

Modern Slavery Act Statement

Introduction

This modern slavery statement is made by ACP Grosvenor Street Group Pty Ltd ACN 642 668 915 on its own behalf and on behalf of its subsidiaries ("GBST") and has been prepared with reference to the requirements in the Modern Slavery Act 2018 (AU) and the Modern Slavery Act 2015 (UK) (the "Acts") for the reporting period of 1 July 2024 to 30 June 2025 ("Reporting Period").

While GBST is not considered a "reporting entity" under the Acts because GBST does not meet the relevant financial thresholds set out in those Acts for the Reporting Period, GBST continues to be committed to addressing the risk of modern slavery¹ in GBST's business operations and supply chains so GBST has decided to publish its modern slavery statement on a voluntary basis. However, given GBST is not a "reporting entity", this modern slavery statement has not been submitted to or approved by any government body, or published on any government register.

The purpose of this voluntary statement is to outline GBST's approach to addressing the risk of modern slavery in GBST's operations and supply chain.

GBST Structure, Operations and Supply Chains

GBST provides global technology and digital solutions for financial services organisations. During the Reporting Period, GBST operated in Australia, the United Kingdom and Vietnam and had 340 staff, including contractors, as of 30 June 2025.

GBST's main operations relate to licensing its software products and services, and providing implementation services, customisation services, SaaS, support services and consultancy services to its clients. GBST's internal corporate functions include sales, marketing, human resources, IT, finance and legal.

GBST's supply chain is mostly focused on: (a) the procurement of technology for GBST clients (software, hosting and cloud services); (b) embedding or using such technology in conjunction with GBST's products and services; (c) using the procured technology to assist GBST in providing its products and services to GBST clients; (d) procuring software development services from offshore; and (e) procuring goods and services to support GBST's internal corporate functions and operational requirements, such as office supplies, office leasing, professional consultancy services such as legal firms, talent acquisition and recruitment agencies, payroll and finance systems.

Risk Identification, Management and Due Diligence

GBST's Executive Team has group-wide responsibilities and ultimately has common general oversight across GBST. Senior managers and team leads across the different functions of GBST are accountable for identifying, assessing and addressing modern slavery risk across GBST's operations since different types of suppliers in GBST's supply chain require assessment by different areas of GBST's operations.

As a software and services provider, GBST's suppliers are predominantly software suppliers, cloud infrastructure providers, banking services and professional consultants including finance, legal, and marketing firms, many of whom are considered

¹ In this statement, references to 'modern slavery' include trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

'reporting entities' under modern slavery legislation and so have their own processes in place to identify, assess and address modern slavery risk in their operations and supply chains.

GBST continued to assess the risk of modern slavery within its operations and key supply chains during the Reporting Period and as part of its standard risk management practices.

Based on GBST's operations and key supply chains, GBST has concluded that the likelihood of those operations and key supply chains to intersect with one or more of these modern slavery risk factors as low. Nonetheless, GBST continues to have measures in place to identify, assess, monitor and manage modern slavery risk.

Modern Slavery Policy

GBST has a Modern Slavery Policy, which reflects GBST's commitment to ensure that slavery and human trafficking do not take place anywhere within its operations or supply chains. The Modern Slavery Policy is used to ensure that staff are aware of their obligations in relation to modern slavery and how GBST seeks to address modern slavery in its operations and supply chain.

Modern Slavery Risk Tool

As part of GBST's risk management program, in 2025 GBST completed a Slavery and Trafficking Risk Template (STRT), housed by The Social Responsibility Alliance. The tool is a self-assessment questionnaire used to assess exposure of modern slavery related risks in the supply chain. This tool and self-assessment highlighted that GBST does not have operations in any sector that has a high risk of forced labour exploitation (as identified by the Global Estimates of Modern Slavery) and child labour exploitation (identified in Child Labour: Global Estimates 2020, Trends and the Road Forward ILO and Unicef 2021). It also highlighted that GBST does not source goods from high risk sectors (ie. from manufacturing or agriculture). This self-assessment will be completed at least annually, or sooner, if material changes occur to GBST's business operations and/or supply chain.

Supply Chain Review and Supplier Engagement

GBST has continued to review the potential risk of modern slavery practices across its supply chain taking into consideration factors such as location, industry and product/service.

