

X-Company Group Modern Slavery Statement for the period 1 January 2025 to 31 December 2025

Introduction

This statement is for the period from 1 January 2025 to 31 December 2025 (“**Reporting Period**”) and has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (“**Act**”) for and on behalf of the following listed entities:

Unless otherwise stated, the information contained in this statement is current as at 31 December 2025.

Reporting Entity	ABN
X-Worlds Pty Ltd	33 162 112 487
Fives.Com Pty Ltd	20 657 617 466
Remote Roll Pty Ltd	91 160 801 347
X-Project Pty Ltd	87 160 801 329
X-Five Pty Ltd	84 146 308 876
Flywire Pty Ltd	17 111 444 421
X-Media International Pty Ltd	47 650 585 961
XWP Pty Ltd	26 664 913 973
XWP.co Pty Ltd	78 169 465 972
X-Company Pty Ltd	65 149 500 569
X-Team International Pty Ltd	95 160 801 301
X-Team Global Pty Ltd	99 670 499 224

In this statement, the term “**Group**” means the reporting entities listed above.

Group Structure

The Group operates using an entirely remote operating structure, and operates under several unique brands, each targeting a specific purpose. These brands are:

X-Team. Since 2006 X-Team has been providing high-performing, on-demand scalable teams of developers to some of the world's leading brands. Teams range from 1 to 100+ engineers in over 50 countries and are made up of passionately curious driven developers ready to scale your team to project success.

Xfive. The Xfive digital product studio was founded in 2005 with the ambition of helping socially responsible businesses and organizations start, operate, and succeed in the modern digital age, achieving this by building human-centred digital experiences.

XWP. XWP, a digital agency specialising in complex enterprise WordPress websites, was founded in 2014. XWP is a 100% remote service-based company, employing a range of team members, including Project Managers, Product Owners, Designers, Solutions Engineers, Frontend and Backend Engineers together with all necessary support staff.

The Group clients include Riot Games, Fox, NewsCorp, Beachbody, OFX, Vox Media and many more.

Global Structure

X-Team. Assisting clients around the world with projects, the X-Team team has 40 employees spread across Australia, United States and Canada, and over 450 contractors in 40 countries.

Xfive. Consisting of 8 employees based in Poland, and 44 contractors in 7 countries, the Xfive team is ideally situated to assist its customers to succeed.

XWP. The XWP team has 12 employees spread across Australia, Canada, Great Britain, and the United States and over 30 contractors located in 20 countries.

Structure in Australia

The Group's leadership is headquartered in Australia. The C-Suite Leadership Team (employees in Australia) is 4 full-time males and 1 full-time female.

Gender diversity within the Australian operations of X-Team reveals that out of a total of 27 employees, 14 are male, constituting 52% of the workforce, while 13 are female, making up 48%. When it comes to employment categories, there are no contractors in Australia. There are 25 full-time employees, 2 part-time employees (comprising 1 female and 1 male), and no casual employees.

Gender diversity within the Australian operations of XWP reveals that out of a total of 3 employees, 1 is male, constituting 33% of the workforce, while 2 are female, making up the other 67%. When it comes to employment categories, there are two contractors in Australia. One employee is employed full-time, and two are employed part-time.

Group Purpose and Values

Our Purpose:

The Group is a values-driven team, striving to create a welcoming and empowering diverse

community where everyone feels safe and respected. With teams drawing upon engineers from around the world and enjoying the benefit of being a fully remote company, the Group understands the benefits of diversity with people in over 75 countries, such as Brazil, Argentina, the Dominican Republic, Poland, Japan, Australia, Canada and the USA.

In the Group we try to level the playing field for candidates in the recruitment process, including by assigning candidates from underprivileged communities a dedicated recruiter to help guide them through the process, and we give them tips on how they can improve aspects of their application or gain more experience to improve their chances of joining the Group and making our community a more diverse place.

