Modern Slavery 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") as a 'reporting entity' under the *Modern Slavery Act 2018* (Cth) and the *Modern Slavery Act 2015* (UK) for the reporting period of 1 July 2025 to 30 June 2026 ("Reporting Period").

The purpose of this modern slavery statement is to address the mandatory reporting criteria under applicable modern slavery legislation, including GBST's structure, operations and supply chains, the risks of modern slavery practices in those operations and supply chains, the actions taken to assess and address those risks, how GBST assesses the effectiveness of those actions, and the process of consultation with GBST group entities.

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 392 employees and contractors, as of 30 June 2026. GBST is comprised of various group companies incorporated across Australia, the United Kingdom, and Vietnam including (but not limited to) GBST Holdings Ltd ACN 010 488 874 and its wholly owned subsidiaries, GBST Wealth Management Pty Ltd ACN 050 096 770 and GBST UK Holdings Ltd (Company Number 06662908).

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 primarily focused on: (a) procuring technology for GBST clients, including software, hosting and cloud services; (b) embedding or using that technology with GBST's products and services; (c) using procured technology to assist GBST in providing products and services to clients; (d) procuring offshore software development services; and (e) procuring goods and services that support GBST's internal corporate functions and operational requirements, including office supplies, office leasing, legal services, talent acquisition and recruitment agencies, payroll systems and finance systems.

Our Policies

GBST has several policies in place to support its commitment to preventing modern slavery in its supply chains and business operations. These policies are located on the Corporate Intranet and are accessible to all employees and contractors:

- Modern Slavery Policy
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy
- Risk Management Policy & Framework
- Employee Code of Conduct
- Corporate Social Responsibility Policy
- Recruitment Policy
- Supplier Code of Conduct

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Modern Slavery Policy

GBST's Modern Slavery Policy 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 employees and contractors are aware of their obligations in relation to modern slavery and how GBST seeks to address modern slavery in its operations and supply chains. This Modern Slavery Policy is publicly available on GBST's website and shared with GBST employees and contractors on our corporate intranet.

During the Reporting Period, GBST strengthened its Modern Slavery Policy by expanding the guidance on reporting and remediation processes for modern slavery concerns. These updates provided employees and contractors with clearer instructions and direction on necessary next steps if they suspect, or become aware of, modern slavery within GBST's business or supply chains. An appendix was also included outlining examples of modern slavery to support further education and awareness.

Whistleblowing Policy

GBST's Whistleblowing Policy allows and encourages employees and contractors to raise concerns regarding a variety of matters (including modern slavery and human trafficking concerns) in a confidential manner using procedures outlined in the Whistleblowing Policy. Similarly, with GBST's Modern Slavery Policy, the Whistleblowing Policy is shared on GBST's corporate intranet for easy access to all employees and contractors. GBST is committed to creating and maintaining a non-discriminatory, open, and respectful working environment where its employees and contractors feel confident that they can report any potential 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. During the Reporting Period, there were no Whistleblower reports made in relation to modern slavery concerns.

Risk Identification, Management and Due Diligence

GBST recognises the potential risks that modern slavery practices may have on operations and supply chains. Accordingly, throughout the Reporting Period, GBST continued to implement various risk identification, management and supplier due diligence processes to monitor and reduce the likelihood of modern slavery practices in GBST's operations and/or supply chains.

GBST has a common governance framework across all GBST group entities, and the same Executive Team. As such, GBST's Executive Team has group-wide responsibilities and ultimately has general oversight across GBST. Senior managers and team leaders 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 'reporting entities' under modern slavery legislation and so have their own processes in place to identify, assess and address modern slavery risks in their respective operations and supply chains.

GBST continued to assess the risk of modern slavery within its operations and 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.

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Modern Slavery Risk Tool

As part of GBST's risk management program, in 2026 GBST completed a Slavery and Trafficking Risk Template (STRT), housed by The Social Responsibility Alliance. This is the second year this self-assessment has been completed, with GBST having also completed the STRT in 2025. The STRT is a self-assessment questionnaire used to assess exposure of modern slavery related risks in an organisation's supply chain. Whilst not definitive and utilised as a guide only, this self-assessment indicated 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 indicated that GBST does not source goods from high-risk sectors (i.e. from manufacturing or agriculture). GBST is committed to continuing to complete this self-assessment at least annually, or sooner, if material changes occur to GBST's business operations and/or supply chains.

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 'significant suppliers' 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 of 'significant suppliers'. GBST assessed the geographic locations of its significant suppliers. These suppliers are based in Australia, the United Kingdom, the United States, Poland and Vietnam and, in the context of the professional services provided by those 'significant suppliers', indicate a generally lower modern slavery risk profile.

In addition, and notably during the Reporting Period, GBST published its Supplier Code of Conduct, which sets out GBST's minimum expectations for suppliers with respect to ethical practices, including addressing modern slavery risks. GBST's Supplier Code of Conduct is publicly available and can be found on GBST's website.

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; or (d) the Supplier signed GBST's Supplier Code of Conduct (collectively, "GBST's Modern Slavery Supplier Standard").

GBST has continued its approach that if a supplier does not meet GBST's Modern Slavery Supplier Standard, GBST will either: (a) not engage with the supplier; or (b) work closely with the supplier to assist them in becoming compliant with the GBST Modern Slavery Supplier Standard before proceeding.

During the Reporting Period, GBST continued to establish and develop collaborative relationships with its suppliers to build GBST's knowledge of modern slavery risk 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.

Training

GBST continues to deliver annual mandatory modern slavery training to its employees and contractors to raise and maintain awareness of modern slavery risks and considerations across the group.

Recruitment

GBST uses reputable recruitment partners 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.

During the Reporting Period, GBST updated its Supplier Due Diligence Questionnaire to include additional questions for suppliers providing recruitment services or labour hire. These questions assess alignment with responsible recruitment principles, including the ILO Fair Recruitment Guidelines and the Employer Pays Principle.

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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 employees and contractors and the nature of contract negotiations with suppliers that continued to indicate compliance with the process.

Going Forward

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 GBST group entities, and the same Executive Team has contributed to GBST's modern slavery-related program, including this modern slavery statement. This modern slavery 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 19 October 2026.

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Signed for and on behalf of the Board on 19 October 2026



Robert DeDominicis

Director and GBST Chief Executive Officer

ACP Grosvenor Street Group Pty Ltd ACN 642 668 915

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