



Modern Slavery Statement FY22

Date

1/11/2022

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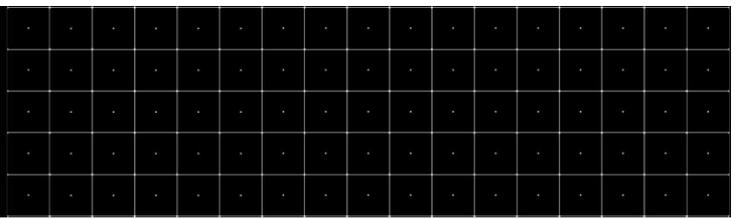


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Message from the CEO



I am pleased to present the second consecutive modern slavery statement of Nexon Asia Pacific Pty Ltd. ACN 095 335 023 (**Nexon**). This modern slavery statement covers the reporting period of 1 July 2021 to 30 June 2022 (**FY22**) and provides insight into the modern slavery risk profile of our operations and our supply chains and the actions that we have taken to identify such risk and to mitigate it as much as possible.

This reporting period coincides with a confluence of world events which continue the vulnerability of particular segments of the global workforce. Alarming, the International Labour Organisation's (**ILO**) latest estimates of modern slavery indicates that there are approximately 50 million people in situations of modern slavery on any given day.

Nexon is committed to the elimination of modern slavery in all forms throughout our operations and the mitigation of modern slavery risk in the tiers of our supply chains. We have increased our vigilance to ensure that the human rights of our personnel are upheld. We will conduct further due diligence of suppliers over the next several reporting periods to enact a more fulsome and positive impact across our supply chain.

We have taken greater stock of the modern slavery risk associated with the industry in which we operate and are resolved to advance our approach to modern slavery risk. As such, we have undertaken analysis of our operations and supply chains, due diligence of key industries of our suppliers and enacted training of our people to ensure that staff are empowered to identify and pursue the remedy of actual or suspected instances of modern slavery.

This modern slavery statement is to be read in conjunction with our Modern Slavery Policy (the '**Policy**') which has been separated into a standalone document for this reporting period and will remain as a key element of our governance framework for upcoming reporting periods.

I hope the actions that we have taken to identify, analyse and mitigate modern slavery risk in our operations and supply chain present an illuminating view of a key issue that is affecting businesses and society, and better inform your understanding of modern slavery and the responsibility that we have to mitigate its impact on the lives of the most vulnerable in our global society.



Barry Assaf

CEO

This statement was approved by the Board of Directors of Nexon Asia Pacific Pty Ltd and is signed on behalf of the Board by the Responsible Member noted immediately above.

FY22 in review



Area	Actions Completed	Page(s)
Policies and protocols	<ul style="list-style-type: none"> Reviewed, revised and published Modern Slavery Policy Reviewed and revised Whistleblower Policy and Procedure 	14 - 15
Due diligence	<ul style="list-style-type: none"> Conducted desktop due diligence on suppliers with an identified elevated level of modern slavery risk Reviewed current workforce to assess any potential indicators of modern slavery risk 	11 - 14
Grievances & remediation	<ul style="list-style-type: none"> Identified zero reports of modern slavery via our Whistleblower hotline Identified zero breaches of the Modern Slavery Policy and required zero Corrective Action Plans (CAP). 	15 - 16
Training and education	<ul style="list-style-type: none"> Initiated modern slavery training pilot program to 36 onboarded staff Implemented Go1 training software to prepare for company-wide rollout in the upcoming reporting period 	15 - 16
COVID-19	<ul style="list-style-type: none"> Continued hybrid working from home measures Offered support through Employee Assistance Program – external professional confidential support to address any issues. Conduct leadership workshops to educate managers on how to address mental health issues in workplace. Measured well-being in our engagement survey and the results are positive. Maintained consistent spend with existing suppliers to ensure continuity of suppliers 	17
Assessing effectiveness	<ul style="list-style-type: none"> Established baseline metrics to serve as a baseline to measure future performance Conducted a gap analysis against the last modern slavery policy and statement 	16
Collaboration	<ul style="list-style-type: none"> Engaged external modern slavery experts to assist with modern slavery analysis and reporting Preparing Go1 training software to rollout group-wide education modules 	16

About Nexon



Nexon Asia Pacific



Founded in 2000



Industry leader



750+ clients



490+ employees



Nine offices



**Dynamic partner
and trusted advisor**



**Providing solutions
for customers
across Government,
not for profit,
financial and
professional
services and retail
industries**



**Strategic Vendor
Relationships**

Nexon is an award-winning digital consulting and managed services partner for mid-market corporate and government organisations across Australia. We service a number of industries across the private and public sectors, including, healthcare, higher education, financial services, professional services and retail. As a certified and accredited local and state government provider, CREST and ISO-certified, Nexon partners with world-class technology vendors to deliver innovative solutions and service excellence.

