

## Modern Slavery Statement

For the FY23 Reporting Period

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#### Acknowledgement of Country

We would like to begin our Modern Slavery Statement by acknowledging the Traditional Custodians of the land on which our offices are located the peoples and nations listed below - and we would also like to pay our respects to Elders past and present.

> **Turrbal & Yuggera** Peoples

> > Kaurna

People

Wurundjeri People

People

Whadjuk

Gadigal People

Ngunnawal

People



#### About this statement

This Modern Slavery Statement is made in accordance with section 14 of the Modern Slavery Act 2018 (Cth) (**MSA**). This is our fourth statement made under the MSA. Our Statement also complies with the UK Modern Slavery Act 2015.

It is a joint statement made on behalf of Pacific Group Topco Pty Ltd (the group's ultimate holding company), and its subsidiaries. Together, we are Magentus During FY23, our group underwent a significant restructure. We brought together our global health software brands under the Magentus banner. The supply chain details of Magentus' health operations are on pages 12-14.

As part of the Magentus transformation, our well-respected Kapish brand has been given a fresh new look and is the hero of what we used to call our Enterprise Software division. Kapish's report is on page 15.

The Citadel Group as a brand and a company continues to operate, and still provides important professional IT services in its own name, through its Citadel People, Noventus and Gruden brands. Details are on page 16.

Our other Citadel division - Citadel Technology Solutions continues to offer award-winning services to its audio-visual services clients across Australia. Its segment is on page 17.

As with previous years, the Magentus Shared Service team provide support across the divisions and have their own section of our Statement on page 18.

## ♦ Magentus

## Kapish











### o1 Summary

## Magentus' Modern Slavery Summary

**\** 

We said we would do the following in FY23, and we did. Supplier monitoring – We have continued our open-source monitoring of key Tier 2/3 suppliers with whom we do not have relationship-leverage. This supplements our NGO report analysis and creates an additional level of assurance for our assessments.

NGO Reporting – Recent NGO Reporting updates in our key technology supply chain exposures have indicated some positive actions by our Tier 2/3 suppliers, especially in the area of worker voice.

Transparency – Magentus and Kapish have both become Supplier members of the global supply-chain reporting tool SEDEX. This enables the transparent sharing of supply chain data on a "one-to-many" basis.

Direct communication – This year we took the step of directly promoting modern slavery awareness within our sites and offices, so that those suppliers who visit our sites are made more aware of our reporting mechanisms and where to find more information on their rights.

Training improvements – In our last statement, we noted a drop in completion of our recentlycompleted awareness training. We have identified the cause of this and remediated it so that our training is now reaching its audience more extensively and effectively.

Risk assessments - We conducted new supplier ex-post reviews in FY23, focusing on any high-risk categories.

# Who We Are

### Magentus Group



Magentus Group is the umbrella brand for four different operating divisions:

- Health care (Magentus)
- Enterprise software (Kapish)
- Professional services (Citadel Group)
- AV technology (Citadel Technology Solutions)



Melbourne, Australia Headquarters



557 Employees in Australia



> \$190,000,000 Revenue (\$

## Magentus Group Structure and Operations





#### Statement Scope

This Statement is made on behalf of the group's ultimate holding company - Pacific Group Topco Pty Ltd (**Topco**), and its subsidiary companies set out in Appendix 1. In this Statement we refer collectively to all the group companies as 'Magentus Group', or the 'Group'.

This Statement is made for the period 1 July 2022 to 30 June 2023.

#### Group Operational Structure

- Magentus' operations are organised along geographical and specialism lines. Clinical Systems, Health Informatics and Patient Safety operate through Magentus APAC (formerly the Citadel Health business), and Magentus EMEA (formerly Wellbeing Software). Practice Management (formerly Genie Solutions) operates nationally.
- Kapish operates from the Group's Melbourne and Brisbane offices.
- Citadel Group Services has presences in Melbourne, Sydney, Canberra and Brisbane and works closely with government and commercial clients on major technology projects.
- Citadel Technology Solutions supports clients across Australia, leveraging Group office presences, and its own dedicated offices and warehouse facilities across the country.
- Magentus Shared Services provides support across the Group in areas such as Finance, IT, Security Operations, Legal, Risk and Compliance.

