

FNZ HOLDINGS AUSTRALIA PTY LTD

MODERN SLAVERY STATEMENT

Version 1.0

June 2026

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1. Identification of the reporting entity

This Modern Slavery Statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) (The Act) and is submitted on behalf of FNZ Holdings Australia Pty Ltd (ABN 67 138 819 119) (FNZ Australia or the Entity).

FNZ Australia is an Australian entity operating in the Australian financial services market and is part of a corporate group with consolidated annual revenue meeting the AUD 100 million reporting threshold under the Act. FNZ Australia therefore qualifies as a reporting entity for the purposes of the Act.

2. Structure, operations and supply chains

2.1. Structure

FNZ Australia is a wholly owned subsidiary within the FNZ Group. The FNZ Group is a global provider of technology and administration services to the financial services and wealth management sectors.

2.2. Operations

FNZ Australia's operations support the provision of wealth management and investment platform services, including technology-enabled administration, operational support, client servicing, and associated professional services. The Entity's activities are predominantly professional and office-based in nature and are primarily conducted in Australia. Certain operational and support services are provided within FNZ Group and through third-party service providers.

2.3. Supply chains

FNZ Australia procures a wide range of goods and services to support its operations. These include:

- Technology and IT services (including software, applications and infrastructure)
- Professional services (including legal, audit, consulting and advisory services)
- Facilities management and office services
- Recruitment, labour hire and contingent workforce services
- Physical goods such as IT hardware, office equipment and consumables

Suppliers are predominantly located in Australia, with a subset operating offshore or delivering services through FNZ's Global operating model, including services provided through intra-group arrangements.

FNZ Australia applies a risk-based supplier classification framework in line with FNZ Group procurement and outsourcing policies including Supplier Code of Conduct. Suppliers are classified based on factors including criticality to service delivery, nature of services, geographic footprint, and inherent risk, with higher-risk and critical suppliers subject to enhanced due diligence, onboarding controls and ongoing oversight.

3. Modern slavery risks in operations and supply chains

FNZ Australia recognises that modern slavery encompasses serious human rights abuses, including forced labour, child labour, debt bondage, servitude, forced marriage and human trafficking.

3.1. Operations

Given the nature of FNZ Australia's business model, the Entity assesses the risk of modern slavery occurring within its direct operations as low. FNZ Australia's workforce is primarily engaged in skilled professional roles subject to Australian employment, workplace, and migration laws. Notwithstanding

this assessment, FNZ Australia recognises that modern slavery risks can arise in unexpected ways and maintains appropriate oversight and controls.

3.2. Supply chains

FNZ Australia acknowledges that modern slavery risks are more likely to arise within supply chains, particularly in areas involving:

- Labour-intensive services (such as facilities management, cleaning or labour hire)
- Multi-tier supplier arrangements
- Recruitment and subcontracting practices
- Suppliers operating across international jurisdictions

No confirmed incidents of modern slavery were identified in FNZ Australia's operations or supply chains during the reporting period. However, FNZ Australia recognises the importance of identifying and managing modern slavery risks on a continuous and proactive basis.

Consistent with this framework, FNZ Australia has identified certain supplier categories as inherently higher risk from a modern slavery perspective, including labour hire and contingent workforce providers, facilities management services, and suppliers with offshore operations or multi-tier subcontracting arrangements. These areas are prioritised for enhanced due diligence and ongoing monitoring.

4. Actions taken to assess and address modern slavery risks

FNZ Australia adopts a zero-tolerance approach to modern slavery and human trafficking, consistent with FNZ Group's ethical standards, procurement framework and supplier governance practices and adopts a risk-based and proportionate approach, recognising that this is FNZ Australia's first year reporting under The Act.

4.1. Governance and accountability

FNZ Australia recognises that its procurement, outsourcing and supplier management functions play a critical role in identifying and addressing modern slavery risks within supply chains. Supplier-related modern slavery risk is managed through FNZ's procurement and outsourcing frameworks, with oversight from risk and compliance functions and escalation through established governance forums where required.

These frameworks incorporate risk-based supplier classification, due diligence requirements and ongoing monitoring obligations, ensuring that modern slavery risks are considered within broader supplier risk assessments.

