

Statement under the Modern Slavery Act 2018
(Reporting Period FY 21 – 1 July 2020 to 31 March
2021)

15 September 2021

Attra Pty Limited
Version 1.0

Reporting Entity

This modern slavery statement is made pursuant to the Modern Slavery Act 2018 on behalf of Attra Pty Limited (ABN 49 069 325 088) and its wholly owned subsidiary companies globally (henceforth referred to as "Attra").

Operations

Established in 1995 as a high-end consulting firm in Australia, Attra has grown over the years into a global company with a presence in 4 continents and a customer base that spans 24 countries. It has sales, marketing, and development centres around the world and employs over 2,000 people.

Attra provides IT Services including Project Management, Business Analysis, System Analysis, Requirement Writing, Development/Maintenance of software, Application integration, Digital services, Migration, Quality Assurance, User Acceptance Testing, Implementation, Environment Management, IT Governance and ongoing IT Application Support Services to clients in the Banking, Financial services, and Insurance domain with a focus on payments technology.

In its quest for quality Attra is appraised with CMMI Level 5 Dev, SVC v2.0, and is PCI DSS, SSAE 18/ISAE 3402 and ISO 27001 certified.

Identifying Potential Modern Slavery Risks

Modern slavery includes trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. In identifying potential modern slavery risks, Attra recognizes that it may cause, contribute or be directly linked to adverse modern slavery impacts as a result of its involvement in business relationships, including in its operations and supply chain.

Attra recognizes that there are potential risks of involvement in modern slavery across its operations and supply chain, including through its various roles as:

Employer

Attra acknowledges that there may be a risk of exploited labour within its workforce. This risk tends to be higher in relation to low-skilled, indirect employment arrangements and in countries that are higher risk for modern slavery.

Attra is involved in IT services for its customers and employs highly skilled employees. Attra's semi-skilled employees like drivers are paid at or above industry compensation levels and access the same benefits as its skilled employees.

Attra does contract in a range of services. Modern slavery risks associated with these contracts are considered within its role as a purchaser of goods and services, below.

Purchaser of goods and services.

There is a risk that Attra could be involved in modern slavery if it is present in its supply chain. Attra's level of involvement may be influenced by sourcing practices, engaging in one-off purchases and/or the use of non-contracted suppliers. Attra also recognises that the potential for risks in its supply chain may be higher where it procures goods and services that are manufactured in, or use raw materials sourced from, industries and/or countries that are at a higher risk for modern slavery.

Through analysis of its supply chain Attra has identified the following higher risk categories of purchasing, regarding modern slavery risk:

- Labour hire including individual contractor
- IT Hardware
- Cleaning and housekeeping services
- Security services
- Food & beverage and hospitality

Attra’s supplier code of conduct and master services agreement include modern slavery clauses. Attra has reinforced its internal audit processes during this reporting period to ensure that practices by these outsourced contractors are compliant.

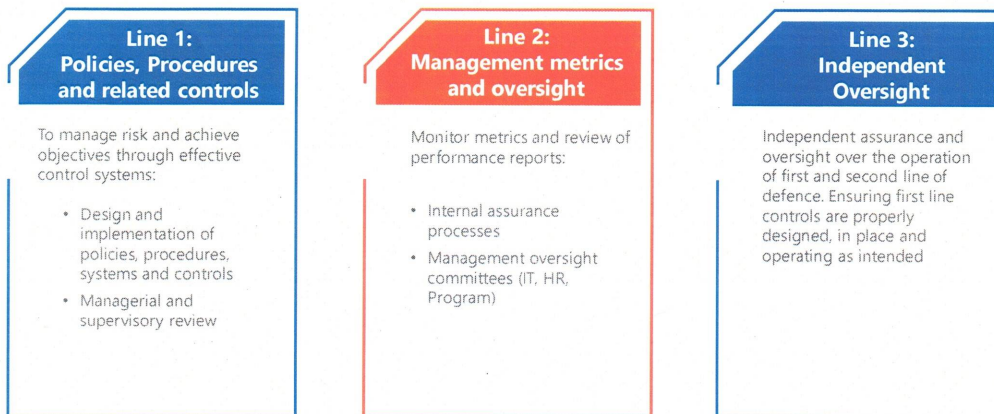
The operations of Attra’s overall Defence model against enterprise level risks (including Modern Slavery) is outlined below. Defence elements that have effect in limiting exposure to identified Modern Slavery risks are also outlined below.

