



orro

The future feels like this

2021\*

MODERN  
SLAVERY  
STATEMENT

# INTRODUCTION

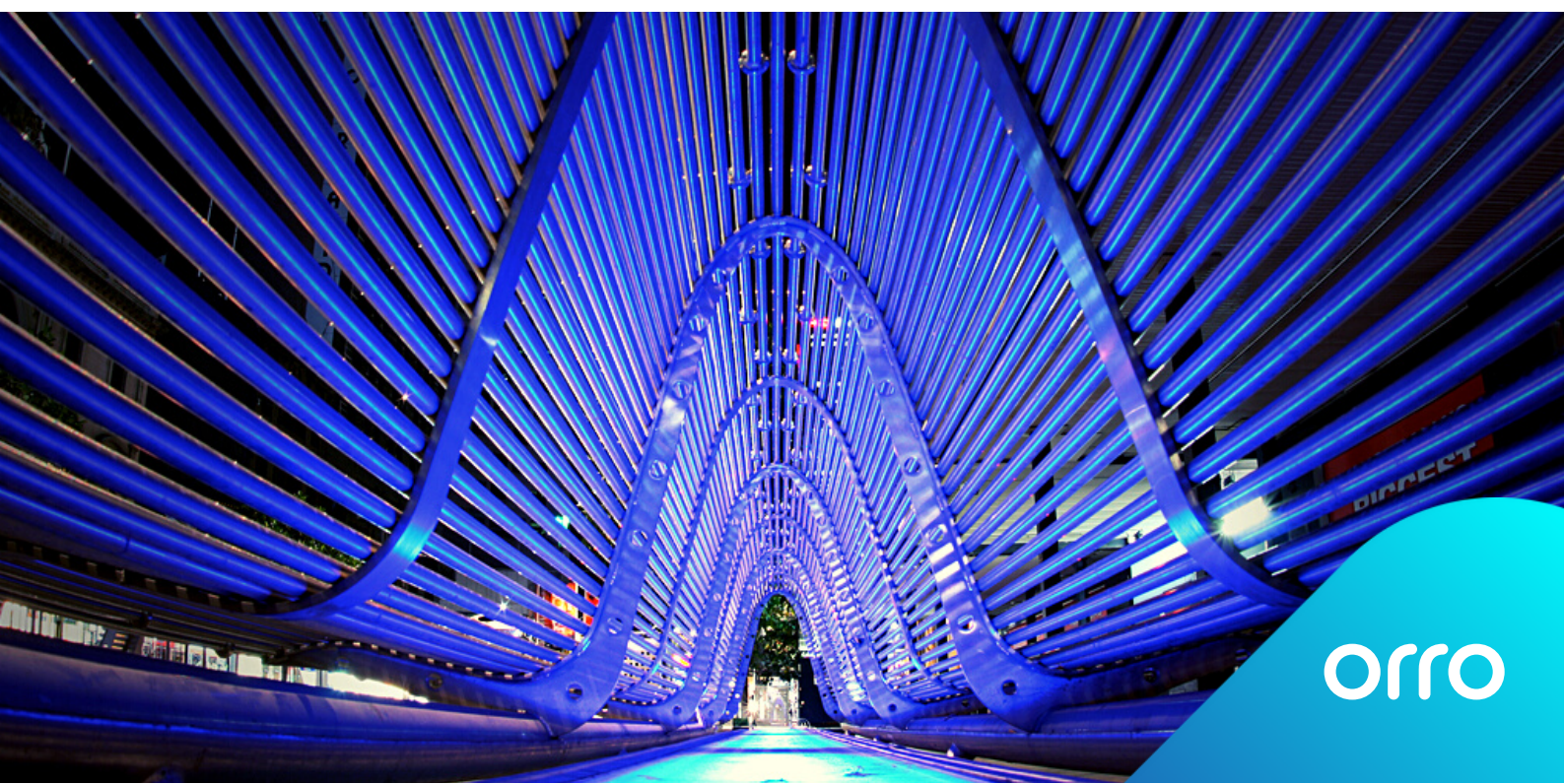
## About the statement

This statement is made as a voluntary submission under the Australian Modern Slavery Act 2018 on behalf of \*Orro HoldCo Pty Ltd (ABN 632 826 030) of 11 Help St, Chatswood, NSW 2067. This statement is made with respect to the financial year ending 30 June 2021 (the Reporting Period). A full list of Orro-controlled entities is listed on page 2.

