



**ClockShark**

## **MODERN SLAVERY STATEMENT FY2022**

### **Introduction**

The Modern Slavery Act 2018 (Cth) (the Act) defines ‘modern slavery’ as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

The Simpro Group Pty Ltd and its related bodies corporate, including AroFlo Innovations Pty Ltd and ClockShark LLC (together, Simpro Group) is committed to sourcing products and services in a transparent, ethical and responsible manner. Simpro Group has a zero-tolerance approach to modern slavery. It is committed to acting with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to assess and manage modern slavery risks.

This is Simpro Group’s first modern slavery statement. This statement describes the steps Simpro Group has taken to assess modern slavery risks within its operations, inclusive of its supply chain, during the period 1 January 2022 to 31 December 2022, and details the actions being taken to help address these risks. These include clarifying and updating policies and procedures, implementing modern slavery training as well as supplier risk assessment procedures.

These steps are helping Simpro Group move towards a more informed and systematic approach to eliminating all forms of modern slavery in our supply chain.

### **Simpro Group’s structure, operations and supply chain**

#### **Our structure and operations**

Simpro Group’s operations are divided into three main divisions, each providing task/time management Software as a Service solutions to businesses:

- Simpro: described here <https://www.simprogroup.com/> (Simpro)
- AroFlo: described here <https://aroflo.com/> (AroFlo)
- ClockShark: described here <https://www.clockshark.com/> (ClockShark)

Simpro is headquartered in Brisbane, Australia and Simpro Software Pty Ltd (ACN 121 998 945), a wholly-owned subsidiary of The Simpro Group Pty Ltd, is its Australian operating entity, with its registered office at Building 17 Garden City Office Park 2404 Logan Road Eight Mile Plains QLD 4113 Australia. Simpro carries on business in Australia, New Zealand, North America, Europe and Asia through various wholly-owned subsidiaries of The Simpro Group Pty Ltd, including Simpro Software Ltd (Company Number 06983493) in the UK.

AroFlo is headquartered in Melbourne, Australia and AroFlo Innovations Pty Ltd (ACN 638 665 362), an entity with the same ultimate parent company as The Simpro Group Pty Ltd, is its operating entity, with its registered office at 2nd Floor/12 Maroondah Hwy, Ringwood VIC 3134 Australia. AroFlo carries on business in New Zealand under this same operating entity.



ClockShark is headquartered in California, United States and ClockShark, LLC, a wholly-owned subsidiary of The Simpro Group Pty Ltd, is its operating entity, with its registered office at 900 Fortress St #100, Chico, CA 95973, United States.

Simpro, AroFlo and ClockShark all operate in the same industry sector.

**Our supply chain**

As a technology business, Simpro Group’s key spend categories are:

<b>Categories</b>	<b>Description</b>
Third party professional services	Professional services providing services such as software engineers, accounting, financial and legal services.
IT software solutions	IT software, cloud platform services and computer systems.
IT hardware and maintenance	IT hardware used by our employees. IT hardware resold to our customers.
Marketing	Advertising and marketing services and products.
Facilities	Office operations such as leasing, cleaning, security and repairs and maintenance, and office consumables across our 8 offices.

The geographic footprint of our direct suppliers includes (but is not limited to) Australia, New Zealand, North America, Europe and East Asia. We appreciate that these suppliers also have their own, often global, supply chains that form part of our broader supply chain.

## **Modern slavery risks in Simpro Group’s operations and supply chain**

Recognising the prevalence of modern slavery and the global nature of logistics and supply chains, Simpro Group acknowledges that modern slavery practices may be present in its operations and supply chains.

**Risks in our operations**

The risk that our operations have caused, contributed or been linked to modern slavery is low.

This is because:

- The domestic operations of participants in the technology industry are considered to be a lower risk industry for modern slavery.



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- Simpro, AroFlo and ClockShark comply with employment laws which regulate the recruitment and remuneration for our direct workforce.
- Simpro, AroFlo and ClockShark have People & Culture specialists who support us with employment law compliance.
- Employees are free to join any union or association.
- As a technology company, most of our workforce are tertiary educated professionals.

### **Risks in our supply chain**

In assessing our supply chain, we considered sector and industry risks, product and services risks, and geographic risks.

The following procurement categories relevant to our business may carry an inherently higher risk of modern slavery:

- IT and telecommunications (hardware and software)
- Marketing and events (including merchandise and catering)
- Facilities (including cleaning, security and repairs and maintenance, and office consumables)
- Other office expenses (courier services and business travel)

The increased risk profile of these categories can be due to a combination of factors such as:

- The prevalence of subcontracting arrangements leading to decreased supply chain transparency
- Labour intensive work coupled with low barriers to entry
- Workers from vulnerable backgrounds including migrant workers
- Operations in countries with higher risks for modern slavery

From our modern slavery assessment, we ascertained that during the Reporting Period our major suppliers are technology companies domiciled in Australia or the United States. The technology industry in Australia and the United States (within which our largest suppliers by spend operate) have lower risks of modern slavery in their direct operations. However, their supply chains, like most businesses, carry a higher risk by virtue of raw material extraction, component manufacturing, assembly and logistics. Workers in these supply chains are often low-skill or migrant workers working in countries with a higher prevalence of modern slavery, making them more vulnerable to modern slavery practices.

