

Cloudstaff Modern Slavery Statement

2026



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Cloudstaff Holdings Pty Ltd is a leading outsourcing company that provides businesses with high-quality, cost-effective outsourcing solutions. Cloudstaff Holdings Pty Ltd is the fusion of great people, innovative technology, and a culture that engages our staff and promotes personal and professional growth.

Cloudstaff's goal is to 'help businesses grow'. This is our 'Why statement' and we are dedicated to achieving this goal while upholding a code of ethics and conduct that encourages workplace diversity, environmental awareness, and constructive social change.

Cloudstaff is aware that modern slavery takes various forms, such as slavery, involuntary servitude, forced labor, inhumane treatment, child labor, human trafficking, and all other acts that deprive a person's liberty by another in order to exploit them for personal or commercial gain.

Cloudstaff does not tolerate any form of modern slavery. We actively work to prevent any risk of modern slavery within the business and comply in full with our obligations under applicable laws relating to slavery of all forms in locations where Cloudstaff has existing or future operations.



Our Values



Staff

Cloudstaff is committed to ensuring that our staff are valued, respected, and kept safe at all times, without exception.

We encourage both personal and professional development and pay our staff a professional level local salary that allows them to support their families and strive for major investment goals.



Community

We understand the importance of community and have built and fostered relationships with many local educational institutions and community groups to provide sponsorship, mentorship, and training opportunities.

We are humbled that, in some small way, we have had a positive impact on the communities where we work.



Environment

We care deeply about the environment and believe that all companies, big and small, have an obligation to be responsible corporate citizens.

We have a number of policies in place regarding consumables, power management, and recycling. We are continually looking for ways to reduce the impact we have on the environment.



Equality

Cloudstaff values diversity and rejects discrimination in all forms. We strive to build an inclusive workplace and are committed to equal pay and merit-based hiring.

All staff should feel safe, valued, and accepted. Confidential reporting systems are in place to ensure that everyone's voice can be heard.



Family support

Cloudstaff's family-friendly workplaces offer parents the assistance they need to raise families while still developing their careers.

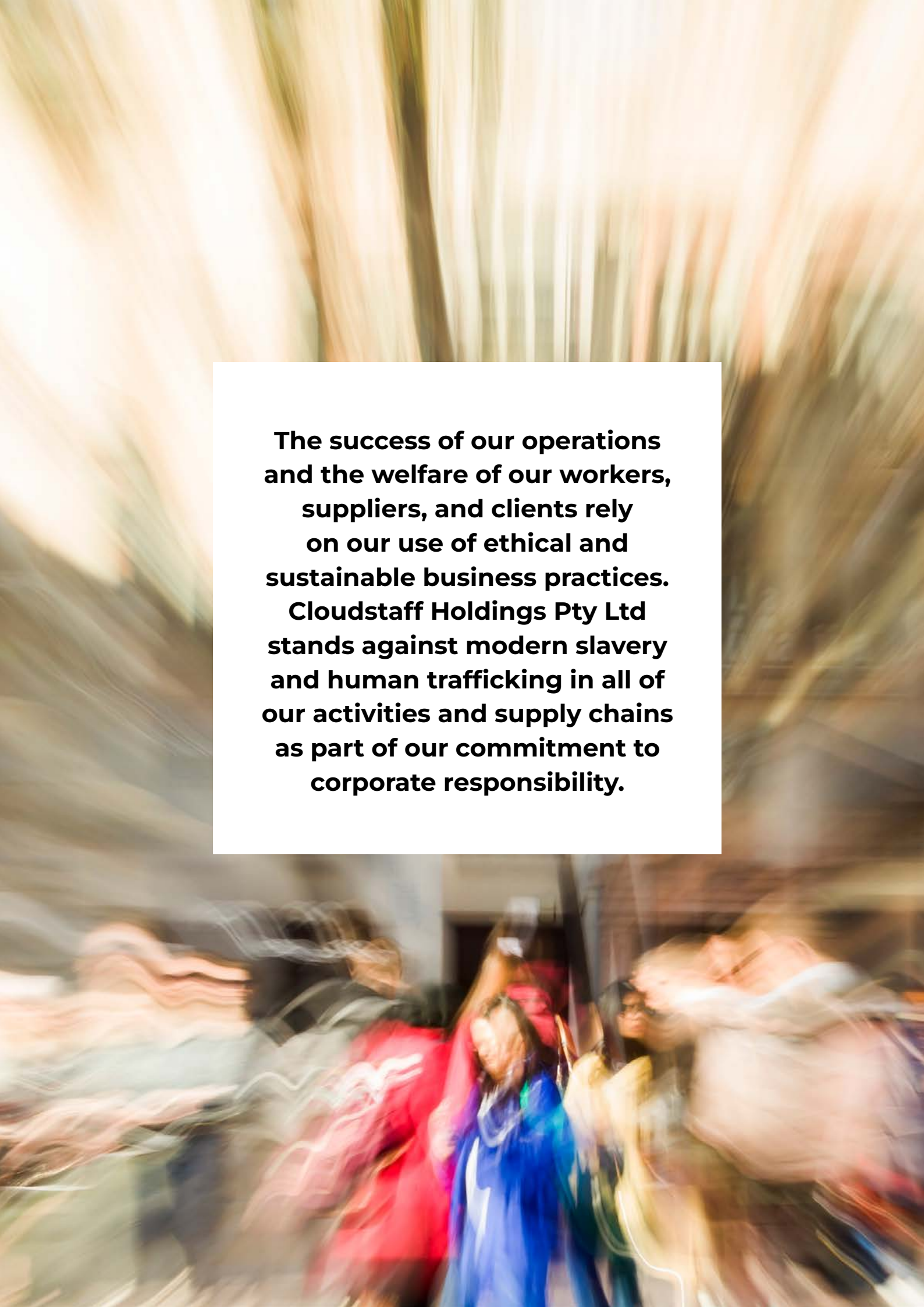
We provide free in-house child care facilities, as well as full maternity and paternity leave. Staff are also encouraged to bring their families to all major company events.



Health & wellbeing

The health and wellbeing of our staff is paramount.

Cloudstaff provides free in-house doctors, nurses and psychology services to all staff. Appointments are made using Cloudstaff Tap, a mobile app designed to keep all of our staff connected.

