



citadel group

Modern Slavery Statement

FOR THE FY22 REPORTING PERIOD

December 2022



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01.

SUMMARY



Citadel's Modern Slavery Summary



A world-class health & enterprise software and technology services company with operations in Australia and the UK

Citadel continues to work on improving and enhancing its modern slavery program and has focused its efforts this reporting period on strengthening and enhancing our activities around four key activities:

- 1. Risk identification:** including continuing to draw supply chain data from financial systems and verifying and categorising the underlying use and nature of goods;
- 2. Risk assessments:** including assessing any new or revised publicly-available supplier statements compared to the prior analysis period, analysing NGO data on key suppliers and issuing and assessing supplier self assessment questionnaires;
- 3. Mitigation action:** including incorporating our Supplier Code of Conduct into our purchase order terms and conditions and conducting open source intelligence gathering; and
- 4. Education and resources:** including establishing a cross-divisional working group to develop approaches to risk management and roll out awareness training programs to staff whose activities relate to procurement, and establishing a Modern Slavery Resource Centre for Citadel's Australian employees.

Citadel has assessed its risk of modern slavery to be low, but we acknowledge that Modern Slavery risks exist in our supply chain. In particular, as we have increased in size, new suppliers have joined our network. This necessitates and expanded program to incorporate those new suppliers.

Citadel's Modern Slavery Summary



The most distant, but higher risks, arise in the supply chains of the manufacturers of electronic equipment that Citadel purchases for its own operations, or that we procure for our clients directly from manufacturers. Due to the nature of these risks (and the depth within the supply chain at which they arise), Citadel has sought to use the strategies listed on the previous page to gain greater visibility over these distant-tier suppliers. In particular, we have reviewed the modern slavery protocols of all the major suppliers whose products we use, and engaged a third party consultant to validate that those protocols are working in the intended manner. We will continue this level of monitoring of second, third and deeper tier suppliers. Citadel's more proximate, but lower risks, arise in the cleaning and facilities management businesses that service our leased premises in Australia and the UK.

New activities undertaken in the period

Having engaged with our major Tier 1 suppliers in prior years, we have this year engaged with Genie's key Tier 1 suppliers and received responses from all of them in relation to our modern slavery questionnaire. Where we were not satisfied with the level of disclosure provided, we engaged with these suppliers to seek further clarification. Where we believed the perceived risk profile was increased by the lack of an effective risk management framework, we have continued to work with these businesses to ensure they implement these. In addition, we have 98% uptake of our Supplier Code of Conduct through our purchase order terms and conditions.

We note that within our own operations 98% of staff are on permanent employment contracts, the remaining 2% are comprised of contractors we periodically engage from Australian organisations. Given the highly skilled nature of our contractors, we have no reason to believe they are not paid fairly and properly for the work they do.

With regard to education, we ensure that all employees who participate in procurement activities undertake the training each year and this training is available to all employees and has historically been well-received and completed by all staff.

Citadel seeks to continually improve its approach to Modern Slavery to ensure it is achieving its goal of keeping our supply chain safe and free from Modern Slavery.



02.

WHO WE ARE

Who we are



An international health & enterprise software and technology services company with operations in Australia and the UK

- ~540 Employees in Australia
- ~197 Employees in the UK
- Revenue >A\$100,000,000

Citadel is a global software and IT services company specializing in health solutions and enterprise records management.

Since the last reporting period, Citadel has expanded further in Australia through the acquisition of Genie Solutions Group Pty Limited (**Genie**). Genie is a world-class medical specialist Practice Management System (**PMS**) software vendor headquartered in Brisbane, Australia.

As a consequence of the Genie acquisition and our ongoing corporate simplification process, users of this and previous statements will notice a change in the group's corporate structure and the number of included entities. Aside from this, the group's overall operations remain materially unchanged from its FY21 statement.



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03.

