



Modern Slavery Statement of Casa Technologies Pty Ltd.

Reporting Period: 1 January 2020 to 31 December 2020

1. Identify the Reporting Entity

Our reporting entity is Casa Technologies Pty Ltd. ("Casa Technologies" and together with our subsidiaries, "we" or "us"), which is a wholly-owned subsidiary of Casa Systems, Inc. ("Casa Systems"), a company incorporated in the U.S. state of Delaware and listed on the NASDAQ stock exchange (Nasdaq: CASA).

2. Describe the Structure, Operations and Supply Chain of the Reporting Entity

Our subsidiaries covered by this Statement include:

- Casa Communications Holdings Pty Ltd.
- NetComm Wireless Pty Ltd.
- NetComm Wireless (NZ) Limited
- NetComm Wireless (UK) Limited
- NetComm Wireless (Germany) GmbH
- NetComm Wireless, Inc.

Of the entities listed above, NetComm Wireless Pty Ltd. operates and controls the majority of supply chains and commercial activities of the group.

2.1. Australian Company Number

632 730 020

2.2. Registered Office and Locations

Level 5, 18-20 Orion Road, Lane Cove West, NSW 2066.

Our subsidiaries have physical offices in Australia, New Zealand and the United Kingdom.

2.3. Primary Role

Casa Technologies is the ultimate Australian holding company for Casa Systems' NetComm subsidiaries. Casa Systems is the sole shareholder of Casa Technologies. Casa Systems offers physical, virtual and cloud-native 5G infrastructure and customer premise networking equipment for public and private high-speed data and multi-service communications networks. Casa Systems' core and edge infrastructure technology enables communications service providers and enterprises to cost-effectively and dynamically increase data network speed, add bandwidth capacity and new services, reduce network complexity, and reduce operating and capital expenditures.

2.4. Employees and Representatives

During the Reporting Period, we employed staff in Australia, New Zealand, the United Kingdom, the United States of America, Canada, China and Hong Kong.

2.5. Countries of Operation

- Australia
- New Zealand
- United Kingdom
- United States of America
- Canada
- China
- Hong Kong

2.6. Our Stakeholders

Our stakeholders include, but are not limited to:

- Shareholders
- Customers
- Employees
- Contractors
- Local communities

2.7. Types of Supply Chains

Our supply chains include suppliers and specialists within Australia and certain foreign jurisdictions, with our contract manufacturing partners being predominantly based in China and Southeast Asia. Our contract manufacturing partners manufacture, assemble, test, and package products according to our design specifications. We also utilise original equipment manufacturers ("OEMs") for the supply of certain products.

2.8. Control of Supply Chains

We have formal supply agreements in place with tier 1 suppliers. These supply agreements are audited yearly and also include quality management plans ("QMPs") based on IPC 610D Class II workmanship standards and ISO 9001 quality guidelines, outbound quality assurance ("OQA") standards and acceptable quality limits ("AQLs").

Material suppliers must have a comprehensive, documented quality assurance system. This system must describe the supplier's policies, processes and procedures that relate to all relevant quality elements of design, manufacturing, assembly, testing, and shipment of products, components, materials and assemblies. We may audit the system on agreed intervals.

Regarding quality of downstream component/sub-assembly suppliers, where reasonably possible the material subcontractor will provide evidence of electronic component adherence to published specifications for the components used in the product. For complex or specialised components that require specialised equipment to measure their adherence to their specification, such tests will require external testing at either the sub-tier supplier, third-party labs or by us. Suppliers must not use counterfeit components. Further, suppliers must always source components from reliable sub-tier suppliers that are authorised distributors of a component manufacturer or from the manufacturer directly.

2.9. Disclosures

None

2.10. Major Suppliers

Our major suppliers provide services that are listed in *Table 1. Supply Services by Source Country* below. These suppliers provide long-term and stable supply to enable us to achieve our objectives.

Table 1. Supply Services by Source Country

Major source required	Source country (where known)
Product manufacturing	China and Southeast Asia
Travel	Australia
Office supplies (e.g. cleaning, office furniture, etc.)	Australian supplier with likely international supply chains
Corporate clothing	Australian supplier with likely international supply chains
IT equipment	Australian suppliers with international supply chains

3. Describe the Risks of Modern Slavery Practices in the Operations and Supply Chains of the Reporting Entity and Its Subsidiaries

The risks of modern slavery practices in our operations and supply chains are described in *Table 2. Risks and Controls* below.

