



# MODERN SLAVERY STATEMENT



# 1. INTRODUCTION

Symbos TopCo Pty Ltd (ACN 675 615 648) (**Symbos TopCo**) and its subsidiaries (together **Symbos**) are committed to upholding the highest standards of ethical conduct and human rights. We recognise that modern slavery is a grave violation of fundamental human rights and are dedicated to ensuring that our operations and supply chains are free from all forms of modern slavery, including slavery, servitude, forced labour, human trafficking and child labour.

Symbos TopCo and its wholly owned subsidiaries have worked together to prepare this Joint Modern Slavery Statement (**Statement**) pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**). Each entity has been involved in creating and approving this Joint Statement, which has also been endorsed by the Symbos TopCo Board on 10 March 2026.



This Modern Slavery Statement outlines the steps taken by Symbos during the financial year ending 30 September 2025 to identify, assess, and address modern slavery risks in our operations and supply chains.

## Table of Acronyms & Abbreviations

ACRONYM/ABBREVIATION	DEFINITION
BPO	Business Process Outsourcing
ESG	Environmental, Social and Governance
GRC	Governance, Risk & Compliance
MSA	Master Services Agreement
NDA	Non-Disclosure Agreement
PP&C	People, Payroll & Culture
SOW	Statement of Work

## 2. MODERN SLAVERY MANDATORY CRITERIA

The Act requires Symbos to disclose information relating to its efforts to address the risks of modern slavery in their operations and supply chains.

The table below sets out the mandatory requirements of the Act and where those requirements are addressed in this Statement.

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### 3. THE SYMBOLS GROUP OF COMPANIES