STRUCTURE AND OPERATIONS



Citadel structure and operations



Operating companies

- The Citadel Group Pty Limited is the key operating company in the Citadel group. With its registered office in Melbourne and key office presences in Canberra and Brisbane, it contracts directly with some customers, and is the direct or indirect owner of all Citadel's divisional operating entities other than Genie. In addition to its professional offices, one of Citadel's subsidiaries has warehouses in the ACT, Victoria and South Australia.
- Genie is headquartered in Brisbane, with regional sales teams across Australia. Since January 2022, these regional teams have progressively started using the existing Citadel offices as bases for their client interactions.
- The Wellbeing Software group, headquartered in Mansfield in the UK, serves the group's UK and European Health client base and supports the Australian group's EMEA activities.
- A complete group structure chart is in Appendix 1.

Statement scope

- This Statement is made on behalf of the group's ultimate holding company - Pacific Group Topco Limited, and its subsidiary companies set out in Appendix 1. In this report we refer collectively to the group as 'Citadel'.
- This Statement is made for the period 1 July 2021 to 30 June 2022.



Citadel structure and operations



Citadel is arranged in five business divisions, with one shared services corporate centre



Citadel Health



Health Procurement

- Citadel Health is primarily a people business, using its talent to maintain, develop and implement its products in Australia, the UK and Europe. Operationally, Citadel Health (**Health**) is responsible for its own supply chain activities. In respect of goods and services sold, this involves acquiring:
 - computer hardware from Australian vendors for installation at customer premises;
 - telecommunications services from Australian and UK telecommunications service providers;
 - Australian and UK private cloud data centre services;
 - physical security services from local companies; and
 - cloud storage and cloud software services from Australian subsidiaries of major US cloud service providers.
- In respect of other activities, Health procures:
 - employee education services;
 - marketing services (conferences etc);
 - travel and accommodation services (travel agent, flights, car hire and hotels); and
 - contracts with specialist service providers (fax and sms message services, helpdesk software and development software licences).
- Health also uses Citadel Shared Services.

Health Operations

- > Health primarily contracts through Citadel Health Pty Ltd.
- > Health is a software owner and developer, and a managed service provider in the health technology field.
- > Health's key software products are CHARM® and Auslab™, including its next generation product Evolution vLab® and eQstats®. Approximately 128 people work in the Health business, primarily in the Brisbane and Melbourne offices. These are predominantly permanent employees whose employment agreements comply with all applicable Australian laws and exceed any relevant award rates.

Wellbeing Software



Wellbeing Procurement

- > Operationally, Wellbeing Software (**Wellbeing**) is responsible for its own supply chain activities. In respect of goods and services sold, this involves acquiring:
 - computer hardware from UK vendors for installation at customer premises;
 - telecommunications services from UK telecommunications service providers;
 - UK private cloud data centre services;
 - physical security services from local companies;
 - cloud storage services from US parent vendors with operations in Europe; and
 - cloud software services from US parent vendors with local operations.
- > Wellbeing also acquires the Evolution vLab® product and support from Citadel Health in Australia.
- > In respect of other activities, Wellbeing procures:
 - employee education services;
 - marketing services (conferences etc);
 - travel and accommodation services (travel agent, flights, car hire and hotels); and
 - contracts with specialist service providers in Australia (fax and sms message services, helpdesk software and development software licences).
- > Wellbeing also procures many of the services for local consumption that Citadel Shared Services provides to its Australian affiliates.

Wellbeing Operations

- > Like the rest of the Health and Genie divisions, Wellbeing is driven by its professional staff to support, develop, implement and manage its health technology products.
- > Wellbeing contracts through Wellbeing Software Limited; Euroking Maternity Software Solutions Limited; E-Health Innovations and Apollo Medical Software Solutions Limited.
- > Health's key software products are CRIS® & CRIS® Connect, Euroking, Stratus and Apollo. It is also a licensed provider of Evolution vLab®.
- > Approximately 197 people work in the Wellbeing business, primarily in the Mansfield and Sunderland offices. These are almost exclusively direct employees whose employment agreements comply with UK employment and other requirements.

