

Modern Slavery Statement 2024

*This statement is submitted pursuant to the Australian Modern Slavery Act 2018 (Cth) sets out the actions taken by InfoTrack Pty Limited (**InfoTrack**) to address modern slavery risks in our business and supply chain for the financial year ending 30 June 2024 and will be reviewed and updated annually.*

Our Commitment

InfoTrack acknowledges that modern slavery remains a prevalent issue in the global community. InfoTrack is also aware that the impact of COVID-19 has increased the risks of modern slavery to many businesses on a global scale by placing unprecedented pressures on supply chains and increasing the vulnerability of workers.

A core value of the InfoTrack business is that we continually improve to be the best, and we are committed to maintaining ethical standards of conduct within our business activities and preventing acts of modern slavery from taking place within our supply chain.

This statement sets out our approach to preventing and addressing modern slavery risks in our organisation and supply chain.

Our Organisation

InfoTrack Pty Limited is a wholly owned subsidiary of ATI Global Limited (**ATIG**). InfoTrack and its subsidiaries operate as a leading SaaS technology innovator and has been the pioneer of e-conveyancing for over 20 years. We have over 350 employees across Australia with offices located in Sydney, Brisbane, Melbourne and Perth. We currently deliver legal technology solutions to over 8,500 clients in the legal, finance and conveyancing industries under the following brands:

- InfoTrack
- InfoTrackGO
- SettleIT
- Securexchange
- eCompanies

Our Supply Chain

InfoTrack primarily sources data directly from Australian Government agencies, Australian land registry authorities and other trusted third-party data providers to create aggregated reports and other products for our clients. To support our day-to-day operations, we also work with local suppliers to acquire office supplies, IT infrastructure, and other support services.

InfoTrack understands that the risks relating to suppliers will vary depending on their geographic location. While the majority of our direct suppliers are located in Australia, for any outsourced support services, we ensure that appropriate modern slavery provisions are included and agreed to in all relevant supplier contracts.

All suppliers are assessed based on merit, quality of goods and services and commitment to ethical work practices.

Policies

To combat forms of modern slavery we have implemented policies to be relevant to this area, including our Recruitment Policy, Whistle-blower Policy, and Employee Code of Conduct. These policies have been developed by key stakeholders in the business, approved by our board and published on our company intranet site.

In particular, our Whistle-blower policy has been designed to support a culture of corporate compliance and ethical behaviour by:

- encouraging employees to raise any concerns and report instances of Reportable Conduct where there are reasonable grounds to support such action, without fear of intimidation, disadvantage or reprisal;
- providing mechanisms for the reporting and investigation of reported matters;
- outlining the measures in place to protect a whistle-blower; and
- outlining the additional procedures and protections that apply to whistle-blowers under the *Corporations Act 2001* (Cth) in relation to the reporting of possible breaches of the Corporations legislation.

Our internal policies are reviewed and updated from time to time in accordance with evolving industry practices and in response to changes in legislation.

Modern Slavery Program

To identify and assess risks of modern slavery within our organisation and supply chains, we have implemented the following due diligence procedures, as part of an overall modern slavery program to combat modern slavery risks operationally and in our supply chain.

- Conduct preliminary assessments of suppliers based on geographical location, the product or services offered, commitment to combat modern slavery and social and environmental sustainability performance.
- Drafted a supplier operations questionnaire for the purpose of gathering information from suppliers to enable the proper review of modern slavery risk via annual assessments.
- Drafted a 'Supplier Code of Conduct', which sets out standards for our suppliers to adhere to with respect to human rights, workplace rights, and anti-bribery and corruption standards.
- Imposing contractual obligations on our Suppliers requiring compliance with our Supplier Code of Conduct, and our right to audit and assess supplier compliance.
- conducted all staff training module to ensure all relevant employees, particularly human resources and personnel involved in supplier procurement and management, are aware of our modern slavery risks and obligations under the *Modern Slavery Act 2018* (Cth).
- Commenced an initial assessment of InfoTrack's suppliers through the provision of a modern slavery questionnaire and Supplier Code of Conduct. We issued Due Diligence questionnaires to 20 of our Tier 1 Suppliers asking about their labour force and modern slavery risk indicators. As a result of this initial assessment, the identified risks of modern slavery did not require further mitigation or remediation beyond the existing measures implemented by InfoTrack as outlined in this Statement.

- **Due Diligence:** InfoTrack implemented improved modern slavery due diligence, within a broader environmental, social and governance assessment, which was issued to InfoTrack suppliers through our OneTrust cloud-based platform. The OneTrust platform has enabled us to apply a risk scoring/tiering framework to our vendor inventory, utilise an established Third Party Risk Exchange register and more efficiently automate our assessment and reporting processes overall.
- **Training:** A compulsory internal staff training module was launched and delivered to all InfoTrack employees. Completion of staff training was monitored and recorded, with employee comprehension of the material assessed by way of a post-training questionnaire. The training module aims to assist in enhancing employee understanding of InfoTrack's compliance obligations under the *Modern Slavery Act 2018 (Cth)* and how to identify and report any modern slavery instances or risks within our internal operations and supply chain.

