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# Modern Slavery Statement

2022

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## Introduction

#### About the statement

This statement is made as a submission under the Australian Modern Slavery Act 2018 by Orro Pty Ltd (ABN 72 111 999 663) of Level 11, 423 Pennant Hills Road, Pennant Hills, NSW 2120. This statement is made with respect to the financial year ending 30 June 2022 (the Reporting Period). A full list of controlled entities is listed on page 5.

This statement sets out the steps that we have taken to assess and address the risks of modern slavery practices taking place within our operations or our supply chains during the Reporting Period. In this Modern Slavery Statement, the terms "Orro", the "Company", "our business", "organisation", "we", "us", and "our" refer to Orro, except where the context otherwise requires.

Orro is a privately owned company, with an annual turnover of above AUD100 million and majority controlled by Liverpool Partners. To find out more about Orro, you can visit our website:

https://orro.group/





## Message from the CEO

Orro provides end-to-end enterprise support. Our platform-enabled secure networks and new generation digital infrastructure deliver the future now for our clients-transforming their business and bringing their people closer together. We want to ensure that as we deliver our services, no one is harmed in the process.

According to the latest Global Estimates of Modern Slavery, fifty million people were living in modern slavery in 2021. These estimates from the International Labour Organisation, Walk Free and the International Organisation for Migration indicate a rise in the number of modern slavery victims globally. We recognise the collective responsibility for businesses to understand and address their areas of impact to mitigate harm to people.

We are proud to launch our second annual statement detailing our approach to understanding and addressing our modern slavery risks. This is the first year we have met the threshold for mandatory reporting against the Commonwealth Modern Slavery Act (2018) ('the Act').

This statement was approved by the Board of Orro.

Signed

Rodd Cunico

CEO

In 2021, we took the initiative to produce a voluntary annual statement. It was important to us to start our Modern Slavery journey early, and this has prepared us well for writing our mandatory report. We are committed to continually improving and understanding our human rights impacts in our operations and supply chain.

Key progress made during the 2022 reporting year has included:

- Formalising a multi-year Modern Slavery Action Plan which outlines the steps we will take to address modern slavery.
- Delivering workshops to the business on our modern slavery risks, gaps, and the actions we will take to close these gaps.
- Updated our Whistleblower Policy.
- Undertaken efforts to benchmark remuneration globally.

We welcome updates to the Act to drive Australian business accountability for modern slavery in their business activities.

<sup>&</sup>lt;sup>1</sup> International Labour Organisation, '<u>50 million people worldwide in modern slavery</u>' 2022

## About Orro

Orro is a proudly Australian owned and operated platform-enabled secure network and digital infrastructure provider. We assist our clients in the end-to-end installation, maintenance, management and operation of their digital network services, cloud infrastructure services, cybersecurity services, and digital workspaces. Our staff are responsible for delivering technical expertise for our clients, procuring technology, connecting equipment where necessary and delivering technical services.

Orro is a privately owned enterprise, and our primary shareholder is Liverpool Partners (ABN 61 159 465 1903).

Orro has ownership of the entities listed below, which are considered voluntary reporting entities in this statement:

| COMPANY NAME                             | TYPE OF ENTITY                             | ACN / ABN                    |
|--|--|------------------------------|
| Orro Pty Ltd                             | Local Operating Entity                     | 111 999 663 / 72 111 999 663 |
| Comscentre Pty Ltd                       | Local Operating Entity                     | 104 092 364 / 76 104 092 364 |
| Comscentre (WA) Pty Ltd <sup>2</sup>     | Local Operating Entity                     | 626 372 834 / 97 626 372 834 |
| Cirrus HoldCo Pty Ltd                    | Holding Company                            | 632 826 030 / 96 832 826 030 |
| Orro HoldCo Pty Ltd                      | Holding Company                            | 653 127 514 / na             |
| Orro MidCo Pty Ltd                       | Holding Company                            | 653 129 830 / na             |
| Orro FinCo Pty Ltd                       | Local Operating Entity                     | 653 130 404 / na             |
| Cirrus MidCo Pty Ltd                     | Holding Company                            | 639 242 774 / 60 639 242 774 |
| Network Technology Capital Pty Ltd       | Local Operating Entity                     | 131 174 957 / 28 131 174 957 |
| e-Secure Pty Ltd                         | Local Operating Entity                     | 086 248 419 / 48 086 248 419 |
| InFrasecure Ltd. London, UK              | Fully owned subsidiary of e-Secure Pty Ltd | na                           |
| Orro Group Philippines Inc³              | Foreign Operating Entity                   | na                           |
| Orro Cloud Philippines Corp <sup>4</sup> | Foreign Operating Entity                   | na                           |
| RIOT Solutions Pty Ltd                   | Local Operating Entity                     | 606 466 102 / 73 606 466 102 |

