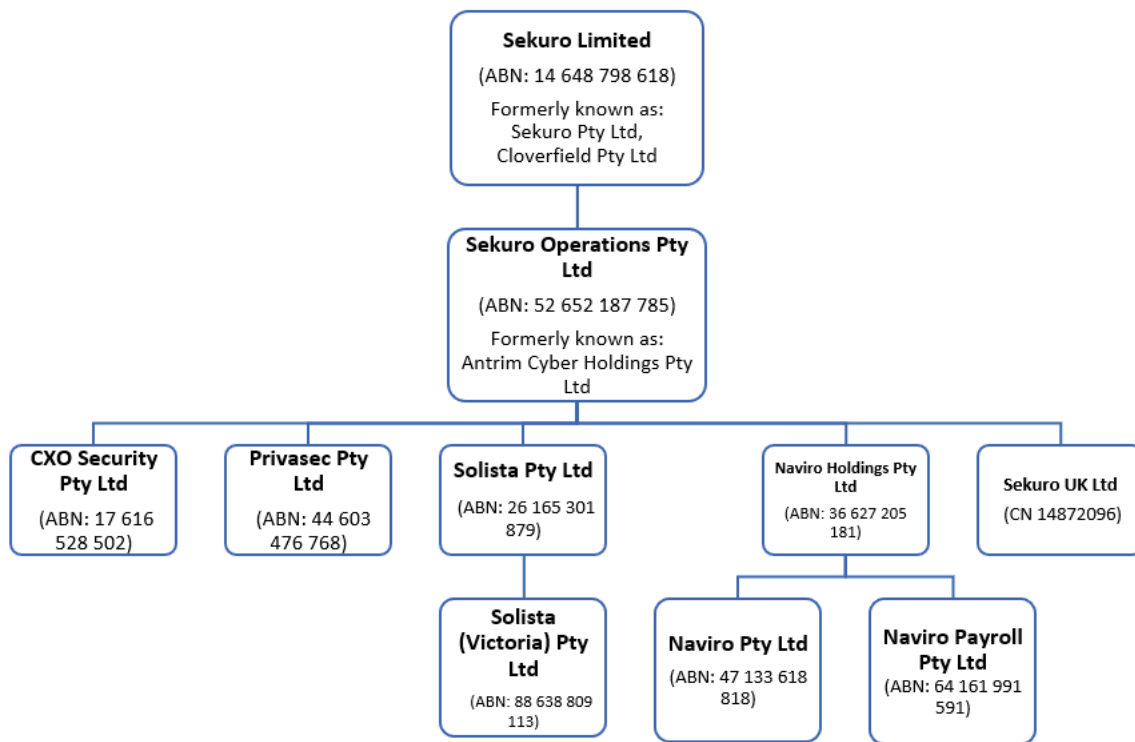# Modern Slavery Statement

Sekuro Limited

01 January 2023–31 December 2023

Purpose

This Modern Slavery Statement is made by Sekuro Limited (Sekuro) (ABN 14 648 798 618) covering the period 01 January 2023 to 31 December 2023 in compliance with the *Modern Slavery Act 2018* (Cth) (the Act). This statement covers all Sekuro subsidiaries, namely:

- Sekuro Operations Pty Ltd
- CXO Security Pty Ltd
- Naviro Holdings Pty Ltd
- Naviro Pty Ltd
- Naviro Payroll Pty Ltd
- Sekuro Ltd (UK)
- Privasec Pty Ltd
- Solista Pty Ltd
- Solista (Victoria) Pty Ltd

Sekuro is the main company which deals with suppliers and distributors across the group. As none of the other companies listed is a reporting entity under the Act, this is not a joint statement.

The purpose of this statement is to:

- Provide an overview of how Sekuro prevents, detects, and responds with mitigating controls to the risk of modern slavery occurring within Sekuro, its supply chain, or in any other business relationships.
- Demonstrate Sekuro's commitment to ensuring that modern slavery does not occur within our own business and supply chains.
- Ensure compliance with the Act (as may be amended from time to time).

Statement

Sekuro has a zero-tolerance approach to modern slavery.

Sekuro is committed to acting ethically and with integrity in all its business dealings and relationships, implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business operations or supply chains.

Sekuro is also committed to ensuring there is transparency in its approach to tackling modern slavery throughout its business and supply chains, consistent with the Sekuro's disclosure obligations under the Act.

