



Empired Limited ACN 090 503 843

Modern Slavery Statement FY 2020

About us

Empired Limited is an international IT Services Provider with a broad range of capabilities and a reputation for delivering enterprise class IT services and solutions. Established in 1999, Empired is a publicly listed company (ASX: EPD) formed in Western Australia. With a team of 1,000 people located across Australia, New Zealand and USA, Empired provides business technology solutions to both government and private sectors. We work with clients to deliver technological solutions to meet their business requirements. The business operates as two segments:

- Australia
- New Zealand – which includes USA

Our Governance Framework

Empired's Code of Conduct, core values and its Ethical Guidelines set the direction and behavioural standards for all employees (including our contractors and directors) who work for or on behalf of Empired. This is the driver of Empired employees maintaining an ethical and compliant approach to everything that we do.

Empired's core values include:



YOU CAN BELIEVE WHAT WE SAY

We deal with tricky issues head on and with honesty, and are accountable for our decisions and actions.



WE EARN OUR EXPERT STATUS

We naturally engender trust, as our integrity, ethics and values are steadfast and constant.



WE'RE PASSIONATE BECAUSE IT'S PERSONAL

We want to be the very best at what we do, getting there through personal drive, tenacity and adaptability.



WE UNITE AS ONE TEAM

We are patient, empathic and operate well in a group, and are good communicators and listeners.



IT FEELS GOOD TO BE OUR CLIENT

We act with customers and partners in mind, solving problems for the good of all.

Empired's Ethical Guidelines are also supported by its policies in relation to Diversity and Equal Opportunity, Bullying and Harassment, Remuneration, Drugs and Alcohol and also ensuring that its employees do not engage in misconduct. Empired also treat our clients, partners and suppliers with the same respect and courtesy as we extend to members of our team. We communicate with our clients, partners and suppliers with fairness, equality and honesty and respect the confidentiality of information to which we are privy. Our Ethical Guidelines also outlines various channels on how to raise concerns that are not in according to Empired's values, which also includes its Whistleblower policy.

Empired's board of directors (Board) is also responsible for the overall corporate governance of Empired and recognises the need for the highest standards of ethical behaviour and accountability. It is committed to administering its corporate governance structures to promote integrity and responsible decision making. Empired's approach to corporate governance is explained more fully in the Corporate Governance Statement as at 17 August 2020 available from www.empired.com.

Our operations and supply chain

For this statement Empired has focused and assessed the potential risk to people than risk to its business entities. Empired conducted a review of its potential risk of modern slavery practices in accordance with the Australian Government's Department of Home Affairs draft guidance document (2018).

In its review, Empired took into consideration factors such as industry, types of products and services and geographic locations. As an IT Services Provider operating predominantly in Australia and New Zealand, the risk in modern slavery in its operational activities undertaken directly by Empired employees is low.

In Empired's assessment of supplier engagement activities, majority of Empired's suppliers are based in Australia. However, Empired acknowledges that through its supply chain, it can be indirectly exposed to the risk of modern slavery and human trafficking regardless of location. Empired does expect its suppliers to share the same stance as Empired in its modern slavery practice and manage their business and supply chain in a manner that respects human rights.

Empired's risk management and due diligence process

Our workforce

Empired has a diverse workforce and employs people with varied skills with backgrounds in technology to sales. Operating in three different countries, Empired ensures that its employees are legally entitled to work and complies with all local laws, including providing employees with appropriate employment conditions such as hours of work, fair remuneration and wages and access to employment benefits.

Supplier Risk

Empired expressly requires that our subcontractors and partners are required to comply with the applicable legislation relating to modern slavery requirements. Empired does expect our subcontractors to monitor their own compliance with the modern slavery requirements and to be transparent with Empired if there has been a breach of its modern slavery obligations. Empired's approach on assessing the risk is based on the category of the goods or services provided and the country of the supply. There are contractual obligations on its Subcontractors to allow Empired to have the right to audit its records to ensure compliance. Empired plans to enhance its due diligence process to assist in identifying risks in areas where Empired could be exposed to modern slavery or human trafficking concerns.

Grievance and feedback mechanism

Empired's Whistleblower Policy allows anyone to raise concerns in a confidential manner. This channel is also available for reporting modern slavery concerns, which will be investigated in accordance with the Whistleblower Policy.

In FY2020, Empired did not identify any instances of modern slavery or human trafficking associated directly with its operations and no modern slavery or human trafficking concerns were raised through its Whistleblower Policy.

Looking ahead

Over the next year, Empired aims to focus on the following:

- Review existing policies to include specific references to modern slavery;
- Roll out training to all procurement staff and recruitment for purchasing goods and services;
- Enhance due diligence processes for supplier selection and screening.

This Modern Slavery Statement has been approved by the Board of Directors on 20 November 2020.



David Hinton
Company Secretary