

MODERN SLAVERY STATEMENT

Centrepoint Alliance Limited
(ABN 72 052 507 507)

10 December 2024



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1. INTRODUCTION

This Modern Slavery Statement (**Statement**) is a statement by Centrepoint Alliance Limited ABN 72 052 507 507 (**Centrepoint Alliance, we, our, or the Company**) and its controlled entities, and has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (the **Act**).

Centrepoint Alliance is committed to ensuring we have effective policies and procedures in place to minimise the risk of modern slavery occurring within our business operations and supply chains. Centrepoint Alliance has a strong commitment to governance processes, risk management, corporate culture, safety and compliance. These underpin our commitment to a strong ethical and responsible approach to the conduct of our business operations.

This Statement sets out the actions that Centrepoint Alliance has taken to understand the potential modern slavery risks related to its business, and the steps it has implemented in the financial year ended 30 June 2024 (**Reporting Period**) to identify and prevent modern slavery in its supply chains.

2. CENTREPOINT ALLIANCE'S BUSINESS

The Centrepoint Alliance Group

Centrepoint Alliance and its controlled entities (the **Centrepoint Alliance Group**) operate in the financial services industry in Australia providing a range of financial advice and licensee support services (including licensing, systems, compliance, training and technical advice) and investment solutions to financial advisers, accountants and their clients across Australia, as well as mortgage aggregation services to mortgage brokers.

The Centrepoint Alliance Group holds four Australian financial services licences and one Australian credit licence. One of the Australian financial services licensees is the Responsible Entity for an IDPS-like scheme and a registered managed investment scheme, is the Operator of an IDPS and is the Promoter of a superannuation fund.

As at 30 June 2024, the Centrepoint Alliance Group provided technical, compliance and business management support services to approximately 549 financial advisers under its own licences and provided services to over 203 self-licensed financial practices covering 825 financial advisers. Centrepoint Alliance also employs 19 financial advisers who are appointed under its licences. The Centrepoint Alliance Group consists of a number of entities in the areas of Licensee & Advice Services, Funds Management & Administration, Corporate Services and Technology.

The below table includes all active entities that are 100% owned by Centrepoint Alliance.

Name	Principal Activity
Licensee or Advice Service	
Centrepoint Alliance Lending Pty Ltd	Mortgage broker/aggregator
Alliance Wealth Pty Ltd	Financial advice
Professional Investment Services Pty Ltd	Financial advice
Matrix Planning Solutions Limited	Financial advice

Name	Principal Activity
Associated Advisory Practices Pty Ltd	Support services to AFS licensees
LaVista Licensee Solutions Pty Ltd	Support services to AFS licensees
Financial Advice Matters Group Pty Ltd	Salaried advice
xseedwealth Pty Ltd	Salaried advice
Funds Management and Administration	
Ventura Investment Management Ltd	Packages managed funds and Responsible Entity
Corporate and Technology	
Centrepoint Alliance Services Pty Ltd	Trustee-employee share plan
Centrepoint Services Pty Ltd	Service company
Centrepoint Wealth Pty Ltd	Holding company
Professional Accountants Pty Ltd	Loans to advisers
Enzumo Corporation Pty Ltd	Technology service company
Enzumo Consulting Pty Ltd	Technology consulting services

During the Reporting Period, the Centrepoint Alliance Group engaged with approximately 320 suppliers. Centrepoint Alliance aims to establish a relationship of trust and integrity with all its suppliers, which is built upon mutually beneficial factors.

Centrepoint Alliance's Modern Slavery Governance Framework

Our objective is to ensure our authorised representatives and licensees provide the best financial advice and financial services to the Australian community. Our values and expectations are reinforced across the Company through various communication channels, policies and training.

The Centrepoint Alliance Board of Directors is accountable for the Centrepoint Alliance Group's audit risk and compliance framework. The Company's internal Modern Slavery Working Group reports to the Board through the Compliance Committee and the Group Audit, Risk and Compliance Committee.

The below graphic represents the geographical regions of our operations.



3. RISKS OF MODERN SLAVERY IN CENTREPOINT ALLIANCE'S OPERATIONS AND SUPPLY CHAINS

Centrepoint Alliance operates in the regulated Australian Financial Services environment, and within a highly regulated labour market with award safeguards for employees in most industries. As such, the risk of modern slavery in our operations on-shore have been assessed as low.