Our end-to-end solutions help clients to solve problems, address frictions and accelerate growth. We have a uniquely broad suite of solutions to service clients who require end-to-end capabilities coupled with specialist expertise in security, cloud and digital solutions. Committed to the highest standards of responsiveness, competency and transparency, Nexon is built on a unique client care model that is fuelled by continuous feedback.

The Nexon Partner Program targets managed service providers, system integrators, Internet service providers, unique software vendors and consultants as resellers of Nexon's digital services product offering to their clients. The Partner Program allows these partners to scale and add variety to their existing service portfolio. They are able to facilitate more comprehensive solutions to their client's problems while retaining control of the offering and the client relationship. We also offer our partners a serviced data centre solution built on reliable infrastructure and years of experience which reduces the drain on their financial assets and operational resources to build an enterprise owned solution.

With over 50 staff, we employ some of the country's most experienced consultants and empower teams to make decisions that accelerate change for client organisations. We help our clients move from a position of overwhelm to empowerment, looking forward to a more agile and digital future.

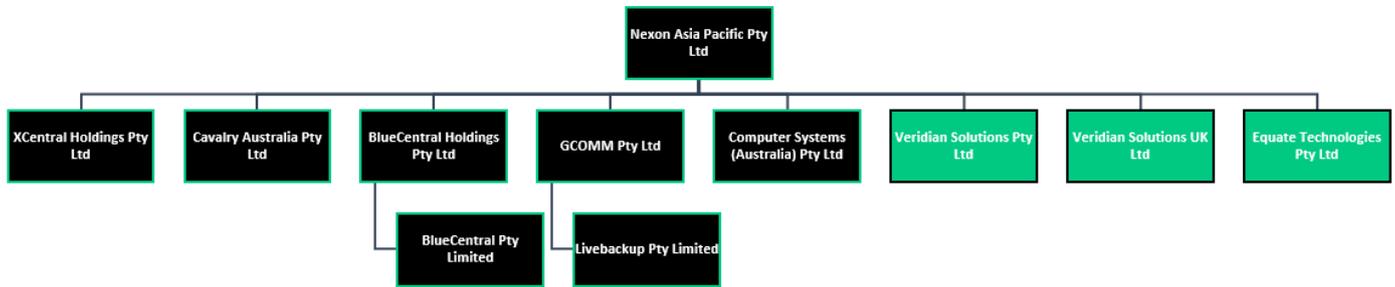
Our Technology Partners

Over the past 20 years, we have continuously reviewed and formed strategic relationships with relevant technology vendors and carriers to ensure that our clients' IT environment is always ready for the changing business environments. Nexon is committed to remaining "agnostic" and maintaining diverse partners to ensure optimal client outcomes.

Some of our technology partners:



Corporate Structure



Recently acquired entities

Nexon operates a number of wholly owned subsidiaries as outlined above. The entities highlighted in green above operate under the brands CSA, Equate and Veridian.



Nexon has recently completed the acquisition of these companies and will be looking to consolidate all three to operate under the Nexon brand. Over the course of the next reporting period, Nexon will be integrating the operations and customer bases of the newly acquired entities to ensure consistent operation across the corporate group.

Nexon is reporting on a consolidated basis on behalf of our wholly owned subsidiaries for this modern slavery statement and will outline the steps taking to ensure our holistic and consistent approach across our group.

Nexon Values

Invested: Our clients are at the centre of everything we do. We are in the business of deeply connecting people with technology, in productive and efficient ways, always working in the interest of our customers.

Happy: We deliver on our promise. Clients are the reason for our success. We are committed to taking the time to listen and understand their business needs to achieve happiness.

Passionate: We love what we do. Helping our clients to run efficiently, creating better user experiences and exploring bigger opportunities with technology.

Honest: We work with integrity. We foster a culture of open communication and trust internally, and with our clients. We set high standards for our behaviour and will always do the right thing.

Empowered: Sense of purpose. We strive for innovation by enabling our employees to push boundaries and deliver better outcomes for themselves, and our clients.

Social Responsibility

Nexon is committed to working with partners and clients to achieve sustainable benefits.