In 2019, the Group set an ambitious goal: to achieve carbon neutrality by the end of 2020. We succeeded, becoming a fully carbon-neutral company that year by offsetting our emissions through investments in sustainable carbon projects, including highly efficient cookstoves in Tanzania and Malawi. Since then, we have proudly maintained our carbon-neutral status and remain dedicated to upholding this commitment as we continue to grow.

The Group acknowledges the global prevalence of modern slavery and fully supports efforts by governments and the private sector to eradicate it. We are committed to seizing opportunities and taking proactive steps to ensure modern slavery has no place within our organisation or its broader operations.

Our values:

More than just the values inherent to our purpose, each of the Group's brands has its own values to drive its core purpose, being:

X-Team:

At X-Team, our values are what empower us to make a difference in our local societies, in our industry, and drive us towards our mission. Our values are centered on being HEROIC, with a focus on inspiring each individual to be able to contribute and make a difference.

These values are:

- **Honesty:** We value open and direct communication. Trust is key, so everyone in our team feels comfortable sharing their ideas openly. Our commitment to honesty fosters lasting success and builds genuine, reliable relationships that propel our company, projects, and partnerships forward
- **Excellence:** At X-Team, excellence is about consistently aiming for and upholding the highest standards in all we do. We're dedicated to achieving outstanding outcomes through careful planning, precise execution and continuous improvement. This commitment to excellence fuels our creativity and guarantees that we not only meet but exceed expectations, always moving forward.
- **Respect:** At X-Team, respect is the foundation of our interactions and collaborations. We value the diverse backgrounds and perspectives of our team members, ensuring everyone feels heard and valued. This commitment to respect fosters a positive and inclusive work environment, where differences are celebrated, and mutual understanding is prioritised.
- **Ownership:** Ownership empowers every X-Teamer to take charge of their contributions and drive their initiatives forward with proactive zeal. This value cultivates a culture where accountability is expected, and initiative is rewarded, leading to efficient problem-solving and firm commitment to our collective goals.
- **Intrepreneurship:** Intrepreneurship at X-Team means fostering a mini-ecosystem of innovation within our walls. We encourage and support our team to think and act like entrepreneurs, turning creative ideas into practical solutions that drive our growth and adaptability.
- **Curiosity:** Curiosity drives X-Team beyond the status quo, as we encourage a culture of continuous learning and exploration - We're Not Done Yet. This pursuit not only

fosters personal growth and organisational improvement but also ensures we stay ahead of industry curves. By directing our curiosity strategically, we deepen our understanding of customer needs and refine our solutions.

Xfive:

Xfive is a digital product studio that helps socially responsible businesses and organizations to start, operate, and succeed in the modern digital age. Founded in 2005 its mission is to help our clients achieve their online goals by building human-centred digital experiences. Our values are based on commitment to craft and driving positive change in the world, which we accomplish through:

- **Feedback culture matters.** We believe in giving feedback not only to you, but also to ourselves. We strive for better work ethics based on sharing every piece of information we have. We want you to feel empowered and have the mental space to make best decisions without worrying about what's behind the next turn.
- **Caring as much as you do.** You trust us with your business, this one project that your online success depends on. You put your heart into it and it's only fair that you expect the same amount of care, focus, and attention from us. Before we recommend solutions, we listen to understand the problems you face.
- **No surprises. Open cards.** You bring your best self to the negotiation table, discovery session or a call with a software engineer. Like us, you don't know everything, but you want to play open cards. You want us to anticipate problems and explain solutions. We'll tell before you ask. No surprises!
- **Optimal Solutions to your challenges.** We're agile by nature. We understand your goals are unique to you and your business. We know our craft and understand that things do not always go as planned, so we'll respond to change and alter our approach and tools to get you through the finish line and deliver the results you want.
- **Our values make us who we are.** Human connection, giving back to the community, embracing diversity; we know what we stand for, and we are proud of it. While striving for a global reach, we build and maintain real relationships with our team members and business partners alike. Supporting and lifting each other up helps us all achieve greatness.

