



Modern Slavery Statement

1 Our statement

- (a) Pronto Software Limited ACN 001 337 248 (**Pronto Software**) and its related bodies corporate (**Pronto Group**) are a technology group that develops and provides software and associated information technology services. Pronto Software and Pronto Group are opposed to all forms of slavery.
- (b) Pronto Software is a reporting entity as defined by section 5 of the *Modern Slavery Act 2018* (Cth) (the **Act**). This statement is made pursuant to section 14 of the Act. Pronto Software Limited is the reporting entity for the purposes of this statement.
- (c) Pronto Group comprise the following:
 - (i) Pronto Software Limited; and
 - (ii) Its related bodies corporate (all wholly owned subsidiaries)
 - (A) Pronto Cloud Pty Ltd;
 - (B) Pronto Software Licencing Pty Ltd;
 - (C) Pronto Software International Pty Ltd; and
 - (D) Pronto Software, Inc.
- (d) Pronto Software adopts the definition of “modern slavery” in the Act, which includes slavery, human trafficking and forced labour.
- (e) At Pronto Software, we recognise our community responsibility in maintaining the protection of human rights through Pronto Software’s own ethical business practices. Pronto Software also recognises that the maintenance of human rights laws and standards is an important issue to our employees, customers, suppliers, shareholders, stakeholders and the global community. Therefore, Pronto Software seeks to ensure that human rights are valued across Pronto Software’s global businesses, operations, and supply chains.
- (f) Pronto Software respects these globally recognised instruments:
 - (i) Universal Declaration of Human Rights;
 - (ii) United Nations Guiding Principles on Business and Human Rights;
 - (iii) United Nations Global Compact;
 - (iv) International Labour Organization Declaration on Fundamental Principles and Rights at Work;
 - (v) United Nations Women’s Empowerment Principles; and
 - (vi) United Nations Sustainable Development Goals.

- (g) Pronto Software considers the risk of modern slavery as low to moderate as its products and services are driven by knowledge management inputs, as opposed to inputs involving physical assets. Those knowledge management inputs are provided mainly by full time employees based locally in Australia as well as in Sri Lanka. All employees must abide by codes of ethics and conduct that facilitate best practice. Additionally, staff in Sri Lanka are employed on comparable Australian rates and in accordance with Sri Lankans laws. Where Pronto Software forms a view that Australian laws should be applied, practices that align with Australian laws are adopted and implemented in addition to compliance consideration in relation to Sri Lankan laws.
- (h) Pronto Software accepts a low to moderate modern slavery risk assessment, which may be affected by the policies and practices of its major vendors and suppliers. Pronto Software continues to review and update its Risk Management Policy regularly to manage such risks as may arise from such policies and practices. Consistent with our Risk Management Policy, Pronto Software adopts a risk-based approach to modern slavery due diligence in its operations and supply chains. As part of its review of terms of engagement with vendors and suppliers, Pronto Software may require inclusion of anti-modern slavery provisions in the relevant contracts.



2 Our structure, operations and supply chains

- (a) Pronto Software's operations occur in Australia, Sri Lanka, and North America. All entities within the Pronto Group are identified on the Pronto Software website (pronto.net/legal-notices) each year.
- (b) Pronto Software develops software, runs research and development programs and provide professional services. With our continuous development of products, Pronto Software has been helping organisations for more than 45 years.
- (c) Pronto Software has a workforce of more than 470 people globally. Pronto Software also works with various suppliers, business partners and other key stakeholders. We recognise that the operations and supply chains of these stakeholders have their independent obligation to observe human rights laws and standards. Accordingly, while our operations and supply chains may be multifaceted, we endeavour to ensure that the issue of modern slavery is understood and respected and that human rights laws and standards are observed.
- (d) Pronto Software expects the supply chains, business partners and other key stakeholders of Pronto Group to observe ethical business standards consistent with Pronto Software's long history of carrying out business in an ethical and responsible manner, and remains committed to working with its supply chains, business partners and other key stakeholders to fulfil this aspiration.
- (e) The Risk and Compliance department of Pronto Software has a process to manage vendors and suppliers that include the assessment of modern slavery risks and compliance with the Act as well as the policies and processes of Pronto Software. This process includes an initial assessment of risks and an annual review that includes a tailored questionnaire to vendors and suppliers identified under the policies and processes. The outcomes of such assessments and reviews, including responses to questionnaire, are documented and reviewed as required from time to time. Such documentation and review form a part of the ISO 27001 audit process which includes review of modern slavery risks as they pertain to vendor management and supply chain risks.
- (f) Risks associated with engagement of vendors and suppliers are reviewed regularly as and when required. Such reviews are conducted by the Chief Financial Officer and Security and Risk Committee of the Board.

