



# SoftLabs Modern Slavery Statement

For the Reporting Period: 01 July 2023 to 30 June 2024

This Joint statement is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) on behalf of:

- **SoftLabs Pty Ltd**
- **SoftLabs ANZ Pty Ltd**

for 2023-2024 financial year to prevent slavery and human trafficking in any of our supply chains and in any part of our own business.

## Introduction :

SoftLabs is an Australian enterprise software company, being **ISO 9001 : 2015, 27001 : 2022 & 45001 : 2018 Certified**, we are committed to serve business and IT companies globally nurture their vision to ensure that quality systems meeting client expectations are delivered on time, supported by a passionate team of industry professionals, with functional expertise and the highest standards of governance, integrity and renowned technology practices, with a global delivery model.

## 1. Structure :

**SoftLabs Pty Ltd** is an Australian enterprise software company specialised in providing technology consulting, project management, software development and assured services (Testing, Cyber Security, Support). SoftLabs provides consultants for specialist IT services to its clients across Australia and New Zealand. Our procurement and human resources functions are largely centralised at our Sydney headquarters, which provides visibility over the majority of our supply chain and workforce.

**SoftLabs ANZ Pty Ltd** is an ANZ company, an arm of SoftLabs Pty Ltd in providing Industry Automation Solutions, ERP Implementation services having full time consultants (Project based).

## 2. Operations:

In Australia, both SoftLabs Pty Ltd and SoftLabs ANZ Pty Ltd operate under the same policies and procedures, having the same senior leadership team and share many of the clients. The process of consultation between SoftLabs Pty Ltd and SoftLabs ANZ Pty Ltd (for the purpose of drafting, reviewing and submitting a joint statement) was to hold a meeting between the Directors and the Board for both SoftLabs Pty Ltd and SoftLabs ANZ Pty Ltd Support Team to discuss SoftLabs policies and procedures in relation to modern slavery and consult on the drafting, reviewing and submitting of a joint modern slavery statement (for SoftLabs Pty Ltd and SoftLabs ANZ Pty Ltd).

This Joint Statement is a single, consolidated description of the actions of both SoftLabs Pty Ltd and SoftLabs ANZ Pty Ltd to address modern slavery, and it has been approved by the Directors of SoftLabs Pty Ltd and SoftLabs ANZ Pty Ltd and by the Board.

Structure	Operations	Supply Chains
<b>SoftLabs Pty Ltd (ACN 158 617 577)</b> is a privately owned company.	This entity owns or controls all of its supply chains for technology consulting, project management, software development and assured services (Testing, Cyber Security, Support).  Our supply chain mostly consists of Independent Consultants working in the IT sector for SME's, private, public and government organisations. Defining our Service Delivery strategy, i.e. customer accounts within regions, we are present	Australia

	in New South Wales, Victoria, Queensland, South Australia, Western Australia and Australian Capital Territory.	
<b>SoftLabs ANZ Pty Ltd (ACN 065 969404)</b> is privately owned company ( An arm of SoftLabs Pty Ltd)	This entity owns & control by SoftLabs Pty Ltd for all its supply chains in providing industry Automation Solutions, ERP Implementation to all of its clients.  This supply chains contains ERP delivery specialists and support specialists in providing ERP solutions.	Australia and New Zealand
<b>Operating Location:</b>  <b>SoftLabs Pty Ltd &amp; SoftLabs ANZ Pty Ltd</b>  Suite 20, 330 Wattle Street, Ultimo NSW 2007.	SoftLabs recognises that all businesses have an obligation to prevent slavery, slavery-like practices and human trafficking and will do all in its respective power to prevent slavery, slavery-like practices and human trafficking within its business and within the supply chains through which it operates from our NSW office.	

SoftLabs does not tolerate slavery, human trafficking, forced or child labour or child exploitation of any kind. SoftLabs is committed to respecting human rights and fair labour practices and working with its suppliers and clients to eradicate forced labour in Australia & New Zealand.

SoftLabs recognises the responsibilities it has within the supply chain to provide skilled labour to its clients and to ensure that all the workers it engages directly are treated fairly, ethically and in compliance with legislative requirements. SoftLabs policies, procedures and practices are designed to protect human rights throughout the recruitment, selection and placement cycle and throughout all assignments and projects it performs for its clients. SoftLabs also takes steps to ensure that its suppliers provides services also meet the same high standards.

### 3. SoftLabs Policies and Procedures relation to slavery and human trafficking :

SoftLabs has in place the following policies and procedures in identifying and managing human rights, promoting diversity and ensuring compliance with legislation:

- Employee / Contractor Pre Joining Checklist v 4.0
- Occupational Health & Safety Management System v 1.0
- Employee / Contractor Code of Conduct v 3.2
- Employee / Contractor confidentiality agreement
- Environment, Health and Safety Policy v 4.0
- Working from Home Checklist
- Labour Hire Standard Policy
- Supplier Code of Conduct & Agreement

SoftLabs is committed in upholding and endorsing human rights due diligence obligations within our own business operations and throughout our supply chain. This policy statement applies to all board members, managers and, all other employees / consultants within SoftLabs.

