

Modern Slavery Statement

2026

This statement is a Joint Modern Slavery Statement made by Smartgroup Corporation Ltd and associated reporting entities in accordance with section 14 of the *Modern Slavery Act 2018* (Cth).



SmartTM

Group



Kengatha-nak-thangi Grow Mother Country

Artist Statement

Co-existing with Mother Earth from the first days of understanding of kinship and the importance of caring for Country. Preparing for the future and prospering by putting country first which started through gatherings of our ancient ancestors which continues through time to this day, Country has always been an important part of First Peoples of Australia cultures.

Country has sustained us, revitalised, and rejuvenated our mind, body, and spirit for many millennia. And by putting Country first it will continue to do so. It has been our most important commandment handed to us down throughout the generations through loving careful instructions. A nourishing thought for the ages of our continuous culture on this ancient landscape.

Narrative written by Jade Kennedy of the Tatti-Tatti/ WadiWadi/Muddi-Muddi-West Kulin Nation and Wajak/Kaardjin-NoongarNation.

Acknowledgement of Country

Smartgroup acknowledges the Custodians of Country throughout Australia. We pay our respects to them and to Elders past and present and thank them for their ongoing custodianship of this land and community.

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A message from Smartgroup's CEO



Our ongoing commitment to reducing modern slavery risks

Smartgroup maintains a high level of vigilance in identifying and addressing potential adverse human rights impacts across our operations or supply chain. We operate under a zero-tolerance approach to modern slavery in all its forms and are committed to implementing and maintaining appropriate controls designed to prevent, mitigate, and remediate modern slavery risks.

We recognise the important role we can play in ensuring ethical business practices in our operations and supplier arrangements and we remain committed to continually upholding, reviewing, and enhancing these practices. This approach ensures that we take all reasonable and appropriate steps to reduce the risk of modern slavery and to contribute to broader global efforts to eradicate it in all its forms.

In 2025, we continued to advance our Human Rights and Modern Slavery agenda, building on the foundations established through our Human Rights and Modern Slavery Roadmap. During the reporting period, we released our fourth Modern Slavery Statement, reaffirming our ongoing commitment to preventing modern slavery and protecting human rights across our operations and supply chain.

Throughout the year, we progressed key initiatives under the Roadmap, including the continued enhancement of modern slavery and environmental, social and governance (ESG) risk scanning across our supply chain. These actions reflect Smartgroup's ongoing focus on strengthening due diligence, improving risk identification and oversight, and embedding a

culture of continuous improvement in line with regulatory expectations and evolving best practice.

Smartgroup's commitment to ethical conduct and positive social impact is embedded in our core business values: Customer first always, Drive results - Always own it, and Always strive for better. These values underpin our approach to responsible business and are reflected in our ongoing and targeted investment across the three pillars of our social impact framework:

- Inclusive, equitable communities;
- Natural climate solutions and decarbonisation technologies; and
- Financial wellbeing and education.

Accountability for identifying, assessing, and managing modern slavery risks within Smartgroup's operations and supply chain is supported by dedicated group-wide procurement, finance, risk and legal functions. These functions are supported by the Group Legal Team, overseen by the Group Executive Leadership Team, and subject to Board oversight.

Strategic governance and oversight of modern slavery risk management sit with Smartgroup's ESG Board Committee, established in 2021. The ESG Committee operates under a formal Charter and is responsible for monitoring the effectiveness of our approach to modern slavery risk, ensuring alignment with legal obligations and contemporary best practice. The ESG Committee Charter is publicly available [here](#).

We are committed to upholding, reviewing and improving ethical business practices and ensuring we remain accountable for our role in helping to eradicate modern slavery in our global communities.

In 2022, the Board endorsed a formal Sustainability Strategy, containing a comprehensive set of targets and initiatives. Our 2025 Sustainability Report outlines the status and progress of these initiatives. Since endorsement, Smartgroup has made progress against these initiatives, including the completion of modern slavery risk assessments for all Tier 1 and Tier 2 suppliers, the development and endorsement of our first Environmental Management Policy and the adoption of our Human Rights and Modern Slavery Roadmap.

We have continued to strengthen our responsible procurement practices by enhancing our ESG assessment framework and embedding ESG credentials into the procurement due diligence process for all new Tier 1 suppliers, which has been progressively implemented. During the reporting period, Smartgroup also issued new Modern Slavery Questionnaires to all Tier 1 and Tier 2 suppliers, further strengthening supplier engagement, accountability, and ongoing risk visibility across the supply chain.

This Statement outlines the tangible steps and actions that Smartgroup has taken to ensure that we have:

1. Clear insight into the risk of modern slavery across our own operations and supply chains;
2. Established processes to support suppliers in understanding and appropriately managing modern slavery risks within their operations and supply chains; and
3. A defined and targeted plan to address and mitigate any modern slavery risks identified within our operations and supply chains.