In the Reporting Period, GBST identified those suppliers that GBST has categorised as a 'significant supplier' based on their total contract value or their criticality to the delivery of GBST's products and services. As such, our initial efforts to assess and address modern slavery risks are primarily concentrated on this group. GBST assessed the geographic locations of its significant suppliers. These suppliers are based in countries with generally lower modern slavery risk profiles, generally being Australia, the United Kingdom and the United States.

During the Reporting Period, GBST also continued to focus on ensuring that any supplier contracts that were introduced, renewed or amended: (a) included GBST's standard modern slavery clauses; or (b) the Supplier satisfied GBST's modern slavery due diligence processes; or (c) the Supplier satisfied GBST's modern slavery questionnaire (collectively, "GBST's Modern Slavery Supplier Standard").

If a supplier does not meet GBST's Modern Slavery Supplier Standard, GBST will a) not engage with this Supplier or b) may decide to work with the Supplier so they become compliant.

During the Reporting Period, GBST has continued to establish and develop collaborative relationships with its suppliers to build GBST's knowledge of the risk of modern slavery in its supply chain and determine the most effective way of managing and mitigating those risks as required. Building a collaborative relationship with the supplier will help build knowledge of potential supply chain risks and inform how best to manage and mitigate those risks.

GBST has also prepared a Supplier Code of Conduct setting out the minimum expectations for suppliers with respect to ethical practices, including addressing modern slavery risks, which will be published in FY26.

Whistleblowing Policy

GBST's Whistleblowing Policy allows and encourages employees and contractors to raise concerns regarding modern slavery and human trafficking in a confidential manner using procedures outlined in the Whistleblowing Policy. GBST is committed to creating and ensuring a non-discriminatory and respectful working environment for its employees. GBST wants all its employees to feel confident that they can expose wrongdoing without any risk to themselves. During the Reporting Period, GBST continued to engage Deloitte for an external, independent whistleblower service to provide an additional channel for employees, contractors and suppliers to raise concerns including in relation to modern slavery and human trafficking. GBST also reviewed its whistleblower procedures to ensure that the procedures remained appropriate for GBST's business and operations. During the Reporting Period, there were no reports made in relation to modern slavery concerns.

Training

GBST continues to deliver annual mandatory modern slavery training to its employees. GBST's Modern Slavery Policy and Whistleblowing Policy are made available to all employees on the GBST Intranet.

Recruitment

External recruitment

GBST uses reputable recruitment partners across the globe when sourcing employees and contractors and recruitment agreements either contain GBST's standard modern slavery clauses or a due diligence process has been undertaken to confirm that the recruitment partner meets GBST's Modern Slavery Supplier Standard.

Internal recruitment

During the Reporting Period, GBST appointed a dedicated Risk, Compliance, and Environmental, Social and Governance (ESG) Manager to strengthen oversight of operational and regulatory risks across the group. This role is responsible for supporting governance across these areas, including those related to human rights and modern slavery.

Assessment of the Effectiveness of Actions

GBST has been reporting on its actions in relation to combatting modern slavery since 2017. During the Reporting Period, GBST continued its implementation and use of modern slavery-related initiatives (discussed above), which responded to the modern slavery risks determined to exist within GBST's operations and its supply chains. GBST remains of the view that its direct operations have a low risk of modern slavery, and that risk primarily exists within GBST's supply chains. To assess the effectiveness of GBST's actions in respect of its supply chain, GBST considered the existing processes and tools available to staff and the nature of contract negotiations with suppliers that continued to indicate compliance with the process. GBST will continue the implementation, use and ongoing review of its modern slavery-related program in the next reporting period, identifying any potential refinements that could be adopted to ensure its effectiveness in preventing, identifying and addressing modern slavery risks across its global operations and supply chain.

Process of Consultation with Group Entities

GBST has a common governance framework across all Group entities and the same Executive Team has contributed to GBST's modern slavery-related program, including this statement. This Statement was approved by the Board of ACP Grosvenor Street Group Pty Ltd ACN 642 668 915 as the principal governing body of GBST on 21 October 2025.

Signed for and on behalf of the Board on 23 October 2025



Robert DeDominicis

Director and Chief Executive Officer

ACP Grosvenor Street Group Pty Ltd ACN 642 668 915