This statement sets out the steps that we have taken to assess and address the risks of modern slavery practices taking place within our operations or our supply chains during the Reporting Period. In this Modern Slavery Statement, the terms “Orro”, the “Company”, “our business”, “organisation”, “we”, “us”, and “our” refer to Orro, except where the context otherwise requires.

Orro is a privately owned company, with an annual turnover below AUD100 million and majority controlled by Liverpool Partners. To find out more about Orro, you can visit our website: <https://orro.group/>

*\* The cover of this document previously indicated that this was Orro's 2022 Statement. This document is Orro's FY2021 statement. This error was updated as of October 2022.*



## Message from the CEO

Orro provides end-to-end enterprise support. Our platform-enabled secure networks and new generation digital infrastructure deliver the future now for our clients-transforming their business and bringing their people closer together. We want to ensure that as we deliver our services, no one is harmed in the process.

Our work this year to begin and initiate our understanding of modern slavery has been a welcome process. Orro's goal, to strive to harness technology's power to drive improved outcomes, for clients, for each other, and for our communities, doesn't need to come at the cost of livelihoods. The International Labour Organisation (ILO) has estimated that over 40 million victim survivors are affected by modern slavery, with around 25 million of those subjected to forced labour.<sup>1</sup> We recognise that number is too high, and it is a collective responsibility for all businesses to carefully analyse and assess their areas of impact to mitigate harm.

We're proud to launch this voluntary inaugural statement detailing our understanding of modern slavery risks, the ways we anticipate we can address these risks, and our vision for maturing our approach into the future. We are committed to continually improving and understanding our human rights impacts in our operations and supply chain, and fully support the Commonwealth Modern Slavery Act 2018 and its requirements. We are excited to share with you our journey so far and intentions for the future.

This statement was approved by the Board of Orro.

Signed



---

Rodd Cunico  
CEO

---

<sup>1</sup> [Global Estimates of Modern Slavery](#), International Labour Organisation, 2017

# ABOUT ORRO

Orro is a proudly Australian owned and operated platform-enabled secure network and digital infrastructure provider. We assist our clients in the end-to-end installation and maintenance of their digital network services, cloud infrastructure services, cybersecurity services, and digital workspaces. Our staff are responsible for delivering technical expertise for our clients, procuring technology, connecting equipment where necessary and delivering technical services. Orro is a privately owned enterprise, and our primary shareholder is Liverpool Partners (ABN 61 159 465 1903).

Orro has ownership of the entities listed below, which are considered voluntary reporting entities in this statement: <sup>2</sup>

Company Name	Type of Entity	ACN / ABN
CustomTec Pty Ltd*	Local Operating Entity	111 999 663 / 72 111 999 663
Comscentre Pty Ltd	Local Operating Entity	104 092 364 / 76 104 092 364
Comscentre (WA) Pty Ltd	Local Operating Entity (JV 50% operating stake)	626 372 834 / 97 626 372 834
Correct Solutions Pty Ltd	Local Operating Entity	059 444 576 / 16 059 444 576
Cirrus HoldCo Pty Ltd	Holding Company	632 826 030 / 96 832 826 030
Orro HoldCo Pty Ltd	Holding Company	653 127 514 / na
Orro MidCo Pty Ltd	Holding Company	653 129 830 / na
Orro FinCo Pty Ltd	Local Operating Entity	653 130 404 / na
Mach Technology Group Pty Ltd	Local Operating Entity	115 162 564 / 58 115 162 564
Cirrus MidCo Pty Ltd	Holding Company	639 242 774 / 60 639 242 774
Network Technology Capital Pty Ltd	Local Operating Entity	131 174 957 / 28 131 174 957
e-Secure Pty Ltd	Local Operating Entity	086 248 419 / 48 086 248 419
Comscentre Philippines	Foreign Operating Entity	
CTOC Services Inc	Foreign Operating Entity	