Genie Solutions



Genie Solutions Procurement

- > Genie and its operating subsidiaries are in a transition state, moving from their own procurement to use of the Citadel Shared Services division. Where Genie is responsible for its own supply chain activities, this involves acquiring:
 - software development services and software consultancy services from local companies;
 - operational support services from local Australian and international vendors;
 - telecommunications services from Australian telecommunications service providers; and
 - cloud storage and software licences and services from US parent vendors with operations in Australia.
- > In respect of other activities, Genie procures:
 - leasing and cleaning services for its office in Brisbane;
 - computer hardware from Australian vendors for internal use;
 - employee education services;
 - marketing services (conferences etc);
 - travel and accommodation services (travel agent, flights, car hire and hotels); and
 - contracts with specialist service providers (sms message services, helpdesk software and software licences).
- > Genie also used Citadel Shared Services.

Genie Operations

- > Genie is a software owner and developer, and cloud 'software as a service' provider in the health technology field.
- > Genie's operating subsidiary - Genie Solutions Pty. Ltd. - contracts directly with medical specialists and their practices to supply its locally-installed Genie[®] Practice Management Software (PMS) and its cloud-based PMS, Gentu[®].
- > Genie uses software frameworks developed in Europe and has one transactional support arrangement with an organisation based in the Philippines.
- > Approximately 162 people work in the Genie office in Brisbane, with a further 19 employees working across Australia. These are almost exclusively permanent employees. All permanent Genie employees are paid above relevant award rates and have employment agreements that meet Australian legal requirements.

Citadel Enterprise Solutions



Enterprise Operations

- > The primary trading entities in Citadel's Enterprise Software division (**Enterprise**) are Citadel, Gruden Pty Ltd (**Gruden**) and Kapish Services Pty Ltd (**Kapish**). Enterprise is primarily a software, SaaS and PaaS business, supported by some professional technology services. It develops and maintains its own software that operates either independently, or as part of other software packages. Good examples of our proprietary Enterprise software are the Kapish® Productivity Suite, and goTrimPro™, both of which provide productivity enhancements to a third-party product, Micro Focus Content Manager (**Content Manager**). Support and maintenance is also provided for its own and third-party licensed products.
- > Kapish also operates a market-leading secure cloud platform for Micro Focus Content Manager – Kapish Content Manager Cloud. Kapish can deliver Content Manager Cloud in a number of combinations to suit the customer's needs, but common services include establishing the cloud instance, setup or migration of Content Manager to the Cloud, as well as Content Manager training.
- > Gruden has historically specialized in the creation and maintenance of products, like AusTender and GrantConnect. Gruden also contracts with certain government panel members to supply services within the specialties of its related companies, like JBS.
- > Approximately 57 members of the Citadel team work in Enterprise Solutions and in common with their colleagues in the other divisions, are rewarded and paid in accordance with all applicable employment laws and awards.

Enterprise Procurement

- > Operationally, Enterprise is responsible for its own supply chain. This involves the following typical acquisitions:
 - cloud storage services;
 - onshore and offshore programming and coding services;
 - software for resale;
 - software components;
 - graphic design services;
 - contract professional services; and
 - uniform and promotional materials.
- > With the consent of Enterprises' clients, some coding services from carefully selected suppliers based in Hong Kong, China and Vietnam are utilised.
- > Cloud services are procured from US vendors or their local subsidiaries, using services located in Australia.
- > Software is primarily licensed from the US and Europe.
- > Enterprise also procures travel and accommodation services (travel agent, flights, car hire and hotels), and uses Citadel Shared Services.

