



Cyber Security + Customer Experience

MODERN SLAVERY STATEMENT

1 July 2024 – 30 June 2025

1. ABOUT THIS STATEMENT

CyberCX is pleased to present its 2025 Modern Slavery Statement (**Statement**) covering the period 1 July 2024 to 30 June 2025 (**Reporting Period**) in accordance with the *Modern Slavery Act 2018 (Cth)* (the **Act**).

This is our sixth Modern Slavery Statement. Headquartered in Melbourne, Australia, the CyberCX group consists of over 20 wholly owned, related bodies corporate across Australia, New Zealand, the United Kingdom and the United States.

The Modern Slavery Act defines 'Modern Slavery' as eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services. Additionally, the *United Nations Guiding Principles on Business and Human Rights*¹ provide guidance for companies to prevent, address and remedy human rights abuses committed in business operations, which is consistent with the Modern Slavery Act.

As a people-focused business with the purpose to 'protect the communities in which we live', we take seriously the importance of human and workplace rights, the principles set out in the United Nations' Universal Declaration of Human Rights², and the United Nations' Guiding Principles on Business and Human Rights³.

CyberCX leverages these frameworks in undertaking its Modern Slavery assessments and disclosure, consistent with best practice.

CyberCX is committed to continuous improvement and taking proactive steps to ensure that Modern Slavery does not occur in our own business and supply chains, as now overseen by our Modern Slavery Working Group, our Risk Committee and ultimately our Board.

¹ Available at www.business-humanrights.org/en/big-issues/un-guiding-principles-on-business-human-rights/

² United Nations, 1948. Universal Declaration of Human Rights available at www.un.org/en/about-us/universal-declaration-of-human-rights

³ United Nations UN Guiding Principles on Business and Human Rights available at www.business-humanrights.org/en/big-issues/un-guiding-principles-on-business-human-rights/

2. OUR REPORTING ENTITIES

In accordance with the Act, the **Reporting Entity** for this Statement is CyberCX Pty Ltd ACN (629 363 328). The Reporting Entity is the main trading and operating entity of the CyberCX group of Australian companies.

3. CYBERCX'S BUSINESS, STRUCTURE, OPERATIONS AND SUPPLY CHAINS

3.1 Our business

CyberCX has not changed its business structure materially from previous statements. CyberCX is Australia and New Zealand's largest, leading independent cyber security services organisation, unifying the largest number of cyber security and cloud security experts to provide the most comprehensive range of cyber security services to our customers.

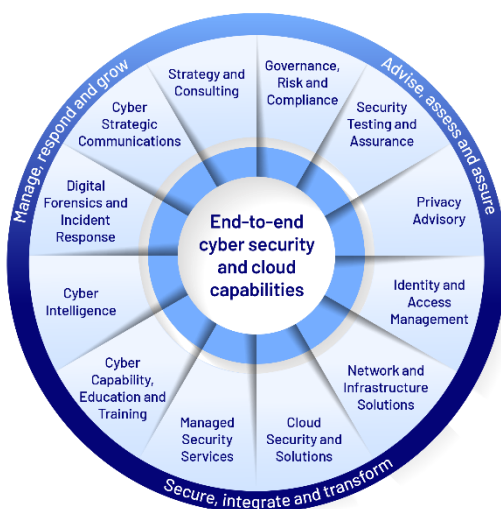
Our Vision is to be *'The greatest force of cyber security experts in Australia and New Zealand - with global ambitions'* and our Purpose is to *'Secure our communities'* by providing the most comprehensive range of end to end cyber security services to our clients.

Headquartered in Melbourne, Australia, the vast majority of our 1300+ team are located in Australia and New Zealand; we also provide services to customers in the United Kingdom, European Union and the United States through small teams on the ground in those locations.



We partner with enterprise and public sector organisations to support their cyber risk management and reduction practices in an increasingly complex and challenging threat environment. We strive to make the online environment safe and to secure and support the communities in which we live. This purpose is described on our website and embedded in our Code of Conduct. Consistent with this purpose, we are committed to preventing slavery and human trafficking in our operations and supply chains.