In the financial year Orro has acquired two new businesses, RIOT Solutions in May of 2022, and e-Secure in September of 2021. RIOT Solutions is located in Brisbane, Australia and provides cyber security and technical consulting services. E-Secure is located in Sydney, Australia. E-Secure provides cyber security services.



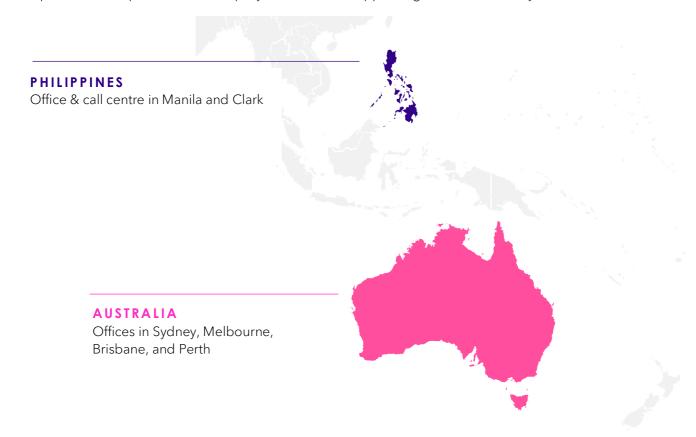
 $<sup>^{2}\,\</sup>mathrm{WA}$  Comscentre is now 100% owned by Orro

<sup>&</sup>lt;sup>3</sup> Formally Comscentre Philippines, company name has changed to Orro Group Philippines, Inc as of February 2022

<sup>&</sup>lt;sup>4</sup> Formally CTOC Services Inc, company name has changed to Orro Cloud Philippines Corp as of May 2022

### Our operations

Our operations focus on delivering technology and communications professional services. We have offices in Melbourne, Sydney, Brisbane, Perth and three international locations in Manila and Clark, Philippines. We also have direct employees working remotely from other Australian locations as well as in London, United Kingdom. Our operational footprint consists uniquely of offices that support digital service delivery.



As of 30th June 2022, we had 208 directly employed permanent workers and 31 temporary contract workers in Australia, three directly employed permanent workers in the UK, as well as 149 directly employed permanent workers in the Philippines. Our main business activities include the procurement of IT infrastructure and devices, the sale of IT products and services including technical support, and internal business support departments such as marketing, human resources, and finance.

Our operations in the Philippines function as a supplement to our Australian services, operating as a call centre to provide technical assistance for our clients. All our clients are based in Australia. All staff in our Philippines offices have technical expertise in technology solutions including a finance team to support this function.

We have continued to support our staff to work remotely during the ongoing COVID-19 pandemic.



400+

permanent staff across 8 office locations



500+

satisfied and secured clients



20+

years' experience, deploying and operating secure networks and digital infrastructure across Australia



20m+

Australians reliant on Orro Services



4 NOCs

in 2 countries



120,000+

devices under Orro management

## Our supply chains

Our supply chain profile has not significantly changed since our FY2021 statement.