Our CSR initiatives focus on three pillars – Environment, People, and Community.

- **Environmental Sustainability – minimising our impact on the environment**

Recycling paper, card and glass, reducing printing and paper usage and arranging secure disposal of IT equipment are key ways in which we encourage sustainability.

- **People – safe and inclusive workplaces**

Nexon values a safe and inclusive workplace. Our teams are provided with the latest tools and technologies for connection and collaboration, anytime, anywhere, on any device.

- **Community Engagement – supporting local and national charities**

Nexon supports a number of charitable organisations aligned to our values and culture. These include children and youth, mental health, social poverty and domestic issues and neurological, cancer and healthcare causes.

Our People

Type	Number of staff as of June 30, 2022
Full-time and full-time equivalent	427
Part-time	19
Casual	5
Total Employees	451
Contracted through company (40)	
- Full time	30
- Part time	5
- Casual	5
Total Workforce	491

Nexon’s 451 direct employees, including six contract employees, are all located in Australia, work in eight offices across Australia in the states of New South Wales, Victoria, Queensland and South Australia. Our staff consist primarily of full-time and full-time equivalent staff, with over 91% of our staff working on this basis.

We have supplemented our direct employees with 40 workers offshore who are employed through seven separate labour hire companies, mainly in India and the Philippines. The use of offshore contracted labour has been identified as having an elevated level of modern slavery risk due to the reduction in the level of oversight of labour-based suppliers. This is compounded by the high instances of outsourcing of certain functions in the IT industry to jurisdictions with reduced regulatory measures, including India and the Philippines. The use of migrant labour and the prominence of recruitment agencies increases the vulnerability of this workforce. Cognisant of this risk, we have performed supplier assessments on the labour hire companies with whom we work to vet for such risks and we were satisfied with the results.

Nexon’s workforce is organised into the following business units:

- Technology Office

- Finance
- People Experience
- Advisory
- Sales
- Customer Services

Nexon manages its workforce in accordance with the robust legislation and regulatory framework that Australia provides in relation to employment rights and human rights. Nexon is required to maintain best practices, systems and policies that support our staff as part of the relevant legislative framework within Australia.

The vast majority of our staff are educated professionals and require specific qualifications and experience in our industry in order to work for Nexon. The nature of our workforce is less vulnerable to exploitation due to their highly trained and highly educated nature. However, understanding that the IT industry as a whole is susceptible to significant modern slavery risk in the form of contracted, subcontracted or outsourced labour, we endeavoured to take a deeper review of our people outlined below under "Identifying risks of modern slavery".

Our Supply Chains

Nexon primarily operates in the broader IT industry and thus relies upon the supply of IT software and hardware for our operations. Whilst Nexon does not sell products in the traditional sense, we provide clients with hardware and software solutions as part of our service offering. As part of this service offering, Nexon also engages with suppliers operating in IT-related services including the provision of remote technical support, telecommunications and servers for cloud storage/computing.

The hardware that we procure are primarily from Australian-based technology resellers but the production of such goods and the sourcing of components and inputs are primarily from overseas markets, with a significant proportion of IT technology being manufactured in Asia, notably China, Taiwan and Malaysia. The suppliers from whom we source these hardware solutions are large multinational corporations that are able to ensure supply of the necessary hardware that we require

Identifying risks of modern slavery



Nexon undertook a due diligence exercise for this reporting period to identify the potential areas of modern slavery risk in our operations and supply chains.

Operations

Nexon's operations are primarily based in Australia and as such are subject to the robust labour laws and regulations of the jurisdiction. The need to comply with the standards provided by legislation and regulation provide greater certainty that our staff are not being exploited. Beyond this, the nature of our personnel as highly trained and educated individuals further lowers the potential risk of modern slavery.

Nexon endeavours to maintain a high standard of quality in our operations to achieve and maintain our ISO certifications as well as our approval status with the governments of the various states and territories in Australia. A critical aspect of these certifications is the fulfilment of specific criteria, including having competent and qualified staff to provide secure and quality service to our client and maintaining occupational health and safety.

Nexon's recruitment and retention practices provide a robust means of employee onboarding and ensures that the rights of our people are upheld.

Nexon largely provides its services through direct employees who are subject to the labour laws of Australia. This is supplemented through some contracted labour that is reviewed and vetted by our team to ensure that they are upheld to our standards.