Scott Wharton

Scott Wharton
Chief Executive Officer

Our structure, operations and supply chains

Smartgroup recognises that strong governance is fundamental to identifying, assessing and managing risks. Our values guide our behaviours and decision making and underpin our commitment to acting ethically and responsibly in our dealings with customers, employees, suppliers, investors and the communities in which we operate.

Our business, structure and operations

Smartgroup is an Australian based organisation that simplifies salary packaging, novated leasing and fleet management solutions to employers across Australia. Our services support organisations in government, healthcare, not for profit, education and corporate sectors.

Delivering an exceptional experience for our employer clients and their employees is central to our business model. This is supported by industry-leading digital platforms that we develop, high volume customer service operations and a skilled, customer-focused workforce. We recognise that employee engagement and capability are critical to ensuring positive outcomes and maintaining responsible business practice.

As a 31 December 2025, we had approximately 788 employees working across Australia, with offices in Sydney, Melbourne, Adelaide, Brisbane, Canberra and Perth.

The majority of our Australian workforce is employed on a full-time permanent basis (91.9%) with the remainder comprising of part-time and fixed-term arrangements (8.1%).

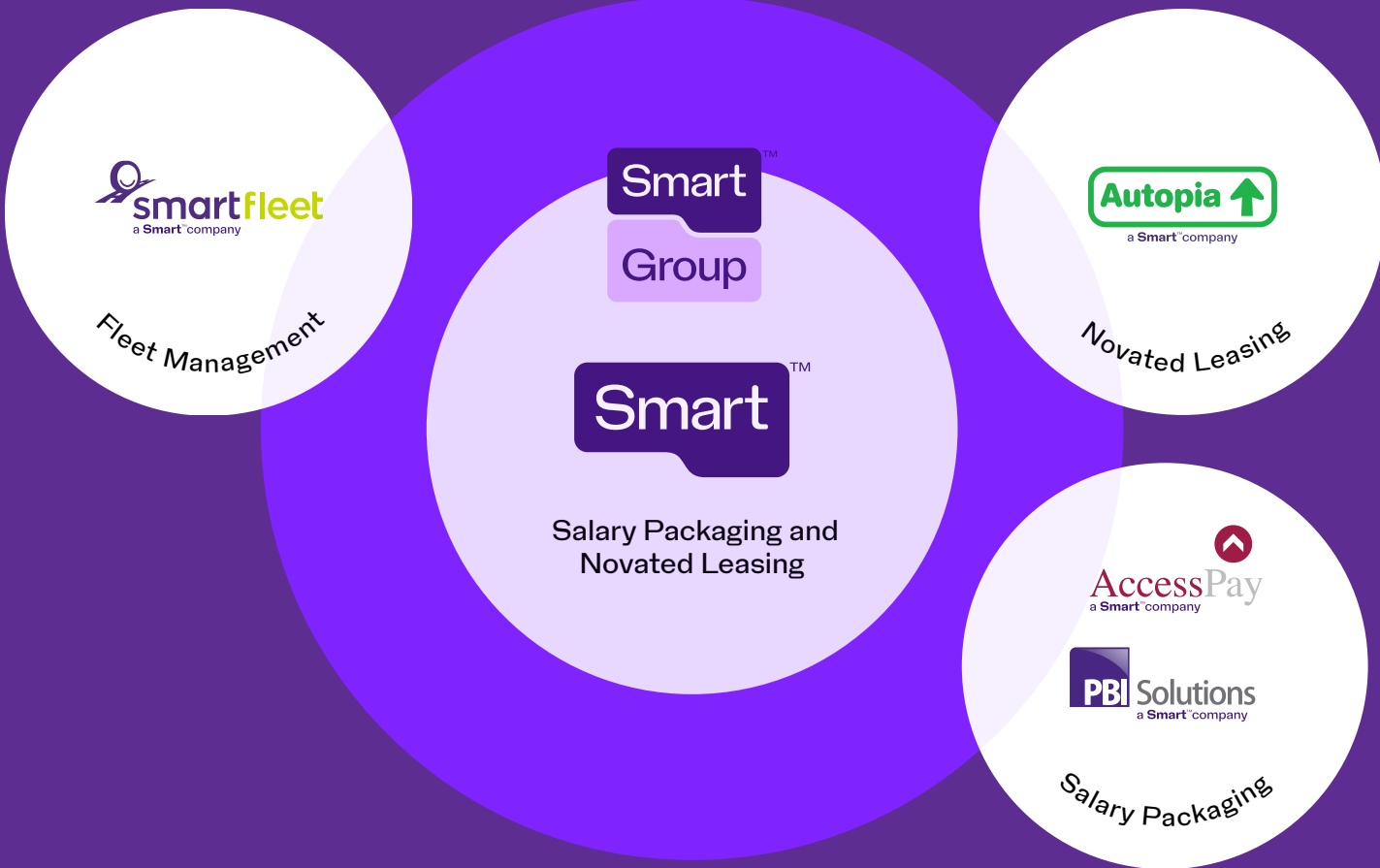
We also had 47 full-time equivalent nearshore workers in the Philippines who are not employees, in addition to 74 other onshore workers including temporary workers employed by temp agencies and independent contractors.

