

MODERN SLAVERY STATEMENT FY2025

Introduction

Australia's Modern Slavery Act 2018 (Cth) defines 'modern slavery' as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. Similarly, the UK's Modern Slavery Act 2015 addresses four core offences falling under the umbrella of modern slavery: slavery; servitude; forced or compulsory labour; and human trafficking.

The Simpro Group Pty Ltd and its related bodies corporate, including AroFlo Innovations Pty Ltd, ClockShark LLC and BigChange Limited (together, Simpro Group), are committed to sourcing products and services in a transparent, ethical and responsible manner. Simpro Group has a zero-tolerance approach to modern slavery. It is committed to acting with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to assess and manage modern slavery risks.

This is Simpro Group's fourth modern slavery statement. This statement describes the steps Simpro Group has taken to assess modern slavery risks within its operations, inclusive of its supply chain, during the period 1 January 2025 to 31 December 2025, and details the actions being taken to help address these risks. These steps are helping Simpro Group continue to develop a more informed and systematic approach to identifying, assessing and addressing modern slavery risks in its operations and supply chain.

Simpro Group's structure, operations and supply chain

Our structure and operations

Simpro Group's operations are divided into four main divisions, each providing field service management Software as a Service solutions tailored for trade and service-based businesses:

- Simpro: described here <https://www.simprogroup.com/> (Simpro)
- AroFlo: described here <https://aroflo.com/> (AroFlo)
- ClockShark: described here <https://www.clockshark.com/> (ClockShark)
- BigChange: described here <https://www.bigchange.com/> (BigChange)

Simpro is headquartered in Brisbane, Australia and Simpro Software Pty Ltd (ACN 121 998 945), a wholly-owned subsidiary of The Simpro Group Pty Ltd, is its Australian operating entity, with its registered office at Building 17 Garden City Office Park 2404 Logan Road Eight Mile Plains QLD 4113 Australia. Simpro carries on business in Australia, New Zealand, North America, Europe and Asia through various wholly-owned subsidiaries of The Simpro Group Pty Ltd, including Simpro Software Ltd (Company Number 06983493) in the UK.

AroFlo is headquartered in Melbourne, Australia and AroFlo Innovations Pty Ltd (ACN 638 665 362), an entity with the same ultimate parent company as The Simpro Group Pty Ltd, is its operating entity. During the reporting period, AroFlo moved from its Ringwood office to Box Hill, Victoria. AroFlo carries on business in New Zealand under this same operating entity.

ClockShark, LLC, a wholly-owned subsidiary of The Simpro Group Pty Ltd, is its operating entity. During the reporting period, Simpro Group closed the ClockShark office in Chico, California. Following the end of the reporting period, ClockShark began operating from Simpro's Miami office. ClockShark continues to carry on business in North America and Europe under the same operating entity.



BigChange is headquartered in Leeds, UK and BigChange Limited, a wholly-owned subsidiary of The Simpro Group Pty Ltd, is its operating entity, with its registered office at 3175 Century Way Thorpe Park Leeds LS15, UK. BigChange Limited carries on business in Europe, North America, Australia and New Zealand under this same operating entity.

Simpro, AroFlo, ClockShark and BigChange all operate in the same industry sector.

During the reporting period, Simpro Group’s business activities and supply chain remained broadly consistent with the prior reporting period. AroFlo relocated its Melbourne office from Ringwood to Box Hill in October 2025, and Simpro Group closed the ClockShark office in Chico, California. These office changes did not materially alter Simpro Group’s modern slavery risk profile. Simpro Group continued to apply its existing modern slavery risk management framework across its operations and supply chain.

Following the end of the reporting period, Simpro expanded its office footprint to include offices in Florida, New Jersey and Quebec, and ClockShark began operating from Simpro’s Miami office. These post-reporting-period changes have not materially altered the nature of Simpro Group’s operations or workforce profile.

Our supply chain

As a technology business, Simpro Group’s key spend categories are:

Categories	Description
Third party professional services	Professional services providing services such as software engineers, accounting, financial and legal services.
IT software solutions	IT software, cloud platform services and computer systems.
IT hardware and maintenance	IT hardware used by our employees. IT hardware resold to our customers.
Marketing	Advertising and marketing services and products.
Facilities	Office operations such as leasing, cleaning, security and repairs and maintenance, and office consumables across Simpro Group’s offices.

