



# Modern Slavery Statement

FY2024

Securely Connected Everything™

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# Introduction

## About the statement

The Australian *Modern Slavery Act 2018* (Cth) (“the Act”) is a legislative framework designed to identify, address, and reduce the incidence of modern slavery in global supply chains. The Act established a reporting requirement for certain large entities (organisations), who are required to publish an annual Modern Slavery Statement that describes their actions to assess and address modern slavery risks in their operations and supply chains.

Modern slavery occurs in situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. It includes trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour, and deceptive recruitment practices.<sup>1</sup>

This statement is made as a submission under the *Australian Modern Slavery Act 2018* (the Act) by Orro Pty Ltd as an entity that meets the reporting threshold for the Act. This statement is made with respect to the financial year ending 30 June 2024 (“the reporting period” or “FY24”).

This statement sets out the steps that we have taken to assess and address the risks of modern slavery practices taking place within our operations or our supply chains during the Reporting Period. In this Modern Slavery Statement, the terms “Orro”, “the Company”, “our business”, “organisation”, “we”, “us”, and “our” refer to Orro Pty Ltd and the group of companies, except where the context otherwise indicates. The parent company for Orro Pty Ltd is Orro HoldCo Pty Ltd (Orro HoldCo).

Orro is a privately owned company, with an annual turnover of above AUD100 million. A full list of entities controlled by Orro HoldCo is listed on pages 5, 6, 7 and Appendix B. To find out more about Orro, visit our website:

<https://orro.group/>

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<sup>1</sup> *Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities*, Attorney-General’s Department (2024)

# Message from the CEO

Orro is an Australian technology company that specialises in the delivery of secure, end-to-end IT/OT Infrastructure services. Providing a range of professional and managed services across security, network, cloud and unified communications, our solutions deliver greater efficiency, performance and resilience to our customers.

**We want to ensure that as we deliver our services, no one is harmed in the process.**

According to the latest Global Estimates of Modern Slavery, fifty million people were living in modern slavery in 2024. These estimates, from the International Labour Organisation, Walk Free, and the International Organisation for Migration, indicate a rise in the number of modern slavery victims globally.<sup>2</sup> We recognise the collective responsibility for businesses to understand and address their areas of impact to mitigate harm to people, and to respect the human rights of all people our business touches.

In 2021, we took the initiative to produce a voluntary annual statement. It was important to us to begin our Modern Slavery journey early, and this prepared us well for writing our subsequent mandatory reports. We are committed to continuous improvement and understanding our human rights impacts in our operations and supply chain.

We are proud to launch our fourth Modern Slavery Statement that details our approach to understanding, managing, and addressing our modern slavery risks. This is the third year that we have met the threshold for mandatory reporting under the Act.

**Key progress made during the 2024 reporting year has included:**

- Strengthening of Orro's Whistleblower Policy, including the addition of options for disclosure for internal and external parties.
- Completion of an RFP process to identify a 3rd party service provider to facilitate independent whistleblowing disclosures.
- Implementation of a new whistleblowing platform.
- The Board and executive leadership team received independent training on the whistleblowing platform and their obligations.
- Embedded Modern Slavery briefing into the new hire induction briefing and ongoing attendance tracking.
- Continued work on broad policy review and refinement to reflect Environmental, Social and Governance (ESG) and Modern Slavery considerations.
- Implemented Unconscious Bias training to address equality for marginalized groups in partnership with JobAccess for the People & Culture team and Leaders/Emerging Leaders globally.

We welcome updates to the Act to drive Australian business accountability for modern slavery in their respective business activities.

This statement was approved by the Board of Orro.



Daniel Greengarten  
CEO

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<sup>2</sup> 50 million people worldwide in modern slavery, International Labour Organization (2022)

# About Orro

Orro Pty Ltd (ABN 72 111 999 663) is a proudly Australian owned Orro is an Australian technology company that specialises in the delivery of secure, end-to-end IT/OT Infrastructure services. Orro is registered in Australia at the address Suite 2, Level 11, 1 City View Road, Pennant Hills, NSW 2120.

Orro is a privately owned enterprise and a member of the Orro group of companies under Orro HoldCo Pty Ltd (Orro HoldCo), whose primary investor is Liverpool Partners (LVP) (ABN 61 159 465 1903).

While Orro Pty Ltd is the entity that meets the Modern Slavery threshold, Orro HoldCo is the ultimate parent company of this entity, and all other entities listed below. They are thus covered under this statement. The names of these entities are associated with our brand, and no other trading or brand names are associated with the Orro group of companies.

Entity	Type of entity	Activities	Location
Orro HoldCo Pty Ltd ACN 653 127 514 ABN 12 653 127 514	Holding Company	Ultimate Group parent company	Sydney, NSW
Orro MidCo Pty Ltd ACN 653 129 830 ABN 72 653 129 830	Holding Company	Does not conduct operations	Sydney, NSW
Orro FinCo Pty Ltd ACN 653 130 404 ABN 35 653 130 404	Holding Company	Does not conduct operations	Sydney, NSW
Cirrus HoldCo Pty Ltd ACN 632 826 030 ABN 96 632 826 030	Holding Company	Does not conduct operations	Sydney, NSW
Orro Pty Ltd ACN 111 999 663 ABN 72 111 999 663	Local Operating Entity	Main trading entity	Sydney, NSW
Cirrus MidCo Pty Ltd ACN 639 242 774 ABN 60 639 242 774	Holding Company	Does not conduct operations	Sydney, NSW
Comscentre Pty Ltd ACN 104 092 364 ABN 76 104 092 364	Local Operating Entity	Does not conduct operations	Brisbane, QLD
Comscentre (WA) Pty Ltd ACN 626 372 834 ABN 97 626 372 834	Local Operating Entity	Does not conduct operations	Perth, WA
Network Technology Capital Pty Ltd ACN 131 174 957 ABN 28 131 174 957	Local Operating Entity	Does not conduct operations	Brisbane, QLD
Comscentre Networks Pty Ltd ACN 149 833 732 ABN 31 149 833 732	Local Operating Entity	Does not conduct operations	Brisbane, QLD

