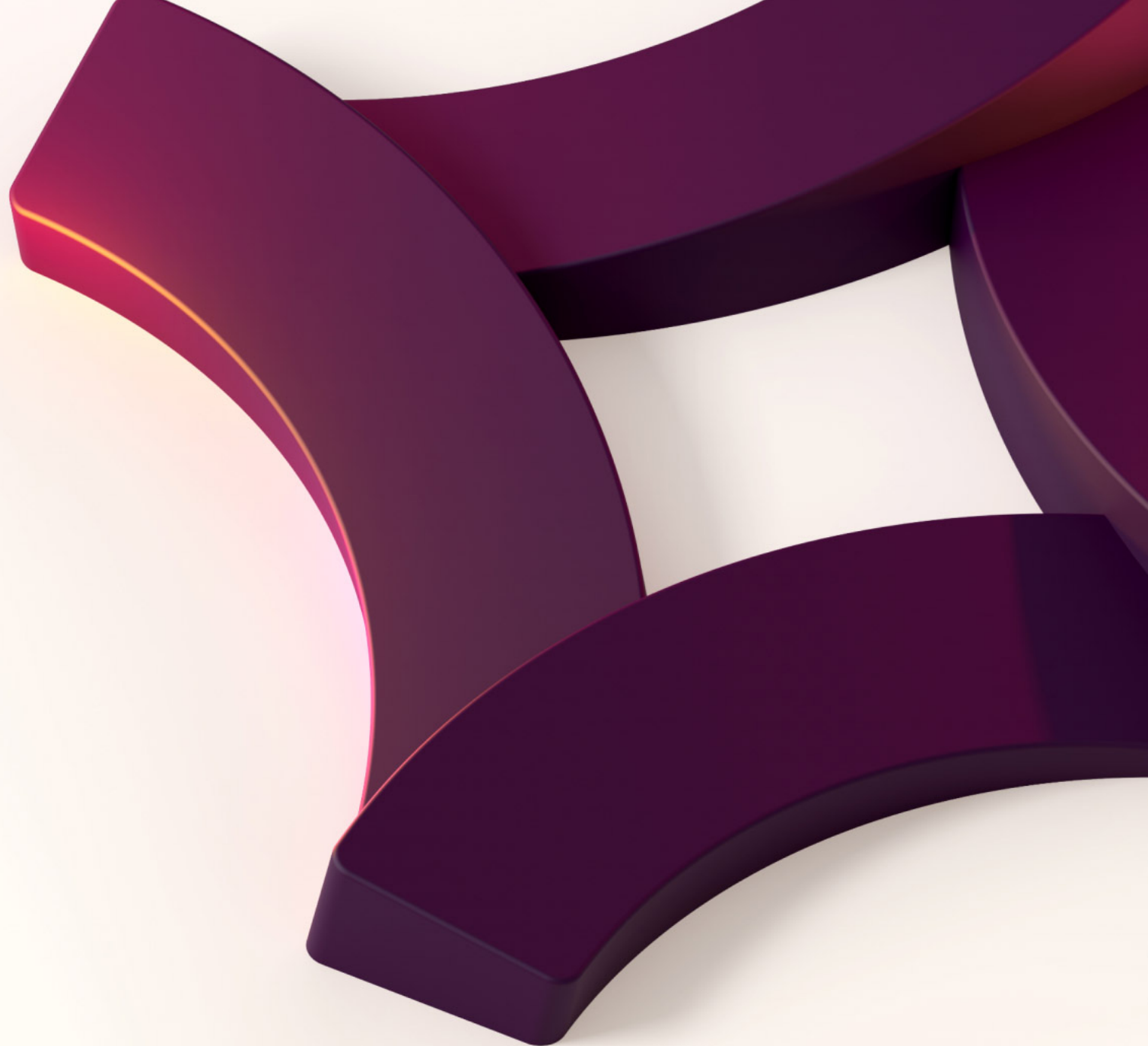


Modern Slavery Statement

For the FY24 Reporting Period



Index

1. Summary
2. Who We Are
3. Operational and Procurement Details
4. Preparing Our Statement
5. Modern Slavery Risks In Our Supply Chain
6. Remediation Priorities
7. Approval

Acknowledgement of Country

We would like to begin our Modern Slavery Statement by acknowledging the Traditional Custodians of the land on which our offices are located – the peoples and nations listed below – and we would also like to pay our respects to Elders past and present.