Operations

Centrepoint Alliance recognises that as a responsible company we must regularly assess our processes and identify any potential risk areas. Centrepoint considers it has a low risk of exposure to modern slavery practices because:

- Centrepoint Alliance does not have any offshore office arrangements;
- Centrepoint Alliance has implemented employment standards which meet or exceed the *Australian Fair Work Act 2009*; and
- all employees, advisers and suppliers are encouraged to report any concerns directly to Centrepoint Alliance via Centrepoint Alliance's Whistleblower Policy.

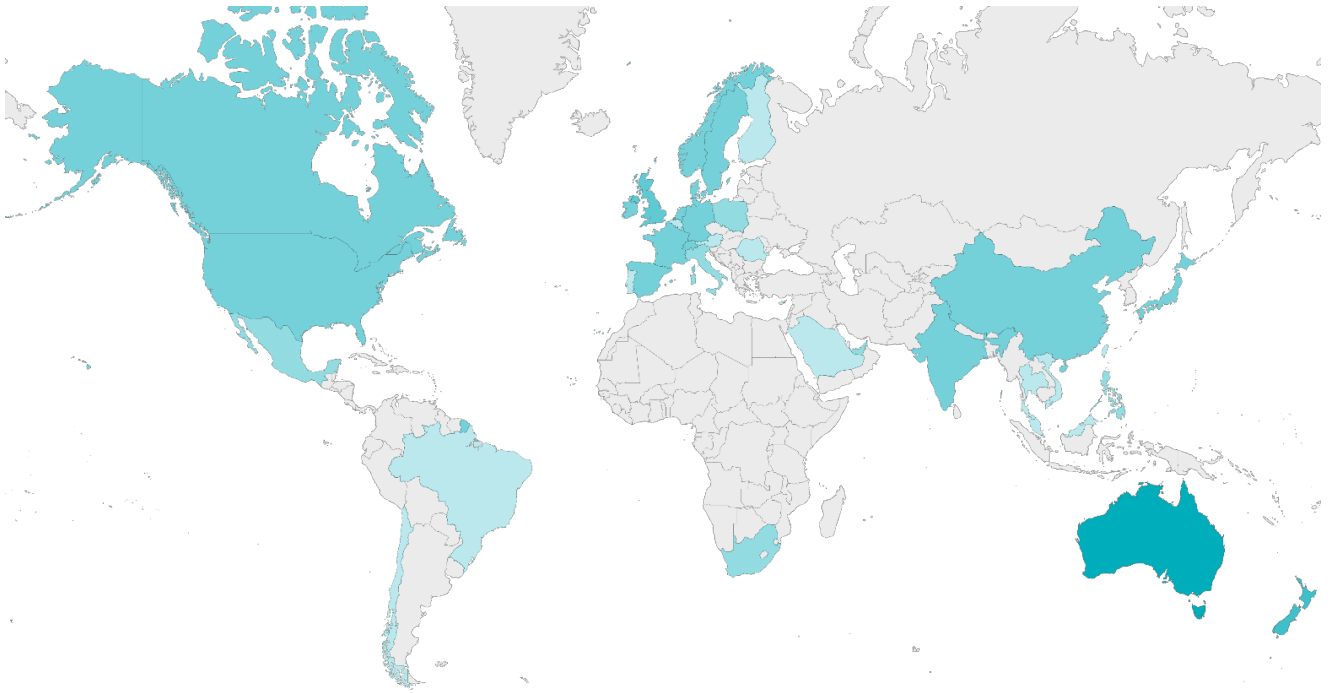
Supply Chain

Our suppliers operate, produce and source across several different sectors. Some of these sectors may be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the *Global Estimates of Modern Slavery 2022* publication. High risk sectors also include those in which child labour exploitation was identified in *Child Labour: Global Estimates 2020 Trends and the Road Forward* publication (ILO and UNICEF, 2021).

Our suppliers have been identified as operating in the following sectors:

- accommodation and food service activities
- administration and support services
- agriculture, forestry, and fishing
- arts, entertainment and recreation
- building services contractor
- cleaning
- construction
- education
- electricity, gas, steam and air conditioning supply
- finance and insurance
- government administration, defence and social security
- health and social work
- information and communication
- international organisations, diplomatic and consular services
- manufacturing
- mining and quarrying
- personal services
- professional and scientific services
- real estate
- retail
- transportation and storage
- water supply, sewerage and waste management
- wholesale.