e-Secure Pty Ltd ACN 086 248 419 ABN 48 086 248 419	Local Operating Entity	Does not conduct operations	Sydney, NSW
Infrasecure Limited Company number: 8091664	Fully owned subsidiary of e-Secure Pty Ltd	Cyber services	London, UK
RIOT Solutions Pty Ltd ACN 606 466 102 ABN 73 606 466 102	Local Operating Entity	Cyber and Network Services	Brisbane, QLD
NW Computing Pty Ltd ACN 600 642 402 ABN 37 600 642 402	Local Operating Entity	Public Cloud Services	Melbourne, VIC
Correct Solutions Pty Ltd ACN 059 444 576 ABN 16 059 444 576	Local Operating Entity	Does not conduct operations	Sydney, NSW
Correct DC Pty Ltd ACN 160 003 707 ABN 56 160 003 707	Local Operating Entity	Does not conduct operations	Sydney, NSW
COREDV Pty Ltd ACN 601 692 335 ABN 60 601 692 335	Local Operating Entity	Does not conduct operations	Sydney, NSW
Correct IT Pty Ltd ACN 160 003 529 ABN 14 160 003 529	Local Operating Entity	Does not conduct operations	Sydney, NSW
RedeemDR Pty Ltd ACN 161 136 554 ABN 59 161 136 554	Local Operating Entity	Does not conduct operations	Sydney, NSW
Mach Technology Pty Ltd ACN 115 162 564 ABN 58 115 162 564	Local Operating Entity	Does not conduct operations	Brisbane, QLD
Coloured Lines Australia Pty Ltd ACN 151 179 127 ABN 35 151 179 127	Local Operating Entity	Unified Collaboration Services	Melbourne, VIC
Noojee Contact Solutions Pty Ltd ACN 119 051 311 ABN 57 119 051 311	Local Operating Entity	Does not conduct operations	Melbourne, VIC
Noojee I.T. Pty Ltd ACN 087 329 744 ABN 40 087 329 744	Local Operating Entity	Does not conduct operations	Melbourne, VIC
Noojee Telephony Solutions Pty Ltd ACN 612 365 250 ABN 56 612 365 250	Local Operating Entity	Does not conduct operations	Melbourne, VIC

Orro NZ Bidco Limited Company number: 8940648 NZBN: 9429051640668	Holding Company	Does not conduct operations	Auckland, New Zealand
Liquid IT Limited Company number: 5862109 NZBN: 9429042105411	Foreign Operating Entity	Cloud, Network, Cyber Services	Wellington, New Zealand
Pudil Limited Company number: 8247681 NZBN: 9429049966336	Foreign Operating Entity	Legal owner of proprietary software	Wellington, New Zealand
Orro CI Pty Ltd ACN 678 312 546 ABN 25 678 312 546	Local Operating Entity	Critical infrastructure solutions	Sydney, NSW
Orro Group Philippines Inc	Foreign Operating Entity	Network Operations centre support based in Philippines	Manila, Philippines
Orro Cloud Philippines Corp	Foreign Operating Entity	Cloud and Security Operations centre support based in Philippines	Clark, Philippines

In the reporting period, Orro acquired two new companies, NW Computing Pty Ltd in Australia in October 2023 and Liquid IT in New Zealand in February 2024. The acquisition of these businesses allowed us to broaden and strengthen our public cloud capabilities and other service offerings, as well as expand our overall capability and customer base in New Zealand. Together they had 105 employees at the time of acquisition.

