

MODERN SLAVERY STATEMENT 2025



This is Count Limited's (Count) second Modern Slavery Statement under the Australian Modern Slavery Act 2018 (Cth). At Count, we are committed to upholding the highest standards of ethical conduct and human rights. We recognise that modern slavery including forced labour, human trafficking, and other forms of exploitation is a serious violation of fundamental rights and a global challenge requiring ongoing vigilance.

Building on the foundational work completed in our first reporting year, we have continued to strengthen our processes to identify, assess, and mitigate modern slavery risks within our operations and supply chains. While we acknowledge that we are still early in this journey, we remain focused on continuous improvement and transparency in our approach.

About this statement

This statement discloses the actions taken by Count to date to address the risks of modern slavery, forced labour and human trafficking in our business and value chain for the 2025 calendar year. This statement is prepared to comply with the requirements of the *Australian Modern Slavery Act 2018 (Cth)* (**Act**).

The Count Modern Slavery Statement was approved by the Count Limited Board on 4 December 2025.



Hugh Humphrey

CEO and Managing Director

Count Limited

4 December 2025

Our business

Count is an ASX-listed professional services group headquartered in Sydney, Australia. We operate nationally through three core segments: Equity Partnerships, Wealth, and Services.

Equity Partnerships

We hold ownership interests (typically 20%–100%) in small and medium sized accounting and financial services firms across Australia. These firms provide accounting, audit and assurance, taxation, financial planning, and business advisory services. Each firm operates under its own management and premises.

Wealth

This segment includes Australian financial services licensees that support and supervise financial advisers across the country, ensuring compliance and professional standards.

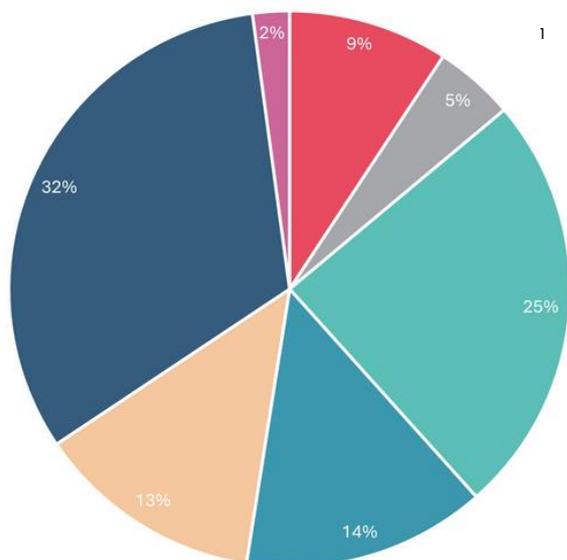
Services

Our complementary businesses provide actuarial certificates, education and training, outsourcing solutions, and technology services to accounting and advice professionals.

The Count corporate office oversees governance and performance across all segments. Central functions include Finance, Legal, Risk and Governance, People and Culture, Operations, Marketing, Mergers and Acquisitions and the Office of the CEO.

Supply chain structure

Supplier spend %



Count spent approximately \$ 46.36m in the FY 2025 on external goods and services with majority of these services in IT and Communications and Professional Services.

- Banking and Finance
- Human resources
- IT and communication costs
- Other administrative costs
- Premises costs
- Professional services
- Regulatory & compliance

Payments by supplier type	FY 2025
Professional Services	32%
IT and Communications	25%
Other administrative costs ²	14%
Premises	13%
Banking and Finance	9%
Human Resources	5%
Regulatory and Compliance	2%

¹ External spend is total external payments, exclusive of GST for FY2025. Payments relating to income and other taxes, and amounts paid for salaries and related on costs have been excluded. No accounting adjustments have been applied to these figures.