\*Note Orro is actively undergoing structural changes in FY22 that will change elements of these entities in future reporting periods including a restructure. Prior to 30th June - this company was called CustomTec Pty Ltd. The name has been changed to "Orro Pty Ltd" ABN 72 111 999 663.

During FY2021 Orro also made generous donations to the Generations Foundation, set up by Liverpool Partners, as part of an ongoing commitment to invest in technology-based education for disadvantaged children. We have also made smaller one-off donations to Macarthur Disability Services, Paraquad, Fit Kids, Lane Cove Parish, Leukaemia Foundation, St Vincent De Paul Society and the Endeavour Foundation.

<sup>2</sup> Voluntary reporting entities were included in the risk assessments conducted and are subject to the policies and governance described in this statement unless otherwise noted.



Through The Generations Foundation, we are investing in technology-based education initiatives to enrich the lives of less advantaged children living within underdeveloped areas.

At the time of writing, we're committing \$175,000 every year to support these initiatives which are opening up new opportunities for disadvantaged children connecting them with the world.

One of the key programs we fund through The Generations Foundation supports ChildFund to improve access to quality education for children with disabilities in the Western Visayas region of the Philippines.

## Our operations

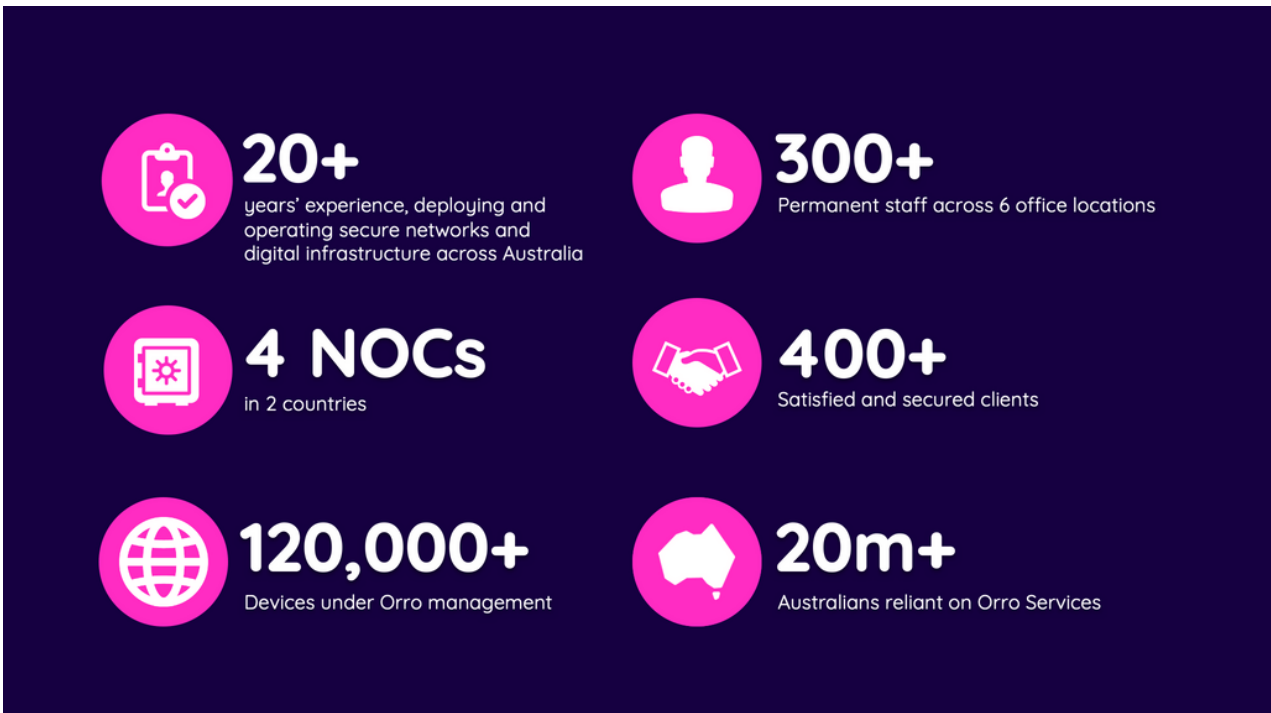
Our own operations, delivering technology and communications professional services, are based in Melbourne, Sydney, Brisbane, Perth and two international offices in Manila and Clark, Philippines.<sup>3</sup> As of 30th June 2021, we have 158 directly employed permanent workers and 3 temporary contract workers in Australia, and 130 directly employed permanent workers in the Philippines. Our main business activities include the procurement of IT infrastructure and devices, the sale of IT products and services including technical support, and internal business support departments such as marketing, human resources, and finance.