#### **Products**

We procure several products to assist our day-to-day operations, in addition to the procurement of tools and equipment on behalf of our clients and customers. These products include office equipment, personal protective equipment, computer and hardware devices and other IT electronics. Additionally, we procure non-tangible products such as cloud-based subscriptions, security software and other software licenses and subscriptions. The products sourced for distribution and installation with our clients include network equipment, computer and hardware devices and other hardware equipment.

#### **Services**

We outsource several services for suppliers, including cleaning, security, maintenance, labour hire, recruitment, courier and delivery, professional services, insurance, education, and training, B2B marketing and design, and travel services.

To ensure compliance with Australian, Philippines and UK labour legislation, we have contracted relevant human resources and legal responsibilities to employment relations and professional services partners. These arrangements enable compliance with industry award and Fair Work legislation for Australia as well as relevant legislation in the Philippines and the UK.

## Measuring the risks of modern slavery

Orro seeks to operate in a manner that respects the rights of all people who work for us, as well as those working in our supply chains or affected by our business. In our approach to identifying and addressing the risks of modern slavery, we have utilised the definitions published by the ILO and Commonwealth Guidance, alongside the Act.

We recognise that modern slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. We understand that modern slavery includes the following forms:

- Trafficking in persons
- Slavery
- Servitude
- The worst forms of child labour<sup>5</sup>

- Forced labour
- Forced marriage
- Debt bondage
- Deceptive recruitment for labour or services

We recognise that modern slavery occurs on a spectrum of human rights and labour abuses and is considered one of the gravest of human rights violations.

#### **LEARN MORE: WHERE DOES MODERN SLAVERY FIT**

Modern slavery happens at the most extreme end of a spectrum that ranges from decent work to serious criminal exploitation.

#### **MODERN SLAVERY**

Worker cannot refuse or cease work because of coercion, threats, or deception. Worker may also be deprived or personal freedom.

#### **DANGEROUS OR SUBSTANDARD WORKING CONDITIONS**

Worker can refuse or cease work but doing so may lead to detriment. Worker is not paid fairly and does not receive some or all entitlements. Worker may be required to work excessive hours.

Workplace is unsafe.

#### **DECENT WORK**

Workers' rights respected.

Worker free to refuse or cease work.

Worker paid fairly (at least the minimum wage).

Workplace is safe.

Source: Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.

<sup>&</sup>lt;sup>5</sup> Note this includes extreme forms of child labour which involve serious exploitation of children, including through enslavement or exposure to dangerous work that is mentally, morally, or physically harmful. Children are classified as any person under 18.

#### How we measure risk

Consistent with the definitions in the Act, our approach to modern slavery risk focuses on the risk of harm to people rather than risk to business, while noting that these can be linked.

We are guided by the UN Guiding Principles on Business and Human Rights, which outlines that a company's response to risks should be measured according to the impact of the human rights violation occurring. The guidance indicates that where a business may have directly caused or contributed to the violation, it must remedy the negative impacts directly or through collaboration; whereas if a company is directly linked to the violation, it may use appropriate leverage to ensure remedy is provided. These risks often intersect with one another as different risk and vulnerability factors go hand-in hand.

We are committed to providing and cooperating in remediation to remedy instance of harm to people that arise from our business activities and relationships.

In our FY2021 Risk Assessment we used evidence-based sources to assess product/service risk, industry risk, and geography risk where available to understand the modern slavery risks in our operations and supply chain.

#### Our risk assessment approach

Our Modern Slavery Risk Assessment provided a snapshot of the risks of modern slavery in Orro's own operations and supply chain, informed by inherent risk factors. The Gap Analysis was conducted to provide a snapshot of the suitability of Orro's existing processes and systems to address modern slavery. This work relied on a self-assessment questionnaire filled by Orro internal staff, a document review of supplier data and relevant internal policies, interviews, and workshops, culminating in the development and validation of the Action Plan.

The Risk Assessment included an assessment of our suppliers weighted to spend to understand supplier categories where we have the most risk exposure based on publicly available research and where we have the most leverage based on our spend. From this assessment, 'hardware - network equipment' and 'hardware - laptops' emerged as highrisk categories.

