

MODERN SLAVERY STATEMENT

Centrepont Alliance Limited
(ABN 72 052 507 507)

12 December 2023



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1. INTRODUCTION

This Modern Slavery Statement (**Statement**) is a statement by Centrepoint Alliance Limited ABN 72 052 507 507 (**Centrepoint Alliance or the Company**) and its controlled entities, and has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (the **Act**).

Centrepoint Alliance is committed to ensuring we have effective policies and procedures in place to minimise the risk of modern slavery occurring within our business operations and supply chains. Centrepoint Alliance has a strong commitment to governance processes, risk management, corporate culture, safety and compliance. These underpin the Company's commitment to a strong ethical and responsible approach to the conduct of our business operations.

This Statement sets out the actions that Centrepoint Alliance has taken to understand the potential modern slavery risks related to its business, and the steps it has implemented in the financial year ended 30 June 2023 (**Reporting Period**) to identify and prevent modern slavery in its supply chains.

2. CENTREPOINT ALLIANCE'S BUSINESS

The Centrepoint Alliance Group

Centrepoint Alliance and its controlled entities (the **Centrepoint Alliance Group**) operate in the financial services industry in Australia and provides a range of financial advice and licensee support services (including licensing, systems, compliance, training and technical advice) and investment solutions to financial advisers, accountants and their clients across Australia, as well as mortgage aggregation services to mortgage brokers.

The Centrepoint Alliance Group holds four Australian Financial Services licences and one Australian credit licence and is the Responsible Entity for an IDPS-like scheme.

As at 30 June 2023, the Centrepoint Alliance Group provided technical, compliance and business management support services to approximately 511 financial advisers under its own licences, with 5 salaried financial advisers, and provided services to over 196 self-licensed financial practices covering 797 financial advisers. The Centrepoint Alliance Group consists of a number of entities in the areas of Licensee & Advice Services, Funds Management & Administration, Corporate Services and Technology.

The below table includes all entities that are 100% owned by Centrepoint Alliance.

| Name | Principal Activity |
|--|-----------------------------------|
| Licensee or Advice Service | |
| Centrepoint Alliance Lending Pty Ltd | Mortgage broker/aggregator |
| Alliance Wealth Pty Ltd | Financial advice |
| Professional Investment Services Pty Ltd | Financial advice |
| Matrix Planning Solutions Limited | Financial advice |
| Associated Advisory Practices Pty Ltd | Support services to AFS licensees |
| LaVista Licensee Solutions Pty Ltd | Support services to AFS licensees |

| Name | Principal Activity |
|--|---|
| xseedwealth Pty Ltd | Salaried advice |
| Funds Management and Administration | |
| Investment Diversity Pty Ltd | Packages investment platforms |
| Ventura Investment Management Limited | Packages managed funds and Responsible Entity |
| Corporate and Technology | |
| Centrepoint Alliance Services Pty Ltd | Trustee-employee share plan |
| Centrepoint Services Pty Ltd | Service company |
| Centrepoint Wealth Pty Ltd | Holding company |
| Presidium Research and Investment Management Pty Ltd | Dormant |
| Professional Accountants Pty Ltd | Loans to advisers |
| Enzumo Corporation Pty Ltd | Technology service company |
| Enzumo Consulting Pty Ltd | Technology consulting services |
| A.C.N. 133 593 012 Pty Ltd | Dormant |

During the Reporting Period, the Centrepoint Alliance Group engaged with approximately 201 suppliers. Centrepoint Alliance aims to establish a relationship of trust and integrity with all its suppliers, which is built upon mutually beneficial factors.

Centrepoint Alliance's Modern Slavery Governance Framework

The Company's purpose is to ensure our authorised representatives and licensees provide the best financial advice and financial services to the Australian community. Our values and expectations are reinforced across the Company through various communication channels, policies and training.

The Centrepoint Alliance Board of Directors is accountable for the Centrepoint Alliance Group's audit risk and compliance framework. The Company's internal Modern Slavery Working Group reports to the Board through the Compliance Committee and the Group Audit, Risk and Compliance Committee.

3. RISKS OF MODERN SLAVERY IN CENTREPOINT ALLIANCE'S OPERATIONS AND SUPPLY CHAINS

Centrepoint Alliance operates in the regulated Australian Financial Services environment, and within a highly regulated labour market with award safeguards for employees in most industries, with the risk of modern slavery in our operations on-shore being assessed as being low.