This Statement covers the following Symbolos entities

<p><b>Advanced Collection Systems Pty Ltd</b></p> <p>ACN 084 498 126 <small>Click or tap here to enter text.</small></p> <p><b>Debtrak Pty Ltd</b></p> <p>ACN 104 897 887</p> <p><b>Debtrak Software Pty Ltd</b></p> <p>ACN 121 310 101</p> <p><b>Dove Technology Pty Ltd</b></p> <p>ACN 679 448 778</p> <p><b>Mason Black Lawyers Pty Ltd</b></p> <p>ACN 052 098 012</p> <p><b>Prushka Fast Debt Recovery Pty Ltd</b></p> <p>ACN 005 962 854</p> <p><b>Recoveries Corporation Holdings Pty Ltd</b></p> <p>ACN 615 707 072</p>	<p><b>Recoveries Corporation Pty Ltd</b></p> <p>ACN 052 138 799</p> <p><b>Symbolos Australia Holdings Pty Ltd</b></p> <p>ACN 616 221 124</p> <p><b>Symbolos Bidco Pty Ltd</b></p> <p>ACN 675 619 440</p> <p><b>Symbolos Customer Solutions Pty Ltd</b></p> <p>ACN 663 123 939</p> <p><b>Symbolos CX Pty Ltd</b></p> <p>ACN 687 979 228</p> <p><b>Symbolos HoldCo Pty Ltd</b></p> <p>ACN 675 619 048</p> <p><b>Symbolos Investment Holdings Pty Ltd</b></p> <p>ACN 633 574 535</p>	<p><b>Symbolos Managed Services Pty Ltd</b></p> <p>ACN 687 979 522</p> <p><b>Symbolos MidCo Pty Ltd</b></p> <p>ACN 675 618 103</p> <p><b>Symbolos TopCo Pty Ltd</b></p> <p>ACN 675 615 648</p> <p><b>Debtrak NZ Ltd</b> (NZ entity)</p> <p><b>Debtrak UK Limited</b> (UK entity)</p> <p><b>RCL Services Pte Ltd</b> (Fiji entity)</p> <p><b>Recoveries Corporation New Zealand Limited</b> (NZ entity)</p> <p><b>Symbolos Managed Services Inc.</b> (Philippine entity)</p>
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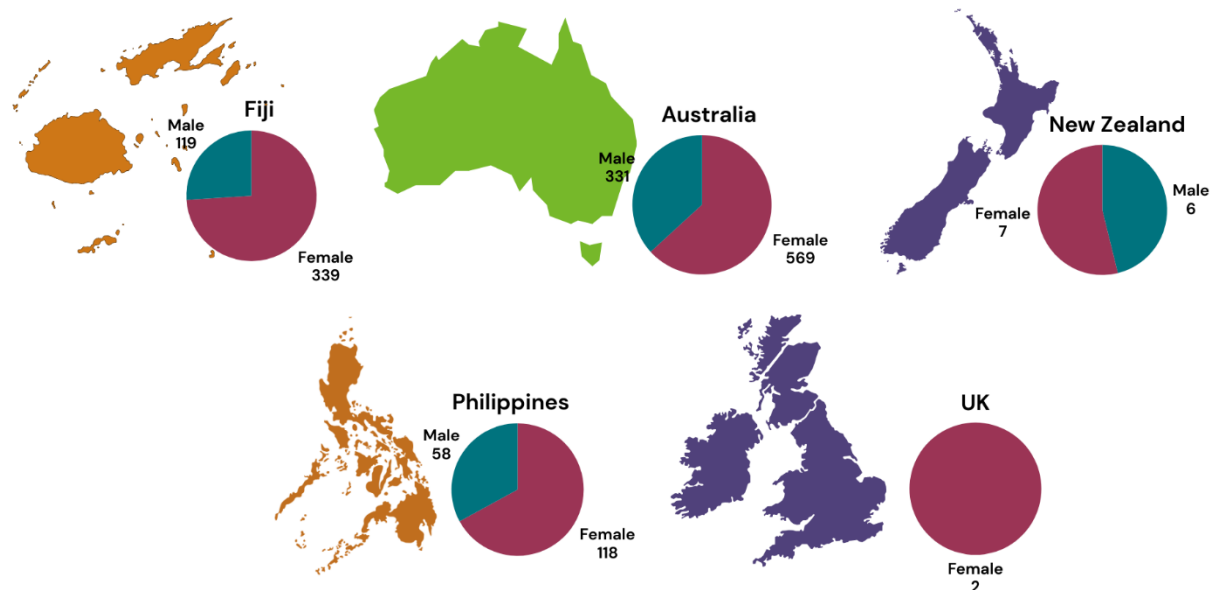
## 4. STRUCTURE & OPERATIONS

Symbolos is a leading provider of specialised customer experience solutions, combining exceptional people and innovative technology to deliver trusted, ethical, and high-quality outcomes for clients and communities. Symbolos has an annual consolidated revenue of at least \$100 million.

The overall business functionality of Symbolos is overseen by the Board of Directors and Executive Leadership Team of Symbolos TopCo. However, most supplier contracts are entered into by the key trading entities within the group.

We employ a diverse workforce and operate in compliance with all applicable national and international labour standards. Our operations are supported by a network of suppliers providing goods and services, including office supplies, IT infrastructure, professional services, and facilities management.

Symbolos TopCo has its head office in Victoria, Australia. Symbolos operates in Australia, New Zealand, Fiji, the Philippines and the United Kingdom.



## 5. PURPOSE & VISION

### Our purpose

*Together we are trusted to create exceptional experiences for our clients and our community. Everything we do starts with trust: trust from our clients, trust in each other, and trust that we'll show up with care, accountability and intent. We work alongside our clients to solve real problems and create experiences that genuinely make a difference.*

### Our vision

*To be your trusted partner to create exceptional customer experiences – powered by innovation and people who care. Better every day. We believe the best experiences are built where smart technology meets human understanding. Our vision is to keep raising the bar for our clients and ourselves, improving how we work and what we deliver, every single day.*

### Our values

#### Be Exceptional

*We hold ourselves to a high standard in how we think, act and deliver. Exceptional outcomes come from attention to detail, pride in our work, and a relentless focus on quality.*



