

Modern Slavery Statement FY24

INTRODUCTION

Banktech Australia Pty Ltd ('Banktech') is committed to mitigate the risk of all forms of "Modern Slavery" as defined by the Modern Slavery Act 2018 (Cth) and NSW Modern Slavery Act 2018 by improving processes and procedures accordingly. Below is a summary of Banktech's structure, internal operations, and supply network along with our initiatives to minimise the risk of modern slavery within Banktech's supply network and operations.



1. Banktech Structure

Banktech was established in the ATM industry in 1991. Originally supplying ATMs and parts to banks, building societies and credit unions, in 1998 Banktech became the first independent (non-bank) ATM distributor with the launch of the CashConnect ATM Network. Today, Banktech Australia owns and operates more than 2,500 ATMs across hotels, clubs and casinos across Australia.

Banktech employs approximately 170 staff members across its Australian operations across several departments:

- Sales and Marketing
- Software and Hardware Development
- Manufacturing and Warehousing
- Operations and Customer Service
- Technical Services and Information Technology
- Finance, Contracts and Compliance

All staff report to the Senior Manager of each department who report to the Group Managing Director.

2. Supply Network (Supply Chain)

Banktech's supply network consists of proprietary hardware, firmware and software products which are "fit-for-purpose". Other items include "off-the-shelf" computer hardware and software.

3. Anti-Modern Slavery Policy

Banktech's policies have been created to ensure no Modern Slavery occurs within any functions of the company. Our Anti-Modern Slavery Policy also extends to any associates of Banktech to ensure ethical practices and strict controls are upheld to eliminate the potential risk of Modern Slavery.

All staff at Banktech are required to remain compliant with the policy and must acknowledge their understanding of the requirements within.

4. Risk Assessment

Banktech upholds a robust compliance program which includes assessing the suitability of all associates of the company. This includes probity of potential staff members and any association within the supply network. Along with a Modern Slavery Questionnaire for new customers, regular interaction with suppliers confirms their continued suitability to be associated with Banktech. Banktech also requests confirmation from suppliers that they have implemented a similar Anti-Modern Slavery policy and that they have suitably assessed their supply networks for any potential existence of Modern Slavery. Banktech may also request evidence of such policies which are reviewed by Management to assess their suitability and identify any items which Banktech requires further action to be taken.

5. Potential Risks within our Operations and Supply Network

Banktech has undertaken a review across our operations and supply network to identify any potential risk of modern slavery practices while taking into consideration to the following profiles:

- High Risk Populations -- low skill base workers, migrant workers
- High Risk Categories -- consumables, raw materials, services providers
- High Risk Business Models -- franchising, seasonal workers, labour outsourcing
- High Risk Geographies -- corruption, conflict, ineffective laws, dereliction of human rights

Suppliers considered to potentially fall within any of these profiles were reviewed and further assurances sought from these suppliers that they are; aware of and compliant with the Modern Slavery Act 2018 (Cth) and NSW Modern Slavery Act 2018 and can provide a statement or evidence of their compliance. Banktech's review

process has been documented within our Anti-Modern Slavery policy and will be further refined over time such that continual improvement and assurance can be achieved.

To enhance Banktech’s supplier due diligence and dive deeper into the supply network, additional considerations are now included in the review process, this includes assessing employee qualifications, fair pay, human rights policies and reputation. Results of the review are kept in the company records and signed off by a director.

