

# Modern Slavery Act Statement

## Introduction

This statement is made by GBST Holdings Ltd ACN 010 488 874 ("GBST") pursuant to section 14 of the *Modern Slavery Act 2018* (the "Act").

GBST is committed to complying with all legal obligations including, without limitation, the Act and the Modern Slavery Act 2015 (UK). The purpose of this statement is to outline GBST's approach to addressing the risk of modern slavery in GBST's business operations and supply chain.

## Business structure

GBST is a global software business servicing the financial services industry. GBST operates in Australia, the United Kingdom, Hong Kong, Singapore and the United States of America.

GBST's main operations relate to licensing its software products and providing implementation services, customisation services, managed services, support services and consultancy services to its customers. There are also corporate functions including sales, marketing, human resources, finance and legal.

GBST's supply chain is mostly focused on: (a) the procurement of technology to be on sold to customers (software, hosting and cloud services); or (b) embedding or using such technology in conjunction with our products; or (c) using the procured technology to assist GBST in providing its products and services to customers; and (d) procuring software development services from offshore.

## Risk Identification, Management and Due Diligence

As a software and services provider, GBST has assessed the risk and considers the risk of modern slavery within its operations and key supply chains to be low. Nonetheless, GBST has introduced the below measures to identify, assess, monitor and manage modern slavery risk areas.

### Suppliers

GBST reviews the potential risk of modern slavery practices across its supply chain taking into consideration factors such as location, industry and product/service. Suppliers are categorised based on whether they are low, medium or high risk for modern slavery. GBST has focused its immediate efforts on those suppliers it has categorised as high-risk suppliers and ensured these agreements were amended to include warranties on the practices the supplier adhered to in order to reduce the risk of modern slavery in their operations.

When new supplier agreements are entered into or renewed it is a condition of execution that: (a) the agreement contains GBST's standard modern slavery clauses; or (b) due diligence has been carried out to ensure that the supplier has its own statements or policies on modern slavery that reflect GBST's standard modern slavery clauses; or (c) the supplier has completed GBST's modern slavery questionnaire confirming the practices it employs adhere to GBST's standards.

GBST's supply chain is the main areas of focus in addressing modern slavery risk and GBST has successfully ensured that all suppliers identified as high risk are mirroring GBST's standards around modern slavery. GBST is also comfortable in refusing to engage with suppliers that do not meet its modern slavery criteria and has done so in the past.

## Modern Slavery Policy

GBST is committed to ensuring that there is no slavery or human trafficking in any part of its business. To this end, GBST has developed a Modern Slavery Policy, which reflects GBST's commitment to ensure that slavery and human trafficking does not take place anywhere within its business or supply chain. The policy is used to ensure that staff are aware of their obligations in relation to modern slavery and what GBST is doing to address modern slavery in its operations and supply chain.

## Whistleblowing Policy

GBST's Whistleblowing Policy allows employees to raise concerns regarding modern slavery and human trafficking in a confidential manner. During the reporting period, there were no reports made in relation to modern slavery concerns.

## Training

GBST has delivered a dedicated modern slavery training course to all employees during the reporting period. Additionally, all new employees are required to read and acknowledge GBST's Modern Slavery Policy and Whistleblowing Policy as part of their induction process.

## Recruitment

GBST uses reputable recruitment partners across the globe when sourcing employees and contractors and recruitment agreements either contain GBST's standard modern slavery clauses or a due diligence process has been undertaken to ensure such compliance.

## Risk Manager

The Risk Manager will report any modern slavery risk areas to the GBST Executive Team. If a risk raised is closely related to a risk previously identified, then existing practices may be reviewed or extended. If it's a new risk, then relevant GBST teams will be consulted and new practices introduced to minimise the risk.

## Ongoing Assessment of Risk

GBST will continue to manage the risk of modern slavery in its operations and supply chain by continuing to employ the methods and processes identified above and will endeavour to look at new ways that the risk can be further reduced. GBST will also continue to ensure that awareness is raised on the forms of modern slavery amongst our employees and contractors through training and discussion of the issue.

This Statement was approved by Robert DeDominicis in his role as principal governing body of GBST on 24 March 2021.

Signed on 24 March 2021



Robert DeDominicis

Chief Executive Officer

GBST Holdings Ltd | A.B.N. 85 010 488 874