Our suppliers operate in many locations across the world, as set out in the following graphic.



The below graphics show the high-risk sectors of operation, production, and sourcing for our suppliers who have participated in our assessment (it should be noted that our assessment was circulated to our top 20 suppliers with 12 suppliers participating). The numbers in the following graphics describe how many of those suppliers who participated in our assessment, are in the corresponding sectors, some operate in more than 1 sector.











High-risk Sectors of Operations









Retail

1

Production of goods in High-risk sectors

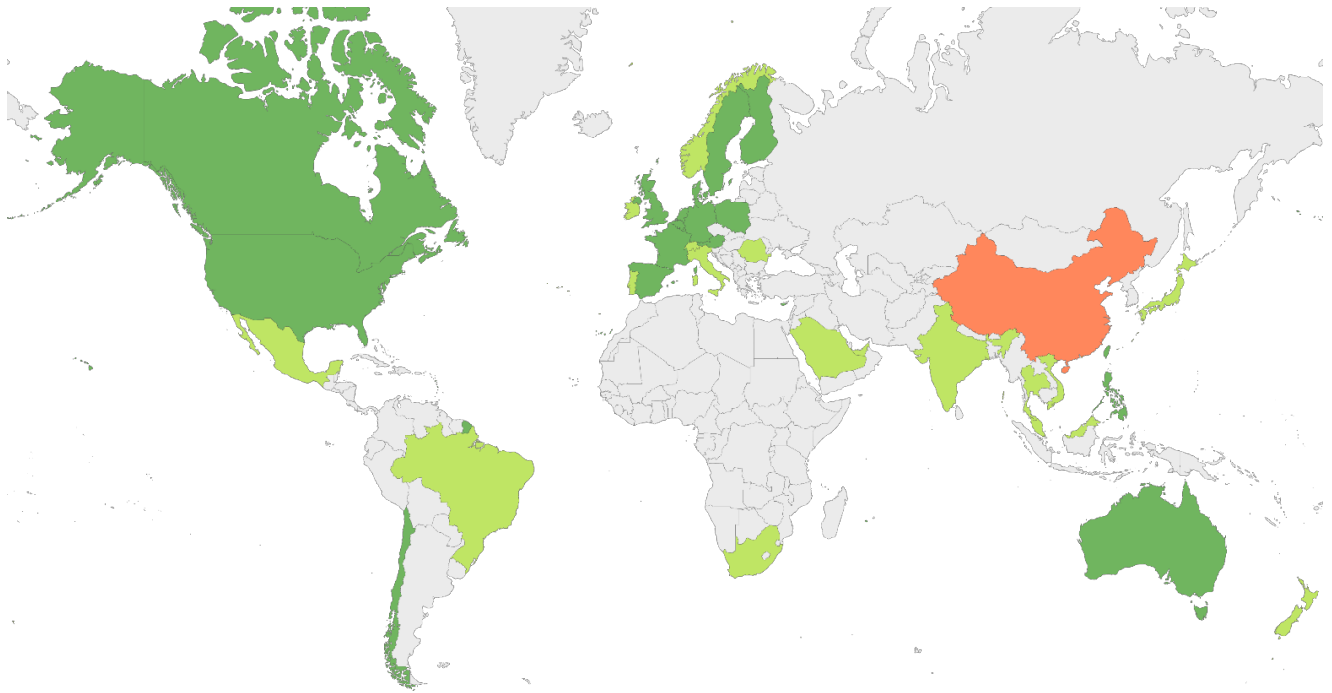
 Accommodation and Food Service Activities 2	 Agriculture, Forestry, and Fishing 2
 Building services contractor 1	 Construction 2
 Manufacturing 1	 Mining and Quarrying 2
 Personal services 2	 Retail 2
 Transportation and Storage 1	 Wholesale 2

Sourcing goods in High-risk sectors

 Accommodation and Food Service Activities 6	 Cleaning 2
 Personal services 2	 Retail 2
 Transportation and Storage 3	 Wholesale 1

Some countries or regions where our suppliers operate, as well as some goods produced and sourced by our suppliers, can be described as high-risk due to the possibility of a link to modern slavery practices such as forced labour, human trafficking, child labour, and debt bondage.

The geographical regions where our supply chain partners operate are shown in the map below.