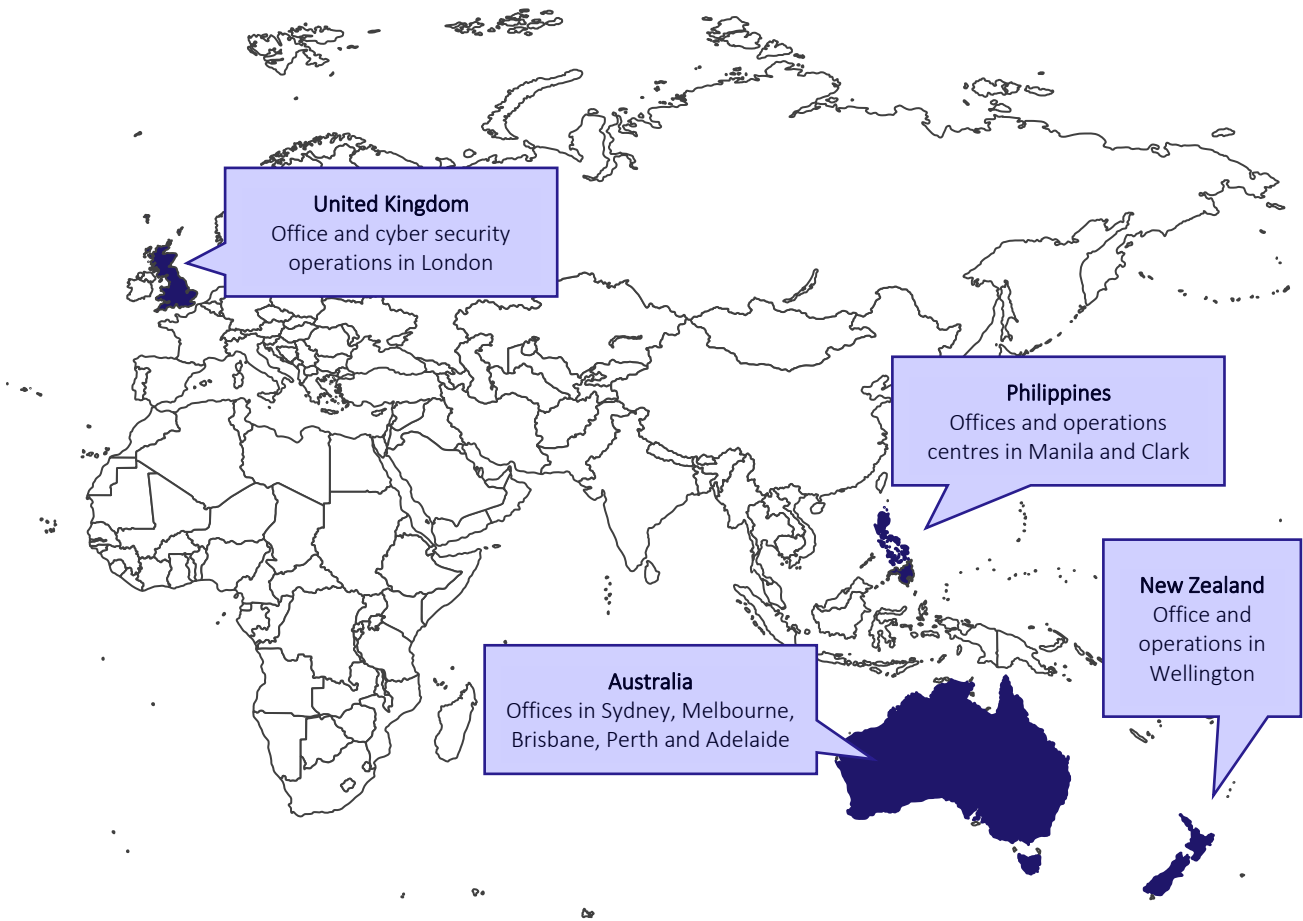
# Our Operations

Our operations focus on delivering customer business outcomes via technology. We assist our clients with the end-to-end installation, maintenance, management and operation of their digital network services, cloud infrastructure services, cybersecurity services, and digital workspaces. Our staff are responsible for delivering technical expertise to our clients, procuring technology, connecting equipment where necessary and delivering technical services. Our main business activities include the procurement of IT infrastructure and devices, the sale of IT products and services including technical support, and internal business support departments such as marketing, human resources, and finance.

## Our sites & work force

We have six offices in Australia, located in Melbourne, Sydney, Brisbane, Perth, Adelaide and staff working remotely from the Northern Territory and regional areas. We have direct employees working out of two international offices in the Philippines, located in Manila and Clark. We also have direct employees working from London, United Kingdom and now Wellington, New Zealand. Our operational footprint consists solely of offices that support digital service delivery. All our clients are based in Australia and New Zealand. As of 30th June 2024, Orro had 300 directly employed permanent workers and 49 temporary contract workers in Australia, 5 directly employed permanent workers in the UK, 224 directly employed permanent workers in the Philippines and 42 directly employed permanent workers in New Zealand.

Our offices and staff in the Philippines function as a supplement to our Australian services, operating as a service centre to provide technical assistance for our clients. All staff in our Philippines offices are direct employees of Orro and have technical expertise in technology solutions, including a finance team to support this function. Our staff in the UK are direct employees and similarly provide technical digital assistance (cyber security services) to our clients. Our UK staff provide a follow the sun or round the clock cyber security function for our clients based in Australia.





# Our supply chains

Most of the larger supplier relationships are held by the Orro Cloud and Network sales operations, support and the provisioning teams. They primarily constitute long-term relationships for the purchase of technology services and products e.g., technology hardware, software, office equipment, personal protective equipment, and services to support our operations and our clients' operations. Sourcing is primarily decentralised. Finance and contract teams and/or management must approve all procurement decisions. Other sourcing does take place via direct purchasing through delegated authority plus management approval and within policy.

We primarily purchase goods and services from Australia with local suppliers, but also have a small number of local suppliers across the Philippines, New Zealand and UK. In all cases, these are long-term stable supplier relationships, and they provide us data on the country of origin for products we purchase. We also purchase goods from some large U.S. and overseas suppliers located in the same country where we operate. These primarily relate to the technology industry. At this juncture, we have limited oversight of our Tier 2 supply chain. However, we are working with our suppliers to improve visibility of our full supply chain.

In addition to drawing from our previous risk assessment to assess and understand supplier risk factors, Orro carries out an additional less-formal step to research relevant media or available Modern Slavery Statements for our suppliers. This is to enhance our awareness of other supply chain risks and/or the supplier approach to managing their modern slavery risks. Orro does not compulsorily collect data on the origin of goods. At the beginning of FY25, we will start piloting our new Supplier Questionnaire to begin to collect and assess supplier responses.

## Products

We procure several products to assist our day-to-day operations, in addition to the procurement of tools and equipment on behalf of our clients and customers. These products include office equipment, personal protective equipment, computer and hardware devices and other IT electronics. Additionally, we procure non-tangible products such as cloud-based subscriptions, security software and other software licenses and subscriptions. The products sourced for distribution and installation with our clients include network equipment, computer and hardware devices and other hardware equipment.