Centrepoint Alliance recognises that as a responsible company we must regularly assess our processes and identify any potential risk areas. Centrepoint considers it has a low risk of exposure to modern slavery practices because:

- Centrepont does not have any offshore office arrangements;
- Centrepont Alliance has implemented employment standards which meet or exceed the *Australian Fair Work Act 2009*; and
- All employees, advisers and suppliers are encouraged to report any concerns directly to Centrepont Alliance via Centrepont Alliance’s Whistleblower Policy.

Accordingly, the following potential risks in our operations and supply chains have been identified, although they are considered very low risk:

- Centrepont Alliance may be at risk of involvement in modern slavery because some work (paraplanning and software coding) may be performed remotely or offshore;
- Contractors or our advisers may use uneducated or foreign workers, (example cleaners at leased premises); or
- Suppliers may provide services from offshore locations where Centrepont Alliance has limited direct visibility as to operational standards.

Centrepont Alliance has identified the following risks in our operations and supply chains which are considered a higher risk:

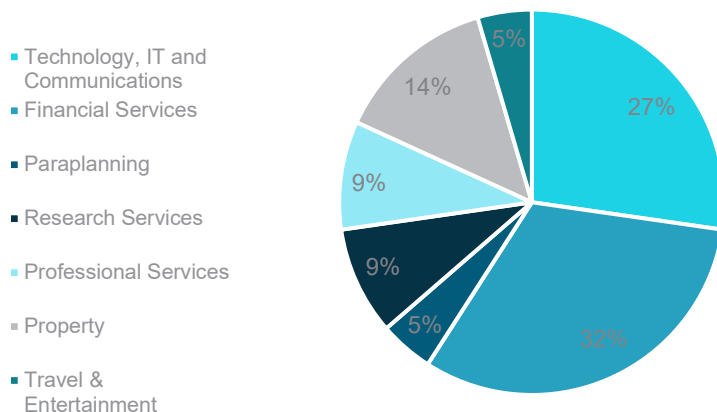
- Leased property cleaning and facilities services;
- Two major technology suppliers have a high number of employees in some or all of the following companies - India, Philippines, Tunisia, Hong Kong, Singapore and South Africa; and
- Computer, information and communication hardware such as devices, phones and computers.

Centrepont Alliance risk assessment

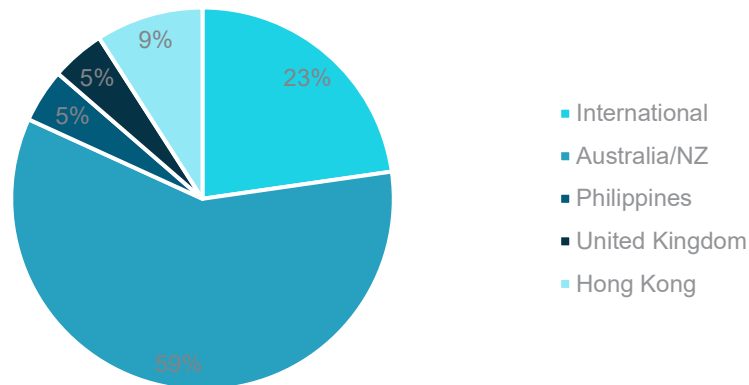
The Centrepont Alliance Modern Slavery Working Group has assessed the modern slavery risk for each supply chain, at a certain spend level. The methodology is based on value of spend, geographic risk, services/product risk, sector risk and entity risk.

Due diligence has been performed on the relevant parties, with areas identified in the supply chains as high risk being cleaning, catering & security, offshore professional services, leasing and facility management, software licensing, computer hardware including laptops and phones. The following graphics provide an overview.

Top Suppliers by sector (%)



Top Suppliers by geographic location (%)



16 of our top 24 suppliers report through their own Modern Slavery Statement or equivalent. The remaining eight appear to be exempt from reporting under the Modern Slavery Act (i.e. 73% of our top suppliers have published a Modern Slavery Statement). It has also been identified that the majority of our top suppliers are all reputable large companies with strong governance structures. Centrepoint Alliance conducts rigorous due diligence processes prior to engaging a new service supplier of material contractual value. Due to the size of many of our top suppliers, the majority of them qualify as reporting entities under the Act.

In addition, Centrepoint Alliance undertakes periodic reviews to obtain various assurances from its service providers including their employment practices.

Centrepoint Alliance will not support suppliers or contractors where we become aware, or where we have reasonable grounds to believe, that slavery or human trafficking is taking place in their own businesses or their supply chains.