Professional Services

Citadel Technology Procurement

- > Citadel Technology (**Citadel Tech**) is one of two elements of the Professional Services division.
- > Citadel Tech's key trading entity is Citadel Technology Solutions Pty Ltd. Operationally, Citadel Tech is responsible for its own supply chain activities. In respect of goods and services sold, this involves acquiring:
 - software licensing for video and audio conferencing;
 - audio-visual hardware (screens, projectors, speakers, microphones, computing hardware, switchgear etc), from local suppliers, sourced from global manufacturers;
 - cabling, connectors, brackets & other ancillary hardware required for audio-visual equipment;
 - vehicles for delivery of goods and transport of technicians;
 - qualified trades people for project or longer-term engagements;
 - warehousing and storage services; and
 - uniforms and promotional materials.
- Citadel Tech also procures travel and accommodation services (travel agent, flights, car hire and hotels), and uses Citadel Shared Services.



Citadel Technology Operations

- > Citadel Tech's key business operations are the design, supply, installation, maintenance and servicing of audio visual and video collaboration technologies across its key verticals of higher education, defence, health, and government.
- > Approximately 70 people work in the Technology operations of the Professional Services business, with the Citadel Tech team operating primarily from Melbourne and Adelaide. All Citadel Tech employees are retained on contracts compliant with Australian law, and are remunerated in accordance with applicable awards.

Professional Services

Citadel People and Noventus

- > The primary trading entities in Citadel's Professional Services division are The Citadel Group Pty Limited, Jakeman Business Solutions Pty Ltd (**JBS**), Noventus Pty Ltd (**Noventus**) and filosofh-e Pty Ltd (**filosoph-e**).
- > Professional Services provides specialist consulting and personnel services directly or indirectly to Australian government agencies and Australian corporations. Citadel also provides certain managed services to the Australian government. These services align with Citadel's core business concerning secure information management. Professional services contractors are sourced from within Australia.
- > The eleven members of the Professional Services team operate from Melbourne, Brisbane and Canberra.



Citadel People Procurement

- > Operationally, Professional Services is responsible for its own supply chain. This involves the following typical acquisitions:
 - contract professional services from Australian contractors; and
 - uniform and promotional materials.
 - Professional Services also procures travel and accommodation services (travel agent, flights, car hire and hotels), and uses Citadel Shared Services.

Shared Services



Shared Services Procurement

- > Citadel's Shared Services division is responsible for procurement on its own behalf, and indirectly for other divisions that use its services. Approximately 52 people work in Shared Services. This involves the following typical acquisitions:
 - employee benefits program expenses;
 - recruitment services;
 - marketing services (corporate website) and corporate functions;
 - investor management services (including share registry management);
 - travel and accommodation services (travel agent, flights, car hire and hotels);
 - professional services (non-executive director fees, audit, tax, external legal, other consultancy services);
 - specialist cloud software services and security operations;
 - enterprise software licensing;
 - accommodation services (leasehold property) including fitouts;
 - utilities (commercial rates; heating, cooling, data connectivity and voice, water and sewerage; cleaning (although some cleaning is conducted by landlords);
 - postal and courier services;
 - archiving and secure document destruction;
 - security and alarm services;
 - computer hardware (laptops, desktops, mobile devices, printer/copier leases);
 - tea, coffee, catering, (including vending machines); and
 - office supplies.
- > These services are predominantly obtained through Australia-based suppliers, though in the case of certain services, the goods are sourced from overseas manufacturers based in China, Malaysia and Vietnam.

Shared Services Operations

- > Shared Services describes three parts of Citadel's business.
- > The first is the Office of the CEO and the Board. This element of Shared Services manages the group's relationship with its owners (the shareholders), and the activities of its governing body (the Board of Directors of Pacific Group Topco Limited).
- > The second is the Corporate Centre, which means the shared services that support the other business units. This includes people & culture, finance, legal, audit, risk and compliance, security operations, property management, and corporate IT. In this Statement, we refer to the second category of services as Citadel Shared Services. Except for Genie employees, all of Citadel's employees and direct contractors are employed through Citadel Group Services Australia Pty Ltd.
- > The third part of Citadel Corporate is customer facing. Because of the structure of many government panel and procurement arrangements, The Citadel Group Pty Limited is a contracting party providing services to customers. It does not provide these services itself, but does so through its operating subsidiaries described above.