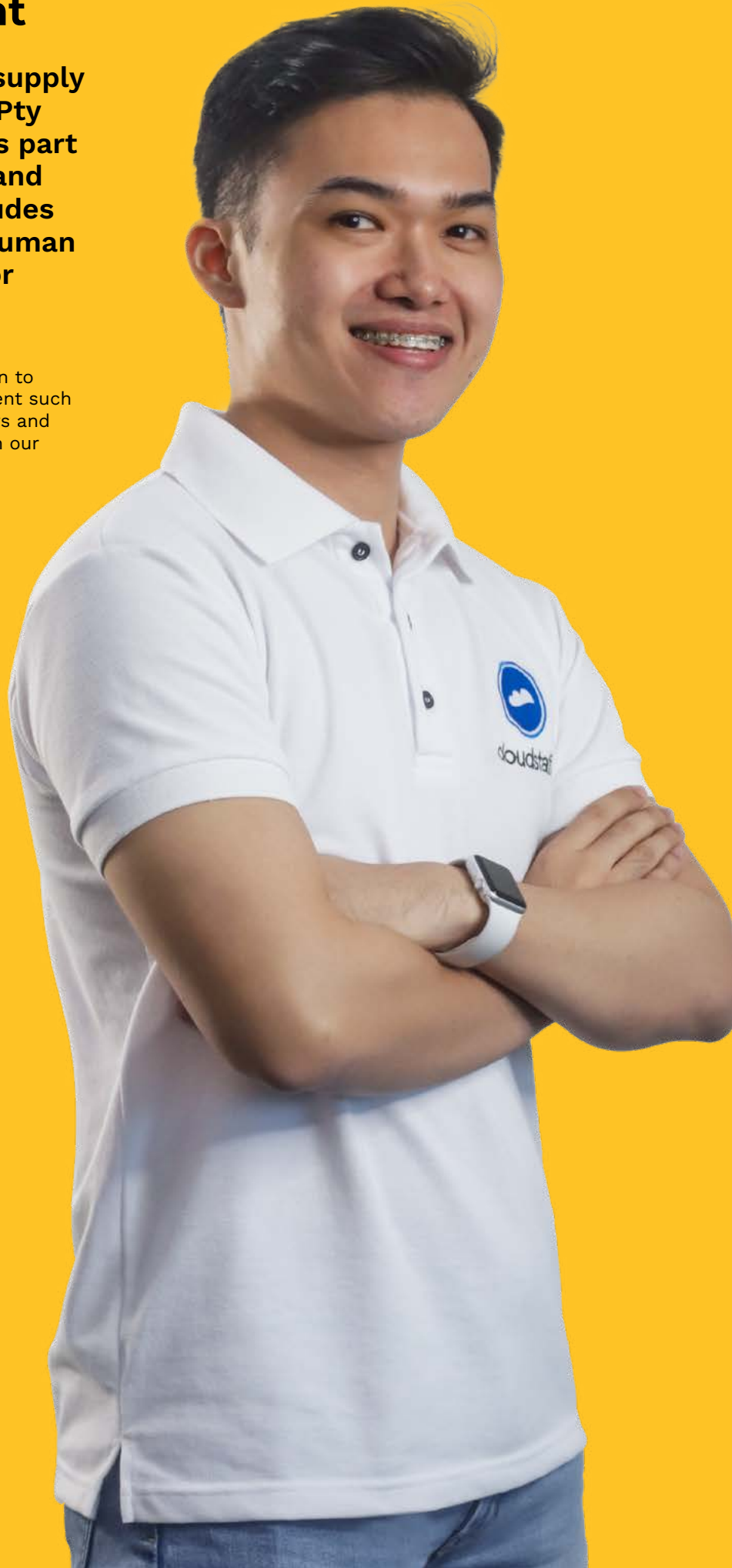


**The success of our operations
and the welfare of our workers,
suppliers, and clients rely
on our use of ethical and
sustainable business practices.
Cloudstaff Holdings Pty Ltd
stands against modern slavery
and human trafficking in all of
our activities and supply chains
as part of our commitment to
corporate responsibility.**

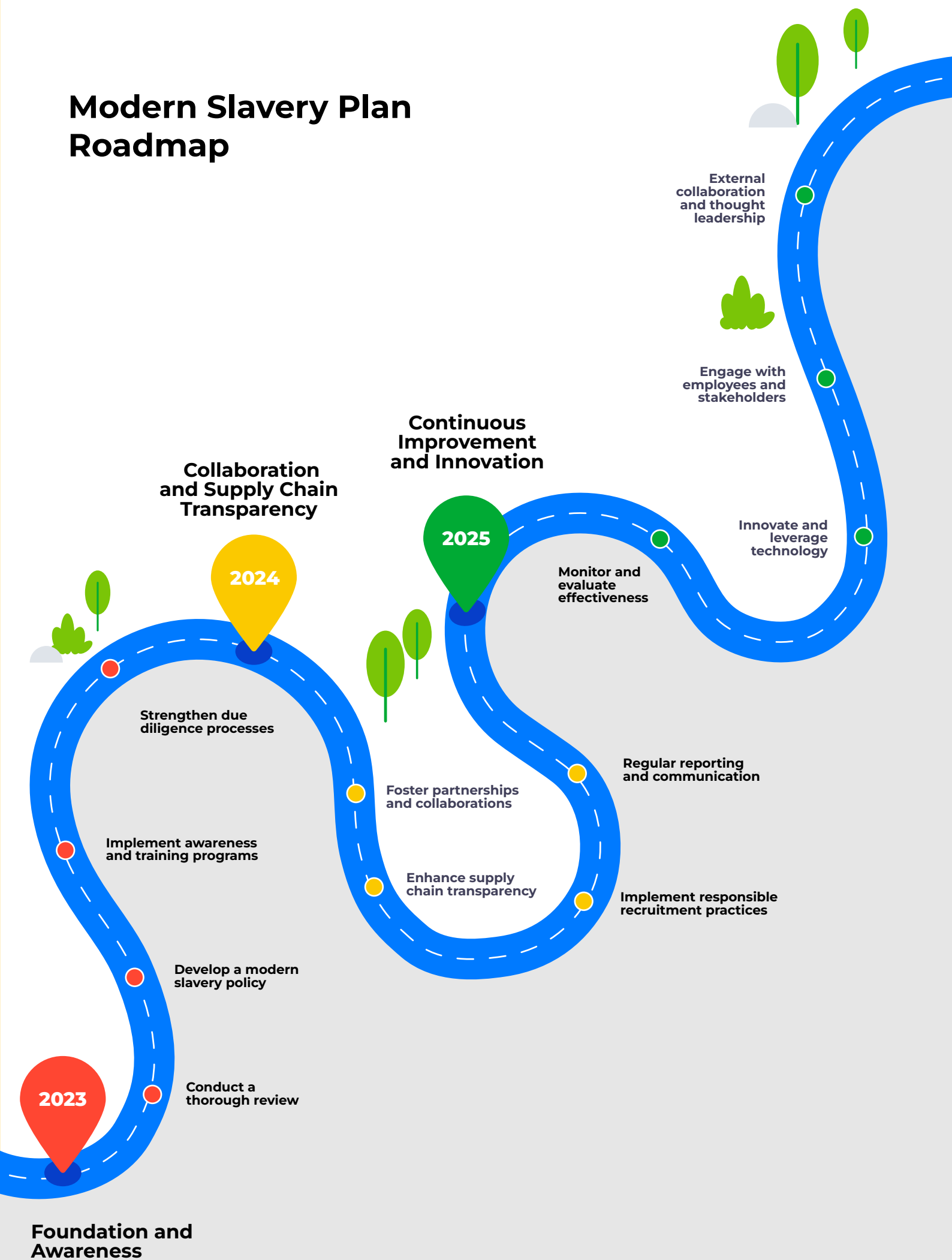
Policy Commitment

In all of our operations and supply chains, Cloudstaff Holdings Pty Ltd is committed to doing its part in stopping modern slavery and human trafficking. This includes a zero-tolerance policy on human trafficking, debt servitude, or forced labor of any kind.

