VERSION 1

Modern Slavery Statement

Reporting Period: 1 January 2025 – 31 December 2025

Prepared in accordance with the Modern Slavery Act 2018 (Cth), Commonwealth of Australia

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Reporting Entity	Version 1 Holdings Limited (Ireland Company No. 532721), covering Version 1 Pty Ltd (ABN 19 101 580 250)
Applicable Legislation	Modern Slavery Act 2018 (Cth)
Document Classification	Controlled
Document Owner	Risk and Compliance
Approval Authority	Board of Directors of Version 1 Holdings Limited (the reporting entity), approving the joint statement on behalf of itself and Version 1 Pty Ltd under the Modern Slavery Act 2018 (Cth)

Contents

1. Identification of the Reporting Entity

This section identifies the Australian reporting entity to which this statement applies, the reporting period it covers, and the basis on which Version 1 is required to report under the Modern Slavery Act 2018 (Cth).

1.1. Reporting Entity

This statement is made by Version 1 Holdings Limited (the reporting entity), a foreign entity carrying on business in Australia, incorporated in Ireland. Identifying information for the reporting entity:

Legal name: Version 1 Holdings Limited

Company number: 532721 (Ireland)

Registered office address: Park Place, [amend address]

This statement covers the reporting entity and the following entity it owns and controls that carries on business in Australia:

Version 1 Pty Ltd (ABN 19 101 580 250; ACN 101 580 250), registered office Suite 701, 9 Help Street, Chatswood, New South Wales 2067, Australia, trading as Version 1.

1.2. Reporting Period

This statement covers the period 1 January 2025 to 31 December 2025.

1.3. Type of Statement

This is a joint statement made by Version 1 Holdings Limited on behalf of itself and Version 1 Pty Ltd, prepared under the Modern Slavery Act 2018 (Cth). The reporting entity has prepared this statement to cover the Australian operations and supply chains of Version 1 Pty Ltd, which it owns and controls, alongside the relevant Group operations and supply chains that support them. The process of consultation between the reporting entity and Version 1 Pty Ltd is described in Section 6.

Note: Version 1 Holdings Limited is the reporting entity because it meets the mandatory threshold and carries on business in Australia. Version 1 Pty Ltd, the Australian entity, does not meet the threshold on its own and is covered by this joint *statement as an entity owned and controlled by the reporting entity. Owned and controlled entities are addressed in Sections 2 and 6.*

1.4. Basis for Reporting

Version 1 Holdings Limited is a reporting entity under the Australian Modern Slavery Act 2018 (Cth) as it carries on business in Australia and meets the criteria set out in the Act.

This Statement covers Version 1 Holdings Limited and the entities it owns or controls, including Version 1 Pty Ltd."

1.5. Previous Statements

This is Version 1's first Modern Slavery Statement under the Australian Modern Slavery Act 2018 (Cth). Version 1 also publishes a separate annual statement under the United Kingdom Modern Slavery Act 2015. The two statements are currently prepared independently to reflect the differing requirements of each regime.

2. Structure, Operations and Supply Chains

This section describes Version 1's organisational structure, the operations conducted in Australia, and the supply chains that support those operations. It provides the context required for the modern slavery risk assessment in Section 3.

2.1. Organisational Structure

Version 1 is an IT Services and Solutions provider trusted by major organisations in both the public and private sector. Version 1 was established in Ireland in 1996 and for 30 years, since its establishment Version 1 has delivered on 3 commitments: making a real difference for their customers, building an empowering culture, and growing a strong organisation for the future.

Version 1 operates and does business in and from several countries in addition to Australia. These include Ireland, United Kingdom, Spain, Slovenia, India, and the US. Version 1 partners with several global technology leaders to provide our customers with the highest quality solutions and services. Our supply chains include cloud services providers, IT hardware and distribution, business travel providers, consultancy and professional services, in addition to technology partners such as Oracle and Microsoft.

