



# **NRI Australia Limited Modern Slavery Statement**

This statement sets out NRI Australia Limited's commitment to tackling and eradicating modern day slavery from our supply chains and ensuring our policies and procedures protect the rights of all employees and those companies to whom we provide services to.

This statement is for NRI Australia Limited (ACN 070 045 117) covering the financial year ending 31 March 2024.

# Our business, structure and supply chain

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## Background

Born and bred in Australia, for over two decades, NRI Australia Limited has been providing businesses with innovative, high quality, and cost-effective services.

Complementing strong organic growth, NRI Australia Limited has made several strategic acquisitions and has developed a reputation as a leading provider of consulting, professional and managed services. In 2003, NRI Australia Limited entered the next phase of growth, listing on the Australian Stock Exchange. In September 2016, NRI Australia Limited was acquired by Nomura Research Institute, a Japanese-based consulting and IT solutions group listed on the Tokyo Stock Exchange.

With over 12,000 staff across the world, NRI's financial firepower, broad consulting capabilities and global footprint strengthening NRI Australia Limited's client proposition. For more information on NRI, visit the NRI website and view their corporate video.

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## Our business

NRI Australia Limited partners with our clients to deliver a wide range of transformative digital solutions, from business strategy and consulting through to infrastructure and managed IT services. Designing, implementing and managing digital solutions that are as personalised as they are progressive, we're backed by a global reach that makes us a truly game-changing alternative in the digital services space – with local decision-making and authority. And we're powered not just by technology, but by passionate people who are fearlessly committed to getting it right for our customers.

## Organisation structure

NRI Australia Limited is an Australian Public Company. NRI Australia Limited's board of directors are made up of highly skilled and experienced leaders who act within the best interests of our organisation to ensure long term growth and sustainability. Our leadership team comprises of talented industry experts who strategically guide our business within the best interests of our clients and employees. More information on our board of directors and our leadership team can be found on our website.

At NRI Australia Limited, we operate across four lines of business working in a matrix structure, which means people work with multiple different stakeholders across our business. Our Lines of Business all work together to deliver responsive, tailored and innovative solutions to our customers.

NRI Australia Limited operates in eight locations across Australia as well as in Manila, in the Philippines and Gurgaon in India.

NRI Australia Limited is headquartered in Perth, Australia, and has other Australian offices located in Sydney, Melbourne, Brisbane, Canberra and Adelaide.

As of 31 March 2024, NRI Australia Limited had approximately 1560 employees. The majority of the workforce consists of highly trained and skilled IT Consultants, Technicians, Service Delivery and Sales professionals.



NRI Australia Limited is a subsidiary of NRI AU Holdings and NRI AU Holdings governs, and has day to day oversight and management of NRI Australia Limited and its subsidiaries, including the following entities which it has acquired or established over recent years:

1. SMS Consulting Group Ltd;
2. SMS Management & Technology Limited;
3. M&T Resources Pty Ltd;
4. SMS Employees Pty Ltd;
5. ASG Group Pty Ltd
6. Prag Tech Pty Ltd
7. NRI New Zealand Limited
8. SMS M & T Philippines Inc
9. ICT India Private Limited
10. Velrada UK Limited
11. 1 ICT Pty Ltd;
12. Group 10 Consulting Pty Ltd;
13. Pragma Partners Pty Ltd, and
14. Velrada Capital Pty Ltd.

(collectively the Controlled Entities).

NRI Australia Limited consulted the relevant companies above whom we own or control in the development of this statement.

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## **Our supply chain**

The procurement process provides detailed governance and templates which are used to ensure the desired procurement outcome is achieved when servicing both internal and external purchasing requests. It also provides details relating to the purchasing of new infrastructure hardware, software and licenses – the renewal of hardware and software support licenses and user application licenses – the handover/ transition of hardware, software and licenses that relate to ongoing project support commitments. These processes are also ideally positioned for compliance, induction and education within NRI Australia Limited.