Our operations in the Philippines function as a supplement to our Australian services, operating as a call centre to provide technical assistance for our clients. All our clients are Australian based. All staff in our Philippines offices have technical expertise in technology solutions including a finance team to support this function.



Throughout FY2021 in response to public health orders and COVID-19 related risks, all our staff across Australia and the Philippines were supported to work remotely.

<sup>3</sup> More information on our office locations can be found on our website at <https://orro.group/working-with-us>



## Our supply chains

### Products

We procure a number of products to assist our day-to-day operations, in addition to the procurement of tools and equipment on behalf of our clients and customers. We do not directly retail or advertise these products; however, we often source electronic and IT equipment for our clients as needed. The products sourced for our operations include stationery, office equipment, personal protective equipment, computer and hardware devices and other IT electronics. This is in addition to non-tangible products we procure, such as cloud-based subscriptions, security software and other software licenses and subscriptions. The products sourced for distribution and installation with our clients include network equipment, computer and hardware devices and other hardware equipment.

### Services

We outsource several services for suppliers to conduct important work that assists our operations and business functions. These services include cleaning, security, maintenance, labour hire, recruitment, courier and delivery, professional services, insurance, education and training, B2B marketing and design, and travel services.

To ensure compliance with Australian and Philippines labour legislation, we have contracted HR and legal responsibilities to an employment relation partner. This allows us to ensure correct implementation of timesheet systems and other efforts to ensure full compliance with industry award and Fair Work legislation for Australia and Labor Code legislation for the Philippines.

## Measuring the risks of modern slavery

Modern Slavery according to the Act

Orro seeks to do business with respect for the rights of all people who work for us and those working in any of our supply chains. We consider the definition of modern slavery according to the Modern Slavery Act, which incorporates the following forms:

- Trafficking in persons
- Slavery
- Servitude
- Forced labour
- Forced marriage
- Debt bondage
- The worst forms of child labour <sup>4</sup>
- Deceptive recruitment for labour or services

Modern slavery occurs on a spectrum of human rights and labour rights abuses and is considered one of the gravest human rights violations. The International Labour Organisation outlines factors that are considered *indicators* of modern slavery, recognising that some of these are enough to constitute forced labour, while others are significant warning signs: <sup>5</sup>

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

We have made all efforts to ensure the definitions of modern slavery published by the ILO and Commonwealth Guidance, alongside the Act, have been utilised in our approach to identifying and addressing the risks of modern slavery.

