

2022

GS007 AUDIT REPORT

Service Organisation Controls Report

ASAE 3402 Type 2

1 July 2021 – 30 June 2022

This report, including the description of tests of controls and results thereof is intended solely for the information and use of BoardRoom, user entities of the BoardRoom's system related to during some or all of the period, and the independent auditors of such user entities, who have a sufficient understanding to consider it, along with other information including information about controls implemented by user entities themselves, when assessing the risks of material misstatements of user entities' financial statements. This report is not intended to be and should not be used or relied upon by anyone other than these specified parties.

Table of contents

I. Executive Summary	4
II. Statement by the Service Organisation	8
III. Description of the System accompanying the Statement by the Service Organisation	11
IV. Independent Service Auditor's Assurance Report on the Description of Controls, their Design and Operating Effectiveness	20
V. Overview of Work Performed	24
VI. Control Objectives, Control Activities, Testing of Design and Implementation and Operating Effectiveness	29
VII. Other Information Provided by the Service Organisation that does not form part of our Opinion	63

Section I: Executive Summary

Section I: Executive Summary

Overview

This report has been prepared to provide customers (or “users”) of BoardRoom Pty Ltd (BoardRoom)’s securities registry services with a description of its system of internal controls. The system, or internal control environment, is an essential component of an organisation’s governance structure. The objective of an internal control system is to provide reasonable, but not absolute, assurance as to the integrity and reliability of the financial information, the protection of assets from unauthorised use or disposition, and that transactions are valid. The management of BoardRoom Pty Ltd have established and maintained an internal control system that monitors compliance with established policies and procedures.

This report will be provided to relevant users and their auditors, who have a sufficient understanding to consider it, along with other information including information about controls operated by users themselves, so they may assess the risks of material misstatements of users’ financial reports. It may be provided to others as authorised by BoardRoom and Deloitte Risk Advisory Pty Ltd.

Scope

The scope of this report includes the description of BoardRoom’s securities registry services system for processing customers’ transactions throughout the period from 1 July 2021 to 30 June 2022 (the description), and on the design and operating effectiveness of controls related to the control objectives stated in the description.

This report has been prepared in accordance with Australian Standard on Assurance Engagements 3402 *Assurance Reports on Controls at a Service Organisation* (“ASAE 3402”). ASAE 3402 conforms with the International Standard for Assurance Engagements 3402 *Assurance Reports on Controls at a Service Organization* (“ISAE 3402”).

The control objectives in this report are directly referenced from Guidance Statement GS 007 Audit Implications of the Use of Service Organisations for Investment Management Services (“GS 007” or “the Guidance Statement”), issued by the Auditing and Assurance Standards Board in Australia.

The specific controls set out in Section VI of the report have been designed to achieve each of the control objectives. The controls have been in place throughout the period from 1 July 2021 to 30 June 2022 unless otherwise indicated.

Specifically excluded from the scope of the auditor’s procedures are complementary user entity controls, that is, controls assumed to be implemented by customers for stated control objectives to be met. Also excluded from the scope of the auditor’s procedures are other services provided by us not described in the description of the system.

Budget Mailing Service (BMS) and Data Transfer Services (DTS) are subservice organisations which provide printing and mailing services, which form part of the system used by BoardRoom’s customers. Optus and Vocus are the data centre providers who provide backup restoration and recovery services to Boardroom.

This report is prepared on a carve out basis and therefore does not include controls at the sub-service organisations of BoardRoom. The effectiveness of controls performed by users and their service providers should also be considered as part of the overall system of controls.

Summary of results

Below is a summary of the service auditor’s results and conclusions, by control objective. This summary of results do not provide all details relevant for users and their auditors and should be read in conjunction with the entire report. The details of the specific controls tested, and the nature, timing and extent of those tests, are listed in Section VI.

Control Objective	Number of controls effectively designed and operated	Number of controls per control objective	Results	Conclusion (in all material respects)
Registry controls				
F1: New accounts are set up completely and accurately in accordance with client agreements	4	4	No deviations noted.	Control objective met
F2: Complete and authorised client agreements are established prior to initiating accounting activity	2	2	No deviations noted.	Control objective met
F3: New security holder activity is clearly established and recorded completely, accurately and in a timely manner	6	7	Deviation noted in F3.2.	Control objective met
F4: Security holder documents received are checked, sorted and distributed for processing in a timely manner	0	1	Deviation noted in F4.1.	Control objective met
F5: Investor transactions and adjustments are authorised, processed accurately, completely and in a timely manner	5	5	No deviations noted.	Control objective met
F6: Cash receipts are processed accurately and banked promptly	2	2	No deviations noted.	Control objective met
F7: Cheques and confirmation letters issued are accurately generated, matched and authorised prior to dispatch	4	4	No deviations noted.	Control objective met
F8: Where issued capital is fixed, the number of securities in the registry records match the number of securities on issue	-	-	-	Not applicable
F9: Distribution payments and reinvestments are complete, calculated in accordance with the authorised distribution and processed timely	2	3	Deviation noted in F9.3.	Control objective met
F10: Accounts are administered in accordance with client agreements	5	5	No deviations noted.	Control objective met
F11: Changes to non-monetary client data (for example, address changes and changes in allocation instructions) are authorised and correctly recorded on a timely basis.	1	1	No deviations noted.	Control objective met
F12: Registrar records accurately reflect securities and cash held by third parties	-	-	-	Not applicable
F13: Security activity is recorded completely, accurately and positions are regularly reconciled	2	2	No deviations noted.	Control objective met
F14: Lost, stolen and balance transfer certificates are recorded in a timely manner	2	3	Deviation noted in F14.1.	Control objective met.
F15: Transaction errors are identified, notified to clients in accordance with client agreements and rectified if necessary	2	3	Deviation noted F15.2.	Control objective met.
F16: Appointments of subservice organisations, including those providing registry services, are approved, subservice organisation are properly managed, and their activities adequately monitored on a timely basis	1	2	Deviation noted F16.2.	Control objective met
F17: Client reporting is complete and accurate and processed within timescales	2	3	Deviation noted for control F17.1.	Control objective met.
F18: Withholding tax for non-residents, or where no TFN/ABN has been provided,	4	4	No deviations noted.	Control objective met

is calculated completely, accurately on a timely basis

Information technology				
G1: Physical access to computer networks, equipment, storage media and program documentation is restricted to authorised individuals	3	3	No deviations noted.	Control objective met
G2: Logical access to computer systems, programs, master data, transaction data and parameters, including access by administrators to applications, databases, systems and networks, is restricted to authorised individuals via information security tools and techniques	6	6	No deviations noted.	Control objective met
G3: Segregation of incompatible duties is defined, implemented and enforced by logical security controls in accordance with job roles	3	4	Deviation noted for control G3.3.	Control objective met
G4: IT processing is authorised and scheduled appropriately and exceptions are identified and resolved in a timely manner	2	2	No deviations noted.	Control objective met
G5: Appropriate measures, including firewalls and anti-virus software, are implemented to counter the threat from malicious electronic attack	2	2	No deviations noted.	Control objective met
G6: The physical IT equipment is maintained in a controlled environment	2	2	No deviations noted.	Control objective met
G7: Development and implementation of new systems, applications and software, and changes to existing systems, applications and software, are authorised, tested, approved, implemented and documented	4	4	No deviations noted.	Control objective met
G8: Data migration or modification is authorised, tested and once completed, is reconciled back to the source data	1	1	No deviations noted.	Control objective met
G9: Data and systems are backed up regularly, retained offsite and regularly tested for recoverability	4	4	No deviations noted.	Control objective met
G10: IT hardware and software issues are monitored and resolved in a timely manner	2	2	No deviations noted.	Control objective met
G11: Business and information systems recovery plans are documented, approved, tested and maintained	2	2	No deviations noted.	Control objective met
G12: Information technology services provided to clients are approved, managed and performance thresholds met in accordance with the requirements of the client agreement	-	-	-	Not applicable
G13: Outsourced activities are approved and managed in accordance with the requirements of the client agreement	1	1	No deviations noted.	Control objective met

The Independent Service Auditor's Assurance Report provided by Deloitte on the description of controls, their design and operating effectiveness over securities registry services, was an unmodified opinion. That opinion is included in Section IV, Independent Assurance Report, within this Controls Report.

Section II: Statement by the Service Organisation

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The accompanying description has been prepared for customers who have used the securities registry services system and their auditors who have a sufficient understanding to consider the description, along with other information including information about controls operated by customers themselves, when assessing the risks of material misstatements of customers' financial reports/statements. BoardRoom confirms that:

- (a) The accompanying description in Section III fairly presents the securities registry services system for processing customers' transactions throughout the period 1 July 2021 to 30 June 2022. The criteria used in making this statement were that the accompanying description:
 - i. Presents how the system was designed and implemented, including:
 - The types of services provided, including, as appropriate, classes of transactions processed.
 - The procedures, within both information technology and manual systems, by which those transactions were initiated, recorded, processed, corrected as necessary, and transferred to the reports prepared for customers.
 - The related accounting records, supporting information and specific accounts that were used to initiate, record, process and report transactions; this includes the correction of incorrect information and how information was transferred to the reports prepared for customers.
 - How the system dealt with significant events and conditions, other than transactions, including the impact of COVID-19 on the service organisation as detailed in the "Impact of COVID-19 section" in the description.
 - The process used to prepare reports for customers.
 - Relevant control objectives and controls designed to achieve those objectives.
 - Controls that we assumed, in the design of the system, would be implemented by customers, and which, if necessary to achieve control objectives stated in the accompanying description, are identified in the description along with the specific control objectives that cannot be achieved by ourselves alone.
 - Other aspects of our control environment, risk assessment process, information system (including the related business processes) and communication, control activities and monitoring controls that were relevant to processing and reporting customers' transactions.
 - ii. Includes relevant details of changes to the service organisation's system during the period 1 July 2021 to 30 June 2022.

- iii. Does not omit or distort information relevant to the scope of the system being described, while acknowledging that the description is prepared to meet the common needs of a broad range of customers and their auditors and may not, therefore, include every aspect of the system that each individual customer may consider important in its own particular environment.
- (b) The controls related to the control objectives stated in the accompanying description were suitably designed and operated effectively throughout the period 1 July 2021 to 30 June 2022. The criteria used in making this statement were that:
- i. The risks that threatened achievement of the control objectives stated in the description were identified;
 - ii. The identified controls would, if operated as described, provide reasonable assurance that those risks did not prevent the stated control objectives from being achieved; and
 - iii. The controls were consistently applied as designed, including that manual controls were applied by individuals who have the appropriate competence and authority, throughout the period 1 July 2021 to 30 June 2022.

BoardRoom Pty Limited



Martin Jones

General Manager, Corporate Governance

1 August 2022

Section III:

Description of the System accompanying the Statement by the Service Organisation

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Overview of BoardRoom Pty Limited

Boardroom Pty Limited ("**BoardRoom**") is a leading Australian provider of professional services to both listed and unlisted entities. Founded in 1983, BoardRoom is a wholly owned subsidiary of Boardroom Pte Ltd, one of the largest professional services providers in the Asia/Pacific region with offices in Singapore, China, Hong Kong and Malaysia, as well as Australia. The BoardRoom Group services over 5500 publicly listed and unlisted companies and employs over 600 staff. Boardroom Pte Ltd (then called Boardroom Limited) was listed on the Singapore Stock Exchange ("SGX") until 2018.