Owned and controlled entities covered by this statement: Version 1 Pty Ltd (Australia)

Headcount in Australia: 12

Office locations in Australia: Suite 701, 9 Help Street, Chatswood, New South Wales 2067, Australia

2.2. Operations

Version 1's core operations in Australia consist of the design, development, deployment and ongoing support of cloud-based and AI-enabled technology solutions for customers. Typical activities include:

- Cloud migration, modernisation and managed services
- Software development and software-as-a-service delivery
- Artificial intelligence and data analytics services
- IT consulting and advisory services
- Application support and managed services

Primary customer sectors served in Australia:

In Australia, Version 1's customer engagements are primarily focused on public sector and government-related organisations, reflecting the established capability of the Version 1 Group in delivering large-scale, well-governed digital services.

In line with the Group's broader sector expertise, Version 1's engagements in Australia may also include customers in regulated and infrastructure-intensive industries such as:

- Financial services
- Energy and utilities
- Healthcare
- Transport
- Other large enterprise and commercial organisations

2.3. Supply Chains

Version 1's supply chain in support of its Australian operations is primarily characterised by the procurement of professional services, technology hardware and software, and corporate services. The principal categories of suppliers are:

- Cloud infrastructure providers (hyperscale cloud platforms used to host customer workloads)
- Software vendors and licensors
- Hardware suppliers and resellers (laptops, peripherals and end-user computing equipment for staff and, where applicable, customers)
- Subcontracted technology professionals and contingent workforce providers
- Office services, including cleaning, catering, security, building maintenance and facilities management
- Corporate professional services (legal, audit, recruitment, marketing, travel)
- Telecommunications and connectivity providers

Total number of Tier 1 suppliers in the reporting period: 16

Geographic distribution of supply chain spend: Version 1's supply chain spend is primarily associated with professional, corporate, and technology services supporting operations across multiple jurisdictions, including Australia, the UK, Ireland/EU, USA and other regions where the Group operates.

Use of AI training data and data annotation services: Version 1 uses artificial intelligence in a controlled and responsible manner, underpinned by robust governance and platform controls, including the use of approved tools and processes embedded within its Integrated Management System (IMS). Version 1 applies clear expectations for the use of data in AI-enabled services, including controls intended to prevent Version 1 or customer data being used to train external AI models without specific prior consent, and to ensure appropriate human oversight for AI-assisted outputs where required. As an AI services provider, Version 1 recognises that certain AI-related supply chain activities, including data sourcing, data labelling/annotation and content moderation can involve outsourced workforces and may present heightened modern slavery and human rights risks depending on the nature of work, the provider model and the jurisdictions involved. Version 1 therefore considers modern slavery risk as part of its approach to sourcing and outsourcing decisions for AI-related services and will continue to strengthen supplier expectations, contractual safeguards and due diligence measures where such services are procured.

Version 1 acknowledges that visibility beyond Tier 1 suppliers is limited at this stage. Improving visibility into deeper tiers of the supply chain particularly for hardware and AI-related services is an area for future maturation.

3. Modern Slavery Risks in Operations and Supply Chains

This section describes the risks of modern slavery practices in Version 1's Australian operations and supply chains, and in any entities the reporting entity owns or controls, addressing the requirement in section 16(1)(c) of the Act.

3.1. Approach to Risk Identification

Version 1 distinguishes between modern slavery risks that may arise in its direct operations and those that may arise in its supply chains. The assessment considers the eight forms of modern slavery defined in the Modern Slavery Act 2018 (Cth): trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

As a first-time reporter, Version 1's risk assessment for this reporting period reflects an initial baseline. The assessment is informed by published sectoral risk indices, geographic risk data, and the Attorney-General's Department guidance, rather than by a quantitative supplier-level due diligence programme. Maturation of the assessment in subsequent reporting cycles is a stated intention rather than a current capability.