Table 2. Risks and Controls

Categories	Risks (describe the risks of modern slavery practices)	Controls (actions taken by us to control or address risks)
Our direct operations	Potential for modern slavery practices within recruitment and employment processes including the use of contract labour	Our employment contracts are assessed against the Fair Work Act 2009; we have a dispute resolution process for all staff
Travel Services	Travel service providers could use unknown labour hiring services	Direct travel arrangements are made through a reputable Australian-based commercial travel agency; an audit has been conducted on this supplier and they have been evaluated as per the requirements of the Act
Product Manufacturing	Manufacturers within our supply chain may use indentured labour, servitude or debt bondage	We have contractual controls in place and conduct regular audits and reviews on major contracts
	Suppliers may purchase "conflict" minerals	We have developed a Conflict Minerals Policy that commits us to complying with the obligations required under Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act (" <u>Dodd-Frank</u> ")

Provision of IT equipment and supplies	The original manufacture of IT equipment may use indentured labour, or labour which is unable to freely leave their position, or are in debt bondage	The manufacturing industry for computer components has a history of indentured labour and servitude; we have little control over the risk presented; we are committed to complying with Dodd-Frank
Provision of office services and supplies such as cleaning and stationery	Suppliers of cleaning services may contribute to modern slavery practices through their recruitment practices	Our primary supplier has committed to corporate responsibility, which includes being socially responsible and in compliance with Australian legislation and fundamental employee rights

4. Describe the Actions Taken by the Reporting Entity and Any Entities It Owns or Controls to Assess and Address These Risks, Including Due Diligence and Remediation Processes

The focus of preparing this Statement was to gain an understanding of potential modern slavery risks within our operations and supply chain. We have audited our tier 1 suppliers to review their existing policies and statements in relation to the Act, raise awareness with these suppliers of the existence of the Act, and invite them to make their own statement.

We conducted on-site inspections of our suppliers annually until the onset of the Covid-19 pandemic when international travel was significantly curtailed. All audits were conducted remotely or by email questionnaires. The principles of the Act have been incorporated into our audit process guidelines. We intend to resume on-site audits as international borders re-open and risks to ensure the safety and wellbeing of audit participants are brought under control.

Our tier 1 suppliers are required to provide certificates of conformity and/or origin for all sourced components to provide better transparency at a deeper level of granularity within our suppliers' supply chains.

These practices have been identified in *Table 2. Risks and Controls* above.

5. Describe How the Reporting Entity Assesses the Effectiveness of Actions Being Taken to Assess and Address Modern Slavery Risks

We have implemented the following steps:

1. We assess the number of suppliers that have completed a risk assessment. Where possible, we conduct audits on-site (during the COVID-19 pandemic, we performed remote audits and used email questionnaires).
2. We review audit results for compliance.
3. Where higher risks are identified in an approach to market, we will implement the steps outlined in Section 9 (Future Actions) below to assess the effectiveness of our actions and controls.
4. We undertake a qualitative assessment of the impacts of these treatments.

5. We will include statistics on compliance with these requirements in our future Modern Slavery Statements.

We will continue to assess potential impacts of modern slavery on our business and identify areas of concern.

6. Describe How the Reporting Entity Consulted on Its Statement with Any Entities It Owns or Controls

We manage our supply chain, including all financial controls, from our Sydney office.

7. Provide Information That You Think Is Relevant

We have incorporated our modern slavery risk exposure into the risk assessment outlined below. This risk assessment now forms part of our ISO9001:2018 Quality Systems and will be audited annually by external auditors.

8. Risk Assessment

8.1. Risks of Modern Slavery Practices

There is no known risk of our supply chain that meets the threshold for serious exploitation as defined by the Act.

8.2. Controls

We have a range of contractual and other controls to reduce the risks of modern slavery in our operations and supply chain. These controls include:

- **Audit Requirements:** Use of contractual terms and conditions that require mandatory participation of audits, etc.
- **Supplier On-boarding Controls:** Update of supplier on-boarding checklists to ensure implementation of modern slavery controls prior to a third party being admitted as a supplier into our supply chain.
- **Reporting:** Encouraging all stakeholders, suppliers and employees to report any concerns with respect to compliance with this Statement. We maintain various channels by which reports can be made without fear of intimidation or retribution. For example, an employee may elect to raise a concern anonymously as reportable conduct under our Whistleblower Policy through KPMG FairCall (<https://www.kpmgfaircall.kpmg.com.au/Netcomm>).
- **Monitoring:** Monitoring of supplier performance against regular modern slavery assessments.
- **Training:** Creation of modern slavery training for employees directly involved in the supply chain function.

9. Future Actions

9.1. Supplier Selection

We have incorporated a risk screening process in procurement activities to improve identification of potential modern slavery risks and identify potential high-risk procurements. Our supplier selection checklist that is completed prior to the onboarding of a new supplier has been updated to incorporate screening for modern slavery risks.