On 14th February 2022, a transfer of shares in Boardroom Limited (since renamed Boardroom Pte Ltd) from G. K. Goh Holdings Limited to Apricus Global Pte Ltd, was completed. Apricus Global Pte Ltd is owned 60% by Tower Capital Corporate Services GP Pte Ltd, a private equity firm and 40% by 65EP Investment III Pte Ltd, a company ultimately owned by Temasek Holdings (Private) Limited

Services owned by BoardRoom Pty Limited

Type of service	What BoardRoom does
SECURITIES REGISTRY SERVICES	<ul style="list-style-type: none"> • Securities Registry Management Services to Entities (predominately companies and managed investment schemes) both Listed and Unlisted • Processing of applications for securities and handling of application moneys • Processing of redemption requests and payment of redemption proceeds to investors • Calculation and payment of dividends/distributions • Planning and management of meetings (AGMs and GMs) • Management of corporate actions and special projects • Investor Solicitation Services • Security Holder Analytics
EMPLOYEE EQUITY PLAN (EEP) SERVICES	<ul style="list-style-type: none"> • EEP Documentation and Plan Maintenance Services • EEP Tax Reporting • VWAP Calculations • Sale and Purchase Facilities • Foreign Currency Payment facilities • Access to professional Trustee Services
CORPORATE SECRETARIAL SERVICES	<ul style="list-style-type: none"> • Board, committee and shareholder meeting management • Drafting and lodging ASX/NSX announcements • Managing changes to the company details • Maintenance of registers and minute books • Subsidiary company management • Support services during peak periods or special projects • Preparation of Corporate Action Documentation
PAYROLL SERVICES	<ul style="list-style-type: none"> • General Payroll management services • Provision of payroll software (under licence)

For the purposes of this report, testing has been performed across the Securities Registry Services only.

Structure and responsibility

BoardRoom's organisation structure provides the framework within which its activities for achieving entity-wide objectives are planned, executed, controlled and monitored. The following are the roles and responsibilities of key team members within BoardRoom's organisation structure:

Position	Responsibilities
Chief Executive Officer (CEO)	Provides overall direction and guidance of BoardRoom's operations
Chief Financial Officer and General Manager People and Client Payroll(CFO)	Is responsible for: <ul style="list-style-type: none"> a) managing the financial actions of the company. Duties include tracking cash flow and financial planning as well as analysing the company's financial strengths and weaknesses and proposing corrective actions; b) working with the Manager Human Resources to manage BoardRoom's Human Resources activities; and c) overseeing the team delivering payroll operational services.
Chief Commercial Officer (CCO)	Is responsible for BoardRoom's marketing and sales functions and, in conjunction with the Senior Manager Corporate Actions, delivery of corporate action services to BoardRoom's clients.
Chief Information Officer (CIO)	Is responsible for the overall performance of the organisation's IT functions, including software development.
General Manager Corporate Governance	Is responsible for the team which monitors compliance to audit and governance requirements, as well as for the overall risk management of the company
Head of Compliance	Monitors compliance to existing regulatory requirements and proposes process changes to meet new obligations or requirements identified as a result of regulatory change
Head of Listed Services	Leads the team providing client engagement services to clients listed on one of the Australian stock exchanges
General Manager Operations and Head of Employee Plans and Unlisted Fund Services	<ul style="list-style-type: none"> a) Is responsible for the organisation's operational performance; and b) Leads the teams providing client engagement services for client who are the responsible entity of managed investment schemes (both registered and unregistered), trustees of trusts and issuers with employee equity plans

Furthermore, the BoardRoom group in Australia, headed by Boardroom Holdings Australia Pty Ltd, has a separate Board of Directors, which meets on a bi-monthly basis to discuss the operations of the business as well as any matters regarding compliance, risks (including information technology risks), controls, etc. It consists of two (2) non-executive and four (4) executive directors and is chaired by an Australian based non-executive director.

Insurance

As part of its risk management process, BoardRoom maintains insurance coverage. In recognition of the changing risks faced in providing its services, the level of coverage and the types of policies maintained are reviewed annually in conjunction with BoardRoom's insurance brokers.

Control Environment

The control environment is an essential component of an organisation's governance structure and includes the control consciousness of its people. It is the foundation for all other components of internal control, providing discipline and structure. The objectives of an internal control structure are to provide reasonable, but not absolute, assurance as to the integrity and reliability of the financial information, the protection of

assets from unauthorised use or disposition, and that transactions are executed in accordance with management's authorisation and client instructions.

The management of BoardRoom have established and maintained an internal control structure that monitors compliance with established policies and procedures.

BoardRoom's executive management are accountable to the Board of Directors of BoardRoom for monitoring the system of internal control within the business. BoardRoom's executive management have implemented an internal control system designed to facilitate effective and efficient operations. The control environment has been designed to enable management to respond appropriately to significant business, operational, financial, compliance and other risks. The system of internal control contributes to ensuring adequate control of internal and external reporting and compliance with applicable laws and regulations.

BoardRoom regards its internal control environment as fundamental to its business strategy. All business development initiatives are required to adhere to stringent control standards.

Control environment elements, and the extent to which each is addressed at BoardRoom are listed and described below:

Registry Controls (F Controls)

1. Registry Management System
2. Changes to securities holder records
3. Dividend or distribution processing and bank account reconciliation
4. Dispatch of transaction and confirmations to security holders
5. SREG transaction controls

IT Controls (G Controls)

1. Network Architecture
2. System Security
3. Disaster Recovery
4. Change Management
5. Incident and Error Monitoring
6. Backups and Batch Job Monitoring
7. Implementation Management
8. Mailroom

Registry Management System

The stated internal control objectives and related controls included in this report apply to BoardRoom's operations as they relate only to securities registry services. Specifically excluded from this report are controls executed at customer premises and other services provided by BoardRoom.

The effectiveness of controls performed by customers of BoardRoom should also be considered as part of the overall system of control relating to processing performed by BoardRoom.

BoardRoom has developed and undertakes the ongoing maintenance of its own proprietary software for the management of securities issuers and registers. The Securities Registry system (SREG) is the integrated system that caters for all types of activities that may be required in the management of a securities register. These include:

- Recording of securities holder details such as name, address, Tax File Number, US Foreign Account Tax Compliance Act (FATCA) or Common Reporting Standard (CRS) status, bank account information for the purposes of direct credit payments, elections in relation to dividend or distribution reinvestment options that may be available and elections in respect of communication choices, under an individually referenced holder record;
- Recording of similar details for participants in an issuer's employee equity plan (EEP), as well as specific details such as plan participation and securities that have vested;
- Receipt and processing of Clearing House Electronic Sub-Register System (CHES) messages received and despatch of the appropriate response message;
- Support for the segregation of duties through the ability to limit a BoardRoom employee's SREG access to specific privileges, functions and issuers on a completely customisable basis;
- Inquiry functionality to enable authorised BoardRoom employees to review information stored in relation to securities holders;
- Facilitation and recording of transactions such as allotment, transfer and redemption, in respect of each holding of securities;

- Message response and transaction settlement where an unlisted managed investment scheme issuer participates in the mFund and Calastone service provided by Australian Securities Exchange;
- Calculation of dividend or distribution payments, calculation of any taxation amounts to be withheld (both resident and non-resident) and fulfilment of payment method elections recorded for securities holders;
- Calculation of entitlements in the event of the securities issuer offering existing securities holders the right to acquire additional securities;
- Recording of and reporting in respect of proxy voting instructions received where the securities issuer is holding a meeting of securities holders; and
- Preparation and lodgement of statutory reporting with government organisations such as the Australian Taxation Office.

Changes to securities holder records

BoardRoom receives notifications that trigger them to change a security holder's record in SREG. This is received either through a message from ASX Settlement Operations Pty Ltd, the operator of CHESS or directly from the security holder (or their duly appointed representative).

Messages received from the CHESS operator are subject to various forms of authentication and warranties contained in the ASX Settlement Operating Rules. As a result, and in accordance with the requirement that a securities issuer cannot interfere or delay the processing of these messages, these messages are automatically processed by SREG.

Notifications received directly from the security holders, such as transfers, applications for securities or requests for securities redemption are subject to a number of verification procedures before the information is updated in SREG. These controls include:

- Validation of the notification to determine whether it contains the necessary information (name, address, the security holding reference, the security against which the notification is to be applied, etc.) to correctly identify the securities holding to be amended; and
- Validation to ensure the notification has been completed correctly. There are specific requirements for notification of changes such as securities transfers, and there are general requirements in relation to all notifications concerning the signing of documents. For requests for the redemption of securities of an unlisted managed investment scheme, the signature(s) on the redemption request is checked against the signature(s) on the original application form.

Having passed these validation checks, the corresponding amendment is made in the system by the Data Entry Team. Upon completion of the data entry, an 'Audit Trail' Report is generated from SREG and that report, together with the original notification documentation, is passed to BoardRoom's Quality Assurance Team who reviews the notification for accuracy and ensures the information has been correctly entered against the security holder records.

Dividend or distribution processing and bank account reconciliation

Calculations are based on information supplied by the securities issuer. Prior to commencement of the actual calculation, BoardRoom's Quality Assurance team reviews the payment calculation parameters that have been entered into SREG. These parameters are verified against the information supplied by the securities issuer. The calculation does not commence until review has been completed.

As part of the calculation, SREG produces a summary report. This is sent to the securities issuer for review and verification. Payments are only made when the securities issuer has returned the reviewed and verified calculation summary report and provided the bank account from which payments are to be made to BoardRoom.

Reconciliation of the bank accounts from which payments are drawn is undertaken by staff that are not involved in the calculation and processing of the dividend. Similarly, if there is a request from a security holder for a payment to be replaced, the replacement is undertaken by staff who are not involved in the calculation or reconciliation processes. In this way there is well-defined separation of duties.

Dispatch of transaction and confirmations to security holders

Other than transactions recorded on the CHESS sub-register, recording of a transaction in SREG produces a holding statement and certificates (if necessary) to be dispatched to the security holder. These confirmations can be printed, enveloped and dispatched in-house or by an external print and mail supplier. On a daily basis, there is a reconciliation performed on the holding statements and certificates mailed out within the day.

SREG transaction controls

Being purpose built, SREG has a number of built-in controls. These include:

- *Daily 'audit' reports:-* After each day's processing a number of reports are produced. These cover such things as transactions that are still in progress, whether the manual issued capital balance recorded in SREG (maintained by BoardRoom's Quality Assurance team) matches the calculated issued capital for each securities issuer and whether there are dividend or distribution payments that are still incomplete;
- *Triple Cross Check:-* SREG calculates the total issued capital for each client by adding all transactions in the system for that issuer and then separately adding all security holding balances before comparing these to the total issued capital recorded. Any imbalance is then reported and fixed;
- *Transactions release:-* Changes to transactions in SREG are 'locked' until a review is conducted by BoardRoom's Quality Assurance team. Once reviewed, the Quality Assurance team marks the transaction as 'unlocked' before passing the relevant documentation to another team who will release the transaction for update. No amendment to the holder record in SREG is made until the transaction has been both unlocked and released for update; and
- *Daily Back up:-* Before any transaction update commences, the SREG database is backed up, thus allowing 'roll-back' if necessary.

The System

The stated internal control objectives and related controls included in this report apply to BoardRoom's operations as they relate only to registry services. Specifically excluded from this report are controls within individual systems, controls executed at customer premises and other services provided by BoardRoom. The effectiveness of controls performed by customers of BoardRoom should also be considered as part of the overall system of control relating to processing performed by BoardRoom.

Overview of the Information Systems Environment

Structure and responsibility

The SREG Information Technology environment is managed by the IT Team under the direction of the Manager, Technical Operations.

