

MODERN SLAVERY STATEMENT

Centrepont Alliance Limited
(ABN 72 052 507 507)

25 November 2021



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1. INTRODUCTION

This is the second Modern Slavery Statement (**Statement**) of Centrepoint Alliance Limited ABN 72 052 507 507 (**Centrepoint Alliance or the Company**) and has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (the **Act**).

Centrepoint Alliance is committed to ensuring we have effective policies and procedures in place to minimise the risk of modern slavery occurring within our business operations and supply chains. Centrepoint Alliance has a strong commitment to governance processes, risk management, corporate culture, safety and compliance. These underpin the Company's commitment to a strong ethical and responsible approach to the conduct of our business operations.

This Statement sets out the actions that Centrepoint Alliance has taken to understand the potential modern slavery risks related to its business, and the steps it has implemented in the financial year ended 30 June 2021 (**Reporting Period**) to identify and prevent modern slavery in its supply chain.

2. CENTREPOINT ALLIANCE'S BUSINESS

The Centrepoint Alliance Group

Centrepoint Alliance and its controlled entities (the **Centrepoint Alliance Group**) operates in the financial services industry in Australia and provides a range of financial advice and licensee support services (including licensing, systems, compliance, training and technical advice) and investment solutions to financial advisers, accountants and their clients across Australia, as well as mortgage aggregation services to mortgage brokers. I

The Centrepoint Alliance Group holds five Australian Financial Services licences and two Australian credit licences and is the Responsible Entity for an IDPS-like scheme.

As at 30 June 2021, the Centrepoint Alliance Group provided technical, compliance and business management support services to approximately 315 financial advisers under its own licences and provided services to over 149 self-licensed financial practices. The Centrepoint Alliance Group consists of a number of entities in the areas of Licensee & Advice Services, Funds Management & Administration, Corporate and Technology.

To complement the Company's retuned business model Centrepoint Alliance acquired ClearView Advice in early FY22 to build our combined group into a market-leading advice service business. The ClearView Advice business included three entities, ClearView Financial Advice Pty Ltd, Matrix Planning Solutions Limited and LaVista Licensee Solutions Pty Ltd.

The below table includes all entities that are 100% owned by Centrepoint Alliance.

Name	Principal Activity
Licensee and Advice Services	
Centrepoint Alliance Lending Pty Ltd	Mortgage broker/aggregator
Alliance Wealth Pty Ltd	Financial Advice
Professional Investment Services Pty Ltd	Financial advice
Associated Advisory Practices Pty Ltd	Support services AFSL licensee

Name	Principal Activity
Xseedwealth Pty Ltd	Salaried advice
Funds Management and Administration	
Investment Diversity Pty Ltd	Packages investment platforms
Ventura Investment Management Limited	Packages managed funds
Corporate and Technology	
Centrepoint Alliance Services Pty Ltd	Trustee- employee share plan
Centrepoint Services Pty Ltd	Service company
Centrepoint Wealth Pty Ltd	Holding company
Presidium Research and Investment Management Pty Ltd	Dormant
Professional Accountants Pty Ltd	Loans to advisers
Enzumo Corporation Pty Ltd	Service company
Enzumo Consulting Pty Ltd	Consulting services

During the Reporting Period, the Centrepoint Alliance Group engaged approximately 260 suppliers. Centrepoint Alliance aims to establish a relationship of trust and integrity with all its suppliers, which is built upon mutually beneficial factors.

Centrepoint Alliance's Modern Slavery Governance Framework

The Company's purpose is to ensure our authorised representatives and licensees provide the best financial advice and financial services to the Australian community. Our values and expectations are reinforced across the Company through various communication channels, policies and training.

The Centrepoint Alliance Board of Directors is accountable for the Centrepoint Alliance Group's audit risk and compliance framework. The Company's internal Modern Slavery Working Group reports to the Board through the Compliance Committee and the Group Audit, Risk and Compliance Committee.

3. RISKS OF MODERN SLAVERY IN CENTREPOINT ALLIANCE'S OPERATIONS AND SUPPLY CHAINS

Centrepoint Alliance operates in the regulated Australian Financial Services environment, and within a highly regulated labour market with award safeguards for employees in most industries, with the risk of modern slavery in our operations on-shore being assessed as being low.

Centrepoint Alliance recognises that as a responsible company we must regularly assess our processes and identify any potential risk areas.