² Other administrative costs include sales and marketing, conferences, travel, accommodation, office supplies and property, plant and equipment acquisitions

Our FY2025 supplier spend profile provides useful context for assessing modern slavery risks:

Professional Services (32%)

This category primarily involves Australian-based legal, accounting, and consulting firms, which are considered low-risk for modern slavery due to strong regulatory frameworks and professional standards.

IT and Communications (25%)

This is a key area of potential risk. While many providers are large, reputable companies, technology hardware and offshore IT support services can involve supply chains in higher-risk jurisdictions. We continue to apply due diligence and require compliance with our Supplier Code of Conduct.

Other Administrative Costs (14%) and Premises (13%)

This includes travel and entertainment expenses, property, plant and equipment (PPE) acquisitions, office consumables, cleaning services, and property maintenance. These categories can present modern slavery risks, particularly where subcontracting or low-skilled labour is involved, such as in cleaning and property services or in supply chains for consumables and PPE.

Banking and Finance (9%) & Regulatory and Compliance (2%)

These services are generally low risk due to strong governance and regulatory oversight in Australia.

Human Resources (5%)

Outsourced recruitment or payroll services may involve offshore processing. We review these arrangements to ensure compliance with ethical labour standards.

Equity Partnerships and Services Businesses

The Equity Partnerships and Services businesses are responsible for their own procurement activities. Through its ownership and reporting structures, Count has visibility into the majority of their expenditure, enabling oversight and alignment with our modern slavery risk framework.

Overall Assessment of Supplier Spend

Our supplier spend is concentrated in professional and regulated services, which are generally low risk. However, IT hardware, offshore support, and property services remain areas of heightened attention. We continue to strengthen supplier due diligence and require adherence to our modern slavery framework.

Our approach and actions to assess and address modern slavery risks

This is Count Limited's second year reporting under the Modern Slavery Act 2018 (Cth). Our approach in FY2025 builds on the foundational work completed in our first reporting period and continues to strengthen our processes and framework for identifying, assessing, and mitigating modern slavery risks within our operations and supply chains

Key principles

- Transparency and continuous improvement
- Alignment with regulatory expectations
- Integration of modern slavery risk management into governance and procurement practices

Risk assessment

We conducted a review of suppliers, considering industry sector, product/service type, and geographic footprint.

Sector and industry risks

Most suppliers operate in Professional Services and IT sectors within Australia, which typically carry low modern slavery risk. While the overall risk profile remains low, we maintain heightened vigilance in areas such as electronics, hardware procurement, offshore IT support, and property services, where supply chain complexity and subcontracting practices can increase vulnerability.

Overall, the risk of modern slavery is low when considering sector and industry risk.

Product and services risk

While most products and services are low-risk, certain categories such as laptops, computers, and mobile phones pose higher risk due to complex global supply chains. To mitigate this, we procure from established IT companies with strong sustainability and modern slavery commitments.

Promotional merchandise and branded apparel also present potential risk due to supply chain complexity and low-cost production pressures.

Overall, we have deemed our product and services risk exposure to modern slavery as low.

Geographic risk

The majority of suppliers are headquartered in Australia, with others based in the USA, UK, New Zealand, Europe, China, Vietnam and the Philippines. Count also has majority owned operations in India and the Philippines which pose higher inherent risk and which are addressed separately under the section 'Modern slavery risks in our own human capital.'

Overall geographic exposure during the period was assessed as low.

Modern slavery risks in our own human capital

We continue to assess modern slavery risks within our own workforce using the same structured approach as in the previous reporting period. Our assessment considers the following factors:

- **Australian based workforce**

Our employees are predominantly professionals directly employed in Australia, a jurisdiction considered low risk for modern slavery. All employment arrangements comply with Australian legislation and relevant requirements.

- **Governance and oversight**

We maintain internal policies and frameworks covering fair pay, labour standards, contract management, working conditions, and anti-discrimination. These policies are regularly reviewed to ensure compliance and effectiveness.