Brisbane
Turrbal & Yuggera
Peoples

Melbourne
Wurundjeri
People

Canberra
Ngunnawal
People

Adelaide
Kurna
People

Perth
Whadjuk
People

Sydney
Gadigal
People



About this statement

This Modern Slavery Statement is made in accordance with section 14 of the Modern Slavery Act 2018 (Cth) (**MSA**). This is our fifth statement made under the MSA. Our Statement also complies with the UK Modern Slavery Act 2015.

It is a joint statement made on behalf of Pacific Group Topco Pty Ltd (the group's ultimate holding company), and its subsidiaries.

Together, we are Magentus

During FY24 we cemented the group reorganisation of FY23 that brought together our APAC and EMEA Health brands – with further reorganisation to occur in FY25. The supply chain details of Magentus’ health operations are on pages 12-14.

The Citadel Group as a brand and a company is expanding, and set the foundations for growth in FY24 in its key area of secure professional IT services, including its Kapish, Noventus and Gruden brands. Details are on pages 15-16.

Our other Citadel business unit - Citadel Technology Solutions - continues to offer award-winning services to its audio-visual services clients across Australia. Its segment is on page 17.

As with previous years, the Magentus Shared Service team provide support across the divisions and have their own section of our Statement on page 18.



01

Summary

Magentus' Modern Slavery Summary



We said we would do the following in FY24, and we did.

	FY24 Target	Status	Priority for FY25
Process Improvement	Engage with minimum 50% of customers on SEDEX platform	✓ Complete	Maintain engagement
	Identify process improvements through customer engagement	Ongoing	Identify process improvements through customer engagement
Further Data Sharing	Citadel Tech to join SEDEX platform	✓ Complete	Citadel Group to join SEDEX platform
	Citadel Tech published SAQ data	✓ Complete	Citadel Group published SAQ data
Training	Implement new training materials	✓ Complete	Complete annual training
	100% of Key Procurement employees to receive training	✓ Complete	Maintain 100% participation
Direct engagement with high-risk suppliers	Take additional steps with Top 10 Tier 1 suppliers in Citadel Tech to drive deeper engagement	✓ Complete	Ask Top 10 Tier 1 suppliers to confirm they are not aware of any modern slavery risks or incidents in their supply chain.

02

Who We Are

Magentus Group

Magentus Group is the umbrella brand for four different business units:

- Health care (Magentus)
- Enterprise software (Kapish)
- Professional services (Citadel Group)
- AV technology (Citadel Technology Solutions)



Melbourne, Australia

Headquarters



516

Employees in Australia



203

Employees in the UK



> \$218,000,000

Revenue

Magentus Group Structure and Operations



Statement Scope

This Statement is made on behalf of the group's ultimate holding company - Pacific Group Topco Pty Ltd (**Topco**), and its subsidiary companies set out in Appendix 1. In this Statement we refer collectively to all the group companies as 'Magentus Group', or the 'Group'.

This Statement is made for the period 1 July 2023 to 30 June 2024.

Group Operational Structure

- Magentus' operations are organised along geographical and specialism lines. Clinical Systems, Health Informatics and Patient Safety operate through Magentus APAC, and Magentus EMEA. Practice Management operates nationally in Australia.
- Kapish operates nationally and internationally from the Group's Melbourne and Brisbane offices.
- Citadel Group Services has presences in Melbourne, Sydney, Canberra and Brisbane and works closely with government and commercial clients on major technology projects.
- Citadel Technology Solutions supports clients across Australia, leveraging Group office presences, and its own dedicated offices and warehouse facilities across the country.
- Magentus Shared Services provides support across the Group in areas such as Finance, IT, Security Operations, Legal, Risk and Compliance.

Details of the operations of each of these divisions can be found in Section 3 of this Statement.

Magentus Group Structure and Operations



Magentus is arranged in five business units,
with one shared services corporate centre

Magentus

- Anaesthetic Private Practice™
- Data Management Services
- Evolution vLab®
- Charm Evolution®
- Cris®
- Evolution vRis®
- Evolution vLab®
- Euroking®
- eQstats®
- eConsent™
- Gentu®
- Genie®

Kapish

- Kapish® Content Manager Cloud
- K365 Cloud
- Kapish® Productivity Suite



citadeltech Excellence. Always.

- Audio-visual installations
- Secure unified communications



citadel group

- Citadel People
- Noventus
- Gruden®

Magentus Shared Services

- Finance
- Enterprise IT
- People & Culture
- Legal, Risk & Compliance
- Security Operations

03

Operational and Procurement Details



Magentus APAC Operations

Magentus' objective is to deliver better healthcare outcomes through world-class technology.

Magentus APAC's Clinical Systems (Evolution vLab® and Charm®), & Patient Safety (eQstats™) software products were created and are maintained by its talented team of Australian-based developers and implemented by its Australian-based delivery teams. A matrix of other key roles are performed by employees within Australia, such as software and network support, cloud engineering, quality management, and training.

