

**Constellation Software Australia Pty Ltd**  
**ACN 141 627 232**

Modern Slavery Statement  
Financial Year 2022

June 2023, Version 1

This statement provides information about Constellation Software Australia Pty Ltd ACN 141 627 232 (**CSA**) and its directly and indirectly owned or controlled subsidiary companies (together, **CSA Group**). CSA is a wholly owned subsidiary of Constellation Software Inc. (**CSI**), a Canadian public company listed on the Toronto Stock Exchange under the symbol “CSU”.

This statement sets out the plans and actions of the CSA Group to identify and mitigate modern slavery risks in its business and supply chain. This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) and relates to the financial year 1 January 2022 to 31 December 2022 (**Reporting Period**).

CSA Group is committed to treating all workers with respect and dignity, ensuring safe working conditions, sourcing responsibly and conducting transparent and ethical operations.

**1. Constellation Software**

- 1.1. CSI is an international provider of market-leading software and services to several industries, both in the public and private sectors. Its mission is to acquire, manage and build market-leading software businesses that develop specialised, mission-critical software solutions.
- 1.2. CSI was founded in 1995 to assemble a portfolio of vertical market software companies that have the potential to be leaders in their market. Since then, CSI has grown through a combination of acquisitions and organic growth and has established ownership of a group of companies with a customer base comprised of over 125,000 customers operating in over 100 countries around the World.
- 1.3. With its headquarters in Toronto, Canada, and offices in North America, Europe, Asia, Australia, South America and Africa, CSI has over 45,000 employees generating consolidated revenues exceeding US\$6.6 billion and is listed on the Toronto Stock Exchange with a market capitalisation in excess of CAD\$57 billion (as of 30 June 2023).
- 1.4. CSI seeks acquisition opportunities to add value to existing vertical markets. CSI’s mandate is to acquire, strengthen and grow software businesses in niche vertical markets. CSI seeks to build and acquire independently managed software companies, providing them with strategic guidance and financial security, enabling them to be leaders within their focused industries.
- 1.5. CSI’s decentralised business model offers vertical market software companies the ability to maintain their independence, which allows them to focus on the needs of customers and employees post-acquisition. CSI’s buy and perpetual hold acquisition philosophy provides a safe and permanent home for software businesses in a wide range of industries including Communications, Financial Services, Education and many more.
- 1.6. CSI and its group entities currently operate in over 130 vertical markets, in over 60 countries, and with over 600 distinct and independently managed businesses. These provide business enhancing solutions, with multiple brands within verticals, and run a decentralised business model.

**2. Constellation Software Australia Pty Ltd**

- 2.1. CSA is a financial holding company of CSI with direct or indirect ownership and/or control of approximately 100 companies (**CSA group companies**). CSA has its headquarters in Brisbane, Australia and a financial year

end of 31 December. During the Reporting Period, CSA group companies employed people across the globe including Australia, New Zealand, Africa, the United Kingdom, the Americas, Asia and the Middle East.

- 2.2. CSA is a reporting entity as defined in the Act. Individually some of the CSA group companies may also be reporting entities. This statement therefore is a joint statement between all CSA group companies that are also reporting entities.
- 2.3. CSA group companies take seriously their responsibility to identify and mitigate modern slavery risks.

### **3. CSA structure**

- 3.1. During the Reporting Period, management of CSA group companies was shared between several CSI operating groups. These operating groups have headquarters in Canada, the United States or Europe and their presence in Australia ranges from large to small.
- 3.2. The operations of CSA group companies are decentralised however certain processes and reporting obligations are managed centrally. CSA has a board of directors, comprising residents of Canada and Australia. Each CSA group company will have a management structure for daily operations.
- 3.3. As such a consultation process with the senior management of CSA group companies was undertaken to draft this statement. Policies and processes that are substantially similar have been identified in this statement. Relevant subject matter experts across the business operations have been consulted to ensure accurate inputs to, and understandings from, these investigations.

### **4. CSA operations**

- 4.1. CSA group companies sell software and services to several industries, both in the public and private sectors.
- 4.2. CSA group companies have operations around Australia, including most major cities.
- 4.3. CSA group companies deliver their software and services by grant of license, rights to use a service or through arrangements with third parties.
- 4.4. CSA group companies often rely on manufacturing partners to produce hardware-related components and hardware products.

### **5. CSA supply chains**

- 5.1. CSA group companies each manage their own supply chain relevant to delivery of their software, hardware and related services.
- 5.2. The operations of CSA group companies require suppliers such as professional service providers, maintenance service providers, software developers, goods manufacturers and other software and technology providers.
- 5.3. While often sourced from Australia, CSA group companies often have global supply chains. CSA group companies work closely with vendors to understand and evaluate their supply chain. Management of CSA group companies implement centralised and individual policies and procedures for oversight of these supply chains.
- 5.4. For the purpose of its assessment into modern slavery risks, CSA group companies identified their key suppliers by cost. Major supply chains include both local and international provision of:

- 5.4.1. Cloud infrastructure and hosting services;
- 5.4.2. Third party software and components;
- 5.4.3. Software development services;
- 5.4.4. Manufacture and delivery of hardware;
- 5.4.5. Business process outsourcing;
- 5.4.6. Consulting and professional advisory services; and
- 5.4.7. Call centre support.

