



MODDEKO PTY LTD

MODERN SLAVERY ACT STATEMENT 2025



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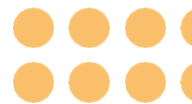
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5 ELK



Introduction

At 5 ELK, we believe business is first and foremost about people. Our purpose is to create meaningful careers for our team members, while supporting our clients in building sustainable, human-centred businesses. Protecting human rights and ensuring that modern slavery and exploitation have no place in our operations or supply chains is not just a legal obligation - it is a reflection of who we are and what we stand for.

We understand that behind every decision sits a person, a family, and a community. That is why our approach to preventing modern slavery goes beyond compliance. We are intentional about the way we design our operations, the partners we choose, and the standards we hold ourselves to, because the wellbeing of people comes first.

This statement sets out the actions we are taking to meet our obligations in accordance with section 16 of the Modern Slavery Act 2018 (Cth) and how we are embedding these commitments into the way 5 ELK does business.

Company Overview

5 ELK is a professional services provider delivering outsourced solutions to clients across a range of industries, with a focus on financial planning, mortgage broking, and accounting. While outsourcing is often framed around cost, our approach is different. Our model is built around creating high-quality, sustainable roles that allow our team members to thrive and grow while giving clients the support they need to focus on what matters most.

We are more than a workforce provider. As a values-driven organisation, we are committed to building long-term partnerships and creating environments where both our clients and team members succeed together.

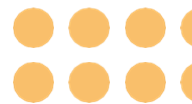
Our Structure and Operations

5 ELK operates under **Moddeko Pty Ltd**, an Australian company headquartered in Fremantle, WA. Our operational hub is based in Cebu, Philippines, where we employ over 500 professionals through our company **Elka Asenso Outsourcing Inc.** We also have a Hong Kong company, **Elka Group Incorporated**, which services our UK-based clients.

We deliver a broad range of services – including administration, accounting support, compliance, financial services back-office processing, IT solutions, and customer engagement. What sets us apart is our people-first perspective:

- We place a strong emphasis on cultural alignment and training, ensuring that our people are not just “resources” but engaged team members contributing to client success.
- Our operations are designed to provide career pathways and professional development opportunities, lifting standards for offshore roles and creating positive social and economic outcomes.





Our Supply Chains

We are selective about the suppliers and partners we engage. Our supply chains include IT equipment, software providers, office supplies, and professional services. But beyond cost and convenience, we choose partners who share our values - those who are committed to motivating, engaging, and supporting people, not simply sourcing cheap labour.

We recognise that certain regions and industries are more vulnerable to modern slavery risks. This awareness drives us to actively question, review, and select suppliers who demonstrate ethical practices and who align with our expectations of fairness, respect, and accountability.

Due Diligence and Risk Assessment

We conduct due diligence on suppliers and business partners to ensure alignment with ethical standards and the Modern Slavery Act. This includes:

- Assessing the risk of modern slavery within our operations and supply chains.
- Requiring suppliers to confirm their compliance with relevant labour laws and ethical frameworks.
- Conducting checks and reviews of suppliers in higher-risk sectors or geographies.
- Prioritising long-term relationships with suppliers who invest in their people and operate transparently.

Our decision-making is guided by the principle that we should never compromise on human dignity or fairness in the pursuit of efficiency.

Modern Slavery Risks in Operations and Supply Chains

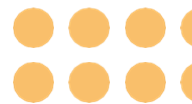
We acknowledge that elements of our operations and supply chains may carry inherent risks. The key areas where we have identified potential exposure include:

- External suppliers, particularly those located in regions with elevated risks of labour exploitation.
- Third-party services that may involve high-risk sectors like cleaning and security services.

Policies on Modern Slavery

5 ELK has a framework of policies and processes in place to identify and mitigate potential and actual human rights impacts, including modern slavery. These policies reflect our commitment to acting ethically and with integrity in all our business relationships. This policy is communicated to all employees and suppliers to ensure they understand our stance on modern slavery.





