

This Statement revised 19 August 2021 to correct one (1) typographical error on page 3, changing a "i" to "o"



Cyber Security + Customer Experience

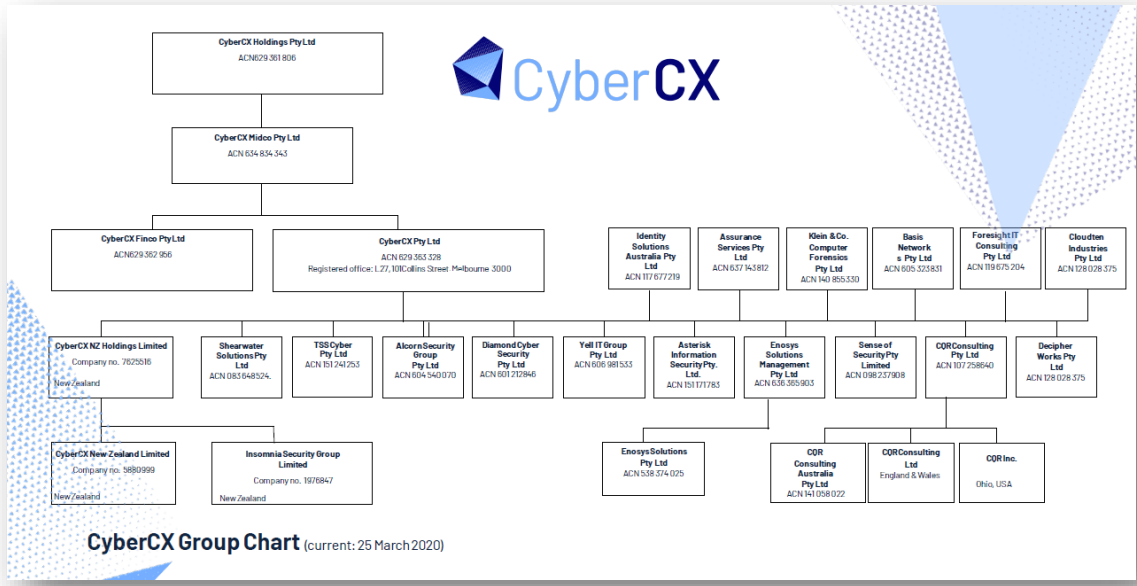
MODERN SLAVERY STATEMENT

1 July 2019 – 30 June 2020

1. CONFIRMATION OF REPORTING ENTITY

This Modern Slavery Statement is made by CyberCX Holdings Pty Ltd (**CyberCX**) (ABN 90 629 361 806) and is the first statement to be made in compliance with the Modern Slavery Act 2018 (Cth) (the **Act**) by the CyberCX organisation.

Headquartered in Melbourne, Australia, the CyberCX group consists of over 20 wholly owned, related bodies corporate across Australia, New Zealand, the United Kingdom and the United States, however a none of these related companies is a reporting entity under the Act, this is not a joint statement.



This statement has been prepared in respect to the financial year ending 30 June 2020 and also takes into account the actions and activity that has been undertaken to 26 March 2021.

As a good corporate citizen, CyberCX is dedicated to operating in an ethical and legally compliant manner under the Act, and we expect our suppliers to share these values. We seek to minimise the risk of modern slavery occurring in our operations and supply chains.

The purpose of this statement is to outline CyberCX's approach to ensuring our business and supply chains are conducted within a framework that mitigates modern slavery risk. CyberCX is committed to continuous improvement and taking proactive steps to ensure that modern slavery does not occur in our own business and supply chains.

2. CYBERCX'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Organisational Structure

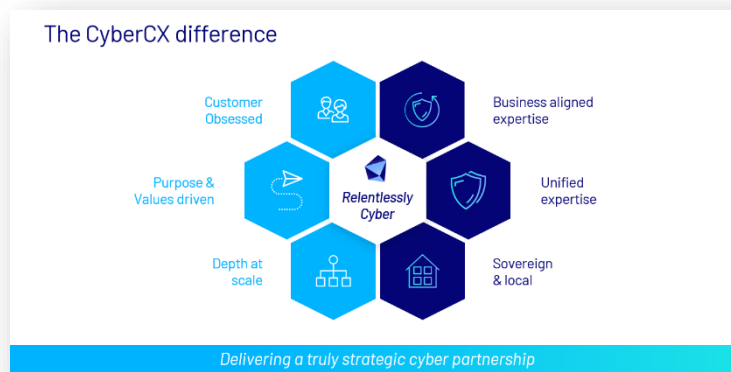
CyberCX aims to be Australia and New Zealand's leading, independent cyber security services organisation.