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04.

PREPARING OUR STATEMENT



How this statement was prepared



Corporate authorisations

- > Under its Constitution and Shareholders Deed, Pacific Group Topco Limited's Board of Directors is ultimately responsible for Citadel's management, and by virtue of its ability to control the boards of each of its subsidiaries, it is able to influence the conduct of activities by the subsidiaries.
- > The Board of Pacific Group Topco Limited and each of its wholly-owned subsidiaries have supported the cooperative engagement by entities covered by this Statement in the processes and activities it describes. There is effectively one management team across each of the UK and Australian businesses, simplifying the group's Modern Slavery activities. In addition, Filosoph-e Pty Ltd's Board has separately consented to the preparation and approval of this Statement, and to participate in the activities it describes.*

Activities

- > The Group Company Secretary, with assistance from area specialists, has managed the process of preparing this Statement.
- > Due diligence activities have included:
 - > drawing supply chain data from financial systems;
 - > verifying and categorizing the underlying use and nature of goods;
 - > assessing any new or revised publicly-available supplier statements compared to the prior analysis period;
 - > analyzing NGO data on key suppliers;
 - > issuing and assessing supplier self-assessment questionnaires;
 - > conducting open-source intelligence gathering on risk-rated suppliers; and
 - > engaging consultants to assist in development activities.

* After the end of the Statement period, but before approval of this Statement, JBS acquired the remaining 50% of Filosoph-e Pty Ltd and the subsidiary is now fully integrated into the group's structure.



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05.

MODERN SLAVERY RISKS IN OUR
SUPPLY CHAIN



Modern Slavery risks in our operations & supply chain



Risk identification

- > Citadel’s software development, professional services, consulting and advisory operations are conducted through the personal efforts of our own professional and trade-trained Australian and UK employees and some specialist contractors.
- > Following the acquisition of Genie, the number of overseas-connected suppliers has increased. One of these suppliers have operations in a Tier 2 and Tier 2 Watch list country. We have engaged with these suppliers following a self-assessment questionnaire and are satisfied that the services we acquire are unlikely to be exposed to Modern Slavery.
- > For those team-members working on-site, we procure for them office space, communications and technology devices, and associated office-related products and services including cleaning, catering and beverages such as tea and coffee. Some contractors and employees work at client sites, and clients are responsible for some of these services.

- > Modern Slavery risks exist in Citadel’s supply chain. These risks can be geographically distant in nature, or very close to home.
- > The most distant, but higher risks arise in the supply chains of the manufacturers of electronic equipment that we purchase for our own operations, or that we procure for our clients directly from manufacturers or from distributors. These are third, fourth or even greater tiers in the supply chain, and assessment of these exposures is difficult. However in the reporting period, we have sought to develop strategies to gain greater visibility over these distant-tier suppliers.
- > The more proximate, but lower risks arise in the cleaning and facilities management businesses that service our leased premises in Australia and the UK. These service providers are primarily second tier suppliers, engaged by landlords, but in some instances, they are engaged directly by group companies.
- > Citadel has identified in Appendix 2 the key risks of Modern Slavery facing the group. Citadel has also identified the key business unit or subsidiary with the most direct connection to these risks, and the “UN Guiding Principles” categorization in terms of causation, contribution and direct linkage.

Modern Slavery Risks in our supply chain



Risk Assessment

Departmental Guidance

- > In assessing its Modern Slavery risks, Citadel continues to have reference to Table 6 of the Guidance for Reporting Entities issued by the Australian Department of Home Affairs (**Guidance**), and the Department's supplementary guidance.

NGOs

- > Citadel has examined the latest reports from key NGOs involved in its higher-risk supply chain areas, specifically the 'Know the Chain' [2020/2021 Benchmark Study of ICT Companies](#) and the specific assessments by KTC of Tier 2 or in some cases Tier 3 technology suppliers to the group. Citadel has also had reference to labour exploitation analyses from NGOs such as the Walk Free Foundation. We have also referred to the United States Department of State Trafficking in Persons Reports for 2021 and 2022 in conjunction with our new self-assessment questionnaire template and risk scoring system.