Approximately 146 employees work in Magentus APAC, primarily from our Melbourne and Brisbane offices. They are almost exclusively permanent employees whose employment agreements comply with all applicable Australian laws. Magentus is committed to being an employer of choice, and award-compliant salary makes up only a part of our comprehensive employee value proposition under the MyMagentus program.

Magentus Pty Ltd is the main contracting company for Magentus APAC operations.

Magentus APAC Supply Chain and Procurement

- Magentus APAC is responsible for its own supply chain activities. In respect of goods and services sold, this involves acquiring:
 - leased computer hardware from Australian vendors for installation at customer premises;
 - telecommunications services from Australian and UK telecommunications service providers;
 - Australian private cloud data centre services;
 - physical security services from local companies; and
 - cloud storage and cloud software services from Australian subsidiaries of major US cloud service providers.
- In respect of other activities, Magentus APAC procures:
 - employee education services;
 - marketing services (conferences etc);
 - travel and accommodation services (travel agent, flights, car hire and hotels); and
 - contracts with specialist service providers (fax and SMS message services, helpdesk software and development software licences).

Magentus APAC has a relatively stable supplier base, with ~85% of its spend directed at 11 Australian vendors. Of these, the top two are business forming part of a single hardware manufacturer, and the other a telecommunications provider. Both are Modern Slavery reporting entities. Magentus APAC also uses Magentus Shared Services.



Magentus EMEA Operations

The Magentus EMEA team are the developers behind our radiology and maternity Clinical Systems, CRIS® and Euroking™ and our Patient Safety product, eConsent.

The team is distributed across the UK, but our key operational centre is our Mansfield, Nottinghamshire office. The Magentus Data Management team who deploy and operate our primary care health informatics business operate from our Sunderland office.

We have approximately 186 people in the Magentus EMEA division. These are almost exclusively direct employees whose employment agreements comply with UK employment and other requirements. They also have the benefit of our MyMagentus employee program.

Magentus EMEA contracts with its clients through product-specific operating companies: Magentus Software Limited, Magentus Maternity Software Ltd, Magentus Data Management Services Ltd, and Magentus EHR Solutions Ltd.

Magentus EMEA Supply Chain and Procurement

- Operationally, Magentus EMEA is responsible for its own supply chain activities. In respect of goods and services sold, this involves acquiring:
 - computer hardware from UK vendors for installation at customer premises;
 - telecommunications services from UK telecommunications service providers;
 - UK private cloud data centre services;
 - physical security services from local companies;
 - cloud storage services from US parent vendors with operations in Europe; and
 - cloud software services from US parent vendors with local operations.
- Magentus EMEA also acquires the Evolution vLab® product and related support from Magentus APAC in Australia.
- In respect of other activities, Magentus EMEA procures:
 - employee education services;
 - marketing services (conferences etc);
 - travel and accommodation services (travel agent, flights, car hire and hotels); and
 - contracts with specialist service providers, such as helpdesk software and development software licences.

Magentus APAC also procures many of the services for local consumption that Magentus Shared Services provides to its Australian affiliates. However consolidation of supply relationships across the Group will gradually align major suppliers such as cloud services, with a single group entity that will facilitate recharging on a consumption basis. Other than license fees paid to its parent in Australia, Magentus EMEA's material supplier categories are cloud hosting and professional services.

Magentus Practice Management

Magentus Practice Management (PM) is a software developer and owner. Magentus Practice Management Pty Ltd contracts directly with medical specialists and their practices to supply its locally-installed Genie® Practice Management Software (PMS) and its cloud-based PMS, Gentu®.

PM uses software frameworks developed in Europe and has one transactional support arrangement with an organisation based in the Philippines. This vendor has been scrutinised as part of the Group's risk management program.

Approximately 150 people work in the PM office in Brisbane and across Australia. These are almost exclusively permanent employees.

All permanent PM employees are paid above relevant award rates and have employment agreements that meet Australian legal requirements. PM employees also participate in the MyMagentus employee benefits scheme.

Magentus Practice Management Supply Chain and Procurement

- PM's procurement has gradually moved to group-wide purchasing arrangements in cloud computing and greater utilisation of the Magentus Shared Services division. Where PM is responsible for its own supply chain activities, this involves acquiring:
 - software development services and software consultancy services from local companies;
 - operational support services from local Australian and international vendors;
 - telecommunications services from Australian telecommunications service providers;
 - migration support services from a vendor in the Philippines; and
 - cloud storage and software licences and services from US parent vendors with operations in Australia.
- In respect of other activities, PM procures:
 - leasing and cleaning services for its office in Brisbane, and real estate services for its Perth office;
 - computer hardware from Australian vendors for internal use;
 - employee education services;
 - marketing services (conferences etc);
 - travel and accommodation services (travel agent, flights, car hire and hotels); and
 - contracts with specialist service providers (sms message services, helpdesk software and software licences).