3.2. Risks in Direct Operations

Version 1's direct operations are predominantly office-based professional services delivered by skilled employees in regulated labour markets in Australia and across the Version 1 Group. The inherent risk of modern slavery in these direct operations is assessed as low. However, residual risk areas include:

- Use of contingent workforce and contractor labour, particularly where engagement is layered through agencies or subcontractors and where visibility into employment terms may be reduced.
- Recruitment practices for technology talent, including international hires, where deceptive recruiting or unlawful recruitment fees charged by third-party agents could occur if not adequately controlled.
- Office services delivered on Version 1 premises (cleaning, security, catering, facilities), which the Attorney-General's Department guidance identifies as recognised higher-risk service categories.

3.3. Risks in Supply Chains

Modern slavery risks in Version 1's supply chains are higher than those in direct operations and are concentrated in the following areas.

3.3.1. Technology Hardware

The manufacture of laptops, servers, networking equipment and electronic components has well-documented modern slavery risks at deeper tiers of the supply chain, including in component and raw material sourcing (notably cobalt, polysilicon and other minerals). Version 1 procures hardware predominantly from established OEMs and authorised resellers, but visibility beyond Tier 1 is limited.

3.3.2. Cloud Infrastructure and Data Centres

Although Version 1 does not own or operate data centres, the construction and operation of hyperscale data centres relied upon by Version 1's services may involve construction labour, security, cleaning and catering sectors with recognised modern slavery risk profiles. Version 1's exposure is indirect and arises through its hyperscaler partnerships.

3.3.3. AI Training Data, Data Annotation and Content Moderation

As an AI services provider, Version 1 recognises that certain AI-related supply chain activities, including data sourcing, data annotation/labelling and content moderation, can involve outsourced workforces and may present heightened modern slavery and human rights risks depending on the nature of work, the provider model and the jurisdictions involved. Version 1’s approach to AI is underpinned by robust governance and platform controls (including the use of approved tools and processes embedded within its Integrated Management System (IMS)) and, where third-party services are used, Version 1 seeks to apply appropriate safeguards and oversight. In this context, reported risk themes in the wider sector can include excessive working hours, low pay, deceptive recruitment practices and other labour-rights concerns; these considerations inform Version 1's sourcing and outsourcing decisions and its ongoing focus on strengthening supplier expectations, contractual safeguards and due diligence where relevant.

3.3.4. Subcontracted Technology Professionals

Where work is delivered through subcontracted personnel, including via offshore delivery centres or third-party staffing partners, risks may arise around recruitment fees charged to workers, retention of identity documents, and contractual terms imposed on individual contractors.

3.3.5. Office Services and Facilities

Cleaning, security, catering and facilities services are consistently identified by the Attorney-General's Department as higher-risk procurement categories due to the prevalence of vulnerable workers, subcontracting layers and competitive pricing pressures.

3.3.6. Corporate Services and Travel

Lower-risk in aggregate, but specific exposures may exist in hospitality and accommodation services used for corporate travel.

3.4. Risks in Owned or Controlled Entities

The Australian reporting entity operates as a standalone trading entity within the wider Version 1 Group and does not have any subsidiaries or related entities that it owns or controls locally. Accordingly, the modern slavery risk profile described in Section 3 of this statement relates to the operations and supply chains of the reporting entity itself. Should the reporting entity acquire or establish owned or controlled entities in future reporting periods, their risk profiles will be assessed and disclosed in subsequent statements.

3.5. Limitations of this Assessment

As Version 1's first Modern Slavery Statement under the Australian Act, this risk assessment is preliminary. Specific limitations include limited visibility beyond Tier 1 suppliers, the absence of a completed supplier-level modern slavery risk screening for the Australian portfolio, and the evolving nature of risk in AI-related supply chains. Version 1 commits to addressing these limitations in subsequent reporting cycles, as set out in Sections 4 and 8.

4. Actions Taken to Assess and Address Modern Slavery Risks

This section describes the actions taken by Version 1 to assess and address modern slavery risks in its operations and supply chains, including due diligence and remediation processes, addressing the requirement in section 16(1)(d) of the Act. A distinction is drawn between actions implemented during or before the reporting period and actions planned for future reporting cycles.