3 Our policies and governance

- (a) Supply chain and vendor management functions and tasks reside with the Finance, Legal, Risk and Compliance teams of Pronto Software. All vendor management tasks and related sourcing and purchasing functions for all entities of the Pronto Group are reviewed, approved and managed by members of the Finance, Legal, Risk and Compliance teams of Pronto Software.
- (b) In performing its functions and tasks, Pronto Software is guided by policies and governance frameworks approved by the Board of Directors.

Policies

- (c) Pronto Software's policies and governance framework support its day-to-day operations and are intended to ensure all relevant commonly recognised human rights laws and standards are observed.
- (d) Consistent with the Pronto Software Policy and values, Pronto Software is committed to making positive economic, social, and environmental contributions to society, consistent with the principles of honesty, integrity, fairness and respect.
- (e) Pronto Software opposes discrimination and modern slavery, and remains committed to safe working conditions, including the right to freedom of association and collective bargaining.

Governance

- (f) Issues of modern slavery in Pronto Software's operations and supply chains are managed by senior and delegated managers with purchasing and appropriate delegated authority who identify, assess and manage modern slavery issues with our suppliers. This is done through a variety of means including "knowing our suppliers", being in regular contact with and personally visiting our suppliers (where appropriate), conducting reasonable due diligence in relation to our suppliers (and choice of suppliers) and reviewing and assessing the performance of our suppliers using qualitative and quantitative criteria.
- (g) Procurement and business units record compliance obligations and risk management matters through the Pronto Software Enterprise Risk Management Framework. These compliance obligations and risks are regularly reviewed and assessed, along with the identification and assessment of the effectiveness of Pronto Software's internal controls, processes, procedures and mitigation strategies to minimise both the occurrence and impact of any failure.
- (h) Ethical sourcing and human rights issues are overseen through regular reporting to the Pronto Software Board of Directors.

4 Our risk assessment and due diligence processes

- (a) Pronto Software has adopted a risk-based approach to modern slavery due diligence and continues to review the risk of modern slavery practices across our operations and supply chains.
- (b) Pronto Software is focused on respecting the human rights of our employees and the human rights of those in our supply chains. Given that compliance and risk management is an ongoing activity, Pronto Software continues to work to improve its supply chain due diligence processes.

Respecting human rights in our supply chains

- (c) While our operations and supply chains are multifaceted, our aim is to ensure that human rights are respected and understood. Our due diligence includes the following actions:

Establishing which suppliers to work with

- (i) Taking a risk-based approach, the decision to conduct detailed due diligence on a supplier is based on the goods or services, industry, country of origin and particular vendor.
- (ii) Before we contract with a new supplier who may be identified as high risk, we require that supplier to complete a self-assessment questionnaire.
- (iii) Pronto Software considers whether there may be any government mandated trade sanctions or bans that may be in place against that supplier or the country in which it is located.

Communicating our ethical and responsible sourcing policy to suppliers

- (iv) Pronto Software will only contract with suppliers to supply goods or services who operate in line with our policies, processes and standards. This is communicated formally to our suppliers.
- (v) Suppliers must agree to act transparently, to remedy any adverse or at-risk issues, and to drive continuous improvement.