Centrepoint Alliance has made an overall assessment that its operations and suppliers present a low risk of modern slavery. Centrepoint Alliance notes that many of its suppliers (including many of its largest) are in the financial services industry in either technology or professional services. In Australia, Centrepoint Alliance understands this industry is considered to have a lower risk for prevalence of modern slavery.

Of Centrepoint Alliance's top suppliers the biggest risk remains with a single supplier who provides paraplanning services using contractors based in the Philippines. The Philippines has a medium to high prevalence of modern slavery according to the Global Slavery Index. However, the Global Slavery Index ranks the government response in the Philippines to be high.

4. POLICIES AND GOVERNANCE

Centrepoint Alliance's approach to modern slavery is a company-wide approach. Its governance structure oversees the management of modern slavery risks.

Centrepoint Alliance has a comprehensive risk management framework that addresses all operational risks to the business including modern slavery risk, mitigation and prevention. Centrepoint Alliance continues to risk assess each of its top suppliers to identify any potential for modern slavery risk.

Centrepoint Alliance continues to engage with new or re-engaged suppliers throughout the contract process to ensure modern slavery risks in their business are addressed in contractual terms.

Centrepoint Alliance continues to review and update its policies as required.

Centrepoint Alliance has the following policies in place which assist in identifying and preventing modern slavery in its operations:

- **Whistleblower Protection Policy** – Centrepoint Alliance encourages all employees, customers and suppliers to report any suspicion of modern slavery without fear of retaliation. Centrepoint Alliance ensures a confidential process to protect the identity of whistleblowers.
- **Code of Conduct** – Centrepoint Alliance’s code of conduct encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. Centrepoint Alliance strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- **Grievance Policy** – Centrepoint Alliance is committed to promoting a healthy and productive work environment. It is recognised that disputes and grievances may arise in the workplace and acknowledge the rights of employees to raise these concerns.

5. AWARENESS AND TRAINING

Centrepoint Alliance has raised awareness of modern slavery issues by undertaking mandatory annual training with all members of its staff to maintain a focus specifically on modern slavery. The training included information regarding:

- What is modern slavery;
- How we can identify modern slavery;
- What is Centrepoint Alliance doing to combat modern slavery; and
- Further information available on modern slavery.

Centrepoint Alliance’s management are engaged and are also trained in modern slavery risks.

6. HOW CENTREPOINT ALLIANCE IS PERFORMING AND NEXT PHASE

In this Reporting Period, the risk of modern slavery in Centrepoint Alliance’s operations and supply chains, has again been assessed as being low.

Centrepoint Alliance will further review our practices in the next reporting period with a commitment to:

- Commitment to continue improvement of policies and procedures that continue to strengthen our commitment to mitigating modern slavery in our supply chains, where possible;
- continue our due diligence to identify material modern slavery risks in our operations and supply chains;
- continue to integrate modern slavery requirements (for example evaluations, questionnaires) into procurement and review processes for suppliers and contractors;
- continue to enforce inclusion of relevant modern slavery clauses in its contracts with suppliers; and
- continue to provide training for staff and management on issues relating to, and identification of modern slavery in our supply chain.

7. PROCESS OF CONSULTATION

The Centrepoint Alliance Board of Directors is the principal governing body of the Centrepoint Alliance Group.

All subsidiaries reporting into the Centrepoint Alliance Group operate under a common and consistent governance framework to build expectations and raise awareness when assessing and addressing modern slavery risks in its operations and supply chains.

8. OTHER RELEVANT INFORMATION

This statement covers the Reporting Period 1 July 2022 to 30 June 2023 and has been approved by the Board of Directors of Centrepoint Alliance Limited on 12 December 2023.



John Shuttleworth
Chief Executive Officer

12 December 2023

Modern Slavery Reporting Criteria

| Mandatory Criteria (section 16 of the Act) | Relevant section in Statement |
|---|--|
| The reporting entity | Section 1 - Introduction |
| Structure, operations and supply chains | Section 2 – Centrepoint Alliance's Business |
| Risks of modern slavery practices in our operations and supply chain and any controlled entities | Section 3 - Risks of Modern Slavery in Centrepoint Alliance's Operations and Supply Chains |
| Actions taken to assess and address those risks, including modern slavery due diligence and remediation processes | Section 3 - Risks of Modern Slavery in Centrepoint Alliance's Operations and Supply Chains |
| How the effectiveness of actions taken were assessed | Section 3 - Risks of Modern Slavery in Centrepoint Alliance's Operations and Supply Chains |
| The process of consultation with owned and/or controlled entities | Section 7 - Process of Consultation |
| Any other relevant information | Section 8 - Other Relevant Information |