The prevention, detection and reporting of modern slavery in any part of Sekuro's business and supply chains is the responsibility of all those working for it or under its control.

Employees, including contractors, are encouraged to raise concerns with their manager or Sekuro's Senior Leadership Team (SLT) about any likely modern slavery breaches in any parts of Sekuro's supply chains or business, at the earliest possible stage.

Sekuro expects the same high standards from all its contractors, suppliers, and other business partners. Sekuro's contracting processes include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expects suppliers to hold their own suppliers to the same high standards.
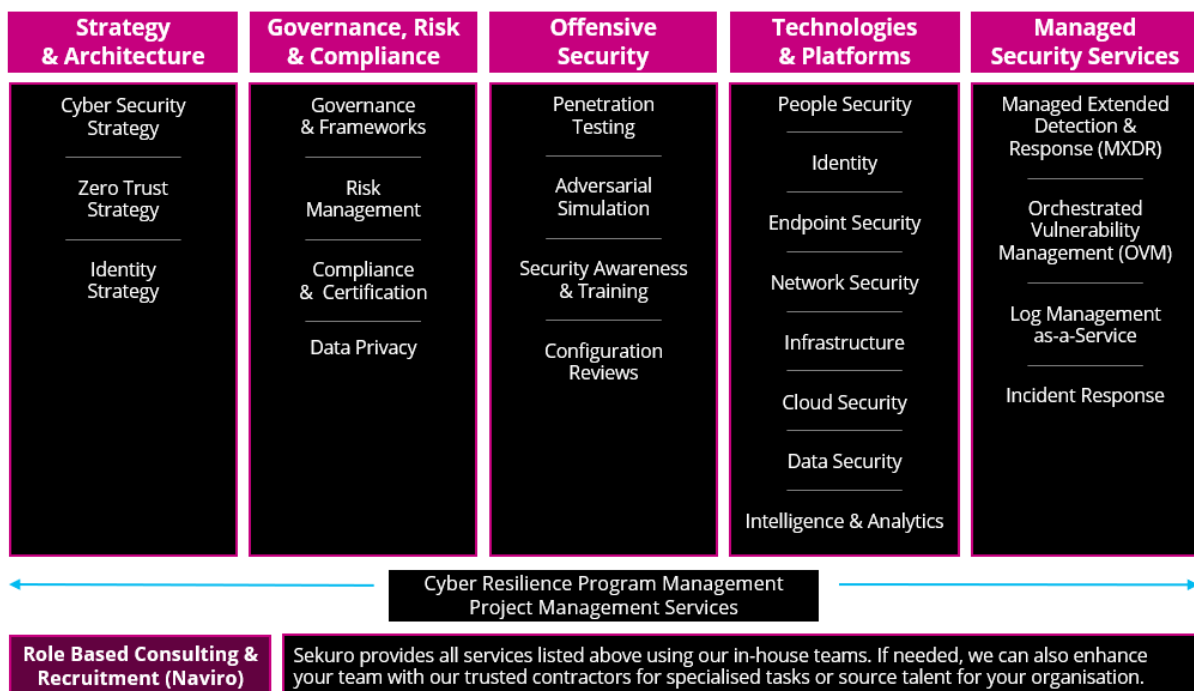
This statement is an integral part of our approach to addressing modern slavery.

Operations and Supply Chain

Sekuro is a cyber security and business resiliency solutions provider that helps CIOs and CISOs take a strategic approach to cyber security risk mitigation and digital transformation. Operating at the intersection of the digital technologies and cyber security industries, Sekuro reduces cyber risk while new technologies are adopted – ultimately building business resiliency and enabling fearless innovation.

Our practice areas work together to look beyond the threat landscape of today and into the opportunity landscape of tomorrow. Rather than relying on a siloed approach, we engage our practice areas to provide the right outcomes for each client's unique needs.

Our practice areas include:

Strategy & Architecture	Governance, Risk & Compliance	Offensive Security	Technologies & Platforms	Managed Security Services
Cyber Security Strategy	Governance & Frameworks	Penetration Testing	People Security	Managed Extended Detection & Response (MXDR)
Zero Trust Strategy	Risk Management	Adversarial Simulation	Identity	Orchestrated Vulnerability Management (OVM)
Identity Strategy	Compliance & Certification	Security Awareness & Training	Endpoint Security	Log Management as-a-Service
	Data Privacy	Configuration Reviews	Network Security	Incident Response
			Infrastructure	
			Cloud Security	
			Data Security	
			Intelligence & Analytics	

Cyber Resilience Program Management
Project Management Services

Role Based Consulting & Recruitment (Naviro) — Sekuro provides all services listed above using our in-house teams. If needed, we can also enhance your team with our trusted contractors for specialised tasks or source talent for your organisation.