Be Exceptional

#### Act as One

*We succeed together. We collaborate openly, respect different perspectives, and work as an extension of our clients' teams to achieve shared outcomes.*



Act as One

#### Improve and Simplify

*We're always looking for better ways to work. We challenge complexity, learn continuously, and simplify wherever possible to create clearer, more effective experiences.*



Improve and Simplify

## 6. SUPPLY CHAIN RISKS

Our supply chain primarily supports technology-enabled contact centres, business process outsourcing and professional services. While the Group does not operate in sectors traditionally associated with high prevalence of modern slavery, we recognise that certain categories of suppliers present elevated inherent risk due to labour intensity, geographic factors or reliance on subcontracting.

Symbolos has conducted a review to identify potential modern slavery risks in our operations and supply chains. While our operations are primarily based in Australia (149<sup>th</sup>), New Zealand (148<sup>th</sup>) and the United Kingdom (145<sup>th</sup>) which are considered low-risk jurisdictions according to the Global Slavery Index, we acknowledge that certain jurisdictions such as Fiji (unranked) and the Philippines (36<sup>th</sup>) may pose heightened risks.

Based on internal risk assessments and the nature of our operations, the following supply chain areas have been identified as presenting the most relevant modern slavery risk exposure for Symbolos.

### *Information Technology Hardware and Equipment*

Symbolos procures IT hardware and related equipment, including laptops, desktops, peripherals and networking devices.

While these suppliers are typically engaged through reputable global brands or authorised resellers, the manufacture of electronic hardware may involve complex, multi-tier global supply chains. Risks may arise at upstream manufacturing stages, particularly where components are sourced from jurisdictions with weaker labour protections.

Modern slavery risks in this category are managed through:

- preference for established suppliers with ethical sourcing standards;
- contractual obligations requiring compliance with applicable laws; and
- risk-based supplier assessment prior to onboarding.

### *Facilities Management and Workplace Services*

Facilities-related services, such as cleaning, security, maintenance and building services, are recognised as a potential risk area due to their reliance on:

- low-wage or casualised labour;
- subcontracting arrangements; and
- outsourced service models.

These characteristics can increase vulnerability to underpayment, exploitation or non-compliant labour practices, particularly where multiple layers of subcontractors are involved.

Symbolos manages these risks by:

- engaging suppliers that operate within established regulatory frameworks;
- incorporating contractual compliance and termination provisions; and
- maintaining oversight through relationship management and issue escalation mechanisms.

### *Offshore and Near-Shore Service Providers*

Symbolos operates and partners with service providers in offshore and near-shore locations, including business process outsourcing and technology support services.

While offshore operations enable service scalability and operational efficiency, they may present increased modern slavery risk due to:

- differences in local labour standards and enforcement;
- labour-hire or recruitment intermediaries; and
- broader regional human rights risk profiles.

To address these risks, Symbolos applies enhanced due diligence to offshore suppliers, including:

- risk-based assessment during onboarding;

- contractual requirements aligned to labour standards and ethical conduct;
- ongoing monitoring and review proportionate to risk; and
- internal governance oversight through the Group's risk and compliance framework.

### ***Professional and Specialist Services***

Symbos also engages professional service providers, including legal, consulting, audit and advisory firms.

These suppliers are generally assessed as lower inherent risk due to professional regulation, licensing requirements and established governance frameworks. However, residual risk may exist where professional firms outsource elements of their services to third parties or offshore providers.

Modern slavery risks in this category are managed through:

- supplier due diligence proportionate to the engagement;
- contractual controls; and
- reliance on regulatory and professional obligations applicable to these providers.

### ***Other Goods and Services***

Lower-risk categories such as office supplies, software licences and standard business services typically present limited modern slavery risk, particularly where no personal data is handled and services are delivered within Australia or comparable regulatory environments. These suppliers are assessed through simplified due diligence processes consistent with their risk profile.

### ***Ongoing Risk Assessment***

Symbos recognises that modern slavery risks may change over time as operations, supplier relationships and external conditions evolve. Accordingly, supply chain

risk areas are reviewed periodically, and due diligence processes are refined to ensure continued alignment with regulatory expectations and best practice.