PM's key supplier categories are SaaS licences, cloud services, software and professional services.

Kapish

Kapish Operations

Kapish is a leading software and IT services provider specialising in secure information management, and forms part of the Citadel Group Services business.

Kapish trades through Kapish Services Pty Ltd and Kapish EA Pty Ltd. Kapish Services develops and maintains its own software that operates either independently, or as part of other software packages. A good example of Kapish's proprietary software is the Kapish® Productivity Suite which provides productivity enhancements to a third-party product, Open Text's Content Manager (**Content Manager**). Support and maintenance is also provided for its own and third-party licensed products. Kapish is a Platinum Partner of Open Text.

Kapish Services also operates Kapish® Content Manager Cloud, a market-leading secure cloud platform for Open Text Content Manager. Kapish can deliver Content Manager Cloud in several combinations to suit the customer's needs, but common services include establishing the cloud instance, setup or migration of Content Manager to the Cloud, as well as Content Manager training.

Kapish EA is a specialist part of Kapish and is the foremost reseller of the SAP LeanIX enterprise architecture product in the Asia Pacific region. Kapish EA also implements APLAS, SAP Signavio and Apptio products.

There are approximately 47 Kapish team members split across the Melbourne, Sydney and Brisbane offices. In common with their colleagues in the other divisions, they are rewarded and paid in accordance with all applicable employment laws and awards.

Kapish Supply Chain and Procurement

- Operationally, Kapish is responsible for its own supply chain. This involves the following typical acquisitions:
 - software for resale;
 - software components;
 - graphic design services;
 - contract professional services; and
 - uniform and promotional materials.

Kapish also procures travel and accommodation services (travel agent, flights, car hire and hotels), and uses Magentus Shared Services.

Kapish Services has a small and stable procurement base, with >85% of its spend with two key software vendors. In line with other divisions, Kapish's cloud services are acquired under the management of Magentus Group from US vendors or their local subsidiaries, using services located in Australia. Software is primarily licensed from the US and Europe. No physical installable products are shipped by suppliers to Kapish, or by Kapish to its customers.

Citadel Group Services was formed by the alignment of Magentus' key professional services operations – Gruden, Citadel People and Noventus.

Professional Services

The primary trading entities in the Citadel Group Services division are The Citadel Group Pty Limited, Gruden Pty Ltd, and Noventus Pty. Ltd.

Professional Services provides specialist consulting and personnel services directly or indirectly to Australian government agencies and Australian corporations. The Citadel Group also provides certain managed services to the Australian government. These services align with Citadel's core business of secure information management. Professional services contractors are sourced from within Australia.

Gruden is an expert software development house, focusing on complex bespoke projects, mainly for government clients. Its team specialises in developing and supporting cloud-hosted software. With client consent, Gruden is able to leverage offshore coding services from a supplier of long standing. Gruden's supply chain is stable, with 90% of its direct procurement spend with four vendors, of which one is an international cloud service provider's Australian subsidiary.

The approximately 36 members of the Professional Services team operate from Melbourne, Sydney, Brisbane and Canberra.

Professional Services Supply Chain and Procurement

Operationally, Professional Services is responsible for its own supply chain. This involves the following typical acquisitions:

- software for resale;
- software components;
- graphic design services;
- contract professional services from Australian contractors; and
- uniform and promotional materials.

Professional Services also procures travel and accommodation services (travel agent, flights, car hire and hotels), and uses Magentus Shared Services.

Although a separate business unit, Citadel Technology Solutions (Citadel Tech) is now aligned with the Citadel Group professional services operations.

Citadel Tech Operations

Citadel Tech's key business operations are the design, supply, installation, maintenance and servicing of audio visual and video collaboration technologies across its key verticals of higher education, defence, health, and government.

Approximately 77 people work in Citadel Tech's operations, with the greatest number working from the division's Melbourne office and warehouse, with other operations from its Adelaide, Canberra and Matraville warehouses. All Citadel Tech employees are retained on contracts compliant with Australian law and are remunerated in accordance with applicable awards.