Overview of Attra’s Defence Model

Attra has a robust Enterprise Risk Management framework implementation. Under the governance of the Audit and Risk Committee (ARC) of the Board, risks at an enterprise level are tracked and addressed in a systemic fashion. The risks at the enterprise level are reviewed annually and the work plan for the ARC is prepared based on the outcomes of this review..

Attra’s Enterprise Risk Management framework incorporates the three lines of defence model as depicted below.

Overview of Lines of Defense



Defences in Attra’s Operations

Attra’s Code of Business Ethics and Conduct (COBEC) brings together various policies and practices such as harassment in the workplace, anti-bribery, anti-corruption, and whistle-blower protection. The COBEC policy provides decision making guidance to Attra’s workforce, addressing relevant challenges that may arise in day-to-day operations and interactions. Mandatory annual trainings include training on COBEC for Attra’s workforce.

Attra has zero tolerance for unethical behaviours and associated regulatory violations and has a whistle-blower policy to provide a mechanism for employees and suppliers to report any such violations. The policy covers reporting of the following incidents:

- Abuse of authority
- Financial irregularities, including fraud, or suspected fraud
- Leakage of information including misappropriation of confidential / propriety information
- Illegal commission or kickbacks
- Falsification of documents/data/records
- Conflict of interest
- Misuse/misappropriation/ wastage of Company assets/funds
- Discrimination at workplace
- Workplace harassment
- Sexual harassment
- Human rights violation including modern slavery
- Bribery & corruption
- Violation of Company's policies, practices and rules, including the Code of Ethics and Business Conduct
- Breach of contracts
- Negligence causing substantial and specific danger to public health and safety
- Criminal offences
- Violation of applicable laws/regulations
- Any other unethical, biased, favoured or imprudent events

Attra continues to evolve its human rights related policies as it periodically reviews and matures its practices across a range of areas encompassed by Attra's corporate social responsibility program.

Defences in Attra's Supply Chain

Attra's Supplier Code of Conduct requires its suppliers to refrain from unethical practices including modern slavery. This code of conduct is part of Attra's supplier Master Services Agreement. Suppliers also sign an annual declaration to commit adherence to the code of conduct.

As a part of the supplier governance process, Attra performs an annual risk assessment of its suppliers across a range of areas, including information security, privacy, business continuity and modern slavery. Governance of the supplier management function is provided through the Supplier Governance Council (comprising of the CFO, Head of Operation, Head of IT, Head of Information Security, Head of Enterprise Risk Management) that reports to the Audit and Risk Committee of the Board.

The whistle-blower platform is also available to Attra's suppliers for reporting any irregularities and unethical behaviour. Any reported suspected violations will be investigated by the integrity committee, which comprises the Chairman of the Board, Chief Executive Officer, and a member of the Senior Management Team.

Conclusion

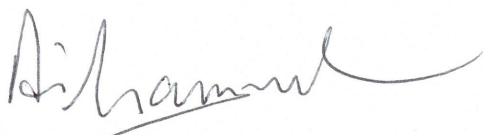
Attra addresses the risk of modern slavery and compliance with modern slavery laws through the Audit and Risk Committee (ARC) of the Board of Attra Pty Limited. All the subsidiary entities of Attra Pty Limited follow the policies and principles as set by the ARC.

In summary:

1. Attra has established policies and procedures within its operations, including its vendor management function that guide its employees and vendors behaviours and seek to address modern slavery risks.
2. Attra management maintains oversight of the operations of its policies and procedures through its internal governance processes, including its supplier governance council.
3. The performance of the risk management function is ultimately governed by the Audit and Risk Committee of the Attra Board, which oversees the performance of managements risk management practices, including the periodic scoping and delivery of independent assurance over the operation of policies and procedures in areas of prioritized risk, including Modern Slavery.
4. This is a combined statement prepared by consulting all the entities Attra owns. Attra does have large operations in India. Attra has ensured that all processes and practices are consistent across its entities.

This statement was approved by the Board of Attra Pty Limited on 28th of September 2021.

For and on behalf of Attra Pty Limited

A handwritten signature in black ink, appearing to read "Niranjana Anil Gammampila". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Niranjana Anil Gammampila

Chairperson of the Board