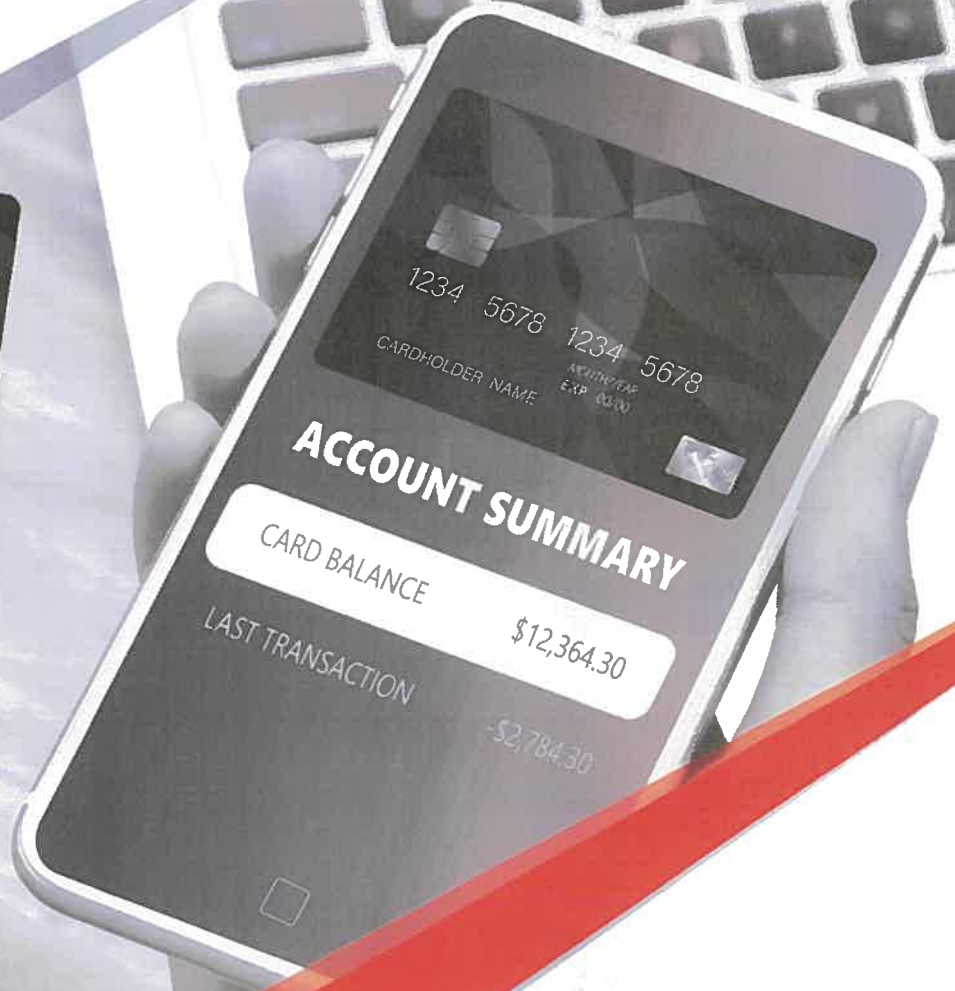


The logo for Attra, featuring the word 'Attra' in a stylized font with a red horizontal line through the middle of the letters 't' and 'r'.

Statement under the Modern Slavery Act 2018
(Reporting Period FY 20 – 1 July 2019 to 30 June 2020)

19 March 2021

Attra Pty Limited
Version 1,0

Reporting Entity

This modern slavery statement is made pursuant to the Modern Slavery Act 2018 on behalf of Attra Pty Limited (ABN 49 069 325 088) and its wholly owned subsidiary companies globally (henceforth referred to as "Attra").

Operations

Established in 1995 as a high-end consulting firm in Australia, Attra has grown over the years into a global company with a presence in 4 continents and a customer base that spans 24 countries. It has sales, marketing, and development centres around the world and employs over 2,000 people.

Attra provides IT Services including Project Management, Business Analysis, System Analysis, Requirement Writing, Development/Maintenance of software, Application integration, Digital services, Migration, Quality Assurance, User Acceptance Testing, Implementation, Environment Management, IT Governance and ongoing IT Application Support Services to clients in the Banking, Financial services, and Insurance domain with a focus on payments technology.