Citadel Tech Supply Chain and Procurement

Citadel Tech's key trading entity is Citadel Technology Solutions Pty Ltd. Operationally, Citadel Tech is responsible for its own supply chain activities. In respect of goods and services sold, this involves acquiring:

- software licensing for video and audio conferencing;
- audio-visual hardware (screens, projectors, speakers, microphones, computing hardware, switchgear etc), from local suppliers, sourced from major global manufacturers;
- cabling, connectors, brackets & other ancillary hardware required for audio-visual equipment;
- vehicles for delivery of goods and transport of technicians;
- qualified trades people for project or longer-term engagements;
- warehousing and storage services; and
- uniforms and promotional materials.

Citadel Tech also procures travel and accommodation services (travel agent, flights, car hire and hotels), and uses Magentus Shared Services.

Citadel Tech has a stable supply chain, with less than ten AV hardware suppliers making up around 60% of its procurement spend. All these vendors are either Australian subsidiaries of major electronics manufacturers (most of whom have detailed Modern Slavery disclosures and some of whom are subject to NGO reporting), or their authorised Australian distributors.

Magentus Shared Services

Shared Services Operations

Shared Services describes three parts of Magentus' business.

The first is the Office of the CEO and the Board. This element of Shared Services manages the group's relationship with its owners (the shareholders), and the activities of its governing body (the Board of Directors of Pacific Group Topco Pty Ltd).

The second is the Corporate Centre, which means the shared services that support the other business units. This includes people & culture, finance, legal, audit, risk and compliance, security operations, property management, and corporate IT.

In this Statement, we refer to the second category of services as Magentus Shared Services. Except for Practice Management, and some Citadel Tech employees, all of Magentus Group's employees and direct contractors are employed through Magentus Group Services Pty Ltd.

The third part of Shared Services is customer facing. Because of the structure of many government panel and procurement arrangements, Magentus Group Pty Limited is a contracting party providing services to customers. It does not provide these services itself, but does so through its operating subsidiaries described above.

Shared Services Supply Chain and Procurement

- Magentus Shared Services division is responsible for procurement on its own behalf, and indirectly for other divisions that use its services. Approximately 77 people work in Shared Services. This involves the following typical acquisitions:
 - employee benefits;
 - recruitment services;
 - marketing services (corporate website) and corporate functions;
 - investor management services (including share registry management);
 - travel and accommodation services (travel agent, flights, car hire and hotels);
 - professional services (non-executive director fees, audit, tax, external legal, other consultancy services);
 - specialist cloud software services and security operations;
 - enterprise software licensing;
 - accommodation services (leasehold property) including fitouts;
 - utilities (commercial rates; heating, cooling, data connectivity and voice, water and sewerage; cleaning (although some cleaning is conducted by landlords);
 - postal and courier services;
 - archiving and secure document destruction;
 - security and alarm services;
 - computer hardware (laptops, desktops, mobile devices, printer/copier leases);
 - tea, coffee, catering, (including vending machines); and
 - office supplies.

Shared Services' top four procurement categories are (1) software/platform-as a service'; (2) rent and outgoings on leased premises; (3) professional IT services; (4) other professional services (legal, audit, cyber security and other consulting).

These services are predominantly obtained through Australia-based suppliers, though in the case of certain goods, countries of manufacturing origin may include China, Malaysia and Vietnam.

04

Preparing Our Statement

How This Statement Was Prepared



Corporate Authorisation

Under its Constitution and Shareholders Deed, Pacific Group Topco Pty Ltd's Board of Directors is ultimately responsible for Magentus' management, and by virtue of its ability to control the boards of each of its subsidiaries, it is able to influence the conduct of activities by the subsidiaries.

The Board of Pacific Group Topco Pty Ltd and each of its wholly-owned subsidiaries have supported the cooperative engagement by entities covered by this Statement in the processes and activities it describes. There is effectively one management team across each of the UK and Australian businesses, simplifying the group's Modern Slavery activities.

Activities

The Group Company Secretary, with assistance from area specialists, has managed the process of preparing this Statement.

Due diligence activities have included:

- drawing supply chain data from financial and inventory management systems;
- verifying and categorising the underlying use and nature of goods;
- analysing spend categories and volumes;
- assessing any new or revised publicly-available supplier statements compared to the prior analysis period;
- risk-assessing new suppliers during the reporting period;
- analysing updated NGO data on key suppliers;
- issuing and assessing supplier self-assessment questionnaires; and
- conducting open-source intelligence gathering on risk-rated suppliers.

