



Modern Slavery Statement

INTRODUCTION

Banktech Australia Pty Ltd ('Banktech') is committed to mitigate the risk of all forms of "Modern Slavery" as defined by the Modern Slavery Act 2018 (Cth) and NSW Modern Slavery Act 2018 by improving processes and procedures accordingly. Below is a summary of Banktech's structure, internal operations and supply chain along with our initiatives to minimise the risk of modern slavery within Banktech's supply chain and operations.

1. Banktech Structure

Banktech was established in the ATM industry in 1991. Originally supplying ATMs and parts to banks, building societies and credit unions, in 1998 Banktech became the first independent (non-bank) ATM distributor with the launch of the CashConnect ATM Network. Today, Banktech Australia owns and operates more than 2,500 ATMs across hotels, clubs and casinos across Australia.

Banktech employs approximately 135 staff members across its Australian operations across several departments:

- Sales and Marketing
- Software and Hardware Development
- Manufacturing and Warehousing
- Operations and Customer Service
- Technical Services and Information Technology
- Finance, Contracts and Compliance

All staff report to the Senior Manager of each department who reports to the Group Managing Director.

2. Supply Chain

Banktech's supply chain consists of proprietary hardware, firmware and software products which are "fit-for-purpose". Other items include "off-the-shelf" computer hardware and software.

3. Anti-Modern Slavery Policy

Banktech's policies have been created to ensure no Modern Slavery occurs within any functions of the company. Our Anti-Modern Slavery Policy also extends to any associates of Banktech to ensure ethical practices and strict controls are upheld to eliminate the potential risk of Modern Slavery.

All staff at Banktech are required to remain compliant with the policy and must acknowledge their understanding of the requirements within. Please also find attached a copy of Banktech's "Anti-Modern Slavery Policy".

4. Risk Assessment

Banktech upholds a robust compliance program which includes assessing the suitability of all associates of the company. This includes probity of potential staff members and any association within the supply chain. Along with a Modern Slavery Questionnaire, regular interaction with suppliers confirms their suitability to be associated with Banktech. Banktech also requests confirmation from suppliers that they have implemented a similar Anti-Modern Slavery policy and that they have suitably assessed their supply chains for any potential existence of Modern Slavery. Banktech may also request evidence of such policies which are reviewed by Management to assess their suitability and identify any items which Banktech requires further action to be taken.

5. Potential Risks within our Operations and Supply Chain

Banktech has undertaken a review across our operations and supply chain to identify any potential risk of modern slavery practices while taking into consideration to the following profiles:

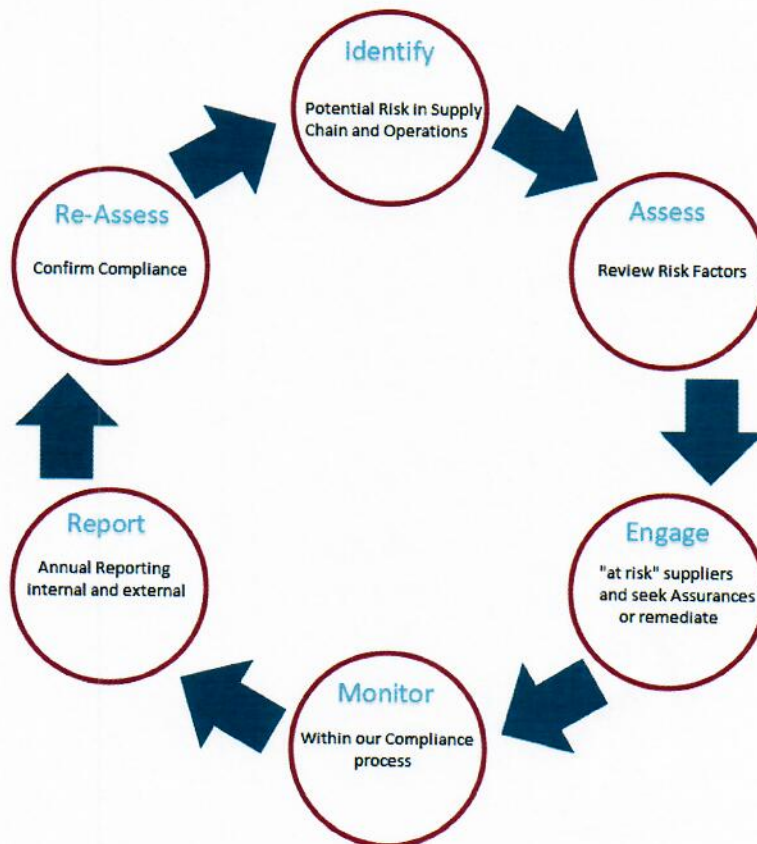
- High Risk Populations -- low skill base workers, migrant workers
- High Risk Categories -- consumables, raw materials, services providers
- High Risk Business Models -- franchising, seasonal workers, labour outsourcing
- High Risk Geographies -- corruption, conflict, ineffective laws, dereliction of human rights

Suppliers considered to potentially fall within any of these profiles were reviewed and further assurances sought from these suppliers that they are; aware of and compliant with the Modern Slavery Act 2018 (Cth) and NSW Modern Slavery Act 2018 and can provide a statement or evidence of their compliance. Banktech's review process has been documented within our Anti-Modern Slavery policy and will be further refined over time such that continual improvement and assurance can be achieved.

6. Assessing the Effectiveness of Our Actions

We have incorporated processes to address the various risks of modern slavery practices in our Anti-Modern Slavery policy. This will ensure that Banktech has a robust and effective framework that is embedded into our business.

Our current and future approach towards evaluation, identification and mitigation of Modern Slavery is represented in the diagram below:



7. On-going Initiatives

Banktech remains vigilant across all aspects of the company. As part of the Anti-Modern Slavery policy, all employees are requested to assess and consider actions by suppliers or potential suppliers to ensure they do not contravene the high standards and requirements set by Banktech. Each employee will be required to acknowledge their understanding of the policy on a yearly basis which is tracked via Human Resources as part of the on-going training of employees.

The risk assessment process is live and on-going. Any changes to a supplier's circumstances or practices will need to be reviewed by Banktech Management who will make further enquires if required.

For the reporting period up to **June 30, 2020** and at the date of this statement, suppliers for Banktech have satisfied all requirements stipulated within the Banktech Anti-Modern-Slavery Policy and Questionnaire.

8. Policies and Resources

Banktech implements various policies within the company which complement the Anti-Modern Slavery Policy, these will assist with the identification and mitigation of potential risks within the supply chain, enhance our live monitoring practices and awareness of risks and protect employees from who come forward to identify the potential existence of Modern Slavery within the supply chain. These policies are listed below:

- HR 025 - Anti-corruption and Anti-Bribery Policy.
- HR 028 - Whistleblower Policy
- 01a_ComplianceFramework_Banktech_QualityManual_PolicyAndObjectives_e32583

9. Policy Effectiveness

As part of Banktech's quality initiatives, internal and external reviews of the value and effectiveness of policies take place. This will also include the Anti-Modern Slavery Policy as part of the review process.

*This Modern Slavery Statement has been written for Banktech Australia Pty Ltd and is pertaining to the financial year ending **June 30, 2020** and approved for release by the Group Managing Director.*



Davin Glen
Group Managing Director

15/2/2021

Date Approved