



Talent

Modern Slavery Statement

Talent International
Holdings Pty Ltd

Year Ending 30th June 2025

Modern Slavery Statement

Talent International Holdings Pty Ltd ACN 131 419 577 (“Talent”) is a reporting entity under the *Modern Slavery Act 2018 (Cth)* (the “Act”). This Modern Slavery Statement (MSS) is prepared in accordance with section 16 of the Act and describes the steps taken by Talent during the financial year ended 30 June 2025 to identify, assess and address modern slavery risks in its operations and supply chains, and how it monitors the effectiveness of those actions.

Talent recognises the importance of transparency and is committed to improving its understanding and management of modern slavery risks over time. During the reporting period, Talent has continued to build on its foundational approach, with increased focus on understanding risks associated with its labour hire model.

Structure, Operations and Supply Chains

Structure

Talent is a parent company made up of a number of Australian and international trading companies comprising: Talent Group Pty Ltd t/as Solve by Talent; Talent International (NSW) Pty Ltd; Talent International (VIC) Pty Ltd; Talent International (ACT) Pty Ltd; Talent International (QLD) Pty Ltd; Talent International (SA) Pty Ltd; Talent International Pty Ltd; Avec Global Pty Ltd; Scale by Avec Pty Ltd (established September 2025); Talent RISE Foundation Limited; Talent International (NZ) Ltd; Talent RISE Foundation (NZ) Limited; Avec Global (NZ) Ltd; Talent Aotearoa Ltd; AVEC Aotearoa Ltd; Talent International USA Inc.; AVEC USA Inc. (established September 2025); Talent UK US Inc and Talent International CA, Inc (together, the “Controlled Talent Entities”). Talent’s head office is located in Sydney, Australia.

Operations

Talent provides recruitment and labour hire services to Australian and international businesses, specialising in the recruitment of IT contractors, consultants and employees.

During the reporting period, Talent operated in Australia, New Zealand and the United States. In November 2024, Talent liquidated its India operations.

Talent directly employs approximately 356 people, with 85% based in Australia. Employees are engaged under individual contracts, with some covered by industrial agreements.

Supply Chains

Talent's supply chain includes both:

- independent contractors engaged through its labour hire model; and
- third-party suppliers providing goods and services to support its operations

During the reporting period, Talent engaged approximately 6441 independent contractors and maintained a broader supplier base of approximately 610 suppliers across Australia and internationally, including New Zealand, the United Kingdom, the United States, the Philippines, India and the European Union.

The majority of supplier expenditure is with suppliers located in Australia.

Risks of Modern Slavery Practices

Modern slavery is defined under the Modern Slavery Act 2018 (Cth) and includes serious forms of exploitation such as forced labour, debt bondage and deceptive recruiting.

Talent does not tolerate modern slavery practices and is committed to identifying, assessing and addressing risks within its operations and supply chains.

Overview of Risk Profile

As a recruitment and labour hire provider, Talent's core exposure to modern slavery risk arises through its engagement and placement of contractors within client organisations.

Talent primarily operates in the white-collar, professional services sector, placing highly skilled workers into corporate environments across Australia, New Zealand and the United States. These roles include IT professionals, senior management and executive placements and, in the context of modern slavery, are generally considered lower risk compared to sectors involving low-skilled, temporary or manual labour, particularly in higher-risk geographies.

However, Talent recognises that modern slavery risks can still arise within professional services environments. These risks may include:

- underpayment
- inappropriate working conditions
- issues related to worker classification and labour rights
- risks associated with complex contractual arrangements or third-party intermediaries

As such, Talent considers labour hire and contractor engagement to be its most material modern slavery risk area. While the overall risk profile is moderated by the nature of its workforce, the jurisdictions in which it operates, and existing regulatory protections, Talent recognises that risk can

still arise through indirect exposure and therefore requires ongoing oversight and continuous improvement in its approach to management and monitoring.

Labour Hire and Contractor Risk (Primary Risk Area)

Talent has identified labour hire and contractor engagement as its most material modern slavery risk area.

Risks may arise in the following areas:

- worker conditions at client sites
- worker classification and engagement models
- payment practices and compliance with statutory entitlements
- engagement through third-party intermediaries
- right to work and visa compliance

While these risks are moderated by the professional nature of Talent's workforce and the regulatory environments in which it operates, they are not eliminated and require ongoing oversight.

Supplier and Procurement Risk

Talent's secondary exposure to modern slavery risk arises through its supplier base.

Higher-risk categories include:

- office cleaning and facilities services
- IT hardware and equipment procurement
- print and promotional goods

These categories may involve supply chains that extend into higher-risk industries or jurisdictions.