Our main overseas procurement is for technology equipment for use by our employees based in the Philippines, New Zealand and the UK. This would consist of laptops, phones, computer monitors, headsets and mice. We do not procure products from overseas suppliers for our Australian operations. We predominantly procure products from up to four local suppliers in the Philippines for technology equipment used by our employees located in the Philippines. We also purchase technology equipment from seven suppliers and distributors for New Zealand employees and clients. For our UK based employees, we purchase technology equipment from one supplier based in the UK.

## Services

We outsource several services for suppliers, including cleaning, security, maintenance, labour hire, recruitment, courier and delivery, professional services, insurance, education, and training, business-to-business marketing and design, and travel services.

To ensure compliance with Australian, Philippine, New Zealand and UK labour legislation, we have contracted relevant human resources and legal responsibilities to employment relations and professional services partners in the respective countries. These arrangements support and enable our compliance with industry award and Fair Work legislation for Australia, as well as relevant legislation in the Philippines, New Zealand and the UK.

## Risks of modern slavery practices in our operations and supply chains.

Orro seeks to operate in a manner that respects the rights of all people who work for us, as well as those working in our supply chains or affected by our business. In our approach to identifying and addressing the risks of modern slavery, we

have utilised the definitions published by the International Labour Organization and Commonwealth Guidance, alongside the Act.

Consistent with the Act, our approach to modern slavery risk is to define it in terms of risk to people, rather than an entity risk, although these may intersect.

We are also guided by the UN Guiding Principles on Business and Human Rights (UNGPs),<sup>3</sup> which outline that an organisation's response to modern slavery risks in their value chain should be determined according to the potential impact of the human rights violation occurring, and the degree of the company's involvement in or proximity to the cause of the adverse impact. The closer a business is to the harm, the greater the obligation on the business to alleviate it.<sup>4</sup> The UNGPs also set out that businesses should seek to take responsibility for risks they are linked to, for example through supply chain practices.

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<sup>3</sup> [Guiding Principles on Business and Human Rights](#), United Nations (2011)

<sup>4</sup> *'Continuum of Involvement'*, UNGPs

# How We Measure Risk

In FY21, we conducted an evidence-based risk assessment to identify risks of modern slavery in our operations and supply chains. We deem the results of this risk assessment to continue to be relevant in FY24. We continue to procure substantially similar products and services from the same suppliers, and our major geographical operational presence remains relatively unchanged, with the exception of adding New Zealand. The principal change in our operations was the acquisition of NW Computing Pty Ltd, representing 63 staff in Australia and the acquisition of Liquid IT in New Zealand representing 42 staff. These acquisitions were to strengthen our public cloud business in Australia and our overall operations in New Zealand.

The significant shifts in our procurement of goods and services were the purchase of a new Australian-based ESG platform for Australia, the Philippines, New Zealand and the UK.

As a result, we consider that our risk profile in relation to modern slavery has not changed materially.

We recognise that external factors such as conflict or shifting behaviours in certain industries and countries of origin can also affect our risk profile. We aim to continue monitoring potential drivers of enhanced risk in our supply chain and operations, and to refresh our risk assessment as needed.

Our methodology for assessing modern slavery risks is outlined in 'Our Risk Assessment Approach'.

## Our Risk Assessment Approach

Our 2021 Modern Slavery Risk Assessment used operations and supply chain spend data, a self-assessment questionnaire completed by Orro internal staff, a qualitative review of Orro's management systems and processes, and a series of interview and workshops with key internal staff to identify where our activities and operations may be linked to modern slavery practices. This work culminated in the development of a Modern Slavery Action Plan, which continues to grow our response to addressing modern slavery risk.

The quantitative and qualitative analysis drew on reputable data sources, such as the Global Slavery Index (GSI)<sup>5</sup>, Global Rights Index (GRI)<sup>6</sup>, Trafficking in Persons Report<sup>7</sup>, List of Goods Produced by Child Labor or Forced Labor<sup>8</sup>, commodity research by Verité<sup>9</sup>, and per benchmarking by KnowtheChain<sup>10</sup>

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<sup>5</sup> [Global Slavery Index](#), WalkFree (2024)

<sup>6</sup> [Global Rights Index](#), International Trade Union Confederation (2024)

<sup>7</sup> [Trafficking in Persons Report](#), US Dept. of State (2024)

<sup>8</sup> [List of Goods Produced by Child Labor or Forced Labor](#), US Dept. of Labor (2022)

<sup>9</sup> [Research on Risk in 43 Commodities Worldwide](#), Verité (2017)

<sup>10</sup> KnowTheChain is an independent benchmark released biennially, scoring 49 major ICT companies against human rights performance indicators.

## Risks in our operations

The FY21 Risk Assessment determined that the modern slavery risk in our operations was as follows below. We provide the updated 2024 rankings for the ITCU - Global Rights Index<sup>11</sup> and Global Slavery Index – Vulnerability<sup>12</sup> for each of our operating locations.

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**Australia**

*Low risk*

Our operations in Australia are conducted in the professional services industry, with very clear and direct oversight of our workers and the contracts, conditions, and allowances they have. We acknowledge that the risk of modern slavery in Australia has increased per the 2024 GSI and that operating in Australia does not preclude modern slavery risk.

**GRI: 3: Regular violations of rights**

However, due to the low inherent industry risks and our compliance with the requirements of workplace laws in Australia, we consider the overall risk of modern slavery in our Australian operations to be low.

**GSI: 7**

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**Philippines**

*Medium risk*

The Philippines continues to be ranked by the ITUC Global Rights Index as one of the world's ten worst countries for workers. While we have direct oversight of the contractual arrangements with our staff in the Philippines, we recognise operating outside of Australia carries higher risks.

