

CASTLEPOINT

Modern Slavery Statement 2020 - 2021

CASTLEPOINT SYSTEMS

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MODERN SLAVERY STATEMENT

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Introduction

This document sets out the steps that Castlepoint Systems have taken to combat modern slavery in our own business, and in our supply chain.

Castlepoint Systems is committed to respecting human rights, and to advancing the changes needed to ensure the world is a healthy, safe, and fair place for all people. We recognise the influence and impact we can have on human rights through our efforts and investments. We are committed to working closely with our stakeholders to identify and understand where we can minimise negative impacts, and realise positive ones.

We recognise our potential role in perpetuating foreign corruption, fraud, bribery, terrorism, and crime if we do not carefully evaluate, assure, and monitor our supply chain. We will never pay bribes or choose to participate in corruption or money-laundering. We will not buy or sell services or products from or to governments or institutions engaged in human rights abuses. We expect all our business partners, clients, and suppliers to practise non-discrimination. We do not tolerate discrimination or retaliation against human rights defenders who are acting to address human rights on behalf of individuals or groups.

Castlepoint Systems is committed to undertaking continuous efforts to ensure that there is no modern slavery or labour-related harm within our operations and supply chain. Castlepoint Systems is committed to the following principles:

- No child labour or forced labour is used, and employment is freely chosen
- All workers in our company and supply chain have fair wages and employment agreements
- Staff work hours do not exceed the maximum limit set by relevant legislation
- Everyone has the right to form and to join trade unions for the protection of their interests
- Workers experience fair and equal treatment and access to opportunity, and enjoy a work environment free of discrimination, harassment, intimidation, or coercion relating directly or indirectly to protected attributes
- All worker health and safety is protected in the workplace
- Workers have access to fair procedures and remedies.

Our Business

Castlepoint™ is a regulatory technology solution that reads, registers, classifies and manages information from all systems in a network, using Artificial Intelligence.

The Castlepoint product applies our Data Castle™ model. A Data Castle is a centralised location in the centre of a network 'kingdom', which overlooks all of the users, data, and events under its protection. Users go about their business as normal, and do not need to bring their information or processes inside the 'castle walls' in order to have them managed compliantly and effectively.



Our governance model

Castlepoint is a Proprietary Australian-owned company. We are a Small to Medium Enterprise (SME). We control a registered entity in the United Kingdom, as well as in Australia.

Business structure

Business name: STLP Consulting Pty Ltd, trading as Castlepoint Systems

Business structure: Australian Private (Proprietary Limited) Company

ABN: 31 128 389 408 **ACN:** 128 389 408 **DUNS:** 756728874

Business location: Canberra, Australian Capital Territory, Australia

Date established: 08 July 2009 (STLP Consulting); 15 October 2018 (Castlepoint Systems)

UK: Castlepoint Systems Limited, Co. No. 12488111, DUNS 225739722, 28 February 2020

Our values, code of conduct, and ethics



Our values influence who joins our team, who we choose to work with and for, and what decisions we make and actions we take. Our values are key to our approach to managing Modern Slavery risk:

1. Ethical – everything we do is mindful of others

We are a progressive company, and we have a strong focus on always being aware of how we could help or harm the world by our actions and inactions. Every time we make a decision, we need to think about who will be impacted. This might be individuals, communities, other companies, or the environment at large. We will always strive to have a positive impact, and avoid having a negative one. Sometimes, a negative impact on someone else will mean we choose not to take advantage of something that would otherwise be positive for us.

2. Hardworking – high standards and a sense of urgency

We all work hard. This does not mean we all work long hours all the time – it's our flexibility and prioritisation of downtime that makes us all as productive as we can be. When we are on

the clock, we are focused, effective, and set a good pace. We stay on task, and our clients know that we are making the best use of any time we bill them. We have very high quality standards – we check and recheck our work, and we make sure that whatever we deliver is international standard. We balance this hard work with appropriate rest, support, and autonomy. We enshrine the rights and freedoms of workers in our company in our policies, and expect the same standards from our suppliers and clients.

3. Integral – we are trustworthy and compliant

For us, integrity means we are defensible, and can always be proud of our conduct. Any decision we make, or action we take, will be lawful and will apply the policies, laws, regulations, and best-practices that are relevant to the work and the client. We also expect this from our partners, clients, and suppliers – we will not work with people or organisations who do not act with integrity. Having integrity is part of what makes us successful: as a regulatory software provider, compliance will always be at the heart of what we do, and will always be a high priority for our customers.

Policies and procedure

Our approach to preventing modern slavery forms part of our broader governance. Our corporate and personnel policies contribute to ensuring that we do not engage in modern slavery ourselves, and we require the same standards throughout our supply chain. Key policies related to human rights and our accountabilities include:

- Code of Conduct
- Corporate Social Responsibility Policy
- Equal Employment Opportunity and Anti-Discrimination Policy
- Human Rights Policy
- Whistleblower Policy
- Workplace Anti-Bullying and Anti-Harassment Policy.

Our operations and supply chains

Business processes

Castlepoint Systems provides software and related services to government and industry, in Australia and overseas. We are an Artificial Intelligence technology company, and we provide capability in support of records management, information management, cyber security, audit, discovery, storage management, and strategic management of systems and information.

Our upstream supply chain includes other software and technology vendors, such as Microsoft and Amazon, on which we host some of our software. Downstream, we partner with third party consulting and technology companies who implement and use our software for their own clients. These partners are based in Australia and overseas. We do not resell our technology through partners, but instead work together to provide outcomes for clients. We do not set targets or performance levels for partners to meet. We always control which clients are able to purchase our software.

