

# Cirrus Networks

## Modern Slavery Statement

Reporting Period: 1 July 2020 to 30 June 2021

ABN: 98 103 348 947

**CIRRUS**

## **MODERN SLAVERY STATEMENT**

Cirrus Networks Holdings Limited  
Registered Office: Level 28, 108 St Georges Tce, Perth, WA 6000

### **Who are Cirrus Networks Holdings Limited (“Cirrus”)?**

Cirrus is an Australian owned and operated business incorporated in Australia and relentless on continued transformation, it is our mission to develop a lasting, growing and profitable managed technology solutions business through strong client engagement and the excellence of our people. We engage our clients via a consultancy approach and push technology innovation specific for the industry type. We don't have an off the shelf agenda and we're happy to design innovative solutions in unexplored territory. Our purpose is to deliver genuine client business improvement utilising best fit technology solutions, reached by understanding organisational drivers, challenges and budgets.

### **Our Work Force**

Cirrus employs over 150 employees with offices in Western Australia, Canberra, and Melbourne. Our workforce includes sales, presales, product, IT, finance, and a marketing teams that are mostly comprised of experienced and highly-skilled specialists which in turn lowers the risk of modern slavery risk occurring in our operations. Our team is a trained, professional workforce that is subject to the strong legislative frameworks of Australia. Our human resources department and the strong oversight provided by the Executive team allows us to screen, onboard and oversee employees in a manner that prevents modern slavery.

Employees are required to adhere strictly to our Code of Conduct as well as our other standards of practice and procedures to ensure that they, and Cirrus, act in an ethical and professional manner. Cirrus has a Whistleblower policy in place allowing employees to raise complaints or concerns (anonymously if desired) with the company's practices and access solutions for their resolution.

### **Whistleblower Policy**

We believe that every employee should have the chance to speak up anonymously when they see conduct not aligned to our corporate values or not in compliance with applicable law. Our Whistleblower Policy establishes the mechanism by which our staff can freely (and anonymously, if desired) report conduct that goes against the values and standards of Cirrus. This includes any concerns regarding modern slavery in our operations and supply chain.

### **Entities and Structure**

Cirrus is a reporting entity under s 5(1) of the Act. This statement is presented on a consolidated basis and Cirrus is reporting on behalf of the consolidated group.

### **Cirrus operations and supply chains**

Cirrus provides Australian customers with software, hardware network support with over 50% of its customer base within the government sector.

Our procurement from suppliers is predominately Australian based, with a limited amount of procurement directly from USA.

## **Policies and Protocols**

A major factor in our modern slavery strategy is our strong corporate governance and management oversight, most readily evidenced by the policies and protocols with which our employees are required to comply. These policies and protocols help us embed our anti-slavery principles in our company and ensure we carry out our mission to mitigate modern slavery in a consistent manner across our operations and supply chains.

## **Risk of modern slavery practices in operation and supply chains**

Cirrus has been undergoing a discovery process to map out its broad operations and overall supply chain structure. We intend to use this map and scoping exercise to identify the general sectors and industries procured, and any trends involved in procuring Cirrus's suppliers for its operations. From our initial scoping of direct suppliers, we have not identified any geographical risks which may contribute to modern slavery.

## **Ongoing actions to address risks**

Cirrus will prioritise our assessment and action in areas of our operations and supply chains which potentially may involve higher risks of modern slavery. This approach is based on the UN Guiding Principles for organisations to focus on the most 'severe risk' (a risk that would cause the greatest harm to people). We consider that services procured through certain international suppliers would have the higher risks.

The primary focus for the business will be to commence screening and undergoing reviews of international suppliers. As supplier contracts renew, we will ensure those renewal agreements impose a duty on our suppliers to ensure their practices do not incite risks to modern slavery, and include a *right to audit* and *Modern Slavery* clauses. This supports our responsibility under the Modern Slavery Act as an Australian business to safeguard that our supply chain is protected against modern slavery risks.

Additionally, the business will carry out due diligence and remediation processes which include:

- Where we consider it necessary, identifying and performing an internal audit of our current suppliers, specifically those procured overseas;
- Ensure supplier contracts are consistent with Cirrus standard *Supplier Agreement* terms where possible;
- Screening new/proposed suppliers in accordance with our corporate governance guidelines and internal supplier risk assessment;
- Introducing internal training on modern slavery and process for incident reporting.

## **Assessment of the effectiveness of these actions**

Over the first reporting year, Cirrus have developed the below Key Performance Indicators (KPI's) which provide a measure of effectiveness (in both qualitative and quantitative ways) in order to evaluate whether our primary aim has resulted in a decrease in modern slavery risks within our supply chain. We refer specifically to our due diligence and remediation processes when assessing these goals:

These specific KPI's include but are not limited to:

- The number of new suppliers which have included clauses around *modern slavery* and audit requirements;
- Completion of internal staff training, and how incident reporting processes have been implemented;
- Considering any trends in cases or risks reported;
- Review our *Risk Management Process*, what information is being drawn out of it, and any accomplishments of minimising risk to date.

As we are in the first reporting year, we do not consider we need to partner with an external auditor to undertake an independent review of our actions. We will continue to track our progress against these KPI's and consider whether this may change in the next reporting year

**On behalf of the Directors**



**Christopher McLaughlin**  
**CEO and Managing Director**

*This statement is made pursuant to section 13(1) of Modern Slavery Act (Commonwealth) 2018. It constitutes the statement of Cirrus for the year ended 30 June 2021 and was approved by the Board of Directors*