

KELLY PARTNERS GROUP HOLDINGS LIMITED MODERN SLAVERY STATEMENT 2025

1. INTRODUCTION

This Modern Slavery Statement is made on behalf of Kelly Partners Group Holdings Limited (ACN 124 908 363) and its controlled entities ("Kelly+Partners", "Group", "We") pursuant to the Modern Slavery Act 2018 (Cth) for the period 1 July 2024 to 30 June 2025.

Kelly+Partners is committed to maintain human rights and does not condone practices that constitute modern slavery. We recognise the responsibility to manage the risks associated with modern slavery infringements. Kelly+Partners ask its employees, clients, partners to raise any issues or concerns regarding potential infringements or modern slavery practices.

2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Kelly Partners Group Holdings Limited ACN 124 908 363 (ASX: KPG) is a publicly listed company incorporated in Australia and has its office at Level 8, 32 Walker Street, North Sydney NSW 2060 Australia.

Kelly+Partners is a specialist chartered accounting network which consists of 40 operating businesses with the primary focus on providing accounting, taxation and other business advisory services to private clients, private businesses and private business owners. Kelly+Partners employs over 600 people, including over 100 partners across in Australia, Hong Kong, India, the Philippines, United States, United Kingdom and Ireland.

Kelly+Partners' supply chain consists of those entities that support the provision of our accounting, taxation and professional services in the geographies which we operate. Our supply chain includes leases for the properties we occupy, catering and cleaning services, some outsourced business process services, recruitment and employment agencies and the purchase of goods including office furniture, supplies, IT software and hardware.

The vast majority of goods and services are sourced locally in Australia and in the United States. However, we acknowledge that some local suppliers may also have international supply partners. As this may increase the risk of modern slavery we are dedicated to identifying the origin of these goods and services.

3. THE RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

3.1 Kelly+Partners' own operations

Kelly+Partners is required to adhere to regulations and professional conduct standards in the jurisdictions in which we operate, including labour and award safeguards for employees, as well as safe working environment protections.

Given the nature of our professional services, we consider the risk of modern slavery in our own operations to be very low as both the industry and jurisdictions in which we operate present a low inherent risk of forced labour, child labour and other forms of modern slavery.

The key factors that support a low risk rating in the professional services industry include the office-based nature of work, low proportion of characteristically vulnerable workers typically found within the workforce and the higher level of skill required to perform the work within the accounting sector.

3.2 Kelly Partners' supply chain

We recognise that through our supply chain, we can be indirectly exposed to the risk of modern slavery.

Our suppliers are predominantly located within Australia and the United States. Both jurisdictions are rated 'low risk' according to the internationally recognised Walk Free 2023 Global Slavery Index and the US Department of States' 2023 Trafficking in Persons Report.

Kelly+Partners is continuing to assess its modern slavery risk in its supply chain based on location, goods and services supplied, high risk sectors or industries and entity-specific risks.

4. ACTIONS TAKEN TO ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS

Kelly+Partners has adopted group-wide policies and procedures relating to ethical work practices and legal complaint business practices designed to mitigate our exposure to modern slavery and human right risks. All Kelly+Partners employees have the responsibility to act with integrity and in accordance with the corporate policies, including:

- Modern Slavery Policy
- Code of conduct
- Bullying & Harassment Policy
- Work Health and Safety Policy
- Office Etiquette Policy
- Diversity and Inclusion policy
- Anti-Bribery and Corruption Policy
- Whistleblower Policy

Kelly + Partners requires all team members to acknowledge the companies' policies and complete ongoing training to ensure a competent understanding of a safe and respectful work environment. We support and encourage the reporting of any improper conduct witnessed.

Our approach to preventing and mitigating the risk of modern slavery in our supply chain includes dealing with reputable business within Australia and internationally.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We measure the effectiveness of our actions using the metrics summarised in the following table:

Action	Metric	Details
Reporting and monitoring mechanisms	Number of instances of reported issues concerning modern slavery Number of reported instances escalated to the Board of Directors	No reports of modern slavery were made to Kelly+Partners regarding our own practices or those of our suppliers during the financial year ended 30 June 2025.

5. PROCESS OF CONSULTATION

Kelly+Partners takes a collaborative approach in combatting modern slavery. We consult and engage with our controlled entities to ensure that the modern slavery risks relating to our controlled entities have been appropriately identified and that its related entities are aware of what actions it needs to take.

Other parts of our consultation process include group wide assessments, training programs, supplier data sharing and discussions with relevant stakeholders of our controlled entities.

As part of our ongoing process improvement, these consultations will continue to run and be refined over time to achieve process efficiencies.

6. BOARD APPROVAL

This statement was approved by the Board of Directors of Kelly+Partners on 12 December 2025

Signed for and on behalf of the Board of Kelly Partners Group Holdings Limited



Brett Kelly
Founder and Executive Chairman
12 December 2025