4.1. Governance and Policy Framework

Actions Implemented

Version 1 maintains a suite of governance, ethics and compliance frameworks that support responsible business conduct and inform our approach to identifying, preventing and addressing modern slavery risks. These include whistleblowing / protected disclosures arrangements that enable employees and relevant third parties to raise concerns confidentially and without fear of retaliation, published modern slavery disclosures and supporting anti-slavery policy commitments, an Anti-Corruption & Anti-Bribery Policy reflecting Version 1's zero-tolerance approach to bribery and corruption, and a Supplier Code of Conduct that sets expectations for suppliers on human rights, labour standards and ethical conduct, including modern slavery. These frameworks are supported by Version 1's independently audited Integrated Management System and certifications, including ISO/IEC 27001 (Information Security Management), ISO 20000-1 (Service Management), ISO 14001 (Environmental Management), ISO 9001 (Quality Management), ISO/IEC 42001 (AI Management System), and Cyber Essentials and Cyber Essentials Plus. Version 1's Modern Slavery Statements are reviewed at Board level. Each of these policies and frameworks is monitored on an ongoing basis and reviewed at a minimum annually to ensure it remains current, effective and aligned to evolving legal, regulatory and operational requirements.

Planned Actions

Version 1 is continuing to grow its Risk and Compliance function. As part of this uplift, Version 1 intends to develop more robust monitoring and oversight of suppliers, including enhanced governance for supplier onboarding and ongoing supplier management. This programme will include the review and updating of key frameworks such as the Supplier Code of Conduct, Anti-Bribery and Corruption Policy and related ethics and compliance policies, as well as an overhaul of training to strengthen modern slavery, human rights and ethical conduct content and improve capability across relevant functions.

4.2. Due Diligence in Supply Chain

Actions Implemented

During the reporting period, Version 1 applied due diligence processes to support responsible sourcing and to strengthen oversight of modern slavery and related ethical risks in its supply chain. All suppliers (not only Tier 1) are required to complete an onboarding screening process, and Version 1 issues suppliers with a Client Due Diligence Questionnaire as part of this process. Version 1 also requests clients to confirm compliance with Version 1's Supplier Code of Conduct (SCOC) and, where applicable, to provide a copy of their own Modern Slavery Statement. Version 1 currently uses Dun & Bradstreet to support screening activities; this screening capability is under further development.

Planned Actions

Within 2026, Version 1 aims to onboard additional screening providers to enhance the screening already being conducted. This enhancement is intended to strengthen Version 1's ability to identify and respond to integrity and human-rights related red flags across different jurisdictions, and to better inform risk-based decisions on onboarding, renewal and ongoing supplier management. Version 1 also intends to define clearer screening workflows and escalation pathways, including risk-based triage of screening results, defined triggers for enhanced due diligence, and an approach to periodic re-screening appropriate to supplier risk. In parallel, Version 1 intends to enhance and refresh training materials for all Version 1 staff, including updated guidance on identifying modern slavery indicators, understanding the role of due diligence and supplier engagement, and knowing how to raise and escalate concerns through internal reporting channels.

4.3. Operations and Workforce

Actions Implemented

- **Recruitment channels (including international hires) -** Recruitment for Australia has been managed directly by the internal Talent Acquisition team using our standard recruitment channels. These include direct sourcing, internal referrals, and direct applications via our careers site. There has been no reliance on third-party agencies for hiring in Australia during the current reporting period.

  For recent roles, recruitment activity has been led internally by the team (with support from colleagues), maintaining a direct hiring model consistent with our broader Talent Acquisition strategy.

- **Right-to-Work Checks** - Version 1 requires Right to Work checks to be completed for all new hires prior to start date as part of the formal Pre-Employment Screening process, in line with immigration requirements. Checks are completed using approved methods (including online share codes where applicable), supported by live identity verification via video call, with evidence securely retained in the HR system to maintain statutory excuse and audit compliance.