- **Strategy & Architecture:** We help clients develop a cyber security strategy incorporating zero trust and identity management.
- **Governance, Risk & Compliance:** We help our clients navigate regulatory requirements and industry standards with confidence.
- **Offensive Security (Sekuro RED):** We identify vulnerabilities in our clients' systems and test their defences.
- **Technologies & Platforms:** We create and maintain a leading technology ecosystem to provide our clients with best-in-class solutions.
- **Managed Security Services**: We provide our clients with 24/7/365 threat detection and response services, acting as an extension of our clients' team.
- **Role Based Consulting & Recruitment**: We enhance your team by sourcing talent.

The majority of Sekuro's suppliers are large multinational Software-as-a-Service (SaaS) providers, such as Microsoft and Atlassian. Each is subject to extensive due diligence processes to ensure

compliance with appropriate regulatory guidelines, including, where appropriate, anti-slavery legislation. The non-SaaS vendors of Sekuro are almost all based in Australia.

All vendors are reviewed directly in accordance with Sekuro's Vendor Management Policy.

Identification of Risks of Modern Slavery

Sekuro is required to identify risks to modern slavery in its operations and/or supply chain. Modern slavery is a crime and violation of human rights that is defined under the Act as including eight types of serious exploitation:

- Trafficking in persons
- Slavery
- Servitude
- Forced marriage
- Forced labour
- Debt bondage
- Deceptive recruiting for labour or services, and
- The worst forms of child labour, which means situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Sekuro takes due care and diligence in conducting high-level risk assessments of our internal systems and vendors through our Vendor Management Policy and tracking any risks through our Risk Management Framework and associated procedures.

Operations

Sekuro has identified minimal risks concerning modern slavery in our workforce. The countries in which Sekuro operates have highly regulated employment law environments which protect employees, and we provide additional checks through our Vendor Management Policy and People Policy. Sekuro's People Policy details processes and communication pathways for employees to disclose misconduct.

Additionally, Sekuro's employee workforce is subject to the requirements of relevant local labour laws, including the *Fair Work Act 2009* (Australia) and the *Employment Rights Act 1996* (UK).

Supply chain

Many suppliers that work with Sekuro are based in Australia. These suppliers with data centres and headquarters in Australia have a low exposure to modern slavery-related risks as they are required to comply with this Act and operating in a highly skilled sector. Although we operate in an industry that is generally considered a low risk for modern slavery, we are aware we can be indirectly exposed to modern slavery risks through our supply chains. A risk assessment is conducted and reviewed for every supplier to ensure modern slavery is considered in accordance with our Vendor Management Policy.

Risk assessments of our supply chain have showed that, to enable the delivery of our services, our risks relating to modern slavery can be grouped at a high level into the following categories:

- Technology and hardware
- Premises and facilities
- Professional services
- Staff costs, including staff merchandise and apparel

- Travel and related expenses (limited in line with our carbon emissions targets), and

- Hospitality and entertainment.

The majority of what we procure comes from suppliers based in Australia.

Area	Exposure to Modern Slavery Risk
Technology and Hardware	Globally, the electronics sector is one with many potential supply chain risks. We source from suppliers with a global reputation as well as distributors with Australian headquarters that have developed procedures to lower risks relating to modern slavery in their supply chains. We are reassured by these suppliers' abilities to detect and manage risks related to modern slavery as a result of our regular examination of them.
Apparel and Merchandise	The textiles sector is regarded as a high-risk sector for modern slavery. We purchase staff clothing and goods from a number of regional suppliers, some of which are produced in China, a nation known to have higher risks relating to modern slavery practises. We continue to communicate with our distributors and suppliers to ensure that our suppliers have ethical production practices in place and consider their impact on the environment.
Professional Servies	Most of our professional services are obtained from companies in Australia. For Sekuro's purposes, this sector can be considered a low-risk sector with a minimal amount of risk associated with modern slavery. Despite this, we still review and consider our exposure to risk in this area and minimise it accordingly to the extent possible.
Premises and Facilities	Cleaning services are acknowledged as high-risk services. We make use of the building management's cleaning services at each of our office locations.
Travel	Travel occurs domestically and abroad, primarily in Australia, Southeast Asia, the United Kingdom, and the Unites States of America. Travel is limited due to the increased use of hybrid work arrangements.
Hospitality and Entertainment	We work alongside entertainment and catering services for staff and customer facing events. We believe there is a low risk of modern slavery occurring in this sector, although we communicate with the providers of these services and review their practices to determine if any risk should be addressed.

