

Modern Slavery Statement
For the year ended 30 September 2022
Gentrack Group Limited

This statement is made on behalf of Gentrack Group Limited ("Gentrack" and together with its subsidiaries, the "Gentrack Group") for the financial year ending 30 September 2022. It has been prepared pursuant to the requirements of the Australian Modern Slavery Act 2018.

This statement was approved by the Gentrack Group Limited Board (including its subsidiaries) on 28 March 2023.



Andy Green, CBE

Chairman

Introduction

Gentrack is a global software and services business with operations and customers across Europe, North America, Middle East and Asia-Pacific. We are committed to the value of human rights and ensuring that all business is conducted according to ethical, professional and legal standards in a fair, honest and open manner.

The Gentrack Group has a commitment to conduct its business and all its relationships based on integrity and respect.

Our Business

For the financial year ending 30 September 2022 Gentrack was a New Zealand public company limited by shares and listed on the New Zealand Stock Exchange (NZX) and Australian Stock Exchange (ASX). A New Zealand incorporated company, its principal corporate office is in Auckland New Zealand with corporate offices during the reporting period in other countries including London, United Kingdom and Melbourne, Australia.

Gentrack owns various subsidiary companies including:

Gentrack Limited (New Zealand)

Gentrack Group Australia Pty Limited (Australia)

Gentrack Pty Limited (Australia)

Gentrack UK Limited (United Kingdom)

Gentrack Holdings UK Limited (United Kingdom)

Gentrack (Singapore) Pte Ltd (Singapore)

Gentrack Private Software Limited (India)

Veovo Group Limited (New Zealand)

Veovo Holdings Denmark (Denmark)

Veovo AS (Denmark)

Veovo Inc (United States of America)

Veovo NZ Limited (New Zealand)

Veovo UK limited (United Kingdom)

Veovo IP Limited (New Zealand)

CA Plus Limited (Malta)

Evolve Analytics Limited (not trading)

Evolve Parent Limited (not trading)

Our Operations

Gentrack provides leading utilities across the world with innovative cleantech solutions. Our main business activities include billing, CRM, collections and meter data management solutions for energy, water and airport utility companies and software to enable airports to run more efficiently.

We employ over 600 people worldwide who are predominantly utility software experts. The majority are employed in New Zealand, Australia, India and the United Kingdom.

The services we procure are predominantly provided in New Zealand, Australia, UK & Europe and the goods we procure are manufactured across the world including the United States, Europe and Asia.

Our supply chains

Our supply chain relationships include suppliers from the following sectors:

- (a) information, communications and technology;
- (b) property services (including facilities management, utilities, cleaning, waste management and security);
- (c) consulting and contracting services;
- (d) marketing including print and marketing services; and
- (e) office supplies

Our values, policies and governance

Our values drive decisions and how we interact with our customers, partners, shareholders and each other.

We have a policy framework in place that is designed to incorporate the Gentrack Group values and commitments. A Gentrack Group Anti-slavery and human trafficking policy was introduced in 2019. It includes the following commitments:

The Company, through its recruitment programme and people management activities, has processes in place that are designed to prevent and detect modern slavery and human trafficking. The Company's programme in this regard contains the following elements:

- (a) A policy which articulates the Company's commitment to preventing violations of the Modern Slavery Act 2015 within its operations and supply chain, being this Policy;
- (b) Communication of this Policy and all relevant elements of the programme to all employees throughout the Company and to our business partners and supply chain;
- (c) The assessment of modern slavery and human trafficking risks within the Company and its supply chain and the development of effective, efficient and transparent controls to reduce exposure to those risks;
- (d) The adoption of appropriate due diligence on business partners, agents, contractors, consultants, subcontractors and suppliers coupled with a requirement to incorporate the principles of the Modern Slavery Act 2015; and
- (e) Training of all relevant individuals throughout the company so that compliance with its policies and procedures is a duty of all relevant employees at all levels and so that individuals can recognize and take steps to report and avoid the same.

While this policy was introduced in response to the UK Modern Slavery legislation it applies to all directors, officers and employees of the Gentrack Group.

In addition to the Policy there is a Code of Conduct which serves as a guide for how Gentrack Group people conduct themselves in all aspects of their business.

Other complimentary policies include:

- Risk Management Policy
- Health and Safety Policy
- Contract Management Policy

Risk Assessments

We have a zero tolerance approach to all forms of modern slavery and human trafficking within our business. Accordingly risk assessments have identified the following areas that may pose risks:

Labour risks

These include violation of labour rights, including forced or compulsory labour, inadequate wages and benefits, excessive work hours and use of child labour

In response to this mitigations include:

- A remuneration policy and governance framework which ensures equitable wages and benefits for all Gentrack Group employees
- Ensuring contracted labour is paid in accordance with industry benchmarks in the relevant location
- A contractual requirement on third parties to comply with all relevant legislation

Product and services risk

While services are considered to be a low risk area for Gentrack Group, due diligence and on-going monitoring of supplier practices to identify any areas of concern is undertaken as part of our customer engagement model.

It is acknowledged that supply chains are far reaching and therefore visibility is not possible over all areas which may involve modern slavery risks however we incorporate environmental, social and ethical considerations into our supplier selection process.

Effectiveness of our approach

The vast majority of our operations, people and customers are located in countries with strong labour, employment and anti-corruption legislation which means there is a lower risk of modern slavery than may otherwise be the case. However, we will continue to approach this with our zero tolerance approach and monitor and evolve policies and approaches as appropriate.

We continue to encourage direct dialogue with our colleagues and conduct bi annual engagement surveys for feedback. Monthly and Quarterly Business Reviews ensure effective and commercial financial management and risk reviews at a Group level to ensure good governance and compliance.

Gentrack Group is committed to taking meaningful action to identify, mitigate and manage any modern slavery risks and to continuously improving our approach.