

# Cirrus Networks Holdings Limited

ABN: 98 103 348 947

## Modern Slavery Statement

**Reporting Period:** 1 July 2021 to 30 June 2022

**Registered Office:** Level 28, 108 St Georges Tce,  
Perth, WA 6000

**CIRRUS**

## **Who are Cirrus Networks Holdings Limited (“Cirrus”)?**

Cirrus is an Australian owned and operated business incorporated in Australia and relentless on continued transformation, it is our mission to develop a lasting, growing and profitable managed technology solutions business through strong client engagement and the excellence of our people. We engage our clients via a consultancy approach and push technology innovation specific for the industry type. We don't have an off the shelf agenda and we're happy to design innovative solutions in unexplored territory. Our purpose is to deliver genuine client business improvement utilising best fit technology solutions, reached by understanding organisational drivers, challenges and budgets.

## **Our Work Force**

Cirrus employs over 150 people with offices in Perth, Canberra, and Melbourne. Our workforce includes Sales and Marketing, Presales, Procurement, Finance, HR, Network and Systems Engineers, and Operational Support which are comprised of experienced and highly-skilled specialists which in turn assists in lowering the risk of modern slavery occurring in our operations. Our team is a trained, professional workforce which is subject to the strong legislative frameworks of Australia. Our human resources department and the strong oversight provided by the Executive team allows us to screen, onboard and oversee employees in a manner that mitigates the potential for modern slavery.

Employees are strictly required to adhere to our Code of Conduct as well as other standards of practices and procedures to ensure that they, and Cirrus, act in an ethical and professional manner. Cirrus has a Whistle-blower policy in place allowing employees to raise complaints or concerns (anonymously if desired) with the company that are reviewed and accessed with the goal of action and resolution.

## **Whistle-blower Policy**

We believe that every employee should have the chance to speak up anonymously when they see conduct not aligned to our corporate values or not in compliance with applicable law. Our Whistle-blower Policy establishes the mechanism by which our staff can freely (and anonymously, if desired) report conduct that goes against the values and standards of Cirrus. This includes any concerns regarding modern slavery in our operations and supply chain.

## **Entities and Structure**

Cirrus is a reporting entity under s 5(1) of the Act. This statement is presented on a consolidated basis and Cirrus is reporting on behalf of the consolidated group which include, but is not limited to the following trading entities:

- Cirrus Networks (WA) Pty Ltd (ABN: 72 161 277 121)
- Cirrus Networks (ACT) Pty Ltd (ABN: 85 143 561 291)
- Cirrus Networks (Victoria) Pty Ltd (ABN: 64 151 940 215)

## **Cirrus operations and supply chains**

Cirrus provides Australian customers with software, hardware network support. Over 60% of our customer base is within the government sector.

Our procurement from suppliers is predominately Australian based, with a limited amount of procurement directly from the USA and other low risk countries.

## Policies and Protocols

A major factor in our modern slavery strategy is our strong corporate governance and management oversight, most readily evidenced by the policies and protocols with which our employees are required to comply. These policies and protocols help us embed our anti-slavery principles in our company and ensure we carry out our mission to mitigate modern slavery in a consistent manner across our operations and supply chains.

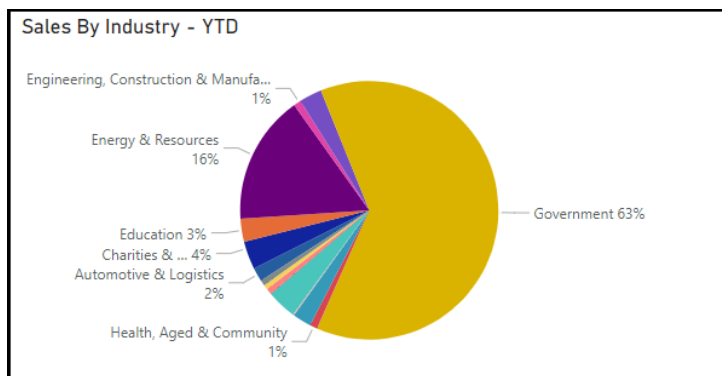
## Risk of modern slavery practices in operation and supply chains

Cirrus has undergone an extensive discovery process to map out our broad operations and overall supply chain structure. The scoping exercise has identified the general sectors and industries procured, and any trends involved in procuring Cirrus’s suppliers for its operations. We have not identified any geographical, or other risks which may contribute to modern slavery.

### Review of supply chain:

#### a) Customer breakdown

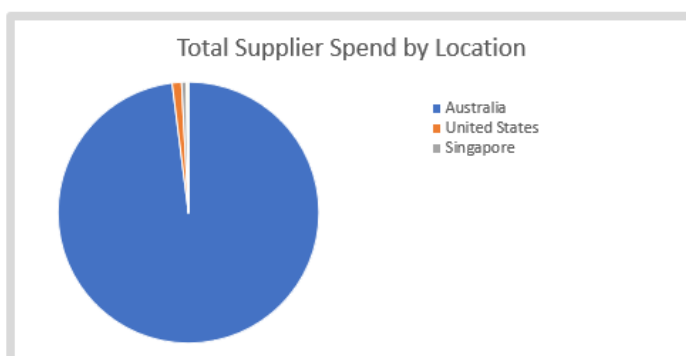
Our customers are 100% Australian based with 63% of our business sales in Government. Our second highest industry sales are to the Energy & Resources Sector to Blue Chip ASX listed enterprises.