Cloudstaff Holdings Pty Ltd has an obligation to make sure that our business practices prevent such violations and to work alongside our partners and suppliers to eliminate modern slavery within our supply chains.



Modern Slavery Plan Roadmap





2023 - 2025 Modern Slavery Plan

The objective of this plan is to enhance Cloudstaff Holdings Pty Ltd's responses to modern slavery by implementing comprehensive measures and initiatives over three years.

The plan focuses on prevention, detection, and response to modern slavery within Cloudstaff Holdings Pty Ltd's operations and supply chain.

2023

Foundation and Awareness

✔ Completed

✔ Conduct a thorough review

- a. Continue to assess the risk of modern slavery within Cloudstaff Holdings Pty Ltd operations and supply chain.
- b. Identify potential areas of vulnerability and high-risk activities.
- c. Continuously review existing policies, procedures, and supplier contracts for modern slavery prevention.
- d. Ensure compliance with relevant legislation, such as the Modern Slavery Act in Australia and other relevant jurisdictions.

✔ Develop a modern slavery policy

- a. Refine the comprehensive policy statement that reflects Cloudstaff Holdings Pty Ltd's commitment to combating modern slavery in all jurisdictions.
- b. Include definitions, principles, and guidelines for all employees, suppliers, and contractors.
- c. Ensure the policy aligns with international standards and best practices.

✔ Implement awareness and training

- a. Conduct ongoing mandatory training sessions for all employees to raise awareness about modern slavery.
- b. Provide specific training for employees involved in procurement, supply chain management, and recruitment.
- c. Develop training materials, including case studies and scenarios, to enhance understanding and identification of modern slavery indicators.

✔ Strengthen due diligence processes

- a. Enhance supplier onboarding procedures to include modern slavery risk assessments.
- b. Implement regular supplier audits to assess compliance with modern slavery prevention requirements.
- c. Develop a system to monitor suppliers' ongoing commitment to eradicating modern slavery.

2024

Collaboration and Supply Chain Transparency

✔ Completed

✔ Foster partnerships and collaborations

- a. Engage with industry organizations, NGOs, and other stakeholders to share best practices and knowledge.
- b. Collaborate with suppliers, contractors, and clients to promote a collective approach to combating modern slavery.

✔ Enhance supply chain transparency

- a. Develop a system to map Cloudstaff Holdings Pty Ltd's supply chain globally, identifying high-risk areas and potential vulnerabilities.
- b. Conduct risk assessments of suppliers and contractors, prioritizing those with high spend in high-risk regions or industries.
- c. Encourage suppliers to disclose their own efforts in combating modern slavery.

✔ Implement responsible recruitment practices

- a. Establish guidelines for fair and ethical recruitment processes globally, ensuring the protection of workers' rights in all jurisdictions.
- b. Implement due diligence procedures to verify the compliance of external recruitment agencies and subcontractors and internal recruiters.

✔ Regular reporting and communication

- a. Prepare and publish annual modern slavery statements for all jurisdictions detailing Cloudstaff Holdings Pty Ltd's actions and progress.
- b. Communicate with stakeholders, including employees, clients, and shareholders, to raise awareness and demonstrate commitment.

2025

Continuous Improvement and Innovation

✔ Completed

The 2025 phase marks the culmination of our three-year modern slavery plan. During this period, Cloudstaff has focused on measuring the effectiveness of its initiatives, leveraging technology to enhance oversight, and engaging both employees and external stakeholders to drive sustainable improvement across our operations and supply chain.

✔ Monitor and evaluate effectiveness

- a. Key performance indicators (KPIs) have been established to measure the effectiveness of modern slavery prevention initiatives.
- b. Annual performance reviews assess progress against each KPI, with results published in this statement and communicated to relevant stakeholders.
- c. Corrective actions identified through supplier risk assessments are tracked to resolution using a structured remediation framework.

✔ Innovate and leverage technology

- a. Cloudstaff has explored and implemented digital tools to enhance supply chain transparency, including an expanded supplier self-assessment questionnaire platform.
- b. Artificial intelligence and data analytics capabilities have been assessed to improve the identification of high-risk suppliers and labor arrangements.
- c. Digital onboarding workflows now integrate modern slavery risk flags at the point of supplier accreditation.

✔ Engage with employees and stakeholders

- a. Regular surveys and feedback sessions have been conducted with employees across all group entities to gather insights on the effectiveness of awareness programs.
- b. Staff engagement initiatives in 2025 included refresher training, internal webinars, and updated e-learning materials targeting high-risk roles.
- c. Employees across procurement, HR, and operations have been actively involved in refining due diligence procedures.

✔ External collaboration and thought leadership

- a. Cloudstaff has participated in industry forums and compliance working groups to share its experiences and learn from peers.
- b. Collaboration with NGOs, legal experts, and government bodies has continued, with a focus on practical implementation of anti-modern slavery standards.
- c. Active participation in public consultations relating to the review of the Modern Slavery Act 2018 and its practical application across multi-jurisdictional entities.

By completing this three-year plan, Cloudstaff Holdings Pty Ltd has strengthened its responses to modern slavery, promoted transparency, and created a culture of awareness and vigilance throughout its operations and supply chain.

The plan has helped Cloudstaff align with global best practices, meet legal obligations, and contribute to the global fight against modern slavery.



Message from the CEO and the Board

Cloudstaff Holdings Pty Ltd is committed to actively combating modern slavery and human trafficking in all aspects of our operations and supply chains. As an ethical and responsible company, we recognize the importance of ensuring that our activities do not contribute to these heinous offenses.

We firmly believe that it is our responsibility to work collaboratively with our partners and suppliers to eliminate modern slavery from our supply networks.

At Cloudstaff Holdings Pty Ltd, we have implemented robust processes to monitor and assess our vendors and suppliers. We have established clear objectives for incident reporting, employee and supplier training, as well as supplier audits.

The completion of our 2023–2025 Modern Slavery Plan represents a significant milestone in our journey. We are proud of the progress made across all three phases — from building our foundational policies and awareness programs in 2023, to deepening supply chain transparency in 2024, and driving continuous improvement and innovation throughout 2025. Our modern slavery response is now embedded in our governance, procurement, and human resources processes.

We are committed to regularly reviewing and evaluating the effectiveness of our policies, procedures, and modern slavery declaration. Should the need arise, we will revise this statement and ensure that our stakeholders, suppliers, and employees are promptly informed of any changes.

