

CORPORATE SOCIAL RESPONSIBILITY POLICY

Castlepoint Systems

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CEO's message

We are an Australian company, founded in Canberra, ACT, by Gavin McKay and me. We operate in Australia and overseas. We are a young, but rapidly growing company, and we have invested a great deal in defining our culture and philosophy as we expand and extend our reach.

Castlepoint Systems is committed to ensuring that our operations are conducted ethically, in accordance with applicable laws and best practices, and in the best interests of our clients, our community, and the environment.



Our vision is to make the world a better place, by changing the way organisations manage information, so that people, communities, and companies are safer and smarter.

As we grow, we are mindful of our core values – ethics, hard work and integrity.

These values underpin everything we do, and those we choose not to do. By maintaining a strong commitment to our founding values, we are committed to providing a consistent, best-practice workplace and market offering, maintain high customer satisfaction, and achieve our vision.

As we embrace new employees and a growing customer list, the Castlepoint values are applied throughout our every action. They are fundamental to our employment arrangements, customers, supply chain, our community, and our natural environment.

Rachael Greaves (CIP, CISA, CISM)
Chief Executive Officer, Castlepoint Systems

April 23rd, 2020.

Our organisation

Castlepoint™ technology provides command, control and compliance over all information, in every system, through a single pane of glass. Castlepoint reads, registers, classifies, and manages information from all systems in a network, using Artificial Intelligence. Organisations using Castlepoint can compliantly manage all of their holdings, without requiring users to change their business practices, or interface with a new system. Discovery is powerful and defensible. Records management, security, privacy and regulatory control happens transparently in the background, with automated application of requirements from Acts, Regulations and policies. Castlepoint doesn't require changes to existing information systems, or complex rules engines to be made and maintained.

This technology has given our clients the ability, for the first time, to apply compliant controls to their whole information environment. This leads to better outcomes for their stakeholders, as they are able to meet their obligations properly; become more efficient; access better quality information to support better decision-making; and better protect the privacy and security of the data they have custody of.

With our technology, our clients can use their information to have a positive impact and influence.

Looking after employees

We have committed to becoming an employer of choice, one that attracts likeminded, hardworking people through flexibility and other real, developmental benefits that improve the lives of our staff. We are a feminist company, and believe strongly in supporting men and women to take equal roles in the workplace and at home. We enforce pay equity, and pay superannuation throughout parental leave. We seek to employ people who represent community demographics, including younger and older people, indigenous people, migrants, people with a disability, and LGBTQIA+ people.

We have a formal Human Rights Policy addressing how we will support our staff, which is aligned to the following United Nations sustainable development goals (SDGs):

Good health and wellbeing: we support parental leave and are a breastfeeding-friendly workplace. We are vaccine-friendly, and support staff to be vaccinated by remunerating their travel time for appointments. We prioritise mental and physical health, and are a smoke-free workplace.

Quality education: We support our staff to continue their education, by sponsoring their training, certifications and volunteering where possible, and by providing flexible working arrangements to facilitate learning participation.

Gender equality: We seek to hire a balanced ratio of men and women in all types of roles. We enforce pay equity, and work to disrupt the many challenges women often face in the workplace, including gendered harassment, disrupted earnings and superannuation, and expectations of unpaid and emotional labour.

We also enshrine our commitment to the wellbeing of our staff in our:

- Anti-Bullying and Anti-Harassment Policy
- Employee Recognition Policy
- Equal Employment Opportunity and Anti-Discrimination Policy
- Flexible Working Policy
- Whistleblower Policy
- Work Health and Safety Policy and Procedures.

To help ensure that our employees can enjoy a high standard of living, we remunerate our employees at above Award wages, and slightly above the market rate for their skills, qualifications and experience level. We then invest heavily in our people with formal Development Plans, reviewed twice-yearly, committing to internal mentoring, paid training, and other development opportunities with a goal of continually increasing their marketability. As employee skills increase, we assign more responsibilities, and we then adjust their wages and titles upwards commensurately. We also support employees to develop skills and experience in areas not directly related to their roles if they have an interest in those types of development. We have a policy of salary transparency for all employees, including the Executive, to help combat unconscious bias and foster gender equality.

Castlepoint also supports our employees with an Employee Assistance Plan, and skilled HR professionals with experience in mental health and workplace cohesion. We support our staff to practice religious and cultural observance during work time using flexible working arrangements, and to be free of discrimination based on their beliefs.

We encourage communication between all areas of the business, and provide regular updates from the executive team on company activities and initiatives. We encourage two-way communication between employees at all levels and with the senior management team.



Looking after our clients

At Castlepoint we actively and comprehensively support our clients, to make sure that they have a positive and lasting impression of our product, employees and service, and to ensure they achieve maximum value out of our technology.

Customer satisfaction is at the heart of Castlepoint's activities and encompasses everything that we do. Castlepoint commits to delivering a high level of customer satisfaction at all times. Castlepoint staff are dedicated to performing their daily activities to this high standard, regardless of their job role.