- **Recruitment Agency Vetting** – We have not engaged external recruitment agencies for Australia-based hiring during the reporting period. As such, agency vetting processes have not been required in this context. More broadly, where agencies are used in other jurisdictions, Version 1 applies standard due diligence and onboarding controls to ensure alignment with our ethical and compliance standards.

- **Prohibition of recruitment fees charged to candidate** - Version 1 operates a policy whereby candidates are never charged recruitment fees. All recruitment costs, where applicable, are borne by the organisation. This applies globally, including Australia, and is consistent with our commitment to fair and ethical recruitment practices.

- **Ethical Conduct Training** - Ethical conduct is addressed throughout the induction programme rather than through a dedicated standalone module. It is principally covered within the Responsible Technology Board session, which addresses ethics, trust and responsible decision-making, and is further referenced in the Strength in Balance session through the ESG pillar of ethical behaviour. Additional reinforcement is provided through the organisation's core values of honesty and integrity, together with data, privacy and governance topics covered in the IT session.
- **Training** - As at the reporting period, 100% of procurement staff have completed certified Modern Slavery Training. Version 1 is also currently in the development stage of creating and rolling out mandatory Modern Slavery Training for all Version 1 staff. This training is intended to raise awareness of modern slavery risks, support understanding of individual and organisational responsibilities, and reinforce the importance of identifying, escalating and addressing potential indicators of modern slavery within operations and supply chains.

Planned Actions

In future reporting cycles, Version 1 intends to continue strengthening its approach to managing modern slavery risks within its operations and workforce. This is expected to include the rollout of mandatory Modern Slavery Training for all staff, together with more targeted awareness content for functions with a particular role in prevention and oversight, including Procurement, Human Resources and people managers. Version 1 also intends to keep its recruitment, onboarding and contractor engagement processes under review to support continued alignment with fair recruitment principles, including the prohibition on worker-paid recruitment fees, and to ensure appropriate oversight where third-party labour providers or agencies are used. In addition, Version 1 intends to further embed awareness of modern slavery indicators within workforce-related processes and to strengthen internal escalation pathways so that relevant concerns can be identified, raised and addressed in a timely and consistent manner.

4.4. Grievance Mechanisms and Remediation

Actions Implemented

Version 1 maintains a Whistleblowing Policy and confidential reporting channels that enable employees and other relevant stakeholders to raise concerns (including concerns relating to modern slavery and human rights) without fear of retaliation. Reports can be made confidentially and, where permitted by law, anonymously, and are handled in accordance with Version 1's investigation and escalation processes.

Planned Actions

In 2026, Version 1 intends to redevelop and enhance its training materials for all staff to further strengthen awareness of reporting options, expected standards of conduct, and the role of early escalation in preventing and addressing modern slavery risks.

5. Assessing the Effectiveness of Actions

This section describes how Version 1 assesses the effectiveness of the actions described in Section 4, addressing the requirement in section 16(1)(e) of the Act.

5.1. Approach to Measuring Effectiveness

As Version 1's first Australian Modern Slavery Statement, the approach to measuring effectiveness is at a foundational stage. Version 1 acknowledges that the maturity of effectiveness assessment is expected to develop over successive reporting cycles.

5.2. Limitations

Version 1 acknowledges the following limitations in its current ability to assess effectiveness:

- As a first-time Australian reporter, no longitudinal data is available to assess year-on-year improvement.
- Visibility beyond Tier 1 of the supply chain is limited, which constrains the assessment of supply chain-level outcomes.
- The absence (or low maturity) of supplier-level modern slavery audits during the reporting period limits direct evidence of supplier compliance.

Addressing these limitations is a stated objective of Version 1's planned actions for future reporting cycles, as set out in Section 4 and Section 8.

6. Consultation

This section describes the consultation process undertaken in preparing this statement, including consultation with any entities owned or controlled by the reporting entity, addressing the requirement in section 16(1)(f) of the Act.

