

Systals Statement on the Prevention of Modern Slavery and Human Trafficking

At Systal, labour and human rights are a top priority. We are committed to treating everyone who works at or with Systal with dignity and respect. Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and human trafficking, and we are committed to acting ethically and with integrity in all our business dealings and relationships.

This statement is designed to meet Systal's reporting obligations under the Australian Modern Slavery Act 2018 and the UK Modern Slavery Act of 2015. Systal provides this statement for itself and on behalf of all its global subsidiaries. Systal and its subsidiaries share the same core business operations and supply chains, policies prohibiting modern slavery, and supporting processes further described in this statement.

The below statement covers Systals Financial Year 2023 ended December, 2023 and communicates Systal's policies and practices to ensure that slavery and human trafficking are not taking place in any of our supply chains or in any part of our business globally.

Organisation Structure

Systal are specialists in the provisioning of optimum data availability and data integrity in a robust secure environment to the delivery of enterprise class networking solutions.

From our Network Operation Centres, we provide our customers a first class Managed Service Solution. Our Services include: Managed Network Operations, Network Security Services, Network Solutions, Enterprise Network Services, Unified Comms, Professional Services, Hardware and Infrastructure Services, Project Services and Cyber Security Services.

Our services are managed from our UK Head Office and are coordinated locally through our network of sites in the UK, EU and worldwide.

Supply Chain

Systal source goods, resources and services from a global network of suppliers and partners. We continually evaluate how to identify and address risks in our supply chain, including those related to modern slavery and human trafficking. To map and mitigate risk, we use a variety of methods which allow us to undertake due diligence on our suppliers and ensure that we have appropriate policies and contractual terms in place, so that our suppliers understand the standards that we require of them. To the extent that should our suppliers not adhere to our standards, there can be material consequences, including the termination of our relationship with them.

Our policies on slavery and human trafficking

We recognise that there is scope for slavery within our supply chain and aim to address this risk. We want our customers to be confident that we, and our suppliers, treat their employees fairly, with respect for human rights and are not exposed to unsafe working conditions, or in any way forced to work under slavery.

Our internal policies illustrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Employee code of conduct

The company employee handbooks makes it clear to employees the actions and behaviour expected of them at work. The company strives to maintain the highest standards of employee conduct and ethical behaviour in all of its activities and in managing its supply chain.

Whistleblowing

Systal encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chain, of the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation.

Recruitment

As part of our recruitment process for employees and partners, we carry out checks prior to any person joining Systal, which include identity checks, reference checks, right to work checks, criminal record checks, and where applicable education and professional qualification checks. Our

Recruitment team looks for potential red-flags for modern slavery and follow up on any irregularities which may indicate that there is an issue.

Systal mainly uses its in-house recruitment team when sourcing labour, however, when required, Systal will use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. We conduct robust checks on any new employee including eligibility to work in country to safeguard against human trafficking or individuals being forced to work against their will.

Reporting

Our Modern Slavery, Anti-Slavery and Human Trafficking Policy contains guidance on how to raise any questions or concerns that our people may have about modern slavery in our business or supply chain. This can be via the individual's manager or via our whistleblowing procedures.

Due Diligence processes for slavery and human trafficking

We pay great attention to the appointment of new suppliers. It is our intention to only work with suppliers who can satisfy our standards with regard to labour and welfare conditions or have a commitment to achieve these standards.

As part of the onboarding process, suppliers are subject to approval and are required to complete a

Supplier Approval Questionnaire which assesses, amongst other things, their ethical trading standards, the modern slavery risks/issues present within their business and their supply chain, and what safeguards they have in place.

Within our supplier agreements, we set out clear standards of business conduct and ethics that we require our suppliers to abide by. Our supplier agreements provide us with the right to immediately terminate agreements by written notice to a supplier in specified circumstances, including any breach of our Modern Slavery, Anti-Slavery and Human Trafficking Policy.

Suppliers are only engaged when we are satisfied that safeguards are in place to prevent any modern slavery or human trafficking from taking place in their own operations or supply chain.

We have zero tolerance to slavery and human trafficking. We expect all our suppliers and contractors to comply with our values.

Risk Assessment

We will mitigate against the risk of modern slavery within our supply chain by working closely with our suppliers to ensure they understand our position and that they have adequate processes in place. We will also continue to review our policies and processes throughout the year.

Monitoring Effectiveness

Whilst a wider range of performance indicators will be considered in the future, the main method of monitoring effectiveness within the supply chain will be the pre-qualification criteria for suppliers, which includes a requirement to have measures in place to minimise the possibility of modern slavery in their business and supply chain. Whether or not an organisation publishes its modern slavery statement is a standard question asked in our onboarding process as part of due diligence before any supplier is set up.

Training

Key stakeholders within the business will receive appropriate training and have responsibility for developing and implementing company procedures relevant to the issue. Further and wider training will be provided as and when identified.

In 2023, all staff will be required to read and acknowledge the company's Modern Slavery, Anti-Slavery and Human Trafficking Policy. This will be repeated annually to ensure all staff are aware of their responsibilities.

Completion of mandatory training is monitored, and processes are in place to identify and address instances in which staff members have failed to complete.

2024 Modern Slavery KPIs

Supply Chain Management KPIs

1. Supplier Risk Assessments:
 - 95% of suppliers assessed for modern slavery risks.
 - Annual supplier audits.
2. Supplier Training and Awareness:
 - 95% of suppliers with anti-slavery policies

Internal Business Practices KPIs

3. Employee Training and Awareness:
 - 100% of employees trained on modern slavery
 - Bi-annual all employee training on Modern Slavery
4. Policy Implementation:
 - Annual review of anti-slavery policy.
 - Integration of modern slavery clauses in all contracts/

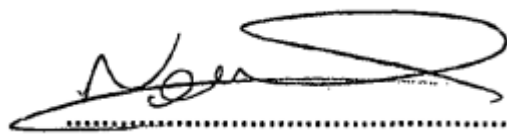
Effectiveness KPIs

1. Reduction in identified risks:
 - Percentage decrease in identified modern slavery risks: Measures the reduction in risks identified in the supply chain over a given period.
2. Improvement in supplier performance:
 - Percentage improvement in supplier audit scores: Tracks the improvement in audit scores of suppliers over time, indicating better adherence to anti-slavery practices.

By regularly monitoring these KPIs, Systal can better understand their effectiveness in combating modern slavery, identify areas for improvement, and demonstrate their commitment to ethical practices.

Neil Nicolson

Director, Systal Technology Solutions Ltd & Systal Holdings Ltd

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