

Modern Slavery Statement 2021

InfoTrack Pty Ltd (InfoTrack) acknowledges that modern slavery remains a prevalent issue in the global community and is committed to maintaining ethical standards of conduct in our business activities and preventing acts of modern slavery from taking place within our supply chain.

This statement sets out our approach to preventing modern slavery in our workforce and supply chain.

❖ Our Organisation

InfoTrack delivers legal technology solutions to the legal, finance and conveyancing industries. We have over 300 employees across Australia with offices located in Sydney, Brisbane and Melbourne.

Our supply chain is relatively simple. We primarily source data directly from Australian Government agencies and other trusted third-party data providers to create aggregated reports and other products for our clients. To support our day-to-day operations, we also work with local suppliers to acquire office supplies, IT infrastructure, and other support services.

For any outsourced support services, we ensure that modern slavery provisions are included and agreed to in all relevant supplier contracts.

All suppliers are assessed based on merit, quality of goods and services and commitment to ethical work practices.

❖ Policies

To combat forms of modern slavery we have implemented policies to be relevant to this area, including our Recruitment Policy, Whistle-blower Policy, and Code of Conduct. These policies have been developed by key stakeholders in the business, approved by our board and published on our company intranet site.

In particular, our Whistle-blower policy has been designed to support a culture of corporate compliance and ethical behaviour by:

- encouraging employees to raise any concerns and report instances of Reportable Conduct where there are reasonable grounds to support such action, without fear of intimidation, disadvantage or reprisal;
- providing mechanisms for the reporting and investigation of reported matters;
- outlining the measures in place to protect a whistle-blower; and
- outlining the additional procedures and protections that apply to whistle-blowers under the Corporations Act 2001 (Cth) in relation to the reporting of possible breaches of the Corporations legislation.

Our internal policies are reviewed and updated from time to time in accordance with evolving industry practices and in response to changes in legislation.

❖ Due diligence

To identify risks of modern slavery we have drafted due diligence procedures to assess our business-to-business suppliers and recruitment activities, which we will update from time to time.

These procedures will include:

- Conducting a preliminary assessment of suppliers based on geographical location, the product or services offered, commitment to combat modern slavery and social and environmental sustainability performance.
- Adoption of a Supplier Code of Conduct which sets out standards for our suppliers to adhere to with respect to human rights, workplace rights, and anti-bribery and corruption standards.
- Implementing training on modern slavery for human resources and personnel involved in supplier procurement and management.
- Imposing contractual obligations on our Suppliers requiring compliance with our Supplier Code of Conduct, and our right to audit and assess supplier compliance.

❖ Evaluation of effectiveness

In order to determine the effectiveness of the controls to mitigate exposure to modern slavery, we will conduct an annual supplier review to assess third party suppliers on their compliance with our Supplier Code of Conduct and any relevant corporate social responsibilities. We intend on carrying out these assessments through questionnaires, risk assessments and interviews. Suppliers who are found to be lacking in these criteria will be removed as an approved supplier.

Due to the impact of COVID-19 during the 2020-2021 reporting period, the implementation of our planned modern slavery regime, as described above, was temporarily delayed. Planned activities such as staff training and supplier assessments were not able to occur due to factors such as significant staffing changes and the requirement for the majority of InfoTrack staff to work remotely, often at reduced hours, which limited the capacity of the business to assess modern slavery risks during this time.

InfoTrack is aware that the impact of COVID-19 has increased the risks of modern slavery to many businesses on a global scale. Despite challenges faced within the previous reporting period, we remain committed to our anti-slavery goals including full implementation of our modern slavery regime during the current 2021-2022 reporting period, in order to identify and address any instances of modern slavery within our supply chain.

This Modern Slavery Statement, developed in December 2021, is made pursuant to the Modern Slavery Act 2018 and was formally approved by the Board of Directors of InfoTrack Pty Limited, at its meeting on 29 March 2022.

A handwritten signature in black ink, appearing to read "Stephen Wood". The signature is written in a cursive style and is positioned above a horizontal line.

Stephen Wood

Director and Chairman of the Board of InfoTrack Pty Limited

29 March 2022