05

Modern Slavery Risks in Our Supply Chain

Modern Slavery Risks in Our Operations & Supply Chain



Risk Identification

- Magentus Group’s software development, professional services, consulting and advisory operations are conducted through the personal efforts of our own professional and trade-trained Australian and UK employees and some specialist contractors.
- We have a small number of long-standing overseas-based suppliers, including in a Tier 2 and Tier 2 Watch list country, though as reported in our last Statement, we remain satisfied that the services we acquire are unlikely to be exposed to Modern Slavery. Particular attention has been paid in the Reporting Period on assessing additional overseas supply candidates against modern slavery risk practices.
- For those team-members working on-site, we procure for them office space, communications and technology devices, and associated office-related products and services including cleaning, catering and beverages such as tea and coffee. Some contractors and employees work at client sites, and clients are responsible for some of these services.
- Modern Slavery risks exist in Magentus Group’s supply chain. The greatest risks arise from goods that originate from heightened-risk countries and in heightened risk sectors (often these both occur simultaneously). These are third, fourth or even greater tiers in the supply chain, and assessment of these exposures remains difficult. However, as noted in our prior Statements, in addition to reliance on our Tier 1 supplier modern slavery disclosures, we use NGO reports on these distant-tier suppliers, augmented by an open-source intelligence tool to monitor publicly-reported information globally concerning these supply chains that will alert us to any meaningful reports of potential non-compliance activities. We have also reverted to more direct engagement with our Tier 1 suppliers to attempt to elicit more direct information from their suppliers.
- Magentus Group has identified in Appendix 2 the key risks of Modern Slavery facing the Group. Magentus Group has also identified the key business unit or subsidiary with the most direct connection to these risks, and the “UN Guiding Principles” categorisation in terms of causation, contribution and direct linkage.

Modern Slavery Risks in Our Operations & Supply Chain



Risk Assessment

Departmental Guidance

- In assessing its Modern Slavery risks, Magentus Group continues to have reference to Table 6 of the Guidance for Reporting Entities issued by the Australian Department of Home Affairs (**Guidance**), and the Department's supplementary guidance.

NGOs

- Magentus Group has examined the latest reports from key NGOs involved in its higher-risk supply chain areas, including the 'Know the Chain' 2022/2023 Benchmark Study of ICT Companies and the specific assessments by KTC of Tier 1, Tier 2 or in some cases Tier 3 technology suppliers to the group. As previously reported, we have adapted our assessments following the changes in assessment methodology in the latest KTC report.
- Magentus Group has also had reference to labour exploitation analyses from NGOs such as the Walk Free Foundation. We have also referred to the United States Department of State Trafficking in Persons Reports for 2024 in conjunction with our self-assessment questionnaire template and risk scoring system. We note the small improvements in the modern slavery environment reported by the State Department in relevant countries.
- An uplift in the number of Magentus Group's suppliers that are required to provide Modern Slavery Statements has assisted the Group in assessing the approaches to addressing Modern Slavery of its larger suppliers. As noted last year, there has been a marked shift in the quality and presentation of Modern Slavery Information amongst some suppliers which has given us greater confidence in some aspects of our risk assessment.

Modern Slavery risks in our operations & supply chain



Actions Taken

Reinforce awareness

Modern slavery awareness training continues as a feature of the group's mandatory annual training. In the reporting period we have added in fresh training materials for our enterprise-wide Learning Management System to reduce training fatigue. We have also conducted small-group training in our higher-risk procurement team to deepen understanding and improve modern slavery risk management skills.

Supplier rating and engagement

Suppliers to certain business units in the Magentus Group with higher risk products and services were issued with SAQs in this Reporting Period in order to obtain more information than has previously been available. This was partially successful. We also engaged with a number of high-value higher risk suppliers to procure greater levels of contracted modern slavery undertakings.

Implementation of Supplier Code

Citadel's Supplier Code of Conduct incorporated through its Australian Purchase Order Terms and Conditions was used in almost 98% of FY24 purchase orders. The 2% variance is explained where a more substantive contract is in place, but Purchase Orders are still required.

Supplier monitoring

In the period, Magentus Group in partnership with its Modern Slavery consultant, has continued its Supplier monitoring system using a combination of open-source intelligence techniques to monitor distant-tier risk-weighted suppliers for Modern Slavery issues. We have identified no negative reports in the checks on our higher-risk Tier 2/3 suppliers.

06

Remediation

Remediation – FY24 Metrics



For the reporting period, we used the following metrics to test our progress.

Process Improvement

As part of its membership of SEDEX, Magentus has had the benefit of additional analysis of its existing modern slavery processes, procedures and compliance activities. In FY24, Magentus Group will seek to improve its performance in these key areas and will engage with customers using SEDEX to develop better and ultimately best practice in areas not only of Modern Slavery, but also other ESG topics. Engaging with at least 50% of its SEDEX-connected clients will be the aim.

Further data sharing

Building on Magentus and Kaphish's SEDEX experience, Citadel Group and Citadel Tech will prepare data for inclusion in the SEDEX index. Our objective will be to complete the data analysis and to make it available by the end of the next reporting period.