Addressing Risks of Modern Slavery

In addition to continuing to adopt the above modern slavery program, during the period for which this statement applies we achieved improvements to our modern slavery program by undertaking the following actions:

- **Vendor Onboarding & Risk Management Process:** In order to further improve our supplier assessment processes, InfoTrack implemented a vendor onboarding process, via a vendor onboarding questionnaire and approval workflow within the OneTrust platform, enabling us to more accurately map our supplier data and as a result, better identify and manage our vendor risks, including modern slavery risks, in a more comprehensive manner.
- **Risk & Compliance Officer:** InfoTrack appointed a dedicated Risk & Compliance Officer within our AU Legal Team, reporting to our General Counsel. Some of the Risk & Compliance Officer's key responsibilities are to facilitate and manage the OneTrust vendor risk management processes, including our vendor onboarding workflow and modern slavery assessments, and to then track and remediate any identified modern slavery risks, allowing InfoTrack to comply with our ongoing modern slavery reporting and compliance obligations.

Modern Slavery risks within our operations and supply chains

InfoTrack acknowledges that modern slavery can be present in all industries, however we consider the risk of modern slavery occurrences within our internal operations to be inherently low due to the office based nature of our work, a higher skill level of workers and an absence of seasonal and foreign migrant workers. InfoTrack have not identified any instances or risks of modern slavery within our internal operations requiring mitigation or remediation.

InfoTrack's business activities do not directly intersect with high risk sectors and to date we have only identified one supplier which would be considered as an increased risk based on geographic location and the type of services provided, located in Vietnam.

InfoTrack recognises that certain geographic locations and types of services have a higher inherent risk of modern slavery as a result of known labour rights issues and vulnerable populations in those areas.

Mitigation: InfoTrack has implemented the following mitigation strategies in respect of our identified high risk supplier:

- This supplier has been audited via our due diligence assessment process and no instances or risks of modern slavery requiring remediation have been identified.
- We have conducted sites visits.
- Modern slavery provisions have been included in our supplier contract,
- the supplier has confirmed they have policies and procedures in place reducing risk of modern slavery, including Corporate Governance, Anti-Slavery and Employment policies, and they have agreed to comply with InfoTrack’s Supplier Code of Conduct.
- We will continue to conduct due diligence assessments upon this supplier in order to further identify and mitigate any instances or risks of modern slavery.

Our enhanced approach to managing modern slavery risks

In order to determine the effectiveness of the controls to address and mitigate modern slavery risks, InfoTrack are committed to undertaking the following measures:

<p>Ongoing Assessment</p>	<p>We will continue to conduct annual supplier reviews in order to assess our suppliers on their modern slavery risks. We intend on continue carrying out these assessments through the provision of our modern slavery questionnaires and Supplier Code of Conduct.</p>
<p>Improvement of Vendor Onboarding & Risk Management Process</p>	<p>Our newly appointed Risk & Compliance Officer will continue to improve and refine our vendor onboarding and assessment questionnaires, approval workflows and overall risk management processes within the OneTrust platform, including our modern slavery assessment process. Improved assessment processes will allow us to more accurately identify, manage and report upon our modern slavery risks within both our supply chain and organisation.</p>
<p>Remediation</p>	<p>We will continue to assess agreements for contractual obligations imposed upon suppliers, and update terms if these obligations are not present. Suppliers who do not agree with our Supplier Code of Conduct will be removed as an approved supplier, subject to the supplier providing their own code which is the same or substantially similar to InfoTrack’s values.</p>
<p>Training</p>	<p>We will continue to deliver our internal staff training module to all relevant employees. Completion of staff training will continue to be monitored and recorded.</p>

Internal Oversight

InfoTrack and the entities it owns and controls are managed centrally in our Australian operations, with shared governance, policies and procedures. Due to this centralised management structure, a formal consultation process related to the entities owned or controlled by the reporting entity was not required.

This Modern Slavery Statement has been prepared with the input of a range of senior stakeholders and has been endorsed by the board of directors of InfoTrack Pty Limited. The practical day-to-day operation of InfoTrack's modern slavery program is currently overseen by the InfoTrack Legal Team.

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) and was formally approved by the Board of Directors of InfoTrack Pty Limited, via resolution dated 16 December 2024.

A handwritten signature in black ink, appearing to read "Stephen Wood", written over a thin horizontal line.

Stephen Wood
Director and Chairman of the Board of ATIG and InfoTrack Pty Limited
16 December 2024