---

<sup>4</sup> Note this includes extreme forms of child labour which involve the serious exploitation of children, including through enslavement or exposure to dangerous work that is mentally, morally, or physically harmful. Children are classified as any person under 18.

<sup>5</sup> [Indicators of Forced Labour](#), ILO, 2012

## How we measure risk

As per the Act, we have focussed our assessment of risk on the risk of harm to *people* rather than the risk to our business, although these may intersect.<sup>6</sup> Our responses to these risks are guided by the United Nations Guiding Principles on Business and Human Rights “Protect, Respect, and Remedy Framework”.<sup>7</sup>

The guidance outlines that a company’s response to risks should be measured according to the impact of the human rights violation occurring. The guidance indicates that where a business may have directly *caused* or contributed to the violation, it must remedy the negative impacts directly or through collaboration; whereas if a company is *directly* linked to the violation, it can use appropriate leverage to ensure remedy is provided.

These risks often intersect with one another as different risk and vulnerability factors go hand-in hand. The presence of these risks was informed by the following guidance and reports:

- [Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities](#), ABF, 2019
- [United Nations Guiding Principles on Business and Human Rights](#), 2011
- [Modern Slavery Risks, Rights and Responsibilities - A Guide for Companies and Investors](#), ACSI & KPMG, 2019
- [Global Estimates of Modern Slavery](#), International Labour Organisation, 2017
- [Global Slavery Index](#), Walk Free Foundation, 2017
- [Research in 43 commodities worldwide](#), Verite 2017
- [List of Goods Produced by Child Labor or Forced Labor](#), US Department of Labor ILAB, 2020
- [Trafficking in Persons Report](#), US Department of State, 2021
- [ITUC Global Rights Index](#), International Trade Union Confederation, 2021

---

6 Please note these risks were calculated in retrospect of our reporting year with assistance from a third-party sustainability services consultancy using spend data we extracted from FY2021

7 [United Nations Guiding Principles on Business and Human Rights](#), 2011



## Risks in our operations

As we operate primarily across the professional services industry, we are able to capture the modern slavery risk in our own operations by considering geographic risks. The leverage we have in our own operations is of course much higher than our supply chains. We do however acknowledge that the geographic risks outlined below for our workforce in the Philippines heightens our responsibility to ensure that appropriate standards, conditions and worker protections are extended to this workforce.

With regards to worker vulnerability, we note that our workforce consists of a very low percentage of foreign or visa workers, however we remain vigilant to ensure the rights of such workers are respected. Our business values diversity and will continue our progress in increasing the diversity of our staff across a range of different social factors including age, disability, gender identity, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation. As we improve diversity factors, we will maintain our awareness of different linked risk factors to minority groups and worker vulnerabilities.

Country	GSI Vulnerability <sup>8</sup>	ITUC Rating <sup>9</sup>
<p><b>Australia</b></p> <p>Our operations in Australia are conducted in the professional services industry, with very clear and direct oversight of our workers and the contracts, conditions and allowances they have. Due to the low industry risks in professional services and our compliance with the requirements of workplace laws in Australia, we consider our operations in Australia low risk.</p>	4.27	3: Regular violations of rights
<p><b>Philippines</b></p> <p>Although we also have direct oversight of the contractual arrangements with our staff in the Philippines, we recognise that operating outside Australia carries higher risks and provides more complexity for managing labour standards and transparency.</p> <p>Our workforce in the Philippines is also considered skilled labour, as our staff provide IT support and expertise, however location alone heightens the risk here. The 2021 ITUC Global Rights Index has named the Philippines as one of the world's ten worst countries for workers.<sup>10</sup></p> <p>Orro has Australian oversight of our Philippines operations, including members of the of the Orro board acting as directors of the employing entity.</p>	60.24	5: No guarantee of rights

8 The GSI vulnerability score indicates the presence of systemic, individual and environmental factors that precipitate modern slavery, 1 being low vulnerability and 100 being the highest. The country given the highest vulnerability rating is the Central African Republic at a score of 100.