Details of the operations of each of these divisions can be found in Section 3 of this Statement.

### Magentus Group Structure and Operations

Magentus is arranged in five business divisions, with one shared services corporate centre

### 🗇 Magentus

- Anaesthetic Private Practice™
- Data Management Services
- Evolution vLab®
- Charm Evolution®
- Cris®
- Evolution vRis®
- Evolution vLab®
- Euroking<sup>®</sup>
- eQstats®
- eConsent™
- Gentu®
- Genie®

### Kapish

- Kapish<sup>®</sup> Content Manager Cloud
- K365 Cloud
- Kapish<sup>®</sup> Productivity Suite



- Audio-visual installations
- Secure unified communications



- Citadel People
- Noventus
- Gruden®

#### Magentus Shared Services

- Finance
- Enterprise IT
- People & Culture
- Legal, Risk & Compliance
- Security Operations

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Operational and Procurement Details



#### Magentus APAC Operations

Magentus' objective is to deliver better healthcare outcomes through world-class technology. Magentus APAC's Clinical Systems (Evolution vRis<sup>®</sup> and Charm<sup>®</sup>), & Patient Safety (eQstats<sup>™</sup>) software products were created and are maintained by its talented team of Australian-based developers and implemented by its Australian-based delivery teams. A matrix of other key roles are performed by employees within Australia, such as software and network support, cloud engineering, quality management, and training.

Approximately 160 employees work in Magentus APAC, primarily from our Melbourne and Brisbane offices. They are almost exclusively permanent employees whose employment agreements comply with all applicable Australian laws. Magentus is committed to being an employer of choice, and award-compliant salary makes up only a part of our comprehensive employee value proposition under the MyMagentus program.

Magentus Pty Ltd is the main contracting company for Magentus APAC operations.

#### Magentus APAC Supply Chain and Procurement

- Magentus APAC is responsible for its own supply chain activities. In respect of goods and services sold, this involves acquiring:
  - $_{\circ}$  computer hardware from Australian vendors for installation at customer premises;
  - $_{\odot}\,$  telecommunications services from Australian and UK telecommunications service providers;
  - Australian and UK private cloud data centre services;
  - $_{\circ}\;$  physical security services from local companies; and
  - cloud storage and cloud software services from Australian subsidiaries of major US cloud service providers.
- In respect of other activities, Magentus APAC procures:
  - employee education services;
  - marketing services (conferences etc);
  - $_{\circ}\;$  travel and accommodation services (travel agent, flights, car hire and hotels); and
  - contracts with specialist service providers (fax and SMS message services, helpdesk software and development software licences).

Magentus APAC has a relatively stable supplier base, with 85% of its spend directed at 11 Australian vendors. Of these, the top two are business forming part of a single hardware manufacturer, and the other a telecommunications provider. Both are Modern Slavery reporting entities. Magentus APAC also uses Magentus Shared Services.



#### Magentus EMEA Operations

The Magentus EMEA team are the developers behind our radiology and maternity Clinical Systems, CRIS<sup>®</sup> and Euroking<sup>™</sup> and our Patient Safety product, eConsent.

The team is geographically diverse, but operates out of our Mansfield, Nottinghamshire office. The Magentus Data Management team who deploy and operate our primary care health informatics business operate from our Sunderland office.

We have approximately 198 people in the Magentus EMEA division. These are almost exclusively direct employees whose employment agreements comply with UK employment and other requirements. They also have the benefit of our MyMagentus employee program.

Magentus EMEA contracts with its clients through product-specific operating companies: Magentus Software Limited, Magentus Maternity Software Ltd, Magentus Data Management Services Ltd, and Magentus EHR Solutions Ltd.

