services from organisations in Australia and the United States of America. We also procure minimal card printing / packaging services from entities located in China. Our marketing and design partners are all located in Australia. Issuing and processing services including e-commerce partners (including payment processing) are located in Australia and Singapore. We have IT support partners in Australia, the United States of America and Israel, and one finance support person who we engage through a labour hire company in Hong Kong. Cleaning services are supplied by an Australian company, and our call centres are located in Australia and the Philippines. We also procure office equipment, IT equipment and other office supplies for our business, on an as needs basis.

Given the nature of our business, we have a fairly small supply chain with supply partners we have built a strong relationship with over a number of years.

3. Risk profile

InComm ANZ makes a conscious effort to procure goods and services from local organisations, where possible. In these instances, InComm ANZ has assessed the risk of modern slavery as low.

Where this is not feasible, InComm ANZ seeks to obtain those goods or services from overseas. The vast majority of overseas suppliers engaged by InComm ANZ are suppliers that are already engaged enterprise-wide by our group through HTC subsidiary operations and with whom the InComm ANZ Group has had longstanding relationships. This provides us with greater oversight over the operations and supply chain of our supply partners who operate overseas and comfort that they operate ethically.

InComm ANZ has identified the following overseas suppliers as having a higher level of vulnerability based on the Global Slavery Index:

Country	Number of Suppliers	Level of Vulnerability ¹
China	2	46/100
Hong Kong	1	28/100
Israel	1	35/100
Philippines	2	66/100
Total	6	

¹ <https://www.walkfree.org/global-slavery-index/map/>

- Where InComm ANZ engages suppliers from a jurisdiction with a higher level of vulnerability, we seek to undertake additional due diligence on those suppliers.
- Other than the suppliers referred to above, InComm ANZ has identified that the majority of our goods are acquired from countries considered to have a lower level of vulnerability. We have used the Global Slavery Index to classify them below:

Country	Number of Suppliers	Level of Vulnerability
Australia	19	7/100
USA	4	25/100
Singapore	2	24/100
Total	25	

The goods and services that we procure from these countries are also deemed to be lower risk. They include design and marketing services, IT support, e-commerce and payment processing.

4. Actions taken by InComm ANZ to assess and address these risks

4.1 Assessing risks

InComm ANZ continues to adopt processes and procedures to assess the risk of modern slavery including through a comprehensive process of risk mapping its operations and supply chain regularly. We consider the risk of modern slavery when making operational decisions and during the process of onboarding of new suppliers.

4.2 Addressing risks

InComm ANZ takes modern slavery risks seriously.

InComm ANZ has a well-documented Whistleblower Policy which upholds accessible and established channels for whistleblowers across the InComm ANZ Group to identify and raise concerns including modern slavery risks. Our policy contains details of how we investigate and manage any complaints and provides our personnel with an anonymous mechanism through which to raise concerns. Our personnel are made aware of the Whistleblower Policy and understand that they can safely and confidentially flag any perceived or actual modern slavery risks as they may arise within the InComm ANZ Group.

Importantly, InComm ANZ also maintains a continuous focus on training and collaboration to improve on the knowledge and awareness amongst our personnel. All InComm ANZ personnel undergo annual compliance and security training, which now includes training on modern slavery, human trafficking and forms of forced labour to raise awareness and mitigate risk.

We are also in the process of carrying out the following activities to enhance the manner in which InComm ANZ addresses modern slavery risks in our operations and supply chain:

- **Supply and distribution agreements**

InComm ANZ is in the process of incorporating language into its supply and distribution contracts to reflect its expectations of the supplier in respect of human rights and ethical procurement.

- **Supplier Code of Conduct**

InComm ANZ plans to develop a Supplier Code of Conduct to be issued to all new suppliers during our onboarding process, regardless of the nature of product/service being provided, size of supplier or spend. InComm ANZ will encourage and expect all our suppliers (existing and new) to establish and maintain appropriate standards to ensure alignment with this Code.

- **Modern Slavery Policy**

InComm ANZ is continuing to develop its modern slavery policy that will ensure all employees, contractors, subcontractors and consultants working for InComm ANZ demonstrate a commitment to mitigating and responding to modern slavery risk.

4.3 Remediation process

As outlined above, InComm ANZ has a confidential whistleblowing process that directors, officers, employees, contractors and subcontractors are encouraged to use to report any policy violations including modern slavery incidents or risks. If InComm ANZ or any member of the InComm ANZ Group becomes aware of a modern slavery risk in its operations or supply chain, all relevant steps are taken to adequately address this risk.

These actions will vary dependent on the type of risk, and may include investigating the alleged modern slavery conduct or risk, informing or educating the supplier, requiring the supplier to undertake remedial action, or terminating the supplier relationship.

5. How InComm ANZ assesses the effectiveness of our actions

InComm ANZ is determined to improve its response to modern slavery and wishes to identify, in a meaningful and quantifiable way, whether the actions it is taking have been effective.

We monitor the effectiveness of the established processes to inform, and if necessary, alter the direction of, our next steps in the pursuit of eradicating the modern slavery risks in our operations and supply chain.

InComm ANZ has internal processes in place to assess and report on the occurrence of any complaints or incidents should they arise under our Whistleblower Policy.

We also keep records of personnel attendance at all relevant training sessions which provides us with oversight of the proportion of staff that have been and are continually updated to understand and identify modern slavery risks.

Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery. We recognise that our practice in this space is ongoing

and evolving and we are committed to continually build on our practices to enhance our understanding of the effectiveness of actions taken by our organisation.

6. Consultation

This statement was developed with the input of the directors and key employees of the InComm ANZ Group.

The statement has been reviewed and approved by the Board of InComm Australia & New Zealand Pty Ltd (ACN 125 567 357).

7. Future activities

- (a) To enhance our due diligence process when we onboard suppliers, we intend to roll out a 'supplier questionnaire' in the next 12 months which will be given to all new suppliers as well as existing suppliers.
- (b) As mentioned above, we are in the process of implementing a Modern Slavery Policy which will form part of our wider personnel training processes to enhance awareness and set our expectations with respect to mitigating modern slavery risks.

Signed,



Michael Georgiadis, Director
InComm Australia & New Zealand Pty Ltd