Level-up training

Magentus will maintain or update its Modern Slavery awareness training that is delivered across the Group. In FY24, it will also provide focussed training to key individuals who have a greater procurement involvement, specifically to raise awareness of our Modern Slavery Policy as it relates to procurement. Success will be measured by the percentage of procurement-focussed employees completing the training.

Remediation – FY24 Metrics



How did we do?

Process Improvement

In the Reporting Period, we reached out to our SEDEX-engaged customers in order to discuss our SEDEX management controls scoring. Despite reaching our goal of 50% contact, we were unable to make much meaningful progress. However we still see value in understanding what better and best practice might look like, so we will make further attempts in FY25.

Further data sharing

Citadel Tech successfully joined the platform and published its SAQ data in the Reporting Period, but Citadel Group did not. This was a resourcing issue that we intend to remedy in the FY25 year.

Level-up training

Magentus updated its Modern Slavery training, and shifted to a new learning management system (LMS) with rolling annual reporting. In the Reporting Period we also provided focussed training to key individuals who have a greater procurement involvement, specifically to raise awareness of our Modern Slavery Policy as it relates to procurement. 100% of the key procurement employees undertook the training.

Direct engagement with high-risk suppliers

In a slight shift in our Modern Slavery risk management planning for the Reporting Period, we identified an opportunity to take additional steps with our top ten Tier 1 suppliers in Citadel Tech to try to drive deeper engagement with their own supply chains. We had mixed results, with many of our Tier 1 suppliers being distributors, the tendency was again to redirect us to the product manufacturers rather than assuming responsibility to engage with their own supply chain to assist their customers. That this perception persists is disappointing for us as a customer, and makes providing information to our own customers difficult.

Remediation – FY25 Metrics



For the next reporting period, we plan to use the following metrics to test our progress.

Process Improvement

Although we met our target for engagement in the Reporting Period, we were dissatisfied with the improvements and intend to redouble our efforts to engage with our SEDEX reporting customers and generate meaningful improvements in our Modern Slavery management controls.

Further data sharing

Citadel Group will join SEDEX and complete its management controls submission in FY25. We will also refresh our existing data For Magentus, Citadel Tech and Kapish following SEDEX platform changes.

Further direct engagement with high-risk suppliers

We are not content with the direct engagement from our Tier 1 supplier in the Reporting Period, so intend to organise higher level engagement in FY25.

Approval



This Statement was approved on 18 December 2024 by the Board of Directors of Pacific Group Topco Pty Ltd on its own behalf and on behalf of each of the entities identified in Appendix 1.