The assessment also included a saliency mapping of our commodities and services based on likelihood of occurring and severity. From this, we have deemed labour and services in the Philippines as one of our most salient risks to address first.

We continue to use the FY2021 Risk Assessment to inform our modern slavery approach, as we have deemed the results to be applicable to our procurement context in FY2022. Our understanding of risk is also informed by the following guidance and reports:

- Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities, ABF, 2019
- United Nations Guiding Principles on Business and Human Rights, 2011
- Modern Slavery Risks, Rights and Responsibilities A Guide for Companies and Investors, ACSI & KPMG, 2019
- Global Estimates of Modern Slavery, International Labour Organisation, 2017
- Global Slavery Index, Walk Free Foundation, 2017
- Research in 43 commodities worldwide, Verite 2017
- List of Goods Produced by Child Labor or Forced Labor, US Department of Labor ILAB, 2020
- Trafficking in Persons Report, US Department of State, 2021
- ITUC Global Rights Index, International Trade Union Confederation, 2021 and 2022

We reference other benchmarks such as the KnowTheChain<sup>6</sup> to understand better practice approaches and flag our own suppliers who may be ranked on these ratings to inform our modern slavery approach. We will review updates to this guidance document list when we refresh our risk assessment.

## Risks in our operations

The risks in our operations have not changed significantly since our previous voluntary statement. We operate primarily across the professional services industry.

We note that the majority of our workers are directly employed, and that our workforce consists of a low percentage of foreign or visa workers. We remain vigilant to ensure the rights of our workforce are respected in all our operating jurisdictions.

Our business values diversity and will continue our progress in increasing the diversity of our staff across a range of different social factors. As we improve diversity, we will maintain our awareness of different linked risk factors to minority groups and worker vulnerabilities.

Employees are required to read and agree to our Employee Handbook, which outlines the rules and regulations, policies and procedures related to employment at Orro. The Handbook includes information on work hours, leave, benefits, grievances, and appropriate workplace behaviour expectations.

A key consideration regarding the modern slavery risk in our own operations is that of geographic risk. Our understanding of the geographic risk of our operations is primarily informed by the Global Slavery Index (GSI) by the Minderoo Foundation and International Trade Union Confederation (ITUC) Global Rights Index. The Global Slavery Index vulnerability score indicates the presence of systemic, individual, and environmental factors that precipitate modern slavery, while the ITUC focuses on the degree of respect for workers' rights. Asia-Pacific is ranked as the second worst region in the world for workers' rights, and the Asia-Pacific score on the ITUC Global Rights Index has worsened in 2022. We have noted that this is a factor in our operational risk profile.

<sup>&</sup>lt;sup>6</sup> KnowTheChain is an independent benchmark released biennially, scoring 49 major ICT companies against human rights performance indicators.

The following table outlines relevant risks based on these considerations for our two main countries of operation, noting that actions to mitigate risk are provided in the next section:

| COUNTRY   | GSI VULNERABILITY7 | ITUC RATING8                     |
|---|--------------------|----------------------------------|
| Australia Our operations in Australia are conducted in the professional services industry, with very clear and direct oversight of our workers and the contracts, conditions, and allowances they have. Due to the low industry risks and our compliance with the requirements of workplace laws in Australia, we consider our operations in Australia as low risk.  Since our last statement, Australia's ITUC rating has worsened from a 3 to a 4. This is an important reminder to be vigilant about the likelihood of modern slavery in the Australian context. | 4.27               | 4: systemic violations of rights |
| Philippines  The Philippines continues to be ranked by the ITUC Global Rights Index as one of the world's ten worst countries for workers. While we have direct oversight of the contractual arrangements with our staff in the Philippines, we recognise operating outside of Australia carries higher risks.  Orro has Australian oversight of our Philippines operations, including members of the Orro board acting as directors of the employing entity.   | 60.24              | 5: No guarantee<br>of rights     |

<sup>&</sup>lt;sup>7</sup> The GSI vulnerability score indicates the presence of systemic, individual, and environmental factors that precipitate modern slavery, 1 being low vulnerability and 100 being the highest. The country given the highest vulnerability rating is the Central African Republic at a score of 100.