The geographic footprint of our direct suppliers includes (but is not limited to) Australia, New Zealand, North America, Europe and East Asia. We appreciate that these suppliers also have their own, often global, supply chains that form part of our broader supply chain.

As Simpro Group’s office footprint evolves, including through relocations, closures and new office arrangements, facilities-related suppliers such as landlords, cleaning, security, repairs and maintenance, and office consumables continue to be considered as part of Simpro Group’s supplier risk assessment processes.

Modern slavery risks in Simpro Group’s operations and supply chain

Recognising the prevalence of modern slavery and the global nature of logistics and supply chains, Simpro Group acknowledges that modern slavery practices may be present in its operations and supply chains.

Risks in our operations

The risk that our operations have caused, contributed or been linked to modern slavery is low.

This is because:

- The domestic operations of participants in the technology industry are considered to be a lower risk industry for modern slavery.
- Simpro, AroFlo, ClockShark and BigChange comply with employment laws, which regulate the recruitment and remuneration for our direct workforce.
- Simpro, AroFlo, ClockShark and BigChange have People and Legal specialists who support us with employment law compliance.
- Employees are free to join any union or association.
- As a technology company, most of our workforce are tertiary educated professionals.

Office relocations, closures and additions during or following the reporting period did not materially alter the nature of Simpro Group's operations or workforce profile. Accordingly, Simpro Group continues to assess the risk that its operations have caused, contributed to or are directly linked to modern slavery as low.

Risks in our supply chain

In assessing our supply chain, we considered sector and industry risks, product and services risks, and geographic risks.

The following procurement categories relevant to our business may carry an inherently higher risk of modern slavery:

- IT and telecommunications (hardware and software)
- Marketing and events (including merchandise and catering)
- Facilities (including cleaning, security and repairs and maintenance, and office consumables)
- Other office expenses (courier services and business travel)

The relocation, closure or addition of office locations may involve facilities-related suppliers, including landlords, cleaning, security, repairs and maintenance, and office consumables. These categories are already included in Simpro Group's supplier risk assessment processes and do not materially change the overall supply chain risk profile identified during the reporting period.

The increased risk profile of these categories can be due to a combination of factors such as:

- The prevalence of subcontracting arrangements leading to decreased supply chain transparency
- Labour intensive work coupled with low barriers to entry
- Workers from vulnerable backgrounds including migrant workers
- Operations in countries with higher risks for modern slavery

From our modern slavery assessment, we ascertained that during the Reporting Period our major suppliers are technology companies domiciled in Australia, the United States or Europe. The technology industry in Australia, the United States and Europe (within which our largest suppliers by spend operate) have lower risks of modern slavery in their direct operations. However, their supply chains, like most businesses, carry a higher risk by virtue of raw material extraction, component manufacturing, assembly and logistics. Workers in these supply chains are often low-skill or migrant workers working in countries with a higher prevalence of modern slavery, making them more vulnerable to modern slavery practices.

The risk that our business has caused or contributed to modern slavery in our supply chain is low. However, like most, if not all similar entities operating in our sector, there is inherent risk that our business is linked to modern slavery via our suppliers and their respective supply chains.

Actions taken during Reporting Period

Employees

Compliance

During the reporting period, the People and Legal teams continued to support compliance with local labour, health, safety and employment laws as well as applicable collective agreements and Industrial Awards.

Working rights and legal working age

During the recruitment process, the People team continued to confirm working rights and that those recruited were of legal working age.

Policies and procedures

Simpro Group continued to implement policies designed to support compliance with local labour, health, safety and employment laws as well as collective agreements and Industrial Awards. The policies outline the standard of behaviour we expect of our employees, working conditions they are entitled to, and how to report any issues or concerns. Key policies and procedures include:

- Code of Conduct
- Discrimination, EEO, Bullying and Harassment Policy
- Whistleblower Policy
- Workplace Health and Safety
- Modern Slavery

Employees can access electronic versions of these policies. The policies are also made available to new employees.

Remediation process

Simpro Group's Whistleblower Policy continued to set out the processes and protections for employees to raise concerns, including anonymously, about alleged misconduct, including improper conduct relating to modern slavery.

Simpro Group remains committed to providing for, or cooperating in, remediation in the event that its business is found to have caused or contributed to modern slavery impacts.

Modern Slavery Questionnaire and Supplier Code of Conduct

During the reporting period, Simpro Group continued to issue modern slavery questionnaires to selected suppliers, with priority given to suppliers operating in countries or sectors with a higher prevalence of modern slavery. These questionnaires request information on suppliers' approaches to assessing and addressing modern slavery risks.

