# MODERN SLAVERY STATEMENT
1 July 2020 – 30 June 2021

1. CONFIRMATION OF REPORTING ENTITY

This Modern Slavery Statement is made by CyberCX Holdings Pty Ltd (**CyberCX**) (ABN 90 629 361 806) for the 2020-21 reporting year in compliance with the Modern Slavery Act 2018 (Cth) (the **Act**).

Headquartered in Melbourne, Australia, the CyberCX group consists of over 20 wholly owned, related bodies corporate across Australia, New Zealand, the United Kingdom and the United States. As none of these related companies is a reporting entity under the Act, this is not a joint statement.

CyberCX Group Chart (current: 26 August 2021)
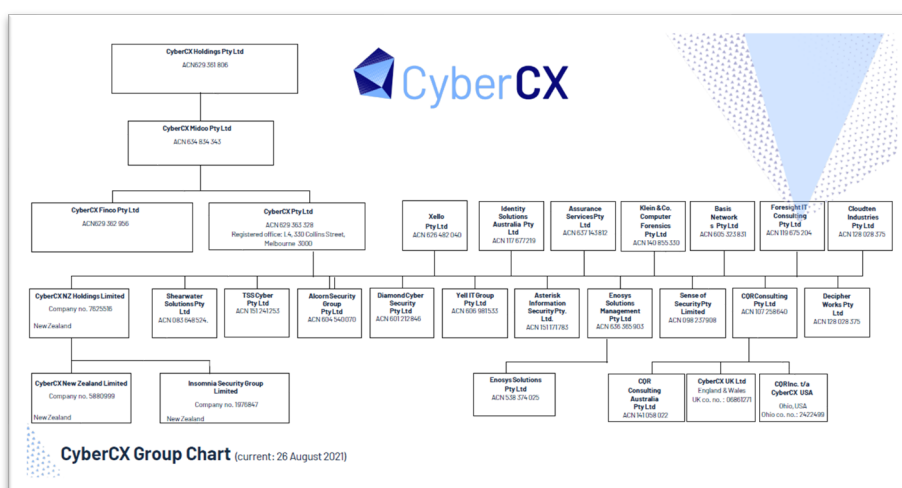
This statement has been prepared covering the financial year ending 30 June 2021.

As a good corporate citizen, CyberCX is dedicated to operating in an ethical and legally compliant manner under the Act, and we expect our suppliers to share these values. We are committed to take appropriate steps to minimise the risk of modern slavery occurring in our operations and supply chains.

The purpose of this statement is to outline CyberCX's approach to ensuring our business and supply chains are conducted within a framework that mitigates modern slavery risk. CyberCX is committed to continuous improvement and taking proactive steps to ensure that modern slavery does not occur in our own business and supply chains.

Cyber Security + Customer Experience

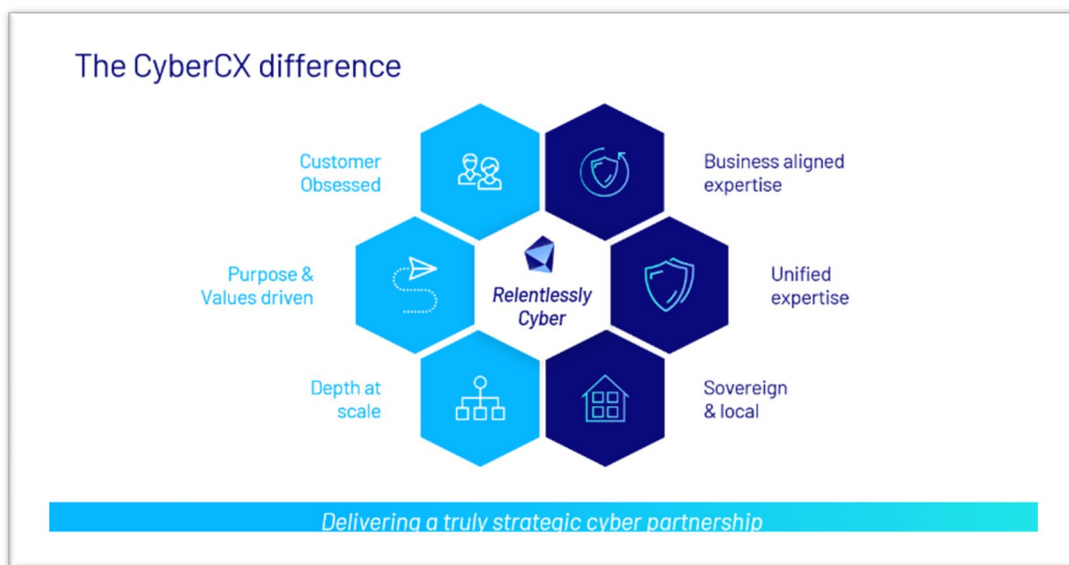## 2. CYBERCX'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Organisational Structure