Roles performed by workers who are not employees commonly include customer service consultants engaged through preferred recruitment agencies on a temporary basis, as well as specialised technology roles such as software developers, testers, business analysts and IT support analysts).

Our nearshore workforce in the Philippines is employed by Satellite Office and work exclusively for Smartgroup as part of our integrated working model. These team members are subject to our modern slavery risk assessment processes and are included within the scope of our modern slavery framework.

Further information about Smartgroup and our operations is available at:

<https://www.smartgroup.com.au/what-we-do>



Goods and services we buy

As a provider of employee benefits to employers across Australia, Smartgroup procures a range of goods and services to support the delivery of our services to clients and the operation of our business, including managing the offices from which we work.

During the reporting period, Smartgroup sourced goods and services from over 1,200 suppliers, the majority of whom operate within Australia. We also engage a small number of overseas suppliers, primarily in the areas of outsourced technology and professional services.

Did you know?

95%

Of our vendors are Australian based.

Goods and services we buy include:



Corporate real estate leasing



Office facilities and products



Human resources services



Financial services



Information and research services



Marketing and events



Fuel and maintenance for vehicle fleet



Professional services



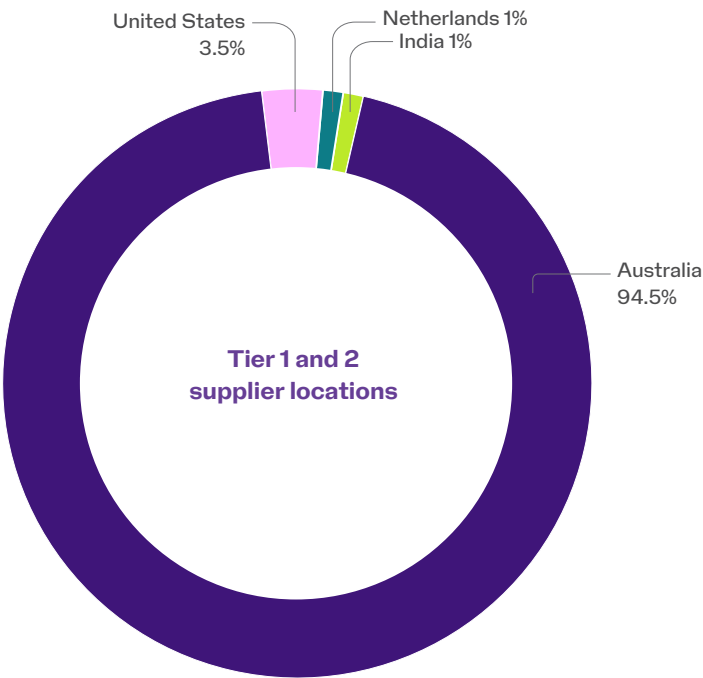
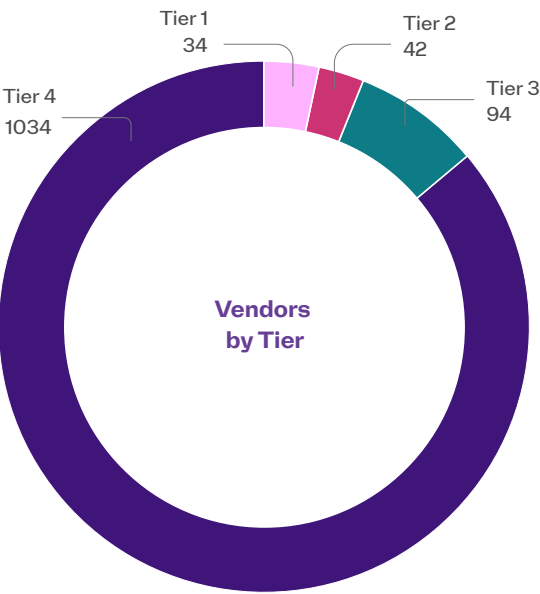
Travel services and products