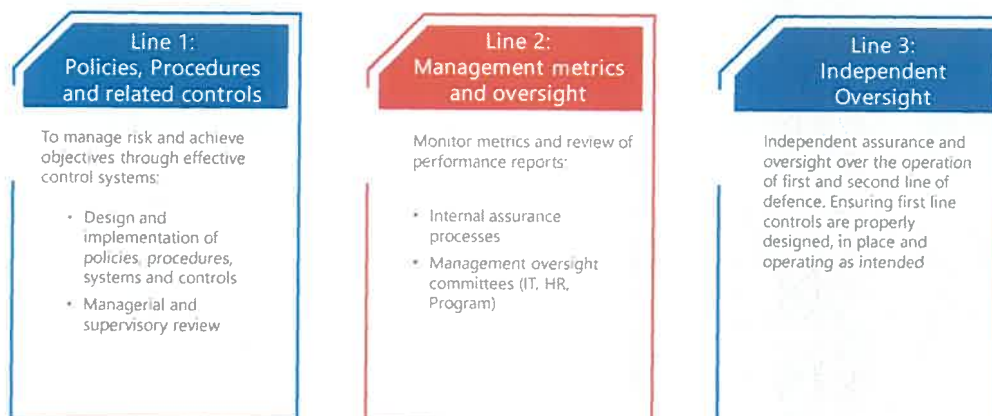
In its quest for quality Attra is appraised with CMMI Level 5 Dev, SVC v2.0, and is PCI DSS, SSAE 18/ISAE 3402 and ISO 27001 certified.

Overview of Our Defence Model

Attra has a robust Enterprise Risk Management framework implementation. Under the governance of the Audit and Risk Committee (ARC) of the Board, risks at an enterprise level are tracked and addressed in a systemic fashion. The risks at the enterprise level are reviewed annually and the work plan for the ARC is prepared based on the outcomes of this review..

Our Enterprise Risk Management framework incorporates the three lines of defence model as depicted below.

Overview of Lines of Defense



Defences in Our Operations

Attra's Code of Business Ethics and Conduct (COBEC) brings together various policies and practices such as

harassment in the workplace, anti-bribery, anti-corruption, and whistle-blower protection. The COBEC policy provides decision making guidance to Attra's workforce, addressing relevant challenges that may arise in day-to-day operations and interactions. Mandatory annual trainings include training on COBEC for Attra's workforce.

Attra has zero tolerance for unethical behaviours and associated regulatory violations and has a whistle-blower policy to provide a mechanism for employees and suppliers to report any such violations. The policy covers reporting of the following incidents:

- Abuse of authority
- Financial irregularities, including fraud, or suspected fraud
- Leakage of information including misappropriation of confidential / propriety information
- Illegal commission or kickbacks
- Falsification of documents/data/records
- Conflict of interest
- Misuse/misappropriation/ wastage of Company assets/funds
- Discrimination at workplace
- Workplace harassment
- Sexual harassment
- Human rights violation including modern slavery
- Bribery & corruption
- Violation of Company's policies, practices and rules, including the Code of Ethics and Business Conduct
- Breach of contracts
- Negligence causing substantial and specific danger to public health and safety
- Criminal offences
- Violation of applicable laws/regulations
- Any other unethical, biased, favoured or imprudent events

Attra continues to evolve its human rights related policies as it periodically reviews and matures its practices across a range of areas encompassed by Attra's corporate social responsibility program.

Defences in Our Supply Chain

Attra's Supplier Code of Conduct requires its suppliers to refrain from unethical practices including modern slavery. This code of conduct is part of Attra's supplier Master Services Agreement. Suppliers also sign an annual declaration to commit adherence to the code of conduct.

As a part of the supplier governance process, Attra performs an annual risk assessment of its suppliers across a range of areas, including information security, privacy, business continuity and modern slavery. Governance of the supplier management function is provided through the Supplier Governance Council (comprising of the CFO, Head of Operation, Head of IT, Head of Information Security, Head of Enterprise Risk Management) that reports to the Audit and Risk Committee of the Board.

The whistle-blower platform is also available to Attra's suppliers for reporting any irregularities and unethical behaviour. Any reported suspected violations will be investigated by the integrity committee, which comprises the Chairman of the Board, Chief Executive Officer, and a member of the Senior Management Team.

Conclusion

Attra addresses the risk of modern slavery and compliance with modern slavery laws through the Audit and Risk



Committee (ARC) of the Board of Attra Pty Limited. All the subsidiary entities of Attra Pty Limited follow the policies and principles as set by the ARC.

In summary:

1. Attra has established policies and procedures within its operations, including its vendor management function that guide its employees and vendors behaviours and seek to address modern slavery risks.
2. Attra management maintains oversight of the operations of its policies and procedures through its internal governance processes, including its supplier governance council.
3. The performance of the risk management function is ultimately governed by the Audit and Risk Committee of the Attra Board, which oversees the performance of managements risk management practices, including the periodic scoping and delivery of independent assurance over the operation of policies and procedures in areas of prioritized risk, including Modern Slavery.

This statement was approved by the Board of Attra Pty Limited on 26th of March 2021.

For and on behalf of Attra Pty Limited

A handwritten signature in black ink, appearing to read "Niranjani Anil Gammampila". The signature is fluid and cursive, with a long, sweeping tail that curves to the right.

Niranjani Anil Gammampila

Chairperson of the Board