

Modern Slavery and Human Trafficking Statement

Pursuant to the Australian Government Modern Slavery Act 2018



Melbourne | Australia

Ingenuous' mission is to empower its clients to detect, tackle and prevent financial crimes in the daily running of their businesses. We strive to deliver an innovative product, a high level of customer service, and we aim to be a company that listens to its clients and continuously improve. We can only achieve that mission by continuously investing in our people and in our ongoing research and development, by making ethical business decisions, and by acting with the highest level of integrity.

Ingenuous takes its corporate social responsibilities seriously. We want our clients to think of Ingenuous as a trusted business partner.

This statement describes the policies of Ingenuous in relation to the prevention of modern slavery and human trafficking in our business and in our supply chain.

Policies in relation to modern slavery

Our code of conduct specifies that we expect our management, our employees, our suppliers and our suppliers' employees, agents and subcontractors to respect labour rights. This code of conduct, combined with our due diligence efforts, provide the key mechanism used to prevent and mitigate risks of modern slavery and human trafficking occurring within our organisation and in our supply chain. Specifically, we and our suppliers are required to:

1. Commit to a workforce and workplace free of harassment and unlawful discrimination. We recognise and respect cultural differences and do not engage in discrimination in hiring, compensation, access to training, promotion, termination, and/or retirement based on race, colour, sex, national origin, religion, age, disability, gender identity or

- expression, marital status, pregnancy, sexual orientation, political affiliation, union membership, or veteran status.
2. Use only voluntary labour. Support for any form of human trafficking or involuntary labour is prohibited.
3. Ensure employee access to work-related documents. Employers are prohibited from requiring employees to hold employee identity or immigration papers (including but not limited to passports or work permits), or destroying, concealing, confiscating or otherwise denying an employee's access to such documents. Employees must be free to resign from their employment in accordance with local and national laws or regulations without unlawful penalty.
4. Comply with all local and national minimum working age laws or regulations and not use child labour (unless for the purposes of providing work experience/industry placement as part of a secondary or tertiary education program). Employers cannot employ anyone under the age of 15, under the age for completing compulsory education, or under the legal minimum working age for employment - whichever is higher. Employees under the age of 18 cannot perform hazardous work and may be restricted from night work, with consideration given to educational needs.
5. Not engage in physical discipline or abuse. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment, and verbal abuse or other forms of intimidation are prohibited.
6. Pay applicable legal wages under humane conditions. All employees must be provided with clear and understandable written information about their employment conditions in a language understood by the

worker with respect to wages, benefits, location of work, living conditions, housing and associated costs, including any costs charged to the employee and, if applicable, the hazardous nature of any work before they enter employment and as needed throughout their term of employment. Deductions from wages as a disciplinary measure are not be permitted. All disciplinary measures must be recorded. Wages and benefits paid for a standard working week must meet local and national legal standards.

7. Not require employees to regularly work more than the maximum hours of daily labour set by local and national laws or regulations. Employers must ensure any offer of overtime is voluntary and paid in accordance with local and national laws or regulations and a prior agreement between the employer and the employee. A working week should not be more than 60 hours, including any overtime, except in an emergency or unusual situation. Employees should be allowed at least one day off per seven-day week.
8. Keep employee records in accordance with local and national laws or regulations and provide in a timely manner, via pay slip or similar documentation, the basis on which employees are paid.
9. Respect employees' rights to freedom of association and collective bargaining in accordance with legal requirements. As noted above, we require that suppliers not engage in discrimination in hiring, compensation, access to training, promotion, termination, and/or retirement based on union membership.

Additional due diligence policies

We adhere to a due diligence process that identifies, monitors and mitigates the risk of human trafficking in our supply chains. We only work with reputable suppliers after undergoing a detailed evaluation of a number of potential suppliers who can provide the product and/or service we need.

1. As part of Ingenuous' induction and regular training for management and employees, everyone receives education regarding the risks and issues around human trafficking.
2. All suppliers and partners are reviewed internally by Ingenuous on an annual basis, to ensure the level of integrity in our dealings with that supplier or partner is at least equal to our own.
3. We provide a confidential grievance reporting mechanism for our employees and other stakeholders who may be impacted by our operations. Our policy covers how concerns can be confidentially submitted.

This statement was approved and endorsed by the board of Ingenuous on 3 May 2021.



Clint Mills
Managing Director