6.1. Consultation with Covered and Controlled Entities

As a joint statement, this statement has been prepared in consultation with each entity it covers. Version 1 Holdings Limited, as the reporting entity, consulted with Version 1 Pty Ltd in preparing this statement. Consultation included engagement between the Group Risk and Compliance function and the Australian leadership team, review of the draft by Australian management, and confirmation of the Australian operational and supply chain information set out in Sections 2 to 5. Version 1 Pty Ltd does not itself own or control any further entities. The statement has been prepared with reference to information and input from relevant functions within the Version 1 Group to ensure alignment with the Group's governance, operations, and supply chain framework.

6.2. Internal Consultation

In preparing this statement, Version 1 engaged directly with the following teams: Risk and Compliance, Procurement, Human Resources (HR), Legal, Environmental, Social and Governance (ESG), Information Security, Finance and the Board of Directors.

The Human Resources team, including and the Learning and Development Department, provided insights into the processes each department uses for onboarding, induction, and training. In addition, we consulted with our Procurement team in Ireland and India, to understand how procurement-related onboarding and training are managed across different geographies and to gain a clearer understanding of our supply chains and to ensure relevant risks were appropriately addressed.

Through collaborative discussions and sharing of departmental practices, we ensured a comprehensive understanding of how new joiners are introduced to Version 1's culture, compliance requirements, and ongoing professional development opportunities.

Their input has informed our disclosures related to workforce management and training initiatives.

7. Additional Information

This section provides additional information that Version 1 considers relevant to its modern slavery disclosures. Inclusion of this section is voluntary under section 16(1)(g) of the Act.

7.1. Commitments for Future Reporting Cycles

Version 1 recognises that this first Australian Modern Slavery Statement establishes a baseline. In future reporting cycles, Version 1 intends to:

- Build out a risk-based supplier due diligence programme aligned to the Australian operations, including the rollout of a third-party risk screening tool.
- Increase visibility into deeper tiers of the technology hardware supply chain through supplier engagement and sectoral collaboration.
- Develop a formal, documented remediation procedure aligned to the UN Guiding Principles on Business and Human Rights.
- Expand modern slavery awareness training across the Australian workforce, with targeted modules for procurement and people-management roles.
- Develop and report on a defined set of effectiveness indicators (see Suggested KPIs section).

7.3. Relationship to Version 1's UK Modern Slavery Statement

Version 1 publishes a separate annual statement under the United Kingdom Modern Slavery Act 2015. The UK statement and this Australian statement describe overlapping group-wide policies and controls, but are prepared independently to reflect the distinct mandatory criteria of each regime. The UK statement (click here) does not substitute for, and is not incorporated by reference into, this Australian statement.

7.4. Forward-Looking Regulatory Considerations

Version 1 is monitoring the outcomes of the Australian Government's response to the 2023 statutory review of the Modern Slavery Act 2018 (Cth) (the McMillan Review), and the work of the Australian Anti-Slavery Commissioner. Anticipated regulatory developments — including the potential introduction of penalties for noncompliance, mandatory due diligence requirements and a declaration framework for high-risk regions — are being considered as part of Version 1's forward roadmap.

8. Approval and Signature

This statement has been approved in accordance with the joint statement provisions of the Modern Slavery Act 2018 (Cth). The principal governing body of the reporting entity, Version 1 Holdings Limited, approved this statement on behalf of itself and Version 1 Pty Ltd, and the statement is signed by a responsible member of the reporting entity.

8.1. Approval

This statement was approved by the Board of Directors of Version 1 Holdings Limited, in its capacity as the principal governing body of the reporting entity, on behalf of itself and Version 1 Pty Ltd.

8.2. Signature

Signed by:

Signed by:

Patrick Cooney

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Patrick Cooney

Director, Version 1 Holdings Limited

Date: 26-06-2026

Note: As a joint statement, this statement is approved by the principal governing body of the reporting entity, Version 1 Holdings Limited, on behalf of itself and Version 1 Pty Ltd, and signed by a responsible member of that body. This approval is distinct from approval of the UK Modern Slavery Act statement and cannot be substituted by it.