Actions to Address Modern Slavery Risks

Governance controls and training

Sekuro has developed internal governance controls for engaging with suppliers (and in particular high risk sector suppliers).

Sekuro:

- Publishes a Modern Slavery Policy

- Reviews our procurement policy and procedures to ensure inclusion of modern slavery clauses

- Updates our standard procurement agreements to include contractual obligations to address modern slavery compliance so that all new suppliers commit to adherence to the new modern slavery requirements

- Updates our tender documents to include modern slavery-related questions to ensure we identify modern slavery risks early with new suppliers during the procurement process

- Continues to improve our engagement with our suppliers to ensure we have a clear understanding of their businesses and modern slavery risks

- Continues to refine our internal online training programs and ensures staff undertake annual mandatory refresher training to all employees (this program covers a broad range of governance, risk and training subjects and is expanding to tailored modules for supply chain risks)

- Actively monitors its internal compliance with applicable laws and workplace awards and standards, and

- Revises aspects of our WHS policies and procedures, considering risks posed by communicable diseases such as COVID-19, and continues to improve these to maintain employee safety.

Policies

In addition to our Modern Slavery Policy, Sekuro has multiple policies in place through which it both assesses and seeks to prevent modern slavery practices within its own operations and the operations of its suppliers. These processes include, but are not limited to, the policies referenced below.

Acceptable Use Policy

Through these policies we commit to ensuring the health, safety and wellbeing of our employees and remain compliant with Australian workplace and safety laws. Sekuro's offshore operations also adhere to the relevant legal, customs and regulatory obligations. These policies include requirements to: ensure our workplace is free of any type of discrimination, intimidation, harassment or bullying; not use child labour or forced labour; provide and promote a safe work environment; and treat everyone fairly.

People Policy

Sekuro's People Policy details processes and communication pathways for employees to disclose misconduct, including any conduct related to modern slavery.

One of Sekuro's key values is that we would rather act in a way that maintains our ethical standards than make a quick profit. Senior management encourages all new employees to support these values and report any instances in which people affiliated with Sekuro may not be following this standard.

Vendor Management Policy

Suppliers are assessed in accordance with this policy initially before being contracted with, and again on an annual basis for their suitability as partners from Sekuro's perspective. This policy includes a requirement to check whether our suppliers are complying with relevant anti-slavery legislation.

Supplier Assessments and Contractual Reviews

Sekuro has continuously improved their supplier assessments to reduce risks, including risks relating to information security and modern slavery. Sekuro has recently updated our supplier onboarding process to incorporate further detailed questions concerning privacy, information security, WH&S, environmental security, and modern slavery policies. Once a new or ongoing supplier has identified a risk that relates to the aforementioned criteria, Sekuro is committed to remediating these risks. This process aligns with Sekuro's ISO 27001 certification.

Recognising that the biggest risk of modern slavery originates from our supply chains, Sekuro's initiative aims to implement specific modern slavery clauses in supplier contracts when achievable, recognising that many of our largest suppliers by expenditure are global providers.

Future Developments

In our upcoming reporting year, we aim to continue to revise and develop our approach to modern slavery compliance to build capacity within our business to monitor and act on modern slavery risks. In particular, Sekuro intends to focus on:

- Ongoing refinement and implementation of Sekuro's Supplier Assessment process and internal policies
- Continued implementation of appropriate modern slavery contractual requirements as able
- Further developing modern slavery awareness and training within Sekuro and our supply chains, and
- Organising periodic classification review of high-risk suppliers and determine whether the risks discovered related to modern slavery will be mitigated or if Sekuro will change suppliers.

Modern Slavery Statement Reporting Requirements

This statement has been prepared by Sekuro Limited in accordance with the Modern Slavery Act 2018 (Cth). This statement was approved by the Board of Directors of Sekuro Limited on 2 April 2024, who has authorised Noel Allnutt, Chief Executive Officer, to sign this statement.

Signed: *NDALH*

Name: Noel Allnutt

Role: Chief Executive Officer

Please call or email our office for enquiries related to this Modern Slavery Statement.

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- Email: info@sekuro.io