CyberCX is Australia's largest, leading independent cyber security services organisation, and is rapidly growing in New Zealand.

Though over 20 acquisitions and a compelling employee proposition, we have unified the most trusted brands in the industry, and the leading cyber security experts from across Australia and New Zealand (and a small number of UK and US staff) who built them.

CyberCX. The greatest force of cyber security experts in Australia and New Zealand.

Our purpose is to help private and public sector organisations of all sizes optimise their cyber security and cyber-risk awareness in an increasingly complex and challenging threat environment. We strive to make the online environment safe and to secure and support the communities in which we live. This purpose is described on our website and embedded in our employee code of conduct and numerous other business policy documents. Consistent with this purpose, we are committed to preventing slavery and human trafficking in our operations and supply chains.

The CyberCX difference

Customer Obsessed · Business aligned expertise · Purpose & Values driven · Relentlessly Cyber · Unified expertise · Depth at scale · Sovereign & local

Delivering a truly strategic cyber partnership

Operations

CyberCX is principally involved in the delivery of critical, complex cyber security consulting services to government and business customers. We employ more than 900 professionals located in over 20 offices across Australia, New Zealand, the United Kingdom, and with employee reach into the United States. We are one team on a single mission, and we are customer obsessed. While Australia and New Zealand is our foundation, the world is our aspiration. CyberCX is committed to delivering world class cyber security services and building our presence across the globe. CyberCX is proud to have teams located in Europe and the United States, with a commitment to further investment to expand our reach and impact. We are well placed to take a leadership role in the Asia-Pacific region.

CyberCX provides cyber security services across 9 key 'practices' in the areas of:

- Strategy & Consulting
- Security Testing & Assurance
- Governance, Risk & Compliance
- Security Integration & Engineering
- Identity & Access Management
- Digital Forensics & Incident Response
- Cyber Capability, Education & Training
- Managed Security Services
- Secure Digital Transformation

Key supply chains areas

As identified in our first modern slavery statement for FY2020, CyberCX's supply chain consists of goods and services that support our cyber security consultancy services across Australia, New Zealand, the United Kingdom and the United States. As a professional services focused organisation, that predominantly undertakes desk-based professional IT-based services for customers, within Australia and New Zealand, CyberCX has a limited supply chain when assessing modern slavery risks. Our greatest expenditure is in remuneration of our team members.

A review of our supply chain in FY2021 has confirmed that it is predominantly focused on expenditure that provides the infrastructure, facilities and other support required to enable the delivery of our services in the following key categories:

- Technology and hardware

- Premises and facilities

- Professional services

- Staff costs (which includes staff merchandise and apparel)

- Travel and expenses (noting that the COVID-19 pandemic substantially reduced expenditure in this category for FY2021)

The majority of goods and services by value that we procure come from suppliers based in Australia.

CyberCX also recognises that some of our supply-chain source goods or services from outside Australia, including some jurisdictions that present a higher risk of modern slavery according to the Global Modern Slavery Index[1]. These include:

- IT hardware for personal use – including laptops, docking stations and peripherals – and IT infrastructure – primarily servers and routers - which are produced in China and Malaysia.
- CyberCX merchandise that is procured from suppliers which source goods from China.

In FY2021, CyberCX had over 1,300 suppliers that form part of the operational supply chain. Less than 150 suppliers receive an annual FY2021 expenditure from CyberCX of more than $100,000.

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[1] Global Slavery Index 2018 https://www.globalslaveryindex.org/

3. OUTLINING THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

CyberCX is required to identify the 'risks of modern slavery practices' in its supply chain, meaning the potential for CyberCX to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.