Supplier self-assessment questionnaires

- > The company issued a number of supplier self-assessment questionnaires over the period and conducted analysis of its results for further enquiries. The Company has trialed a new format questionnaire in an effort to surface deeper supply chain risks and has developed a scoring methodology to help identify high-risk suppliers.

Supplier Modern Slavery Statement

- > The requirement for a number of Citadel's suppliers to provide Modern Slavery Statements has assisted Citadel in assessing the approaches to addressing Modern Slavery of its larger suppliers.

Modern Slavery Risks in our supply chain



Actions taken

Reinforce awareness

- > Modern slavery awareness training continues as a feature of the group's mandatory annual training. In the period, Citadel conducted a training refresh with a scored assessment to keep content engaging, but has noted a drop in employee engagement with this content. Citadel is assessing if this is format-related or content.

Supplier rating and engagement

- > Citadel has received responses from four additional tier 1 suppliers providing either higher risk goods and services, or located in higher risk countries. These suppliers varied from local cleaning companies through to professional services firms. Some tier 1 supplier responses omitted required detail, and required additional engagement. In some, the perceived risk profile was increased by the lack of an effective risk management framework in those suppliers. These are the subject of further enquiries in FY23.

Implementation of Supplier Code

- > Citadel's Supplier Code of Conduct incorporated through its Australian Purchase Order Terms and Conditions was used in almost 98% of FY22 purchase orders.

Supplier monitoring

- > In the period, Citadel in partnership with its Modern Slavery consultant, has implemented a new active Supplier monitoring system using a combination of open source intelligence techniques to monitor distant-tier risk-weighted suppliers for Modern Slavery issues.

Modern Slavery Risks in our supply chain



Actions taken

NGOs

- > Pending updating from key NGO resources relating to ICT risks, Citadel has extended its NGO reporting to assess a wider range of Modern Slavery risks following the expansion of its supply chain. This includes country-specific risks as well as high-risk goods.
- > As mentioned on the previous page, Citadel has collaborated with its key Modern Slavery Consultant to implement a supplier monitoring system using open-source intelligence gathering techniques across a number of public information assets. These results are the subject of regular reporting and for the relevant period, no negative reports were received.

Systems and Intelligence

- > As explained in previous Statements, Citadel's highest risk areas relate to its ICT supply chain. Although the equipment it purchases for its own use come from suppliers with superior Modern Slavery postures, client-purchased equipment is more difficult to manage, especially where country-of-origin for goods can vary. Nonetheless during the period, Citadel has sought to implement a 'country of origin' program in its customer inventory and ordering system (ERP) in order to more clearly identify the actual origin of these goods and more accurately judge the Modern Slavery risk.

Strategy

- > Citadel has executed on two elements of its Modern Slavery Strategy in the period: ERP inventory tracking and source of supply validation. Citadel has also implemented a Modern Slavery assessment program during supplier on-boarding. Ambitions for FY23 include formalising this system across the business and improving internal communications on Modern Slavery.



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06.

REMEDIATION



Remediation and assessment – FY21



These were the key metrics identified in our FY22 Modern Slavery Statement and how we performed against them

Awareness – working group

- > Citadel established a cross-divisional working group to develop approaches to risk management. The work of this group has been challenged by various work and environmental factors, and will be reinvigorated in FY23.

Awareness – training

- > Updated training was introduced for FY22 and this has not resulted in an improvement over the previous in-house developed training. This will be reviewed in FY23.

Development of Modern Slavery Resource Centre

- > A centrally-accessible resource centre has been developed that is open to all Citadel Australian employees. This contains resource and information about Modern Slavery, including links to additional information. This is highlighted in the compulsory training. The ambition is to make this available to the UK and Genie entities in FY23.