6. Source Locations

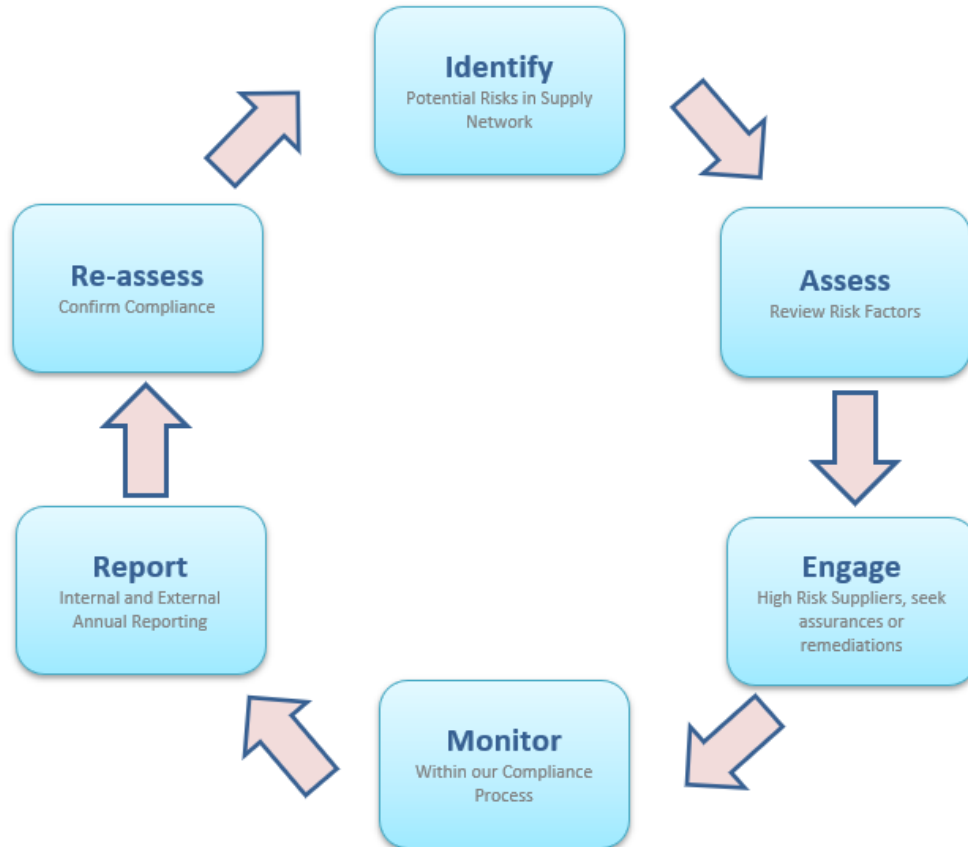


The majority of goods and services that we procure come from suppliers based in Australia.

7. Assessing the Effectiveness of Our Actions

We have incorporated processes to address the various risks of modern slavery practices in our Anti-Modern Slavery policy. This will ensure that Banktech has a robust and effective framework that is embedded into our business.

Our current and future approach towards evaluation, identification and mitigation of Modern Slavery is represented in the diagram below:



8. On-going Initiatives

Banktech remains vigilant across all aspects of the company. As part of the Anti-Modern Slavery policy, all employees are requested to assess and consider actions by suppliers or potential suppliers to ensure they do not contravene the high standards and requirements set by Banktech. Each employee will be required to acknowledge their understanding of the policy on a yearly basis, online training is tracked by Human Resources as part of on-going awareness for employees.

The risk assessment process is live and on-going. Any changes to a supplier’s circumstances or practices will need to be reviewed by Banktech Management who will make further enquires if required.

For the reporting period up to **June 30, 2024** and at the date of this statement, suppliers for Banktech have satisfied all requirements stipulated within the Banktech Anti-Modern-Slavery Policy.

9. Policies and Resources

Banktech implements various policies within the company which complement the Anti-Modern Slavery Policy, these will assist with the identification and mitigation of potential risks within the supply network, enhance our live monitoring practices and awareness of risks and protect employees who come forward to identify the potential existence of Modern Slavery within the supply network. These policies are listed below:

- HR 025 - Anti-corruption and Anti-Bribery Policy.
- HR 028 - Whistleblower Policy
- 98_Anti-ModernSlavery_Policy
- 01a_ComplianceFramework_Banktech_QualityManual_PolicyAndObjectives_e32583

Total number of modern slavery-related complaints received via mechanisms within our Policies is zero (0).

10. Policy Effectiveness and Consultation

As part of Banktech's quality initiatives, reviews of the value and effectiveness of policies take place. This will also include the Anti-Modern Slavery Policy as part of the review process.

During the reporting period this statement covers, Banktech actively consulted with all companies it owned or controlled in the development of this statement. We discussed the details in the Modern Slavery Act 2018.

11. Approval

Banktech acknowledges that modern slavery can occur in every industry and sector and has severe consequences for victims. Banktech is committed to operating to the highest ethical practices and standards, and to addressing and managing modern slavery risks in its supply network in accordance with this statement.

*This Modern Slavery Statement has been written for Banktech Australia Pty Ltd and is relating to the financial year ending **June 30, 2024**. At a meeting of "The Board" it was **RESOLVED** that the Board of Directors **approved** the Banktech Australia Modern Slavery Statement e49738 and is to be signed by the Board Member and Group Managing Director – David Glen and is approved for release and publication.*



David Glen
Group Managing Director
Banktech Australia

6th August 2024

Date Approved