3.2 Operations



CyberCX is principally involved in the delivery of critical, complex cyber security consulting services to government and business customers. While we partner with and resell leading technology (SaaS and hardware) providers to support our customers' needs, our DNA is grounded in people-orientated consultancy services to advise our clients on industry best practices and support their pathway to being cyber secure.

Our facilities comprise corporate offices across Australia, New Zealand, and the United Kingdom, including three serviced offices managed by third-party providers, where our teams work and collaborate.

3.3 Key supply chains areas





Our supply chain has remained consistent with previous Statements, and our key areas of expenditure relate to goods and services that provide the infrastructure, facilities and other support required to enable the delivery of our services in the following key categories: Technology & hardware; Premises & facilities; Professional services; Staff items; and Travel & expenses.

4. RISKS: FY2025 ASSESSMENT OF OUR MODERN SLAVERY RISKS

Consistent with previous Statements, in the Reporting Period our legal, finance and vendor sourcing teams have continued to map our evolving supply chain to assess potential Modern Slavery risks.

In the Reporting Period, CyberCX had over 600 suppliers in our operational supply chain. Less than 135 suppliers received an annual expenditure from CyberCX of more than AUD\$100,000, and of those, 70 were for internal consumption (the majority provided soft-services such as insurance, accounting, telecommunications/utilities, cleaning, marketing and software).

Excluding remuneration, our major categories of procurement are:

AREA	EXPOSURE TO MODERN SLAVERY RISKS	
	<p>Technology and hardware <i>Data storage, hardware and software supply, including resale to customers</i></p>	<p>Electronics is recognised as a high-risk industry globally. We procure from leading Tier 1 globally recognised suppliers who have mature measures to reduce Modern Slavery risks in their supply chains, including independent auditing and public reporting of key measures and KPIs.</p>
	<p>Premises and Facilities <i>Rental, cleaning, energy and related</i></p>	<p>Cleaning services are recognised as high-risk services globally. CyberCX uses the cleaning services provided by the building management (usually large, superannuation-backed infrastructure managers with mature reporting arrangements) at each of our office sites.</p>
	<p>Professional Services <i>Insurance, audit, legal, accounting and taxation services</i></p>	<p>While professional services can pose modern slavery risks, given that CyberCX sources these services predominantly from Australia and New Zealand, these are not considered high risk.</p>
	<p>Staff items <i>Staff apparel and merchandise</i> <i>Coffee and other office consumables</i></p>	<p>The textiles industry is considered high-risk globally. We procure staff apparel and merchandise from local suppliers. We acknowledge production of a portion of our merchandise is likely to be undertaken in China, a country which may present a higher risk of Modern Slavery practices.</p> <p>While our coffee is sourced from trusted local partners and distributors, the coffee supply chain to</p>

the farm, may present a higher risk of Modern Slavery practices.



Travel and expenses

Not considered high risk services given that nearly all travel occurs within Australia, and international travel will be with major airlines and at reputable and well regarded hotels.

To better understand our risk profile in these areas, the Committee (see further information at paragraph 5.1) has mapped our suppliers in aggregate to a risk matrix, by considering industry/service type and geographical location as the key risk factors for assessing Modern Slavery risk.

This allows us to better focus on higher-risk supplier-types as part of our efforts:

		Likelihood assessed by industry			
		Unlikely <i>It is unlikely there will be a risk of modern slavery in these industries.</i>	Possible <i>It is possible there is a risk of modern slavery in these industries.</i>	Likely <i>There is likely to be a risk of modern slavery in these industries.</i>	Highly likely <i>There is a high likelihood of modern slavery in these industries.</i>
Likelihood assessed by country	Low Australia Scandinavia United States Austria	Belgium United Kingdom Singapore Japan	X - Professional Services/consultants	X - IT Software and Hardware Distributors	X - SaaS providers X - Unskilled labour
	Minor Croatia Albania Japan Argentina Brazil				
	Moderate Mexico Peru Ecuador Turkey Colombia Guyana	Hong Kong Honduras Vietnam			X - Outsourced coding
	Major Venezuela Sudan DRC Chad Somalia Colombia	Taiwan Indonesia Belarus Macedonia Turkmenistan Russia			X - IT Hardware and Software
	High Philippines Cambodia The Central African Republic PNG North Korea	Malaysia Thailand India Pakistan China Bangladesh			X - Apparel and merchandise manufacturers

Note: based from the Global Slavery Index 2023

This Risk Matrix provides a general overview of our risk positions with respect to Modern Slavery, enabling a more targeted approach in our mitigation actions across future reporting periods.