Procurement for NRI Australia Limited is managed nationally through the Business Management Office (BMO) where all procurement requests for NRI Australia Limited and all client accounts are sent. NRI Australia Limited engages with suppliers through our procurement team for all services or products from NRI Australia Limited's existing partners.

Some of the BMO deliverables that may be relevant to purchasing are Commercial Contract Management, Purchasing Strategy, Bid Registration, Vendor Grading, Product Selection, Supplier/Vendor Certification or Accreditation or Competency Development.

NRI Australia Limited's existing partners may be long-standing suppliers whose products and services were used as solutions with our clients or whose products and services we utilise internally.

Our operations expand across the areas of provision and delivery of products, research and development and direct employment of employees.

In the 2024 financial year, NRI Australia Limited engaged directly with around 179 approved suppliers from fifteen countries, including Denmark, United Kingdom, Philippines, Singapore, Switzerland, India, Ireland, Netherlands, Japan, Romania, Germany, New Zealand, Canada, Hong Kong, and the United States of America. The supply chain of products and services that contribute to our operations include assembling products from overseas factories and importation of certain products.

Some of our existing suppliers do have clauses in their contracts, which addresses some aspects of modern-day slavery and statutory requirements. NRI Australia Limited has started conducting a short evaluation with our suppliers, particularly when onboarding brand new suppliers. At this stage 10-15% of suppliers have been part of the due diligence process. We are continuing to work through a plan to complete an assessment with the remaining suppliers to ensure they are all compliant with the Modern Slavery Act requirements. When new suppliers are on-boarded the newly on-boarded supplier is provided with the NRI Australia Limited Supplier Code of Conduct, which relates to a number of government standards and requirements. NRI Australia Limited ask that the relevant supplier reviews the Code of Conduct and that by signing the supplier acknowledges they understand and adhere to Australian standards for modern slavery, bribery and corruption, among others. The signed Supplier Code of Conduct is then stored within NRI Australia's supplier and vendor database and noted in the system as being received.

# **Risk of modern slavery practices in NRI Australia Limited's operations and supply chains**

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As NRI Australia Limited is also a services-based business, we do not manufacture any products. Occasionally NRI Australia Limited does directly procure products for its clients including IT hardware (such as laptops and monitors etc.), however, these products are sourced through the supplier's Australian operations.

NRI Australia Limited's procures IT hardware is procured from tier one industry providers, which reduces the risks of NRI Australia making purchases from countries where slavery may be taking place. For this reason, NRI Australia Limited values the importance of tier one suppliers, who must adhere to local labour laws and NRI Australia's Supplier Code of Conduct, thereby reducing the risks of modern slavery at this level of the supply chain. In all circumstances, NRI Australia takes all reasonable steps to ensure it sources responsibly.

NRI Australia Limited's supply chain includes suppliers of the following goods and services: IT equipment, hardware, software, cleaning contractors for offices and office supplies, among others.

As discussed above, NRI Australia Limited also has an office located in Manila in the Philippines. The Philippines is identified as a higher-risk country under the Modern Slavery Index published by the Walk Free Foundation. The Global Slavery Index conducted in 2023 found that the Philippines ranked seven out of twenty-seven countries within the Asia Pacific region for prevalence of modern slavery. In managing the Manila office, NRI Australia Limited seeks to comply with all laws and regulations of the Philippines.

As discussed above, NRI Australia Limited also has an office located in Gurgaon in India. India is also identified as a higher-risk country under the OECD Guidelines for Multinational Enterprises and the Modern Slavery Index published by the Walk Free Foundation. The Global Slavery Index conducted in 2023 found that India ranked six out of twenty-seven countries within the Asia Pacific region for prevalence of modern slavery. In managing our Indian office, NRI Australia Limited seeks to comply with all laws and regulations of India.