4. ACTIONS TAKEN BY CENTREPOINT ALLIANCE TO ASSESS AND ADDRESS RISKS

Assess

Centrepont Alliance uses a third-party tool, the iPRO Modern Slavery Assessment Tool to assess modern slavery risks in our operations and supply chain. The risks identified in the previous section were all identified utilising this assessment tool. We engaged iPRO during the reporting period to conduct the assessments on our operations, and a bulk assessment of 20 of our suppliers. We intend to carry this process forward as an annual assessment of our operations and supply chain.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned one of the following risk categories:

- high-risk (high levels of inherent risk);
- high-risk (inadequate risk control);
- medium-risk (partial risk control);

low-risk (adequate risk control); or

low-risk (low levels of inherent risk).

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on geographical location, type of goods, industry sector and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool.

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

Centrepoint Alliance also completed a self-assessment using the same process to determine a risk category for our operations. Gaps identified in our operational modern slavery risk management will be considered for implementation of the recommended actions.

Address

Centrepoint Alliance conducts rigorous due diligence processes prior to engaging a new service supplier of material contractual value. Due to the size of many of our top suppliers, many of them qualify as reporting entities under the Act.

In addition, Centrepoint Alliance undertakes periodic reviews to obtain various assurances from its service providers including their employment practices.

Centrepoint Alliance will not support suppliers or contractors where we become aware, or where we have reasonable grounds to suspect, that slavery or human trafficking is taking place in their business or their supply chains.

Suppliers that completed the self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment.

Action items were also aggregated giving Centrepoint Alliance a focused view of the most impactful actions that could be taken by suppliers across the supply chain.

5. CENTREPOINT ALLIANCE'S ASSESSMENT OF THE EFFECTIVENESS OF ACTIONS BEING TAKEN

We utilise the benchmarking and KPI's in the iPRO Modern Slavery Assessment Tool to assess the effectiveness of our actions. As this is the first year using this platform to conduct our assessments and due diligence, we will be able to objectively measure the effect when the assessments are completed during the next reporting period.

The main KPI's we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process.

Each organisation who completed the assessment questionnaire was assessed and given the following two risk scores:

- Inherent Risk Score; and
- Unmitigated Risk Score

The Inherent Risk Score measures modern slavery risks that are intrinsic/built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors and high-risk goods are part of their operations, production or supply chain.

The Unmitigated Risk Score measures the organisations risk that remains despite the modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes and procedures in place to reduce modern slavery risks.

	Low-risk (No inherent risk) 2 Suppliers
	Low-risk (Adequate risk control) 3 Suppliers
	Medium-risk (Partial risk control) 6 Suppliers
	High-risk (Inadequate risk control) 1 Supplier
	High-risk (high levels of inherent risk) 0 Suppliers

We aim to continuously improve on these KPI's.

As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery actions to reduce the Unmitigated Risk Score by giving consideration to introducing relevant policies and procedures.

We also measure the effectiveness of our engagement with suppliers and will continue to encourage participation in our assessment program to better identify and mitigate modern slavery risks in our supply chain.

6. PROCESS OF CONSULTATION

The Centrepoint Alliance Board of Directors is the principal governing body of the Centrepoint Alliance Group.

All subsidiaries reporting into the Centrepoint Alliance Group operate under a common and consistent governance framework to build expectations and raise awareness when assessing and addressing modern slavery risks in its operations and supply chains.

7. OTHER RELEVANT INFORMATION

This statement covers the Reporting Period 1 July 2023 to 30 June 2024 and has been approved by the Board of Directors of Centrepoint Alliance Limited on 10 December 2024.



John Shuttleworth
Chief Executive Officer

Modern Slavery Reporting Criteria

Mandatory Criteria (section 16 of the Act)	Relevant section in Statement
The reporting entity	Section 1 - Introduction
Structure, operations and supply chains	Section 2 – Centrepoint Alliance’s Business
Risks of modern slavery practices in our operations and supply chain and any controlled entities	Section 3 - Risks of Modern Slavery in Centrepoint Alliance’s Operations and Supply Chains
Actions taken to assess and address those risks, including modern slavery due diligence and remediation processes	Section 4 – Actions taken by Centrepoint Alliance to Assess and Address Risks
How the effectiveness of actions taken were assessed	Section 5 – Centrepoint Alliance’s Assessment of the Effectiveness of Actions Being Taken
The process of consultation with owned and/or controlled entities	Section 6 - Process of Consultation
Any other relevant information	Section 7 - Other Relevant Information