5. ACTIONS: FY2025 ACTIONS TO MITIGATE OUR MODERN SLAVERY RISKS

5.1 Governance and management

CyberCX has a mature corporate governance policy framework to deal with the identification and management of risk across the business; specifically concerning Modern Slavery:

Modern Slavery Policy – during this Reporting Period CyberCX has uplifted and finalised a new Modern Slavery Policy for its business. This policy aims to assist CyberCX in identifying and/or preventing exploitation, ensuring legal compliance, and upholding ethical standards across operations and supply chains. By promoting transparency and due diligence, the policy helps mitigate reputational and legal risks while reinforcing our values-driven culture. It aligns the organisation with legislation like the Modern Slavery Act 2018 (Cth) and global human rights principles.

Internal Modern Slavery Training – during this Reporting Period CyberCX has undertaken a significant uplift of its internal training for its staff members in respect to Modern Slavery. The improved training series covers what modern slavery is, the experience of modern slavery for impacted individuals, where it may arise within CyberCX, what our team can do if modern slavery is identified, and requires commitment to our improved Modern Slavery Policy. This training will be undertaken annually by all CyberCX team members as part of our mandatory training package.

Contractual Obligations – CyberCX continues to work towards incorporating standard contractual obligations concerning modern slavery prevention and risk management in all our supplier agreements. These contractual terms set out the minimum standards that CyberCX expects from our suppliers regarding identifying, assessing, and managing modern slavery within their supply chain. During this Reporting Period we increased our focus in this area, creating and finalizing a new Modern Slavery Schedule that we work to incorporate into supplier contracts moving forward.

These statements are supported by our **Whistleblower Policy** (which encourages notification of illegal or unethical conduct or wrongdoing, such as Modern Slavery via our anonymous whistleblower service) and our **Environment Social and Governance (ESG) Policy** (which outlines a core principle of promoting the elimination of all forms of forced and compulsory labour, the effective abolition of child labour, and the elimination of discrimination in respect of employment and occupation).

In the Reporting Period we have taken the following steps to improve our Modern Slavery governance and management practices:

- Created and implemented a new Modern Slavery training package for all team members which will form part of annual mandatory training for our team members.
- Uplifted and rolled out a new Modern Slavery policy for CyberCX to solidify our positions and clearly articulate the expectations and processes of our staff in the event Modern Slavery is identified within our supply chain.
- Continued to advance our governance controls by continuing our standing governance working group to administer and guide our overall Modern Slavery risk management approach (**Committee**). The Committee reports to the Group General Counsel and is made up of cross-functional representatives who have responsibility for supply chain management in their functional areas (eg, IT; operations, administration and property; human resources).
- Continued our ongoing review and stress testing of our employment wages and conditions which did not identify any issues in the Reporting Period.

5.2 Overview: CyberCX's annual supplier diligence and risk assessment

CyberCX's supply chain continues to be dominated by large, global IT hardware and services providers.

To assess CyberCX's modern slavery risks across our supply chain, we adopted a multifaceted diligence approach comprising:

- (1) our annual survey of all suppliers with a spend exceeding AUD\$100,000pa (**Annual Survey**);
- (2) a desktop review of selected key suppliers; and
- (3) a targeted questionnaire and assessment of merchandising suppliers.

This layered approach enabled us to capture a more complete picture of supplier maturity and risk management, even where direct responses were not available.

As a result of this combined approach, our diligence coverage increased from 25% in 2024 to 46% in 2025. Between the Annual Survey and desktop review our review covered suppliers representing over 70% of CyberCX's annual spend in these categories.