The Modern Slavery Act defines 'modern slavery' as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services.

Operations

As a primarily high-skilled, professional services organisation operating with over 95% of staff in trans-Tasman locations, CyberCX's operations are generally considered to be low risk for modern slavery.

CyberCX carries on business in Australia, New Zealand, the United Kingdom and the United States. It has no operations, joint ventures or partnerships in countries reported to have a high prevalence of modern slavery practices by the Global Slavery Index.

Additionally, our 900+ employee workforce is subject to the requirements of relevant local labour laws and regulations, including the Australian Fair Work Act 2009 (Cth), the New Zealand Employment Relations Act 2000, the United Kingdom's National Minimum Wage Act 1998 and Employment Rights Act 1996, and the federal and state laws in the United States, along with the various workplace health and safety regimes in the jurisdictions in which we operate.

Accordingly, as the key operational functions of CyberCX involve the employment or engagement of staff in our offices in Australia, New Zealand, the United Kingdom and the United States to deliver cyber security services, CyberCX has assessed the risk of modern slavery in its operations as relatively low.

Supply Chain

CyberCX's supply chains consist of goods and services which support our corporate operational departments and client facing services lines. We operate in a sector that is generally considered a low risk for modern slavery; however, we recognise we can be indirectly exposed to modern slavery risks through our supply chains. Excluding remuneration, our major categories of procurement are:

	AREA	EXPOSURE TO MODERN SLAVERY RISKS
	Technology and hardware *Data storage, hardware and software supply, including resale to customers*	Electronics is recognised as a high-risk industry globally. We procure from leading Tier 1 globally recognised suppliers who have mature measures to reduce modern slavery risks in their supply chains, including independent auditing and public reporting of key measures and KPIs. Our ongoing review of these providers gives us comfort they are taking adequate steps to identify and manage modern slavery risks.
	Premises and Facilities *Rental, cleaning, energy and related*	Cleaning services are recognised as high-risk services globally. CyberCX uses the cleaning services provided by the building management (usually large, superannuation-backed infrastructure managers with mature reporting arrangements) at each of our office sites. Further due diligence of this category of our supply chain to occur in FY2022.
	Professional Services *Insurance, audit, legal, accounting and taxation services*	Not considered high risk services. Sourced predominantly from Australia and New Zealand.
	Staff items *Staff apparel and merchandise*	Textiles is considered a high-risk industry globally. We procure staff apparel and merchandise from a number of local suppliers, some of which is made in China, recognised as a country that may present a higher risk of modern slavery practices. A focus in FY2022 will be to more closely assess this area of our supply chain.
	Travel and expenses	Not considered high risk services given that nearly all travel occurs within Australia, New Zealand and the United Kingdom.

4. OUR ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

Governance controls and training

In FY2020, we commenced the design of an enterprise-based governance framework, including Company policies and procedures that apply to all CyberCX team members to promote a culture of compliance, ethical behaviour and honesty.

In FY2021, we have taken further steps to establish this framework by drafting the following new policies that assist to further mitigate against the risk of modern slavery in our operations and supply chain are:

- **Modern Slavery Policy**: aims to confirm our commitment to contributing to ending all forms of modern slavery and sets out how CyberCX aims to reduce the risk of modern slavery practices within our supply chains and operations. We are in the process of refining and finalising this policy for Board approval in FY2022.

- **Supplier Code of Conduct**: sets out CyberCX's key expectations of its suppliers, including the promotion of internationally recognised labour practices and the reduction of modern slavery practices. We are in the process of refining and finalising this policy for Board approval in FY2022.

Further, the rollout of our SaaS-based 'learning management system' during FY2021 has established a company-wide, enterprise-grade compliance-based training platform. This now allows us to 'push out' mandatory training to employees on a broad range of governance, risk and training subjects. In FY2022, we anticipate rollout out mandatory modules that cover supply chain issues.

In FY2021 we completed quarterly employee compliance reviews to ensure we were complying with all applicable laws, awards and standards concerning payment of wages and salaries to staff which did not identify any issues or risks.

We also commenced planning for a third party expert WHS review to assess the effectiveness of our organisational framework, policies, processes and controls concerning work health and safety. This audit has subsequently commenced in FY2022.