- **Equity partnerships and overseas operations**

We maintain oversight of operations in higher risk jurisdictions such as the Philippines and India. Count employees sit on the Boards of these entities to uphold governance standards and monitor compliance with our ethical frameworks. Officers of Count and its subsidiaries and employees regularly visit both the Philippines and India for business purposes, providing direct visibility of local operations. These visits allow management to assess working environments and engage directly with local teams.

In the Philippines, key practices include:

- Fair remuneration: Annual salary reviews informed by market conditions, with salaries set at least twice the annual minimum wage and benefits exceeding statutory requirements.
- Working conditions: High quality office facilities and flexible work-from-home arrangements, with working hours monitored for compliance.
- Governance and transparency: Regular reporting and active engagement by Australian management to ensure alignment with ethical standards.

Supplier questionnaires

All equity partnership businesses are required to complete modern slavery questionnaires to confirm compliance and identify any potential risks.

Global Slavery Index Reference

We reference the Global Slavery Index to inform our jurisdictional risk assessments, acknowledging that the index is updated every five years.

Overall assessment

Given our operational footprint, governance structures, and the predominance of an Australian based workforce, the risk of modern slavery within our direct operations remains low. However, we remain vigilant and committed to ongoing monitoring and improvement.

Incident reporting and remediation

Count provides multiple channels for employees, business partners, clients, and suppliers to report concerns about suspected or actual improper conduct, including modern slavery risks. Information on how and where to report is publicly available on our website and outlined in our Whistleblowing Policy and Procedures.

Introduction of independent whistleblower service

During this reporting period, we introduced an independent external whistleblowing service. This major enhancement reflects our commitment to impartiality and confidentiality,

ensuring that all disclosures are handled by an experienced third-party provider. This service complements existing internal reporting mechanisms and provides an additional layer of protection for individuals raising concerns.

Employee engagement and feedback

Our employees, including those in Equity Partnerships and Services businesses, participate in an annual full engagement survey ('Your Voice') and a mid-year pulse survey. These anonymous surveys provide an additional avenue for employees to raise concerns or highlight issues.

Investigation and remediation

Count is committed to thoroughly investigating all reports and taking appropriate action to address any identified issues. We did not identify any modern slavery related concerns during this reporting period. Should such an issue arise in the future, we would expect the contravening party to remediate the matter promptly. If remediation is not achieved to our satisfaction, we would seek to engage an alternative vendor.

Our policies

Count has implemented the following policies to assist us in combating modern slavery:

Code of Conduct

Our Code of Conduct outlines our commitment to ethical business practices and the standards we expect from our employees, officers and any other person performing work for Count.

Supplier Code of Conduct

This Code sets out the standards we expect from our suppliers, including adherence to labour laws and human rights.

Whistleblowing Policy

We encourage employees and suppliers to report any concerns related to modern slavery or human trafficking.

Work Health & Safety (WHS) Policy

This policy outlines our minimum standards for ensuring a safe work environment.

Leave Policy

We are committed to providing fair and equitable leave benefits including statutory leave benefits, carers leave, domestic violence leave etc.

Anti Bribery and Corruption Policy

This policy sets out Count's zero-tolerance approach to bribery and corruption. The policy includes clear rules on gifts and hospitality, conflict of interest management, and reporting obligations. Breaches may result in disciplinary action and reporting to authorities.

Our actions

Over the reporting period, we undertook the following initiatives to strengthen our approach to modern slavery risk management:

Risk assessment workshops

Held workshops to identify and assess potential modern slavery risks, prioritising suppliers deemed most significant based on operational impact and spend.

Collaborative review

Engaged key stakeholders to review and contribute to the Modern Slavery Statement and assess potential risks across our operations and supply chain.

Contract requirements

Continued to include modern slavery clauses in new supplier contracts to reinforce compliance expectations.

Targeted questionnaires

Distributed modern slavery questionnaires to suppliers identified as significant based on operational impact and spend, as well as those assessed as higher risk.