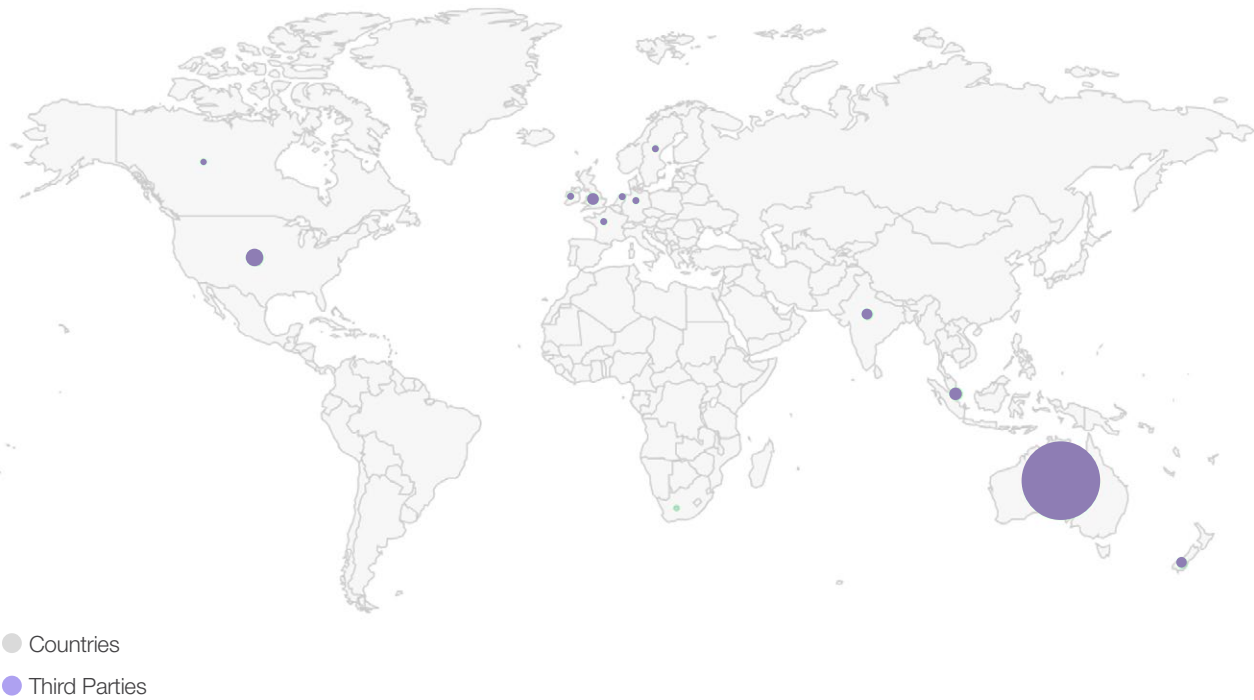
Technology services and products

Supply chain

Of our suppliers we have 34 Tier 1 suppliers and 42 Tier 2 suppliers, with 95% of these Tier 1 and 2 suppliers (by number) operating in Australia.



Supplier business operations



Assessment of modern slavery risks in our supply chains

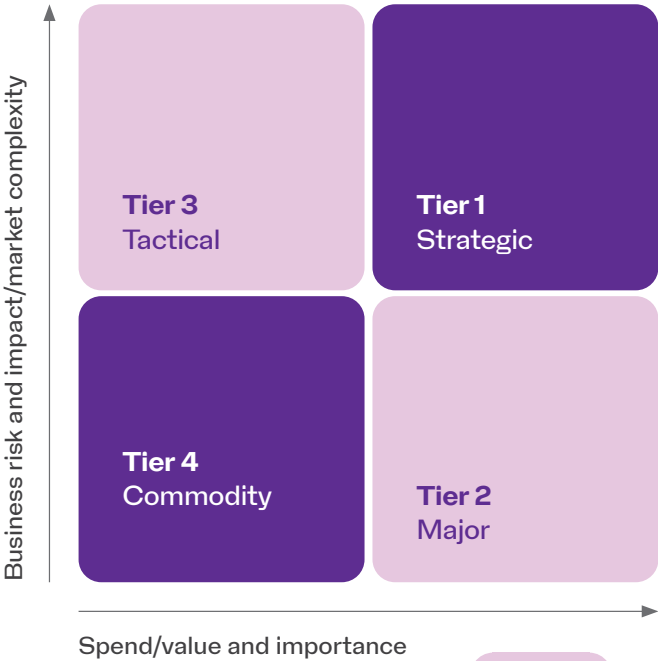
We have assessed the categories in which we incur material expenditure on goods and services and determined that they present a low inherent risk to modern slavery, based on the following factors:¹

- Vulnerable populations** – Personal characteristics or circumstances that may lead people to be more susceptible to harm;
- High-risk business models** – Practices that reduce visibility between product or service beneficiaries and the provider’s labour conditions;
- High-risk geographies** – Locations where human rights protections are weaker or obscured from oversight; and
- High-risk categories** – Known high-risk products and services, based on the confluence of the above risk factors, which are often sector specific.

