



Modern Slavery Statement - 2022

Objective Corporation Limited

Document ID: A2602420
Version: 1.0
Date: 21 December 2022

[OBJECTIVE.COM](https://www.objective.com)

INTRODUCTION

This Modern Slavery Statement (“**Statement**”) is prepared by Objective Corporation Limited (ABN 16 050 539 350) and covers the reporting period 1st July 2021 to 30 June 2022 (“**FY2022**”).

This is our first Statement under the Australian Modern Slavery Act 2018 (Cth) (“**Act**”), which addresses the mandatory criteria set out in section 16 of the Act (“**Mandatory Criteria**”).

Objective is committed to acting with integrity in all our business dealings and operations and we fully expect our suppliers to meet the same high standards that we set for ourselves. We have a zero-tolerance attitude to Modern Slavery for ourselves and our supply chain.

MODERN SLAVERY STATEMENT – MANDATORY CRITERIA:

1. Identity of reporting entity (Mandatory Criteria 16(1)(a))

For the purposes of the Act, the reporting entity is Objective Corporation Limited (ABN 16 050 539 350) (“**OCL**”), whose registered office is at Level 30, 177 Pacific Highway, North Sydney, NSW 2060, Australia. However, although this Statement is only required for OCL as the reporting entity, it also applies to all of OCL’s subsidiary entities, a complete list of which is set out in the attached Annexure A (together referred to as “**Objective, we, us, our**”).

2. Structure, operations and supply chains (Mandatory Criteria 16(1)(b))

Structure

Objective Corporation Limited is an Australian public company, listed on the Australian Securities Exchange (ASX: OCL), and is headquartered in Sydney, Australia.

All of OCL’s subsidiary entities (as at 30 June 2022) are set out in the attached Annexure A, which are each 100% directly owned by OCL.

Operations

Objective is a leading provider of digital government software solutions that drive stronger communities and nations. Our solutions offer rich functionality focused on content management, planning and building processes and regulatory compliance. We develop software solutions to help government workers work smarter with secure access to the information they need to make decisions, anywhere on any device. Our clients are primarily government sector entities including many large departments and agencies but also include commercial entities operating in financial services and highly regulated industries.

As at 30 June 2022, we had a headcount of around 450 people, and our operations included 15 offices globally:

- Australia: Sydney, Wollongong, Melbourne, Brisbane, Adelaide, Canberra, Perth
- New Zealand: Wellington, Palmerston North
- United Kingdom: London, Edinburgh

- United States of America: Marietta GA, Washington DC, Charlotte NC
- Asia-Pacific: Singapore

Our procurement and human resources functions are largely centralised at our Sydney headquarters, which provides us with greater visibility over our supply chain and workforce.

Our total revenue for FY2022 was AU\$107 million.

Our software solutions are developed, marketed and sold by Objective personnel directly employed by us. We do not outsource any of our software development nor do we operate any call-centres.

Supply Chain

Our key suppliers include:

- data centre IT hosting service providers;
- technology (e.g. laptops, monitors, etc.) and internet suppliers;
- office space landlords; and
- business software application suppliers,

and they are commonly direct suppliers of products and services to us.

In FY2022, we engaged directly with close to 200 suppliers, the vast majority of which were located in either Australia, the United Kingdom or the United States of America.

3. Risks of modern slavery practices in Objective's operations and supply chain (Mandatory Criteria 16(1)(c))

In 2022, Objective's legal department undertook a risk assessment regarding any possible presence of Modern Slavery in our operations as well as in the operations of our key suppliers.

In respect of our own operations, we did not identify any presence of Modern Slavery. This was predominantly due to us not outsourcing any software development work, and we have a sophisticated human resources function that is responsible for managing the hire of all employees and contractors. We assessed the risk of Modern Slavery in our operations as low given that our operations require skilled work performed by Objective's employees and contractors.