9 The ITUC rating range from 1-5+ based on the degree of respect for workers rights, 1 being the best and 5+ being the worst rating.

10 [ITUC Global Rights Index](#), International Trade Union Confederation, 2021

## Charities

We have also considered risk in the context of the charitable donations we make to smaller and larger organisations such as The Generations Foundation. Where we choose to invest our funds for the benefit of people and planet, we also conduct the proper due diligence to ensure that people are protected.

During the FY2021 reporting period, Orro made \$110,000 worth of donations to The Generations Foundation – A children’s education charity founded by Liverpool Partners that currently supports primary and high school children in Uganda, Kenya, the Philippines & Vietnam.

Providing support services for vulnerable children in geographic locations of high risks can be associated with adverse human rights risks to children, where appropriate standards and practices are not upheld. The Generations Foundation ensures that best practice program partners are selected to provide the services to support children across these locations.

We are aware that The Generations Foundation requires appropriate child protection and ethical performance standards from recipients of the funds.

## Risks in our supply chains

On a case-by-case basis, we have requested further information from suppliers about their supply chains and sourcing standards due to concerns raised by the media. In FY2021 we requested further information from HP due to media relating to their KnowTheChain benchmark score. We will continue to do this for relevant high-risk suppliers.

## Procurement of goods

Using the guidance documents listed in *How we measure risk*, we have outlined the following products in our procurement spend as high risk, in order of spend:

- Hardware – network equipment
- Hardware – laptops and portable electronics
- Stationery
- Office Equipment

IT hardware will be an area of focus for Orro, as consumer electronic devices have been named one of the highest risk imports to Australia for modern slavery by the Global Slavery Index.<sup>11</sup> The industry risk for all the above categories lies in the manufacturing sector, which ILO has estimated accounts for 15 per cent of forced labour victim survivors worldwide.<sup>12</sup> Within the above procurement risk categories, there are several factors that feed into these risks:

11 [Global Slavery Index](#), Walk Free Foundation, 2017

12 [Global Estimates of Modern Slavery](#), ILO, 2017

## Country of origin

We have been unable to trace yet but hope to assess this risk in the future for unknown sources. We are aware that most consumer electronics are manufactured in Asia with some countries identified as having a high inherent risk of modern slavery and exploitative labour conditions in the electronics manufacturing process.<sup>13</sup>

## Raw materials

Certain raw materials used in electronic goods and componentry are manufactured using 'conflict minerals'. Exploitative labour practices are documented as prevalent in the mining of these minerals, that may include the worst forms of child labour. These high-risk minerals include tin, tantalum, tungsten, gold and cobalt. Other mineral components such as copper and zinc carry more moderate risks of modern slavery, with reports of child and forced labour less common but still found in artisanal mining operations.

## Other risks

During the risk assessment process, a media sweep was conducted for potential human rights concerns with our major suppliers over the previous 5 years. Several of our hardware and portable device suppliers had common allegations raised by the Australian Strategic Policy Institute (ASPI) regarding the use of forced labour in the Xinjiang Uighur Autonomous Region (UAR) of China.<sup>14</sup> We will continue to monitor press regarding labour in Xinjiang UAR, and the responses of these suppliers to the allegations.

### Case Study: KnowTheChain<sup>15</sup>

KnowTheChain is an independent benchmarking released biennially, scoring 49 major ICT companies against human rights performance indicators to increase the transparency of conditions and forced labour risks in global supply ICT chains. This industry already has known problems with conflict minerals commonly used in electrical components, and these companies are additionally battling opaque levels of supply and questionable conditions in the manufacturing value chain.

The lowest scoring companies in the most recent ranking include Broadcom, Infineon Technologies, Hexagon, Hikvision, Largan Precision, and Xiaomi with a score of zero.

No company in the benchmark exceeded 70 out of a possible 100, with the average score at only 30, showing that the industry has many areas of improvement.