<sup>&</sup>lt;sup>8</sup> The ITUC rating range from 1-5+ based on the degree of respect for workers' rights, 1 being the best and 5+ being the worst rating.

<sup>&</sup>lt;sup>9</sup> ITUC Global Rights Index, International Trade Union Confederation, 2022

## Risks in our supply chains

As noted, we assess risk based on analysis of spend considering product/service risk, industry risk and geographic risk. Our most recent Risk Assessment was conducted in FY2021. We request further information from relevant high-risk suppliers on their supply chains and sourcing standards, as well as suppliers who have received negative reports in the media.

#### **Procurement of goods**

Based on the FY2021 Risk Assessment and the guidance documents referred to in the previous section (**'How we measure risk'**), we have outlined the following products as high risk, in order of spend:

- Hardware network equipment
- Hardware laptops and portable electronics
- Stationery
- Office equipment

Based on our risk assessment findings, IT continues to be an area of focus for Orro. Consumer electronic goods have been named one of the highest risk imports to Australia according to the Global Slavery Index due to forced labour risks in the source country and manufacturing process.<sup>10</sup>

Several factors feed into the above procurement risk categories:

#### Country of origin

We are aware that most consumer electronics are manufactured in Asia - from some countries identified as having a high inherent risk of modern slavery in electronics manufacturing. We are currently unable to trace country of origin but aim to improve our capacity to assess this risk in the future.

#### Raw materials

Certain raw materials used in electronic goods and componentry are manufactured using 'conflict minerals'.

Exploitative labour practices are documented as prevalent in the mining of these minerals, that may include the worst forms of child labour.

#### Other risks

The risk assessment performed in FY2021 picked up media allegations of suppliers associated with forced labour in the Xinjiang Uighur Autonomous Region of China.

We continue to monitor press regarding labour concerns and the responses of suppliers associated with the allegations.

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<sup>&</sup>lt;sup>10</sup> Walk Free Foundation<u>, 'Global Slavery Index'</u> 2018

#### Procurement of services

Based on the FY2021 Risk Assessment and the guidance documents referred to in the section **'How we measure risk',** we have outlined the following services as high-risk, in order of spend:

- Repairs and maintenance
- Industrial labour hire
- Cleaning services

These services have been outlined as higher risk as they often involve subcontracting arrangements that obscure responsibility and accountability, tend to be low-skilled work, and have inconsistent regulation in the labour service industry in both Australia and the Philippines.

#### Modern Slavery Gap Analysis, Risk Assessment and Action Plan

In FY2021, we commenced work with an external professional services company with human rights expertise to undertake a Modern Slavery Risk Assessment ('Risk Assessment') and Modern Slavery Gap Analysis ('Gap Analysis'). This work continues to inform our approach for FY22. The external analysis was conducted with input from representatives across the Orro business through direct consultation and key stakeholder workshops. Additional consultation and engagement took place in 2022.

#### Actions we are taking to address modern slavery risks



The external consultant delivered a workshop to key internal stakeholders on Orro's modern slavery obligations and the outcome of the Risk Assessment and Gap Analysis of our systems and processes to address modern slavery.

This work was finalised in FY2022, and we received formal approval from our board to implement our multi-year Modern Slavery Action Plan.

In FY2022, we have worked through our Year 1 actions to implement the foundational recommendations from the Risk Assessment and Gap Analysis.

#### These actions included:

- Formalising our Modern Slavery Action Plan
- Internally communicating our commitment to addressing modern slavery and continuous improvement
- Updating our grievance mechanism processes
- Understanding our global remuneration against the market

#### **Governance and policy commitments**

The Chief Executive Officer carries organisational responsibility for modern slavery; the Chief Operating Officer has responsibility for organisational implementation of actions in relation to modern slavery; and the Chief People Officer is responsible for the actions to support compliance with labour legislation in our Australian and international operations.