We ensure the safety and quality of our products and services by following and documenting strict quality management and information security management procedures. We formalize this governance by complying with the international standards ISO9001 (quality management) and ISO27001 (security management).

We will always follow the rule of law in all jurisdictions we operate within. This includes by protecting personal and sensitive information from unauthorised access, use and disclosure; and by making our information available to those who request it where appropriate.

Our clients include law enforcement, defense, educational, and government organisations. In support of the mission of our own clients, and in alignment with our own vision and values, we do not engage with clients who operate in contravention of the rule of law, fundamental human rights, or environmental preservation. This includes controversial weapons, tobacco and tobacco products, gambling, materials for nuclear weapons, and fossil fuels. We also do not trade in contravention of the United Nations Security Council (UNSC) or Australian autonomous sanctions regimes.

Supplier standards

When selecting suppliers for our business, we apply our values of ethics and integrity. This means that we undertake due diligence to ensure that our supply chain is ethical (ensures the wellbeing of its participants and stakeholders) and operates in accordance with all applicable laws and regulations.

To ensure that we contribute positively to their wellbeing of workers in our supply chain, and do not participate in business practices that cause harm, we have developed a Modern Slavery Plan, which helps ensure that our supply chain does not:

- include child or forced labour
- include workers who are not protected or reported in their roles, and who do not have adequate benefits or wages
- prevent workers from forming or participating in trade unions
- ensure fair and equal treatment and access to opportunity, and enjoy a work environment free of discrimination, harassment, intimidation or coercion relating directly or indirectly to protected attributes
- protect worker health and safety
- provide workers with access to fair procedures and remedies.

We recognise our potential role in perpetuating foreign corruption, fraud, bribery, terrorism and crime if we do not carefully evaluate, assure and monitor our supply chain. We will never pay bribes or choose to participate in corruption or money-laundering. We will not buy or sell services or products from or to companies engaged in human rights abuses.

We seek to use local suppliers; Small to Medium Enterprises; minority-led businesses; Indigenous businesses; and suppliers who share our values and enshrine them in their own documented policies.

We commit to fair and equitable trade with our suppliers, including on-time payment and adherence to all contractual terms.

Protecting the Environment

Castlepoint is committed to protecting our natural environment. To this end, our business recycles waste in accordance with government recommendations, and makes sustainable procurement decisions, including reclaimed or recycled goods where appropriate.

We are committed to being a carbon-neutral company, and we undertake carbon accounting. We offset our carbon emissions for all flights and vehicles using Greenfleet, and buy credits to offset emissions arising from all other purchases per our accounting system. Our disaster recovery site is powered by solar energy.

We minimise unnecessary emissions by supporting remote and flexible work, to minimise unnecessary commuting and travel. We prioritise online meetings and conferences with clients to limit travel interstate and overseas.

Our company does not invest in or otherwise support fossil fuel interests. We donate 1% of profits to climate change and other environmental causes, and we provide free or discounted licenses to not-for-profit environmental organisations.



Community Engagement

Beyond our business, clients, and suppliers, we are part of a wider community. We take active steps to support that community.

We provide paid internship and project placement opportunities for university students from Canberra and interstate, to support their learning outcomes. We have a focus on employing local administrative, technical and support staff, and source graduates from university and government-led initiatives to join our company and be provided with paid continuous education to further develop their skills.

We contribute to communities of practice and other community organisations, including by volunteering. We encourage all staff to volunteer for causes they support, and provide flexible work arrangements to facilitate this. We offer corporate giving as part of employee recognition.

We are committed to engaging with the Indigenous and Torres Strait Islander community as part of our Reconciliation Action Plan. We participate in National Reconciliation Week and NAIDOC Week, and partner with Indigenous enterprises.

Measurement

We measure progress against our corporate social responsibility commitments in the following ways:

Employees

We measure our staffing diversity, pay equity, remuneration comparative to the industry, and staff satisfaction.

Clients

We measure our compliance with client contracts, our customer satisfaction, and our data security control of any client data we transmit or store (including personally identifiable information).

Suppliers

We measure our supplier conformance with anti-bribery, fair trade, human rights, modern slavery, and our ethical business engagement (including indigenous, local, SME, and minority-led businesses).

Environmental sustainability

We measure our carbon emissions and contributions, and our recycling outcomes.

Community

We track our positive contributions to human rights, graduate employment, reconciliation (as part of our Reconciliation Action Plan), and our charitable giving and volunteering.

Corporate Social Responsibility Summary

We look forward to working with clients, suppliers and partners who share our values and vision. We are a progressive, feminist company with a strong focus on justice, rule of law, equality and sustainability.

Through our commitment to looking after our employees and clients, and to applying strong due diligence to our supply chain, we hope to make a positive impact on our environment and the community, in Australia and overseas.

We commit to measuring our progress on our corporate social responsibility plans and commitments, and to being accountable for our ongoing evolution.