Drawing on data from both our supplier questionnaire and desktop audit, we made the following observations:

- 0 instances of actual or suspected Modern Slavery.
- 97% of organisations who are reporting entities have published a Modern Slavery Statement. All of our reporting entity suppliers have previously issued modern slavery statements, however, one of our providers has not issued its 2024 Modern Slavery Statement reducing our compliance rate from 100% in our last Modern Slavery Report.
- 76% of organisations have processes in place to manage Modern Slavery risks in their global supply chains.

These findings highlight both progress and ongoing challenges. Suppliers are increasingly recognising the importance of addressing modern slavery risks and are demonstrating a stronger commitment to responsible supply chain management. Many have taken proactive steps to uplift their internal frameworks, and encouragingly, most have implemented some form of risk management processes, reflecting a growing maturity in how modern slavery and broader human rights obligations are being integrated into their operations. However, a notable proportion still lack formal procedures, underscoring the need for continued engagement and capacity-building in this area.

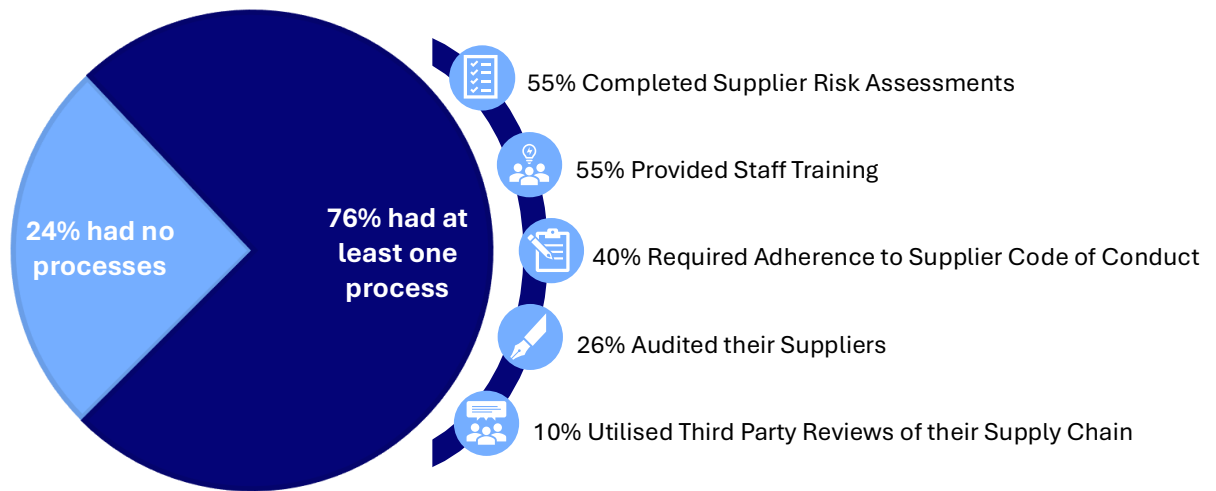
5.2.1 Annual Supplier Questionnaire

During the Reporting Period, CyberCX conducted its Annual Survey to assess Modern Slavery risks, identify any actual or suspected instances of Modern Slavery, and evaluate supplier alignment with our Modern Slavery Policy and Supplier Code of Conduct.

For the Reporting Period we received a 32% response rate to our Annual Survey (a small increase from 25% in previous reporting period), which accounted for approximately 14% of our annual supplier spend. Of those who responded, 31% are considered 'reporting entities' under the Act (or similar legislation in other jurisdictions).

The key findings from suppliers who responded to our Annual Survey are as follows:

Processes to Manage Modern Slavery Supply Chain Risks



Contractual Provisions to Manage and Mitigate Modern Slavery Supply Chain Risks



5.2.2 Desktop Review

Given the size and global reach of some of our largest vendors, we recognise that our ability to directly influence their supply chain practices is limited. Using publicly available materials, we undertook a desktop review of our largest suppliers who collectively accounted for 57% of our annual supplier spend. Our desktop review assessed these suppliers for their continuing efforts to identify, manage and reduce modern slavery risks. From the information available, no remediation actions were identified.

