

MODERN SLAVERY STATEMENT

Centrepont Alliance Limited
(ABN 72 052 507 507)

9 December 2022

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1. INTRODUCTION

This is the third Modern Slavery Statement (**Statement**) of Centrepoint Alliance Limited ABN 72 052 507 507 (**Centrepoint Alliance** or **the Company**) and has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (the **Act**).

Centrepoint Alliance is committed to ensuring we have effective policies and procedures in place to minimise the risk of modern slavery occurring within our business operations and supply chains. Centrepoint Alliance has a strong commitment to governance processes, risk management, corporate culture, safety and compliance. These underpin the Company's commitment to a strong ethical and responsible approach to the conduct of our business operations.

This Statement sets out the actions that Centrepoint Alliance has taken to understand the potential modern slavery risks related to its business, and the steps it has implemented in the financial year ended 30 June 2022 (**Reporting Period**) to identify and prevent modern slavery in its supply chain.

2. CENTREPOINT ALLIANCE'S BUSINESS

The Centrepoint Alliance Group

Centrepoint Alliance and its controlled entities (the **Centrepoint Alliance Group**) operates in the financial services industry in Australia and provides a range of financial advice and licensee support services (including licensing, systems, compliance, training and technical advice) and investment solutions to financial advisers, accountants and their clients across Australia, as well as mortgage aggregation services to mortgage brokers.

The Centrepoint Alliance Group holds five Australian Financial Services licences and one Australian credit licence and is the Responsible Entity for an IDPS-like scheme.

As at 30 June 2022, the Centrepoint Alliance Group provided technical, compliance and business management support services to approximately 517 financial advisers under its own licences and provided services to over 192 self-licensed financial practices. The Centrepoint Alliance Group consists of a number of entities in the areas of Licensee & Advice Services, Funds Management & Administration, Corporate and Technology.

The below table includes all entities that are 100% owned by Centrepoint Alliance.

Name	Principal Activity
Licensee or Advice Service	
Centrepoint Alliance Lending Pty Ltd	Mortgage broker/aggregator
Alliance Wealth Pty Ltd	Financial advice
Professional Investment Services Pty Ltd	Financial advice
ClearView Financial Advice Pty Ltd	Financial advice
Matrix Planning Solutions Limited	Financial advice
Associated Advisory Practices Pty Ltd	Support services to AFS licensees
LaVista Licensee Solutions Pty Ltd	Support services to AFS licensees

Name	Principal Activity
xseedwealth Pty Ltd	Salaried advice
Funds Management and Administration	
Investment Diversity Pty Ltd	Packages investment platforms
Ventura Investment Management Limited	Packages managed funds and Responsible Entity
Corporate and Technology	
Centrepoint Alliance Services Pty Ltd	Trustee-employee share plan
Centrepoint Services Pty Ltd	Service company
Centrepoint Wealth Pty Ltd	Holding company
Presidium Research and Investment Management Pty Ltd	Dormant
Professional Accountants Pty Ltd	Loans to advisers
Enzumo Corporation Pty Ltd	Technology service company
Enzumo Consulting Pty Ltd	Technology consulting services

During the Reporting Period, the Centrepoint Alliance Group engaged approximately 274 suppliers, a slight increase on the number of suppliers engaged in the prior year. Centrepoint Alliance aims to establish a relationship of trust and integrity with all its suppliers, which is built upon mutually beneficial factors.

Centrepoint Alliance's Modern Slavery Governance Framework

The Company's purpose is to ensure our authorised representatives and licensees provide the best financial advice and financial services to the Australian community. Our values and expectations are reinforced across the Company through various communication channels, policies and training.

The Centrepoint Alliance Board of Directors is accountable for the Centrepoint Alliance Group's audit risk and compliance framework. The Company's internal Modern Slavery Working Group reports to the Board through the Compliance Committee and the Group Audit, Risk and Compliance Committee.

3. RISKS OF MODERN SLAVERY IN CENTREPOINT ALLIANCE'S OPERATIONS AND SUPPLY CHAINS

Centrepoint Alliance operates in the regulated Australian Financial Services environment, and within a highly regulated labour market with award safeguards for employees in most industries, with the risk of modern slavery in our operations on-shore being assessed as being low.

Centrepoint Alliance recognises that as a responsible company we must regularly assess our processes and identify any potential risk areas. Centrepoint considers it has a low risk of exposure to modern slavery practices because:

- Centrepoint does not have any offshore employment or office arrangements;

- Centrepont Alliance has implemented employment standards which meet or exceed the *Australian Fair Work Act 2009*; and
- All employees, advisers and suppliers are encouraged to report any concerns directly to Centrepont Alliance via Centrepont Alliance's Whistleblower Policy.

Accordingly, the following potential risks in our operations and supply chain have been identified, although they are considered very low risk:

- Centrepont Alliance may be at risk of involvement in modern slavery because some work (paraplanning and software coding) may be performed remotely or offshore;
- Contractors or our advisers may use uneducated or foreign workers, (example cleaners at leased premises); or
- Suppliers may provide services from offshore locations where Centrepont Alliance has limited direct visibility as to operational standards.

Centrepont Alliance has identified the following risks in our operations and supply chain which are considered a higher risk:

- Leased property cleaning and facilities services; and
- Computer, information and communication hardware such as devices, phones and computers.

Centrepont Alliance risk assessment

The Centrepont Alliance Modern Slavery Working Group has assessed the modern slavery risk for each supply chain, at a certain spend level. The methodology is based on value of spend, geographic risk, services/product risk, sector risk and entity risk.