## 6. Risk identification

- 6.1. CSA group companies conducted an assessment of modern slavery risks in their operations and supply chain during the Reporting Period in response to targeted questions distributed by each operating group. This diligence included review of existing operations, material supply chains and identity of suppliers to identify higher potential modern slavery risks.
- 6.2. Following assessment of their operations and supply chain, certain CSA group companies identified potential risks relating to modern slavery in their supply chain, but not causing any such risk in their operations. These potential risks include:
  - 6.2.1. maintaining relationships in countries with significantly different social, economic and political structures than Australia. This can include different employment laws and prevalence of temporary or seasonal workers; and
  - 6.2.2. the use of unskilled and temporary labour in the production of low value hardware or components.

## 7. Risk mitigation

- 7.1. CSA group companies have developed systems to mitigate risks of modern slavery in its operations and supply chain including:
  - 7.1.1. **Governance framework:** establishment of a governance framework which supports business ethics and responsible sourcing. This framework includes management and specialist oversight of operations, monitoring of legislative and regulatory requirements, review and consideration of recent trends, education on modern slavery risks within operations and to supply chain and maintaining a focus on continuous improvement of policies and processes;
  - 7.1.2. **Diligence:** ongoing due diligence through investigation, inspection and audit of any perceived higher risk of modern slavery practices. CSA group companies engage in an internal review process to confirm material supplier maturity, creditworthiness, reputation, cost of service delivery prior to engagement, review of modern slavery statements and supplier websites. Such diligence also extends to operations of each business unit;
  - 7.1.3. **Supplier engagement:** promoting direct relationships with suppliers to understand modern slavery risks including on premises tours, training, on site interviews, meetings with management, policy review and contract review. CSA group companies are committed to engaging with suppliers on modern slavery risks in downstream operations and supply chains;

- 7.1.4. **Supplier agreements:** review of existing supplier agreements to ensure terms support CSA's commitment to identifying, mitigating and remediating modern slavery risks. This may include a Supplier Code of Conduct and termination rights in the event of non-compliance with the Act.
- 7.1.5. **Education:** internal training in relation to supply chain management to raise awareness of modern slavery practises and processes to mitigate such risks;
- 7.1.6. **Internal reporting:** internal reporting and monitoring including escalation of material engagements for review.
- 7.1.7. **Whistleblower policy and program:** CSI has an established Whistleblower Policy and Program which is designed to operate in conjunction with its Code of Conduct. The policy explains how possible misconduct, including modern slavery practices, can be reported and how CSI will protect people who raise such concerns. CSI maintains a dedicated Whistleblower phone hotline and email address. The policy and the program are accessible to all staff.
- 7.1.8. **Geographic risks:** where higher risks are identified due to the country from which services are received, CSA group companies maintain an approvals procedure for engagement in these countries. This procedure ensures compliance with sanctions and trade control processes, as well as identifying and mitigating modern slavery risks before receiving such supply. Mitigation measures may include supplier diligence leveraging direct engagement to diligence downstream suppliers, publicly available reports and developing trusted local relationships with stakeholders.
- 7.1.9. **Employment risk:** CSA group companies ensure its employment processes are in accordance with Australian employment law and the National Employment Standards, as well as local equivalents for employment outside Australia. Standardised employee and contractor handbooks and codes of conduct continue to apply to mitigate risk when engaging with lower skilled workers. Due to its decentralised structure, CSA group companies are able to maintain close and collaborative relationships with their stakeholders including employees ensuring implementation of training and early identification of potential unethical conduct.

## 8. Remediation processes

- 8.1. During the Reporting Period, CSA did not identify any risks requiring additional remediation steps in its second Reporting Period nor identify any high risk suppliers in its supply chain. CSA has not received any reports of modern slavery issues in its operations or supply chain.
- 8.2. However, it recognises that ongoing risk assessment and mitigation is required, including engaging with downstream suppliers in their supply chain to identify any such risks. Where relevant, these matters will be investigated and reported in the next modern slavery statement along with any further remediation required.
- 8.3. Any such modern slavery risks identified will be addressed across relevant teams including legal, human resources, finance and information security. These matters will be escalated to senior management as required.

## 9. Effectiveness of actions

- 9.1. CSA has been committed to receiving and constructively addressing feedback from stakeholders including customers, suppliers and other stakeholders on modern slavery risks.
- 9.2. Diligence and supply chain mapping conducted in accordance with this statement are reviewed for their effectiveness as measures to mitigate the risks of modern slavery.

9.3. Other key indicators of the effectiveness for CSA group companies includes feedback from internal and external auditors of operations and supply chain management, as well as any feedback received through ongoing diligence or direct feedback.

9.4. CSA group companies continue to monitor key business indicators including financial stability, employee satisfaction or attrition and current litigation exposure. These indicators do not suggest concerns with modern slavery risks.

**10. Consultation**

10.1. CSA group companies were engaged in consultation on modern slavery risks through direct email communication from CSI operating groups. This consultation included sharing information about such practices and requesting information about identified risks and mitigation measures.

10.2. Given the decentralised structure of CSA group company operations, CSA group companies engaged in consultation with key stakeholders such as legal counsel, senior management and key finance managers for the purposes of conducting diligence, risk assessment and determining ongoing mitigation and remediation actions.

10.3. Feedback from CSA group companies in all operating groups was then aggregated for the purposes of this joint statement.

**11. Future actions**

11.1. CSA remains committed to identifying risks of modern slavery practices in its operations and supply chain and taking preventative steps against such risks.

This statement has been reviewed and approved by the governing body of CSA and is signed by director Jamal Baksh.



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Jamal Baksh  
Director  
Constellation Software Australia Pty Ltd  
30 June 2023