The use of contracted labour to perform remote IT-related services is a common feature in our industry. Contracted labour in remote locations carries an inherent risk of poor transparency and oversight of the working conditions faced by such contracted labour on a daily basis. The IT industry also has a further risk associated with its significant recruitment of migrant workers. The recruitment of migrant workers generally carries the risk of deceptive recruitment and the imposition of recruitment fees, possibly leading to debt bondage, increased worker vulnerability and reduced freedom of choice.

The highly skilled and trained nature of our workforce decreases Nexon's modern slavery risk exposure in our direct operations but we endeavoured to take proactive measures to further mitigate modern slavery risk factors as detailed under "Actions to address risk"

Supply Chains

Nexon has identified the key sources of modern slavery risk in our supply chain is derived from the IT hardware and software industries and the provision of supplementary labour to our workforce.

Beyond the analysis of the industries of Nexon's key suppliers, Nexon also undertook a desktop due diligence exercise of our top 20 suppliers in terms of spend amount in order to better understand the sources of risk from the most prominent suppliers that we deal with.

IT Hardware

IT hardware presents an elevated level of modern slavery risk due to the nature of the components that comprise the devices that we source for our clients. Our direct suppliers of IT hardware are at a low risk as they operate in jurisdictions with added protections for labour. Rather, the risk is incurred deeper in the further tiers of our supply chain, often at the raw material level where less of our spend is reflected and our leverage is minimal. Circuit boards, capacitors and other components in IT hardware rely on the sourcing of certain metals such as cobalt, gold, copper and tantalum. These particular materials have been identified as being related to conflict minerals from areas such as the Democratic Republic of the Congo. These metals and minerals are at risk of being sourced from areas that utilise forced labour and child labour and use the proceeds of their sale to fuel conflict. Again, these elements present greater risk in the lower tiers of our supply chain where Nexon has diminished leverage.

The research and development for these products are located in specialised facilities with a highly trained workforce. However, the assembly and manufacturing of some IT hardware has been associated with industries and locations with an elevated level of risk such as Malaysia and the People’s Republic of China, which have had criticism over the labour conditions in their respective countries. The Asia-Pacific region has been identified in the ILO’s Global Estimates of Modern Slavery as being the most prevalent region for the highest number of people in forced labour. However, it is second to last in terms of “prevalence” (per thousand population).

Despite this, Nexon sources primarily from well-established technology resellers in Australia who have taken proactive steps to mitigate their modern slavery risk as noted in of their own modern slavery statement and as such, have more transparent supply chains. These resellers source the hardware we use from large multinational companies that have also undertaken steps to better address modern slavery in their supply chains by instituting conflict mineral policies and responsible procurement policies, among other forms of mitigating actions. The suppliers from whom Nexon sources from present robust governance and are reporting entities under the Act or similar laws or regulations in other jurisdictions. A desktop due diligence of the key suppliers in Nexon’s IT hardware supply chain demonstrates that suppliers are taking a proactive approach to modern slavery risk and have statements relating to the procurement of conflict minerals.

IT Software and Services

Software

In terms of software, these products are often developed by highly trained and educated individuals in jurisdictions with relatively robust labour laws such as the US and Australia. These products have not been identified as a source of elevated risk given the skilled and educated workforce required to produce such products. Our direct suppliers operating in this industry have also demonstrated actions to mitigate their modern slavery risk as detailed in under “Top 20” illustrating a relatively low risk of modern slavery occurring.

Services

Service based industries are identified in the ILO’s Global Estimates of Modern Slavery as being the most prevalent business sector for forced labour exploitation, consisting of an estimated 32% of total forced labour.

Nexon procures IT related services in the form of data centres, servers and cloud-based services. The use of outsourced labour in providing these technical services may be at higher risk of exploitation given the lack of visibility over the working conditions of such workers and the prevalence of these service providers in higher risk regions such as India and other Southeast Asian countries. These suppliers also largely source their own IT hardware which is exposed to the risks outlined above.

However, the nature of the industries in which our suppliers operate requires technical expertise and training in the relevant processes of the IT systems. The required skills and training of the workforce operates to reduce the risk of labour exploitation when compared to other service industries.

Top 20

Representing 633 of our total supplier spend data, we undertook a desktop due diligence exercise of our key suppliers to better understand their modern slavery risk profile and the actions they have undertaken to identify, mitigate and minimise their respective sources of modern slavery risk.

16 of our top 20 suppliers have published a modern slavery statement under the Act, demonstrating a level of awareness and proactivity towards the risk of modern slavery as well as outlining the actions taken to address such risks. Of the four that had not published a modern slavery statement;

- one had published a corporate social responsibility statement;
- another was in the process of being acquired by Nexon; and
- the other two are seemingly not subject to the reporting requirements of the Act as foreign entities not carrying on business in Australia.