IT is responsible for the following functions:

- Physical Access
- Logical Access
- Segregation of Duties
- IT Processing
- Physical IT Equipment
- Change Management
- Data Migration
- Data and System Backup
- Business and Recovery Plans
- Outsourced Activities
- Firewall and antivirus
- IT Services
- IT Hardware and Software

The following functions are outsourced to third parties to varying degrees:

- Data Centre Management
- Database Management

Network Architecture

BoardRoom's head office is located in George Street, Sydney. The Registry Management system (SREG) is developed and managed by BoardRoom. The production hardware used to host SREG is located in a data centre located in Ultimo, Sydney, operated by third-party infrastructure service provider Optus. Data stored within this data centre is replicated for disaster recovery purposes to the Vocus data centre hosted in Baulkham Hills, Sydney.

Two firewall layers protect BoardRoom's network at each of the three (3) locations. The primary layer is virtual machine-based firewalls. The secondary layer is hardware-based firewalls. Each firewall layer is under the control of BoardRoom's Technical Operations team, who specifically developed the firewall access rules implemented. In addition, anti-virus software which is updated regularly has been installed at all locations.

On an annual basis, BoardRoom engages a qualified independent organisation to undertake penetration testing of outward facing functions to test the implemented security measures. Coverage includes the web portals provided by BoardRoom for use by investors, employee equity plan participants and clients. The annual testing is in addition to any ad-hoc penetration testing that may be undertaken during the year.

System Security

Before a user gains access to either the BoardRoom network or to SREG, a help desk request is lodged. Access to the network is provisioned separately to access rights in SREG. Only BoardRoom's Technical Operations team can establish network access and there are a limited number of BoardRoom's senior executive management who can provide SREG access. SREG operates on the basis of access rights being granted on an individual employee basis. That is, for each employee, it is possible to set specific privileged access, functional access and issuer access.

BoardRoom has a policy which includes ensuring the revocation of the network and SREG access upon an employee's termination.

When an employee joins BoardRoom and requires SREG access, it is provided on a "least access" basis. That is access is limited dependant on the employee's role and position. If an employee moves between departments and undertakes a different job role, their access rights are reviewed. If applicable, their existing SREG user profile is deleted and a new user is created based on an employee already working in that department and undertaking a similar role.

Annual user access reviews of privilege levels are performed across SREG access.

Disaster recovery

In the event of a power failure the data centres have their own Uninterruptable Power Supply ("UPS") as well as backup generators. There is also hardware at the data centre for storage of information on shared drives, which can include reports produced for securities issuers. Shared drive information is replicated in a data storage housed at BoardRoom's George Street offices, as well as data storage housed at the Disaster Recovery site. Thus, providing for triple redundancy.

Access to the data centre is limited to authorised BoardRoom staff members. Currently, this is limited to BoardRoom's Technical Operations team, the Chief Information Officer and the General Manager Corporate Governance.

BoardRoom has an agreement with a third-party service provider to utilise a commercial disaster recovery/business continuity site for the purposes of housing its disaster recovery equipment and providing space in the event that BoardRoom's main office is uninhabitable.

The disaster recovery site is situated in a different geographical location and using a separate power and networking grid to the data centre at which the production equipment is housed. This disaster recovery site has its own UPS as well as generator back up in the event of a power failure. As with the access to the data centre, access to the disaster recovery site is limited to specific BoardRoom staff. Currently, only BoardRoom's Technical Operations Manager, the Chief Information Officer and General Manager Corporate Governance can authorise access by BoardRoom staff, to either of the data centres.

To ensure the currency of information held at the business continuity or disaster recovery site, logs of SREG database changes are transmitted from the production site to the disaster recovery site every five minutes, ensuring minimal loss of data in the event of a disaster. Furthermore, shared drive information is continually replicated across storage devices located in each of the three sites: production data centre, disaster recovery site and George Street.

Change management

All requests for application functionality changes to SREG have to be logged through BoardRoom's help desk software, Mantis. These are then subject to scrutiny and prioritisation by BoardRoom's management before development can commence. Changes must be tested and approved prior to implementation.

BoardRoom's IT Governance Committee meets on a weekly basis to monitor progress with any changes and, if necessary, amend priority.

Incident and error monitoring

Incident alerts relating to SREG, including software or hardware faults, are logged through BoardRoom's help desk software, Mantis. Incidents are investigated by the IT Help Desk team to resolve the error, with greater priority being given to higher severity incidents.

Backups and batch job monitoring

Backups for SREG are managed through three separate jobs – a backup job each for the Oracle database, virtual machine and data centre replication (known as Log Shipping). For the Oracle Database, a full backup is performed weekly, with incremental backups performed daily. The Technical Operations team receives daily backup reports to notify of any errors. The virtual machine performs daily, weekly and monthly snapshots which are replicated to the DR site. For Log Shipping, data is replicated from the Ultimo production server to the DR site every 3 minutes. Monitoring over this performed via 6 hourly email alerts that are sent to the Technical Operations team for review. Across all three backup jobs, errors are investigated by the Technical Operations team and any unsuccessful jobs are rerun where required.

Implementation management

BoardRoom recognises that any system change can bring risk. It has instituted a requirement that no change can be implemented in production until it has been tested by the business users and, assessed as "fit for purpose" by the relevant businesses. Test results are stored against the change request logged through the help desk software to provide auditability.

Mailroom

BoardRoom's internal mailroom staff manage the issuing of documents to clients, including invoices and holding statements. Automated batch jobs are used to print all the documents on a daily basis, which are then collated and folded by mailroom staff. Each document is mapped to a Delivery Point Identifier barcode 17 as issued by Australia Post. Mailroom staff sign off on all envelopes before they are mailed via Australia Post.

Controls at Subservice Organisations

BoardRoom uses Budget Mailing Service (BMS) and Data Transfer Services (DTS) to provide printing and mailing services, which form part of the SREG system used by BoardRoom's customers. The printing and mailing services provided by BMS and DTS are only used under the following circumstances:

- To accommodate scenarios where mailroom volume of mail is over 10,000;
- If there are dividend payments to be made and capacity at BoardRoom is fully exhausted; and
- For clients whose mailing management is considered more complex.

Boardroom uses Optus and Vocus as its data centre provider, who provide backup restoration and recovery services as part of the SREG system used by BoardRoom's customers.

BoardRoom's description of the system includes BoardRoom's monitoring controls over the operating effectiveness of the controls at BMS, DTS, Optus and Vocus and excludes relevant control objectives and related controls of BMS, DTS, Optus and Vocus.

Impact of COVID-19

In March 2020, the spread of COVID-19 was declared a pandemic by the World Health Organisation. To address how this emerging macro-economic risk would impact the business and operations of BoardRoom, a COVID-19 Crisis Governance Committee, was established. This Committee comprises all BoardRoom management and continues to meet as required to monitor and, if necessary, adjust the actions which have been implemented. The consideration of the impact of COVID-19 has been reflected in the description of the Registry Management system and controls and have been categorised broadly in the following areas:

Control Environment

In considering the COVID-19 impact on BoardRoom management considered whether the wider impacts of COVID-19, including travel restrictions and social distancing requirements, caused any changes in behaviour

or highlighted any challenges to, or lack of resilience, in BoardRoom's current business model on the following areas:

- BoardRoom's structure and scale of its operations
- The markets or geographical or demographic spheres, and parts of the value chain, in which it operates, how it engages with those markets or spheres (main products, customer segments and distribution methods), and the basis on which it competes
- The resources (e.g., financial, human, intellectual, environmental and technological) and other inputs and relationships (e.g., customers, competitors, suppliers and employees) that are necessary or important to its operations
- How BoardRoom's business model integrates the use of IT in its interactions with customers, suppliers, lenders and other stakeholders through IT interfaces and other technologies

Risk Assessment

BoardRoom's risk assessment approach and conclusions have been revisited to verify that they are appropriately responsive to the changes in the organisation that have occurred since the outbreak of COVID-19. Our consideration focused on the following areas:

- Revenue, technology and other infrastructure disruption.
- Processes that are reliant on select few resources (e.g., highly technical areas, estimates, and significant judgments) and may require updates to delegation of authority.
- Processes that are highly manual.
- Areas that are susceptible to fraud (e.g., money movement)
- Challenges to obtain relevant data that is used to prepare certain financial information and reports
- Delays in processing of transactions or processing being performed by different people due to illness, changed working hours or loss of productivity
- Office or location where BoardRoom provides the services being closed or limiting access
- BoardRoom's assessment of the fraud risk
- Whether there have been any changes to the control environment including a weakened control environment, where there may be more opportunity for BoardRoom staff to override the controls in place.
- Risk of IT control deficiencies or cyber-attack in times when IT systems normal operations may be changed or disrupted
- Subservice organisations essential to the control environment may face their own challenges, which could impact on their ability to reliably execute their processes and controls upon which reliance is placed.
- The impact on the design, implementation and operating effectiveness of controls throughout the period which may include pre-COVID-19 activity, lock-down restricted activity and phased resumption of activity.

Design of Controls

The design of controls which needed adjustment (as well as appropriate documentation of the adjustment maintained) to compensate for changes in risk, or contingency plans put in place. Our consideration focused on the following areas:

- Revision to internal policies and control design – particularly for manual /on-site controls. This includes a review of the BoardRoom COVID-19 policy implemented during the start of March 2020.
- How BoardRoom would have enacted its business continuity plan were it to become necessary and what changes have been made as a result of that
- Remote working arrangements changing how a control traditionally operated or how consistently the control operated
- Whether the design of manual controls requires more evidence and documentation under normal circumstances, and these factors could be adversely affected at the current time, and subject to increased risk of deviations
- Changes to controls that are designed to operate through in-person meetings
- Changes to the criteria for investigation or the process for follow-up for controls with a review element
- How BoardRoom adapted controls that require physical observation to execute
- How existing monitoring activities cover any newly implemented controls. Implementation of Controls
- How BoardRoom would have enacted its business continuity plan in any form and what changes have been made as a result of that
- How remote working arrangements are changing the implementation of controls
- Identification of which controls are most susceptible to failure, due to COVID-19, or based on historical trends and the appropriate compensating or mitigating controls exist and are operating effectively
- Challenges around newly implemented controls being performed consistently
- The point in time within the reporting period that a control changed and the resulting impact especially if no suitable control has been implemented to replace the control.

Section IV: Independent Service Auditor's Assurance Report on the Description of Controls, their Design and Operating Effectiveness

Independent Service Auditor's Assurance Report on the Description of Controls, their Design and Operating Effectiveness

To the Directors of BoardRoom,

Opinion

We have been engaged to report on BoardRoom's description in Section III and the control objective and controls in Section VI of its securities registry service system for processing customers' transactions throughout the period from 1 July 2021 to 30 June 2022 (the description), the accompanying statement in Section II and on the design and operation of controls related to the control objectives stated in the description.

In our opinion, in all material respects, based on the criteria included in the Statement in Section II:

- (a) The description in Section III fairly presents the securities registry services system as designed and implemented throughout the period from 1 July 2021 to 30 June 2022;
- (b) The controls related to the control objectives stated in the description were suitably designed throughout the period from 1 July 2021 to 30 June 2022; and
- (c) The controls tested, which were those necessary to provide reasonable assurance that the control objectives stated in the description were achieved, operated effectively throughout the period from 1 July 2021 to 30 June 2022.