It is crucial to emphasize that eradicating modern slavery is not only an ethical imperative but also a sound business practice. Our clients rightfully expect us to operate in an ethical and responsible manner. By prioritizing our dedication to combating modern slavery, we can build trust and instill confidence among our stakeholders. Together, let us actively contribute to the fight against modern slavery and create a more just and equitable world.



Sincerely,
Lloyd Ernst

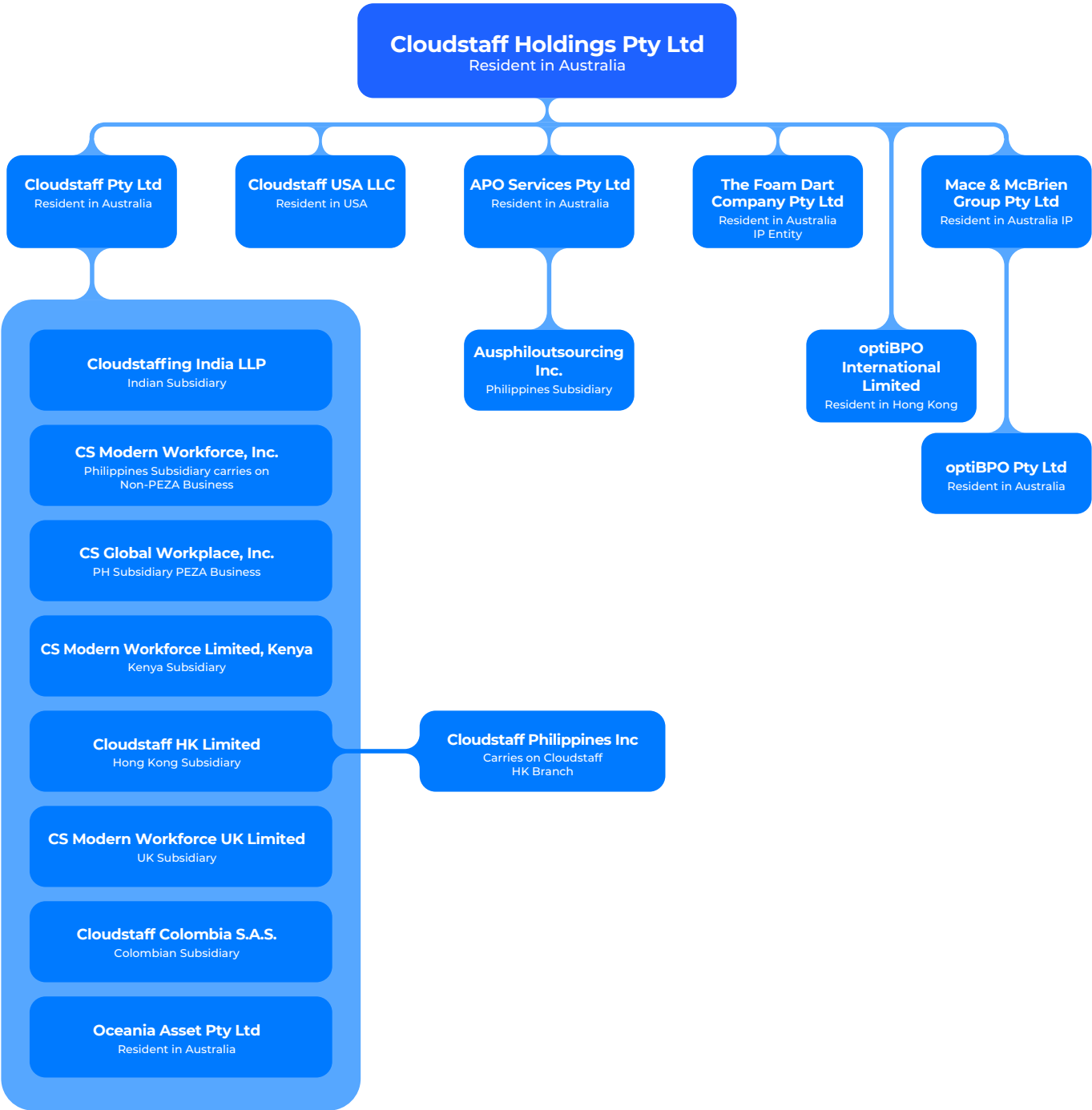


Reporting Criteria

Reporting Criteria 1 and 2

A structure diagram for Cloudstaff Holdings Pty Ltd and its subsidiaries has been provided below for ease of reference.

Organization Structure



Operations

Cloudstaff Holdings Pty Ltd is an outsourcing company operating across six countries. Our primary business is providing offshore staffing solutions to clients in Australia, the United States, and the United Kingdom, with delivery centers primarily based in the Philippines, India, and Colombia.

What We Do

Outsourcing Services

- » Real Estate
- » Accounting
- » IT Support
- » Collections
- » Software QA
- » eCommerce
- » Development
- » Back Office
- » Other industries

Services Offered

- » Hiring staff members for clients
- » Productivity and management tools
- » Office workspaces
- » Workstations
- » Software
- » Connectivity
- » Security
- » Business continuity
- » Account managers
- » Success managers
- » Collections

Internal Hub Services

- » Recruitment
- » Sales
- » Account management
- » Human resources
- » Information technology
- » Network
- » Facilities
- » Other internal services