## 7. ACTIONS TAKEN

We have systems in place to:

- Identify and assess risk areas in our business operations and supply chains.
- Mitigate the risk of modern slavery occurring in our business operations and supply chains.
- Monitor risk areas in our business operations and supply chains.
- Protect those reporting through grievance mechanisms.

Further detail regarding the actions we have taken to combat modern slavery are set out below.

During the reporting period, Symbolos implemented the following measures to address modern slavery risks:

### 1. Policy Review and Updates:

- Conducted a review of our Modern Slavery Policy and drafted a Supplier Code of Conduct to ensure alignment with best practices and emerging trends.
- Updated supplier contracts to include express terms requiring compliance with anti-modern slavery measures.

### 2. Supplier Due Diligence:

- Conducted risk assessments of new and existing suppliers.
- Mapped our supply chain to identify and evaluate potential areas of vulnerability.
- Obtained key compliance documents from Suppliers such as Modern Slavery Policies or Statements.
- Conducted regular audits and risk assessments to monitor adherence.

### 3. Training and Awareness:

- Delivered modern slavery compliance training to all employees.
- Raised awareness of modern slavery risks through the PP&C Newsletter.

### 4. Whistleblowing Mechanisms:

- Promoted our Whistleblowing Policy to employees, suppliers, and other stakeholders, providing a secure and confidential channel for reporting concerns.

### 5. Collaboration and Stakeholder Engagement:

- Engaged with suppliers and stakeholders to discuss modern slavery risks and compliance requirements.
- Established Modern Slavery Working Group to oversee modern slavery initiatives and ensure continuous improvement.

## 8. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Symbolos is committed to continuous improvement in our efforts to combat modern slavery. We measure the effectiveness of our actions through:

- Conducting regular audits and risk assessments of our supply chain.
- Tracking the completion rates of modern slavery training for employees.
- Reviewing and updating our policies and procedures.
- Monitoring and addressing any reports received through our whistleblowing mechanisms.

### Identification of incidents and remediation

During the reporting period, Symbolos did not identify any incidents of modern slavery within its operations or supply chain. Consequently, the Group was not required to undertake any remediation steps.

## 9. OUR COMMITMENT TO COMBATTING MODERN SLAVERY

Symbolos is committed to ensuring that modern slavery does not occur in our operations or supply chains. This commitment is embedded in our governance framework and supported by our Modern Slavery Policy, which outlines our approach to identifying and mitigating modern slavery risks.

We expect all employees, contractors, and suppliers to adhere to our zero-tolerance approach to modern slavery. This expectation is reinforced through our policies, including:

- **Anti-Bribery and Corruption Policy:** Prevents unethical influence in business decisions, reducing the risk of exploitative or coercive practices within supply chains.
- **Conflict of Interest Policy:** Ensures decisions are made impartially and transparently, minimising the risk of relationships that could enable exploitation or unethical labour practices.
- **Cultural Holidays Swap Policy:** By respecting cultural practices, the policy reinforces the principle of treating individuals with dignity—central to modern slavery prevention.
- **Diversity and Inclusion Policy:** Aim to protect individuals from exploitation and ensure fair treatment.
- **Equal Opportunity - Anti-Discrimination, Anti-Harassment and Anti-Bullying Policy:** Ensures fair treatment of all employees and compliance with national minimum wage laws.
- **Family Violence (AU & NZ):** Sets out the organisation's commitment to recognising, responding to, and supporting individuals affected by family violence, while ensuring compliance with applicable Australian and New Zealand laws.

