

Modern Slavery Act Statement

Introduction

This statement is made by GBST Holdings Ltd ACN 010 488 874 ("GBST") pursuant to section 14 of the *Modern Slavery Act 2018* (the "Act").

GBST is committed to complying with all legal obligations including, without limitation, the Act and the Modern Slavery Act 2015 (UK). The purpose of this statement is to outline GBST's approach to addressing the risk of modern slavery in GBST's business operations and supply chain.

Business structure

GBST is a global software business servicing the financial services industry. GBST operates in Australia, the United Kingdom, Hong Kong, Singapore and the United States of America.

GBST's main operations relate to licensing its software products and providing implementation services, customisation services, managed services, support services and consultancy services to its customers. There are also corporate functions including sales, marketing, human resources, finance and legal.

GBST's supply chain is mostly focused on: (a) the procurement of technology to be on sold to customers (software, hosting and cloud services); or (b) embedding or using such technology in conjunction with products; or (c) using the procured technology to assist GBST in providing its products and services to customers; and (d) procuring software development services from offshore.

Risk Identification, Management and Due Diligence

As a software and services provider, GBST has assessed the risk and considers the risk of modern slavery within its operations and key supply chains to be low. Nonetheless, GBST has introduced the below measures to identify, assess, monitor and manage modern slavery risk areas.

➤ Modern Slavery Policy

GBST is committed to ensuring that there is no slavery or human trafficking in any part of its business. To this end, GBST has a Modern Slavery Policy, which reflects GBST's commitment to ensure that slavery and human trafficking does not take place anywhere within its business or supply chain. The policy is used to ensure that staff are aware of their obligations in relation to modern slavery and how GBST addresses modern slavery in its operations and supply chain.

➤ Suppliers

GBST has continued to review the potential risk of modern slavery practices across its supply chain taking into consideration factors such as location, industry and product/service.

In this reporting period, GBST focused on ensuring that any supplier agreements that were introduced, renewed or amended: (a) included GBST's standard modern slavery clauses; or (b) the Supplier satisfied GBST's modern slavery due diligence processes; or (c) the Supplier satisfied GBST's modern slavery questionnaire (collectively "GBST's Modern Slavery Supplier Standard").

GBST's supply chain continues to be the main area of focus in addressing modern slavery risk and GBST has implemented a process to ensure that prior to any engagement or continued engagement with a supplier, GBST's internal legal representatives liaise with the relevant GBST business division to confirm that GBST's Modern Slavery

Supplier Standard has been met. GBST is also comfortable in refusing to engage with suppliers that do not meet its Modern Slavery Supplier Standard and has done so in the past.

➤ Whistleblowing Policy

GBST's Whistleblowing Policy allows and encourages employees and contractors to raise concerns regarding modern slavery and human trafficking in a confidential manner using procedures outlined in the Policy. During the reporting period, there were no reports made in relation to modern slavery concerns.

➤ Training

GBST delivers a dedicated modern slavery training course to all new employees. Additionally, all new employees are required to read and acknowledge GBST's Modern Slavery Policy and Whistleblowing Policy as part of their induction process.

➤ Recruitment

GBST uses reputable recruitment partners across the globe when sourcing employees and contractors and recruitment agreements either contain GBST's standard modern slavery clauses or a due diligence process has been undertaken to ensure such compliance.

➤ Risk Management

As part of assessing its actions during this reporting period, GBST has chosen to re-evaluate the best role and/or team to be responsible for ensuring GBST proactively manages its modern slavery risks and assesses the effectiveness of its actions. This is mainly due to the fact that different types of suppliers in GBST's supply chain require assessment by different areas of GBST's business to identify and assess relevant risks.

Assessment of the effectiveness of actions

During the reporting period, GBST's focus was to continue to determine what modern slavery risks may exist within GBST's group operations and supply chains and to confirm appropriate action had been taken to address these risks. GBST determined that its operations continue to be low risk and that the primary risk exists within GBST's supply chains. To assess the effectiveness of GBST's actions in respect of its supply chain, GBST reviewed whether its Modern Slavery Supplier Standard had been applied to a selection of material supplier contracts. This review revealed that further refinements are to be implemented to the procurement process to remove any remaining gaps. The updated process will also cover the development of a framework to review and assess the effectiveness of GBST's actions.

Process of Consultation with entities the reporting entity owns or controls

GBST consulted the relevant companies it controls in the development of this statement. In preparing this statement there was engagement and feedback between key areas within the GBST group (including Legal, Human Resources, and the Technology departments).

This Statement was approved by Robert DeDominicis in his role as principal governing body of GBST on 20 October 2021.

Signed on 20 October 2021.



Robert DeDominicis
Chief Executive Officer
GBST Holdings Ltd | A.B.N. 85 010 488 874