- Our assessment further considered:
- All Smartgroup employees are aged 18 years or over;
 - As a financial services and employee benefits provider, our workforce is predominately engaged in office based and home-based roles or roles, as well as roles which involve travel to and engagement at client sites. We consider these activities as low risk for the purpose of modern slavery;
 - We undertake annual remuneration reviews, including assessments of wages to ensure compliance with applicable legislative requirements. No material instances of wage underpayments have been identified and we maintain compliance measures to monitor and mitigate this risk on an ongoing basis;
 - We continue to undertake gender pay gap reviews and implement corrective actions where required to ensure pay equity across ‘like for like’ roles;
 - Our commitment to diversity, equity and inclusion has been continually recognised externally including being named an Employer of Choice for Gender Equality by the Workplace Gender Equality Agency and as an Inclusive Employer by Diversity Council Australia.

¹ Source: Typologies and Indicators of Modern Slavery Working Paper Edition 1 March 2022 – Australian Banking Association and KPMG

Our assessment process is prioritised according to the materiality of spend as well as strategic value of services that a supplier provides to Smartgroup as follows:



Tier 1

Strategic Vendor
Spend exceeds \$1M pa.
Suppliers are aligned to Smartgroup’s IT and business strategy.
Significant impact on business and provides significant business value.
Vendors are committed to sharing the risk and are governed by senior executives on both sides of the relationship.

Tier 2

Major Vendor
Annual spend between \$500k and \$1M. Critical to business operations.
High risk vendors.
Reasonably complex and/or deeply integrated into overall business operations.
High switching cost.
Strategic growth decision or for market positioning.

Tier 3

Tactical Vendor
Annual spend between \$100K and \$500K. Low – medium switching cost.
Unique vendor capabilities (including sole source, IP dependant, etc.).
Limited vendors and/or only readily available from a single source.
SG to maintain a level of investment (or increase) over time.

Tier 4

Commodity Vendor
Limited technical complexity or existing capability.
Goods and services are readily available.
Existing alternate products and services.
Low value, small individual transactions or once-off purchase.
Many existing alternate products and services.
Large number of vendors.
“Anyone” could buy it.

Identifying modern slavery risks in our supply chains

We continually seek to identify, assess and manage modern slavery risks within our supply chain by building awareness,

strengthening policies and processes and enhancing our due diligence practices.

In 2024, our Human Rights and Modern Slavery Roadmap was endorsed by the Board, reinforcing our commitment to mitigating human rights and modern slavery risks across our supply chain. We have continued to make progress on delivering on these commitments by strengthening our procurement and vendor management policies to reinforce ethical sourcing expectations.

In 2024, we completed third-party Modern Slavery assessments for all Tier 1 and Tier 2 suppliers through the Ethixbase360 platform, using the Perceived Risk Indicator (PRI), Instant Due Diligence (IDD) reporting and our Modern Slavery Questionnaire. Building on this work, we refreshed supplier assessments by issuing updated Modern Slavery Questionnaires to all Tier 1 and Tier 2 suppliers, further strengthening our due diligence processes.

During 2025, we continued to embed Modern Slavery assessments at key points in the procurement lifecycle, including new vendor onboarding, contract renewal, and in response to potential incidents. Tier 1 and Tier 2 suppliers are required to complete a Modern Slavery Questionnaire at each stage, with this requirement also applying to Tier 3 and Tier 4 suppliers operating in Australian Government-identified high-risk sectors.

We also strengthened the robustness of our ESG assessment framework through third-party assessment tools and enhanced audit trails within the Ethixbase360 platform. ESG credentials were embedded for new Tier 1 suppliers and we intend to extend this for Tier 1 and Tier 2 suppliers through reassessment in 2026. We also expanded ESG assessments to additional vendors and criteria, consistent with our sustainability strategy and our engagement with suppliers on emissions data, emissions reduction strategies, and progress tracking.

Did you know?

We continually seek to identify, assess and manage modern slavery risks within our supply chain by building awareness, strengthening policies and processes and enhancing our due diligence practices.

An overview of our IDD reporting and Modern Slavery questionnaire process is set out below.

a. Instant Due Diligence (IDD) Reporting

An IDD report provides a preliminary risk indicator for our suppliers based on the following:

- i. **Company Registry Information** – we run a check of the relevant supplier organisation names against a global database of over 170 million online registry records. Where available, ethixbase verifies that the supplier organisation is legally registered.
- ii. **Sanctions & Enforcements Lists** –as part of the IDD process, company names and any associated individuals identified through the Company Registry search are screened against a global database of sanctions and enforcement lists.
- iii. More than 1,200 checks have been conducted since 2022 on companies in our supply chain.

b. Modern Slavery Questionnaire

Our Modern Slavery Questionnaire was developed by ethixbase in collaboration with Norton Rose Fulbright’s Risk Computations for Third Parties, drawing on global legal and human rights expertise.