To support executive awareness all environmental, social, governance (ESG) areas, including modern slavery, are discussed with the Board formally on a quarterly basis. Additionally, we provide quarterly reports to Liverpool Partners on modern slavery and ESG actions.

We established a cross-functional Modern Slavery Working Group that meets throughout the year to support the achievement of the Action Plan and draft the Modern Slavery Statement. During the reporting period, the group met more than once a month.

We have created a knowledge repository in our team workspace, Confluence. The repository contains a section on modern slavery for our employees, including how responses to customers' enquiries on our modern slavery approach can be addressed.

We have reviewed and updated a selection of our internal policies. We have also updated our Employee Handbook for 2022 with our new and refreshed policies. At Orro, we also take a stand against family and domestic violence and are committed to providing assistance for employees experiencing this, as well as taking appropriate action when an employee is found to commit family and domestic violence. Our new Family and Domestic Violence Policy advises employees about their right to Family and Domestic Violence Leave and the procedures involved.



#### Whistleblower protections

In FY2022, we have refined our Whistleblower Policy based on better meeting changes in legislation utilising an external legal firm. In line with the Corporations Act 2001 (Cth), our revised Whistleblower Policy outlines who can make a disclosure, what a disclosure can include, and the process we take to investigate disclosures as well as what protections are available to disclosers.

Employees and other disclosers should be free to raise concerns without fear of retaliation. We will not tolerate victimisation and harassment of disclosers or suspected disclosers, detrimental treatment by any employee will be deemed a serious breach of our policies and may result in disciplinary action up to and including termination of employment.

We also communicate our grievance mechanisms processes to employees through the Employee Handbook, which all employees must read and acknowledge at the time of hire.

The handbook outlines protections for whistle-blowers raising serious concerns, including:

- Committing a criminal offence
- Failing to comply with a legal obligation
- Endangering the health and safety of an individual
- Concealing any information relating to the above.

We currently provide speak up information on our website including our contact details and an anonymous form report for team members, customers, and suppliers to raise concerns with us.

In FY2022, we updated our website to include an anonymous form for people to raise concerns.

We are researching third party service providers to facilitate easier external access to confidential reporting of concerns, provide support in understanding and documenting the grievance, and provide training to the Board and executives on their responsibilities and obligations.

#### Impact of COVID-19

We continue to support our staff working in Australia and the Philippines to work remotely in response to public health orders and COVID-19 related risks and moved to a full remote working model for the UK. We have minimised job-loss because of COVID-19 due to the nature of our business in IT solutions. Reduced in-person attendance has resulted in reduced procurement spend for higher-risk materials such as stationery and office consumables, which have risks of forced labour in the manufacturing sector.

COVID-19 has disrupted the availability of consumer electronics and components required for our operations and supply to our clients. Supply chain shortages meant we had to consider ordering via alternate partners to ensure customer continuity and service.

Travel restrictions prevented onsite due diligence and face-to-face conversations and reviews. Network-related setups, checks, reviews, and tests which required an engineer to be onsite had to be reviewed to ensure we were operating in line with state COVID regulations. We experienced challenges during customer and data centre site visits due to adherence to different policies, abnormal staff movements. Training and scheduling were also disrupted during this period, while other training was changed to virtual modes and recorded, giving staff flexibility on how to use their time.



#### Due diligence activity

When we procure new goods or services, we undertake to gain information on potential modern slavery risks, and seek informed advice where needed.

Orro is a member of Sedex. We are in the process of changing our membership name from 'Comcentre Networks' to 'Orro'. We are currently investigating Sedex's functions to support our Modern Slavery Action Plan.