Basis of Opinion

We conducted our engagement in accordance with Standard on Assurance Engagements ASAE 3402 *Assurance Reports on Controls at a Service Organisation*, and with reference to Guidance Statement GS 007 *Audit Implications of the Use of Service Organisations for Investment Management Services*, issued by the Auditing and Assurance Standards Board. That standard requires that we plan and perform our procedures to obtain reasonable assurance about whether, in all material respects, the description is fairly presented, and the controls are suitably designed and operating effectively.

We have not evaluated the suitability of design or operating effectiveness of complementary user entity controls. The control objectives stated in the service organisation's description of its system can be achieved only if complementary user entity controls are suitably designed or operating effectively, along with the controls at the service organisation.

BoardRoom uses the subservice organisations Budget Mailing Service (BMS) and Data Transfer Services (DTS) to provide printing and mailing services, which form part of the SREG system used by BoardRoom's customers. Optus and Vocus are the data centre providers who provide backup restoration and recovery services to Boardroom.

BoardRoom's description of the system includes BoardRoom's monitoring controls over the operating effectiveness of the controls at BMS, DTS, Optus and Vocus and excludes relevant control objectives and related controls of BMS, DTS, Optus and Vocus.

Our opinion has been formed on the basis of the matters outlined in this report.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

BoardRoom's Responsibilities

BoardRoom is responsible for: preparing the description and accompanying statement in Section II, including the completeness, accuracy and method of presentation of the description and statement; providing the services covered by the description; stating the control objectives; and designing, implementing and effectively operating controls to achieve the stated control objectives.

Our Independence and Quality Control

We have complied with independence and other relevant ethical requirements relating to assurance engagements and apply Auditing Standard ASQC 1 Quality Control for Firms that Perform Audits and Reviews of Financial Reports and Other Financial Information, Other Assurance Engagements *and Related Services* in undertaking this assurance engagement.

Service Auditor's Responsibilities

Our responsibility is to express an opinion on BoardRoom's description and on the design and operation of controls related to the control objectives stated in that description, based on our procedures.

An assurance engagement to report on the description, design and operating effectiveness of controls at a service organisation involves performing procedures to obtain evidence about the disclosures in the service organisation's description of its system, and the design and operating effectiveness of controls. The procedures selected depend on our judgement, including the assessment of the risks that the description is not fairly presented, and that controls are not suitably designed or operating effectively. Our procedures included testing the operating effectiveness of those controls that we consider necessary to provide reasonable assurance that the control objectives stated in the description were achieved. An assurance engagement of this type also includes evaluating the overall presentation of the description, the suitability of the objectives stated therein, and the suitability of the criteria specified by the service organisation and described in Section II.

In evaluating the suitability of the objectives stated in the description, we have determined whether each of the minimum control objectives provided in GS 007 for securities registry services is included, or, if any of them are omitted or amended, that the reason for the omission or amendment is adequately disclosed in the description.

Limitations of Controls at a Service Organisation

BoardRoom's description is prepared to meet the common needs of a broad range of customers and their auditors and may not, therefore, include every aspect of the system that each individual customer may consider important in its own particular environment. Also, because of their nature, controls at a service organisation may not prevent or detect all errors or omissions in processing or reporting transactions. Also, the projection of any evaluation of effectiveness to future periods is subject to the risk that controls at a service organisation may become inadequate or fail.

Description of Tests of Controls

The specific controls tested, and the nature, timing and results of those tests are listed in Section VI.

Other Information

BoardRoom is responsible for the other information. The other information comprises Section I and Section VII for the financial year ended 2021, but does not include the statement in Section II, description in Section III, and the control objectives and controls stated in the description and our service auditor's report thereon.

Our opinion on the description in Section III and on the design and operation of controls related to the control objectives stated in the description does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our assurance engagement, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the description in Section III or our knowledge obtained during the assurance engagement, or otherwise appears to be materially inconsistent or contains a material misstatement of fact. If, based on the work we have performed, we conclude that there is a material inconsistency or a material misstatement of fact of this other information, we are required to report that fact. We have nothing to report in this regard.

Intended Users and Purpose

This report and the description of tests of controls in Section VI are intended only for customers who have used BoardRoom's securities registry service system, and their auditors, who have a sufficient understanding to consider it, along with other information including information about controls operated by customers themselves, when assessing the risks of material misstatements of customers' financial reports/statements.

Restriction of distribution and use

We disclaim any assumption of responsibility for any reliance on this report to any person other than BoardRoom's clients and their auditors or for any purpose other than that for which it was prepared. This report is not intended to and should not be used or relied upon by anyone else and we accept no duty of care to any other person or entity.

Deloitte Risk Advisory Pty Ltd



Ally MacLeod

Partner
Chartered Accountant

Sydney, 1 August 2022

Section V: Overview of the Work Performed

Section V: Overview of the Work Performed

Introduction

This report on the description of the system is intended to provide customers and their auditors with information for their evaluation of the effect of a service organisation on a customer's internal control relating to BoardRoom's controls over securities registry service system throughout the period 1 July 2021 to 30 June 2022.

Deloitte Risk Advisory Pty Ltd's engagement was conducted in accordance with the Standard on Assurance Engagements 3402, *Assurance Reports on Controls at a Service Organisation*, issued by the Auditing and Assurance Standards Board. Testing of BoardRoom's controls was restricted to the control objectives and related control activities listed in Section VI and was not extended to controls that may be in effect at user organisations.

Deloitte Risk Advisory's work was primarily carried out remotely due to the COVID-19 pandemic and where required, onsite visits to the premises of BoardRoom at their George Street office in Sydney. The scope of work was based on criteria (control objectives) agreed with management of BoardRoom prior to the commencement of work.

Deloitte Risk Advisory Pty Ltd's report does not include controls at sub-service organisations (DTS, BMS, Optus and Vocus).

Control environment elements

The control environment sets the tone of an organisation, influencing the control consciousness of its people. It is the foundation for other components of internal control, providing discipline and structure. In addition to the tests of design, implementation, and operating effectiveness of controls identified by BoardRoom, Deloitte Risk Advisory Pty Ltd's procedures included tests of the relevant elements of BoardRoom's control environment in Section III.

There are a number of services that BoardRoom provides which are excluded from the scope of this report as they are not in scope of this engagement. These are:

- Employee Equity Plan (EEP) Services;
- Corporate Secretarial Services;
- Voting Services; and
- Accounting and Payroll Services.

Such tests included inquiry of the appropriate management, supervisory, and staff personnel; observation of BoardRoom's activities and operations, inspection of BoardRoom's documents and records, and re-performance of the application of BoardRoom's controls. The results of these tests were considered in planning the nature, timing, and extent of testing of the control activities described in Section VI.

Obtaining Evidence Regarding the Description

Deloitte Risk Advisory Pty Ltd obtained and read the service organisation's description of its system in Section III, and evaluated whether those aspects of the description included in the scope of the engagement are fairly presented, including whether:

- a) Control objectives stated in the service organisation's description of its system are reasonable in the circumstances;
- b) Controls identified in that description were implemented;
- c) Complementary user entity controls, if any, are adequately described; and
- d) Services performed by a subservice organisation, if any, are adequately described, including whether the inclusive method or the carve-out method has been used in relation to them.

Obtaining Evidence Regarding Design of Controls

In determining which of the controls at the service organisation are necessary to achieve the control objectives stated in the service organisation's description of its system, Deloitte Risk Advisory Pty Ltd assessed whether those controls were suitably designed. This included:

- a) Identifying the risks that threaten the achievement of the control objectives stated in the service organisation's description of its system; and
- b) Evaluating the linkage of controls identified in the service organisation's description of its system with those risks. Some of the considerations Deloitte Risk Advisory Pty Ltd took into account included:
 - a. Appropriateness of the purpose of the control and its correlation to the risk/assertion
 - b. Competence and authority of the person(s) performing the control
 - c. Frequency and consistency with which the control is performed
 - d. Level of aggregation and predictability
 - e. Criteria for investigation (i.e. threshold) and process for follow-up.

Tests of operating effectiveness

Deloitte Risk Advisory Pty Ltd's tests of the controls were designed to cover a representative number of transactions throughout the period from 1 July 2021 to 30 June 2022. In determining the nature, timing and extent of tests we considered the following:

- a) Nature and frequency of the controls being tested
- b) Types of available evidential matter
- c) Nature of the control objectives to be achieved
- d) Assessed level of control risk
- e) Expected effectiveness of the test, and
- f) Results of tests of the control environment.

Testing the accuracy and completeness of information provided by BoardRoom is also part of the testing procedures performed. Information we utilised as evidence may have included, but was not limited to:

- Standard "out of the box" reports as configured within the system
- Parameter-driven reports generated by BoardRoom's systems
- Custom-developed reports that are not standard to the application such as scripts, report writers, and queries
- Spreadsheets that include relevant information utilized for the performance or testing of a control
- BoardRoom prepared analyses, schedules, or other evidence manually prepared and utilized by BoardRoom.

While these procedures may not be specifically called out in the test procedures listed in Section VI, they may be completed as a component of testing to support the evaluation of whether or not the information is sufficiently precise and detailed for purposes of fully testing the controls identified by BoardRoom.

Description of testing procedures performed

Deloitte performed a variety of tests relating to the controls listed in Section VI throughout the period from 1 July 2021 to 30 June 2022. The tests were performed on controls as they existed during this period and were applied to those controls relating to control objectives specified by BoardRoom.

Tests performed for the purpose of this report may have included, but were not limited to those described below:

Test	Description
Enquiry	Conducted detailed interviews with relevant personnel to obtain evidence that the control was in operation during the report period and is accompanied by other procedures noted below that are necessary to corroborate the information derived from the enquiry.
Observation	Observed the performance of the control multiple times throughout the report period to evidence application of the specific control activity.
Inspection of documentation	If the performance of the control is documented, inspected documents and reports indicating performance of the control.
Reperformance of monitoring activities or manual controls	Obtained documents used in the monitoring activity or manual control activity and independently reperfomed the procedures. Compared any deviation items identified with those identified by the responsible control owner.
Reperformance of programmed processing	Input test data, manually calculated expected results, and compared actual results of processing to expectations.

Sampling Methodology

In terms of frequency of the performance of the control by BoardRoom, we consider the following guidance when planning the extent of tests of control for specific types of control.

- a) The purpose of the procedure and the characteristics of the population from which the sample will be drawn when designing the sample;
- b) Determine a sample size sufficient to reduce sampling risk to an appropriately low level;
- c) Select items for the sample in such a way that each sampling unit in the population has a chance of selection;
- d) If a designed procedure is not applicable to a selected item, perform the procedure on a replacement item; and
- e) If unable to apply the designed procedures, or suitable alternative procedures, to a selected item, treat that item as a deviation.

The following guidelines are at a minimum followed in performing the test of controls:

Frequency of control activity	Minimum sample size
Annual	1
Quarterly	2
Monthly	2
Weekly	5
Daily	15
Many times, per day	25
Automated Controls	Test one instance of each automated control.
Indirect Controls (e.g., indirect entity-level controls, general IT controls)	For those indirect entity-level controls that do not themselves directly address risks of material misstatement, the above is the suggested minimum sample size for the test of operating effectiveness. In the event that the indirect control is directly responsive to the control objective, the above is the minimum sample size for the test of operating effectiveness.

The table assumes zero deviations.

The nature and cause of deviations identified (if any), were evaluated to conclude on whether the deviations are material individually or in combination.

Reporting on results of testing

In most instances, controls are performed in the same manner and with the same degree of intensity for all clients. For this reason, samples were chosen from the whole population of BoardRoom transactions. Deloitte Risk Advisory Pty Ltd does not have the ability to determine whether a deviation will be relevant to a particular user, consequently all deviations are reported.

