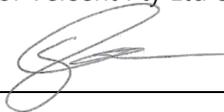


# Versent Modern Slavery Statement

## 1. ABOUT THIS STATEMENT

This Modern Slavery Statement (Statement) describes the actions undertaken by Versent Pty Ltd (Versent) and its subsidiaries (hereafter referred to as Versent Group) to prevent modern slavery and human trafficking. This Statement is issued in accordance with the Australian *Modern Slavery Act 2018* (Cth) hereafter referred to as the Australian MSA and covers the period of 1 July 2021 to 30 June 2022 (FY22).

This Statement was approved by the board of Versent Pty Ltd in their capacity as principal governing body of Versent Pty Ltd on 27 October 2022.



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**Thor Essman**  
Chairman

## 2. INTRODUCTION

### Our Vision and Values

Versent Group's mission is to build a future free from constraint, with a purpose to be better. This is underpinned by our core principles of Be an Owner, Balancing People & Commercials and striving for Done Done. These core values are fundamental to who we are and how we operate.

## 3. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### Our Structure

Versent is a privately owned company with subsidiary businesses that aim to support the overall functions of Versent Group. Versent Group includes the following:

- Versent Pty Ltd;
- Versent Group ESS Pty Ltd;
- Versent SG PTE. Ltd; and
- Stax-WMS Pty Ltd.

### Our Operations

Versent Group is one of Australia's leading providers of cloud, security, identity, digital modernisation, application development and managed cloud service providers.

Founded in 2014, we are a wholly owned Australian business with more than 500 staff. We have a strong, established business across Australia with teams in Melbourne, Sydney, Brisbane, Adelaide and Perth, and a growing presence in Singapore and the United States.

Versent Group has seven core technical practices that deliver services to our customers – these are:

- Cloud Adoption/Migration;
- Identity & Security;
- Application Development;
- Data and Insights;

- Digital Experience and Modernisation;
- Managed Services; and
- Stax - Cloud Management Platform.

## 4. RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

Versent Group has assessed the risk of modern slavery within our direct business operations as low, given our comprehensive, internal human capital management combined with most of our suppliers are large corporations with established Modern Slavery policies. However, we recognise that we may be indirectly exposed to these risks through our supply chain and partner network.

We have not been made aware of any allegations of human trafficking / slavery activities against any of our subsidiaries, suppliers, or partners. If an allegation were to be made, we would take the appropriate actions immediately which would include informing the relevant authorities.

### Risk spends categories via our supply chain and partner networks

The majority of our spend is on human capital. The remaining supply chain (98%) is predominately with government and large enterprise who have established modern slavery policies. We assess these suppliers as low risk. We do recognise we have some spend with external advisory firms or agencies for marketing, recruitment, payroll, and training activities which are with smaller providers. These are considered medium risk due to their size.

### Higher risk locations

Based on information sourced from the Global Slavery Index, we believe that our higher-risk locations may be in Singapore, however we do not believe we have any material exposure.

## 5. ACTIONS TAKEN TO ASSESS AND ADDRESS IDENTIFIED MODERN SLAVERY RISKS

Versent Group has established processes to assess and address modern slavery risks in our operations and supply chains. Our key focus areas to address the risks include:

- Policies
- Employee Management
- Training and Awareness
- Risk Assessments

### Policies

Versent Group has implemented a variety of policies to encompass our compliance to modern slavery. These policies reflect our ongoing commitment to ensure our systems, relationships, and controls are in line with ethical modern slavery practices.

The policies provide an infrastructure for exposing unethical or illegal behaviour which may present concerns under modern day slavery and trafficking legislation and regulations, thereby mitigating the risk that Versent Group has internal compliance issues.

- Code of Conduct
  - Outlines principles and standards that all employees and third parties acting on behalf of the company must follow.

- Anti-Harassment and Bullying
  - Supports and promotes workplaces free from harassment and bullying.
- Grievance Policy
  - Ensures a fair, safe, sensitive, and expeditious grievance handling process.
- Equal Employment Opportunity and Anti-Discrimination Policy
  - Supports diversity in the workplace and promotes fair and equal treatment and rights for all Employees.
- Whistle-blower Policy
  - Sets out information on whistle-blower disclosures, investigations, and protections.
- Overtime and Leave Policies
  - Outlines the minimum entitlements and employer-offered leave and overtime benefits for Versent Employees.
- Versent Partner Code of Conduct
  - Outlines principles and standards that all Versent Partners must follow.

## Our Employees

Versent Group utilises reputable recruitment agencies to source employees and ensure we are compliant with the applicable labour laws.