The vast majority of our top 20 suppliers are located in Australia with 18 being either Australian or the Australian subsidiary of multinationals. Therefore, they are subject to the strong legislative framework of the Australia, requiring companies to comply with local labour laws that are comparatively more stringent than other jurisdictions and as previously mentioned, may report under the Act.

Case Study – Overseas due diligence

- Only two of our top 20 suppliers are located outside of Australia in India and France.
- In order to better understand the risk profile of these two suppliers, we undertook further due diligence.
- Reviewing open data sources such as the Walk Free Foundation's Global Slavery Index and company published information, we undertook an assessment of the two supplier's capabilities to effectively identify, mitigate and remediate any modern slavery risk in their operations and supply chains.
- Our analysis found that:
 - The French supplier is a large multinational company that largely operates in the telecommunications space;
 - Publicly available materials evidence a commitment to better social sustainability; and adherence to UN guiding principles as a member of the UN Global Compact.
 - The Indian supplier is a smaller company with whom Nexon procures business process management services;
 - Noted lack of publicly available information relating to the actions of the Indian supplier in respect of modern slavery.
- In this regard, Nexon will endeavour to engage with this supplier in the next reporting period through requests for information to better understand their proactivity to the risk of modern slavery in their operations and supply chains.

The level of modern slavery risk in the industries that form in industries and geographies that we have assessed as having an elevated level of risk or in the top 20 of our suppliers which represent the majority of our risk profile presents risks that are largely associated with the industry in which we operate.

Whilst not identifying any specific instances of modern slavery in our supply chains, Nexon undertook a number of proactive steps in order to mitigate modern slavery risk in our operations and supply chains

Actions to address risk



We have focused our efforts in our initial reporting years on making appropriate adjustments to our governance framework to ensure our policies and risk management effectively address the modern slavery risk in our operations and supply chains.

Modern Slavery Policy

Our Modern Slavery Policy is a key governance document that outlines the commitments of Nexon to assess and address modern slavery risk in our operations and our supply chains. The Policy is informed by leading international convention and align with internationally recognised human rights. The Policy sets out the high standards of care that Nexon expects from our personnel as well as the entities and people with whom we partner with.

This document is available to our staff via the HR onboarding process .

Corrective Action Plan (CAP)

- The Nexon Modern Slavery Policy provides the procedure by which any instance of actual or suspected modern slavery or breach of the Policy is to be remediated.
- The CAP provides:
 - that the issue is to be clearly identified;
 - the methods to correct or address any issue laid out;
 - the corrective actions prioritised and CAP implemented;
 - its results thoughtfully examined; and
 - the CAP and the Policy to be reviewed and revised to improve outcomes (if necessary).
- During the reporting period, Nexon recorded zero instances of any breach of the Policy and recorded zero CAPs prepared for remediation.

Code of Conduct

Nexon's Code of Conduct sets out the standards of behaviour that is expected from our staff and is underpinned by Nexon's values and the principles of integrity and respect. Directors, employees, contractors and third-parties acting on behalf of Nexon must be aware of and comply with the Code and any breach of the Code may lead to disciplinary measures taken by Nexon. Key components of the Code require that Nexon personnel must act with trust, honesty, confidentiality and be respectful of differences among colleagues. The Code also prohibits the harassment, bullying, intimidation and dishonesty in the course of their employment.

Record retention

In order to better understand the changing and developing landscape of modern slavery, Nexon has committed to conducting thorough reviews of our modern slavery risk every year. The records of these reviews are to be retained and to be revisited as we further our understanding of Nexon's modern slavery risk profile and refine our approach to address identified risks.

Training

A key step in ensuring that modern slavery risk is minimised is empowering our personnel with the knowledge to readily identify modern slavery risk or conditions which are conducive to modern slavery practices if unchecked. Nexon has partnered with corporate training company, Go1, to provide our staff with robust yet concise training modules of modern slavery.

Raising awareness is a key aspect of our actions to address risk as our personnel are the individuals best positioned to readily identify any suspected or actual instances of modern slavery in our operations and interactions with suppliers. In the initial rollout of the Go1 platform, Nexon has rolled out the modern slavery awareness module to onboarded staff 36 staff as a pilot program. However, in the upcoming reporting period, we will be looking at rolling out the modules to all Nexon staff.