Supplier monitoring

- > Supply chain monitoring using open-source intelligence gathering tools has been developed and is being used to actively monitor modern slavery and other governance risks in the group's deeper supply chain.

Supplier engagement

- > Citadel actively engaged with four additional tier 1 suppliers in the high-risk categories. Newer simplified questionnaires were adopted with these suppliers, which resulted in improved response times but did not always improve the data quality. This will be a focus of improvement in FY23.

Remediation and assessment – FY23



These are the key metrics we intend to assess for FY22

Awareness – training refresh

- > Citadel will reassess the effectiveness of its training and determine if a new format, content or approach is required to improve this aspect of the Modern Slavery challenge.

Direct action

- > Citadel will develop initiatives to create direct engagement with its more distant domestic supply chain, and to highlight the availability of reporting modern slavery concerns directly to Citadel.

Supply chain monitoring

- > Citadel will continue its high-risk supplier open-source monitoring.

Risk Assessment

- > The new risk assessment methodology will be refined and developed further to improve the accuracy of risk identification.

Supply Chain Transparency

- > Citadel will select an appropriate supply chain reporting tool to improve the reporting of its supply chain activities to its own customers.



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07.

APPROVAL



Approval



This Statement was approved on 15 December 2022 by the Board of Directors of Pacific Group Topco Limited on its own behalf and on behalf of each of the entities identified in Appendix 1.

A handwritten signature in black ink, appearing to read 'Mark McConnell', with a long horizontal flourish extending to the right.

Mark McConnell

CEO and Director

Pacific Group Topco Limited

4/90 Collins Street
Melbourne VIC 3000
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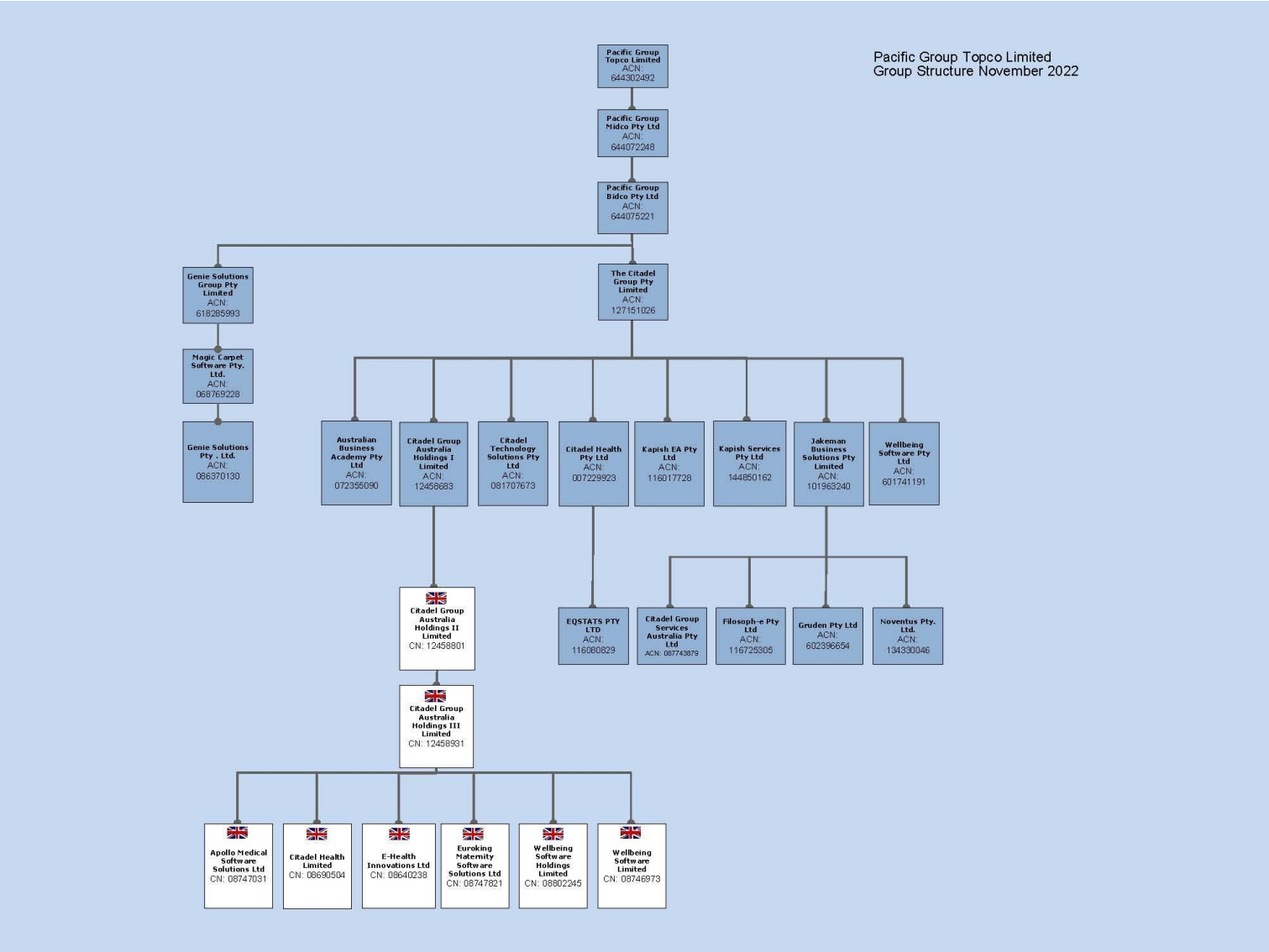
Appendix 1