**GRI: 5: No guarantee of rights**

Orro has Australian oversight of our Philippines operations through multiple channels: members of the Orro Board act as directors of the Philippines employing entity, and our Philippines workers are engaged in direct employment contracts, not an outsourced organisation. Together, these enhance oversight and lower the risk of exploitative practices.

**GSI: 66**

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**United Kingdom**

*Low risk*

Employees in the UK are engaged in direct employment, which is deemed low risk due to the direct oversight we retain of working conditions and entitlements. The UK's ITUC – Global Rights Index rating is high, meaning there is a higher residual risk of modern slavery practices in our UK operations. Overall, we consider the modern slavery risk in our UK operations to be low due, as employees are directly employed and perform high-skill work.

**GRI: 4: Systematic violations of rights**

**GSI: 14**

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<sup>11</sup> The Global Rights Index, produced by the International Trade Union Confederation (IUTC) ranks countries on a 5-point scale according to the incidence of labour rights violations, as defined by the International Labour Organisation.

<sup>12</sup> The Global Slavery Index (GSI), produced by the Minderoo Foundation and WalkFree, measures the prevalence of modern slavery in countries on a scale from 1 to 100. The scale accounts for the vulnerability of workers and any governmental response to modern slavery risks.

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<p><b>New Zealand</b></p> <p><i>Low risk</i></p> <p><b>GRI: 2: Repeated violations of rights</b></p> <p><b>GSI: 8</b></p>	<p>Employees in New Zealand are engaged in direct employment, which is deemed low risk due to the direct oversight we retain of working conditions and entitlements. New Zealand’s ITUC – Global Rights Index rating is low, meaning there is a lower residual risk of modern slavery practices in our New Zealand operations. Overall, we consider the modern slavery risk in our New Zealand operations to be low due, as employees are directly employed and perform high-skill work.</p>
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Across all geographies we operate primarily within the professional and managed services industry, which has a low inherent risk of modern slavery. The majority of our workers are directly employed, meaning we have direct oversight of and control over their working conditions, and our workforce consists of a low percentage of foreign or visa workers, who tend to be more vulnerable to exploitation. We remain vigilant to ensure the rights of our workforce are respected in all our operating jurisdictions.

Since our FY22 statement, the ITUC rating for Australia had improved by one point. Since our FY23 statement there was a slight worsening in FY24 of .13 of a change. However, Australia is still considered low risk. The Philippines improved by .36 of a point, and the United Kingdom has improved by .32 of a point since our FY23 statement. The GSI Vulnerability score for all three countries has worsened since 2018. The GSI was updated in 2024 and has provided a refreshed insight into modern slavery risks in our countries of operation. The worsening of vulnerability to modern slavery in all countries, and worsening of GRI score in the United Kingdom, are important reminders to remain cognisant of the likelihood of modern slavery in our operations, regardless of the lower inherent risks in the industry we operate in.

# Risks in our Supply Chains

As noted in the preceding section, in FY2021 we analysed our supply chain spend to ascertain where modern slavery risks may be present, according to the categories of product/service risk, industry risk, and geographic risk.

If an issue became known to Orro through this process, we would seek to engage directly with the supplier to communicate our expectations, as set out in our policies, such as the Employee Handbook, Fair-Work-Information-Statement, Information Security Management System Policy, Anti-Bribery and Corruption Policy, and Environment and Sustainability Management Policy. Our Code of Conduct, Employee Handbook and our website also include information on our Whistleblower Policy, and different avenues to disclose. This applies to our suppliers, and covers topics including discriminatory acts or attitudes towards suppliers. During the reporting period, no such issues were identified.

## Procurement of goods

The FY21 Risk Assessment identified the following products as high-risk, in order of spend:

- Hardware – network equipment
- Hardware – laptops and portable electronics
- Stationery
- Office equipment

Information technology and communications hardware continues to be an area of focus for Orro. Consumer electronic goods have been named one of the highest risk imports to Australia according to the Global Slavery Index due to forced labour risks in the source country and throughout processing and manufacturing.

# Procurement of Services

The FY21 Risk Assessment identified the following services as high-risk, in order of spend. For the reasons outlined above, we deem the results of that risk assessment still accurate and relevant.

- Repairs and maintenance
- Industrial labour hire
- Cleaning services

These services were identified as higher-risk (based on inherent industry risks) because these sectors often involve subcontracting arrangements that obscure responsibility and accountability and tend to involve low-skilled work.

Orro's procurement of these services is typically through third-party companies that we have long-term partnerships with, which we believe reduces overall risk in these areas. However, we acknowledge that inconsistent regulation in the labour service industry in both Australia and the Philippines, as well as New Zealand and the UK, can render workers more vulnerable to exploitation.

Orro also subcontracts specialist technical roles from other similar technology companies in Australia. These services involve specialised, high-skill technical work, which lowers the inherent risks in these instances.

Our previous assessment, which included consideration of the salience, or potential likelihood and severity of modern slavery practices, also identified labour rights risk in services contracted in the UK as a priority. Due to COVID-19, Orro discontinued our lease of an office space and employees moved to 100% remote working, meaning Orro ceased to engage contracted services that had inherent modern slavery risks, such as cleaning and catering. Within this reporting period, the UK has started renting part-time office space through a co-working company, which is fully serviced.

COVID-19 disrupted the availability of consumer electronics and components required for our operations and supply to our clients. In response to these supply chain shortages, we purchased from alternate partners to be able to continue to service our customers. These new relationships were in the same geographical locations as previous suppliers. Orro has since resumed relationships with previous suppliers.