#### Magentus EMEA Supply Chain and Procurement

- Operationally, Magentus EMEA is responsible for its own supply chain activities. In respect of goods and services sold, this involves acquiring:
  - o computer hardware from UK vendors for installation at customer premises;
  - telecommunications services from UK telecommunications service providers;
  - UK private cloud data centre services;
  - physical security services from local companies;
  - o cloud storage services from US parent vendors with operations in Europe; and
  - cloud software services from US parent vendors with local operations.
- Magentus EMEA also acquires the Evolution vLab<sup>®</sup> product and related support from Magentus APAC in Australia.
- In respect of other activities, Magentus EMEA procures:
  - employee education services;
  - marketing services (conferences etc);
  - o travel and accommodation services (travel agent, flights, car hire and hotels); and
  - contracts with specialist service providers, such as helpdesk software and development software licences.

Magentus APAC also procures many of the services for local consumption that Magentus Shared Services provides to its Australian affiliates. However consolidation of supply relationships across the Group will gradually align major suppliers with a single group entity that will facilitate recharging on a consumption basis. Other than license fees paid to its parent in Australia, Magentus EMEA's material supplier categories are cloud hosting and professional services.



#### Magentus Practice Management

Magentus Practice Management (PM) is a software developer and owner. Magentus Practice Management Pty Ltd contracts directly with medical specialists and their practices to supply its locally-installed Genie<sup>®</sup> Practice Management Software (PMS) and its cloudbased PMS, Gentu<sup>®</sup>.

PM uses software frameworks developed in Europe and has one transactional support arrangement with an organisation based in the Philippines. This vendor has been scrutinised as part of the Group's risk management program.

Approximately 160 people work in the PM office in Brisbane and across Australia. These are almost exclusively permanent employees.

All permanent PM employees are paid above relevant award rates and have employment agreements that meet Australian legal requirements. PM employees also participate in the MyMagentus employee benefits scheme.

## Magentus Practice Management Supply Chain and Procurement

- Following its acquisition in January 2022, PM has continued to conduct its own procurement, but with a steady transition to group-wide purchasing arrangements in cloud computing and greater utilisation of the Magentus Shared Services division. Where PM is responsible for its own supply chain activities, this involves acquiring:
  - o software development services and software consultancy services from local companies;
  - o operational support services from local Australian and international vendors;
  - telecommunications services from Australian telecommunications service providers;
  - migration support services from a vendor in the Philippines; and
  - cloud storage and software licences and services from US parent vendors with operations in Australia.
- In respect of other activities, Genie procures:
  - leasing and cleaning services for its office in Brisbane, and real estate services for its Perth office;
  - o computer hardware from Australian vendors for internal use;
  - employee education services;
  - marketing services (conferences etc);
  - o travel and accommodation services (travel agent, flights, car hire and hotels); and
  - contracts with specialist service providers (sms message services, helpdesk software and software licences).

PM's key supplier categories are SaaS licences, cloud services, software and professional services.



#### Kapish Operations

Kapish is a leading software and IT services provider specialising in secure information management, and was formerly part of the Enterprise Solutions division. In FY23, Kapish was stood up as a separate division, with other elements of Enterprise Solutions forming part of the Citadel Group Services business.

Kapish trades through Kapish Services Pty Ltd and Kapish EA Pty Ltd. Kapish Services develops and maintains its own software that operates either independently, or as part of other software packages. Good examples of Kapish's proprietary software are the Kapish<sup>®</sup> Productivity Suite, and goTrimPro<sup>™</sup>, both of which provide productivity enhancements to a third-party product, Open Text's Content Manager (**Content Manager**). Support and maintenance is also provided for its own and thirdparty licensed products.