SoftLabs sets out our overarching commitment to human rights and defines the requirements for our entities.

These checklists describe the steps we take to identify and eliminate WHS risks and promote workplace safety. SoftLabs also requires its clients to provide a safe workplace for our workers and requires workers themselves to work safely and consider the health and safety of those around them.

For SoftLabs employees and consultants our labour hire standards policy sets out our commitment to Australia social and labour standards. The policy specifically states that SoftLabs does not accept any form of forced or compulsory labour, child labour, modern slavery or human trafficking in any of our operations or facilities. It prohibits practices such as confiscating or withholding worker identity documents and notes our commitment to ethical recruitment.

Our expectations towards clients are covered in our client service agreements. We expect our clients to uphold human rights, adhere to the legislative principles on business and human rights, and carry out human rights due diligence. No forms of slavery, practices akin to slavery, serfdom, or other forms of domination or oppression in the workplace, such as extreme economic exploitation and humiliation, shall be tolerated.

### **3.1. Cultural Effectiveness and High Performing Conduct**

SoftLabs Code of Conduct which outlines the requirement for our staff to act ethically and responsibly in all the work they do for our entities. Employees / Consultants are required to ensure compliance with industry best practice, agreements and applicable legislation, including following/enforcing WHS procedures & policies, privacy, and avoiding/preventing discrimination, harassment, bullying, bribery & corruption and modern slavery in our business and in our supply chain.

### **3.2. Client Contractor Agreement**

SoftLabs contractor engagement agreement is an agreement including agreement on reasonable hours to be worked, prompt payment of wages, and other obligations. This Agreement was created in alignment with Fair Work Australia guidelines.

### **3.3. Confidentiality Agreement**

SoftLabs confidentiality agreement is an agreement which covers confidentiality, employees / consultants suitability and express communication of employees / contractors working needs and requirements, ensuring payment for time worked and other reasonable payment for work, and other obligations by aligning with Fair Work Australia guidelines.

### **3.4. Addressing modern slavery risks – policies and due diligence processes**

SoftLabs is committed to addressing modern slavery risks in our own operations and in our supply chain. We have clear and well-defined policies, guidelines, and standards in place. These are regularly audited ( every half yearly as part of our ISO audit in alignment with our Quality Management System i.e ISO standards) to ensure alignment with our human rights commitments, including modern slavery, and are binding on all SoftLabs employees / consultants.

### **3.5. Approach to managing modern slavery risks**

Our policies and procedures are communicated to the relevant parties (including clients) and are understood and complied with, we ensure that:

- We do not charge any fees to individuals to allow them to register with us, join our database, gain access to job opportunities or apply for our jobs.

- Our employees / consultants are provided with clear and comprehensive written terms and conditions including in relation to rates of pay/fees, hours and location of work, duties and responsibilities and client requirements, as applicable.
- The employment contracts comply with all applicable employment related legislation and they are given the opportunity to discuss and negotiate terms.
- There is no pressure on those individuals to apply for or accept work and they can terminate their engagement (in accordance with the contract terms) at any time.
- If an individual has the appropriate work rights to live and work in Australia/NZ, as required. We ask to see relevant documents to onboard them as employees or consultants.
- All our legal obligations are complied with in the recruitment and on-boarding process (including WHS requirements).
- Our quality management systems and procedures (including for generating and approving new contracts and giving workers access to timesheets etc) have controls in place that aim to prevent placements from occurring without the appropriate checks having been performed (including work rights checks, police checks where required, labour hire licence checks, obtaining privacy consents, confirming WHS training and inductions have taken place, obtaining banking and superannuation instructions, returning signed contracts etc). Systems are in place to note expiring visas/licences and to follow up on missing documentation.

#### **4. Training and capability building**

SoftLabs continue with the integration of human rights related aspects, including modern slavery, into existing training and awareness raising formats for relevant internal functions. As part of the new employee / consultant induction programmes our quality process team will provide training on how to meet the requirements of Australia and New Zealand social and labour standards policy in their area of responsibility.

We consistently broaden our internal communication channels to further solidify our dedication to human rights throughout the group. This includes heightening awareness of human rights and modern slavery.

#### **5. Grievance and Complaints Procedure**

All the grievances and complaints are directed to [hr@softlabs.com.au](mailto:hr@softlabs.com.au) by all of our employees. We support our clients for technical issues through [support@softlabs.com.au](mailto:support@softlabs.com.au) . We have 24/7 team who will be monitoring into the grievances and route to specific departments in addressing the same .

Our grievance and complaints procedure provides guidance and protections to SoftLabs personnel to enable them to report suspected unlawful/unethical behaviour to SoftLabs management to ensure legal and ethical standards are maintained and also those are addressed appropriately.