Whistleblower Policy and Procedure

Nexon's Whistleblower Policy and Procedure sets out the framework by which individuals can report any behaviour that is contrary to our standards and expectations. The Policy provides guidance to our personnel, suppliers, contractors, consultants and the relatives, dependants or spouses of such individuals on how to make a report. The Policy also outlines the protections provided to those individuals including maintaining the confidentiality of a report and the anonymity of the person making the report.

The Whistleblower Procedure outlines the specific roles of Nexon personnel in the whistleblowing process and the responsibilities of those identified individuals. The Procedure provides an outline of where to make a report, to whom a report may be made and the independent whistleblower service that Nexon engages with to provide reporters with a means of reporting misconduct, including modern slavery instances, should they feel uncomfortable to do so with Nexon.

The Procedure outlines the investigative process and the potential outcomes that may arise as a result of an investigation.

In this reporting period, Nexon has reported zero reports or concerns relating to modern slavery and modern slavery risk indicators.

Assessing the effectiveness of our actions



Nexon has identified a number of key metrics to be monitored on a regular basis in order to determine the effectiveness of our strategies.

The inaugural training modules prepared in conjunction with the Go1 platform initiated their rollout and will continue to be distributed to all staff in the next reporting period. By this time next year, Nexon aims to achieve 100% of our workforce to have completed our modern slavery training modules.

Our Whistleblower hotline, both internal and externally managed, received no reports related to modern slavery and/or potential indicators of modern slavery. Zero reports related to general labour conditions. This represents the maintenance of no reports from the previous reporting period.

As part of our modern slavery policy, we record any breaches of the policy by our staff or an affiliate of Nexon. In the event of a breach, we will implement a CAP and notify customers, suppliers, partners or affiliates of the potential brief and procure evidence that the breach has remedied. In FY22, we recorded zero breaches of the Modern Slavery Policy.

Consultation



In creating this modern slavery statement and revising the Policy, Nexon has consulted with experts in the modern slavery space in order to better understand our modern slavery risk profile and the steps that we can undertake to mitigate such risks.

Nexon are committed to developing and maintaining a unified process to modern slavery across our group and recognise that our controlled entities has an integral role in ensuring a consistent, group-wide approach to modern slavery.

We undertook consultation with our controlled entities through meetings of our executive team and board, engaging with key personnel across our business units in order to generate a holistic understanding of our risk profile. This consultation has allowed us to create a group-wide approach to modern slavery, identifying key areas of risk and culminating in this modern slavery statement. In order to continue this consistent approach, Nexon has utilised Go1 to provide all of our personnel with access to training on our policies, procedures and this statement to ensure that our approach to modern slavery is widely shared.

COVID-19 impacts



The COVID-19 pandemic has posed a significant challenge in maintaining the health and safety of our workers. The pandemic has led to significant supply chain disruptions and unstable labour markets. Combined with large-scale armed conflicts and natural disasters, this has increased the risk of labour exploitation domestically and abroad, as businesses seek to maintain profit levels in the face of inflation and increased operational, procurement and transport costs.

In order to ensure the ongoing safety of our staff and the security of their employment, Nexon implemented a hybrid working policy to encourage flexible working arrangements which has continued despite lessening restrictions.

Nexon employee assistance program provides our personnel with the flexibility and support to maintain their employment and ensure their ongoing health and safety. Nexon has ran leadership workshops to leaders on how to address mental health issues in workplace and has measured well-being in our engagement survey. Nexon engagement survey results are positive.

The impacts of the pandemic are not contained to the operations of a company but often leads to significant impacts on the supply chains of a company, flowing down through each tier and often with negative outcomes.

Nexon has managed to maintain a relatively static supply chain throughout the pandemic, continuing to engage with suppliers on a consistent basis and maintaining our spending with such suppliers. In doing so, Nexon reduces the risk of any loss of income for those suppliers which would normally lead to downward pressure on their respective suppliers to reduce margins and potentially incur greater modern slavery risk.

Future steps



Nexon is committed to ongoing improvement and the further minimisation of modern slavery risk in our operations and supply chains.

In order to achieve better outcomes in the next reporting period, Nexon will:

- periodically review our risk assessments;
- segmented analysis of modern slavery risk profile of Nexon;
- undertake further due diligence of our key suppliers to identify modern slavery risk in our supply chain;
- implement further actions to engage with elevated risk suppliers to better understand and potentially remediate their risk;
- implement further governance documents to ensure robust operations, resistant to modern slavery risk; and
- undertake further in-depth training of staff to better their understanding of the modern slavery issue.