

Modern Slavery Act Statement

CountERPart Solutions specialises in implementing cloud software solutions. Operationally we provide consulting services to clients, assisting with cloud software implementation and management. In the supply chain we source cloud software from Oracle Australia and related services from technology providers and vendors locally and offshore.

We've considered risks of modern slavery practices in the operations and supply chains and concluded these do not include forced labour, human trafficking, and exploitative working conditions in the supply chains. We understand risks can arise from suppliers involved in the development, production, or maintenance of cloud software components and related services.

We regularly evaluate the supply chains to identify potential modern slavery risks by:

- conducting due diligence assessments on suppliers, including reviewing their labour and human rights practices.
- collaborating with industry partners and organisations to stay informed about best practices and emerging trends.

To develop this statement, we engaged in consultations with entities owned or controlled by the company. Sought input and feedback from relevant stakeholders, such as employees, suppliers, and industry experts. Utilised phone surveys, meetings, and other communication channels to gather insights, concerns, and suggestions and incorporated feedback received during the consultation process into the development of the modern slavery statement.

We therefore can state that CPS complies with the Modern Slavery Act 2018, however as part of its work with public sector has ensured conformance with this Act.

We have a zero-tolerance approach to modern slavery and all forms of discriminatory or exploitative behaviour and treatment, whether within our own business or that of those who supply us; this stance is made clear in all our policies and behaviours.

Our key policies and procedures, which outline the steps that we have taken to mitigate against the risks of modern slavery, are set out below. These are reviewed on a regular basis.

- Our Code of Conduct which sets out the conduct that we expect of our partners, employees, contractors and suppliers, expressly states that we will not tolerate slavery or human trafficking.
- Our Procurement Policy and Guidelines establishes a framework for assessing the social, environmental and ethical impacts of goods and services procured by Ashurst.
- Our Contracts Protocol and the Third-Party Risk Management Review requires due diligence on new vendors and ongoing monitoring and management of existing vendors to Ashurst.

- Our Anti-Money Laundering and Counter Terrorism Financing Policy which covers our compliance obligations with respect to suspected proceeds of crime including those derived from criminal activity such as modern slavery.
- Our Social Impact Responsibility Policy which sets out our approach to supporting anti-slavery and human trafficking initiatives.
- Our Equal Opportunities Policy outlines our commitment to being an equal opportunity employer and providing an inclusive working environment. All partners and staff are expected to act with integrity and honesty in a manner which not only is, but encourages, fairness, inclusivity and transparency.
- Our Domestic Violence Policy which sets out the firm's commitment in supporting employees who may be impacted or affected by domestic and family violence.
- Our Whistleblowing Protection Policy which allows staff to raise any concerns that they may have about any individuals or organisations that Ashurst interacts with, whether they be clients, suppliers or others.

We are committed to achieving the highest standards of ethical behaviour in the conduct of our business and activities worldwide. We support and respect the protection of internationally proclaimed human rights and endeavour to make sure that CPS is not complicit in human rights abuses.

To this end, we will not tolerate slavery or human trafficking or abusive or unfair treatment in any part of our own business or in any of our supply chains. We are generally, and through our policies and practices in relation to procurement, people and culture and corporate responsibility, committed to taking steps to ensure that slavery and human trafficking play no part in our own business or in our supply chains.

Approved by Counterpart Solutions Pty Ltd Board of Directors in May Board Meeting held on 18th May 2023

Signed by:
Director/CEO - Wayne Welcome



Signature

18th May 2023

Signed by:
Board Chairman - Mark Cooper



Signature

18th May 2023