Of the suppliers reviewed:

- 73% were reporting entities under the Modern Slavery Act or equivalent legislation.
- 63% publicly disclosed that they provide training to staff on modern slavery risks.
- 79% had identifiable processes in place to mitigate modern slavery risks in their supply chains.
- 47% of suppliers were identified as having policies that either directly addressed modern slavery or referenced modern slavery obligations within broader human rights or ESG

frameworks. This figure is likely understated, as the desktop review relied solely on publicly available information and did not provide access to internal policies or documentation.

These findings suggest that many of our largest suppliers are actively engaging with modern slavery risk management, though the level of transparency and specificity in public disclosures varies.

5.2.3 Targeted assessment of merchandise suppliers

Through the ongoing supplier assessment and the creation of our Risk Matrix we have identified our merchandise suppliers as a potential risk of modern slavery. Our merchandise suppliers provide us with items for internal and promotional consumption, such as:

- T-shirts, polos, and hoodies
- Caps, scarves, umbrellas, socks, face masks
- Backpacks, sports bags, and tote bags; and
- Lanyards, stickers, notepads, and keep cups

To address this in the Reporting Period, we created and distributed a survey specific to our merchandise suppliers. The survey covered the topics addressed in the Annual Survey, with additional targeted questions regarding their employment and workplace practices, as well as the standards imposed on their third-party suppliers and manufactures (both offshore and within Australia).

We achieved a 45% response rate from this section of our supply chain. Encouragingly, the companies who did respond represent 94% of our annual spend in this sector. This gives us confidence in the scope of the audit and importance of the responses.

From these responses, we have made the following observations:

- 0 instances of actual or suspected Modern Slavery
- All suppliers complied with applicable labour and workplace health and safety laws
- All suppliers require a third-party accredited auditor to verify the practices of their third-party manufactures, these included addressing standards outline in Sedex Members Ethical Trade Audit and Business Social Compliance Initiative
- All suppliers agreed to adhere to our Supplier Code of Conduct; and
- Despite none of the suppliers being categorised as reporting entities, 60% of them had either a policy of voluntary statement in place.

We are pleased with the improved level of oversight over this part of our supply chain that we have established in the Reporting Period; however, we acknowledge there is still room for improvement and will continue to monitor this aspect of our supply chain closely.

5.3 Customer onboarding

It continues to be standard practice for our customers to require CyberCX to contractually agree to certain Modern Slavery commitments as part of their services arrangements or request for tender processes. CyberCX readily agrees to comply with applicable Modern Slavery legislation in all jurisdictions we operate in, as well as reasonable provisions that assist our customers to comply with their obligations under the same.

5.4 Supplier onboarding

We have continued to use reasonable efforts to insert our standard contractual positions to give us insight and rights concerning Modern Slavery risks in our suppliers. In the Reporting Period, we undertook a review and uplift of these terms, creating a more robust contractual framework for our suppliers to ensure appropriate oversight into our supply chain.

6. EFFECTIVENESS: ASSESSMENT OF THE EFFECTIVENESS OF OUR FY2025 ACTIONS

CyberCX continues to strengthen its approach to identifying and mitigating modern slavery risks across its supply chain. During the Reporting Period, we implemented a multifaceted diligence strategy comprising our Annual Survey, a desktop review of key suppliers, and a targeted assessment of merchandise suppliers. We believe the actions taken in this Reporting Period have helped us make further progress to embed and improve our response and strategies toward mitigating and, where possible, eliminating Modern Slavery risks in our supply chain. This approach enabled us to assess supplier maturity and risk management practices, even where direct engagement was limited.

Key outcomes:

- Despite a minor decrease in the number of suppliers who were identified as a top supplier (with an annual spend over \$100k), our audit results accounted for over 70% of our annual spend and our overall response rate has increased from 25% to 32%, rising to 46% when desktop audit results are included.
- Our targeted assessment of our merchandising suppliers represented 94% of our annual spend in that category.