Where We Do It



Australia



United States



United Kingdom



Philippines



India



Colombia

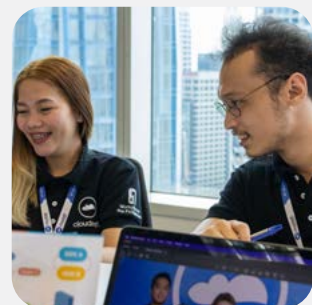
How We Manage Modern Slavery Risks



Modern Slavery Group



Education and training of staff and suppliers



Supplier survey and risk identification

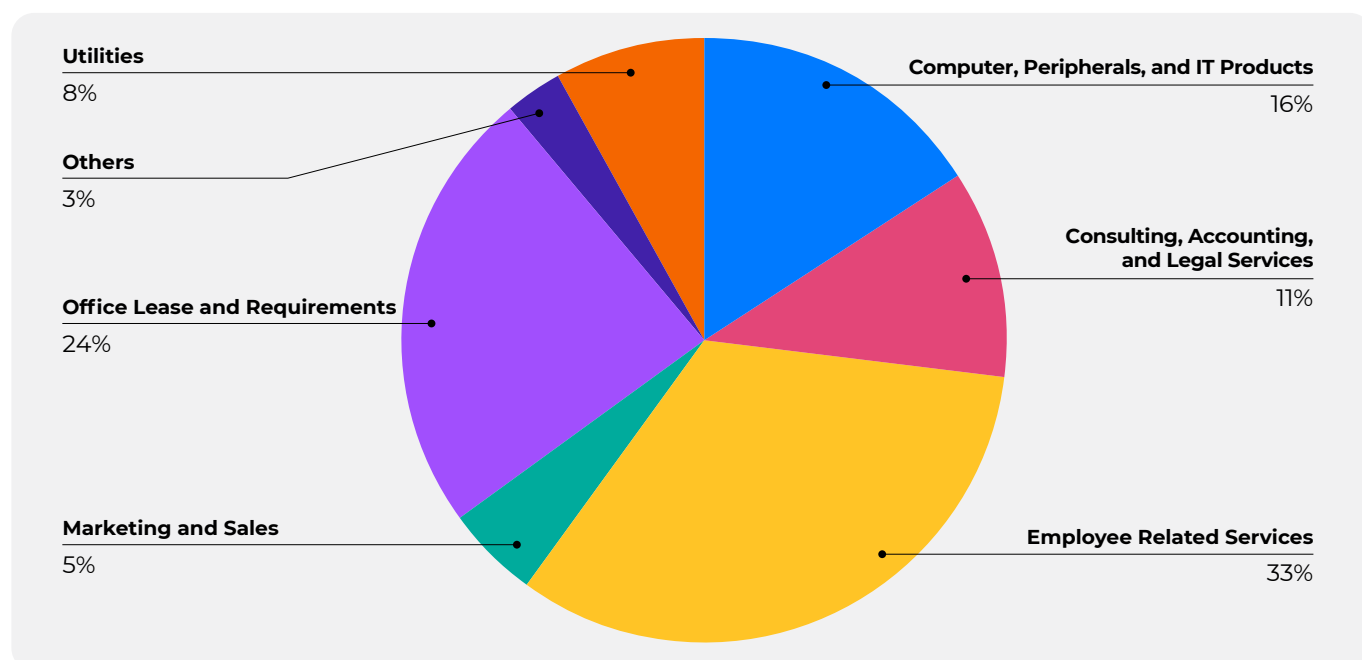
Our Supply Chain

As Cloudstaff Holdings Pty Ltd is an outsourcing company, our direct supply chain consists primarily of:

- » Computer, Peripherals and IT Products
- » Office Lease and Requirements
- » Employee Related Services
- » Consulting, Accounting, and Legal Services
- » Marketing and Sales
- » Utilities
- » Others

In 2025, Cloudstaff Holdings Pty Ltd had over 500 transacted suppliers to support our operations and had total expenditure of more than \$36 Million AUD. Cloudstaff Holdings Pty Ltd has established long-term relationships with our suppliers, the majority of which are located in the Philippines.

Cloudstaff Holdings Pty Ltd Expenditure for 2025



Reporting Criteria 3

Modern Slavery Risk in Operation and Supply Chain

Operational Risk

As a responsible business, Cloudstaff Holdings Pty Ltd understands the significance of recognizing and minimizing operational risks, including the risk of modern slavery. Due to our policies and practices that support ethical hiring procedures, competitive pay, the prevention of harassment, bullying, and discrimination, and the provision of a workplace free from such practices, Cloudstaff Holdings Pty Ltd considers that its business operations have a very low risk of exposure to modern slavery.

Promoting Fair Employment Policies:

Cloudstaff Holdings Pty Ltd ensures that all operations in all jurisdictions adhere to fair employment policies and that new recruits are selected based on their credentials, expertise, and experience.

Fair and Competitive Pay:

Cloudstaff Holdings Pty Ltd is committed to providing its staff with fair and competitive wages appropriate for their education, training, and experience, reviewed regularly to maintain market parity.

Providing a Safe Workplace:

All employees receive mandatory OSH (Occupational Health and Safety) training and operate in environments designed to prevent workplace accidents and injuries.

Preventing Harassment, Bullying, and Discrimination:

Cloudstaff Holdings Pty Ltd maintains a zero-tolerance approach to harassment, bullying, and discrimination, ensuring each employee is treated with respect and dignity.

Building Sustainable Communities:

Cloudstaff is dedicated to fostering local economic growth and community development by creating jobs and business opportunities locally across all jurisdictions of operation.

Risk Reduction:

Cloudstaff actively works to reduce the possibility of modern slavery in its operations and supply chain through vulnerability identification, monitoring of labor hire arrangements, and rigorous due diligence.

Enhancing Data Insights:

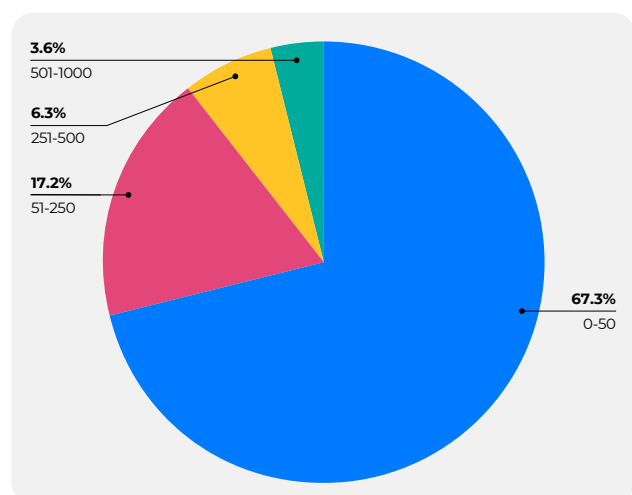
Cloudstaff is committed to improving its data insights to more accurately gauge the efficacy of its current modern slavery risk methodology.

There are some potentially vulnerable areas in our operations, including the employment of labor-hire contractors and outsourced services such as catering, security, and facilities management. Whilst the possibility of Cloudstaff contributing to modern slavery is assessed as low, we remain vigilant and continue to strengthen our controls in these areas.

Supply Chain Risk

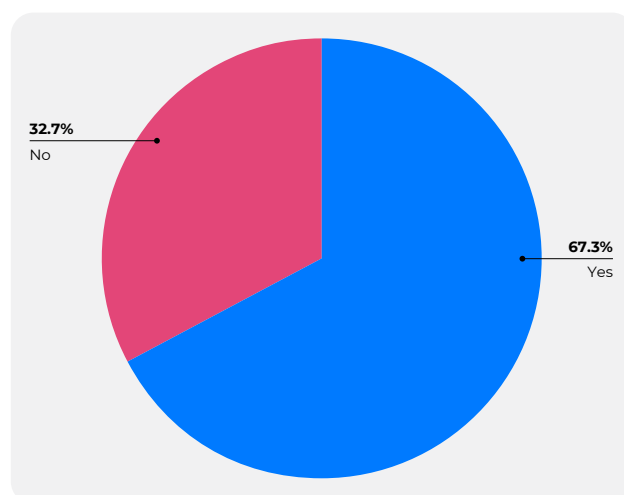
We conduct a risk assessment of our suppliers as part of our efforts to combat modern slavery. In 2025, we surveyed 303 suppliers — representing a significant increase from prior years — and the results are as follows:

Supplier employee distribution



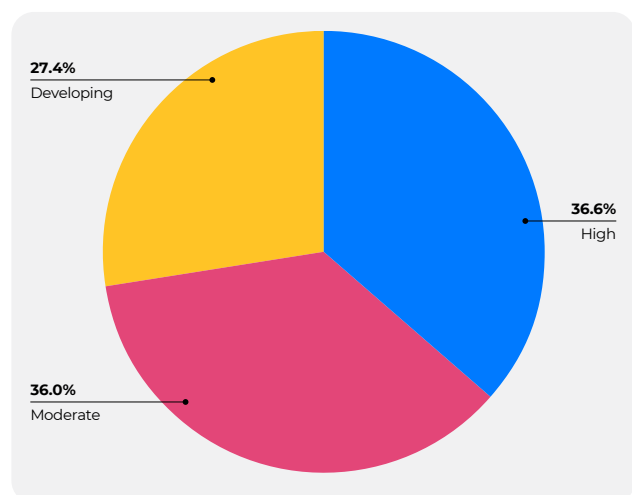
In line with our commitment to ethical workplace practices, we conducted a survey on modern slavery awareness with our vendors. The results indicate that 67.3% of employees work in teams of 50 or fewer, while only 5.6% are in teams exceeding 1,000. Other groupings include 51–250 (17.2%), 251–500 (6.3%), and 501–1,000 (3.6%). Compared to previous data, smaller teams grew in proportion, while mid-sized and large teams saw slight declines.

Supplier Background Checks



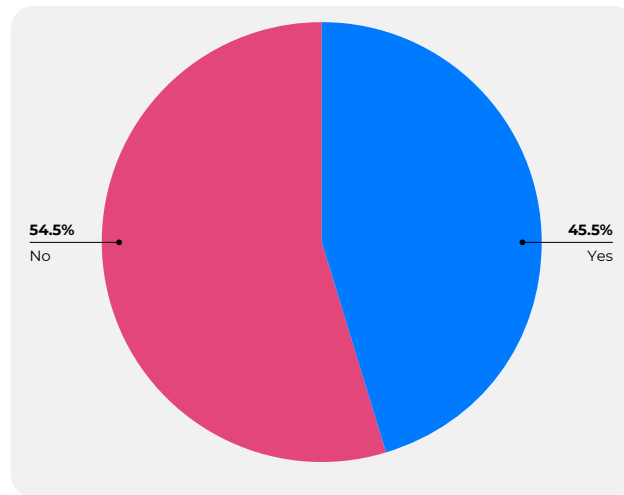
Survey data indicates that 67.3% of respondents conduct background checks on their suppliers to ensure they are not involved in modern slavery, while 32.7% do not. To support the organizations that currently lack these measures, we will provide additional resources and training to help them strengthen their supplier screening processes.

Supply Chain Visibility



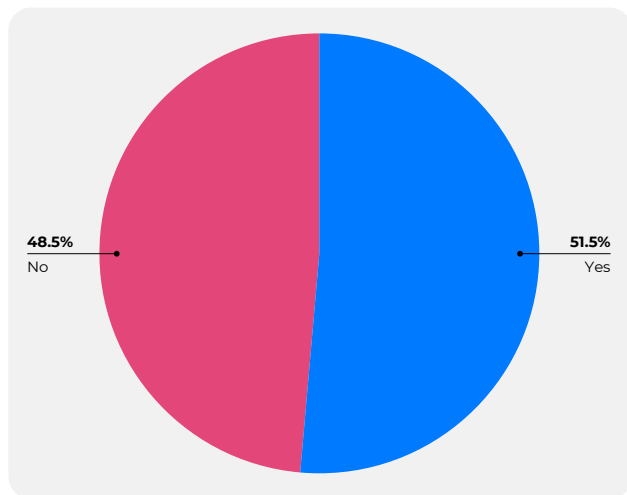
Our survey revealed that 36.6% of respondents have high visibility into their supply chain, 36.0% have moderate visibility, and 27.4% are still developing it. Compared to the previous reporting period, high visibility has decreased slightly from 40.96%, suggesting that the expanded supplier pool includes more organizations at earlier stages of supply chain mapping. To mitigate risks such as modern slavery, we will continue to enhance visibility through improved tracking and monitoring, particularly in developing areas.

Supplier Implementation of Modern Slavery Prevention Policies and Procedures



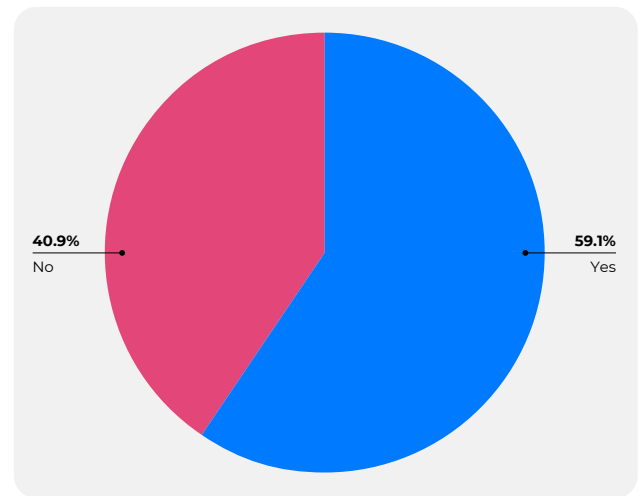
Our survey shows that 45.5% of respondents have policies in place to prevent modern slavery within their organization and supply chain, an increase from 43.0% in the prior period. While this indicates progress, more than half of suppliers still lack formal policies. We will continue supporting organizations by sharing best practices, offering policy guidance, and providing training.

Due Diligence Activities



Our survey shows that 51.5% of respondents conduct additional due diligence to address modern slavery risks, an increase from 48.12% in the prior period. This indicates a positive trend in proactive risk management. We will continue to provide guidance and examples of effective due diligence practices.

Training on Modern Slavery Risk and Prevention



A total of 59.1% of respondents offer training on modern slavery risks for employees and suppliers, up from 55.63% in the prior period. This improvement reflects growing awareness initiatives. We will develop and deliver further training programs to help organizations strengthen their commitment to preventing modern slavery.

Termination of Violators

Our survey shows that 13.9% of respondents have terminated a supplier due to modern slavery concerns, compared to 15.36% in the prior reporting period. No supplier relationships within the Cloudstaff Holdings Pty Ltd portfolio were terminated due to modern slavery concerns during the 2025 reporting period, as no instances of such violations were identified across our directly managed supply chain.

We will continue to engage with organizations to understand supplier termination policies and escalation processes, helping establish more effective approaches for addressing modern slavery risks within the broader supply ecosystem.

Reporting Criteria 4

Actions Taken to Assess and Address Risk

Since 2022, Cloudstaff Holdings Pty Ltd has systematically developed and implemented its modern slavery prevention framework. The following activities and steps have been undertaken:

- » Creation of the Modern Slavery Working Group now called our Ethics Committee and identification of responsibilities across all group entities.
- » Provision of training and awareness to staff and suppliers on modern slavery risks, indicators, and reporting obligations.
- » Annual audits and evaluations of suppliers to assess compliance with modern slavery prevention requirements.
- » Implementation of anti-modern slavery and human rights policy across Cloudstaff Holdings Pty Ltd and all controlled entities.

