



Modern Slavery Statement

2024/25

Easygo Group Holdings Pty Ltd (ACN 676 669 686) and its reporting entity

1. Introduction

Easygo Group Holdings Pty Ltd (ACN 676 669 686) (**Easygo**) is pleased to submit its Modern Slavery Statement for the year ending 30 June 2025, as required under the *Modern Slavery Act 2018* (Cth) (**the Act**).

We have prepared this joint statement for Easygo together with its centrally managed wholly owned subsidiary Kick Streaming Pty Ltd (**Kick**) (ACN 663 807 645).

This statement sets out the key risks we have identified, our priority areas of focus based on our risk assessment, and the activities and measures Easygo has taken between 1 July 2024 and 30 June 2025 to prevent modern slavery and human trafficking occurring within its operations and extended supply chain.

Easygo is at its core an Australian software development company that supports companies providing leading online entertainment products offered worldwide. It works closely alongside entities that have built products including the online casino “Stake”, online streaming site “Kick.com” and various online iGaming service providers including Twist and Carrot. The Stake business has a presence in several countries including Colombia, Italy, and Peru.

Easygo strives to have full visibility of its supply chain, implementing ethical sourcing policies and training to ensure staff understand their responsibilities on how to identify potential modern slavery risks.

We acknowledge the important role that each business must play in combatting modern slavery in global supply chains. Easygo takes this responsibility in combatting Modern Slavery seriously and is continuously looking for opportunities to improve its approach where possible.

Approval by principal governing body and signature of responsible member

This modern slavery statement was prepared in accordance with Section 16 of the Act, approved by the principal governing body (as defined by the Act) of Easygo Group Holdings Pty Ltd, and signed by Edward Craven as the Sole Director of Easygo Group Holdings Pty Ltd.

Signature

Signed by:

Edward Craven

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Edward Craven

Director

Easygo Group Holdings Pty Ltd

1. Company Information

Easygo Group Holdings Pty Ltd (ABN: 50 676 669 686) is an Australian private company which was formed in April 2024. Easygo has a workforce of approximately 600 employees with its headquarters based at Level 2, 287 Collins Street, Melbourne 3000.

Live Streaming Platform

Easygo provides support to an online live streaming platform under the Kick.com banner.

Kick Streaming Pty Ltd (ABN: 59 663 807 645) is an Australian based streaming platform dedicated to providing a space for creators to produce entertainment content, including live chats, live streaming of video games, and interactive engagement with fans.

Kick operates as a digital entertainment platform. Kicks' core business involves:

- **Platform Provision:** Hosting and maintaining the technical infrastructure for live streaming.
- **Creator Support:** Providing tools and features for content creators to produce and monetise their content.
- **Audience Engagement:** Facilitating interaction between creators and their fan base through chat, subscriptions, and other features.

Online Gaming

Easygo also provides support to multiple online gaming businesses with licences held outside of Australia under the brand name "Stake":

- Stake.com (licenced in Curacao)
- Stake.co (licenced in Colombia)
- Stake.pe (licenced in Peru)
- Twist Gaming

Stake also holds a licence in Italy and operates a free to play social gaming website in the United States.

Sponsorship and Partnership

Easygo in association with the Kick and Stake brands have multiple sponsorship and partnership arrangements around the world including:

- Sauber - Formula 1 team
- Everton Football Club
- UFC

Easygo also takes pride in supporting various charitable foundations in Australia including:

- Australian Red Cross
- RSPCA

2. Operations and Supply Chain

Operations

Easygo's key business departments are primarily located in Melbourne and include the following departments: Technology, Customer Operations, Legal & Compliance, People & Culture, Marketing and Finance. Easygo also has offices in Sydney, Colombia, Peru, and Brazil, some of which have been very recently established.