## Actions we take to address modern slavery risks

The insight and recommendations of the independent Risk Assessment and Gap Analysis conducted in FY21 continued to inform our approach in FY24. Following this assessment, we developed a Modern Slavery Action Plan ("Action Plan") and program of work that we continue working through.

### Modern Slavery Action Plan

In FY24, we continued implementing our Modern Slavery Action Plan through the following actions.

- Formalise grievance procedures for suppliers, contractors and staff.
- Train staff for the procedures for remediation within Orro's own operations and supply chain.
- Embed ESG and Modern Slavery criteria into the Merger & Acquisition process.
- Introduce over-arching ESG (including Modern Slavery) KPI for all staff.
- Company-wide training.

The table below shows our Action Plan, with the timeline and status of the program of work.

Planned	Task	Status
FY2021-22	Formalise 3 Year Modern Slavery Action Plan and gain commitment from executive leadership	Completed

FY2022	Communicate commitment to Modern Slavery Action Plan and continuous improvement to business internally	Completed
FY2022	Workshop and training for key personnel in modern slavery risks, gaps, and Modern Slavery Action Plan targets	Completed
FY2022	Explicitly mention modern slavery in grievance channel	Completed
FY2022	Check availability of grievance to PH staff and contractors	Completed
FY2022	Run due diligence checks for PH staff/ vulnerabilities	Completed
FY2022	Disclose results of our Modern Slavery Gap Analysis and defined actions in our FY2022 statement	Completed
FY2022	Speak up information on our website	Completed
FY2022	Have easily accessible information for responses to customers regarding how Orro addresses Modern Slavery Risk	Completed
FY2023	Leverage Sedex membership for risk identification	Completed
FY2023	Third party service provider to facilitate confidential whistleblowing reporting	Completed
FY2023	Introduce over-arching ESG (including Modern Slavery) KPI for all staff and company-wide training	Completed
FY2023	Formalise grievance procedures for suppliers	Completed
FY2023	Embed ESG and Modern Slavery criteria into the Merger & Acquisition process	Completed
FY2023	Train staff for the procedures for remediation within Orro's own operations and supply chain	Completed
FY2023	Introduce ESG and Modern Slavery KPI for Management Personnel (based on Modern Slavery Action Plan)	Completed
FY2024	Engage with potential and actual users (all countries) on the design, implementation and performance of the grievance channels	Completed
FY2024	Introduce online Modern Slavery training into the new hire induction process	Completed
FY2025	Group-wide Code of Conduct, reflecting human rights and salient ESG considerations separate to the Employee Handbook	In-progress
FY2025	Develop a standardised approach to engaging labour hire agencies across the business. Contracts for labour hire agencies could include information regarding modern slavery, transparency on wages, and any whistleblower or alert-line available to internal employees.	Planned
FY2025	Actively improve the approach to Modern Slavery due diligence	Planned
FY2026	Perform own SAQ/SEDEX SAQ at medium and high-risk Supplier organisations.	Planned

## Governance

Responsibility for managing modern slavery risk is assigned at the executive level as follows:

Organisational responsibility <b>for modern slavery</b>	Chief Executive Officer
Responsibility for <b>implementation of modern slavery actions</b>	Group Executives
Responsibility for actions to support <b>compliance with labour</b>	Chief People & ESG Officer



In FY2022, we established a cross-functional Modern Slavery Working Group (“Working Group”) that has continued to meet throughout FY2024 on a quarterly basis to review the modern slavery actions and program of work. The Board receives quarterly status reports on progress implementing the program of work. Membership of the Working Group includes Rachel Sands, Chief People & ESG Officer, Martin Dunn, Director Integration & Transformation, Monique Munnings, Program Manager and Miya Bradley ESG Consultant.

To support executive awareness, all ESG areas are reported to the Board on a quarterly basis, and Modern Slavery has its own section in these reports. We also report on ESG areas, including Modern Slavery, to LVP on a quarterly basis.

We have created a knowledge repository in our team workspaces, Confluence and Teams. The repository contains a section on modern slavery for our employees, including how to respond to customers’ enquiries about modern slavery and our approach. There were reduced instances of sales, service and relationship managers reaching out to the Modern Slavery Working Group due to the ease of information available. We continually checked and/or updated this space throughout FY24 on a monthly basis to reflect any new information or new supplier/client questions.

## Policies

Our business values diversity and will continue our progress in increasing the diversity of our staff across a range of different social factors. As we improve diversity, we will maintain our awareness of different linked risk factors to minority groups and worker vulnerabilities.

Employees are required to read and agree to our Employee Handbook, which outlines the rules and regulations, policies and procedures related to employment at Orro. The Handbook includes information on work hours, leave, benefits, grievances, and appropriate workplace behaviour expectations.

Orro has a **Whistleblower Protection Policy and Platform and an internal anonymous SpeakUp pathway** that creates a safe and confidential mechanism that can be used to report instances of wrongdoing, including modern slavery. Employees, contractors/suppliers, the employees of our contractors and suppliers, and the immediate family members, spouses and dependents of any of the preceding people are able to make protected disclosures under the policy. We publish information about how to make protected disclosures on our website. No complaints were received over the reporting period.

## Employment process

Orro’s hiring process involves due diligence in the form of police checks, right to work in the country, and visa checks, identity and proof of age, and in the Philippines, there are additional health checks.

Where Orro engages workers through labour hire or contractors, we undertake supplier due diligence, including verifying legal compliance (such as police checks, right to work and visa checks, identity and proof of age verification) and fair labour practices for each staff member. We have also moved to either direct payroll through our fixed-term contractors or manage this through a third-party partner to ensure workers receive their full and fair entitlements.

