

# Modern Slavery Statement - ANZ

## People & Organisational Development

August 2022

v.2.0



## Structure, operations, and supply chains

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Civica are a global leader in software for public services, providing cloud software and digital solutions used by more than two million professionals worldwide. Headquartered in London, we have operations and offices in the UK, Ireland, New Zealand, Singapore, India, USA, Canada and Australia. Our supply chains are predominantly based within the countries in which we operate, and our parent organisation is Civica Group Limited.

This statement is intended to meet the requirements of the Modern Slavery Act 2018 (Cth) and describes the steps taken by Civica Pty Limited during the financial year ending 30 September 2021 to seek to minimise the risk of modern slavery occurring in our business and supply chain. As Civica Group Limited is headquartered in the UK, we operate on a financial reporting period of 1 October - 30 September.

Due to the nature of our services, our business operations are predominantly in the software development and technical arena, in addition to professional services, including project management, customer support, service delivery and implementation.

In Australia, we provide services to a range of public and private sector organisations, such as local and federal government, schools and libraries, private hospitals, and many in the for-purpose sector.

## Risks

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Civica has a complex supply chain due to the variety of solutions and product sets offered to our customers. This supply chain can be split between four key areas: Property, Indirects, ICT Services, and ICT Hardware. Civica focuses primarily on key market leaders in its market such as Microsoft/Amazon Web Services/HP & Cisco where downstream supply chains are adequately vetted and reported upon. An annual Modern Slavery review is completed as part of our ongoing assurance due diligence (this complements our new supplier on-boarding process), to ensure the supply chain is compliant with risks such as product, location, country of origin and evidence of company policy monitored.

## Actions taken

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Due to the nature of the supply chain, Modern Slavery risks are inherently higher in the hardware and peripheral item category, as the production process relies on factory labour.

Additional steps to manage the risk include sourcing goods from recognisable brands and reputable resellers, with evidenced processes and policies in place along with products/ suppliers that are assessed based on the country of origin. Countries and regions are assessed for risk based on the Global Slavery Index, taking into consideration the latest updates from The Department of Home Affairs.

## Due diligence

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We undertake due diligence in relation to slavery and human trafficking when considering taking on new suppliers and review our existing suppliers on a periodic basis. Our due diligence and reviews include:

- Mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified
- When a supplier is deemed to be higher risk by country of origin and/or lack of suitable policy/processes, an investigation is raised and assessed by senior members of the purchasing team which can result in the vendor being inactivated
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## Awareness-raising programme

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The organisation has raised awareness of modern slavery issues by circulating information to employees. The information explained to relevant employees includes:

- The principles of the Modern Slavery Act 2018 and how it applies to Civica
- How employers can identify and prevent slavery and human trafficking
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example, reporting through the Australian Federal Police.

We are currently also improving our mandatory and refresher training for all employees and planning to strengthen knowledge through these activities.

## Assessing effectiveness

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We measure the effectiveness of these actions through various metrics which have been summarised in the table below:

Action:	Metric:
Due diligence	At onboarding, the Global Slavery Index is used for assessing supplier risk as part of the supplier setup review done by Procurement.  All Tenders request information and compliance to ISO9001 and 45001 which is applicable to forced labour and modern slavery.  Suppliers deemed higher risk are identified and reviewed annually.

Training	<p>Number of people who have received the training.</p> <p>Number of people who have completed refresher training.</p> <p>Total number of suppliers assessed as compliant with modern slavery requirements.</p>
Reporting and monitoring mechanisms	<p>Number of reports from people with issues concerning modern slavery.</p>

We also have the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- HR Policy:** we intend to highlight our Modern Slavery Statement within our newly updated Employee Handbook which will be available to all employees upon commencement of employment. We have zero tolerance of any threat of physical or sexual violence, harassment, or intimidation against employees and their family, or close associates. Our policies are clearly defined and communicated to all employees. All our employees are treated fairly and equally and are paid at least the national minimum wage. We also ensure that the hours of work for our employees are in accordance with legislation, with a maximum of 38 hours per week plus any reasonable additional hours.
- Purchasing Policy:** we are committed to conducting purchasing activities in a fair, objective and transparent manner that satisfies the requirements of accountability and internal controls including but not limited to Civica’s ‘Quality Management’, ‘Environmental’, ‘Ethical Code of practice’, ‘Anti-Bribery’ and ‘Modern slavery and Human Trafficking’ policies which fulfil legal and financial obligations and effectively manages commercial risk. Emphasis is placed on selecting suppliers and service providers that demonstrate recognisable environmental, sustainable, business integrity along with Corporate Social Responsible (CSR) standards including but not limited to compliance with laws and regulations, respect for human rights, labour working conditions, equal opportunities, health and safety accreditation, maintenance and promotion of information security, fair trade, and acceptable corporate ethics.
- Recruitment Policy:** our policy reiterates that we use only specified, reputable employment agencies to source agency workers and always verifies the practices of any new agency it is using before accepting workers from that agency.
- Our values:** our values of Knowledge, Integrity and Action makes clear to our employees the actions and behaviour expected of them when representing Civica. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

## Approval

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This statement has been checked and approved by our Board of Directors, Civica Pty Ltd.



2 September 2022

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**Ben Cowling**  
*Executive Director, APAC*

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**Date**