We also undertake research and development in Artificial Intelligence technology. For this we cooperate with universities and research institutions in Australia.

Potential risks in our operations and supply chains

Our supply chain is inherently lower-risk for the presence of modern slavery, as we have limited suppliers and partners; they are mostly based in the low-risk geographies of the Commonwealth and United States; they do not involve high-risk business models; and they tend not to employ a large proportion of staff from vulnerable populations. We select out potential clients from high-risk industries and governments, and this position is enshrined in our public Corporate Social Responsibility policy.

However, as we expand our company to work with more partners, across more countries, and supplying to more clients, our risk of modern slavery in the supply chain increases. We must continue to actively monitor these risks, and carefully apply our policies, so that we do not cause, contribute to, be linked to, or profit from modern slavery as we expand.

Addressing the risk of modern slavery practices

We undertake due diligence and monitoring on suppliers, partners, and clients including:

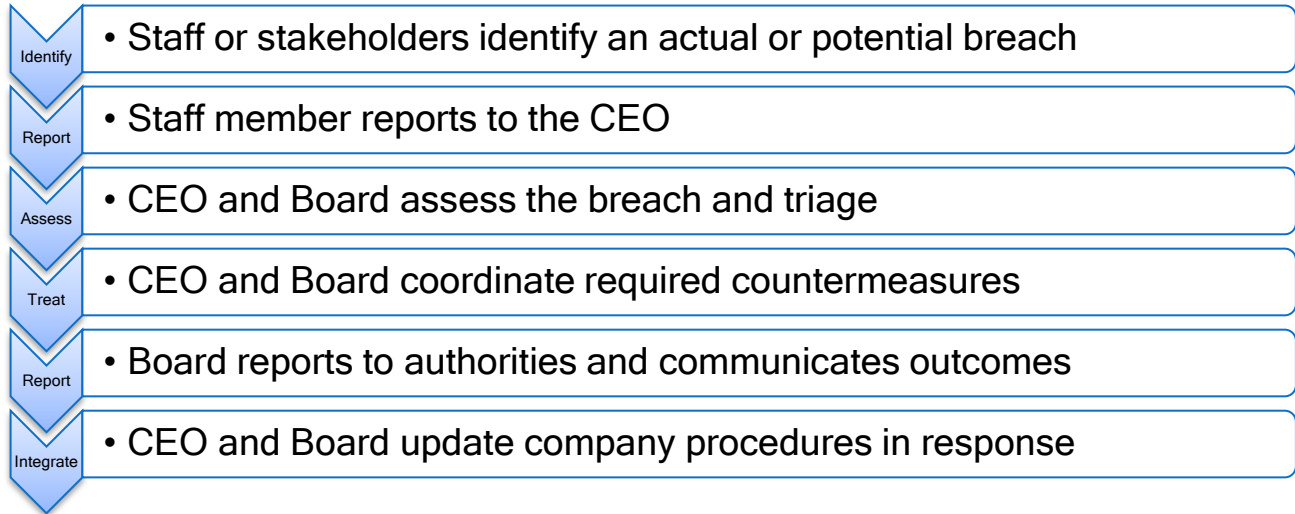
- Assessing their modern slavery risk profile before agreeing to work together
- Screening their operations, processes, and supply chains before entering into an arrangement
- Requesting that they accept our policies, terms, and conditions relating to modern slavery
- Requesting copies of their own equivalent policy and statements, and any impact assessments
- Requesting evidence for their own active management of modern slavery risk
- Monitoring for them in reports, audits, and listings of sanctioned and non-compliant entities.

We also publicly commit to our own modern slavery accountabilities, including with this Statement, and our published Corporate Social Responsibility policy. We also make ourselves accountable with our Grievance and Whistleblower policies. Accountability for ensuring all parts of the business comply with the policy, and for taking action on breaches, is vested in the Chief Executive Officer and Board.

We require all staff to read and understand our policies related to human rights and modern slavery on commencement, and we maintain awareness of risks and issues through routine staff communiques and education sessions.

Assessing the effectiveness of countermeasures

Where a risk is identified, or an impact seen, we will follow our incident response processes:



Following an incident, where countermeasures are used, Castlepoint will undertake a full review of its policies and procedures to identify where improvements can be made to address the root cause of the issues. Investigations and incident responses will be managed transparently, with full Board oversight.

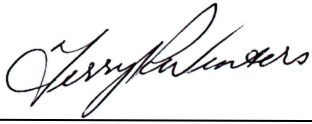
Countermeasures may include, but are not limited to, changing arrangements with the supplier, working with NGOs and other qualified entities to seek support for affected persons, escalation to law enforcement where required, and taking steps to ensure the situation does not recur.

Future commitments

During 2021, our focus will be to:

- Publish our Modern Slavery Statement publicly
- Continue training and education with continually updated materials, to reflect emerging risks
- Add a yearly Modern Slavery review and report as part of our Board standing agenda
- Plan a desk-based audit of several partners in our supply chain, in order to evaluate the effectiveness of our screening and assessment processes
- Undertake a desk-based synthesised breach investigation, to test our response procedures.

This Statement is made pursuant to the *Modern Slavery Act 2018* and constitutes our slavery and human trafficking statement for the calendar year ended 31 December 2020. It was approved by the Castlepoint Systems Board with effect from 21 January 2021 and signed on its behalf by:



Terry Winters

Chair

Date: 3rd February 2021



Rachael Greaves

Chief Executive Officer

Date: 27th January 2021