Results of testing

The concept of effectiveness of the operation of controls recognises that some deviations in the way controls are applied by BoardRoom may occur. Deviations from prescribed controls may be caused by such factors as changes in key personnel, significant seasonal fluctuations volume of transactions and human error.

We use judgement in considering the overall operating effectiveness of the control by considering the number of deviations detected, the potential significance of the financial statement effect, as well as other qualitative aspects of the deviations such as the cause of the deviation.

When we identify a deviation for a periodic or automated control, we consider whether other controls / mitigating controls may provide the evidence we require.

If we find a single deviation in the initial sample for a recurring manual control operating multiple times per day, when we did not expect to find control deviations, we consider whether the deviation is representative of systematic or intentional deviations.

If control deviations are found in tests of controls which operate daily or less frequently, the sample size cannot be extended and we assess such controls as ineffective.

Section VI: Control Objectives, Control Activities, Testing of Design and Implementation and Operating Effectiveness

Section VI: Control Objectives, Control Activities, Testing of Design and Implementation and Operating Effectiveness

Introduction

This section presents the following information provided by BoardRoom:

- The control objectives specified by the management of BoardRoom.
- The controls established and specified by BoardRoom to achieve the specified control objectives.

Also included in this section is the following information provided by Deloitte Risk Advisory Pty Ltd:

- A description of the tests performed by Deloitte Risk Advisory Pty Ltd to determine whether BoardRoom's controls were operating with sufficient effectiveness to achieve specified control objectives. Deloitte Risk Advisory Pty Ltd determined the nature, timing, and extent of the testing performed.
- The results of Deloitte Risk Advisory Pty Ltd's tests of controls.

It is each user's responsibility to evaluate the information included in this report in relation to internal control in place at individual user entities to obtain an understanding and to assess control risk at the user entities. The controls at user entities and BoardRoom's controls should be evaluated together. If effective customer controls are not in place, BoardRoom's controls may not compensate for such weaknesses.

Controls that are performed by BoardRoom's users remain their responsibility and were not tested as part of this engagement.

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Registry Controls - Control Objective 1

New accounts are set up completely and accurately in accordance with client agreements.

Control Reference	Control Activity	Test Procedures	Results of Tests
F1.1	Paper based new account requests are verified by BoardRoom clerical staff, entered into the registry platform by the Data Entry team, and reviewed by the Quality Assurance team.	<p>Inspected samples of listed and unlisted new and changed account application forms to ascertain whether the following occurred:</p> <ul style="list-style-type: none">• Sign-off by Clerical staff as evidence of verification for completeness of information and payment of fee for transfer.• Accuracy of data entry in SREG by the Data Entry team, substantiated by matching between paper request and SREG.• Sign-off by Quality Assurance as evidence of independent review.	No deviations noted.
F1.2	Online requests are subject to validation through the BoardRoom online system (InvestorServe).	<p>Enquired around the process for online request validation through the BoardRoom online system (InvestorServe).</p> <p>Observed a sample Masterfile change made within the InvestorServe Portal to test whether the process is as detailed above.</p>	No deviations noted.
F1.3	Agreements are negotiated and signed by all new clients. Deviations from standard contractual terms have to be approved by BoardRoom senior management.	Refer to Test Procedures for control F2.1.	No deviations noted.
F1.4	A new client set-up form and client agreement must be signed by BoardRoom Management.	Refer to Test Procedures for control F2.1	No deviations noted.

Registry Controls - Control Objective 2

Complete and authorised client agreements are established prior to initiating accounting activity

Control Reference	Control Activity	Test Procedures	Results of Tests
F2.1	New client agreements are negotiated and signed by BoardRoom management. Deviations from standard contractual terms are approved by BoardRoom's Senior Management.	Inspected samples of new client agreements to ascertain whether there was evidence of approval by the client and BoardRoom Senior Management.	No deviations noted.
F2.2	A new client set-up form and client agreement must be signed by BoardRoom management. Accounting activity shall not be initiated before the commencement date listed on the contract.	<p>Inspected samples of new client set-up forms and agreements to ascertain whether there was evidence of sign-off and approval by both the Client Service Manager and the CFO.</p> <p>For the selected samples, obtained evidence of the first accounting activity to ascertain whether these were subsequent to the commencement date in the signed contract and that deviations, if any, were approved.</p>	No deviations noted.

Registry Controls - Control Objective 3

New security holder activity is clearly established and recorded completely, accurately and in a timely manner.

Control Reference	Control Activity	Test Procedures	Results of Tests
F3.1	Documentary confirmation of a new security holding establishment is dispatched to the security holder within the timeframe set out in the ASX Listing Rules, ASX Settlement Operating Rules or the service levels contained in the client agreement, whichever is applicable. This is performed through automated batch jobs that are scheduled to print documentary confirmation of the holdings establishment.	<p>Inspected the system configuration for the daily and monthly batch jobs to ascertain whether holding statements were produced for new security holder activity.</p> <p>Inspected mailroom summary sheets and Australian Post e-LMS lodgement summary sheets to ascertain whether all mail-outs were lodged on the same day.</p> <p>Inspected a sample of the automated text file report for successful batch jobs, timeliness of lodgement, and system generated notification for failed batch jobs.</p>	<p>No deviations noted.</p>
F3.2	Monitoring controls are in place to ensure accurate and correct statements are printed and dispatched.	Observed the Mailroom staff print the holding statements and perform the charge sheet reconciliation. Inspected samples of reconciliations to ascertain whether all printed holding statements were logged in the charge sheet and timely dispatched as evidenced by the Australia Post Statement.	<p>Deviation noted.</p> <p>Reconciliation processes between the SREG summary sheet, Machine Count Sheet, and AusPost eLMS statement are performed but sufficient evidence is not retained:</p> <ul style="list-style-type: none">• For 8 out of 15 samples, the calculations were handwritten• For 3 out of 15 samples, the calculations were recorded in a formal sheet• For 4 out of 15 samples, there was no evidence of calculations being performed. <p>For all 15 samples, we were unable to determine how the totals were reconciled between the Machine Count Sheet, and the AusPost eLMS statement due to insufficient retention of evidence.</p>

Control Reference	Control Activity	Test Procedures	Results of Tests
F3.3	Paper-based account requests are verified by BoardRoom clerical staff, entered into the registry platform by the data entry team and reviewed by the Quality Assurance team.	<p>Inspected samples of new client agreements to ascertain whether there was evidence of approval by the client and BoardRoom management.</p> <p>Inspected samples of listed and unlisted account application forms to ascertain whether there was evidence of the following:</p> <ul style="list-style-type: none"> • Sign-off by Clerical staff as evidence of verification for completeness of information and payment of fee for transfer • Accuracy of data entry in SREG by the Data Entry team; substantiated by matching between paper request and SREG • Sign-off by Quality Assurance as evidence of independent review. 	No deviations noted.
F3.4	Electronic account requests through CHES are automatically assessed by the system. If rejected, two BoardRoom staff will review the request before making a final decision.	Inspected samples of electronic account requests through CHES which were rejected by SREG due to inconsistent information to ascertain whether they were validated by two Client Service officers and the discrepancies were resolved.	No deviations noted.
F3.5	Online requests are subject to validation through the BoardRoom online system (InvestorServe).	Refer to Test Procedures for control F1.2.	No deviations noted.

Control Reference	Control Activity	Test Procedures	Results of Tests
F3.6	Applications received through mFund and Calastone are processed in SREG by the unlisted application processing team which are peer reviewed prior to allotment of units.	<p>(a) Listed clients</p> <p>Inspected samples of monetary receipts for listed clients to ascertain whether the following occurred:</p> <ul style="list-style-type: none"> Bank reconciliation was performed by the Corporate Actions Officer and discrepancies, if any, were investigated and resolved. Payment details from the Corporate Application Forms agree with the bank statement and the Final Detailed list report extracted from SREG. <p>(b) Unlisted clients</p> <p>Inspected samples of monetary receipts for unlisted clients to ascertain whether the following occurred:</p> <ul style="list-style-type: none"> Reconciliation was performed by the Unlisted Admin Team and discrepancies, if any, were investigated and resolved. Payment details in the Transaction History report generated from SREG agree with the client's bank statement. 	No deviations noted.
F3.7	A new client set-up form and client agreement must be signed. Accounting activity cannot be initiated before the commencement date listed on this contract.	Refer to Test Procedures for control F2.2.	No deviations noted.

Registry Controls - Control Objective 4

Security holder documents received are checked, sorted and distributed for processing in a timely manner.

Control Reference	Control Activity	Test Procedures	Results of Tests
F4.1	All paper documentation received is sorted by the Mail Room Team, stamped with the date of receipt and delivered to the relevant staff member as soon as practicable.	<p>Inspected onsite the sample mail tracking form for courier mail to assess that:</p> <ul style="list-style-type: none">• Logged with its description and date of receipt by the Mailroom staff• Acknowledged as received on the same day by the staff member assigned to process the transaction• Signoffs are attained from both the Mailroom Staff and the individual in which the mail is directed to.	<p>Deviation noted.</p> <p>For 2 out of 15 standard mail samples and for 1 out of 15 urgent mail samples, recipient signatures were missing. Noted for all three mails without recipient signatures, signoff was obtained by the Mailroom staff.</p>

Registry Controls - Control Objective 5

Investor transactions and adjustments are authorised, processed accurately, completely and in a timely manner.

Control Reference	Control Activity	Test Procedures	Results of Tests
F5.1	Investor transactions are subject to review by the BoardRoom Quality Assurance Team who compare the original documentation to the information entered in the system.	Refer to Test Procedures for control F1.1.	No deviations noted.
F5.2	Automated transactions are managed through the ASX CHESS System. The BoardRoom registry platform is accredited by ASX.	<p>Inspected the Technical Accreditation certification granted by the ASX Settlement Corporation on an annual basis to ascertain whether the SReg system meets the technical requirements in the receipt of input messages from and transmission of output messages to CHESS.</p> <p>Refer to Test Procedures for control F10.3 for management of automated transactions through CHESS.</p>	No deviations noted.

Control Reference	Control Activity	Test Procedures	Results of Tests
F5.3	All paper documentation received is sorted by the Mail Room Team, stamped with the date of receipt and delivered to the relevant staff member as soon as practicable.	Refer to Test Procedures for control F4.1.	No deviations noted.
F5.4	Applications for managed fund service (mFund) received through CHES are processed in SREG by the Unlisted Application Processing Team which are peer reviewed prior to allotment of units.	<p>Inspected samples of investor transactions for unlisted clients to ascertain whether the following occurred:</p> <ul style="list-style-type: none"> • Unit price for allotment of units match with the instructions provided by the client • Cash clearance was checked by the Unlisted Validation team prior to allotment of units as evidenced on the order history • Application was processed within the same day. 	No deviations noted.
F5.5	Applications received through Calastone are processed in SREG by the Unlisted Application Processing Team which are peer reviewed prior to allotment of units.	Refer to Test Procedures for control F3.6	No deviations noted.

Registry Controls - Control Objective 6

Cash receipts are processed accurately and banked promptly.