Accordingly, the following potential risks in our operations and supply chain have been identified, although they are considered very low risk:

- Centrepont Alliance may be at risk of involvement in modern slavery because some work (paraplanning) may be performed remotely or offshore;
- Contractors or our advisers may use uneducated or foreign workers, (example cleaners at leased premises); or
- Suppliers may provide services from offshore locations where Centrepont Alliance has limited direct visibility as to operational standards.

Centrepont Alliance risk assessment

The Centrepont Alliance Modern Slavery Working Group has assessed the modern slavery risk for each supply chain, at a certain spend level. The methodology is based on value of spend, geographic risk, services/product risk, sector risk and entity risk.

Due diligence has been performed on the relevant parties, with a questionnaire being circulated to those identified parties.

In addition, Centrepont Alliance undertakes periodic reviews of advisers to obtain various assurances from advisers including their employment practices.

Centrepont Alliance will not support advisers, suppliers or contractors where we become aware, or where we have reasonable grounds to believe that slavery or human trafficking are taking place in their own businesses or their supply chain.

Centrepont Alliance has made an overall assessment that its operations and suppliers present a low risk of modern slavery. Centrepont Alliance notes that many of its suppliers (including many of its largest) are in the financial services industry. In Australia, Centrepont Alliance understands this industry is considered to have a lower risk for prevalence of modern slavery.

Of Centrepont Alliance's top suppliers the biggest risk remains with a single supplier who provides paraplanning services using contractors based in the Philippines. The Philippines has a medium to high prevalence of modern slavery according to the Global Slavery Index. However, the Global Slavery Index ranks the government response in the Philippines to be high

4. POLICIES AND GOVERNANCE

Centrepont Alliance's approach to modern slavery is a company-wide approach. Its governance structure oversees the management of modern slavery risks.

Centrepont Alliance has recently updated the following policies which assist in identifying and preventing modern slavery in its operations:

- **Whistleblower Protection Policy** – Centrepont Alliance encourages all employees, customers and suppliers to report any suspicion of modern slavery without fear of retaliation. Centrepont Alliance ensures a confidential process to protect the identity of whistleblowers.
- **Code of Conduct** – Centrepont Alliance's code of conduct encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. Centrepont Alliance strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

5. AWARENESS AND TRAINING

Centrepont Alliance has raised awareness of modern slavery issues by undertaking annual training with its staff to maintain a focus specifically on modern slavery. The training included information regarding:

- What is modern slavery;
- How we can identify modern slavery; and
- What is Centrepont Alliance doing to combat modern slavery.

6. HOW CENTREPOINT ALLIANCE IS PERFORMING AND NEXT PHASE

In its second Reporting Period, the risk of modern slavery in Centrepont Alliance's operations and supply chain, has been assessed as being low.

During the next reporting period Centrepont Alliance will further review our practices with a commitment to:

- developing further policies and procedures that strengthen our commitment to mitigating modern slavery in our supply chains, where possible;
- continue our due diligence to identify material modern slavery risks in our operations and supply chains;
- where possible integrate modern slavery requirements (for example evaluations, questionnaires) into procurement and review processes for suppliers and contractors; and
- continue to develop training for engagement of staff on the issue of modern slavery.

7. PROCESS OF CONSULTATION

The Centrepont Alliance Board of Directors is the principal governing body of the Centrepont Alliance Group.

All subsidiaries reporting into the Centrepont Alliance Group operate under a common and consistent governance framework to build expectations, raise awareness and approach in assessing and addressing modern slavery risks in its operations and supply chain.

8. OTHER RELEVANT INFORMATION

This statement covers the Reporting Period 1 July 2020 to 30 June 2021 and has been approved by the Board of Directors of Centrepont Alliance Limited by circular resolution on 25 November 2021.



John Shuttleworth
Chief Executive Officer

25 November 2021

Modern Slavery Reporting Criteria

Mandatory Criteria (section 16 of the Act)	Relevant section in Statement
The reporting entity	Section 1 - Introduction
Structure, operations and supply chains	Section 2 – Centrepoint Alliance's Business
Risks of modern slavery practices in our operations and supply chain and any controlled entities	Section 3 - Risks of Modern Slavery in Centrepoint Alliance's Operations and Supply Chains
Actions taken to assess and address those risks, including modern slavery due diligence and remediation processes	Section 3 - Risks of Modern Slavery in Centrepoint Alliance's Operations and Supply Chains
How the effectiveness of actions taken were assessed	Section 3 - Risks of Modern Slavery in Centrepoint Alliance's Operations and Supply Chains
The process of consultation with owned and/or controlled entities	Section 7 - Process of Consultation
Any other relevant information	Section 8 - Other Relevant Information