Simpro Group also continued to make its Supplier Code of Conduct available to suppliers. The Code sets out Simpro Group's minimum expectations and requirements in areas such as modern slavery, human rights, labour, environment, health and safety, and anti-bribery and corruption for suppliers providing goods and services to

Simpro Group. The Code is published at <https://www.simprogroup.com/legal>. Simpro Group reviews and updates the Code periodically to ensure it aligns with the business' priorities and stakeholders' expectations.

Modern Slavery Policy

Simpro Group continued to maintain a Modern Slavery Policy, which employees are required to review. This policy explains what modern slavery is and the pathways for employees to raise and manage identified or potential modern slavery issues affecting Simpro Group or its suppliers.

Learning

During the reporting period, Simpro Group continued to make modern slavery training available to employees who have involvement with procurement processes. Simpro Group also continued to consider whether training should be made available to broader segments of employees involved in supplier engagement or management.

Standard contractual terms

During the reporting period, Simpro Group continued to incorporate modern slavery clauses into new supplier contracts and renewed supplier contracts, where appropriate. These clauses include requirements for suppliers to comply with Simpro Group's Supplier Code of Conduct and to notify Simpro Group of any identified instances of modern slavery in their operations or supply chains.

Actions relating to the integration of BigChange

During the FY2025 reporting period, Simpro Group continued the integration of BigChange into its modern slavery compliance framework. This included continuing supplier due diligence activities, making Simpro Group's Supplier Code of Conduct available to relevant BigChange suppliers, and incorporating modern slavery clauses into applicable new or renewed supplier contracts.

BigChange employees involved in procurement, supplier engagement and relevant operational areas continued to be informed of Simpro Group's modern slavery compliance requirements, including the requirement to carry out due diligence on suppliers in sectors and countries where the risk of modern slavery is elevated.

Simpro Group expects to continue embedding its modern slavery risk management processes across BigChange as part of its broader group compliance framework.

Assessing the effectiveness of our actions

Simpro Group acknowledges that industry risk is only one factor in assessing overall supplier risk. As Simpro Group continues to enhance its procurement, due diligence and governance processes, it expects to continue expanding and improving its supply chain assessment processes over time. Simpro Group's continuous improvement approach is intended to support measures that are responsive to identified risks.

We have set out below the key performance indicators (KPIs) we use to measure the quantitative impacts of our actions:

- Targeted suppliers issued a modern slavery questionnaire as part of our supplier due diligence process
- Targeted suppliers that agreed to our Code
- Completion rate for targeted employees completing modern slavery training
- The proportion or number of complaints resolved by a grievance mechanism in relation to modern slavery risks

Simpro Group continued to assess the effectiveness of its actions by reference to supplier due diligence activity, supplier engagement with the Supplier Code of Conduct, employee training completion and any complaints raised through available grievance mechanisms. Simpro Group continues to develop its approach to tracking these measures consistently across the group.

Simpro Group has identified the following focus areas for the next reporting period:

- Continue embedding modern slavery policies and procedures across BigChange and the broader Simpro Group
- Continue expanding supplier due diligence based on risk, supplier category and spend
- Improve tracking of supplier responses to modern slavery questionnaires and the Supplier Code of Conduct
- Review modern slavery training coverage for employees involved in procurement, supplier engagement and supplier management
- Continue incorporating modern slavery clauses into new and renewed supplier contracts, where appropriate
- Further assess and adjust KPIs to monitor, measure and improve the effectiveness of Simpro Group's actions

Process of consultation

The process of consultation in preparing this Statement, as between the reporting entities, involved consultation with Senior Management of each relevant entity and consideration of other Simpro Group entities which are controlled by or related to the reporting entities. The content of this Statement was tabled for review with the Chief Operating Officer and relevant senior stakeholders.

Approval

This joint statement is made by The Simpro Group Pty Ltd on behalf of Simpro Software Pty Ltd, AroFlo Innovations Pty Ltd, ClockShark LLC and BigChange Limited. It was approved by the Board of The Simpro Group Pty Ltd in May 2026.



Ashley Mehlman
Director of The Simpro Group Pty Ltd

Annexure - Reporting criteria

Reporting Criteria	Pages
1 & 2. Identify the reporting entity and describe its structure, operations and supply chains	1-2
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	2-4
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	4-5
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	5-6
6. Describe the process of consultation with any entities the reporting entity owns or controls	6