Kapish Services also operates Kapish<sup>®</sup> Content Manager Cloud, a market-leading secure cloud platform for Open Text Content Manager. Kapish can deliver Content Manager Cloud in several combinations to suit the customer's needs, but common services include establishing the cloud instance, setup or migration of Content Manager to the Cloud, as well as Content Manager training.

Kapish EA is a specialist part of Kapish and is the foremost reseller of the LeanIX enterprise architecture product in the Asia Pacific region.

There are approximately 50 Kapish team members split across the Melbourne, Sydney and Brisbane offices. In common with their colleagues in the other divisions, they are rewarded and paid in accordance with all applicable employment laws and awards.

#### Kapish Supply Chain and Procurement

• Operationally, Kapish is responsible for its own supply chain.

This involves the following typical acquisitions:

- $\circ$  software for resale;
- software components;
- graphic design services;
- $_{\circ}$  contract professional services; and
- uniform and promotional materials.

Kapish also procures travel and accommodation services (travel agent, flights, car hire and hotels), and uses Magentus Shared Services.

Kapish Services has a small and stable procurement base, with >85% of its spend with two key software vendors. In line with other divisions, Kapish's cloud services are acquired under the management of Magentus Group from US vendors or their local subsidiaries, using services located in Australia. Software is primarily licensed from the US and Europe. No installable products are shipped by suppliers to Kapish, or by Kapish to its customers.



Citadel Group Services was formed by the alignment of Magentus' key professional services operations – Gruden, Citadel People and Noventus.

#### **Professional Services**

The primary trading entities in the Citadel Group Services division are The Citadel Group Pty Limited, Gruden Pty Ltd, Noventus Pty Ltd, and filosoph-e Pty Ltd.

Professional Services provides specialist consulting and personnel services directly or indirectly to Australian government agencies and Australian corporations. The Citadel Group also provides certain managed services to the Australian government. These services align with Citadel's core business of secure information management. Professional services contractors are sourced from within Australia.

Gruden is a specialist software development house, specialising in complex bespoke projects, mainly for government clients. Its team specialises in developing and supporting cloud-hosted software. With client consent, Gruden is able to leverage offshore coding services from a supplier of long standing. Gruden's supply chain is stable, with 90% of its direct procurement spend with four vendors, of which one is an international cloud service provider's Australian subsidiary.

The approximately 30 members of the Professional Services team operate from Melbourne, Brisbane and Canberra.

#### Professional Services Supply Chain and Procurement

Operationally, Professional Services is responsible for its own supply chain. This involves the following typical acquisitions:

- software for resale;
- software components;
- graphic design services;
- contract professional services from Australian contractors; and
- uniform and promotional materials.

Professional Services also procures travel and accommodation services (travel agent, flights, car hire and hotels), and uses Magentus Shared Services.



As part of the restructure of enterprise and professional services, Citadel Technology Solutions (Citadel Tech) has been reestablished as a stand-alone operating division.

#### Citadel Tech Operations

Citadel Tech's key business operations are the design, supply, installation, maintenance and servicing of audio visual and video collaboration technologies across its key verticals of higher education, defence, health, and government.

Approximately 80 people work in Citadel Tech's operations, with the greatest number working from the division's Melbourne office and warehouse, with other operations from its Adelaide, Canberra and Matraville warehouses. All Citadel Tech employees are retained on contracts compliant with Australian law and are remunerated in accordance with applicable awards.

#### Citadel Tech Supply Chain and Procurement

Citadel Tech's key trading entity is Citadel Technology Solutions Pty Ltd. Operationally, Citadel Tech is responsible for its own supply chain activities. In respect of goods and services sold, this involves acquiring:

- software licensing for video and audio conferencing;
- audio-visual hardware (screens, projectors, speakers, microphones, computing hardware, switchgear etc), from local suppliers, sourced from major global manufacturers;
- cabling, connectors, brackets & other ancillary hardware required for audio-visual equipment;
- vehicles for delivery of goods and transport of technicians;
- qualified trades people for project or longer-term engagements;
- warehousing and storage services; and
- uniforms and promotional materials.