Versent Group has strong processes for the recruitment, onboarding and rewarding of our all our direct employees. As such, Versent has implemented the following:

- Monitor the hours worked through the utilisation of timesheet systems that are in line with the Australian Modern Awards;
- Employee well-being programs;
- Annual salary review to ensure compliance with the market and legal obligations;
- Overtime policies; and
- Annual review of our employment contracts to ensure legal compliance.

Our People & Culture team, in partnership with our People Leaders (Managers), work closely to identify and address with Employees or third-party agencies concerns and areas of non-compliance with our corporate values and policies. In doing so, we co-create a dynamic and purposeful company culture that we can be proud of and want to belong to.

## Training

All new Versent Group Employees undergo onboarding and compliance activities that cover obligations under Versent Groups' policies. As policies and practices are updated, they are centrally shared with all Employees with an expectation that they are carefully reviewed and acknowledged.

All policies are made available to Employees via Confluence.

## Our supply chains and partner network

Versent Group strives to do business with customers, partners and suppliers of sound business character and reputation. Versent Group does not knowingly support any public or private organisation which espouses unethical or discriminatory policies or practices.

### **What we buy:**

Our procurement generally consists of the following:

- **Technology** – This is our main external spend category and includes software, cloud platform services, hardware, computers, video technology and network technology. Most of our suppliers are top tier companies such as Amazon Web Services, Apple, Dell, and Microsoft.
- **Facilities** – Versent has offices and Employees in three different countries with corresponding spend on facilities services including cleaning services, office maintenance, energy and utilities, waste management and security, as well as furniture supplies, consumables, and stationary.
- **Marketing** – This includes spend on online marketing, advertising agencies, events, travel, and entertainment.
- **Professional Services** – This includes spend on consulting, advisory, software development and legal services.

### **Who we partner with:**

Versent Group has several different types of partners including resellers, distributors, advisories, and service providers including training and recruitment

A Versent Group Partner is defined as all Versent business partners (and all personnel or representatives employed or engaged to provide services to those business) including but not limited to Versent distributors, resellers, agents, and any other party to a Versent Group partner or channel agreement.

Versent Group recognises that its Partners may operate in different legal and cultural environments and Versent Group Partners must comply with the fundamental legal and ethical principles described in the Partner Code of Conduct which is a condition of a Versent Group Partner or Channel agreement.

Versent Group expects all its Partners to perform their work with honesty, truthfulness, and integrity. The Partner Code of Conduct articulates the policy of Versent, and our expectation of Versent Group Partners to comply with all applicable laws, human rights, and labour standards.

## **6. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS**

We are committed to applying a continuous improvement approach to how we reduce the risk of modern slavery practices within our supply chains and operations.

We will seek feedback from our Employees, Suppliers, Partners, and other parties regarding the success or otherwise of the actions we have taken to reduce the risk of modern slavery.

## **7. CONSULTATION WITH REPORTING ENTITIES AND OWNED OR CONTROLLED ENTITIES**

This Statement was developed through a consultation process with relevant departments and involved consultation with the reporting entities.

Versent Group established a team consisting of key departments, including, Commercial, Legal, People and Culture, and Finance departments. These departments co-operated to develop this Statement and create a draft for review.

This statement was approved by the board of Versent in their capacity as principal governing body of Versent on [date].

## 8. RECENT DEVELOPMENTS AND LOOKING FORWARD

### Impact of COVID-19 to our supply chain

In accordance with our corporate values, we are committed to maintaining strong supplier relationships and fostering open communications with our suppliers about COVID-19 risks and are pleased to report we have not identified an increased risk of modern slavery to workers in our supply chain for the reporting period.

### The Year Ahead

We are committed to assessing the risks in our operations to ensure the steps we take to protect against modern day slavery and human trafficking are relevant and effective. As such, in the financial year ending 30 June 2022 we aim:

- To further assess and review our existing supplier and partner network's compliance with the law and their reputation, issue a supplier/partner questionnaire.
- To front-end our awareness of partner and supplier compliance, amend our current third-party risk assessment to include questions aimed at uncovering potential modern-day slavery and human trafficking issues, and eliciting minimum commitments with respect to ongoing compliance.
- To ensure our policies and recruitment processes are appropriate to protect against modern day slavery and human trafficking, conduct a review, and prepare a first draft of a new modern day slavery policy which will (when finalised) be dispersed to Versent personnel. This will educate Employees about the causes and impacts of modern slavery, thus enabling them to promptly identify and report any issues.
- To further enhance and communicate our position against modern day slavery, include specific clauses regarding compliance with Modern Slavery legislation for all new partner and supplier contracts.