Control Reference	Control Activity	Test Procedures	Results of Tests
F6.1	Monetary receipts (regardless of source) are reconciled daily. Discrepancies identified (if any) are investigated and resolved prior to securities being allotted.	<p>(a) Listed clients</p> <p>Inspected samples of monetary receipts for listed clients to ascertain whether the following occurred:</p> <ul style="list-style-type: none">• Bank reconciliation was performed by the Corporate Actions Officer and discrepancies, if any, were investigated and resolved.• Payment details from the Corporate Application Forms agree with the bank statement and the Final Detailed list report extracted from SREG.	No deviations noted.
F6.2	Monetary receipts (regardless of source) are reconciled daily. Discrepancies identified (if any) are investigated and resolved prior to securities being allotted.	<p>(b) Unlisted clients</p> <p>Inspected samples of monetary receipts for unlisted clients to ascertain whether the following occurred:</p> <ul style="list-style-type: none">• Reconciliation was performed by the Unlisted Admin Team and discrepancies, if any, were investigated and resolved• Payment details in the Transaction History report generated from SREG agree with the client's bank statement.	No deviations noted.

Registry Controls - Control Objective 7

EFT files, cheques and payment confirmations are generated, matched and authorised prior to issuance.

Control Reference	Control Activity	Test Procedures	Results of Tests
F7.1	A signed/approved calculation sheet is a prerequisite before cheques and/or electronic fund transfer (EFT) files are created.	Inspected samples of duly accomplished and approved calculation sheets to ascertain whether these were approved prior to date of payment to the investors.	No deviations noted.
F7.2	Prior to dispatch of cheques and any paper-based EFT payment confirmation notices, a quality assurance check is carried out by the Quality Assurance Team to assess the accuracy of the beneficiary name, bank account number and payment amount against the system.	Inspected samples of calculation forms and corresponding supporting documentation (e.g.: payment sheets) to ascertain whether the payment information (e.g. total cash distribution and withholding tax) were accurate and there was evidence of quality assurance checks.	No deviations noted.
F7.3	EFT files are either sent to the client for upload to the corresponding bank or are uploaded by BoardRoom for processing against the client's bank account in accordance with the authority granted to BoardRoom.	<p>Inspected samples of calculation forms and supporting client approval to ascertain whether the following occurred:</p> <ul style="list-style-type: none">• Bank account information where dividend payments were made is accurately recorded; substantiated by matching between original documentation and data entries.• Dividends were paid to the correct bank account as instructed by the client by tracing the dividends paid to the EFT transfer records.	No deviations noted.
F7.4	For EFT files loaded by BoardRoom, proof of funding of the bank account is necessary before approval by two Senior BoardRoom Managers to authorise the transaction.	Inspected samples of calculation forms and corresponding supporting documentation (e.g.: payment sheets) to ascertain whether approval by two senior BoardRoom managers was obtained after the proof of funding was received.	No deviations noted.

Registry Controls - Control Objective 8

Where issued capital is fixed, the number of securities in the registry records match the number of securities on issue.

Control Reference	Control Activity	Test Procedures	Results of Tests
F8.1	For clients with fixed capital, the total securities issued are accurately reflected in the registry records.	Not applicable – BoardRoom does not have any existing clients with fixed capital.	Not applicable – BoardRoom does not have any existing clients with fixed capital.

Registry Controls - Control Objective 9

Distribution payments and reinvestments are complete, calculated in accordance with the authorised distribution and processed timely.

Control Reference	Control Activity	Test Procedures	Results of Tests
F9.1	Distribution payments are calculated in accordance with information supplied by the client. Payment is not made unless the calculation has been agreed by the client.	<p>Inspected samples of duly accomplished and approved payment checklists to ascertain whether these were approved prior to date of payment to the investors.</p> <p>Inspected samples of payment checklists and supporting documentation (e.g. calculation forms, payment sheets) to ascertain accuracy of payment information (e.g. total cash distribution and withholding tax) and evidence of quality assurance checks. Inspected samples of calculation forms and supporting client approval to ascertain whether the following occurred:</p> <ul style="list-style-type: none">• Bank account information where dividend payments were made is accurately recorded; substantiated by matching between original documentation and data entries.• Dividends were paid to the correct bank account, as instructed by the client by tracing the dividends paid to the EFT transfer records.• Calculation forms were signed off by the Quality Assurance team prior to provisioning of payment.• Payment checklists were finalised and a listing of payments were issued to the client. Inspected samples of payment sheets to ascertain whether approval by two senior BoardRoom managers was obtained.	No deviations noted.
F9.2	Prior to provision of the calculation to the client, the results are checked by BoardRoom's Quality Assurance Team to ensure the correct parameters for the calculation have been used.	Refer to Test Procedures for control F7.2.	No deviations noted.

Control Reference	Control Activity	Test Procedures	Results of Tests
F9.3	A payment checklist is completed to evidence finalisation of key tasks throughout the process.	Refer to Test Procedures for control F9.1.	<p>Deviation noted.</p> <p>For 1 out of 25 samples, the payment checklist was not signed by a Payments Officer prior to dispatch of funds.</p>

Registry Controls - Control Objective 10

Accounts are administered in accordance with client agreements.

Control Reference	Control Activity	Test Procedures	Results of Tests
F10.1	BoardRoom's Quality Assurance Team ensure the accuracy of manual transaction processing by matching the information processed to the source documents and master data contained in SREG. Verification of transactional information entered into the registry system is undertaken.	Refer to Test Procedures for control F1.1.	No deviations noted.
F10.2	Paper-based account requests are verified by the BoardRoom Clerical Staff, entered into the registry platform (SREG) by the Data Entry Team and reviewed by the Quality Assurance Team.	Refer to Test Procedures for control F1.1.	No deviations noted.
F10.3	Electronic account requests through CHESS are automatically assessed by the system. If rejected, two BoardRoom Staff review the request before making a final decision.	Refer to Test Procedures for control F3.4.	No deviations noted.
F10.4	Online requests are subject to validation through the BoardRoom online system (InvestorServe).	Refer to Test Procedures for control F1.2.	No deviations noted.
F10.5	Agreements are negotiated and signed with all new clients. Deviations from standard contractual terms require approval by BoardRoom senior management.	Refer to Test Procedures for control F2.1.	No deviations noted.

Registry Controls - Control Objective 11

Changes to non-monetary client data (for example, address changes and changes in allocation instructions) are authorised and correctly recorded on a timely basis.

Control Reference	Control Activity	Test Procedures	Results of Tests
F11.1	BoardRoom's Quality Assurance Team ensures the accuracy of non-monetary client data change processing. A manual verification of changes entered into the registry system is undertaken	Refer to Test Procedures for control F1.1	No deviations noted.

Registry Controls - Control Objective 12

Registrar records accurately reflect securities and cash held by third parties.

Control Reference	Control Activity	Test Procedures	Results of Tests
F12.1	BoardRoom records any liens or a registry of cash for securities held with third parties. <i>BoardRoom does not record liens nor manage registers of cash or securities held with third parties.</i>	Not applicable	Not tested, not applicable.

Registry Controls - Control Objective 13

Security activity is recorded completely and accurately, where changes to balances are regularly reconciled.

Control Reference	Control Activity	Test Procedures	Results of Tests
F13.1	BoardRoom's Quality Assurance Team monitors all changes in issued capital due to application, redemption, cancellation or dividend reinvestment plan allotments to verify that these changes are properly authorised and processed transactions.	Enquired with the Quality Assurance team and observed the automated generation and sending of the 'Manual Total Security Balances vs System' report by SREG which logs all the movements in a client's capital. Observed the Quality Assurance officer performing an on-screen review of the report to ascertain whether changes were properly authorised, processed and any discrepancies were resolved in coordination with the Processing team.	No deviations noted.

Control Reference	Control Activity	Test Procedures	Results of Tests
F13.2	A Triple X Report is automatically generated on a daily basis to compare the combined balances of CHES and issuer sponsored sub registers with the balances as per SREG.	<p>Enquired with the Quality Assurance team and observed the automated generation and sending of the 'Triple X' report by SREG which compares the combined balances of CHES and issuer sponsored sub-registers with BoardRoom's balances.</p> <p>Observed the Quality Assurance officer perform an on-screen review of the report to ascertain whether changes were properly authorised, processed and any discrepancies were resolved in coordination with the Processing team.</p>	No deviations noted.

Registry Controls - Control Objective 14

Lost, stolen and balance transfer certificates are recorded in a timely manner.

Control Reference	Control Activity	Test Procedures	Results of Tests
F14.1	Lost, stolen and balance transfer certificates are processed by Client Service Officers within thirty business days in alignment with the Corporations Act.	Inspected samples of replacement certificates issued for lost, stolen and balance transfer certificates to ascertain whether these were supported by accomplished certification replacement request forms of the security holder, which were signed-off by the Client Service Officer as evidence of processing within agreed service levels.	<p>Deviation noted.</p> <p>For 1 out of 4 samples, the balance transfer certificate was issued 29 days after the request was submitted. This exceeds the client's agreed service levels which state that registry transactions must be processed within 2 business days.</p>

Control Reference	Control Activity	Test Procedures	Results of Tests
F14.2	Where a certificate has been reported lost or stolen, a replacement is only issued once the security holder completes a request form and a statement providing the information required under the Corporations Act. In the instance of a balance certificate issue, the previous balance must reconcile against the new statement.	Inspected samples of lost, stolen and balance transfer certificates to ascertain whether these were supported by accomplished certification replacement request forms. Inspected that all issuance balance transfer certificates were supported by the previous balance certificate issue.	No deviations noted.
F14.3	The request form is validated by the Client Service Officer, entered into the registry platform by the Data Entry Team and reviewed by the Quality Assurance Team.	Inspected samples of certification replacement request forms to ascertain whether these were signed-off by the Client Service Officer, Data Entry Team and Quality Assurance team.	No deviations noted.

Registry Controls - Control Objective 15

Transaction errors are identified, notified to clients in accordance with client agreements and rectified if necessary.

Control Reference	Control Activity	Test Procedures	Results of Tests
F15.1	All manual transactions are subject to checking by the Quality Assurance Team and any errors are rectified by re-entering the data.	Refer to Test Procedures for control F10.1.	No deviations noted.
F15.2	For clients which issue units in a managed investment scheme, a Compliance Report must be completed and lodged with the client for review as part of the regular reporting required under the client agreement. The Compliance report details any errors discovered, steps taken to rectify and actions to prevent recurrence.	<p>Inspected the compliance calendar which outlines frequency of compliance reporting for unlisted clients, as per the agreement with the client.</p> <p>Inspected Client Online portal and performed sample testing to assess these reports are identical to reports generated directly from SREG and ascertained whether the content was in line with the agreement, was reviewed by the Client Service Manager prior to issue and included details of any errors discovered.</p>	<p>Deviation noted.</p> <p>For 5 out of 5 samples, the compliance reports were created outside the service level agreement with the client.</p>
F15.3	An Incident and Complaints process is in place which dictates the required actions to be performed as errors are identified.	Inspected the BoardRoom Incident and Complaint Review Process and Incident Reporting Requirements to ascertain whether guidelines were defined and established for managing identified errors that can potentially affect BoardRoom and its clients.	No deviations noted.

Registry Controls - Control Objective 16

Appointments of subservice organisations, including those providing registry services, are approved, subservice organisation are properly managed and their activities adequately monitored on a timely basis.

Control Reference	Control Activity	Test Procedures	Results of Tests
F16.1	BoardRoom conducts due diligence over subservice organisations upon commencement of relationships. Due diligence is also conducted at the time of renewal of relationship, which also takes into account the overall management and performance of the subservice organisation.	Inspected questionnaires to ascertain whether due diligence was completed for the subservice organisations which provide print and mail facility services to BoardRoom.	No deviations noted.
F16.2	Reconciliation processes are in place to verify that subservice organisational processing is complete and accurate.	Observed the Mailroom staff print the holding statements and perform the charge sheet reconciliation. Inspected samples of reconciliations to ascertain whether all printed holding statements were logged in the charge sheet and timely dispatched as evidenced by the Australia Post Statement.	Deviations noted. Reconciliations between the charge sheet and holding statements were not performed throughout the audit period.