Supplier assessments and contractual mechanisms

CyberCX has continued work undertaken in the previous reporting period to assess the risks in its supply chain, and work towards mitigation of those risks.

Recognising that our greatest risk of modern slavery is in our supply chains, in FY2021 CyberCX has continued implementing specific modern slavery clauses in supplier contracts when achievable, recognising that many of our largest suppliers by expenditure are global, mature technology providers that are not willing to agree to tailored clauses, but are able to demonstrate other processes which mitigate modern slavery risks. We have also commenced planning for implementation of a risk screening for all existing and future material suppliers in relation to modern slavery compliance. Once the risk level has been determined for a supplier, CyberCX is committed to undertaking remedial actions as required (which may involve moving to a new supplier that has a more satisfactory approach to modern slavery risks). For example, in FY2021 this has led to us sourcing some of our company apparel from local producers, as opposed to overseas manufacturers.

As part of our ISO27001 certification obtained in FY2021, we commenced implementation of a system-based risk management process, which will eventually include a supplier onboarding process when engaging with new suppliers, which will include a due diligence questionnaire concerning modern slavery practices, as well as ESG risks and other issues. This is expected to be rolled out in 2022. It is expected that all new suppliers will be required to demonstrate that they are managing modern slavery risks as part of their overall operations. It is also expected that, over time, we will be able to undertake a level of due diligence

across all material vendors in our supply chain, and where necessary conduct annual compliance reviews on suppliers where they are deemed to be higher risk.

CyberCX has also

Our focus areas for FY2022

In FY2022, our focus areas for continuous improvement are:

- Continued organisational awareness and engagement on modern slavery requirements, including via face to face and LMS-based training.

- Implementation of CyberCX's Supplier Code of Conduct and Modern Slavery Policy.

- Roll out of our supplier onboarding assessment and questionnaires to assess modern slavery and other risks for new onboarding suppliers.

- Continued implementation of appropriate modern slavery contractual requirements as able.

- Continued work to identify "high risk" suppliers in our supply chain, and an action plan to either work with the supplier to mitigate these risks, or change suppliers to a lower-risk provider.

5. ASSESSMENT OF THE EFFECTIVENESS OF OUR ACTIONS

Our focus in FY2021 has continued to be establishing and embedding the governance policies and frameworks for ethical business conduct and anti-modern slavery programs that were first established in FY20.

Now these frameworks are in place, in FY2022 our focus is on working to finalise and deploy our centralised systems and tools to allow easy, organisational-wide identification, management and mitigation of modern slavery risks in our supply chain.

Bringing together the frameworks and policies, with our implemented systems and tools, will allow us to be well placed to identify and report against appropriate measures of our effectiveness in future reporting cycles. A key focus throughout FY2022 will be on our ability to demonstrate further development in key areas including training, system-based due diligence processes, procurement and engagement with our suppliers.

6. OUR CONSULTATION APPROACH

Given all the various wholly owned subsidiaries in the CyberCX group are integrally connected to CyberCX, with shared management, governance, risk and other corporate functions, we have conducted an internal consultation process across key stakeholders of our executive leadership team, relevant supply chain managers and our Governance, Risk and Compliance team in producing this statement.

7. FURTHER RELEVANT INFORMATION

The continued impacts of the COVID-19 pandemic through FY2021, bringing with it both the need to devote time and resources to our people and customers, and increased demand for our services due to increased cyber threat activity, has required significant organisational focus.
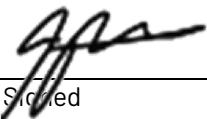
Despite these disruptions, we have made substantial further progress in our management of this important issue including:

- progressing our centralised data collection, analysis and reporting capabilities;

- developing our modern slavery systems and policy; and

- implementing consistent onboarding and management practices in our supplier relationships, including annual information-gathering on their efforts to reduce the potential for modern slavery in their own supply chains.

8. APPROVAL

In accordance with Section 13(2) of the Modern Slavery Act, this Statement was approved by the Board of CyberCX Holdings Pty Ltd on 20 December 2021.

The Board is the principal governing body of CyberCX for the purposes of approving this Statement. This Board has authorised John Paitaridis, Chief Executive Officer, to sign this Statement.

_____   20 December 2021
Signed   Date

John Paitaridis
Chief Executive Officer
CyberCX

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