There is an increased risk of modern slavery risk in the Philippines compared to Australia, which is why Orro directly employs its workers in the Philippines as opposed to outsourcing. This enables us to ensure that employees receive their full legal entitlements, and to maintain direct oversight of working conditions.

## Case study: Onboarding Modern Slavery Training

In FY24 we introduced modern slavery training into the onboarding materials for all new employees. This covered ‘What is modern slavery?’, global statistics, online training on how to spot modern slavery in our supply chain, what to do if you suspect modern slavery and links to multiple resources and additional information. This training aimed to provide a foundational understanding of modern slavery, including its various forms, such as forced labour, human trafficking, and deceptive recruitment practices, which can occur both locally and globally. The program highlights the prevalence and risk of modern slavery within our industry, but also draws attention to vulnerable sectors and industries.

Since the introduction of this training, and providing re-training in the All Company townhall, almost all of our employees have now been exposed to the training and information.

By embedding modern slavery training into onboarding, Orro ensures all employees start their journey with us aligned to our commitment to ethical practices. This initiative reinforces our efforts to prevent and address modern slavery risks across our operations and supply chains.

## Procurement process and due diligence

Procurement at Orro is managed by different teams, including Sales Operations, Provisioning and business unit teams. They are led by different executives. Orro has selected partner and supplier relationships whereby Orro's Modern Slavery Committee has undertaken modern slavery research on major suppliers to understand their risks and their modern slavery action plans (where available). New suppliers undergo a preliminary evaluation, which includes assessing their alignment with Orro's values and compliance with relevant regulations and security. This evaluation has grown to include potential risks related to modern slavery, including a review of suppliers' modern slavery action plans, policies, and any public reports on their ethical practices.

Orro has implemented an ESG platform that allows us to send a supplier questionnaire covering Modern Slavery topics to better understand the potential modern slavery risks within their own operations and supply chains. An example of one of the questions include "Are workers free to terminate their employment at any time?" Orro is in the process of utilising this tool to assess prospective suppliers more effectively by gathering information about their ethical performance, including labor practices and potential human rights risks. Orro is also a member of the Supplier Ethical Data Exchange (Sedex) and is in the process of learning how to use this to assess prospective suppliers.

As described in the **Risks in our supply chains** section, we have identified equipment purchase as a high-risk category for modern slavery practices. Orro predominantly purchases equipment from large global companies. We are aware that we have limited leverage with these suppliers. During the reporting period, we continued to assess suppliers previously identified as high-risk and the identification and review of supplier modern slavery statements, available case studies and actions plans.

Currently, we do not compulsorily collect information about the country of origin of the materials we source, which limits our visibility of risks in those supply chains. In turn, this reduces our ability to address the modern slavery risks associated with raw materials used to produce the electronic good we purchase. To improve our capacity to assess these risks, during the reporting period, we undertook an exercise to research and review available Modern Slavery statements for our major suppliers to identify any concerns and understand action plans. We also continued to monitor press regarding labour relations to assess if our suppliers were associated with concerns and allegations. In addition, we commenced preparation of a supplier questionnaire, which we intend to further pilot and roll out in FY2025. The questionnaire distribution will focus on higher-risk suppliers first for where there are higher known industry risks. This approach will allow us to better assess the risk profile and understand our suppliers' approach to managing modern slavery and risks in their value chain.

## Grievance mechanisms and remediation

We are committed to providing and cooperating in remediation efforts to remedy instances of harm to people that arise from our business activities and relationships, in line with the UNGPs.

As described above, Orro has a Whistleblower Protection Policy that protects potential affected persons. Potential affected persons also include contractors and employees of contractors, and suppliers and their employees.

In FY2023, we engaged a third-party service provider to facilitate our confidential whistleblower reporting process and escalate grievances through a platform, Whispli. The third-party service provider also provided training to the Board and executive team on their responsibilities and obligations related to whistleblowing and grievance mechanisms. We communicated this partnership and how to use the service to our employees through a 'Town Hall' and have included it in induction processes for new employees.

If a complaint is received via the Whispli platform, a 3<sup>rd</sup> party team will conduct investigations independently of Orro. When a complaint is made, an automatic message is sent to the Discloser acknowledging receipt of their report. Orro's 3<sup>rd</sup> party provider will extract relevant information from the Discloser to allow Orro to make an informed decision whilst keeping the identity of the Discloser private. The 3<sup>rd</sup> party provider manages the process, reviews the report and responds to Discloser within 48 hours seeking any further information/clarification. They will assess risks, investigate and escalate Modern Slavery breaches. If there is no response from Discloser within 48 hours of seeking further information, they will prepare an assessment summarising the complaint, provide recommendations regarding next steps and submit in accordance with agreed protocols. They will manage the closing out the matter with the Discloser.

In addition, grievances can also be raised via Orro's SpeakUp avenue, which is then managed by Orro's Chief People & ESG Officer or Responsible Officer in an investigative process aligned to the Whispli process.

## Training

As part of our Whistleblower Protection Policy update, we provided training to staff on its operation, whistleblowing concerns, the grievance process, and our obligations to respond to complaints. The training included an overview of the policy, where it can be located, the difference between whistleblowing disclosures and work grievances and avenues available to raise a grievance. A majority of staff were briefed in an All-Hands company townhall in order to reach all teams and all levels. Whilst this briefing was not mandatory for all staff, it is mandatory and tracked in the case of new hire inductions.

As part of the development and implementation of our Action Plan, we delivered workshops to key personnel in the leadership team, Modern Slavery Committee and People, Culture & ESG team on understanding modern slavery, our modern slavery risks, gaps, and the actions we will take to close these gaps.