CITADEL GROUP STRUCTURE

Group Structure



Citadel group structure at the end of the reporting period.



Citadel Brands





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Appendix 2

CITADEL SUPPLY CHAIN RISKS

Citadel Key Supply Chain Risks



Risk #	RISK	PROXIMITY	BUSINESS	LINKAGE	DESCRIPTION
1	Extractive industries	Indirect	Citadel Tech Corporate Citadel Health Wellbeing Genie	DL	The: <ul style="list-style-type: none"> • AV technology products Citadel Tech procures for its customers; • computing devices (mobile and static) that Citadel Corporate and Wellbeing procures for its for its own use; and • the computing devices used by the cloud service providers used by Citadel Knowledge and Citadel Health, each rely on extractive industries for key components.
2	Debt Bondage	Indirect	Citadel Tech Corporate Wellbeing Genie	DL	The products identified above may be sourced from countries such as Malaysia, where there is potential for migrant labourers to be coerced or induced into debt-bondage arrangements in production facilities.
3	Labour Exploitation	Indirect	Citadel Tech Corporate Wellbeing Genie	DL	The products identified above may be manufactured in factories in China where owners make extensive use of unpaid 'interns' under vocational training regimes.
4	Labour Exploitation	Indirect	Citadel Tech Corporate Citadel Health Wellbeing Genie	DL	The goods above and more generally are shipped to Australia and the UK. Although Citadel has no visibility over shipping lines used there is a risk of shipment using ships registered under 'flags of convenience'. These vessels frequently have low labour standards and crew members cannot leave ships in foreign ports without permission or face the risk of immigration detention.
5	Textiles	Indirect	Citadel Tech Enterprise Corporate	DL	Citadel purchases small numbers of articles of clothing for staff use – mainly in promotional situations such as trade shows and while required under customer contracts. These may be sourced from countries such as Bangladesh, India, Pakistan and China, countries which have documented risks of child and forced labour.

Citadel Key Supply Chain Risks



Risk #	RISK	PROXIMITY	BUSINESS	LINKAGE	DESCRIPTION
6	Labour exploitation	Indirect	Citadel Tech Corporate Citadel Health Wellbeing Genie	DL	Through its landlords, and in some cases directly, Citadel and Wellbeing consume cleaning and facilities maintenance services, sectors which (notwithstanding clear and strong labour laws in each country), rely in some cases on recent migrants to Australia and the UK, who can be vulnerable to exploitation.