

Access Workspace Pty Ltd

First Modern Slavery Statement

Financial Year 1 July 2021 to 30 June 2022

About this Statement

This Modern Slavery Statement (**Statement**) is made in accordance with the Modern Slavery Act 2018 (Cth) (**Act**). This Statement is made by Access Workspace Pty Ltd ACN 636 482 383 (**Access Workspace**).

This Statement outlines the steps Access Workspace and its subsidiaries (**Access Australia**) have taken to assess, address, manage and mitigate modern slavery risks in our operations and supply chains during the year ending 30 June 2022. It also demonstrates how we plan to continue to improve our frameworks and processes in the future.

Access Australia is committed to acting ethically and with integrity in all its business dealings, including its operations and supply chains.

At Access, we are committed to doing business the right way, having attained a position in 'The Sunday Times Top 100 Companies to Work For' on a number of occasions. We are absolutely committed to putting in place steps that are aimed at ensuring that our company is free from slavery and human trafficking and that all our employees, as well as the employees, agents and contractors of the companies that work on our behalf, are kept safe.

This Statement is Access Australia's first statement. It covers the period from 1 July 2021 to 30 June 2022. An index has been provided to guide readers to information related to each mandatory reporting criteria under the Act (Attachment 1).

Our Structure, Operations and Supply Chain

Structure and consultation

Access Workspace is the reporting entity for the Access Australia group of companies. The consolidated Access Workspace Group is part of the whole corporate group called The Access Group.

Access Australia represents the Australian sub-group of UK-based Access UK Limited (**Access Group**). Access Workspace is wholly owned by Access UK Limited.

Access Workspace wholly owns the following subsidiaries:

- Access Software Australia Pty Ltd
- Attaché Software Australia Pty Ltd
- Unleashed Software Pty Ltd
- Definitiv Group Pty Ltd
- FastTrack Pty Ltd
- EziTracker Australia Pty Ltd

Access Workspace engaged and consulted with the above companies it owns or controls in the development of this statement. We discussed the requirements of the Act and our expectations around modern slavery. A discussion between the directors of all the entities above were conducted in the development of this Statement.

Access Group has a further network of global subsidiaries, however no corporate entities other than those outlined above have operations in Australia that satisfy the requirements to report under the Act.

The Board of Access UK Limited is responsible for the overall governance and operations of the Access Group, including Access Australia. This includes guiding strategic direction, monitoring risk and overseeing general management activities.

Access Australia uses the same key policies, procedures, and governance processes as Access Group. Access Group has adopted a group-wide approach to modern slavery. Each of the actions, measures and evaluations identified in this statement are taken to apply to the above entities. In this statement, reference to Access Group includes Access Australia.

Operations

Access Group is a leading provider of payroll and other business management software and solutions to small and medium sized organisations globally. Access Australia offers software and services to more than 55,000 customers and 15,480 customers in Australia. We are committed to providing software that makes working lives better and not put barriers in the way to growth. Our innovative software solutions streamline everyday processes, provide efficiencies that result in material productivity gains and give real-time insights that allow organisations to act in an instant knowing they have the data they need at their fingertips, allowing everyone the freedom to do more of what is important.

Since its inception in 1991, the Access Group's global employee base has grown to over 4798 with continued investment in hiring people expected in the financial year 2022. Access Australia has 428 employees.

Supply chain

We work with over 360 suppliers across the APAC region. Our major suppliers are large, multinational companies that are predominately Australia, Singapore, Malaysia and New Zealand. The supply base varies from services provided to the business internally, and services outsourced to support for each of its products across the APAC region.

We work with various types of suppliers and such suppliers include software, facilities and commercial suppliers. These suppliers contribute to Access Workspace's services and products and these services are sourced from both Australian and overseas entities.

Our direct supply chain in Australia comprises mainly long-term relationships servicing The Access Group's business footprint in the region, with majority of the supplier base located in APAC.

The Risks of Modern Slavery Practices

Due to the nature of our business, we believe we have a lower risk of modern slavery occurring in our supply chain compared to businesses in other sectors. We are the first link in our supply chain as we design and build the software we provide to our customers. The majority of our third-party support derives from IT, marketing, real estate, facilities and professional services, which is subject to thorough legal contracts with us.

Notwithstanding, Access Workspace recognises that there may be risks of modern slavery practices present in our outsourced services (e.g. cleaning and facilities management) and also arising from our sourced materials (e.g. IT equipment). Such risks may include use of child labour by suppliers and use of slavery or forced labour in overseas countries in which we source materials.

Access Workspace carries out a modern slavery assessment as part of our supplier on-boarding process and as our major suppliers are large, multi-national companies, we also ask for details of their ethical operating standards through our formal tendering process.

Identifying and addressing these potential risk scenarios is part of our continuous improvement initiative and will be the priority of our supplier engagement activities over the next reporting year.