Training and Awareness

We believe that the best way to stop human trafficking and modern slavery is through education and awareness. We regularly train our staff members, vendors, and contractors on this subject matter as well as our standards and guidelines.

All staff members are encouraged to identify any concerns or suspicions they may have relating to the likelihood of modern slavery occurring within our business or supply chains. Key training activities undertaken in 2025 include:

- » 100% of new incoming staff completed mandatory modern slavery awareness training as part of their onboarding program.
- » Bespoke training modules were delivered to high-risk departments including HR, procurement, sales, and recruitment teams.
- » Refresher training sessions were conducted for existing staff across all group entities.
- » Updated e-learning content was deployed to reflect developments in the regulatory landscape and emerging risk indicators.

Supplier Survey and Risk Identification (Key Performance Indicators)

We are dedicated to keeping records on and assessing the success of our efforts to prevent modern slavery. For incident reporting, employee and supplier training, and supplier audits, we have set measurable targets.

In 2025, our actions are centered on the final phase of our three-year plan: continuous improvement and innovation. We have leveraged insights from our most recent surveys and supplier risk assessments to address gaps identified in prior years, particularly around supply chain visibility and supplier-led compliance initiatives.

This year, we have also advanced the systematic implementation of modern slavery controls across all group entities, ensuring that every entity we own or control has established robust, scalable policies and due diligence procedures that proactively mitigate modern slavery risks and respond to emerging compliance standards.

Reporting Criteria 5

Review and Evaluation

Our modern slavery statement along with the effectiveness of our policies and procedures, will be reviewed and evaluated on an annual basis. We will revise this statement if necessary and let our stakeholders, suppliers, and staff members know about any changes.

Cloudstaff is committed to continuous improvement in the identification, prevention, and mitigation of modern slavery risks across our operations and supply chains. The following roadmap outlines the key initiatives undertaken in 2023, 2024, and 2025, reflecting our progress and proactive measures aligned with our corporate values and obligations under the Modern Slavery Act 2018 (Cth).

2025 Achievements – Continuous Improvement and Innovation

Initiative	Achievements
Monitor and evaluate effectiveness	KPIs were formally established and tracked for the first time in 2025. Annual performance reviews were conducted across all key metrics, with results incorporated into this statement and shared with the Modern Slavery Steering Committee.
Innovate and leverage technology	A fully digital supplier self-assessment questionnaire was deployed across the entire supplier base. Integration with risk-flagging tools has improved identification of high-risk suppliers at the point of onboarding.
Engage with employees and stakeholders	Internal surveys gathered employee insights on awareness program effectiveness. Refresher training was deployed globally, achieving full completion among target staff populations in procurement and HR.
External collaboration and thought leadership	Cloudstaff participated in industry working groups and contributed to public consultations on the review of the Modern Slavery Act 2018 (Cth). Partnerships with NGOs and legal experts were maintained.
ESG integration	Modern slavery risk management has been integrated into Cloudstaff's broader ESG framework, with supplier ESG questionnaire data informing our human rights risk assessments for the first time.
Annual modern slavery statement	The 2025 Modern Slavery Statement was prepared and submitted in line with all legislative requirements. It includes year-over-year progress, updated KPIs, and commitments for the next reporting period.

2024 Achievements – Collaboration and Supply Chain Transparency

Initiative	Achievements
Foster partnerships and collaborations	Cloudstaff collaborated with key suppliers and internal teams to promote shared understanding and practical approaches to addressing modern slavery risks.
Collaborate with suppliers and clients	Cloudstaff collaborates with suppliers through regular surveys on modern slavery practices and engages with clients as needed to support their compliance inquiries.
Enhance supply chain transparency	A phased rollout of a supply chain mapping system began, with initial mapping focusing on Tier 1 and 2 suppliers. Cloudstaff identified region and sector-specific vulnerabilities using 2024 survey data.
Risk assessments of key suppliers	A corrective action procedure for suppliers is currently being developed to support remediation efforts based on the findings from ongoing risk assessments.
Encourage supplier disclosure	A modern slavery self-assessment questionnaire was issued to all suppliers, capturing data on their policies, training, and remediation mechanisms.
Implement responsible recruitment practices	Cloudstaff is developing clear recruitment guidelines to support fair hiring and protect worker rights across all regions.
Agency and subcontractor vetting	Cloudstaff introduced a vetting checklist for recruitment partners. This includes documentation reviews, policy validation, and, where necessary, site verification.
Annual modern slavery statement	The 2024 Modern Slavery Statement was prepared and submitted in line with all legislative requirements. It includes year-over-year progress and future targets.
Stakeholder communication	Anti-modern slavery training videos and sessions are included in new hire orientations, with annual refresher programs currently in development for all staff.

2023 Achievements – Foundation and Awareness

Initiative	Achievements
Conduct a thorough review	A comprehensive risk assessment was completed across Cloudstaff's operations and supplier ecosystem. High-risk areas such as outsourced services and labor-hire arrangements were identified, with tailored mitigation strategies implemented.
Identify high-risk activities	Risk mapping highlighted categories such as security, facilities management, and third-party recruiters as potential exposure points. These were prioritized for further due diligence.
Review internal policies & contracts	Internal policies and supplier contracts were reviewed and updated to include modern slavery compliance clauses and reporting requirements in line with Australian and international standards.
Ensure legislative compliance	Legal, HR, and procurement teams worked collaboratively to ensure full alignment with the Australian Act and equivalent legislation in operational regions.
Develop a modern slavery policy	A standalone Modern Slavery Document was published, outlining Cloudstaff's position, expectations of suppliers, and response protocols. This document was distributed across all group entities.
Embed definitions and guidelines	Definitions of modern slavery and guidelines for reporting were embedded into employee handbooks, supplier onboarding kits, and training materials.
Training and awareness programs	Mandatory training was completed by 100% of incoming staff.
Train high-risk departments	Bespoke training were developed for HR, sales, and recruitment teams. These covered vetting procedures, interview practices, and due diligence obligations.
Develop training content	Cloudstaff internal videos, and quick-reference guides were launched to support continuous learning.
Improve supplier onboarding	Modern slavery declarations and background checks became part of the accreditation workflow. Suppliers are now ranked by risk profile.
Implement supplier audits	Cloudstaff conducts an annual review and survey of its suppliers to assess their anti-modern slavery practices, compliance status, and overall risk exposure. The results inform our engagement strategy and continuous improvement of due diligence procedures.
Monitor supplier engagement	Supplier progress is reviewed annually through surveys, allowing us to assess both new and existing suppliers' commitment to modern slavery prevention.

Reporting Criteria 6

Consultation Process

Cloudstaff Holdings Pty Ltd adopted a collaborative approach to preparing and drafting this Statement. The Modern Slavery Working Group convened monthly to address various aspects of modern slavery initiatives, track progress by the Operating Groups and the Modern Slavery Steering Committee, and compile this Statement.