Our purpose is to help private and public sector organisations of all sizes optimize their cyber security and cyber-risk awareness in an increasingly complex and challenging threat environment. We strive to make the online environment safe and to secure and support the communities in which we live.

CyberCX. The greatest force of cyber security experts in Australia and New Zealand.

This purpose is described on our website and embedded in our employee code of conduct and numerous other business policy documents. Consistent with this purpose, we are committed to preventing slavery and human trafficking in our operations and supply chains.

Launched in October 2019, CyberCX brings together 18 specialist cyber security services organisation, unifying the most trusted brands in the industry, and the leading cyber security experts from across Australia and New Zealand (and a small number of UK and US staff) who built them.

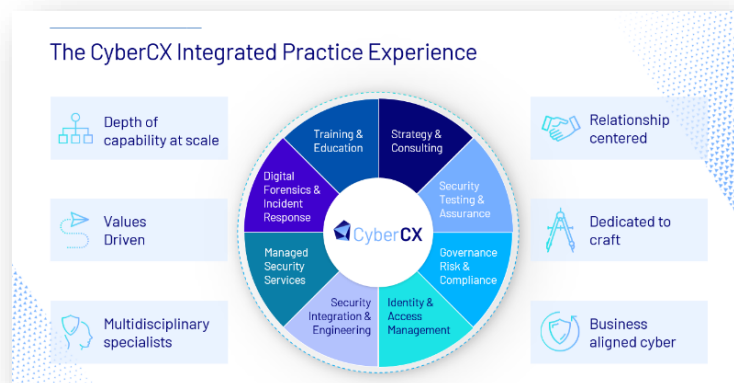


Operations

CyberCX is principally involved in the delivery of critical, complex cyber security consulting services to government and business customers. We employ more than 700 professionals located in over 20 offices across Australia, New Zealand, the United Kingdom, and with employee reach into the United States. We are one team on a single mission, and we're customer obsessed. While Australia and New Zealand is our foundation, the world is our aspiration. CyberCX is committed to delivering world class cyber security services and building our presence across the globe. CyberCX is proud to have teams located in Europe and the United States, with a commitment to further investment to expand our reach and impact. We're well placed to take a leadership role in the Asia-Pacific region.

CyberCX provides cyber security services across 8 key 'practices' in the areas of:

- Strategy & Consulting
- Security Testing & Assurance
- Governance, Risk & Compliance
- Security Integration & Engineering
- Identity & Access Management
- Digital Forensics & Incident Response
- Education & Training
- Managed Security Services



Key supply chains areas

CyberCX's supply chain consists of goods and services that support our cyber security consultancy services across Australia, New Zealand, the United Kingdom and the United States.

As a professional services focused organisation that pre-dominantly undertakes desk-based professional IT-based services for customers within Australia and New Zealand, CyberCX has a limited supply chain when assessing modern slavery risks and our greatest expenditure is in remuneration of our team members.

Thereafter our supply chain is predominantly related to expenditure that provides the infrastructure, facilities and other support required to enable the delivery of our services in the following key categories:

- Technology and hardware
- Premises and facilities
- Professional services
- Staff costs (which includes staff merchandise and apparel)
- Travel and expenses

The majority of goods and services by value that we procure come from suppliers based in Australia.

However CyberCX acknowledges that some of our suppliers source goods or services from overseas, including some jurisdictions that present a higher risk of modern slavery according to the Global Modern Slavery Index¹. These include:

- IT hardware (including laptops (and related devices such as keyboard mice and docking stations) and other IT infrastructure (servers, routers)) which is produced in China and Malaysia.
- CyberCX merchandise that is procured for suppliers that source goods from China.

CyberCX has over 1,100 suppliers that form part of the operational supply chain, however less than 100 have an annual expenditure by CyberCX of more than \$100,000.

¹ Global Slavery Index 2018 <https://www.globallslaveryindex.org/>

3. OUTLINING THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

CyberCX is required to identify the ‘risks of modern slavery practices’ in its supply chain, meaning the potential for CyberCX to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.

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

Operations

As a primarily high-skilled, professional services organisation operating with over 95% of staff in trans-Tasman locations, CyberCX’s operations are generally considered to be low risk for modern slavery.

CyberCX carries on business in Australia, New Zealand, the United Kingdom and the United States. It has no operations, joint ventures or partnerships in countries reported to have a high prevalence of modern slavery practices by the Global Slavery Index.