Citadel Tech also procures travel and accommodation services (travel agent, flights, car hire and hotels), and uses Magentus Shared Services.

Citadel Tech has a stable supply chain, with less than ten AV hardware suppliers making up around 60% of its procurement spend. All these vendors are either Australian subsidiaries of major electronics manufacturers (most of whom have detailed Modern Slavery disclosures and some of whom are subject to NGO reporting), or their authorised Australian distributors.

### Magentus Shared Services

#### Shared Services Operations

Shared Services describes three parts of Magentus' business.

The first is the Office of the CEO and the Board. This element of Shared Services manages the group's relationship with its owners (the shareholders), and the activities of its governing body (the Board of Directors of Pacific Group Topco Pty Ltd).

The second is the Corporate Centre, which means the shared services that support the other business units. This includes people & culture, finance, legal, audit, risk and compliance, security operations, property management, and corporate IT.

In this Statement, we refer to the second category of services as Magentus Shared Services. Except for Practice Management, and some Citadel Tech employees, all of Magentus Group's employees and direct contractors are employed through Magentus Group Services Pty Ltd.

The third part of Shared Services is customer facing. Because of the structure of many government panel and procurement arrangements, Magentus Group Pty Limited is a contracting party providing services to customers. It does not provide these services itself, but does so through its operating subsidiaries described above.

#### Shared Services Supply Chain and Procurement

- Magentus Shared Services division is responsible for procurement on its own behalf, and indirectly for other divisions that use its services. Approximately 80 people work in Shared Services. This involves the following typical acquisitions:
  - employee benefits;
  - recruitment services;
  - marketing services (corporate website) and corporate functions;
  - investor management services (including share registry management);
  - travel and accommodation services (travel agent, flights, car hire and hotels);
- professional services (non-executive director fees, audit, tax, external legal, other consultancy services);
- $_{\circ}$   $\,$  specialist cloud software services and security operations;
- enterprise software licensing;
- o accommodation services (leasehold property) including fitouts;
- utilities (commercial rates; heating, cooling, data connectivity and voice, water and sewerage; cleaning (although some cleaning is conducted by landlords);
- $_{\circ}$  postal and courier services;
- $_{\circ}$   $\,$  archiving and secure document destruction;
- $_{\circ}$   $\,$  security and alarm services;
- o computer hardware (laptops, desktops, mobile devices, printer/copier leases);
- tea, coffee, catering, (including vending machines); and
- $_{\circ}$   $\,$  office supplies.

Shared Services' top four procurement categories are (1) software/platform-as a service'; (2) rent and outgoings on leased premises; (3) professional IT services; (4) other professional services (legal, audit, cyber security and other consulting).

These services are predominantly obtained through Australia-based suppliers, though in the case of certain goods, countries of manufacturing origin may include China, Malaysia and Vietnam.

Preparing Our Statement

### How This Statement Was Prepared

### $\diamond$

#### Corporate Authorisation

Under its Constitution and Shareholders Deed, Pacific Group Topco Pty Ltd's Board of Directors is ultimately responsible for Magentus' management, and by virtue of its ability to control the boards of each of its subsidiaries, it is able to influence the conduct of activities by the subsidiaries.

The Board of Pacific Group Topco Pty Ltd and each of its wholly-owned subsidiaries have supported the cooperative engagement by entities covered by this Statement in the processes and activities it describes. There is effectively one management team across each of the UK and Australian businesses, simplifying the group's Modern Slavery activities.

#### Activities

The Group Company Secretary, with assistance from area specialists, has managed the process of preparing this Statement.

Due diligence activities have included:

- drawing supply chain data from financial systems;
- verifying and categorising the underlying use and nature of goods;
- analysing spend categories and volumes;
- assessing any new or revised publicly-available supplier statements compared to the prior analysis period;
- risk-assessing new suppliers during the reporting period;
- analysing updated NGO data on key suppliers;
- issuing and assessing supplier self-assessment questionnaires;
- conducting open-source intelligence gathering on risk-rated suppliers; and
- engaging consultants to assist in development activities.