The Modern Slavery Questionnaire uses advanced analytics to generate tailored risk profiles identifying specific modern slavery and human rights risks across the supply chain. Risks are assessed by weighing suppliers’ responses against defined criteria and relevant third party databases, including factors relating to jurisdiction, business activities, workforce, policies, systems and human rights impacts.

The Modern Slavery Questionnaire assesses the following five key areas associated with human rights risk:

1. Business activities (industries)
2. Geographic footprint
3. Second and third-tier supply chains, including the potential presence of sanctioned products in the supply chain
4. Employee health and safety practices, policies, processes and training.
5. Compliance with the client’s supplier code of conduct/adequate procedures requirement

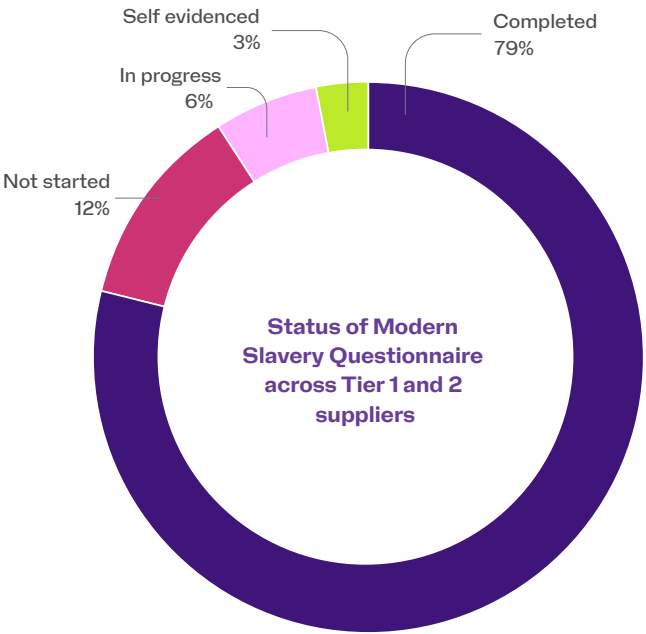
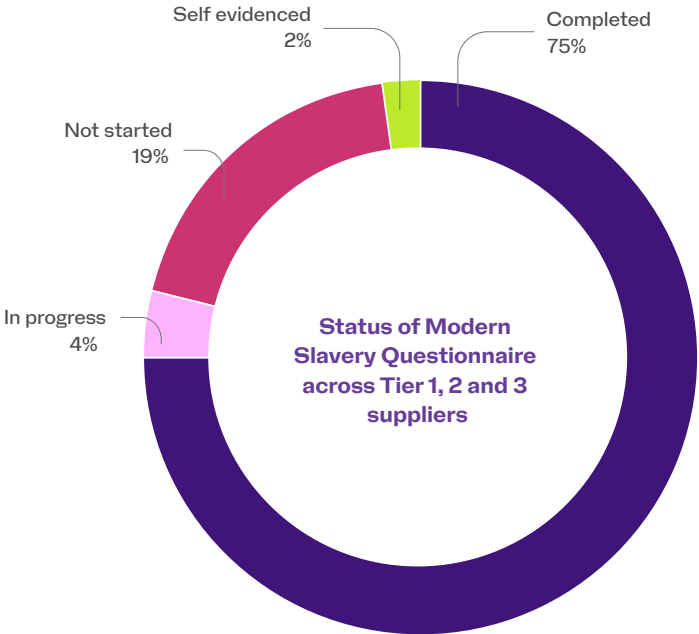
As noted above, our Modern Slavery Questionnaire has been reissued to all Tier 1 and Tier 2 Suppliers and we continue to work with our Suppliers to ensure all surveys are completed and submitted as part of our due diligence assessment.

We have experienced a delay in our plan to extend Modern Slavery Questionnaires to all Suppliers in our supply chain who are operating in high-risk industry sectors or in higher-risk countries as identified by the Australian Government, the United Nations and the Global Slavery Index and we now plan to complete this in 2026.

Given the breadth and complexity of our supply chain, there remains an inherent risk of potential adverse impacts on human rights.

We maintain a zero tolerance for modern slavery in any form within our operations and supply chain and are committed to continuous improvement of our practices to reduce modern slavery risks across all aspects of our business. We also remain committed to supporting global efforts to eradicate all forms of modern slavery.

We are pleased that, to date, our reviews have not identified any instances of modern slavery within our own operations. One instance of a historical high-risk practice was identified in our supply chain, which was appropriately addressed and satisfactorily resolved.





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Did you know?

