



Modern Slavery Statement [DRAFT]

01 July 2025 – 28 May 2026



This Modern Slavery Statement (**Statement**) is made on behalf Trivity Pty Limited (ABN 62 691 322 095) referred to as "Trivity", "we", "us" and "our").

Introduction

Trivity recognises that modern slavery includes trafficking in persons, slavery, slavery-like practices (including forced labour, forced marriage and debt bondage) and the worst forms of child labour, and that modern slavery can occur in any country, sector, or industry. Trivity opposes modern slavery in all its forms and does not tolerate any forms of slavery or human trafficking in our business or our supply chains.

Reporting Period 2025 – 28 May 2026

This is the first Modern Slavery Statement (**Statement**) for Trivity under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). As Trivity was founded in September 2025 and formally registered on the Australian Business Register on 25 September 2025, this Statement covers the reporting period 1 July 2025 to 28 May 2026 and was approved by the Trivity Directors on 28 May 2026.

Over the course of the current reporting period, Trivity experienced no actual or suspected cases of modern slavery in our operations or supply chains.

Purpose

The purpose of this Statement is to outline Trivity's ongoing commitment to identifying and understanding the risks of modern slavery and human trafficking in our operations and supply chain. The Statement also reports on the initial steps we have taken to implement frameworks and processes to minimise these risks.

Through the measures we take we hope to continue to contribute to a global reduction in modern slavery and human trafficking.

About Trivity

Trivity is a privately owned, wholly Australian technology company delivering risk-assured, secure, and scalable Artificial Intelligence (**AI**) and automation solutions for the Commonwealth Government. Built specifically for Commonwealth assurance frameworks and with sovereign hosting and alignment to Australia's AI Ethics Principles, our solutions streamline agency workflows, enhance decision-making, and ensure legal and operational integrity.

Trivity uses a mix of onshore employees and contractors, and offshore contractors (located in the Philippines) to develop and commercialise its digital solutions.

Further information about Trivity can be found on our website <https://www.trivity.com.au>.

Trivity's operations and supply chains

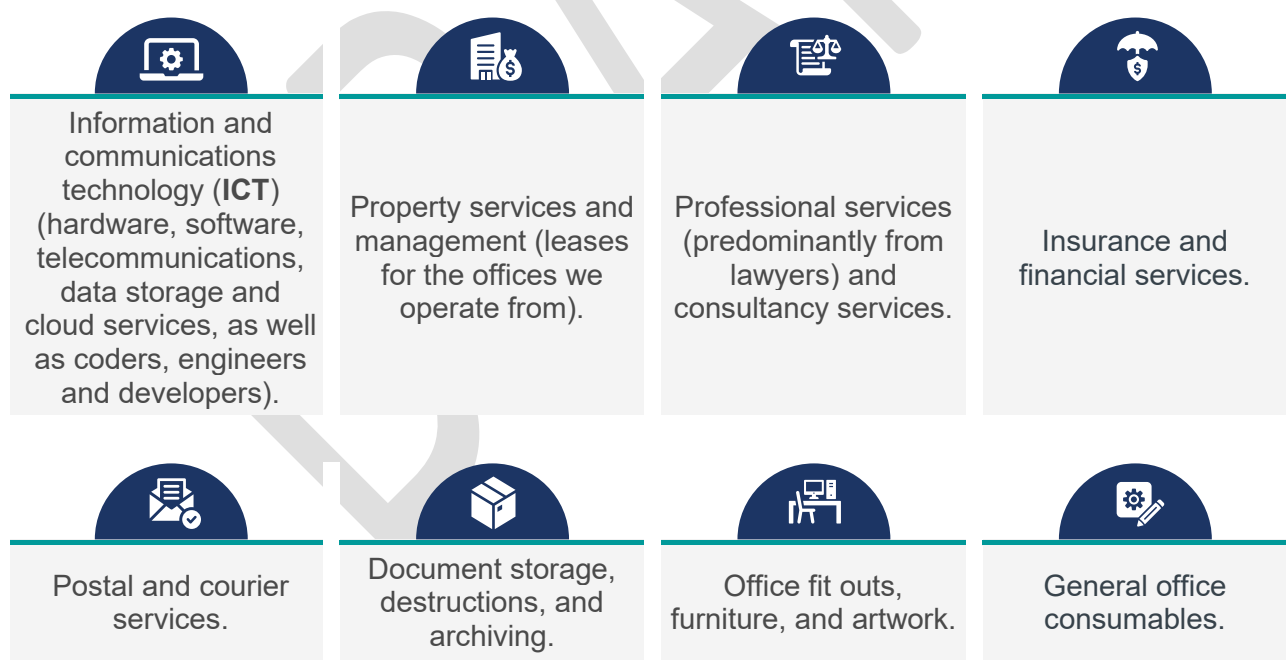
Trivity is committed to:

-  the highest standards of professionalism, ethical behaviour and integrity, and
-  ensuring that our operations and supply chains are free from modern slavery and human trafficking.

We have a zero-tolerance approach to all human rights abuses, and our approach is guided by respect for human rights and fair labour practices in every country where we operate.

As a Sydney-based technology company focused on designing and delivering bespoke technology solutions for the Commonwealth Government, Trivity predominantly employs professionally qualified and highly skilled people including information technology (IT) experts, engineers, lawyers and businesspeople. We comply, to the highest standards, with all Australian employment and workplace-related laws.

Our supply chain primarily consists of the following goods and services we procure to assist us to deliver our services.



We use only reputable suppliers, most of which are based in Australia and subject to Australian law. Our international suppliers are a mix of large, leading global brands that primarily support Trivity with ICT and insurance, and operate in jurisdictions that have at least equivalent anti-slavery and human trafficking laws to Australia. We ensure that the offshore human resources we engage to deliver ICT services (coders, engineers and developers) are paid the appropriate minimum wage within their country of tax residency.

Trivity's ethical framework

Trivity is committed to the highest standards of ethics and integrity, and our approach to modern slavery risks is consistent with that approach. We recognise that our reputation rests on how we conduct ourselves individually and collectively as a business. We are developing a suite of policies that reinforce how we do business in the right way, including:



Modern Slavery risks

We have assessed that our supply chains and operations are low risk of involving modern slavery, with very few areas having the potential for modern slavery activities, including through our direct suppliers.

We have acknowledged that continual vigilance and continuous improvement of our own supply chain risk identification and assessment processes remains pivotal in combatting modern slavery.

Actions taken to assess and address modern slavery risks

We constantly review our supply chains, policies, and procurement practices. No specific risks have been identified as requiring mitigation or remediation.

In our next reporting period, we intend to review our due diligence and supplier assessment processes to ensure that we continue to identify risks associated with third party suppliers. If risks are identified, we will develop strategies to mitigate or remediate those risks, including where necessary to terminate arrangements with non-compliant suppliers.

Assessing the effectiveness of action taken

We continue to review our processes to ensure that we are adequately identifying and addressing operating and supply chain risks, and we continue to monitor broader developments relating to modern slavery risks.

We remain confident that our processes are robust and that there is no modern slavery present in our supply chains.

While to date no modern slavery risks have been identified, should any be identified in the future these are to be escalated to our Executive Chair, **Dr Kylie de Boer**. Kylie will respond to the identified risk by developing a mitigation and/or management plan considering the specific context and circumstances and, where appropriate.

Consultation

This Statement has been prepared following consultation with Trivity's operation leadership team, including **Kylie De Boer**, **Karwan Eskerie**, **Lambros Photios** and **Caitlin Catalano**.

Future actions

Over the next reporting period, we will be taking steps to monitor our supply chain risk identification and assessment processes, including:



identifying training options to improve and embed understanding within our business about what modern slavery entails, its forms and how to flag risks



continuing to ask suppliers about potential modern slavery risks in their supply chains, and seeking to include contractual obligations suppliers commit to respecting and supporting international human rights and comply with obligations regarding modern slavery



reviewing recently published Modern Slavery Statements of our Australian-based suppliers and equivalent statements of our overseas suppliers



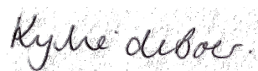
developing training programs for our people engaged in procurement to increase awareness of modern slavery risks in our supply chains, and



maintaining a register of any modern slavery risks identified within our supply chain.

Director approval

The Directors of Trivity approved this statement on 28 May 2026.



Signed by

Dr Kylie de Boer, Executive Chair

Trivity Pty Limited | www.trivity.com.au

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