Modern Slavery Risks in Our Supply Chain

## Modern Slavery Risks in Our Operations & Supply Chain

### **Risk Identification**

- Magentus Group's software development, professional services, consulting and advisory operations are conducted through the personal efforts of our own professional and trade-trained Australian and UK employees and some specialist contractors.
- We have a small number of long-standing overseas-based suppliers, including in a Tier 2 and Tier 2 Watch list country, though as reported in our last Statement, we remain satisfied that the services we acquire are unlikely to be exposed to Modern Slavery.
- For those team-members working on-site, we procure for them office space, communications and technology devices, and associated office-related products and services including cleaning, catering and beverages such as tea and coffee. Some contractors and employees work at client sites, and clients are responsible for some of these services.

- Modern Slavery risks exist in Magentus Group's supply chain. The greatest
  risks arise from goods that originate from heightened-risk countries and in
  heightened risk sectors (often these both occur simultaneously). These are
  third, fourth or even greater tiers in the supply chain, and assessment of
  these exposures is difficult. However, as noted in our prior Statement, we
  use NGO reports on these suppliers, augmented by an open-source tool
  developed by one of our consultants to monitor open source intelligence
  concerning these supply chains that will alert us to any meaningful reports
  of potential non-compliance activities.
- We have also activated a poster campaign in our offices to ensure that not only staff, but our higher risk suppliers of catering and cleaning services are alerted to their rights and can access our Whistleblower Hotline.
- Magentus Group has identified in Appendix 2 the key risks of Modern Slavery facing the Group. Magentus Group has also identified the key business unit or subsidiary with the most direct connection to these risks, and the "UN Guiding Principles" categorisation in terms of causation, contribution and direct linkage.



## Modern Slavery Risks in Our Operations & Supply Chain

### Risk Assessment

#### Departmental Guidance

• In assessing its Modern Slavery risks, Magentus Group continues to have reference to Table 6 of the Guidance for Reporting Entities issued by the Australian Department of Home Affairs (Guidance), and the Department's supplementary guidance.

#### NGOs

- Magentus Group has examined the latest reports from key NGOs involved in its higher-risk supply chain areas, specifically the 'Know the Chain' 2022/2023 Benchmark Study of ICT Companies and the specific assessments by KTC of Tier 1, Tier 2 or in some cases Tier 3 technology suppliers to the group. We have noted the changes in assessment methodology in the latest KTC report, and have adapted our assessments accordingly. We have noted a significant improvement in the rating of some of our key suppliers.
- Magentus Group has also had reference to labour exploitation analyses from NGOs such as the Walk Free Foundation. We have also referred to the United States Department of State Trafficking in Persons Reports for 2022 in conjunction with our self-assessment questionnaire template and risk scoring system.
- An uplift in the number of Magentus Group's suppliers that are required to provide Modern Slavery Statements has assisted the Group in assessing the approaches to addressing Modern Slavery of its larger suppliers. There has been a marked shift in the quality and presentation of Modern Slavery Information amongst some suppliers compared to disclosures made only 18 months ago in direct SAQs.



## Modern Slavery risks in our operations & supply chain



#### Actions Taken

#### Reinforce awareness

Modern slavery awareness training continues as a feature of the group's mandatory annual training. In the prior period, we observed that there had been a drop-off in completion rates for our revised training. Upon investigation we identified the underlying cause for this (a process, rather than content issue), and we are pleased that our training has now reached a much more satisfactory level of auditable completion.

#### Supplier rating and engagement

Magentus Group has not issued any additional SAQs this reporting period, as it has focused its efforts on analysing updated NGO reporting on major suppliers and conducting its direct contact campaign with higher-risk service provider groups.