Other actions taken to assess and address modern slavery risks

1. Policies

Our Procurement Policy

Smartgroup's Group Procurement Policy outlines requirements relating to risk management, regulatory compliance and guidelines, and commercial and operational considerations in the engagement and management of suppliers. This policy requires Group Legal to review all supplier contracts and proposed terms and conditions prior to execution to ensure compliance with the Modern Slavery Act.

Speak Up Policy

Smartgroup's Speak Up Policy is designed to encourage employees and external stakeholders, including suppliers, to raise concerns about potentially unethical, unlawful or improper practices or behaviours, without fear of reprisal.

Smartgroup encourages confidential reporting of actual or potential instances of reportable misconduct via the Smartgroup Speak Up Portal, which is hosted on the Whispli platform. Reports submitted through the portal are assessed by an independent third-party provider to enhance confidentiality and support the appropriate handling of concerns.

Human Rights Policy

A Board endorsed Human Rights Policy was adopted in April 2023 setting out Smartgroup's commitment to identifying, preventing and addressing potential human rights impacts arising from its operations and supply chain.

Copies of these policies, and a range of other Smartgroup policies are available at our [website](#).

2. Modern Slavery Training

Modern Slavery training

Members of the Executive Team, Senior Leaders and the People and Culture Team are required to complete mandatory e-learning training on the Modern Slavery Act and Smartgroup's response to identifying and managing modern slavery risks.

Amongst other things, the training covers obligations under the Modern Slavery Act, relevant internal policies and procedures regarding modern slavery, procurement and Smartgroup's response to identifying, assessing and responding to potential modern slavery risks in its operations and supply chains.

Refresher training is conducted annually to maintain awareness and reinforce accountability.

3. Supplier contracts

Our supplier contracts include modern slavery clauses that require suppliers to:

1. Comply with the Modern Slavery Act and any other applicable legislation prohibiting modern slavery practices;
2. Take reasonable steps to ensure there is no modern slavery within their or the supply chains of their agents, or in any part of its business;
3. Notify us of any issue identified in their supply chains or any relevant convictions or investigations regarding modern slavery; and
4. Implement and maintain appropriate due diligence procedures to mitigate modern slavery risks in their supply chains.

Assessing the effectiveness of our actions

Our process begins with the Perceived Risk Indicator (PRI). The PRI is a grading system provided by ethiXbase to assess the potential risk associated with an entity.

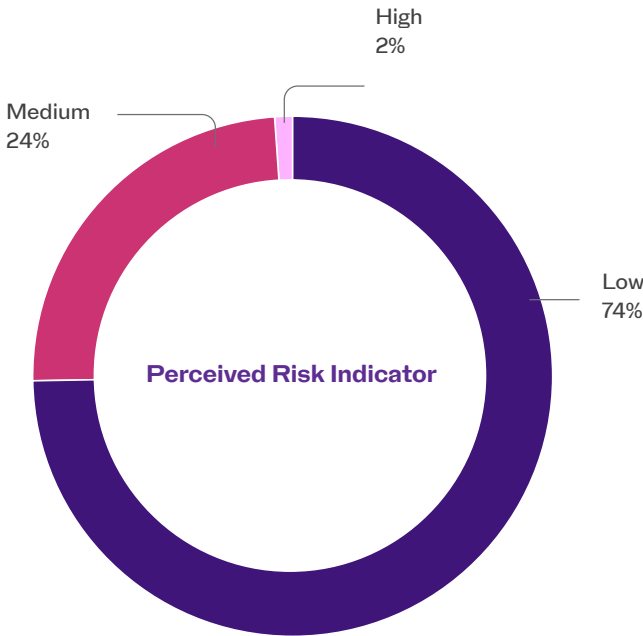
It serves as a rating tool to support decision making during due diligence activities.

An example of a PRI risk rating may be based on three factors, each with its weightage:

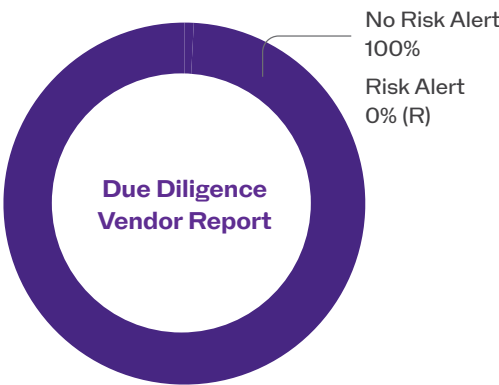
- The third party’s industry (25%)
- Its geographical location (25%)
- Its public risk profile (50%)

Based on our ongoing assessments, we are pleased to note that there has been little change in metrics year on year. This outcome aligns with expectations, as no material risk issues have been identified through previous assessments.