NRI Australia Limited has supplier relationships with companies in the United States, Denmark, United Kingdom, Hong Kong, Philippines and Singapore. NRI Australia Limited's suppliers are larger organisations, and for this reason, NRI Australia Limited considers that the risks of modern slavery are likely beyond the first tier of NRI Australia Limited's supply chains, where NRI Australia Limited's suppliers may outsource some tasks and work, including for example, manufacturing and development of the products/services may be outsourced by NRI Australia Limited's suppliers to high risk countries overseas, which may increase the risk of exploited labour. That said, NRI Australia Limited procures products from Tier one industry providers, it is not likely that these Tier one providers outsource manufacturing to countries where there is a risk of exploited labour.



# Actions NRI Australia Limited takes to assess and address these risks

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NRI Australia Limited adopts a number of processes and procedures to assess and address risks of modern slavery, as outlined below. NRI Australia Limited and its controlled entities see themselves as modern day advocates in the industry and understand the role they play in setting an example.

NRI Australia Limited strives to ensure total compliance with ethical codes, laws and regulations and is committed to respecting the human rights of all people impacted by its business activities. NRI Australia Limited recognises its responsibility, as part of one of the leading global groups of companies in the IT services industry and the professional services industry, NRI Australia Limited, to contribute to the creation of a sustainable society.

Our business is committed to a process of upholding practices against modern slavery and human trafficking in our supply chains or in any part of our operations. We commit to acting ethically and with integrity in business relationships. Our commitment is also supported by our policy framework, which is outlined in more detail below.

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## Our code of conduct and policy framework

The board has the responsibility for establishing policies and ensuring that these are implemented. The board delegates this responsibility to the leadership and management teams within NRI Australia Limited.

With regards to modern day slavery and our employees, we will need to determine what the best approach will be to create awareness of the signs of modern-day slavery for our employees.

NRI Australia Limited's Code of Conduct and Policy Framework set the behavioural standards for NRI Australia Limited employees, board members, contractors and consultants. The Code of Conduct and policy framework helps set a consistent global approach for all NRI Australia Limited employees. Policies and Procedures are reviewed every year to ensure they align and comply with all the relevant regulatory requirements.

At NRI Australia Limited, our values underpin our everyday actions and we use them as a guiding principle in our conduct and working relationships. NRI Australia Limited's values are:



- Hungry for mutual success
- Honest & open
- Passionate & loyal
- People powered

At NRI Australia Limited, we have several policies and procedures which support a zero-tolerance approach to modern day slavery in our business, including primarily NRI Australia Limited's Code of Conduct which sets out our expectations of all employees of NRI Australia Limited and expectations in respect of dealings with clients, suppliers and contractors. All employees are expected to act in a manner consistent with the principles of:



- (a) integrity and fairness;
- (b) acting honestly, co-operatively and being trustworthy;
- (c) taking responsibility for our own actions and being accountable for the consequences;
- (d) respect for others; and
- (e) compliance with the law and regulatory bodies guidelines.

While the globalisation of supply chains and opportunities created in the workforce for women have increased, women remain at risk of human rights abuses. In this regard, NRI Australia Limited has a Domestic and Family Violence policy in support of women in our organization, given the disproportionate impact domestic and family violence often has on women.

NRI Australia Limited strongly encourage and support diversity across all levels of our business to improve business performance, encourage innovation, attract and retain the best talent and provide excellent customer outcomes. NRI Australia Limited's Diversity Policy sets out our fundamental principles and diversity initiatives across the organisation.

NRI Australia Limited also has a Recruitment Policy to ensure all recruitment decisions are in line with our values and are consistently and fairly applied.

All staff members at NRI Australia Limited are responsible for being aware of the policies whether they are ethical, legal or policy and need to ensure they apply it to their jobs. Our Managers and Executives are responsible for creating and promoting environments in which all persons comply with their obligations to ensure that all business is conducted in an ethical manner. All of NRI Australia Limited's policies and procedures are communicated to all employees, including via its internal intranet.

NRI Australia Limited expects its suppliers to maintain the highest standards of business ethics and become familiar with, and comply with, all laws that are relevant to the supplier relationship, including the laws that govern NRI Australia Limited.