The companies ranked in 2020 commonly lacked:

- Transparency on remedies provided to affected workers
- Supplier codes that included freedom of association and collective bargaining
- Evidence of a no-fee policy implemented for workers employed through agencies
- Ensuring agency fees are paid by the employer and costs are considered in purchasing practices
- Monitoring driven by worker initiatives i.e., local unions, civil society groups, or initiatives beyond auditing
- Evidence of available grievance mechanisms being communicated to workers

A number of our own suppliers were ranked in this benchmark. We will continue to monitor these ratings to inform our own considerations of modern slavery risk.

<sup>13</sup> [Global Slavery Index](#), Walk Free Foundation, 2017, [Forced Labour in the Production of Electronic Goods in Malaysia](#), Verite, 2014

<sup>14</sup> [Uighurs For Sale](#), Australian Strategic Policy Institute, 2020

<sup>15</sup> [ICT Overview](#), Know the Chain, 2020

## Procurement of services

Using the guidance documents listed in *How we measure risk*, we have outlined the following services as high-risk in order of spend:

- Repairs and maintenance
- Industrial labour hire
- Cleaning services

These services have been outlined as higher risk as they often involve subcontracting arrangements that obscure responsibility and accountability, tend to be low-skilled work, and the inconsistent regulation in the labour service industry in both Australia and the Philippines.<sup>16</sup>

## Actions we are taking to address modern slavery risks

### External consultation

The preparation and publishing of this statement signals the beginning of our journey to prioritise ethical sourcing. During FY2021 we consulted an external professional services company with human rights expertise to assist us in the identification and management of modern slavery risks. The deliverables included a Modern Slavery Risk Assessment (Risk Assessment) and a Modern Slavery Gap Analysis (Gap Analysis). These analyses were conducted with internal stakeholder input from representatives across the Orro business through consultation and workshops.

The Modern Slavery Risk Assessment was conducted to provide a snapshot of the risks of modern slavery in Orro's own operations and supply chain, informed by inherent risk factors. The results of this Risk Assessment have been used to inform our understanding of risks in this statement, and our future due-diligence activities will be based on these findings.

In addition, the Modern Slavery Gap Analysis was conducted to provide a snapshot of the suitability of Orro's existing processes and systems to address modern slavery. This was informed by the *Modern Slavery Act 2018 Guidance for Reporting Entities* and best-practice international standards, including but not limited to the ETI Base Code, the Corporate Human Rights Benchmark, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

This work commenced during the reporting period and finalised after the 30th of June 2021. We will be further reporting on our actions defined through this process in our FY2022 statement.

---

<sup>16</sup> [Global Slavery Index](#), Walk Free Foundation, 2017

## **Governance and policy commitments**

We have clarified our governance structure and the role and responsibilities of key staff members, ensuring appropriate accountabilities are in place as we continue to take actions to address modern slavery. Notably, the Chief Executive Officer carries organisational responsibility for modern slavery; the Chief Operating Officer has responsibility for organisational implementation of actions in relation to modern slavery; and the Chief People Officer is responsible for the actions to support compliance with labour legislation in our Australian and international operations.

## **Grievance mechanisms**

### **Grievance procedure**

We currently have an internal grievance procedure that lays out the expectations for staff to raise concerns about people or practices within our organisation. Internal grievances are handled by direct managers, or mediators where necessary, and are treated with strict confidentiality. During the reporting year, we commenced the creation of a group-wide Code of Conduct and associated whistle-blower mechanism.

Our website currently has a contact form for suppliers and customers to submit support requests, which can be used for any concern or query.

### **Whistleblower protections**

The handbook outlines protections for whistle-blowers raising concerns that may constitute modern slavery including:

- committing a criminal offence
- failing to comply with a legal obligation
- endangering the health and safety of an individual
- concealing any information relating to the above

The handbook outlines the protections, process, and expectations for those who report these concerns from within the organisation in good faith.