#### b) Supplier breakdown

### Total Supplier Spend by Location:

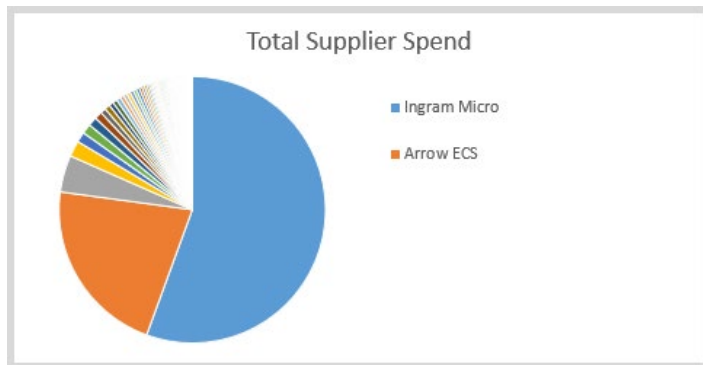
Our supplier locations are largely aligned to our business and customers locations. 98% of our supplier locations are based in Australia.



### Total Supplier Spend by Supplier:

Our two largest suppliers make up over 75% of our purchases. We procure through the Australian based which are resellers of manufacturer IT products. We have reviewed our significant suppliers' commitments to reducing the risk to modern slavery:

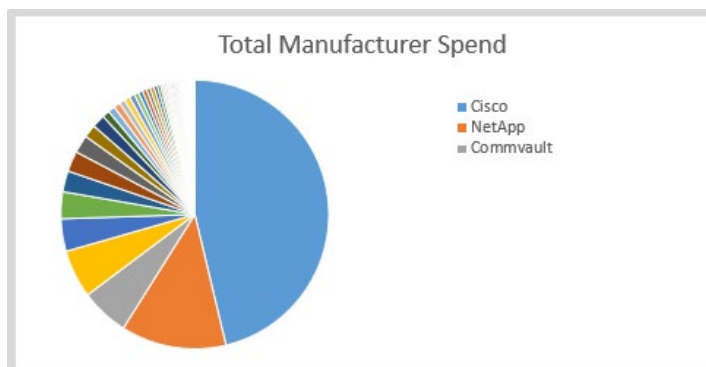
- [Ingram Micro Modern Slavery Statement](#)
- [Arrow Modern Slavery Statement](#)



### c) Total Spend by Manufacturer

The three largest vendor's that manufacture the products that we resell make up over 60% of our purchases. We have reviewed our significant vendor' commitments to reducing the risk to modern slavery:

- [Cisco Modern Slavery Statement](#)
- [NetApp Modern Slavery Statement](#)
- [Commvault Modern Slavery Commitment](#)



### Ongoing actions to address risks

Cirrus continually assesses and action in areas of our operations and supply chains which potentially may involve higher risks of modern slavery. This approach is based on the UN Guiding Principles for organisations to focus on the most 'severe risk' (a risk that would cause the greatest harm to people). We consider that product procurement through international suppliers and vendors would have the higher risks.

We have completed screening of our significant international suppliers and vendors to understand the safeguards they have put in place to mitigate the potential for Modern Slavery. As we engage new suppliers and vendors, we ensure those renewal agreements impose a duty on our suppliers to ensure their practices do not incite risks to modern slavery and include a 'right to audit' and 'Modern

*Slavery*' contract clauses. This supports our responsibility under the Modern Slavery Act as an Australian business to safeguard that our supply chain is protected against modern slavery risks.

Additionally, the business carries out due diligence and remediation processes which include:

- Where we consider it necessary, identifying and performing an internal audit of our current suppliers, specifically those procured overseas;
- Ensure supplier contracts are consistent with Cirrus standard *Supplier Agreement* terms where possible;
- Screening new/proposed suppliers in accordance with our corporate governance guidelines and internal supplier risk assessment;
- Introducing internal training on modern slavery and process for incident reporting.

#### **Assessment of the effectiveness of these actions**

Cirrus maintains the below Key Performance Indicators (KPI's) which provide a measure of effectiveness (in both qualitative and quantitative ways) in order to evaluate whether our primary aim has resulted in a decrease in modern slavery risks within our supply chain. We refer specifically to our due diligence and remediation processes when assessing these goals:

These specific KPI's include but are not limited to:

- The number of new suppliers which have included clauses around *modern slavery* and audit requirements;
- Completion of internal staff training, and how incident reporting processes have been implemented;
- Considering any trends in cases or risks reported;
- Review our *Risk Management Process*, what information is being drawn out of it, and any accomplishments of minimising risk to date.

Cirrus has reviewed the above KPIs for the prior reporting period and are pleased to confirm that all required action were taken in order to meet our goals. Given the low risk of Modern Slavery to the Cirrus business we do not consider we need to partner with an external auditor or NGO to undertake an independent review of our actions. We will continue to track our progress against these KPI's and consider whether this may change in the next reporting year.

#### **On behalf of the Directors**



**Christopher McLaughlin**  
**CEO and Managing Director**

*This statement is made pursuant to section 13(1) of Modern Slavery Act (Commonwealth) 2018. It constitutes the statement of Cirrus for the year ended 30 June 2022 and was approved by the Board of Directors*