- **Flexible Working Arrangements Policy:** Prevents exploitative conditions by ensuring fair treatment and autonomy for workers.
- **Governing Complex Third-Party Interactions Policy:** Provides controls for managing high-risk external relationships, helping ensure third-party partners operate ethically and do not engage in modern slavery.
- **Indigenous Procurement Policy:** Promotes sourcing from businesses that uphold human rights standards, reducing the likelihood of forced labour or unethical practices.
- **Parental leave (AU & NZ):** The policy aims to provide job protection, income support where available, and flexible return-to-work arrangements, recognising the importance of family wellbeing and workforce participation.
- **Recruitment Policy:** Mandates the use of reputable employment agencies and verification of their practices.
- **Supplier Code of Conduct:** Sets clear expectations for ethical behaviour and compliance with modern slavery laws.
- **Whistleblowing Policy:** Encourages reporting of concerns related to modern slavery, with protections against retaliation.

## 10. SUPPLIER DUE DILIGENCE AT SYMBOLS – IN PRACTICE

Supplier due diligence at Symbolos is a risk-based, proportionate process embedded within the group's procurement, onboarding and ongoing vendor management framework. It is designed to ensure that suppliers are fit for purpose, legally compliant, ethically aligned, and capable of meeting Symbolos' information security, privacy, human rights and regulatory obligations.

The process applies across Symbolos Australia Holdings Pty Ltd and all controlled entities, and is overseen by the Governance, Risk & Compliance (GRC) function in collaboration with Legal, Procurement, Technology and the relevant business owner.

## 1. Initial Supplier Identification and Business Need Definition

Supplier due diligence begins when a business unit identifies a need to engage a new supplier or materially vary an existing supplier relationship.

At this stage:

- The business clearly defines the scope of services or goods, intended use, and whether the supplier will:
  - Handle personal information or customer data
  - Access Symbolos systems or premises
  - Operate offshore or in higher-risk jurisdictions
- The engagement is assessed for fit-for-purpose, including quality, reliability, price and timeliness considerations.

This ensures due diligence is triggered early, before any confidential information is shared or services commence.

## 2. Supplier Risk Classification and Exposure Assessment

Once a supplier is identified, the GRC team conducts a formal risk classification in accordance with the Procurement & Vendor Management Policy and Procedure.

This assessment considers:

- Nature of the services (e.g. BPO, technology, legal, data processing)
- Data access and hosting arrangements
- Regulatory and legislative exposure
- Geographic footprint
- Whether the supplier is critical to operations

The outcome is a Vendor Risk Consequence rating, which determines the depth and type of due diligence required prior to onboarding. Higher-risk suppliers are subject to enhanced checks and approvals.

### 3. Pre-Onboarding Due Diligence Checks

Depending on the supplier's risk profile, Symbolos may require some or all the following:

#### *(a) Supplier Code of Conduct Acknowledgement*

All suppliers are required to receive, acknowledge and agree to comply with the Symbolos Supplier Code of Conduct.

The Code sets minimum standards in relation to:

- Legal and regulatory compliance
- Labour and human rights (including prohibition of forced and child labour)
- Ethical business conduct and anti-corruption
- Environmental responsibility
- Data protection and confidentiality
- Oversight of subcontractors and supply chains

Suppliers must cooperate with reasonable compliance assessments and remediation where issues are identified.

#### *(b) Vendor Attestation and Compliance Questionnaire*

For suppliers handling data, technology, or regulated services, Symbolos requires completion of a Vendor Attestation Form, covering:

- Privacy and data protection compliance
- Information security controls (including ISO-aligned practices where applicable)
- Local law constraints and compensating controls
- Insurance coverage (e.g. professional indemnity)
- Remediation plans where gaps are identified

Responses are reviewed by GRC and Legal before onboarding proceeds.

#### *(c) Legal, Financial and Structural Checks*

Depending on the engagement:

- Corporate registration details (ABN/ACN or equivalent) are verified
- Appropriate contractual documents are prepared (e.g. NDA, MSA, SOW)
- Confidentiality obligations must be executed before any sensitive information is disclosed.

#### **4. Contractual Controls and Risk Allocation**

All material supplier engagements are governed by written agreements incorporating risk-appropriate protections, including:

- Data protection and confidentiality obligations
- Audit and information rights
- Compliance with laws, industry codes and Symbolos policies
- Termination rights for serious or repeated non-compliance
- Flow-down obligations to subcontractors

These controls ensure that due diligence findings are operationalised through enforceable contract terms, rather than remaining purely procedural.