## Assessing the effectiveness of our actions

### Measuring progress in our Action Plan

During this reporting period, Orro's focus was on the ongoing implementation of actions in the Action Plan.

Throughout the reporting period, we were able to assess the effectiveness of our actions through the following methods:

- Our policies and procedures are all subject to a regular review process, which provides an opportunity to identify areas for improvement.
- The robustness of our Whistleblower grievance process and review of any issues raised via this mechanism resulted in no complaints or grievances received through the channels mentioned above. However, we understand that this does not guarantee that there were no incidents of modern slavery or human rights abuses in our supply chain or operations.
- Our Modern Slavery Working Group is the primary way we track our response to modern slavery risks. During FY24, this Group met quarterly to drive actions outlined in our roadmap, and track and review our progress. Progress on Action Plan achievements is monitored by the Board via quarterly ESG reporting.

## Consultation

### Internal consultation

Input to this Modern Slavery Statement was sought from Orro's Procurement, Integration, Operations and Legal teams and the members of Orro's Modern Slavery Working Group. We discussed details of the Act's reporting requirements, information about the actions we intend to take, and provided teams and the Working Group with relevant materials and updates.

The statement has been reviewed and signed off by the Modern Slavery Working Group, with final review and approval given to the board and CEO.

All of the owned or controlled entities listed in About Orro/Appendix B are governed by Orro's board. As such, each of these entities are subject to the same policies and expectations, and these are communicated throughout the business.

# Approval

## Principal governing body approval

This statement was approved by the Orro Board in their capacity as principal governing body of Orro December 2024.

## Signature of Responsible Member

This statement is signed by Daniel Greengarten in their role as the Chief Executive Officer of Orro on 16 December 2024.

A handwritten signature in black ink, appearing to read 'D Greengarten', is written over a horizontal line.

Daniel Greengarten  
CEO

# Appendix A: Table of Mandatory Criteria

Criteria	Description	Requirement	In this Statement
1	Identify the reporting entity	Entity is required to identify the reporting entity that is covered by the statement - this includes Entity owned and operated subsidiaries.	[Background], page 3
2	Structure, operations and supply chain	Entity is required to describe the structure, operations and supply chains of the reporting entity. During this process, the entity should specifically describe what components of their activities and relationships are categorised under own operations and supply chains.	[About Orro], page 5
3	Risk of modern slavery in your operations	Entity is required to describe the risks of modern slavery in its activities taken by to organisation. The entity is only required to identify how risks of modern slavery may be present in the entity's own operation; it is not required to report on actual cases of modern slavery. However, the entity can report on specific risks if it wishes to do so or include an anonymised case study	[ Risks of modern slavery practices in our operations], page 12
	Risk of modern slavery in your supply chain	Entity must report on the risks of modern slavery in the products and services that contribute to the entity's own products and services sourced in Australia or overseas. This extends beyond direct suppliers. Entity is not required to certify that their supply chain is 'slavery free' but rather, is required to identify how modern slavery practices may be present in their supply chain.	[Risks of modern slavery practices in our supply chains], page 14
4	Actions taken to address risks	Actions taken to assess and address the identified risks including due diligence and remediation activities; policies, training, reviews, grievance mechanisms etc.	[Actions we take to address modern slavery risks], page 15
5	Assessing effectiveness	As reporting years progress it is expected each annual statement will address how actions taken are being measured for effectiveness in remedying findings or causes of modern slavery. i.e. is transparency being upheld, spot checks conducted, is media being monitored for alternative information.	[ Assessing the effectiveness of our actions], page 19
6	Consultation	The internal consultation process in preparing the Statement must be described including chain of responsibility.	[Consultation], page 19

## Appendix B: Owned or controlled entities

Entity	ACN / ABN	Registered address
Orro Pty Ltd	111 999 663 / 72 111 999 663	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
Comscentre Pty Ltd	104 092 364 / 76 104 092 364	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
Comscentre (WA) Pty Ltd	626 372 834 / 97 626 372 834	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
Cirrus Hold Co Pty Ltd	632 826 030 / 96 832 826 030	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
Orro HoldCo Pty Ltd	653 127 514 / 12 653 127 514	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
Orro MidCo Pty Ltd	653 129 830 / 72 653 129 830	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
Orro FinCo Pty Ltd	653 130 404 / 35 653 130 404	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
Cirrus MidCo Pty Ltd	639 242 774 / 60 639 242 774	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
Network Technology Capital Pty Ltd	131 174 957 / 28 131 174 957	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
e-Secure Pty Ltd	086 248 419 / 48 086 248 419	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
InFrasecure Ltd. London, UK	n/a	
Orro Group Philippines Inc	n/a	
Orro Cloud Philippines Corp	n/a	

RIOT Solutions Pty Ltd	606 466 102 / 73 606 466 102	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
Mach Technology Pty Ltd	115 162 564 / 58 115 162 564	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
Correct Solutions Pty Ltd	059 444 576 / 16 059 444 576	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
Coloured Lines Australia Pty Ltd	151 179 127 / 35 151 179 127	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
Noojee Contact Solutions Pty Ltd	119 051 311 / 57 119 051 311	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
Noojee Telephony Solutions Pty Ltd	612 365 250 / 56 612 365 250	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
Noojee I.T. Pty Ltd	087 329 744 / 40 087 329 744	Suite 2, L11, 1 City View Road, Pennant Hills, NSW 2120
NW Computing Pty Ltd ABN 37 600 642 402	Local Operating Entity	Public Cloud Services
Liquid IT, New Zealand	Foreign Operating Entity	Cloud, Network, Cyber Services

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