Additionally, our 700+ employee workforce is subject to the requirements of the relevant local labour laws and regulations, including the Australian Fair Work Act 2009 (Cth), the New Zealand Employment Relations Act 2000, the United Kingdom’s National Minimum Wage Act 1998 and Employment Rights Act 1996, and the federal and state laws in the United States, along with the various workplace health and safety regimes in the jurisdictions in which we operate.

Accordingly, as the key operational functions of CyberCX involve the employment or engagement of staff in our offices in Australia, New Zealand, the United Kingdom and the United States to deliver cyber security services, CyberCX has assessed the risk of modern slavery in its operations as relatively low.



Supply Chain

CyberCX's supply chains consist of goods and services which support our corporate operational departments and client facing services lines. We operate in a sector that is generally considered a low risk for modern slavery; however, we recognise we can be indirectly exposed to modern slavery risks through our supply chains. Excluding remuneration, our major categories of procurement are:

| AREA | EXPOSURE TO MODERN SLAVERY RISKS |
|--|--|
|  <p>Technology and hardware <i>Data storage, hardware and software supply, including resale to customers</i></p> | <p>Electronics is recognised as a high-risk industry globally. We procure from leading Tier 1 globally recognised suppliers who have mature measures to reduce modern slavery risks in their supply chains, including independent auditing and public reporting of key measures and KPIs. Our initial review of these providers gives us comfort they are taking adequate steps to identify and manage modern slavery risks.</p> |
|  <p>Premises and Facilities <i>Rental, cleaning, energy and related</i></p> | <p>Cleaning services are recognised as high-risk services globally. CyberCX uses the cleaning services provided by the building management (usually large, superannuation-backed infrastructure managers with mature reporting arrangements) at each of our office sites. Further due diligence of this category of our supply chain to occur in FY2022.</p> |
|  <p>Professional Services <i>Insurance, audit, legal, accounting and taxation services</i></p> | <p>Not considered high risk services. Sourced predominately from Australia and New Zealand.</p> |
|  <p>Staff items <i>Staff apparel and merchandise</i></p> | <p>Textiles is considered a high-risk industry globally. We procure staff apparel and merchandise from a number of local suppliers, some of which is made in China, recognised as a country that may present a higher risk of modern slavery practices. A focus in FY2022 will be to more closely assess this area of our supply chain.</p> |
|  <p>Travel and expenses</p> | <p>Not considered high risk services given that nearly all travel occurs within Australia, New Zealand and the United Kingdom.</p> |

4. OUR ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

Governance controls and training

Over the course of 2020 and early 2021, CyberCX has actively put in place corporate governance policies which guide all CyberCX team members to promote a culture of compliance, ethical behaviour and honesty.

The most relevant policies and procedures we have in place that mitigate against the risk of modern slavery in our operations and supply chain are:

- **CyberCX Code of Conduct:** provides guidance to team members in their roles in upholding CyberCX's core values, adhering to ethical principles, and demonstrating due care when dealing with CyberCX's colleagues, customers, and other parties such as vendors, strategic partners, or regulators.
- **Whistleblower Policy:** provides CyberCX team members with a framework to encourage the identification of misconduct and harm (including modern slavery issues) to our customers and the CyberCX community, to encourage disclosures of wrongdoing, and to ensure that individuals who disclose wrongdoing can do so safely, securely, and with confidence that they will be supported and protected. This policy is actively supported by our independent, third-party whistleblower reporting service, provided by Your Call, which allows team members to report instances of improper conduct.
- **Environment, Social and Governance (ESG) Policy:** outlines CyberCX's approach to the identification, consideration, and integration of ESG issues in its operating model and business activities. This includes promotion of the elimination of all forms of forced and compulsory labour, the effective abolition of child labour, and the elimination of discrimination in respect of employment and occupation, and protection of international proclaimed human rights.
- **Modern Slavery Policy:** aims to confirm our commitment to contributing to ending all forms of modern slavery and sets out how CyberCX aims to reduce the risk of modern slavery practices within our supply chains and operations. We are aiming to finalise this policy for Board approval in FY2022.
- **Supplier Code of Conduct:** sets out CyberCX's key expectations of its suppliers, including the promotion of internationally recognised labour practices and the reduction of modern slavery practices. We are aiming to finalise this policy for Board approval in FY2022.

The policies are also supported by policies and guidelines around Anti-Discrimination, Bullying, & Harassment, and Anti-Bribery & Corruption, and Recruitment.

Understanding and compliance with these policies has been underpinned by a number of information and training sessions lead by the Legal team, and will be further enhanced by our SaaS-based 'learning management system' which has been operational from 19 March 2021 for targeted compliance-based training across CyberCX.