The Procurement, HR, and Legal teams engage with the relevant Operating Groups and reporting entities (listed in Annexure A) on modern slavery issues. Their engagement includes providing updates on regulatory changes and trends related to modern slavery, explaining Cloudstaff's reporting approach, and reviewing and approving the annual statement. Additionally, the board is regularly updated on the relevant Act and its requirements.

To ensure thorough consultation with all entities that Cloudstaff owns or controls, the following process is in place:

Regular Meetings:

The Modern Slavery Working Group holds monthly meetings that include representatives from all owned or controlled entities. These meetings serve as a platform for discussing ongoing initiatives, sharing progress updates, and addressing any concerns related to modern slavery.

Stakeholder Engagement:

The Procurement, HR, and Legal teams maintain regular communication with the relevant Operating Groups and reporting entities. This includes organizing workshops and training sessions to raise awareness about modern slavery risks and compliance requirements.

Reporting and Feedback Mechanism:

Each owned or controlled entity is required to provide regular reports on their modern slavery risk management activities. These reports are reviewed by the Modern Slavery Steering Committee to ensure alignment with Cloudstaff's overall strategy and to identify areas for improvement.

Annual Reviews:

An annual review process is conducted to assess the effectiveness of modern slavery policies and procedures across all entities. This involves collecting feedback from key stakeholders, including employees, suppliers, and external partners, to identify any gaps or areas for enhancement.

Board Updates:

The board of each reporting entity is regularly updated on modern slavery regulatory updates and trends, Cloudstaff's approach to modern slavery reporting, and the annual statement for review and approval.

By implementing this comprehensive consultation process, Cloudstaff Holdings Pty Ltd ensures that all entities it owns or controls are actively involved in addressing modern slavery risks and contributing to the overall effectiveness of its modern slavery initiatives.

Looking Ahead: 2026 and Beyond

The completion of Cloudstaff's 2023–2025 Modern Slavery Plan is not an endpoint, it is a foundation. Three years of deliberate, structured effort have built something durable: a compliance culture anchored in genuine accountability, a supplier base that is increasingly transparent, and an organisation-wide understanding that the fight against modern slavery is inseparable from the way we do business. As we move into 2026 and beyond, that foundation becomes the platform from which we will go further.

Sustained Vigilance, Not Periodic Compliance

Modern slavery does not observe reporting cycles. It adapts, shifts, and exploits gaps wherever they exist — in recruitment pipelines, in fragmented supply chains, in the spaces between oversight. Cloudstaff's commitment from 2026 onwards is to match that persistence with its own: a standing programme of monitoring, review, and action that treats modern slavery prevention as an enduring operational responsibility, not an annual exercise.

What We Will Continue to Do

- » **Annual Modern Slavery Statements.**
Cloudstaff will continue to prepare and publish annual statements in full compliance with the Modern Slavery Act 2018 (Cth) and equivalent legislation across our operating jurisdictions. Each statement will reflect honest, evidence-based progress, reporting not only achievements, but areas where further improvement is required.
- » **Ongoing Supplier Monitoring and Engagement.**
The annual supplier survey programme will be maintained and refined. As our supplier base evolves, so too will our assessment tools, with a growing emphasis on ESG integration, corrective action tracking, and tiered engagement for higher-risk relationships.
- » **Policy Review and Continuous Improvement.**
All modern slavery-related policies, procedures, and due diligence frameworks will be reviewed annually by the Modern Slavery Working Group. Updates will be communicated promptly across all group entities and incorporated into training and onboarding materials.
- » **Training That Keeps Pace with Risk.**
Mandatory training for incoming staff and refresher programs for existing employees will continue across all jurisdictions. Training content will be updated to reflect new risk intelligence, legislative developments, and lessons drawn from our supplier assessments.
- » **Governance and Board Accountability.**
The Modern Slavery Steering Committee will continue to provide regular updates to the boards of all reporting entities. Modern slavery risk will remain a standing agenda item, ensuring leadership visibility and organisational accountability at the highest level.

Progress in this space demands more than intention, it demands systems, scrutiny, and the willingness to act when those systems reveal something uncomfortable. Cloudstaff has built that capacity.

Going forward, we will use it. We will continue to measure what we do, report what we find, and hold ourselves to a standard that reflects not only the letter of the law but the spirit behind it: that every person, in every part of our operations and our supply chain, deserves to work in conditions of dignity, safety, and freedom.

Conclusion and Contact Information

In all of our operations and supply chains, Cloudstaff Holdings Pty Ltd is committed to doing what it can to identify and combat modern slavery. We acknowledge that this is a never-ending process and a continuous improvement journey for our organization.

The completion of our 2023–2025 Modern Slavery Plan marks a significant milestone — one which we will build upon as we design our next phase of initiatives for the years ahead.

We remain committed to transparency, accountability, and the highest standards of ethical business conduct. We will continue to engage our suppliers, employees, clients, and stakeholders in this important effort.

If you have any queries, feedback, or wish to report any suspected cases of modern slavery, please don't hesitate to reach out to us at legal@cloudstaff.com.

Annexure A

Cloudstaff Holdings Pty Ltd	ACN 613 909 809
Cloudstaff Pty Limited	ACN 107 400 699
Cloudstaff USA LLC	EIN 38-41936189
APO Services Pty Ltd	ACN 615 344 673
The Foam Dart Company Pty Ltd	ACN 624 958 345
Mace & McBrien Group Pty Limited	ACN 145 249 127
optiBPO International Limited	CN 2551701
Cloudstaffing India LLP	LLP Identification No. ABB-5650
CS Modern Workforce, Inc.	SEC Reg. No. CS201818387
CS Global Workplace, Inc.	SEC Reg. No. 2021120036511-00
CS Modern Workforce Limited, Kenya	Company Reg. No. PVT-L51D2J83
Cloudstaff HK Limited	CN 2084927
CS Modern Workforce UK Limited	CN 13597318
Cloudstaff Colombia SAS	NIT 901697264
Oceania Asset Pty Ltd	ACN 095 878 032
Cloudstaff Philippines Inc.	SEC Reg. No. FS201422144
Ausphiloutsourcing Inc.	SEC Reg. No. CS201721115
optiBPO Pty Ltd	ACN 600 126 056

Modern Slavery Act 2018 (CTH) Statement Annexure

Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of Cloudstaff Holdings Pty Ltd as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 25 May 2026.

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of Cloudstaff Holdings Pty Ltd. as defined by the Act2.



Lloyd Ernst

Mandatory criteria

a. Identify the reporting entity.	15
b. Describe the reporting entity’s structure, operations and supply chains.	15-17
c. Describe the risks of modern slavery practices in operations and supply chains.	18-20
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.	21
e. Describe how the reporting entity assesses the effectiveness of these actions.	22-24
f. Describe the process of consultation with entities the reporting entity owns or controls.	25
g. Any other relevant information.	26-28



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