Despite traditionally low response rates from our international suppliers, we gained valuable insights from those who did engage and are confident in the proportionate scale they represent in terms of our annual spend. Notable findings include:

- (1) 28% of our medium sized vendors do not include any contractual provisions with their suppliers to enforce modern slavery protections, such as reporting obligations, audit rights, or termination clauses.
- (2) Seven (7) of our vendors refused to comply (or only partially agreed to comply) with our Supplier Code of Conduct which has prompted further conversations with those suppliers.
- (3) A proportion of our vendors (16%) did not have any processes in place to manage their modern slavery risks or to audit their supply chains. Of these, some advised they were in the process of uplifting their internal processes, while others did not believe their businesses had a need for one in relation to the goods they supply to us, either due to the nature of the services they are supplying CyberCX (eg, professional services, office spaces), their business' size and nature of operations or lack of suppliers required for the provision of their services to CyberCX.
- (4) A sizeable minority of our vendors were yet to conduct any training or internal awareness raising about Modern Slavery (28%). Of these, most were smaller businesses with minimal capacity for such (and in most cases, not bound by any Modern Slavery reporting legislation). All of our suppliers who are modern slavery reporting entities had training in place for their staff.
- (5) A subset of our suppliers (33%) indicated that they require their direct suppliers to certify that materials used in their products are sourced and manufactured in compliance with modern slavery laws. While not yet widespread, this practice represents a proactive step toward extending accountability deeper into the supply chain.
- (6) None of our suppliers were aware of any actual or suspected instances of Modern Slavery in their supply chains, nor had been subject to any legal claims related to Modern Slavery or breaches of any industrial relations laws in their jurisdiction. In Q3/Q4 of FY2026 we intend to make further inquiries here due to the mismatch between some supplier's lack of Modern Slavery awareness and their capacity to make this representation.

The results of this latest round of due diligence will be further analysed by our Committee and recommendations made as to any education, training or remediation support we can offer to these vendors while factoring in those vendor's size and capacity. The insights gained will inform ongoing improvements to our policies, supplier communications, and risk assessment tools, supporting our commitment to continuous enhancement of our ethical sourcing practices.

While CyberCX has not identified any material issues or instances of substantial non-compliance, CyberCX will remain vigilant over the coming year. To the extent that any compliance concerns arise, CyberCX will seek to work with them to improve their attitudes to Modern Slavery identification and mitigation, and otherwise, we may reconsider our relationships with such vendors.

In our last report we noted we were working towards improved systems for due diligence and monitoring, and while we have made progress in the Reporting Period, including through the inclusion of a desktop review of large multinational suppliers, we feel we have further improvements to be made in this area. This will be a goal of the Committee's work across future reporting periods.

7. NEXT STEPS AND COMMITMENTS

Our focus areas for FY2025-2026

Based on the work undertaken to date to understand, manage, and mitigate risks in our supply chain, our FY2026 focus areas for continuous improvement are:

- Continuing the activities of our Committee to broaden and deepen our approach to Modern Slavery across the business and reporting up to and including the Board.
- Undertaking an annual review of our Modern Slavery Risk Matrix as part of embedding Modern Slavery risks into our broader CyberCX Risk Management framework.
- Conducting a targeted 'deep dive' into our IT hardware suppliers, building on previous reviews of cleaning and corporate merchandise suppliers, to assess upstream risks and supplier practices.
- Continuing to identify high-risk suppliers where CyberCX can influence Modern Slavery outcomes, and initiating further deep dives where appropriate.
- Progressing the implementation of Modern Slavery contractual requirements across our supplier base, where feasible.
- Responding appropriately to observations and feedback received from customers regarding Modern Slavery risks.

8. OUR CONSULTATION APPROACH

All various wholly owned subsidiaries in the CyberCX group are integrally connected to CyberCX, with shared management, governance, risk and other corporate functions. Given this, we have conducted an internal consultation process across key stakeholders of our executive leadership team, finance and relevant supply chain managers to execute activities and write this Statement.

9. APPROVAL

In accordance with Section 13(2) of the Modern Slavery Act, this Statement was approved by the Board of CyberCX Holdings Pty Ltd on 27 November 2025.

The Board is the principal governing body of CyberCX for the purposes of approving this Statement. This Board has authorised John Paitaridis, Chief Executive Officer, to sign this Statement.

Signed

Date

John Paitaridis
Chief Executive Officer
CyberCX

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