#### Implementation of Supplier Code

Citadel's Supplier Code of Conduct incorporated through its Australian Purchase Order Terms and Conditions was used in almost 98% of FY23 purchase orders. The 2% variance is explained where a more substantive contract is in place, but Purchase Orders are still required.

#### Supplier monitoring

In the period, Citadel in partnership with its Modern Slavery consultant, has continued its Supplier monitoring system using a combination of opensource intelligence techniques to monitor distant-tier risk-weighted suppliers for Modern Slavery issues. We have identified no negative reports in the checks on our higher-risk Tier 2/3 suppliers.

### <sup>06</sup> Remediation

### Remediation – FY23 Metrics



#### For the reporting period, we identified the following metrics to test our progress.

#### Supplier Monitoring

We continued our custom open-source monitoring of key Tier 2/3 suppliers with whom we do not have relationship-leverage. This supplements our NGO reporting and creates an additional level of assurance for our assessments.

#### NGO Reporting

Recent NGO Reporting updates in our key technology supply chain exposures have indicated some positive actions by our Tier 2/3 suppliers, improving our confidence in those suppliers in key areas, such as worker voice.

#### Transparency

Magentus and Kapish have both become Supplier members of the global supplychain reporting tool SEDEX. This enables the transparent sharing of supply chain data on a "one-to-many" basis using unique supplier reference numbers. We anticipate a public release of these reference numbers on our website in the FY24 reporting year.

#### **Direct Communication**

This year we took the step of directly promoting modern slavery awareness within our sites and offices, so that those suppliers who visit our sites are made more aware of our reporting mechanisms and where to find more information on their rights – including our Whistleblower Hotline. We have had no reported enquiries, but we will continue to promote third-party awareness.

#### Training Improvements

In our last statement, we noted a drop in completion of our recentlycompleted awareness training. We have identified the cause of this as a process issue and remediated it so that our training is now reaching its audience more effectively. We have had over 94% completion for the reporting period, and even higher for our ethical sourcing policy.

#### **Risk Assessments**

We conducted new supplier ex-post reviews for FY23, focusing on any highrisk new suppliers to conduct reviews. No negative reviews were recorded.

## Remediation – FY24 Metrics



## For the next reporting period, we intend to use the following metrics to test our progress.

#### **Process Improvement**

As part of its membership of SEDEX, Magentus has had the benefit of additional analysis of its existing modern slavery processes, procedures and compliance activities. In FY24, Magentus Group will seek to improve its performance in these key areas and will engage with customers using SEDEX to develop better and ultimately best practice in areas not only of Modern Slavery, but also other ESG topics. Engaging with at least 50% of its SEDEX-connected clients will be the aim.

#### Further data sharing

Building on Magentus and Kapish's SEDEX experience, Citadel Group and Citadel Tech will prepare data for inclusion in the SEDEX index. Our objective will be to complete the data analysis and to make it available by the end of the next reporting period.

#### Level-up training

Magentus will maintain or update its Modern Slavery awareness training that is delivered across the Group. In FY24, it will also provide focussed training to key individuals who have a greater procurement involvement, specifically to raise awareness of our Modern Slavery Policy as it relates to procurement. Success will be measured by the percentage of procurement-focussed employees completing the training.

### Approval



This Statement was approved on 14 December 2023 by the Board of Directors of Pacific Group Topco Pty Ltd on its own behalf and on behalf of each of the entities identified in Appendix 1.