Our modern slavery risks process is as follows:

Step 1

Identify the broad operations and overall supply chain structure of a supply chain candidate through a mapping exercise to identify:

- the candidate’s sector and industry;
- the products and/or services to be procured;
- the geographic region where the material production inputs (e.g., labour) are typically located for the sector or industry; and
- the type of legal entity offering the products and/or services to be procured.

Step 2

Use the matrix below to help identify modern slavery risks across the categories of:

- sector and industry risks;
- product and services risks;
- geographic risks; and
- entity risks.

Table 3. Risk matrix

Sector and industry risks	Product and services risks
<p>Consider whether there is a high prevalence of modern slavery in the industry or sector. Certain sectors and industries may have high modern slavery risks because of their characteristics, products or processes. Typically, if the sector or industry under review is informal and unregulated, with little visibility over lower-tier suppliers, it will be considered a high risk. Further, industries or sectors that involve seasonal, low-paying, low-skilled, or dangerous/hazardous work may also carry a higher risk. For example, industries that are recognised as being high risk globally include extractives, textiles and fashion, fishing, electronics, cleaning and agriculture.</p>	<p>Consider whether there is a high prevalence of modern slavery associated with the good or service. Certain products and services may have high modern slavery risks because of the way they are produced, provided or used. For example, bricks, cobalt, cotton and rubber are recognised as high-risk products globally. Similarly, services such as cleaning that involve lower wages and manual labour may have high modern slavery risks. The Global slavery index provides a list of the top 15 products imported by G20 countries that have a high risk of modern slavery.</p>
Geographic risks	Supply chain model risks
<p>Consider whether there is a high prevalence of modern slavery in the location from which the product or service is sourced or produced. Some countries may have higher risks of modern slavery due to poor governance, weak rule of law, conflict, corruption,</p>	<p>Consider whether the nature of the supply chain model likely to be involved carries a greater risk of modern slavery. Generally, the larger and more complex the supply chain is, the harder it can be for a supplier to identify and monitor</p>

Sector and industry risks	Product and services risks
displacement, state failure to protect human rights, migration flows and socio-economic factors like poverty or widespread discrimination. The Global Slavery Index and the Freedom House List provide information on higher-risk countries.	modern slavery practices. Sub-contracting and the use of labour recruiters in the supply chain will also increase the risks of modern slavery, especially where recruitment fees are charged.

Where risks are identified, further investigation will be undertaken in conjunction with our quality management and/or supply chain teams.

9.2. Approaching the Market

Where significant modern slavery risks are identified in our supplier selection process, additional safeguards will be integrated into tender processes and documentation.

a. Planning Stage

Significant risks will be mitigated as far as possible through the procurement process:

- where a tender request is issued, compliance with the *Act* is a mandatory requirement for participation; and
- the criteria for supplier selection is modified to include compliance with employment standards (e.g., the International Labour Organisation's Labour Standards).

b. Evaluating Submissions

The supplier selection process will include an assessment of:

- non-compliance of modern slavery risk factors to subject the candidate supplier to enhanced due diligence and/or exclusion from the tender process;
- evaluation of compliance with contractual terms and any specifications (as applicable) relating to modern slavery compliance, having regard to the evaluation criteria, and
- whether the prices offered are abnormally low where an established market price is known.

c. Contract Negotiation

Procurement staff will consider including specific clauses that guard against modern slavery risks in our supply contracts. Supplier checklists have been updated with modern slavery criteria that are assessed prior to onboarding any new supplier.

d. Contract Management

Our supply chain management team will work in collaboration with suppliers to incorporate measures safeguarding against potential modern slavery risks, monitor progress and implement action plans to mitigate the risks identified.

We will assess any requirement for drafting new clauses for approaches to market and contract documentation to ensure our supplier's obligations with respect to modern slavery are captured. We will consider the inclusion of key performance indicators in high-risk contracts on a case-by-case basis.

Where appropriate, we will also work collaboratively with our suppliers to raise awareness of modern slavery risks in their operations and supply chains. We will clearly communicate our expectations to suppliers including how to identify, address and report modern slavery issues.

9.3. Due Diligence

Where we identify a risk of modern slavery, we will continue to provide education to our employees on any potential risks/impacts and possible controls. This may include additional due diligence on suppliers in question.

We will continue to monitor modern slavery issues and their potential impact and consider the possible inclusion of relevant clauses in our supplier contracts as appropriate.

For the purposes of complying with the Act, this statement constitutes the requisite annual "Modern Slavery Statement" for the financial year ending 31 December 2020. This Statement has been approved by our Board.

Casa Technologies Pty Ltd



Steve Collins
Senior Vice President