In respect of our supply chain, we assessed the risk as relatively low, due to:

- the nature of the goods and services we acquire in connection with our business;
- us typically contracting directly with the supplier (which provides more visibility over worker arrangements and the types of supply being made and by whom);
- the operations and nature of most of our suppliers;
- the highly technical operations and nature of our business;
- many of our key suppliers have their own anti-Modern Slavery practices and statements; and
- the fact that the vast majority of our suppliers are primarily located in Australia, the United Kingdom or the United States of America.

However, whilst we see the risk as relatively low, we do acknowledge that there are certain more risk-prone areas in our supply chain, where there is the potential for Modern Slavery to exist, as follows:

- Office Cleaning: Noting the nature of work in this sector, and the use of less skilled or migrant labour, we acknowledge that there is an inherent risk of labour exploitation with these suppliers; and
- Hardware Suppliers: whilst most of our hardware suppliers (e.g. laptop and monitor suppliers) are located in lower risk countries, we note that the manufacturing of the hardware, including some components, may occur in higher risk countries; and there is limited ability to practically determine whether any Modern Slavery exists at the component level.

We manage these risk areas as follows:

- In regards to Office Cleaning, we typically have to use the office cleaners dictated by the landlord of our offices; however, most of these landlords are large reputable organisations (that have published Modern Slavery statements), and our offices are mostly situated in lower risk countries, so we see the risk as relatively low; and
- In regards to Hardware Suppliers, we use large reputable global brands of equipment, and rely on their Modern Slavery practices and statements to limit the risk.

4. Actions taken to assess and address risks (Mandatory Criteria 16(1)(d))

Accountability for addressing Modern Slavery risk in our operations and those of our suppliers is multi-departmental. The Board of Directors of OCL is ultimately responsible for Objective's efforts to avoid Modern Slavery in our operations and those of our supply chain. Our legal department has raised awareness at the executive level for senior business managers to support this initiative.

Notwithstanding that the risks of the presence of Modern Slavery in our operations and those of our supply chain are assessed as relatively low, we have taken the following actions to address the risks:

- **Modern Slavery Position Statement:** we have provided a copy of this Statement to all of our employees and contractors, globally, and also made it publicly available on all of our websites – to raise awareness and as a clear expression of our commitment to avoid the presence of Modern Slavery in our operations and those of our supply chain.
- **Supplier Code of Conduct:** we are in the process of creating a Supplier Code of Conduct (which includes provisions around our expectations and requirement that there is no Modern Slavery within the operations of our suppliers); and this will be published on our websites, again as a clear expression of our commitment to avoiding the presence of Modern Slavery in the operations of our supply chain. Our legal department manages the engagement of all suppliers, from a contractual perspective, and wherever possible they will require the Supplier Code of Conduct (or anti-Modern Slavery clauses) to form part of our contract with any new supplier going forwards.
- **Modern Slavery Risk Assessment:** our legal department performed a Modern Slavery Risk Assessment in respect of our operations as well as our supply chain.
- **Whistleblowing Policy:** we have a well-established Whistleblowing policy, under which concerns about our operations, or those of our supply chain, can be disclosed by Objective workers without fear of retaliation.
- **Modern Slavery Questionnaire / Due Diligence:**

- In 2022 we produced a comprehensive Modern Slavery Questionnaire, which includes a number of questions for suppliers to answer that are designed to indicate whether the supplier is engaging in any Modern Slavery within its operations, or there is a risk of that;
- This Modern Slavery Questionnaire was provided to our top 20 key suppliers (by spend) that don't already publicly report on Modern Slavery.
- None of the responses received from these suppliers gave rise to a concern that any of these suppliers were at risk of Modern Slavery, and the responses did not highlight any need for us to conduct further investigations or due diligence into any of these suppliers.
- It is now a requirement that every new prospective supplier must complete our Modern Slavery Questionnaire, to our satisfaction, before we accept them as a supplier.