### **Due-diligence activity**

We may adopt a platform such as Sedex to support our future due diligence activities as we seek to understand more about our own suppliers and the facilities they source products from. We will also seek information on the risks of new products or services we procure, seeking informed advice where needed.

We are planning future training and development for staff members as we further develop our policies and actions in response to the risks identified.

### **The impact of COVID-19**

In FY2021, in response to public health orders and COVID-19 related risks, all our staff across Australia and the Philippines were supported to work remotely. As an IT solutions business Orro's transition to working from home was seamless and this limited job losses.

Due to the changes in public health orders across Australia and in the Philippines and the transition to remote working, the lower in-person attendance of our staff has resulted in a reduced procurement spend for some high-risk materials at Orro. Stationery and office consumables, which have risks of forced labour in the manufacturing sector, have been largely unrequired, reducing our residual supply chain risk.

COVID-19 also disrupted the availability of consumer electronics and components required for our operations and supply to our clients. This has meant that the options available to us during FY2021 were limited and spend was often allocated where supply was readily available. We will continue to monitor our suppliers.

Our approach to addressing modern slavery was also impacted by the pandemic. For example, Modern slavery related workshops and engagements scheduled to occur in person during FY2021 were facilitated remotely due to the pandemic and related business shutdowns.

During FY2021 we supported 400 businesses/clients to transfer their workforce online, thus reducing the risk of employee-job loss.

### **Assessing the effectiveness of our actions**

As we have been establishing the frameworks for our approach to modern slavery in FY2021, we will be building out the functions for assessing our effectiveness in future years. These may include: setting KPIs and targets to frame our due-diligence activities; encouraging and disclosing the transparency of our procurement supply chains; establishing a Modern Slavery Working Group to meet quarterly to discuss risks, concerns, changes and progress within the business; and reviewing the relevance of our approach by ongoing monitoring of changes and reports in the industry regarding modern slavery risk.

## Progress and commitments

Planned	Task	Status
FY2021	Engage external consultancy to conduct gap analysis, risk assessment and guide roadmap	Completed
FY2021-22	Formalise 3 Year Modern Slavery Action Plan and gain commitment from executive leadership	In progress
FY2022	Communicate commitment to Modern Slavery Action Plan and continuous improvement to business internally	Planned
FY2022	Workshop and training for key personnel in modern slavery risks, gaps, and Modern Slavery Action Plan targets	Planned
FY2022	Explicitly mention modern slavery in grievance channel	In progress
FY2022	Check availability of grievance to PH staff and contractors	In progress
FY2022	Run due diligence checks for PH staff/ vulnerabilities	In progress
FY2022	Disclose results of our Modern Slavery Gap Analysis and defined actions in our FY2022 statement.	Planned

## Compulsory declaration

### Consultation with Entities Owned or Controlled

The preparation of this statement has been informed by a self-assessment questionnaire of Orro's supply chain and operations, with a gap analysis of existing systems and policies to address modern slavery risks. Responsible members of staff were presented the results of the risk assessment and gap analysis and provided opportunity to outline any areas or information that may have been overlooked. These responsible members included representation from HR, senior leadership, procurement functions, and sustainability personnel. No subjects were raised as overlooked by this group. The statement was then reviewed and signed-off by each head of department, incorporating any additions, adjustments, or changes before being finally reviewed and approved by the board and signed by the CEO.

### Principle governing body approval

This voluntary Modern Slavery Statement was approved by our board, the principal governing body of Orro as defined by the Modern Slavery Act 2018 (Cth)<sup>17</sup>("the Act") on **25 January 2023**.

### Signature of Responsible Member

This modern slavery statement is signed by a responsible member of the Orro Board as defined by the Act:<sup>18</sup>



Jonathan Lim

<sup>17</sup> Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

<sup>18</sup> Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorized to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.