Of more than 1,000 suppliers assessed, we identified 2% with High perceived risk indicators and 24% with Medium perceived risk indicators:



When further investigated and IDD reporting completed, we found that in the 26% of suppliers flagged with medium and high perceived risk indicators, none of the suppliers were identified on a Watchlist or had a valid Sanction or Enforcement.



Based on our assessment our average Supplier Risk across our suppliers is 3.48*

*Supplier Risk is classified as:
1-4 Low, 5-7 Moderate, 8-10 High

Plans for future action

We’re committed to taking specific actions to reduce the risk of modern slavery in all aspects of our business. We have refreshed our targets for 2026, and will focus on:

- We will continue to develop and publish a Supplier Code of Conduct which defines Smartgroup’s ethical, social and environmental core values and standards which we expect all suppliers to adhere to.
- We will continue to work towards extending the modern slavery risk assessment to all suppliers within our supply chain who are operating in high-risk industries or in higher-risk geographic areas as identified by the Australian Government, the United Nations and the Global Slavery Index by the end of 2026.
- We will continue to expand ESG assessments to additional vendors and criteria, consistent with our sustainability strategy and increase supply-chain engagement on emissions data, emissions reduction strategies and progress.

- We intend to increase our engagement of diverse suppliers such as B Corps, female-owned companies, Aboriginal and Torres Strait Islander businesses, SMEs, and Not-for-Profit enterprises by the end of 2028.
- We have an ongoing partnership with Supply Nation to track our supplier spend with Aboriginal and Torres Strait Islander businesses. We are proud to report that our spending with Supply Nation-registered suppliers increased by over 100% during the reporting period. In addition, we recorded indirect Tier 2 spend of more than \$1.8 million with indigenous businesses. Through this partnership, we continue to identify suppliers that meet diversity criteria and run targeted initiatives aimed at sustainably increasing supplier engagement and spend in these areas.
- We are continuing to source more sustainable products that meet our environmental and social criteria and support our overall sustainability performance.



Consultation with subsidiaries in preparing this statement

Smartgroup has group-wide procurement, finance, risk and legal functions that govern procurement, finance, risk and legal matters for all subsidiaries of Smartgroup Corporation. Further, all supply arrangements are channelled through the group wide procurement, finance and legal functions.

Accordingly, there is one management team responsible for coordinating Smartgroup’s response to Modern Slavery risks in its operations and supply chains and preparing this statement.

Reporting entities

Smartgroup Pty Ltd (ACN) 126 266 831 has made this statement according to section 16 of the <i>Modern Slavery Act 2018</i> . The statement applies to the following Smartgroup entities:	
1. Smartgroup Corporation Ltd (ACN 126 266 831)	10. Selectus Pty Ltd (ACN 116 270 501)
2. Smartgroup Foundation Ltd (ACN 631 512 162)	11. ABM Corporation Pty Ltd (ACN 137 874 741)
3. Smartgroup Benefits Pty Ltd (ACN 119 344 740)	12. Pay Plan Pty Ltd (ACN 086 752 534)
4. Autopia Management Pty Ltd (ACN 111 369 049)	13. SET Leasing Pty Ltd (ACN 121 686 673)
5. Smartfleet Management Pty Ltd (ACN 142 370 643)	14. Australian Vehicle Consultants Pty Ltd (ACN 088 563 464)
6. Smartsalary Pty Ltd (ACN 096 796 100)	15. Fleet West Pty Ltd (ACN 116 808 461)
7. Salary Packaging Solutions Pty Ltd (ACN 092 250 989)	16. PBI Benefit Solutions Pty Ltd (ACN 099 401 751)
8. AccessPay Pty Ltd (ACN 098 850 803)	17. Smartsalary Software Solutions Pty Ltd (ACN 076 050 283)
9. Autopia Group Pty Ltd (ACN 109 098 008)	

Approval of statement

In accordance with section 13 of the Modern Slavery Act, this statement was approved by the Board of Smartgroup Corporation Ltd (ACN 126 266 831) on 15 June 2026.

Cross reference to modern slavery act

Statement Reference (with link)	Act reference	Reporting requirement summary
A Message from Smartgroup's CEO on behalf of the Smartgroup reporting entities	Section 16.1 (a)	Identify the reporting entity.
Our Business Structure and Operations	Section 16.1 (b)	Describe the structure, operations, and supply chains of the reporting entity.
Modern Slavery Practices in our operations and Supply chains	Section 16.1 (c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.
	Section 16.1 (d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.
Assessing the effectiveness of our actions	Section 16.1 (e)	Describe how the reporting entity assesses the effectiveness of such actions.
Consultation with subsidiaries in preparing this statement	Section 16.1 (f)	Describe the process of consultation with any entities that the reporting entity owns or controls; and in the case of a reporting entity covered by a statement under section 14 – the entity giving the statement.
Plans for future action	Section 16.1 (g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.

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