4.2. Policies and supplier standards

FNZ has a **Supplier Code of Conduct** (The Code), which applies to FNZ's Global supplier base and sets out minimum standards suppliers must meet. The Code explicitly addresses slavery and human trafficking risks and includes requirements and expectations for suppliers to:

- Ensure all work is undertaken voluntarily
- Prohibit forced, bonded or involuntary labour
- Avoid retention of workers' identity or travel documents
- Ensure employment terms are clearly communicated in a language understood by workers
- Prohibit recruitment fees being charged to workers (and require repayment if identified)
- Ensure third-party recruitment agencies comply with the same standards

- Suppliers are also required to communicate these principles through their own supply chains.

4.3. Due diligence and supplier assurance

FNZ's supplier procurement and outsourcing processes include:

- Supplier due diligence processes, including declarations of compliance and consideration of modern slavery risk factors
- Application of a risk-based approach, with enhanced due diligence applied to suppliers classified as higher risk or critical
- Periodic supplier reviews and refresh of due diligence information in line with supplier classification tiers
- Use of risk-based questionnaires and assurance mechanisms, including modern slavery considerations where relevant
- Contractual provisions requiring compliance with applicable modern slavery and labour laws and alignment with FNZ's Supplier Code of Conduct
- Audit and information request rights, particularly for higher-risk or critical suppliers

During the period, these processes were applied as part of standard procurement and supplier onboarding activities, with a focus on higher-risk and critical suppliers.

4.4. Training and Awareness

FNZ Australia recognises the importance of internal awareness in identifying and managing modern slavery risks. During the reporting period, targeted awareness was incorporated into procurement, supplier management and risk and compliance activities, supporting personnel involved in supplier onboarding and oversight to identify and escalate potential risks.

4.5. Escalation and remediation

Where potential modern slavery risks are identified, The Code provides a clear remediation process. This includes:

- Prompt engagement with the relevant supplier to understand the issue
- Agreement of remediation actions and reporting timeframes proportionate to the risk
- Ongoing monitoring until remediation actions are closed
- The ability for FNZ Australia to step into remediation or engage third parties where necessary
- Escalation to termination of the supplier relationship and referral to authorities where remediation is not achieved

5. Assessing the effectiveness of actions

FNZ Australia assesses the effectiveness of actions taken to address modern slavery risks through its existing procurement, outsourcing and supplier governance mechanisms. These include:

- Monitoring supplier adherence through due diligence, onboarding and periodic review processes
- Reviewing supplier responses to modern slavery and ethical conduct requirements
- Tracking remediation activity where potential risks are identified
- Reporting relevant matters through internal risk and governance

During the period, no instances of modern slavery were identified within FNZ Australia's operations or supply chains, supplier due diligence processes were applied on a risk-based basis, with enhanced focus on suppliers classified as higher risk or critical.

FNZ Australia recognises that its approach to measuring effectiveness will continue to evolve. As part of its ongoing maturity uplift, FNZ Australia intends to enhance the use of metrics, improve visibility of higher-risk suppliers and strengthen monitoring of remediation outcomes over time.

6. Consultation with owned or controlled entities

In preparing this Modern Slavery Statement, FNZ Australia consulted with relevant internal stakeholders across procurement, supplier management and risk and compliance functions. Input was informed by FNZ's supplier procurement processes, Supplier Code of conduct, associated procurement policies and procedures.

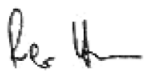
7. Other relevant information

FNZ Australia recognises that addressing modern slavery is an ongoing commitment. The Entity will continue to build on its existing procurement, outsourcing and supplier governance practices, with a focus on:

- Enhancing risk-based supplier segmentation and visibility of higher-risk supplier categories
- Expanding the integration of modern slavery considerations into supplier due diligence and onboarding processes
- Strengthening metrics and reporting to support effectiveness assessment
- Enhancing internal awareness and capability across procurement and supplier management functions
- Supporting responsible and ethical supply chains through ongoing supplier engagement.

8. Approval

This Modern Slavery Statement was approved by the FNZ APAC Board on 25 June 2026, in accordance with the requirements of the Modern Slavery Act 2018 (Cth).



Peter Hiom

Group Head of APAC and Group Head of Markets