The risk that our business has caused or contributed to modern slavery in our supply chain is low. However, like most, if not all similar entities operating in our sector, there is inherent risk that our business is linked to modern slavery via our suppliers and their respective supply chains.



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## **Actions taken during Reporting Period**

### **Employees**

#### ***Compliance***

The People & Culture team ensure compliance with local labour, health, safety and employment laws as well as collective agreements and Industrial Awards.

#### ***Working rights and legal working age***

During the recruitment process, the People & Culture team confirm working rights and that those we recruit are of legal working age.

### **Policies and procedures**

We implement policies to ensure compliance with local labour, health, safety and employment laws as well as collective agreements and Industrial Awards. The policies outline the standard of behaviour we expect of our employees, working conditions they are entitled to, and how to report any issues or concerns. Key policies and procedures include:

- Code of Conduct
- Discrimination, EEO, Bullying and Harassment Policy
- Whistleblower Policy
- Workplace Health and Safety

Employees can access electronic versions of these policies. The policies are also made available to new employees.

### **Remediation process**

Our Whistleblower Policy sets out the processes and protections for employees to raise concerns (including anonymously) about alleged misconduct, including improper conduct relating to modern slavery.

We are committed to providing for, or co-operating in, remediation in the event that our business is found to have caused or contributed to modern slavery impacts.

## **Actions taken after Reporting Period**

In May and June 2023, we commenced steps to improve and strengthen our risk management process. We adopted a pragmatic risk-based approach with a focus on continuous improvement to assess and address modern slavery risks within our operations and supply chain. A summary of our actions is set out below.



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### **Modern Slavery Questionnaire and Supplier Code of Conduct**

We issued a modern slavery questionnaire to a subset of our suppliers. The questionnaire requested information on suppliers' approach to assessing and addressing modern slavery risks.

We issued our Supplier Code of Conduct (Code) to a subset of our suppliers. This Code sets out our minimum expectations and requirements in areas such as modern slavery, human rights, labour, environment, health and safety and anti-bribery and corruption for suppliers providing goods and services to the Simpro Group. The Code is published here <https://www.simprogroup.com/legal>. We will review and update the Code periodically to ensure it aligns with our business' priorities and stakeholders' expectations.

### **Modern Slavery Policy**

We created a new Modern Slavery Policy, which we rolled out to all our employees. This policy clearly explains what modern slavery is and the pathways for our employees to ensure they understand how to raise and manage any identified or potential modern slavery issues affecting us or our suppliers.

### **Learning**

We commenced the rollout of mandatory modern slavery training for employees who have involvement with the business' procurement process.

### **Standard contractual terms**

We reviewed our template services agreement and drafted modern slavery clauses for inclusion into new contracts with new suppliers, and contracts that are up for renewal. These standard contractual terms include the requirement for suppliers to comply with our Code and to notify us of any identified instances of modern slavery in their operations or supply chain.

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

Simpro Group acknowledges that industry risk is only one of the factors in assessing overall supplier risk. However, as we continue to enhance our procurement, due diligence and governance processes, we expect to expand our supply chain assessment year on year. We expect that our continuous improvement approach will enable Simpro Group to embed effective measures responsive to risks.

We have set out below the key performance indicators (KPI's) we will use to measure the quantitative impacts of our actions, commencing with the FY23 reporting period:

- Number of suppliers issued a modern slavery questionnaire as part of our supplier due diligence process
- Number of suppliers that received our Code
- Number of suppliers that agree to our Code
- Target completion rate for employees completing modern slavery training
- The proportion or number of complaints resolved by a grievance mechanism in relation to modern slavery risks



As well as assessing against its KPI's, Simpro Group set the following goals during the FY23 reporting period to be actioned:

- Expanding our scope of supplier due diligence
- Delivering modern slavery training to wider segments of employees
- Continue to update standard contract terms to include obligations regarding modern slavery. This will apply to new contracts and existing contracts that are up for renewal
- Further assessing and adjusting our KPI's to monitor, measure and improve the effectiveness of our actions

## Process of consultation

The process of consultation in preparing this Statement, as between the reporting entities, involved consultation with the Senior Management of each entity and consideration of other Simpro Group entities which are controlled by or related to the Reporting Entities. The content of this Statement was tabled for review with the Chief Executive Officer.

## Approval

This is a joint statement, made by The Simpro Group Pty Ltd on behalf of Simpro Software Pty Ltd, AroFlo Innovations Pty Ltd and ClockShark LLC, was approved by the Board of The Simpro Group Pty Ltd on 16 June 2023.

*Jonathan Eastgate*

Jonathan Eastgate  
Director of The Simpro Group Pty Ltd



## Annexure - Reporting criteria

Reporting Criteria	Pages
1 & 2. Identify the reporting entity and describe its structure, operations and supply chains	1-2
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	2-3
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	4
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	5-6
6. Describe the process of consultation with any entities the reporting entity owns or controls	6