Building long-term relationships

- (d) Pronto Software aims to build and develop long-term relationships with its suppliers. Pronto Software believes that long-term relationships can lead to meaningful exchange that will enhance safeguarding of human rights; they can also lead to increased certainty on quality, to increased efficiencies and productivity and in the delivery of enhanced products and services.

Risk assessment and mitigation

- (e) Pronto Software continues to increase its collaboration with internal and external stakeholders to play its role to identify and manage the global risk of modern slavery. Pronto Software is focusing on raising awareness of the forms of modern slavery among its employees and suppliers, continuing to evolve its due diligence processes to aid in the identification of risks, expanding the scope of its supply chain risk assessment, reviewing existing processes and exploring ways to improve identification and action on risks throughout its supply chains.
- (f) Pronto Software will continue to endeavour to incorporate modern slavery contract clauses into existing and new contracts and embed modern slavery risk management into existing operational systems and processes.

Remediation

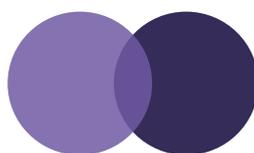
- (g) If non-compliance is identified, the supplier is required to fix the issue within an appropriate period of time depending on the nature and severity of the non-compliance. If a supplier addresses non-compliance, it is deemed to be an “approved” supplier. In this way, our audit process is contributing to improving conditions for workers by working with suppliers to address any issues. If a supplier is not willing or able to address a critical breach, our business will stop purchasing or working with that supplier.

Training and capacity building

- (h) Pronto Software keeps its buying teams up to date on ethical sourcing and human rights commitments. We have also constructed a plan for initiating a specific training program for relevant employees on the impacts and risks of modern slavery.

Effectiveness of grievance mechanisms

- (i) Pronto Software places importance on the provision of effective company-based grievance mechanisms to escalate issues wherever human rights impacts occur in its operations. We continue to build the awareness and knowledge of our employees on human rights, encouraging them to speak up about any concerns they may have, without fear of retribution and with full confidentiality if required. They can speak up informally or through our whistle blower and human resources grievance channels. We also promote the provision and implementation of effective grievance mechanisms by our suppliers.
- (j) Pronto Software’s procurement team is responsible for building relationships with our supply chains and providing grievance channels. This has also been introduced within our new contracts with suppliers, which include specific expectations on modern slavery.



5 Review of this statement

- (a) Pronto Software will review this statement periodically to ensure it complies with applicable legal requirements and remains relevant and effective.
- (b) This statement is not intended to be contractual in nature.
- (c) The Pronto Software Board of Directors may change this statement at any time.

6 Access to this statement

This statement will be available at pronto.net/legal-notice

7 Change history

This Statement is dated 16 September, 2024.

This statement has been approved by the Pronto Software Limited Board of Directors.



Chairman

Bob Johnson



Managing Director

Chad Gates



We are an Australian developer of award-winning business management and analytics solutions. Pronto Xi, our Enterprise Resource Planning (ERP) software, integrates accounting, operational and mobile features in a single system – optimising business processes and unlocking actionable insights. That’s why for more than 45 years, over 1,500 Australian and global organisations, across a wide range of industries, have trusted Pronto Xi to simplify their most complex challenges.

With headquarters and our Development Centre located in Melbourne, we have support offices and consultants based across Australia, as well as a global network of Resellers and Solution Partners. Specialised business units within Pronto Software have the expertise to assist you with pivotal technology – Digital Transformation with Pronto Woven, Cloud and Hosting services with Pronto Cloud and Business Intelligence solutions with Pronto iQ.

When you choose Pronto Software, you gain a team with deep industry experience, giving us the ability to understand your specific needs and build innovative solutions that drive business growth and revenue.

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