Supply Chains

Our supply chains, while primarily digital, include:

- **Technology & Infrastructure:** Cloud computing services, data centers, hardware (servers, networking equipment), software licenses, and IT support services.
- **Professional Services:** Legal, accounting, marketing, cybersecurity, and consulting services.
- **Payment Processing:** Third-party payment gateways and financial institutions.
- **Human Resources:** Recruitment services, employee benefits providers.
- **Office Supplies & Services:** General office consumables, cleaning services, utilities

- **Customer services & Platform Support:** 24/7 customer services support, ticket resolution, monitoring and reporting on streamer activities and other compliance support.

Given the nature of our business, our direct modern slavery risks within our immediate operations are considered low, Easygo acknowledges that some risk still exists.

The below table provides a snapshot of the country of origin of Easygo’s suppliers alongside the “Government Response Ranking” (GRR) for each of those countries according to the “Walk Free” Global Slavery Index¹ which provides an indicator of the general risk level of suppliers in each country of origin.

This assessment is a valuable indicator as it evaluates how effectively governments are addressing the issue of modern slavery through legislation, support for victims, and the enforcement of laws against traffickers in each country. Easygo endeavors to engage suppliers from countries with higher GRRs.

Easygo Supplier Location		
Country	% of Easygo’s suppliers	Government Response Ranking*
USA	56.41	5
Australia	16.24	1
UK	8.55	2
Canada	4.27	17
Israel	3.42	97
France	1.71	13
Germany	1.71	15
Netherlands	1.71	3
Slovakia	0.85	33
Czechia	0.85	23
Serbia	0.85	56
Malta	0.85	65
Panama	0.85	57
Norway	0.85	7
Sweden	0.85	9

*According to the Walk Free Global Slavery Index 2023, based on the engagement of 180 governments.

3. Potential Risks in Easygo’s Operations and Supply Chain

During this reporting period, we analysed our supply chains and operations in relation to modern slavery risk and identified the following potential risks related to Easygo’s operations.

Risk area: Employment
Risk rating: Low

Easygo have not identified any risks within its employment practices as the majority of Easygo’s employees are employed in Australia, where there is a low prevalence of modern slavery according to the Global Slavery Index ¹.

All Easygo employees have individual contracts which are mandated to adhere to the Australian National Employment Standards which provide protections and entitlements for all employees such as maximum working hours, annual and personal leave and flexible working arrangements.

¹ Australia is ranked in the bottom 10 of the Global Slavery Index for Modern Slavery Vulnerability: <https://www.walkfree.org/global-slavery-index/map/>

Risk area: Office Suppliers (Office Supplies, Snacks, Merchandise)
Risk rating: Low

Easygo provides its employees with various office supplies, branded merchandise, food and beverages to enhance their experience at work. These types of suppliers can be at a higher risk of modern slavery occurring within their supply chains. All vendors that supply these goods for Easygo have completed our due diligence procedures to ensure no risks exist within their own supply chains. As of 2025, no risks were identified within our providers however we will continue to monitor these providers as part of the ongoing supplier management process.

Risk area: Cleaners/Building Management
Risk rating: Low

¹ The “Walk Free” Global Slavery Index is a comprehensive report that measures the prevalence of modern slavery worldwide, ranks countries, evaluates government responses, and highlights factors driving exploitation.

As mentioned above, the domestic services industry (e.g., cleaning/hospitality) has also been identified as having a higher risk of modern slavery.² Our building management and cleaning suppliers undergo the same supplier due diligence process to ensure their practices align with our expectations.

²Australian Red Cross. Addressing Modern Slavery: A Guide for Australian Businesses, 2021 [Internet], <https://www.redcross.org.au/globalassets/cms-assets/documents/migration-services/addressing-modern-slavery-report-final.pdf>

Risk area: Forced Labour in IT Hardware
Risk rating: **Medium**

Some providers of Easygo’s IT hardware such as smartphones, laptops, and servers may be linked to forced labour, especially in the mining of raw materials like cobalt which are essential for their production. Easygo understands that its suppliers conduct rigorous due diligence to identify and address these risks in their complex global supply chains.

