

CyberCX Policy

Modern Slavery Policy

1 Introduction

The CyberCX Group is committed to preventing Modern Slavery in all its forms, including forced labour, child labour, and human trafficking, within our operations and supply chains. This Policy is designed in accordance with the *Modern Slavery Act 2018* (Cth) (including other applicable Modern Slavery laws) and reflects our commitment to uphold human rights and ethical business practices.

As a cyber security company, we recognize the risks of Modern Slavery both within our operations and within the broader technology and services sectors. We are dedicated to ensuring that our business activities are free from any involvement in Modern Slavery and that we continue to work with our stakeholders to combat these risks effectively.

2 Application of the Policy

This Policy applies to all employees, contractors, officers, and directors of CyberCX. It also applies to our subsidiaries, affiliates, suppliers, and other third parties that provide goods or services to CyberCX.

The Policy is a critical element of our commitment to ethical business practices, and it applies to all levels of our business operations, including recruitment, employment practices, and dealings with suppliers and third parties.

3 Reporting Entities Covered by the Policy

The Modern Slavery Policy applies to the CyberCX Group (being CyberCX and its related bodies corporate) and all employees, contractors, and external service providers directly or indirectly involved in CyberCX's operations or business relationships.

Any reference in this Policy to CyberCX or CyberCX Group is a reference to the group members jointly and individually.

4 What is Modern Slavery?

The term '**Modern Slavery**', encompasses serious exploitation of individuals for personal or commercial gain, including practices like human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, child labour, and deceptive recruitment. It's an umbrella term for various forms of exploitation where individuals are forced to work or provide services against their will, often through coercion, threats, or deception.

5 Responsibility for the Policy

The ultimate responsibility for ensuring the implementation and enforcement of this Policy lies with the Board of CyberCX. Specifically, the General Counsel will oversee compliance with the Policy, in conjunction with our internal Modern Slavery Committee ('the Committee'), and lead efforts to monitor, assess, and address risks related to Modern Slavery.

Managers, department heads, and team leaders at all levels within CyberCX are responsible for ensuring that the Policy is adhered to within their respective areas. Employees at all levels are expected to comply with the principles outlined in this Policy and to take part in training and awareness programs to better understand Modern Slavery risks.

6 Compliance with the Policy

All employees, contractors, suppliers, and business partners are required to comply with the principles set forth in this Policy. Non-compliance may result in disciplinary action, including termination of employment, contracts, or business relationships, depending on the severity of the breach.

CyberCX will manage risk and compliance through:

- Annual training and awareness programs on Modern Slavery risks for employees and key stakeholders.
- Internal audits to identify potential areas of concern or non-compliance within CyberCX's operations and supply chains.
- Ongoing risk assessments, particularly in high-risk regions and sectors, to identify and address any Modern Slavery risks.
- Collaboration with suppliers and contractors to ensure they adhere to the same ethical standards and comply with this Policy.

7 Communication and Awareness of the Policy

To improve the effectiveness of this Policy, CyberCX will communicate it widely to all relevant stakeholders, including employees, contractors, suppliers, and business partners. This will be done through:

- Distribution of the Policy during onboarding processes for all new employees and contractors.
- Internal communications, including training sessions, to raise awareness of Modern Slavery risks and our commitment to eradicating such practices.
- Availability of the Policy on the CyberCX Group member's internal portal and, where applicable, on CyberCX Group member's external website, for easy access by all relevant stakeholders.
- Ensuring that suppliers and business partners are informed about the Policy and understand their obligations regarding Modern Slavery.

8 Breaches of the Policy

Any breach of this Policy is considered a serious matter and will be thoroughly investigated by the Committee, with support from the General Counsel. Breaches can include, but are not limited to:

- Direct or indirect involvement in Modern Slavery practices, such as forced labour, child labour, human trafficking or withholding worker identity or immigration documents.
- Utilising recruiters and agents who do not comply with local labour laws and/or charge prospective candidates recruitment fees as a condition of employment.
- Failure to report known or reasonably suspected cases of Modern Slavery within CyberCX or its direct supply chain.
- Non-compliance with internal processes for mitigating Modern Slavery risks, such as inadequate supplier due diligence or failure to conduct risk assessments.

If a breach is identified, CyberCX will take appropriate action, which may include:

- Investigating the incident and taking steps to mitigate the harm.
- Providing training or corrective action where the breach was the result of ignorance or lack of awareness.

- Terminating employment or business relationships in cases of severe or repeated non-compliance, where appropriate to do so.

CyberCX will also ensure that employees and stakeholders feel comfortable raising concerns without fear of retaliation, and any reports will be handled in a confidential and timely manner.

9 Reporting

Any suspected or actual instances of Modern Slavery should be reported to the CyberCX Legal Team at legal@cybercx.com.au.

Where a team member does not feel comfortable making a report to Legal, they may choose to report via the independent external Whistleblowing report service engaged by CyberCX – Your Call.

24/7 online: www.yourcall.com.au/report

Organisation ID: CYBERCX

AUS 1300 790 228

NZ 0800 123 508

UK 0-800-046-5662

US (or International) +61 3 9938 7027

10 Review

This Policy will be reviewed annually by the Committee, with final approval from the General Counsel. The review process will assess the effectiveness of the Policy, identify areas for improvement, and ensure that it remains aligned with legal requirements, industry standards, and CyberCX's values.

During the review, CyberCX will:

- Evaluate the effectiveness of training programs and internal controls.
- Assess feedback from employees, suppliers, and business partners.
- Update the Policy as necessary to address emerging risks, regulatory changes, and best practices in the fight against Modern Slavery.

The Policy will be updated as required to ensure that it remains current, effective, and in line with evolving legal frameworks and industry expectations.

11 Conclusion

CyberCX is committed to ensuring that Modern Slavery is not present in any part of our business operations or supply chain. We will continue to take all necessary steps to mitigate risks, comply with the Modern Slavery Act 2018 (Cth), and maintain the highest standards of ethical conduct. We expect all employees, contractors, and suppliers to share our commitment to eradicating Modern Slavery in all its forms.

12 Document History Details

Table 1 – Document History

| Version number | Effective Date | Owner | Reviewed by (date) | Approved by (date) | Review Date |
|----------------|----------------|-----------------|-----------------------------|--------------------|-------------|
| 1 | 7 July 2025 | General Counsel | General Counsel (July 2025) | July 2025 | 1 July 2026 |

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