As regards remediation, we have not found any examples of Modern Slavery either within our own operations or those of our supply chain, so no remediation has been necessary. However, should an incident of Modern Slavery be discovered in our supply chain, we would engage with the supplier to resolve the situation, with the key focus being on the welfare of any potential victims.

Ultimately, we would terminate the relevant supplier arrangement if an appropriate resolution is not achieved.

5. Effectiveness of above Actions (Mandatory Criteria 16(1)(e))

We are cognisant that we only met the reporting threshold under the Act on 30 June 2022, when our revenue surpassed AU\$100 million. We are therefore at the start of our journey towards the goal of having robust and effective practices and procedures that ensure there is no Modern Slavery within our operations or the operations of our supply chain.

Our legal and procurement teams work together to review our Modern Slavery processes and procedures, to evaluate their effectiveness. Taking into account their review and effectiveness assessment of the above actions, we note as follows:

- The actions taken to-date include a number of important steps towards the above goal, particularly noting the short period since meeting the reporting threshold and us making this first Statement, but we recognise we have much more to do;
- We are very comfortable no Modern Slavery exists within our own internal operations (anywhere globally), due to our centralised human resources function and comprehensive pre-employment checks that are run on every new employee and contractor, and noting the low risk countries we operate in. As regards our supply chain, whilst we see it as a relatively low risk, it is obviously harder to make guarantees in relation to third-party suppliers, which we have no control over and limited visibility of what may be happening 'behind closed doors';
- We are also conscious that we have so far only provided our Modern Slavery Questionnaire to a relatively small portion of our supply chain. So, during the course of our financial year 2023, we will expand the Modern Slavery Questionnaire and due diligence activities to a much larger segment of our suppliers, with a particular focus on higher risk areas such as cleaning providers, hardware manufacturers, and any suppliers located in higher risk countries; and

- We are also conscious of the inherent weaknesses with relying on suppliers completing a Modern Slavery Questionnaire under a self-assessment model, so we will evaluate whether there are more sophisticated, practical and effective ways to assess Modern Slavery within our supply chain.

6. Process of consultation with Objective group entities (Mandatory Criteria 16(1)(f))

OCL and all of its owned and controlled entities (as listed in Annexure A) operate under a uniform delegated authority policy for governance which includes prioritising the absence of Modern Slavery from our operations and those of our supply chain. All lines of business within all of these entities share the same Executive Leadership Team, which ensures a consistent and transparent approach across our entire organisation.

Additionally, the vast majority of Objective's procurement is managed out of our Sydney headquarters. Accordingly, this Statement has been prepared in consultation with our procurement team in Sydney. Where procurement activities have been undertaken by any of the subsidiary entities (as listed in Annexure A), they are always managed by our legal department, to ensure consistent treatment of suppliers, appropriate contract terms are put in place, and Modern Slavery assessments are performed.

7. Approval of this Statement (Mandatory Criteria 16(2))

This Statement was approved by the Board of Directors of Objective Corporation Limited.



Tony Walls

Chief Executive Officer
Objective Corporation Limited

20 December 2022

Annexure A

OBJECTIVE CORPORATION – GROUP

All of Objective Corporation Limited’s subsidiaries and controlled entities (as at 30 June 2022), and its ownership percentages, are stated below:

Company Name	Country of Incorporation	Ownership
Objective RegTech Pty Limited	Australia	100%
The Objective Corporation Limited Employee Share Trust	Australia	n/a
Objective Corporation Solutions NZ Limited	New Zealand	100%
Alpha 88 Limited	New Zealand	100%
Objective Corporation Singapore Pte Limited	Singapore	100%
Objective Corporation North America Inc.*	United States of America	100%
Objective Corporation USA Inc.	United States of America	100%
Objective Corporation UK Limited	United Kingdom	100%
Objective Keystone Limited	United Kingdom	100%

* Includes ownership interest in Simflofy, Inc. (a United States of America entity), which was acquired through a forward triangular merger that closed on 17 March 2022.