#### **6. Key indicators & supplier review of modern slavery risks**

To gauge the effectiveness of our modern slavery approach, and under the guidance and supervision of the Board, SoftLabs is supported by a dedicated support team who are responsible for risk and compliance. This team helps oversee compliance of our employees, contractor staff, clients and extended supply chains. The support team, along with its adherence to internal policies and practices undergoes ongoing scheduled and ‘as required’ checks and reviews throughout the year as well as input from our legal and compliance specialists.

Upon entering into new contracts with new clients or reviewing/updating contractual arrangements with existing clients, agreements are reviewed and (where appropriate) relevant provisions are inserted regarding modern slavery. These are conducted by the SoftLabs support team with a focus on compliance in the following areas:

- Ensuring lawful/proper recruitment practices
- Avoiding forced /child labour
- Ensuring fair wages & conditions
- Allowing for workers to terminate their employment/engagement

Sometimes our clients stakeholders may be required to provide further information and/or participate in an audit and, if required, suppliers will be required to cooperate with SoftLabs in taking action to mitigate/remove any identified risks of modern slavery.

## 7. Assessing the effectiveness of our actions

Assessing the effectiveness of our approach to preventing modern slavery helps us understand and continually improve how we identify, prevent, and mitigate relevant risks. It also helps us assess the effectiveness of our grievance and remediation processes if we identify that we have caused or contributed to modern slavery-related impacts.

SoftLabs have conducted several initiatives to assess and address our modern slavery risks. This includes a comprehensive due diligence process to assess the risk that modern slavery exists in our operations or supply chain. As part of our commitment to identify and eradicate slavery and human trafficking and to continuously assess and address modern slavery risks, we have in place a process to undertake due diligence on our supply chain to ensure compliance with legislative obligations, and such compliance forms part of our contractual relationship with suppliers and partners.

As part of approach for assessing and addressing modern slavery risks, we perform :

- Providing awareness of modern slavery through engagement
- Communicating our expectations through clear open discussion and agreements
- Recognising and responding to the potential for inappropriate practices through questioning
- Providing timely and accurate information on supply practices, and any actions being undertaken to mitigate modern slavery risks.

In order to assess the ongoing effectiveness of the actions described above, our quality process team will work together to review the policies and processes as part of our ISO audit which is already in place to consider whether we are appropriately identifying and evaluating our modern slavery risks. To the extent that potential improvements to our policies are identified, appropriate updates will be made.

Below measures are taken to monitor the effectiveness of the actions taken to mitigate the modern slavery risks in our operations and supply chains :

- Incorporating specific terms and conditions in our material supply contracts obliging our clients to commit to mitigating the risk of modern slavery
- Providing training to all employees to ensure they are aware of how to recognise modern slavery risks and understand the process for reporting suspicious behaviour
- Implement procedures for taking appropriate action where modern slavery is suspected or identified
- Refining our policies and procedures to ensure all suspected or identified incidents are escalated on a timely basis.
- SoftLabs achieved and maintained Quality Management System certification under ISO 9001:2015 (Quality Management System), ISO 27001:2022 (Information Security Management System) ISO 45001:2018(Occupational Health & Safety Management System) in relation to Providing Digital Solutions Specialised in Industry Automation Solutions, ERP Implementation, Technology Consulting, Project Management, Software Development and assured Services (Testing, Cyber Security, Support).

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## 8. Approval - MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

### Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of SoftLabs as defined by the Modern Slavery Act 2018 (Cth)1 (“the Act”) on 31-Jul-24 on behalf of the Board of Directors.

### Signature of Responsible Member

This modern slavery statement is signed by a responsible member of SoftLabs as defined by the Act2:

1.This Joint Statement is approved by **SoftLabs Pty Ltd**:

*Lakshmi*

Signature of Lakshmi Pillamarri, Founding Director, on behalf of the Board of Directors

2.This Joint Statement is approved by **SoftLabs ANZ Pty Ltd**:

*Lakshmi*

Signature of Lakshmi Pillamarri, Founding Director, on behalf of the Board of Directors

### Appendix I – Reporting Entities

This Statement is made on behalf of the following SoftLabs Pty Ltd and SoftLabs ANZ Pty Ltd legal reporting Entities

Entities
SoftLabs Pty Ltd
SoftLabs ANZ Pty Ltd

### Appendix II – How our Statement Addresses the Australian and New Zealand MSA Mandatory Reporting Criteria

Australian MSA mandatory reporting criteria	New Zealand MSA mandatory reporting criteria	Reference in this Statement
Identify the reporting entity.	NA	Appendix 1
Describe the reporting entity's structure, operations and supply chains.	Organisation's structure, its business, and its supply chains.	Section 1
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	Sections 3 and 7
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.	<ul style="list-style-type: none"> <li>• Organisation's policies in relation to slavery and human trafficking</li> <li>• its due diligence processes in relation to slavery and human trafficking in its business and supply chains</li> <li>• the training about slavery and human trafficking available to its staff.</li> </ul>	Sections 3 and 7
Describe how the reporting entity assesses the effectiveness of these actions.	Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Section 7
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	NA	Section 2



<b>Any other information that the reporting entity, or the entity giving the statement, considers relevant.**</b>	NA	NA
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