We work to ensure that we are providing fair employment opportunities and remuneration. We recently completed an industry salary benchmarking exercise partnering with a global benchmarking company. This allowed us to use country specific data to benchmark each specific role in the organisation. The results of this assessment found that a majority of the organisation is paid within the industry benchmark range. Any anomalies were addressed immediately and out of cycle. In addition, we looked at gender parity and undertook work to minimise the gender pay gap. Implementation of the findings were completed in October 2022, and work commenced to build these market-aligned salary ranges into a career and job framework to support fair remuneration. Orro will continue to assess the benchmarking data to capture and measure any further market movement that will require immediate action.

We have identified equipment purchase as a high modern slavery risk area. This purchasing is consolidated around major global companies. We are aware of our leverage limitations with these suppliers. In future, we will pay attention to the reviewing of their practices against reputable benchmarks to understand their modern slavery risks and controls.

#### **Training**

As part of our Whistleblower Policy update, we will provide training to staff on whistleblowing concerns, the grievance process, and our obligations to respond to concerns.

As part of the development and implementation of our Action plan, we delivered workshops to the business on our modern slavery risks, gaps, and the actions we will take to close these gaps.

#### Charitable donations

During the FY2022 reporting period, Orro made \$169,000 worth of donations to The Generations Foundation - a children's education charity founded by Liverpool Partners. In addition, there is a further \$56,000 already allocated for support.

We recognise that providing support services for vulnerable children in geographic locations of high risks can be associated with adverse human rights risks to children, where appropriate standards and practices are not upheld. The Generations Foundation takes actions to ensure that best practice program partners are selected to provide the services to support children across these locations. We are aware that The Generations Foundation requires appropriate child protection and ethical performance standards from recipients of the funds.



#### Assessing the effectiveness of our actions

In the year, we have continued to establish frameworks for our approach to modern slavery as we make progress on our Action Plan. As we mature our approach, we will develop KPIs and targets to frame our due diligence activities.

#### **Partnerships**

We have an opportunity to engage our peers and share our modern slavery learnings to support the broader industry to identify and address modern slavery risks. We regularly engage our sister companies through Liverpool Partners. ESG representatives from Orro meet with ESG representatives from our sister companies quarterly to share learnings and best practice approaches to addressing modern slavery and broader ESG impact areas.

#### **Progress and commitments**

| PLANNED   | TASK   | STATUS      |
|-----------|--|-------------|
| FY2021-22 | Formalise 3 Year Modern Slavery Action Plan and gain commitment from executive leadership                      | Completed   |
| FY2022    | Communicate commitment to Modern Slavery Action Plan and continuous improvement to business internally         | Completed   |
| FY2022    | Workshop and training for key personnel in modern slavery risks, gaps, and Modern Slavery Action Plan targets  | Planned     |
| FY2022    | Explicitly mention modern slavery in grievance channel   | In Progress |
| FY2022    | Check availability of grievance to PH staff and contractors  | Planned     |
| FY2022    | Run due diligence checks for PH staff/ vulnerabilities   | Completed   |
| FY2022    | Disclose results of our Modern Slavery Gap Analysis and defined actions in our FY2022 statement                | Completed   |
| FY2022    | Speak up information on our website  | Completed   |
| FY2022    | Have easily accessible information for responses to customers regarding how Orro addresses Modern Slavery Risk | Completed   |
| FY2022    | Group-wide Code of Conduct, reflecting human rights and salient ESG considerations                             | In-progress |
| FY2023    | Leverage Sedex membership for risk identification  | Planned     |
| FY2023    | Third party service provider to facilitate confidential whistleblowing reporting                               | Planned     |
| FY2023    | Introduce Modern Slavery KPIs and company-wide training  | Planned     |



#### **Compulsory declaration**

#### Consultation

The preparation of this statement has been informed by actions implemented through the year by teams across Orro. The statement has been reviewed and signed off by the Modern Slavery Working Group, with final review and approval by the board and CEO.

#### Principle governing body approval

This Modern Slavery Statement was approved by our board, as the principal governing body of Orro on 20th December 2022.

#### Signature of Responsible Member

This modern slavery statement is signed by a responsible member of the Orro Board as defined by the Act<sup>11</sup>



<sup>11</sup> Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorized to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