Mark McConnell
Executive Chairman and Director
Pacific Group Topco Pty Ltd

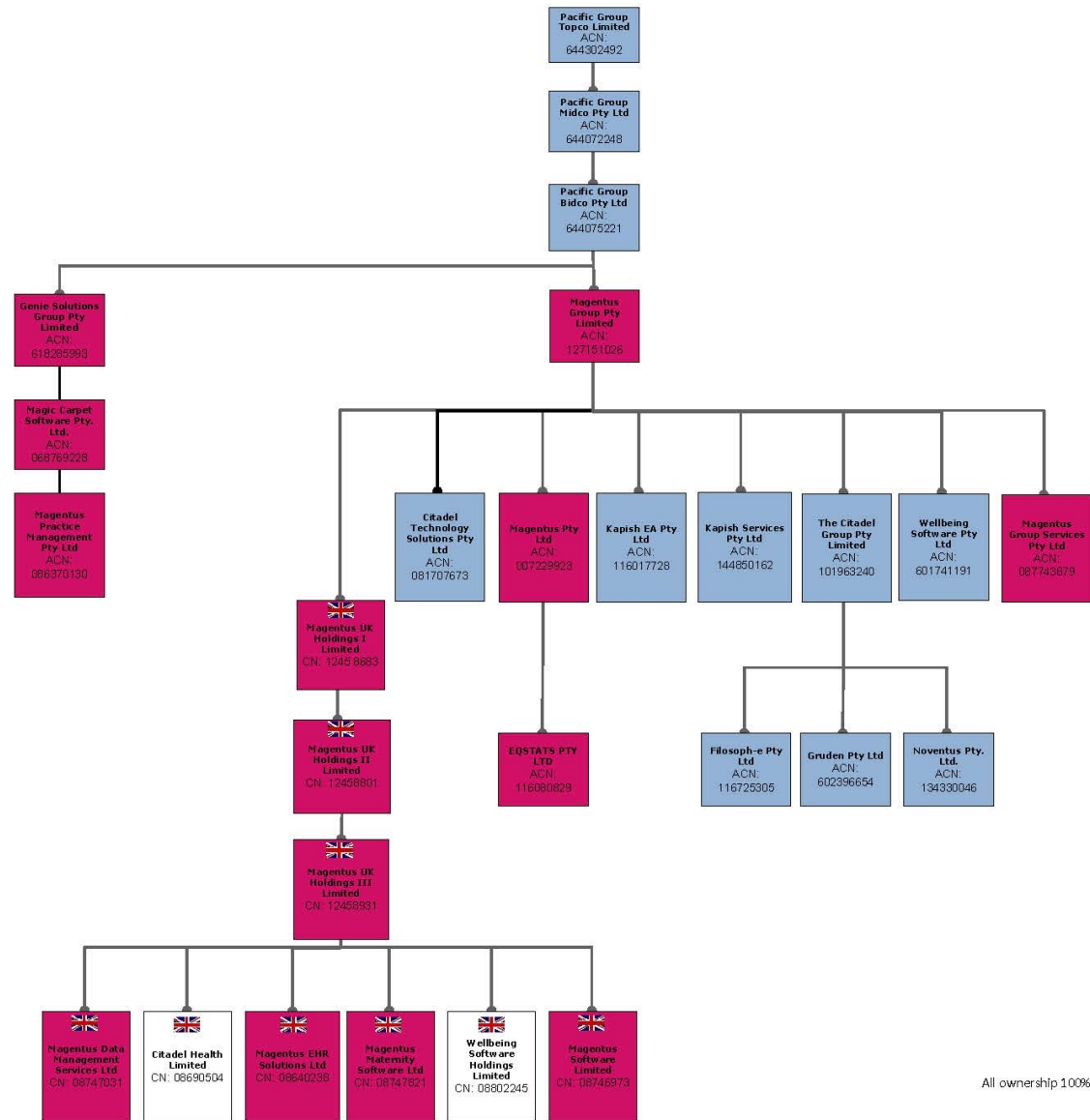
46/600 Bourke Street
Melbourne VIC 3000
Australia

Appendix 1

Magentus Group Structure

Group Structure

Magentus group structure at the end of the reporting period.*



All ownership 100%.

Magentus brands



www.magentus.com



www.kapish.com.au



www.citadelgroup.com.au



www.citadeltech.com.au



www.citadelpeople.com.au



www.noventus.com.au



www.gruden.com.au

Appendix 2

Magentus Supply Chain Risks

Magentus Group Supply Chain Risks



Risk#	Risk	Proximity	Business	Linkage	Description
1	Extractive industries	Indirect	All divisions	DL	The following objects each rely on extractive industries for key components: AV technology products that Citadel Tech procures for its customers; computing devices (mobile and static) that Magentus and Shared Services procure for their own use; and the computing devices used by the cloud service providers used by Magentus, Citadel Group and Kapish.
2	Debt Bondage	Indirect	All divisions	DL	The products identified above may be sourced from countries such as Malaysia, where there is potential for migrant labourers to be coerced or induced into debt-bondage arrangements in production facilities.
3	Labour Exploitation	Indirect	All divisions	DL	The products identified above may be manufactured in factories in China where owners make extensive use of unpaid 'interns' under vocational training regimes.
4	Labour Exploitation	Indirect	All divisions	DL	The goods above and more generally are shipped to Australia and the UK. Although the Group has no visibility over shipping lines used there is a risk of shipment using ships registered under 'flags of convenience'. These vessels frequently have low labour standards and crew members cannot leave ships in foreign ports without permission or face the risk of immigration detention.
5	Textiles	Indirect	All divisions	DL	The affected divisions purchase small numbers of articles of clothing for staff use – mainly in promotional situations such as trade shows and while required under customer contracts. However in the reporting period due to the rebrand, there was a greater consumption of these goods. These may be sourced from countries such as Bangladesh, India, Pakistan and China; countries which have documented risks of child and forced labour.
6	Labour exploitation	Indirect	All divisions	DL	Through its landlords, and in some cases directly, the Group consumes cleaning and facilities maintenance services, sectors which (notwithstanding clear and strong labour laws in each country), rely in some cases on recent migrants to Australia and the UK, who can be vulnerable to exploitation.

Appendix 3

Compliance Table

Compliance Table



Mandatory criteria	Page numbers
a) Identify the reporting entity	3,9
b) Describe the reporting entity's structure, operations and supply chains.	9-18, 30
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.	21-24, 33
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.	21-27
e) Describe how the reporting entity assesses the effectiveness of these actions.	26-27
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).	20
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant	N/A



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