Supplier assessments and contractual mechanisms

Being a relatively new organisation that has brought together a number of smaller and established organisations that did not have modern slavery reporting obligations, CyberCX has recently commenced its work to assess the risks in its supply chain, and work towards mitigation of those risks.

Recognising that our greatest risk of modern slavery is in our supply chains, CyberCX has established and commenced implementing processes to review our risk across current and potential future supply chains. These includes risk screening for all existing and future suppliers in relation to modern slavery compliance.

Once the risk level has been determined for a supplier, CyberCX is committed to undertaking remedial actions as required (which may involve moving to a new supplier that has a more satisfactory approach to modern slavery risks). As part of working towards ISO27001 certification in June 2021, we have commenced implementation of a system-based supplier onboarding process when engaging with new suppliers, which will include a due diligence questionnaire concerning modern slavery practices, as well as ESG risks and other issues. This is due to be rolled out in FY22. It is expected that all new suppliers will be required to demonstrate that they are managing modern slavery risks as part of their overall operations. It is also expected that, over time, we will be able to undertake a level of due diligence across all material vendors in our supply chain, and where necessary conduct annual compliance reviews on suppliers where they are deemed to be higher risk.

CyberCX has also begun to implement specific modern slavery clauses in supplier contracts as able, recognising that many of our largest suppliers by expenditure are global, mature technology providers that are not willing to agree to these clauses, but are able to demonstrate other processes which mitigate modern slavery risks.

Our focus areas for FY 2022

In FY2022, our focus areas for continuous improvement are:

- Continued organisational awareness and engagement on modern slavery requirements, including via face to face and LMS-based training.
- Implementation of CyberCX's Supplier Code of Conduct and Modern Slavery Policy.
- Roll out of our supplier onboarding assessment and questionnaires to assess modern slavery and other risks for new onboarding suppliers.
- Continued implementation of appropriate modern slavery contractual requirements as able.
- Identification of "high risk" suppliers in our supply chain, and an action plan to either work with the supplier to mitigate these risks, or change suppliers to a lower-risk provider.

5. ASSESSMENT OF THE EFFECTIVENESS OF OUR ACTIONS

Given we are a relatively new organisation, our focus in FY21 and until now has been to establish the governance policies and frameworks for ethical business conduct and anti-modern slavery programs.

Now these frameworks are in place, throughout the remainder of FY21 and into FY22 our focus will be working to finalise and deploy our centralised systems and tools to allow easy, organisational-wide identification, management and mitigation of modern slavery risks in our supply chain.

Bringing together the frameworks and policies, with our newly implemented systems and tools, will allow us to be well placed to identify and report against appropriate measures of our effectiveness in future reporting cycles. A key focus throughout FY22 will be our ability to demonstrate further development in key areas including training, system-based due diligence processes, procurement and engagement with our suppliers.

6. OUR CONSULTATION APPROACH

Given all the various wholly-owned subsidiaries in the CyberCX group are integrally connected to CyberCX, with shared management, governance, risk and other corporate functions, we have conducted an internal consultation process across key stakeholders of our executive leadership team, relevant supply chain managers and our Governance, Risk and Compliance team in producing this statement.

7. FURTHER RELEVANT INFORMATION

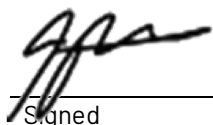
While we have taken meaningful steps in our work so far concerning our modern slavery response, a number of key factors have meant that the time and resources dedicated to our management of this important issue have been focused in other areas:

- The impacts of the unprecedented global pandemic have meant that we, like most business globally, have dedicated time and resources towards dealing with the consequences of COVID-19 on our people and customers.
- As a result of the COVID-19 pandemic, the cyber security industry has seen a substantial increase in the level of threat activity and demand for our services.
- We are bringing together nearly 20 separate and distinct organisations, with their own systems, tools and maturity levels and none of which were a reporting entity under the Act, into a single, integrated operating business. We are now well progressed to having centralised data collection, analysis and reporting capabilities in place which will allow us to better onboard and managed suppliers going forward.

8. APPROVAL

In accordance with Section 13(2) of the Modern Slavery Act, this Statement was approved by the Board of CyberCX Holdings Pty Ltd on 31 March 2021.

The Board is the principal governing body of CyberCX for the purposes of approving this Statement. This Board has authorised John Paitaridis, Chief Executive Officer, to sign this Statement.


Signed

31 March 2021

Date

John Paitaridis
Chief Executive Officer
CyberCX