Assessing and Addressing Potential Risks

Our activities to date to assess and address potential modern slavery risks have included looking at how we engage with new suppliers. We have a Supplier Management Process as part of our ISO27001 certification and have included Modern Slavery as part of that assessment.

We are developing standard processes that encourage existing and new suppliers to comply with applicable anti-slavery and human trafficking legislation, including the Act.

We will also, where appropriate and practical, visit our suppliers' offices, manufacturing and warehousing plants globally. This will help us to become familiar with how they operate and what safeguards they have in place to reduce, remove and prevent the use of slave or forced labour in their organisations and their supply chains.

We are making sure that our employees are aware of the Act, of the definitions of slavery and human trafficking and that they know what to do should they suspect a case of slavery or human trafficking.

Policies and procedures

We have formal policies and procedures in place to promote ethical, open and transparent business conduct for our employees and suppliers. These policies and procedures apply to Access Group as a whole, including Access Australia entities.

Our policies contribute to our commitment to prevent violations of human rights, including modern slavery. These policies include our Code of Conduct, Supplier Code of Conduct and Modern Slavery Policy. These policies govern the expectations all Access Group companies have for their employees and suppliers regarding lawful and ethical conduct.

We will continue to review and update our policies to ensure that they include processes to also help address the risk of modern slavery in our operations and supply chains.

Our governance

We have the following governance structures in place to support Access Group, including Access Australia, to identify, address and mitigate or remedy modern slavery risks in our operations and supply chain:

Governance Body	Responsibilities
Procurement and Legal	The role of the Procurement and Legal Body is to review Access Group's audit function and internal and legal compliance and control systems. This extends to modern slavery risks within the group's operations and supply chains. The Body also reviews the Suppliers Checklist and ensures that the suppliers adhere to modern slavery laws.

Managing suppliers

We ask suppliers to sign up to specific documents, such as our Supplier Declaration and Privacy Policy. We also require that all suppliers agree to abide by appropriate legislation including, minimum wage, modern slavery, anti-bribery, equality and other legislation no less than Access Group entities adhere to themselves.

Our relationships with suppliers are subject to legal contracts and we do not pay cash for services. Our main suppliers have their own standards of ethical of behaviour in place and we ask for details of

these standards via our formal tendering process for those and all other suppliers. As part of our selection of new suppliers, we undertake the following:

- If a supplier is qualified under the Modern Slavery Act 2015 (UK) (**UK Act**) and/or the Act, each supplier to provide us with a copy of their own statement and any future updates, or to warrant that they have a published statement which they make available for review on their corporate website.
- If a supplier is not qualified under the UK Act or the Act, the supplier is requested to provide us on an annual basis with a specific statement that details what, if any, actions they have taken to reduce the instances of slavery and human trafficking in their supply chain.

Access has not identified any issues with the modern slavery compliance. None of the suppliers Access Group, including Access Australia, works with contravened the modern slavery standards however we continue to monitor our suppliers and supply chains for risks of modern slavery.

Measuring Effectiveness of Actions Taken

Our new Supplier and Contract Management System enables us to record the compliance of our suppliers and ensure that we challenge our supply chain to re-assert their compliance on an annual basis. An internal audit will be conducted biannually to track the progress on modern slavery and will conduct steps to make sure that the modern slavery is complied with.

Access Australia will follow the Steps for Updating Policies and Procedure in Response to Legislative Change Policy to ensure up-to-date compliance with the legislation by the risk and compliance team, and the legal team. This process includes:

- 1) identifying changes to legislation and regulations,
- 2) identifying the relevant company policies,
- 3) determining if relevant company policies cover or meet the standard the changes,
- 4) updating the relevant policies to meet the standard,
- 5) disseminating notifications and training materials to promote compliance and understanding,
- 6) noting the update in a change log, and
- 7) monitoring and measuring the effectiveness of the updates in meeting the standard the changes set.

Other Matters

This is the first time Access Workspace is submitting a statement under the Act. We recognise and are committed to continued improvement to ensure we continue to better assess and address modern slavery risks. We are committed to taking the necessary steps to prevent modern slavery from occurring within its operations and supply chains.

This statement has been approved by the Board of Access Workspace Pty Ltd in its capacity as principal governing body of Access Workspace on 27 June 2022 and is signed on behalf of the Board by Jae-Uk Kang, Director.

DocuSigned by:

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Jae-Uk Kang

Director

Attachment 1 (Statement Index)

The table below sets out the page numbers of our statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number(s)
a) Identify the reporting entity.	1
b) Describe the reporting entity's structure, operations and supply chains.	1, 2
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	2, 3
d) 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.	3, 4
e) Describe how the reporting entity assesses the effectiveness of these actions.	4
f) 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).	1
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	4