Mark McConnell CEO and Director Pacific Group Topco Pty Ltd

46/600 Bourke Street Melbourne VIC 3000 Australia

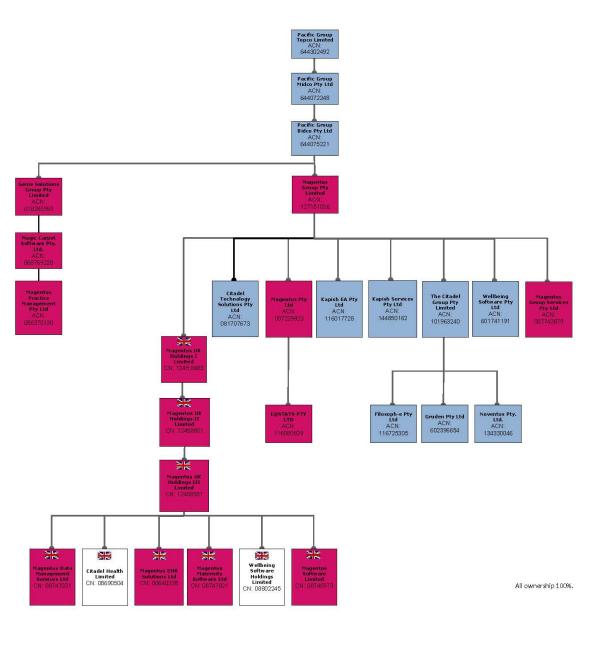
## Appendix 1

Magentus Group Structure



### Group Structure

Magentus group structure at the end of the reporting period.\*



\* Although Genie Solutions Pty. Ltd. did not change its name until after the end of the reporting period, the change has been reflected here for consistency with the remainder of this Statement.

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Magentus brands

### ♦ Magentus

Previously Citadel Health, Wellbeing and Genie Website to be announced

### Kapish

Previously Enterprise solutions www.kapish.com.au

### citadel group

Previously Citadel Services www.citadelgroup.com.au



Previously Citadel Services www.citadeltech.com.au









## Appendix 2

Magentus Supply Chain Risks

## Magentus Group Supply Chain Risks



Risk#	Risk	Proximity	Business	Linkage	Description
1	Extractive industries	Indirect	All divisions	DL	The following objects each rely on extractive industries for key components: AV technology products that Citadel Tech procures for its customers; computing devices (mobile and static) that Magentus and Shared Services procure for their own use; and the computing devices used by the cloud service providers used by Magentus, Citadel Group and Kapish.
2	Debt Bondage	Indirect	All divisions	DL	The products identified above may be sourced from countries such as Malaysia, where there is potential for migrant labourers to be coerced or induced into debt-bondage arrangements in production facilities.
3	Labour Exploitation	Indirect	All divisions	DL	The products identified above may be manufactured in factories in China where owners make extensive use of unpaid 'interns' under vocational training regimes.
4	Labour Exploitation	Indirect	All divisions	DL	The goods above and more generally are shipped to Australia and the UK. Although the Group has no visibility over shipping lines used there is a risk of shipment using ships registered under 'flags of convenience'. These vessels frequently have low labour standards and crew members cannot leave ships in foreign ports without permission or face the risk of immigration detention.
5	Textiles	Indirect	All divisions	DL	The affected divisions purchase small numbers of articles of clothing for staff use – mainly in promotional situations such as trade shows and while required under customer contracts. However in the reporting period due to the rebrand, there was a greater consumption of these goods. These may be sourced from countries such as Bangladesh, India, Pakistan and China; countries which have documented risks of child and forced labour.
6	Labour exploitation	Indirect	All divisions	DL	Through its landlords, and in some cases directly, the Group consumes cleaning and facilities maintenance services, sectors which (notwithstanding clear and strong labour laws in each country), rely in some cases on recent migrants to Australia and the UK, who can be vulnerable to exploitation.



Compliance Table

### Compliance Table



Mandatory criteria				
a)	Identify the reporting entity	3,9		
b)	Describe the reporting entity's structure, operations and supply chains.	9-18, 30		
c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	21-24, 33		
d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	21-27		
e)	Describe how the reporting entity assesses the effectiveness of these actions.	26-27		
f)	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	20		
g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant	N/A		

### Magentus Head Office & Magentus APAC

#### Melbourne, Australia office

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#### **Citadel Technology Solutions**

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