Risk area: Exploitation of Online Workers
Risk rating: **Medium**

Some online platforms increasingly rely on “gig” workers and contractors, who may be vulnerable to exploitation. Measures are needed to protect the rights of these workers and ensure fair wages and working conditions. Easygo does not engage with technology providers that primarily use gig workers or contractors who may be at risk of exploitation.

Risk area: Lack of Transparency and Accountability among suppliers
Risk rating: **Low**

Some IT companies and providers do not adequately disclose their modern slavery risks or the steps they are taking to address them. Easygo strives to work only with providers that have greater transparency and independent audit functions to ensure they follow all rules and regulations including those around modern slavery.

4. Controls in Place to Address Modern Slavery Risk

Easygo has several measures and controls in place to ensure it does not engage with suppliers

that are directly connected to or benefit from modern slavery. Some examples are provided below.

Control	Details
Supplier Due Diligence	Easygo conducts due diligence on its suppliers to help minimize the risk of Modern Slavery occurring within the supply chain of its suppliers. This due diligence includes identification of the supplier’s country of operation and employee count, which is an indicator of risk.
Modern Slavery Policy & Procedures	Easygo has a Modern Slavery policy requiring all staff play their part in reducing the risk of Modern Slavery including not engaging with suppliers or governments who do not address these issues. Easygo policies and processes are periodically reviewed to ensure they remain fit for purpose.
Training	Easygo provides mandatory annual training for all employees on Modern Slavery, including how individuals can minimize risk within their specific roles.
Whistleblower Policy & Process	Easygo has a comprehensive Whistleblower process which allows for any member of staff to raise concerns regarding the companies’ practices, including any concerns relating to its suppliers and their adherence to Anti-Modern Slavery practices. Easygo has received no complaints concerning modern slavery risk through its whistleblower service.
Culture of Accountability	Easygo’s leadership is committed to ethical practices and ensuring a responsible supply chain, enforcing this via a strong culture of accountability.

5. Assessing the effectiveness of these measures

Easygo is planning to implement specific KPIs within relevant teams to ensure the company tracks its adherence to our obligations to prevent modern slavery in our supply chain. For example, the Procurement Team is currently implementing a process to ensure it does not engage with i) suppliers who have any past breaches or reported incidents of modern slavery; or ii)



companies that do not have appropriate governance structures. As a company in a scale-up phase, Easygo is currently setting up its formal corporate governance structures and receiving external legal advice on how to form an Easygo Audit, Risk and Compliance Committee (ARCC). As part of its role, the ARCC will assess the company’s performance and adherence to the modern slavery controls that are currently in place on a quarterly basis. Based on the company’s performance for the previous quarter, the Committee may take the following actions:

- update or set new KPIs for the team
- request an investigation on potential vulnerabilities in our supply chain if any are detected
- or request the creation of new policies or procedures to ensure the company maintains its obligations.

Easygo’s next Modern Slavery Statement will provide further detail on the actions carried out by the newly created ARCC and its adherence to the new KPIs.

6. Consultation with Reporting Entities

Easygo is making a joint statement on behalf of it and its reporting entity Kick Streaming Pty Ltd. Each of the reporting entities are centrally managed and therefore the process of consultation with the reporting entity was straightforward.

In preparing this statement, all relevant departments including the legal, finance and procurement teams as well as the key internal stakeholders were consulted.

7. Conclusion

As outlined in this statement, Easygo adopts numerous measures to minimize modern slavery risks, including implementation of a modern slavery policy, providing training to all staff on how to identify and address risks and due diligence processes required before engaging suppliers.

Easygo will continue to monitor these risks throughout its supply chain and will continually develop and improve practices.

Mandatory Criteria

We have indicated in the table below the pages of this statement which address each of the mandatory criteria in section 16 of the Act:

Mandatory Criteria	Page
(a) Identify the reporting entity	2
(b) Describe the reporting entity’s structure, operations, and supply chains	3
(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	4
(d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	5
(e) Describe how the reporting entity assesses the effectiveness of such actions.	5
(f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	6
(g) Provide any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/a