Registry Controls - Control Objective 17

Client reporting is complete and accurate and processed within timescales.

Control Reference	Control Activity	Test Procedures	Results of Tests
F17.1	BoardRoom provides compliance reports via email or a secure portal to unlisted clients based on the client's requirements as stipulated in the Service Level Agreement.	<p>Inspected the compliance calendar which outlines frequency of compliance reporting for unlisted clients, as per the agreement with the client.</p> <p>Inspected Client Online portal and performed sample testing to assess that these reports are identical to reports generated directly from SREG and ascertained whether the content was in line with the agreement, was reviewed by the Client Service Manager prior to issue and included details of any errors discovered.</p>	<p>Deviation noted.</p> <p>For 5 out of 5 samples, the compliance reports were created outside the service level agreement with the client.</p>
F17.2	Daily application system processing within SREG is scheduled via automated techniques.	Inspected the registry system configuration to ascertain whether system processing was automatically scheduled.	No deviations noted.

Registry Controls - Control Objective 18

Withholding tax for non-residents, or where no TFN/ABN has been provided, is calculated completely, accurately on a timely basis.

Control Reference	Control Activity	Test Procedures	Results of Tests
F18.1	Where no TFN/ABN has been provided, withholding tax is calculated as part of the standard payment process. Cheques and/or EFT files are only created as part of the payment process following receipt of a signed/approved calculation sheet from the relevant client.	Inspected the configuration for payments within the system to determine whether tax is automatically withheld for cases where there were no TFN/ABN provided. Additionally, for a sample from the audit period, determined whether Tax was withheld and communicated to the client prior to processing the payment via Secure Online Portal.	No deviations noted.
F18.2	Prior to dispatch of cheques and any paper-based EFT payment confirmation notices, a quality assurance check on a random sample of these documents is performed.	Inspected samples of payment checklists and supporting documentation (e.g. calculation forms, payment sheets) that were subject to the quality assurance check to ascertain whether the payment information (e.g. total cash distribution and withholding tax) was correct.	No deviations noted.
F18.3	Electronic listed account transfers received through CHESS are automatically checked by SREG. If rejected, two Client Service Officers perform a review and investigation before manually accepting the transaction for successful transfer.	Refer to Test Procedures for control F3.4.	No deviations noted.
F18.4	Paper-based account requests are verified by BoardRoom clerical staff, entered in the registry platform by the data entry team and reviewed by the Quality Assurance team.	Refer to Test Procedures for control F10.2.	No deviations noted.

Information Technology - Control Objective 1

Physical access to computer networks, equipment, storage media and program documentation is restricted to authorised individuals.

Control Reference	Control Activity	Test Procedures	Results of Tests
G1.1	BoardRoom's processing equipment is situated in a third-party site managed by Optus. Access to this site is limited to restricted personnel including the System Administrator, CIO and General Manager, Corporate Governance.	<p>Enquired with BoardRoom and corroborated with Optus whether access to the site was limited to the System Administrators, Chief Information Officer and General Manager, Corporate Governance.</p> <p>Inspected access lists to ascertain whether data centre access was appropriately maintained and access was limited to authorised personnel.</p>	No deviations noted.
G1.2	BoardRoom's disaster recovery equipment is maintained in a different location to processing equipment site and access to this site is limited to authorised personnel.	<p>Enquired with BoardRoom and corroborated with Optus whether disaster recovery equipment was maintained offsite and that access to the site was limited to System Administrator, Systems Engineer, Manager, Technical Operations, and General Manager, Corporate Governance.</p> <p>Inspected access lists to ascertain whether disaster recovery equipment was appropriately maintained and access was limited to authorised personnel.</p>	No deviations noted.

Control Reference	Control Activity	Test Procedures	Results of Tests
G1.3	Onsite processing equipment in BoardRoom's premises is secured in a locked room accessible only to authorised personnel.	<p>Enquired with BoardRoom whether:</p> <ul style="list-style-type: none"> Access to the premises was limited to BoardRoom staff. Access provisioning and termination follow BoardRoom's standard process of on-boarding new employees and terminating resigned employees. Swipe cards were given upon approval by management and must be returned upon the employee's termination/exit. <p>Observed that controls to secure access to BoardRoom premises via swipe cards are required to enter the premises.</p>	No deviations noted.

Information Technology - Control Objective 2

Logical access to computer systems, programs, master data, transaction data and parameters, including access by administrators to applications, databases, systems and networks, is restricted to authorised individuals via information security tools and techniques.

Control Reference	Control Activity	Test Procedures	Results of Tests
G2.1	Registry system access is configured to implement password settings that comply with BoardRoom's Security Policy.	Inspected the password parameter configuration in SREG to ascertain whether it meets the defined requirements as per BoardRoom's Security Policy.	No deviations noted.
G2.2	Each user is assigned a unique user ID for SREG.	Inspected the BoardRoom registry system access listing to ascertain whether each user was assigned a unique user ID.	No deviations noted.

Control Reference	Control Activity	Test Procedures	Results of Tests
G2.3	Administrator access is restricted to authorised users via management approval from the application owner.	Inspected the listing of users with privileged access to ascertain whether they had rights suitable for their roles and responsibilities. Obtained confirmation from management and validated this against the BoardRoom organisational chart to ascertain whether users with privileged access to SREG were appropriate.	No deviations noted.
G2.4	New and terminated users require a mantis ticket to be logged, approved by management and processed by the IT Department.	<p><i>Access Granting</i></p> <p>Inspected samples of users granted new access to SREG within the review period to ascertain whether:</p> <ul style="list-style-type: none"> • A mantis ticket was raised to request for SREG access. • Granting of access was approved by management and in alignment with access requested. <p><i>Access Termination</i></p> <p>Inspected samples of employees that were terminated from the organisation within the review period to ascertain whether:</p> <ul style="list-style-type: none"> • A mantis ticket was raised to terminate the SREG access where an employee had access • Removal of access to SREG was approved by management and performed in a timely manner. 	No deviations noted.

Control Reference	Control Activity	Test Procedures	Results of Tests
G2.5	Remote access to the registry system requires approval by BoardRoom's management.	<p>Inspected the Pandemic (COVID-19) Policy to ascertain procedures in place to permit remote access working, including the provisioning of remote access.</p> <p>Inspected samples of new users within the period covered to ascertain whether:</p> <ul style="list-style-type: none"> A mantis ticket was raised to request for VPN access Granting of remote access was approved by management. 	No deviations noted.
G2.6	Logs of changes made to a Customer Master File in SREG are logged in change history.	Observed system configuration to ascertain that the changes made to the Customer Master File were automatically logged and maintained in the system change history.	No deviations noted.

Information Technology - Control Objective 3

Segregation of incompatible duties is defined, implemented and enforced by logical security controls in accordance with job roles.

Control Reference	Control Activity	Test Procedures	Results of Tests
G3.1	Access to the register maintenance system (SREG) is limited and individually tailored based on the functions in accordance with the user's role.	Inspected the user access review results to ascertain whether access to CHESS messages and access to create users in SREG was restricted to privileged users and to ascertain whether the user access review performed evaluates appropriateness of the access based on the user's role and functions.	No deviations noted.

Control Reference	Control Activity	Test Procedures	Results of Tests
G3.2	A user access review on the privileges of the users in SREG is conducted annually by the General Manager Corporate Governance.	Inspected the user access review results to ascertain whether a review was conducted in coordination with the respective departmental managers; and that actions identified on the basis of review were timely and accurately implemented.	No deviation noted.
G3.3	Granting, altering and terminating user access requires a Mantis tickets to be logged, approved by management and processed by the IT Department.	Refer to Test Procedures for control G2.4.	Deviation noted. For 1 out of 15 samples, the Mantis ticket for terminating access was not raised timely following the user's termination.
G3.4	An automated system control is in place requiring all transactions that impact a holder's balance (shares, units, notes, options etc.) to be approved by two (2) authorisers prior to release.	Inspected the system configuration to ascertain whether segregation of duties exist in SREG to restrict the preparer from authorising a transaction.	No deviations noted.

Information Technology - Control Objective 4

IT processing is authorised and scheduled appropriately and exceptions are identified and resolved in a timely manner.

Control Reference	Control Activity	Test Procedures	Results of Tests
G4.1	Administrative access to make changes to the batch/backup job schedules is restricted to authorised users within the IT Department.	<i>Batch Job Schedules</i> Inspected all users with access to the batch job in SREG to generate internal and external reports to ascertain whether they were appropriate in line with their job function. <i>Back-up Job Schedules</i> Inspected all users with access to the back-up job within the Oracle database to ascertain whether they were appropriate in line with their job function.	No deviations noted.
G4.2	Oracle backups occur on a daily basis with automated email alerts notifying success/failure.	Inspected the back-up schedule configuration to ascertain that back-up procedures were scheduled daily. Inspected the automated email alerts sent to the System Administrators and IT personnel to ascertain whether notifications on back-up success/failure were sent to appropriate personnel.	No deviations noted.

Information Technology - Control Objective 5

Appropriate measures, including firewalls and anti-virus software, are implemented to counter the threat from malicious electronic attack.

Control Reference	Control Activity	Test Procedures	Results of Tests
G5.1	BoardRoom maintains up-to-date virus protection software used to scan all incoming mail and data held on shared drives.	Inspected the current version of CrowdStrike EndPoint Protection anti-virus software dashboard to ascertain whether up-to-date protection was in place across BoardRoom workstations and servers.	No deviations noted.

Control Reference	Control Activity	Test Procedures	Results of Tests
G5.2	BoardRoom has firewall protection in place at both data centres.	Enquired with the General Manager, IT and inspected screenshots of the SonicWall Firewall Configuration to ascertain that firewall protection was in place at all data centres.	No deviations noted.

Information Technology - Control Objective 6

The physical IT equipment is maintained in a controlled environment.

Control Reference	Control Activity	Test Procedures	Results of Tests
G6.1	<p>The main processing site (Optus), the BoardRoom computer room and the disaster recovery site (Vocus) are all climatically controlled installations. These include the following:</p> <ul style="list-style-type: none"> • Air-conditioning • Fire protection • Elevated flooring • Generator on roof • UPS 	Obtained support tickets and inspected SOC reports from third parties to assess whether environmental controls are in place, including air-conditioning, fire protection, elevated flooring, generators and UPS. Inspected SOC reports to ascertain whether the same environmental controls were in place in the data recovery site.	No deviations noted.
G6.2	<p>Security controls in place at the Optus data centre include:</p> <ul style="list-style-type: none"> • 24/7 security guards • Swipe card access • Key to BoardRoom rack only • Mantrap • CCTV cameras • Visitor log book 	Obtained support ticket and inspected SOC report from the Optus data centre to ascertain whether security controls to the site were in place, including a security guard, swipe cards, keys, CCTV cameras, mantrap and logbooks.	No deviations noted.

Information Technology - Control Objective 7

Development and implementation of new systems, applications and software, and changes to existing systems, applications and software, are authorised, tested, approved, implemented and documented.