Reporting Mechanisms

At 5 ELK, we take seriously our responsibility to ensure that all team members, whether in Australia or the Philippines, feel safe and supported to raise concerns. We have established clear reporting mechanisms designed to ensure transparency, accessibility and protection for those who speak up. This includes:

- **Employment Protections:** In Australia, all team members are employed under Fair Work Australia guidelines, with clear contracts and access to independent advice. In the Philippines, team members receive an employee handbook that outlines rights, entitlements, and clear guidance on labour laws.
- **Wellness Program Support:** As part of our wellness program, employees can access confidential counselling – covering financial, mental health, emotional wellbeing, and legal advice. This support extends beyond the workplace, ensuring people feel supported holistically.
- **Clear Escalation Pathways:** Issues can be raised through multiple channels, including direct reporting to People & Culture, confidential HR consultations, and escalation to senior leadership where necessary. Processes are designed to avoid conflicts of interest and to ensure that all concerns are heard and acted on promptly.
- **Commitment to Transparency:** We encourage open dialogue and feedback and protect anyone who raises concerns from retaliation.

Actions Taken to Address Modern Slavery Risks

To live up to our values and comply with the Modern Slavery Act, 5 ELK has embedded practical steps into our daily operations and supply chain relationships. These measures are not just about meeting compliance but about building a culture of responsibility and care:

1. **Supplier Code of Conduct** – We have a Supplier Code of Conduct that sets out clear, non-negotiable expectations around ethical labour practices. It is a binding standard that we actively apply and hold our partners accountable to, not just a document for formality's sake. Every supplier we engage with must agree to these standards, and we monitor compliance to ensure they are upheld.
2. **Supplier Assessments and Reviews** – We carry out checks on suppliers, especially in higher-risk sectors, to ensure their labour practices align with our values. Where suppliers fail to meet these standards, we act decisively – including ending relationships if necessary.
3. **Embedding Standards in Contracts** – Contracts with suppliers and clients include commitments to fair treatment of workers, reinforcing accountability across our ecosystem.
4. **Employee Training and Awareness** – Training on modern slavery and ethical business practices is provided to all team members across 5 ELK. We also partner with external organisations, including government bodies, to deliver sessions that give a neutral, credible perspective on rights and responsibilities. This ensures our people have the knowledge, confidence, and independent context to identify risks and act responsibly.
5. **Grievance and Escalation Pathways** – We provide confidential and conflict-free ways for concerns to be raised and resolved, whether they come from employees, contractors, or suppliers.
6. **Annual Review and Reporting** – We commit to reviewing our modern slavery policy and processes annually, ensuring they remain relevant and effective as risks evolve.





Training and Awareness

At 5 ELK, we believe that awareness and education are essential in preventing modern slavery. To ensure all employees understand the risks of modern slavery in both our operations and supply chains, we provide regular training to equip our people with the knowledge and confidence to act responsibly. This includes:

- **Recognising Risks:** Team members are trained to identify signs of modern slavery and exploitation, from supplier behaviour to workplace conditions.
- **Clear Response Steps:** Training includes what to do if exploitation is suspected - making it clear how to report and who to approach.
- **Embedding in Culture:** Awareness of human rights and ethical practice is integrated into our onboarding, leadership development, and ongoing training programs.
- **External Voices:** We engage external organisations, including government agencies, to deliver sessions that provide neutral and credible guidance to our team.
- **Shared Accountability:** We reinforce the message that preventing modern slavery is not the responsibility of one team or department, it is shared by everyone at 5 ELK.

Continuous Improvement

5 ELK understands the evolving nature of modern slavery risks and is committed to continuously strengthening our approach by:

- Regularly updating our Modern Slavery Policy to reflect changes in legislation, risks, and best practices.
- Engaging with stakeholders, including suppliers, employees, and clients, to raise awareness and promote ethical practices across our network.
- Enhancing our due diligence and monitoring processes to ensure they remain robust and effective.

Approval and Publication

This Modern Slavery Act Statement has been approved by the Board of Directors of 5 ELK prior to publication and is signed by our Managing Director. It will be reviewed annually and updated as necessary to reflect our ongoing commitment to addressing modern slavery.

DANIELLE CORNELISSEN

Managing Director and Chief Executive Officer

Moddeko Pty Ltd (5 ELK)

September 2025