Risk Identification Approach

Talent currently identifies modern slavery risks through a combination of internal knowledge of its operations, supplier base and industry risk factors.

This includes consideration of:

- the nature of its labour hire model
- the types of goods and services procured
- geographic locations of operations and suppliers
- known higher-risk sectors

At this stage, Talent's approach is primarily qualitative and based on management oversight, rather than a formalised or systemised framework.

Talent recognises the importance of strengthening its approach to risk identification, particularly in relation to its labour hire model and supplier base, and intends to progressively develop a more structured and risk-based methodology over future reporting periods.

Actions to Assess and Address Modern Slavery Risks

Talent's approach to addressing modern slavery risks is based on a combination of existing business practices, contractual controls and ongoing engagement with contractors, clients and suppliers.

Contractual and Compliance Controls

- Inclusion of contractual clauses addressing workplace conditions, pay and legal compliance
- Inclusion of modern slavery-related provisions in contractor agreements
- Verification of statutory working rights prior to placement

Operational Oversight and Engagement

- Ongoing engagement with contractors and clients
- Work health and safety (WHS) assessments at client sites where reasonably practicable
- Ongoing communication to identify workplace concerns

Awareness and Training

During the reporting period, Talent continued to promote awareness of modern slavery risks across its workforce through internal compliance processes.

This includes:

- inclusion of a modern slavery module within Talent's annual internal compliance training program
- completion of the annual compliance survey by employees, with a high level of participation

Talent recognises the importance of awareness in supporting the identification and management of modern slavery risks and will continue to build capability across the business over time.

Grievance Mechanisms and Remediation

Talent maintains a Whistleblowing Policy that enables employees, contractors and other stakeholders to raise concerns in a confidential manner.

This mechanism provides a pathway for individuals to report concerns relating to workplace conduct, including matters that may be relevant to modern slavery risks.

Talent also provides access to an Employee Assistance Program (EAP) for employees and contractors.

Talent is committed to reviewing and responding to concerns raised through these mechanisms in accordance with its internal policies and procedures.

Policies and Internal Frameworks

Talent maintains policies supporting ethical conduct, including:

- Anti-Bribery & Anti-Corruption Policy
- Bullying & Harassment Policy
- Code of Conduct
- Equal Employment Opportunity & Anti-Discrimination Policy
- Risk Management Policy
- Work Health & Safety Policy
- Whistleblowing Policy

Industry Standards and External Frameworks

- Labour hire licensing compliance
- ISO 9001:2015 certification
- Membership of APSCO and RCSA, which provide guidance on industry standards and regulatory developments

Approach to Continuous Improvement

Talent recognises that its current actions are primarily focused on foundational controls.

Talent is committed to strengthening its approach over time, including improving visibility of risks and developing more structured processes.

Monitoring the Effectiveness of Actions

Talent recognises the importance of assessing effectiveness in managing modern slavery risks.

Currently, monitoring is primarily based on operational processes and management oversight.

Current Monitoring Activities

- oversight of contractor onboarding processes
- ongoing engagement with contractors and clients
- monitoring compliance with contractual obligations
- review of matters raised through the Whistleblowing Program
- insights from EAP data, where available

These activities provide qualitative insights into potential risks.

Future Development

Talent intends to enhance its current primarily qualitative approach in the development of and commitment to improving its understanding and management of modern slavery risks by:

- developing measurable indicators
- improving visibility across labour hire and suppliers
- strengthening internal tracking processes

Governance

Responsibility for modern slavery risk management sits across Talent's Risk, Legal and People & Culture functions, with oversight from senior management.

Continuous Improvement and Future Focus

Talent recognises that its approach to modern slavery risk management is evolving.

Key priorities include:

- strengthening risk identification, particularly in relation to labour hire
- enhancing visibility of risks within its supplier base
- developing more structured processes to assess and manage risks
- establishing clearer indicators to measure effectiveness

Over the next reporting period, Talent also intends to:

- deliver targeted workshops with key internal staff
- improve accessibility of key policies for contractors
- enhance communication with contractors regarding modern slavery risks and reporting mechanisms
- continue to develop internal compliance training

Talent is committed to continuous improvement in line with regulatory expectations.

Stakeholder Consultation

During the reporting period, Talent undertook consultation with its controlled entities in the preparation of this Modern Slavery Statement. Relevant entities were provided with an opportunity to contribute.

This Statement was also reviewed by senior management and relevant internal stakeholders, with the support of an external consultant, prior to submission to the Board for approval.

Approval

This Modern Slavery Statement was approved by the Board of Talent International Holdings Pty Ltd on 28 March 2026.

A handwritten signature in black ink, appearing to be 'Mark Nielsen', written in a cursive style.

Mark Nielsen

Director & CEO