Due diligence has been performed on the relevant parties, with declarations in relation to their modern slavery practices, being received by relevant persons on behalf of those identified parties. The declarations include confirmation whether or not relevant parties produce their own Modern Slavery Statement in accordance with the Act or whether they have implemented any other written practices to identify and mitigate modern slavery risks within their organisations and supply chains.

In addition, Centrepont Alliance undertakes periodic reviews to obtain various assurances from advisers including their employment practices.

Centrepont Alliance will not support advisers, suppliers or contractors where we become aware, or where we have reasonable grounds to believe, that slavery or human trafficking are taking place in their own businesses or their supply chain.

Centrepont Alliance has made an overall assessment that its operations and suppliers present a low risk of modern slavery. Centrepont Alliance notes that many of its suppliers (including many of its largest) are in the financial services industry. In Australia, Centrepont Alliance understands this industry is considered to have a lower risk for prevalence of modern slavery.

Of Centrepont Alliance's top suppliers the biggest risk remains with a single supplier who provides paraplanning services using contractors based in the Philippines. The Philippines has a medium to high prevalence of modern slavery according to the Global Slavery Index. However, the Global Slavery Index ranks the government response in the Philippines to be high.

It has also been identified that the majority of our top suppliers are all reputable large companies with strong governance structures. It has been identified that of the top 20 Centrepoint suppliers, 12 have their own Modern Slavery Statement and policies and 17 have some form of written policy which identifies and minimises modern slavery risks within their organisations and/or otherwise facilitates the reporting of instances of modern slavery or other substandard working conditions. Of the 3 suppliers which did not confirm they have written policies in place, all of these suppliers only conduct business within Australia and have been assessed as having a low risk of modern slavery. Centrepoint Alliance conducts rigorous due diligence process prior to engaging a new service supplier of material contractual value. Due to the size of many of our top suppliers, the majority of them qualify as reporting entities under the Act.

4. POLICIES AND GOVERNANCE

Centrepoint Alliance's approach to modern slavery is a company-wide approach. Its governance structure oversees the management of modern slavery risks.

Centrepoint Alliance has a comprehensive risk management framework that addresses all operational risks to the business including modern slavery risk, mitigation and prevention. Centrepoint Alliance continues to risk assess each of its top suppliers to identify any potential for modern slavery risk.

Centrepoint Alliance continues to engage with new or re-engaged suppliers throughout the contract process to ensure modern slavery risks in their business are addressed in contractual terms.

Centrepoint Alliance has recently updated the following policies which assist in identifying and preventing modern slavery in its operations:

- **Whistleblower Protection Policy** – Centrepoint Alliance encourages all employees, customers and suppliers to report any suspicion of modern slavery without fear of retaliation. Centrepoint Alliance ensures a confidential process to protect the identity of whistleblowers.
- **Code of Conduct** – Centrepoint Alliance's code of conduct encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. Centrepoint Alliance strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

5. AWARENESS AND TRAINING

Centrepoint Alliance has raised awareness of modern slavery issues by undertaking mandatory annual training with all members of its staff to maintain a focus specifically on modern slavery. The training included information regarding:

- What is modern slavery;
- How we can identify modern slavery; and
- What is Centrepoint Alliance doing to combat modern slavery.

Centrepoint Alliance's management are engaged and are also trained in modern slavery risks.

6. HOW CENTREPOINT ALLIANCE IS PERFORMING AND NEXT PHASE

In its third Reporting Period, the risk of modern slavery in Centrepoint Alliance's operations and supply chain, remains as being low.

During the next reporting period Centrepoint Alliance will further review our practices with a commitment to:

- developing further policies and procedures that strengthen our commitment to mitigating modern slavery in our supply chains, where possible;
- continue our due diligence to identify material modern slavery risks in our operations and supply chains;
- include an attestation from each corporate authorised representative as to how they are addressing modern slavery within their practices;
- where possible integrate modern slavery requirements (for example evaluations, questionnaires) into procurement and review processes for suppliers and contractors; and
- continue to develop training for engagement of management and staff on the issue of modern slavery.

7. PROCESS OF CONSULTATION

The Centrepoint Alliance Board of Directors is the principal governing body of the Centrepoint Alliance Group.

All subsidiaries reporting into the Centrepoint Alliance Group operate under a common and consistent governance framework to build expectations and raise awareness when assessing and addressing modern slavery risks in its operations and supply chain.

8. OTHER RELEVANT INFORMATION

This statement covers the Reporting Period 1 July 2021 to 30 June 2022 and has been approved by the Board of Directors of Centrepoint Alliance Limited by circular resolution on 1 December 2022.



John Shuttleworth
Chief Executive Officer

9 December 2022

Modern Slavery Reporting Criteria

Mandatory Criteria (section 16 of the Act)	Relevant section in Statement
The reporting entity	Section 1 - Introduction
Structure, operations and supply chains	Section 2 – Centrepoint Alliance's Business
Risks of modern slavery practices in our operations and supply chain and any controlled entities	Section 3 - Risks of Modern Slavery in Centrepoint Alliance's Operations and Supply Chains
Actions taken to assess and address those risks, including modern slavery due diligence and remediation processes	Section 3 - Risks of Modern Slavery in Centrepoint Alliance's Operations and Supply Chains
How the effectiveness of actions taken were assessed	Section 3 - Risks of Modern Slavery in Centrepoint Alliance's Operations and Supply Chains
The process of consultation with owned and/or controlled entities	Section 7 - Process of Consultation
Any other relevant information	Section 8 - Other Relevant Information