NRI Australia Limited has Supplier Code of Conduct, which identifies that suppliers have responsibilities to ensure various standards are met by the supplier, including in respect of modern slavery, human rights and labour practices, diversity and inclusion and work health and safety matters. This helps to ensure that suppliers prevent and detect any unlawful conduct.

The Supplier Code of Conduct also enables NRI Australia Limited to audit any of its suppliers to ensure the supplier is abiding by and appropriately managing each of the standards identified within the Supplier Code of Conduct, and to ensure the supplier is complying with all applicable laws and regulations.

Each new supplier of NRI Australia Limited will be required to acknowledge and sign the Supplier Code of Conduct to ensure they understand the expectations and obligations owed to NRI Australia Limited.

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## **Our policies and governance**

NRI Australia Limited do its utmost to act with integrity, honesty, trust, respect and fairness. If employees are aware of any violation of the law or company rules, including any modern slavery practices, NRI Australia Limited encourage employees to contact NRI's Global Whistleblowing hotline immediately. Reports through the hotline are managed by an independent firm and all reports made are anonymously, treated in the strictest of confidence and investigated as required by an appointed third party.

NRI Australia Limited has a Grievance Procedure in place, which enables employees to raise concerns about any issues in the workplace and its operations, including in relation to modern slavery practices.

NRI Australia Limited is committed to transparency, corporate governance and accountability. NRI Australia Limited has a Risk Committee who are responsible for the effective oversight of all key risk and compliance issues, the overall control environment and the review and recommendation to the board for approval of NRI Australia Limited risk management policies. NRI AU Holdings operates an internal audit team which ensures that the processes and appropriate internal controls are in place at NRI Australia Limited.

NRI Australia Limited also seeks to uphold its responsibility in relation to the environment and climate change and views these matters as essential for the long-term performance and sustainability of the business. NRI Australia Limited is currently certified to the latest version of the standard ISO14001:2015, which demonstrates our commitment to being environmentally responsible by preventing pollution, reducing waste and use of energy and resources. Where possible NRI Australia Limited reduce, re-use and recycling materials.

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## Training

Training is an integral part of NRI Australia Limited compliance framework. It ensures that all employees are aware of their responsibilities. All new employees are required to complete an online induction course. During the onboarding and induction of new employees, this process covers aspects of its values, code of conduct, key policies, health and safety, discrimination, bullying and harassment. All NRI Australia Limited employees and contractors are required to complete refresher training every two years.

# How NRI Australia Limited assesses effectiveness of actions being taken to assess and address these risks

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NRI AU Holdings has oversight of NRI Australia Limited's operations, and the annual review conducted by NRI Australia Limited as part of its Audit & Compliance Committee agenda, which meets quarterly. The Committee undertakes a review of, NRI Australia Limited's responses to modern slavery risks and the actions taken by the business and provides recommendations on methods to improve the assessment of the effectiveness of actions being taken.

Further to this, as part of the Audit & Compliance Committee agenda, the Committee conducts regular reviews of risk assessment processes to ensure if and when new operations are commenced in countries or regions, that any new risks associated with modern slavery are identified and assessed as appropriate.

NRI Australia Limited, under the governance of NRI AU Holdings, is committed to assessing the effectiveness of actions being taken to address the risks of modern slavery within its operations.

# Consultation

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NRI Australia Limited has consulted internally within NRI Australia Limited in respect of the preparation of this statement, including review by the NRI AU Holdings Board prior to finalizing the statement.

NRI Australia Limited has consulted through internal reviews at an NRI Australia level of the statement and relevant information provided from NRI Australia Limited. This statement has been prepared in consultation and co-operation with the management of NRI Australia and with the Human Resources Department at NRI Australia prior to finalising this statement.

This statement was approved by the Board of NRI Australia Limited on 23 August 2024.

Signed,

Handwritten signature in Japanese characters: 山崎朋広

**Tomohiro Yamazaki**

President at NRI Australia Holdings Pty Ltd.

23 August 2024