Control Reference	Control Activity	Test Procedures	Results of Tests
G7.1	A documented policy/procedure is in place and used to guide the change management process.	Inspected the BAU Support and Maintenance Process Flow and Operating Model to ascertain whether procedures were defined to guide the change management process.	No deviations noted.
G7.2	Testing is performed in a separate testing environment before going live as defined in BoardRoom's policy/procedure. Segregation of Duties is maintained between the testing and production environment.	Inspected on-screen the SREG development, pre-production and production environments to ascertain that test environments were separate. Inspected samples of changes implemented in SREG within the review period to ascertain whether changes were tested by a user different to the user who promoted the change to the production environment.	No deviations noted.
G7.3	All changes are logged and monitored in the Mantis Help Desk System and require approval by management before going live.	<p>Inspected samples of changes performed in SREG within the review period to ascertain whether:</p> <ul style="list-style-type: none">• Changes were raised, logged and monitored in the Mantis Help Desk System• Changes were tested prior to implementation• Changes were approved prior to implementation.	No deviations noted.
G7.4	Changes undergo formal user acceptance and/or technical testing to ensure appropriateness prior to implementation.	<p>Inspected samples of changes implemented in SREG within the period covered to ascertain whether:</p> <ul style="list-style-type: none">• Change testing was performed in the User Acceptance Testing (UAT) environment, with any issues resolved prior to approval.	No deviations noted.

Information Technology - Control Objective 8

Data migration or modification is authorised, tested and once completed, is reconciled back to the source data.

Control Reference	Control Activity	Test Procedures	Results of Tests
G8.1	Migration of data is tested and reconciled against reports provided by the previous supplier before being released for general access.	<p>Inspected samples of data migrations to ascertain whether:</p> <ul style="list-style-type: none">• A Transition Plan was completed to evidence that testing and reconciliations were performed prior to migration• A Data Testing Plan was completed to evidence that migrated data was complete and accurate.	No deviations noted.

Information Technology - Control Objective 9

Data and systems are backed up regularly, retained offsite and regularly tested for recoverability.

Control Reference	Control Activity	Test Procedures	Results of Tests
G9.1	BoardRoom has dedicated data links among the two sites (Prod and DR). The primary registry system database located hosted by Optus is replicated at the Vocus DR site every 10 minutes.	Inspected the log shipping schedule to ascertain whether data was replicated every three minutes from the primary registry system database to the DR site.	No deviations noted.
G9.2	A daily back-up is performed of the registry system database. If the backup fails to complete, it is rerun overnight.	Inspected the back-up schedule configuration to ascertain whether back-up procedures were scheduled. Further inspected the automated email alert generated upon back-up completion to determine whether the System Administrators and IT personnel were notified.	No deviations noted.
G9.3	Restoration testing is performed by the Systems Administrator at least annually. Results are tracked and recorded in the test cases.	Inspected the Business Continuity Plan (BCP) and Disaster Recovery Plan (DRP) and Test Case Results to ascertain whether a plan was established for restoration testing. Inspected BCP exercises to ascertain whether restoration testing was performed and test results were tracked and recorded.	No deviations noted.
G9.4	Administrative access to make changes to the batch/back-up job schedules is restricted to authorised users within the IT Department.	<p><i>Batch Job Schedules</i></p> <p>Inspected users with access to the batch job within SREG to generate internal and external reports to ascertain whether these were appropriate in line with their job function.</p> <p><i>Back-up Job Schedules</i></p> <p>Inspected users with access to the back-up job within the Oracle database to ascertain whether these were appropriate in line with their job function.</p>	No deviations noted.

Information Technology - Control Objective 10

IT hardware and software issues are monitored and resolved in a timely manner.

Control Reference	Control Activity	Test Procedures	Results of Tests
G10.1	All requests for enhancement and notification of errors is logged in the IT Help Desk System.	<p>Inspected samples of errors and incidents within the covered period to ascertain whether the following occurred:</p> <ul style="list-style-type: none">• Error or incident was documented and raised via Mantis• Error or incident was actioned by an IT Help Desk personnel• Error or incident was resolved and closed accordingly. <p>Inspected the BAU Support and Maintenance Process Flow and Operating Model to ascertain whether procedures were defined to guide the incident management process.</p> <p>Inspected samples of incidents in SREG within the period covered to ascertain whether incidents were resolved timely.</p>	No deviations noted.
G10.2	OpsGenie automatically raises security alerts to the Technical Operations Team. Mantis tickets are manually raised for any security incidents.	<p>Inspected system configuration to ascertain whether the Mantis tool automatically alerts the IT Help Desk for incidents and Technical Operations for change requests via email. Inspected a sample email notification that was received by the IT Help Desk and Technical Operations.</p>	No deviations noted.

Information Technology - Control Objective 11

Disaster recovery tests of IT links are performed annually.

Control Reference	Control Activity	Test Procedures	Results of Tests
G11.1	BoardRoom has a formal Business Continuity Plan and Disaster Recovery Plan which are updated on a regular basis.	Inspected the Business Continuity Plan (BCP) to ascertain whether a plan was established and updated on an annual basis.	No deviations noted.
G11.2	Disaster recovery tests of IT links are performed annually	Inspected the BCP and DRP Test Case Results to ascertain whether exercises were performed and documented on an annual basis.	No deviations noted.

Information Technology - Control Objective 12

Information technology services provided to clients are approved, managed and performance thresholds met in accordance with the requirements of the client agreement.

Control Reference	Control Activity	Test Procedures	Results of Tests
G12.1	Not Applicable – BoardRoom does not provide Information Technology services to clients.	Not applicable	Not tested, not applicable.

Information Technology - Control Objective 13

Outsourced activities are approved and managed in accordance with an approved contract.

Control Reference	Control Activity	Test Procedures	Results of Tests
G13.1	BoardRoom outsources its equipment hosting, communication links and maintenance support for database management to third parties in accordance with an approved contract.	Obtained and inspected contractual agreements to ascertain whether BoardRoom applied third-party oversight for equipment hosting, communication links and maintenance support for database management services from third parties.	No deviations noted.

Section VII:
Other Information
Provided by the Service
Organisation that does not
form part of Deloitte Risk
Advisory Pty Ltd's Opinion

Section VII: Other Information provided by the Service Organisation that does not form part of Deloitte Risk Advisory Pty Ltd's Opinion

The information included in this Section of the report is presented by BoardRoom to provide additional information to customers and is not part of the BoardRoom's description of the system nor the Service Auditor's Assurance Report.

The information included in this Section has not been subjected to the test procedures performed by the service auditor as detailed in Section VI, accordingly, Deloitte Risk Advisory Pty Ltd does not express an opinion on it.

Management's response to deviations noted:

Control Reference	Control Activity	Deviation Noted	Management Response
F3.2	Monitoring controls are in place to ensure accurate and correct statements are printed and dispatched.	<p>Reconciliation processes between the SREG summary sheet, Machine Count Sheet, and AusPost eLMS statement are performed but sufficient evidence is not retained:</p> <ul style="list-style-type: none"> For 8 out of 15 samples, the calculations were handwritten For 3 out of 15 samples, the calculations were recorded in a formal sheet For 4 out of 15 samples, there was no evidence of calculations being performed. <p>For all 15 samples, we were unable to determine how the totals were reconciled between the Machine Count Sheet, and the AusPost eLMS statement due to insufficient retention of evidence.</p>	<p>As part of BoardRoom's continuous improvement process a staff member implemented an efficiency modification in the mail room. Unfortunately, the change removed the evidentiary component that demonstrated the continued application of the control.</p> <p>The controls evidence has now been reinstated</p>
F4.1	All paper documentation received is sorted by the Mail Room Team, stamped with the date of receipt and delivered to the relevant staff member as soon as practicable.	For 2 out of 15 standard mail samples and for 1 out of 15 urgent mail samples, recipient signatures were missing. Noted for all three mails without recipient signatures, signoff was obtained by the Mailroom staff.	This issue arose in the same manner as that identified in F3.2. That is, as part of BoardRoom's continuous improvement process a staff member implemented an efficiency modification in the mail room. Unfortunately, the

			change removed the evidentiary component that demonstrated the continued application of the control.
			The controls evidence has now been reinstated
F9.3	A payment checklist is completed to evidence finalisation of key tasks throughout the process.	For 1 out of 25 samples, the payment checklist was not signed by a Payments Officer prior to dispatch of funds.	All payments team members are undergoing refresher training in respect of the requirement for the payment checklist to be signed by a Payments Officer.
F14.1	Lost, stolen and balance transfer certificates are processed by Client Service Officers within thirty business days in alignment with the Corporations Act.	For 1 out of 4 samples, the balance transfer certificate was issued 29 days after the request was submitted. This exceeds the client's agreed service levels which state that registry transactions must be processed within 2 business days.	<p>This has highlighted a mismatch between the regulatory requirements in respect of certificates and the Service Levels contained in client contracts. The regulatory requirements should apply (in line with the requirement to maintain registers in accordance with the regulatory requirements) unless there is specific provisions to the contrary.</p> <p>To address this, a project is being undertaken to better align the Service Levels in contract of clients where certificates are required to be produced, with the Corporations Act provisions and client expectations.</p>
F15.2	For clients which issue units in a managed investment scheme, a Compliance Report must be completed and lodged with the client for review as part of the regular reporting required under the client agreement. The Compliance report details any errors discovered, steps taken to rectify and actions to prevent recurrence.	For 5 out of 5 samples, the compliance reports were created outside the service level agreement with the client.	<p>Two (2) root causes have been identified for the delays submitting compliance reports to clients identified. These are:</p> <ul style="list-style-type: none"> a) Staffing issues associated with absences through illness during the pandemic, as well as new and inexperienced staff; b) The above root cause led to there being Incomplete or delayed investigation of incidents that are to be included in the report. <p>Action plans have been developed to deal with both of these issues and will</p>

			be implemented as from and including the July 2022 reporting.
F16.2	Reconciliation processes are in place to verify that subservice organisational processing is complete and accurate.	Reconciliations between the charge sheet and holding statements were not performed throughout the audit period.	<p>This issue arose in the same manner as the issues identified in F3.2 and F4.1. That is, as part of BoardRoom's continuous improvement process a staff member implemented an efficiency modification in the mail room. Unfortunately, the change removed the evidentiary component that demonstrated the continued application of the control.</p> <p>The controls evidence has now been reinstated.</p>
F17.1	BoardRoom provides compliance reports via email or a secure portal to unlisted clients based on the client's requirements as stipulated in the Service Level Agreement.	For 5 out of 5 samples, the compliance reports were created outside the service level agreement with the client.	<p>As noted in response to F15.2, two (2) root causes have been identified for the delays in submitting compliance reports to clients identified. These are:</p> <ul style="list-style-type: none"> a) Staffing issues associated with absences through illness during the pandemic, as well as new and inexperienced staff; b) The above root cause led to there being Incomplete or delayed investigation of incidents that are to be included in the report. <p>Action plans have been developed to deal with both of these issues and will be implemented as from and including the July 2022 reporting.</p>
G3.3	Granting, altering and terminating user access requires a Mantis tickets to be logged, approved by management and processed by the IT Department.	For 1 out of 15 samples, the Mantis ticket for terminating access was not raised timely following the user's termination.	<p>There are three actions that will be taken to address this issue:</p> <ul style="list-style-type: none"> a) The Employee Termination Checklist Policy will be revised to include specific timings for completion of activities specified to be completed on termination of employment;

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- b) The use of the notification function within the FlareHR system is to be expanded. Once details of an employee's date of termination have been entered into the FlareHR system, the notification function generates emails to specified people. The list of staff who are to be notified by this function is to be expanded to include Risk and Compliance; thus allowing Risk and Compliance to also follow up to ensure a Mantis is logged; and
 - c) All managers will be reminded of the provisions of the Policy and Procedure for Altering SReg Access; this being the policy that contains, amongst other things, the requirement for a Mantis to be logged to remove SReg access for a terminating employee.
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BoardRoom

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