

Modern Slavery Statement 2022

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 2022 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 300 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
- secureexchange
- 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 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 previously drafted and 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.

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:

- **Due diligence:** 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, we did not identify any instances or risks of modern slavery requiring further mitigation or remediation.

- **Training:** Drafted an internal 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).

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:

Ongoing Assessment	<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, risk assessments.</p>
Implementation of OneTrust Platform	<p>In order to further improve, centralise and streamline our supplier assessment processes, during the next reporting period we intend to implement the OneTrust cloud-based platform. This will allow us to more efficiently map our supplier data and automate our assessment and reporting processes.</p>
Remediation	<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>
Training	<p>During the next reporting period, we intend to implement and deliver our internal staff training module to all relevant employees. Completion of staff training will 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 a circular resolution dated 30 May 2023.



Stephen Wood
Director and Chairman of the Board of ATIG and InfoTrack Pty Limited
30 May 2023