

iVvy Holdings Pty Ltd  
 ACN 138 782 206  
 (Company)

## Modern Slavery

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Title	Date Effective	Revision Status	Review Period	Next Review	Page
POL-HR-Modern Slavery	18 Sep 2022	0.1	5 years	18 Sep 2027	1 of 5

**TABLE OF CONTENTS**

<b>1</b>	<b>PURPOSE</b>	<b>2</b>
<b>2</b>	<b>SCOPE</b>	<b>3</b>
<b>3</b>	<b>APPLICABLE LEGISLATION</b>	<b>3</b>
<b>4</b>	<b>OBJECTIVES</b>	<b>3</b>
<b>5</b>	<b>SUPPLIERS TO IVVY</b>	<b>3</b>
<b>6</b>	<b>ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS</b>	<b>4</b>
6.1	<i>Contract Engagement</i>	4
6.2	<i>Expectations of Suppliers</i>	4
6.3	<i>Cooperation with client due diligence.</i>	4
6.4	<i>Ability for employees to raise concerns at Work</i>	4
6.5	<i>Training</i>	5
6.6	<i>Ongoing Assessment of the effectiveness of the actions taken</i>	5
<b>7</b>	<b>RECORD OF REVIEW</b>	<b>5</b>

**1 PURPOSE**

iVvy recognises that all businesses have an obligation to prevent slavery, slavery-like practices and human trafficking and will do all in its respective power to prevent slavery, slavery-like practices, and human trafficking within its business and within the supply chains through which it operates.

This statement addresses iVvy's obligations and compliance in relation to the 'Modern Slavery Act 2018 (Cth)' ('the Act') and equivalent legislation in the regions we operate, and highlights the steps we take to ensure there is no slavery or human trafficking occurring within the organisation or its supply chains.

Modern slavery can take many forms including the trafficking of people, forced labour, child labour, servitude, and slavery. As a leading global software as a service business supporting the marketing, incentives, conferences and events (MICE) industry, we take our responsibility seriously and are aware of the potential for iVvy or our customers being targeted by traffickers and unlicensed labour hire providers, in local jurisdictions where licensing is a requirement. Our own processes around employee/contractor engagement ensure our employees are alert to the signs of exploitation, so that we may take the necessary action promptly and effectively should it be identified.

Title	Date Effective	Revision Status	Review Period	Next Review	Page
POL-HR-Modern Slavery	18 Sep 2022	0.1	5 years	18 Sep 2027	2 of 5

## 2 SCOPE

This Policy applies to all employees (whether permanent, part-time, fixed term or temporary), contractors, consultants, secondees, volunteers, directors and other insiders of the Company and its wholly owned subsidiaries.

References in this Policy to the Company include references to iVvy Holdings Pty Ltd and all its subsidiaries. The Company will comply with all applicable legislative requirements and has expectations on our supply chain to similarly comply.

## 3 APPLICABLE LEGISLATION

All employees, contractors and visitors must observe, implement, and fulfil the organisations statutory obligations under the relevant legal Acts in the locations the Group work in. These include, but are not limited to:

- a) Australia - Modern Slavery Act 2018 (Cth) (the Act).
- a) United Kingdom - Modern Slavery Act 2015.

## 4 OBJECTIVES

The objective of this Policy is, as part of our commitment, to identify and eradicate slavery and human trafficking and to continuously assess and address modern slavery risks.

## 5 SUPPLIERS TO IVVY

iVvy has in place a process to undertake due diligence on our supply chain network to ensure compliance with legislative obligations, and such compliance forms part of our contractual relationship with suppliers.

We will use best endeavours to procure from our suppliers by contract that full compliance with the Act must be achieved. We will use best endeavours to separately require that any actual or potential risk of breaching the Act that suppliers identify in their own operations or supply chains are communicated to us. This information will be assessed and evaluated appropriately by senior members of iVvy management on an ongoing basis.

We contract with third parties who provide services to assist with the everyday running of our business, such as IT service providers and property management companies (who, for example, may provide cleaning services to our offices) as well as companies who provide supplies to our office network.

We acknowledge that by virtue of contracting with other parties, whether as a client or as a supplier, there is always some risk that may contribute to modern slavery practices. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant, and professional manner. We also expect our suppliers to promote similar standards in their own supply chain.

Title	Date Effective	Revision Status	Review Period	Next Review	Page
POL-HR-Modern Slavery	18 Sep 2022	0.1	5 years	18 Sep 2027	3 of 5

## 6 ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

### 6.1 Contract Engagement

iVvy ensures that compliance checks are carried out for all staff employed to provide services. We verify the identity of each worker and their right to work and audit the relevant modern award or enterprise agreement that a temporary worker is engaged under to ensure they are paid correctly in accordance with the relevant award or agreement.

### 6.2 Expectations of Suppliers

Suppliers are expected to abide by the relevant legislation, which includes specific reference to various matters including human rights, anti-bribery and corruption, and modern slavery and human trafficking, and suppliers should have in place a policy recognising, respecting, and protecting the human rights of their employees, those of their suppliers and business partners and the communities affected by the suppliers' operations.

iVvy's position, is that:

- a) Employees should be free to choose to work for their employer and to leave the company upon reasonable notice.
- b) All employees must be provided with a clear contract of employment, which complies with local legislation.
- c) All employees must be treated in a fair and equal manner and with dignity and respect.
- d) Any form of discrimination, victimisation, or harassment on any prescribed grounds under national, commonwealth, state or territory laws should be prohibited. This includes marital status, pregnancy, family responsibilities, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, religious belief, age, trade union activity or any other prescribed ground.
- e) All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions.
- f) All slavery and human trafficking laws must be complied with including, but not limited to, the provisions of the Act and any applicable state legislation. Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in Australia or elsewhere, both internally and within their supply chains and other external business relationships.

### 6.3 Cooperation with client due diligence.

Our clients operate in many industries and range in size from small businesses through to local subsidiaries of global groups. We also work closely with government departments and agencies across all jurisdictions.

Title	Date Effective	Revision Status	Review Period	Next Review	Page
POL-HR-Modern Slavery	18 Sep 2022	0.1	5 years	18 Sep 2027	4 of 5

#### 6.4 Ability for employees to raise concerns at Work

All iVvy employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through whistleblowing procedures. iVvy is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in compliance with whistleblowing procedures will be treated confidentially and without fear of retaliation. It is by receiving and evaluating feedback and maintaining a culture of compliance that iVvy can assess the effectiveness of its practices and procedures.

#### 6.5 Training

All staff within iVvy are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. We have undertaken to review our policies and procedures to ensure our colleagues have access to any additional information and support they may require regarding human trafficking, forced labour, child labour, servitude, and slavery. All employees will undertake training on modern slavery and human trafficking and this training is available to all employees to undertake.

#### 6.6 Ongoing Assessment of the effectiveness of the actions taken

We will undertake continuous and ongoing assessment of our supply chains by evaluating information we receive from our suppliers and to promptly act on allegations or findings of involvement in such practices.

We will also set up an annual review process whereby members of senior management will review our policies and procedures and our response to modern slavery.

### 7 RECORD OF REVIEW

0.1	18 Sep 2022	Initial	COO		
1.0					
1.1					

Title	Date Effective	Revision Status	Review Period	Next Review	Page
POL-HR-Modern Slavery	18 Sep 2022	0.1	5 years	18 Sep 2027	5 of 5