Enhanced reporting mechanisms

Strengthened whistleblower processes and established reporting channels for employees, suppliers, and stakeholders to raise concerns related to modern slavery.

Governance and oversight

Continued reporting modern slavery risks to the Board and Audit and Risk Committee as part of our broader risk management framework.

Targeted questionnaires

Distributed modern slavery questionnaires to suppliers identified as significant based on operational impact and spend, as well as those assessed as higher risk.

Enhanced reporting mechanisms

Strengthened whistleblower processes and established reporting channels for employees, suppliers, and stakeholders to raise concerns related to modern slavery.

Governance and oversight

Continued reporting modern slavery risks to the Board and Audit and Risk Committee as part of our broader risk management framework.

Entity-level review

Conducted a review of our entities and operations to assess modern slavery risks and requested all controlled entities to respond to our modern slavery questionnaire for improved visibility of risks and controls.

Supplier reviews

Assessed suppliers based on geographical location, industry sector, and product/service types to evaluate potential exposure to modern slavery risks, and reviewed suppliers' own Modern Slavery Statements to understand their efforts.

Supplier Code of Conduct

Distributed our Supplier Code of Conduct which outlines expected standards, including requirements to identify, address, and report on modern slavery to suppliers deemed significant and those assessed as higher risk.

Modern slavery resources

Reviewed global resources, including United Nations principles, International Labour Organisation (ILO) Conventions, and the Global Slavery Index, to strengthen our framework and supporting materials.

Future steps

We remain committed to strengthening our approach to modern slavery risk management and have identified the following priorities for future action:

Building awareness and capability

We recognise the importance of increasing awareness across the enterprise and have identified training as a key priority. While full implementation will take time, we are exploring practical and accessible training options across the enterprise.

Enhancing supplier governance

We will continue to mature our third-party supplier framework by embedding modern slavery risk considerations into onboarding, contract renewals, and ongoing supplier assessments.

Expanding risk assessments

We aim to increase the number of suppliers assessed for modern slavery risk year on year, prioritising those with greater operational significance or elevated modern slavery risk indicators.

Improving systems and data

We will continue integrating suppliers into our Enterprise Risk Management platform to provide a centralised view of supplier arrangements, laying the foundation for future enhancements in risk assessment processes.

Staying informed and compliant

We will monitor industry developments, review government resources, and keep up to date with legal changes, including proposed reforms to the Modern Slavery Act, to ensure alignment with best practices.

Engaging with suppliers and partners

We will continue to promote transparency and encourage adoption of ethical conduct and human rights commitments across our supply chain.

Measuring effectiveness

We plan to develop and track metrics to assess the impact of our actions, ensuring continuous improvement and accountability.

Appendix 1 – Reporting entities and mandatory reporting criteria

Statement on reporting entities

Count Limited is an Australian public company listed on the Australian Stock Exchange (ASX:CUP). The company is registered at Level 11, 45 Clarence St Sydney, NSW, Australia. Count owns controlling interests in various subsidiaries. This Modern Slavery Statement has been drafted on behalf of the reporting entity, Count Limited and its controlled entities. A list of the controlled entities (subsidiaries) can be found in the [Count Limited Annual Report 2025 pages 83-84](#).

Mandatory reporting criteria of the Modern Slavery Act

This statement has been prepared to comply with reporting requirements under the Act. The table below identifies where each criterion of the Act is disclosed within the sections of this statement.

Modern Slavery Act reporting requirements (Australia)	Modern Slavery Statement Section
Identify the reporting entity.	Pages 1 and 11
Describe the structure, operations, and supply chains of the reporting entity.	Pages 2-4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Pages 5-7
Describe the actions taken to assess and address those risks, including due diligence and remediation processes.	Pages 7, 9-10
Describe how the effectiveness of such actions is assessed	Pages 9-10
Describe the process of consultation with any entities the reporting entity owns or controls.	Pages 6-7
Include any other relevant information that the reporting entity considers important	Page 11