

October 2022

Modern Slavery Statement

Our Stance on Modern Slavery

Statement from the Managing Director

Spirit is committed to eradicating Modern Slavery & Human Trafficking in all its forms.

We aim to increase our engagement across our vendor partners to continuously ensure that we have a “slave-free” supply chain.

Our statement outlines our intention and commitment to the Modern Slavery Act 2018. It also describes the steps that we have taken to identify, manage and mitigate the specific risks of Modern Slavery & Human Trafficking in our operations and supply chains.

Julian Challingsworth
Managing Director
Spirit Technology Solutions Ltd

About Us

Spirit Technology Solutions Ltd (Spirit) builds secure modern workplaces for Australian businesses.

Cyber Security is at the heart of our business, in addition to Communication & Collaboration and Managed IT Services.

Intalock Technologies (ABN 68 143 449 067) and Nexgen Investment Group (606 251 503) are fully owned subsidiaries of Spirit Technology Solutions.

Our operations

Based in Melbourne, Spirit has offices in Sydney, Dubbo, Brisbane and the Gold Coast and employs 320 staff throughout Australia.

Our supply chains

The conduct, operations, and performance of Spirit's suppliers can have a significant impact on Spirit's own performance and reputation.

Spirit strives to work with suppliers that match our values and promote sustainable business practices, including those related to human rights.

Our supplier relationships cover the following sectors:

- Information, communications, and technology
- Professional services
- Property and utilities
- Marketing and promotional services
- Corporate services, such as office supplies, couriers.

Our Workplace

We are committed to complying with relevant local and national laws, community expectations and ethical standards related to modern slavery and human rights in respect to our employees, our customers, and our business operations.

As part of Spirit's commitment to ensuring that all employees are treated with equality and respect, we do not tolerate any form of discrimination or harassment and we strive to be an equal opportunity employer.

We are committed to building and maintaining a safe and inclusive workplace, ensuring our employment conditions adhere to legislation that outline minimum wages, appropriate hours of work and leave provisions, as well as the ability to sustain the health, safety and wellbeing of our employees, contractors, and visitors.

Our employees are encouraged to report genuine concerns about any conduct or activity they believe is unethical, illegal, fraudulent, undesirable, or corrupt and we offer a number of channels for them to do so.

We have a whistle blower and Anti-Bribery policies which readily available through our Learning Management System.

This development course reflects our commitment to develop a “speak up” culture, allow an “eligible whistle blower” to anonymously report and disclose improper conduct confidentially, and on reasonable grounds without the fear of reprisal or detrimental action.

Training and Communications

There are a significant number of compliance obligations that apply across our day-to-day activities at work, whether they are laws, regulations, code of conduct or ethical standards and we are committed to educating our employees about them.

Ensuring that our people have a good understanding of, and respect for human rights is important and Spirit enables this through training and awareness across our teams.

We have introduced modern slavery awareness training as part of our staff development programs for all staff, facilitated in our Learning Management System, and will continue to refine this over time.

Planning Ahead

Since launching our first Modern Slavery statement in 2021, Spirit has:

- ✓ Raised awareness of Modern Slavery & Human Trafficking by deployed training within our Learning Management System, which is now mandatory for all new Spirit employees.
- ✓ Undertaken visits, by the Chairman of Spirit Technology Solutions, to our operational centres outside of Australia to ensure appropriate workplace standards.
- ✓ Reviewed FY22 business activity with specific suppliers identified from a review in 2021, and this continues to indicate that we have little risk.
- ✓ Reviewed the Modern Slavery policies and practices of our major distributors, vendor, and recruitment partners.
- ✓ Created a Supplier Code of Conduct.

Spirit has an ongoing commitment to ensure compliance and anticipates further work to:

- Embed and uphold policies throughout our supply chain.
- Engage with the IT industry to consult and collaborate on Modern Slavery.
- Embed learning throughout our organisation to ensure a deep and continuous understanding across our employees.
- Constantly review best-practice and respond accordingly.

Consultation

We consulted the relevant companies we own and control in the development of this Statement.

Approval

The Statement was reviewed and recommended to the Board for approval by executive management. This Statement has been approved for release by the Spirit Board of Directors.



James Joughin
Chairman

30 April 2024