#### **5. Ongoing Monitoring, Review and Audits**

Supplier due diligence at Symbolos is not a one-off exercise. Once onboarded:

- Suppliers are subject to periodic reviews, attestations or audits based on risk profile
- High-risk or critical suppliers may undergo formal audits or enhanced monitoring
- Issues, incidents or complaints involving suppliers are tracked and escalated through established governance channels

Supplier review activity and remediation status are reported through regular risk and compliance reporting, including group-level risk reports.

## 6. Breach Management and Remediation

Where a supplier is identified as breaching the Supplier Code of Conduct or contractual obligations:

- Symbolos engages with the supplier to agree on corrective actions and timeframes
- Suppliers must provide evidence of remediation
- Failure to remediate, or serious/repeated breaches, may result in contract termination

This approach balances constructive remediation with the ability to decisively manage unacceptable risk.

## 7. Integration with Modern Slavery and ESG Obligations

Supplier due diligence is a key component of Symbolos' Modern Slavery risk management framework. This includes:

- Risk-based assessment of suppliers, particularly in higher-risk sectors or jurisdictions
- Contractual requirements addressing modern slavery risks
- Ongoing awareness and escalation mechanisms

These practices directly support Symbolos' annual Modern Slavery Statements and broader ESG reporting.

# 11. OUR CONSULTATION PROCESS

## Step 1. Establish Governance Charter

Form a Modern Slavery Working Group comprising representatives from each reporting entity.

Include Legal, Finance (Procurement), HR, and Compliance & Risk teams.

Define roles and responsibilities for drafting, reviewing, and approving the process.

## **Step 2. Initial Policy Review**

Review existing Modern Slavery Policy and Supplier Code of Conduct for alignment with the Act.

Identify gaps such as victim support mechanisms, reporting entity definitions, and compliance monitoring.

## **Step 3. Stakeholder Consultation**

Conduct workshops with stakeholders: GRC, Legal, Procurement and HR.

Discuss risk areas, due diligence expectations, and remediation processes.

## **Step 4. Drafting the Process**

Risk Assessment: Supply chain mapping and high-risk sector identification.

Due Diligence: Vendor attestation and audit requirements.

Training: Mandatory sessions for procurement and contract managers.

Reporting & Whistleblowing: Confidential channels for disclosures.

Remediation: Clear steps for addressing breaches and supporting victims.

## **Step 5. Internal Review & Feedback**

Circulate draft to all entities for comment.

Use Working Group meetings to resolve issues and finalise wording.

## **Step 6. Formal Approval**

Obtain endorsement from each entity's Board or delegated authority.

Document approvals and maintain records for audit purposes.

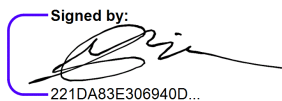
## 12. FUTURE COMMITMENTS

To further strengthen our approach to combatting modern slavery, Symbolos is committed to:

- Conducting annual audits of high-risk suppliers to ensure compliance with our Supplier Code of Conduct.
- Enhancing supplier engagement through targeted communication and educational materials on modern slavery risks.
- Promoting our Whistleblowing Policy to suppliers and encouraging them to adopt similar measures.
- Reviewing and updating our modern slavery and ethical-related policies to ensure they remain effective and aligned with best practices.

## 13. FINAL MESSAGE FROM SYMBOLOS

Symbolos remains steadfast in its commitment to eradicating modern slavery and upholding human rights across its operations and supply chains. We will continue to work collaboratively with our employees, suppliers, and stakeholders to ensure that our business practices reflect our values and commitment to ethical conduct.


Signed by:  
  
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Chester Moynihan

**Chairperson**

**Symbolos TopCo Pty Ltd**





This Statement is issued on 10 March 2026

This Statement is available on the Symbos website

<https://symbos.com/ModernSlavery>

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