XWP:

XWP is a leading full-service digital agency catering to enterprise-level clients.

Our XWP core values are:

- **Giving.** We care and aim to contribute our best wherever we serve.
- **Teamwork.** We unite our strengths, respect & support each other.
- **Mastery.** We always strive to grow our skills, find better ways & share them.

Operations & Supply Chain

While the Group offers products and services around the globe, the broader Group works and operates together to support the success of all operations of the Group. Each of our brands has different operations and supply chains, being:

X-Team:

X-Team provides software engineering via a staff augmentation model. X-Team's services include front and backend development, mobile development, devops, data engineering, UX design and more. X-Team works with partners to help them scale their teams and capacity with a fully remote flexible workforce.

As a fully remote company supplying software engineers and developers from around the world, we have no fixed place of operations.

From an assessment of the goods and services purchased by X-Team, X-Team's supply chain is characterised largely by a group of contractors engaging with X-Team in a personal or small business/self proprietor capacity. Other areas making up part of our supply chain include:

- the supply of services;
- the supply of hardware products and related services; and
- the supply of software (including Software as a Service ("**SaaS**").

The X-Team approach in working remotely around the globe as a tightly knit community provides the Group with opportunities to combat the risks of modern slavery compared to other industries and companies.

Xfive:

Xfive is a digital product studio specializing in building scalable MVPs and web applications, delivering e-commerce solutions, and redesigning websites. We value lasting relationships with socially responsible businesses and organizations, aiming to support positive change through our expertise and innovation.

Since our establishment in 2005, we have operated primarily as a remote-first company, with over 70% of our team working remotely. Our headquarters are located in Melbourne, Australia, with an operational center in Krakow, Poland, where approximately 20 staff members work on-site at least once a week.

As a digital products studio, we have the following supply chain:

- the engagement of services for the business predominantly from sole traders and small businesses around the world;
- the supply of services and products to our Krakow office;
- the supply of hardware products and related services; and
- the supply of software (including SaaS).

XWP:

XWP utilises its broad range of team members in operation of a digital agency specialising in complex enterprise WordPress websites. We are a 100% remote service-based company providing our expertise to solve complex needs for larger organisations. We collaborate together virtually and async across different locations and time zones around the world to deliver projects for our clients.

XWP has no physical goods, with our supply chains consisting predominantly of:

- the engagement of services for the business directly from the service providers themselves, being predominantly either sole traders or 1 to 2 person companies; and
- the purchase of online services, provided ordinarily as SaaS online tools.

Risks of Modern Slavery in Group Operations and Supply Chain

The Group understands the importance of taking steps to ensure that no modern slavery exists within its operations, and within its supply chain (no matter at what level). From review of its Group operations and supply chains in 2025, and as the Group is a provider of services, the Group is fortunate to be able to assess the risks of modern slavery existing in our Australian operations and supply chains as very low.

To assess and understand the modern slavery risks within its operations and supply chain, the Group has undertaken a detailed analysis of our operations and supply chains, and in doing so have identified the following areas of key risk of modern slavery:

X-Team:

With our supply chain being predominantly the engagement of independent contractors, this is the major risk of modern slavery existing in our operations and supply chain. While we engage independent contractors from around the world, including from locations where modern slavery unfortunately exists, X-Team works directly with the individual contractor, contracting and dealing with them directly, and not through the use of third party middle men where poor transparency can exist.

Instances where X-Team engages with a company and doesn't have named contractors in an agreement are very rare (under 1% of engagements), and are treated with additional caution to ensure that there are appropriate levels of transparency and risk.

Broadly, the Group views software engineering as being a relatively low risk industry, with software engineers and developers enjoying high wages and high portability of skills across companies and geographies.

Xfive:

Similar to X-Team, Xfive's supply chain is predominantly its engagement of independent contractors. In line with Xfive's values we contract directly with our contractors, ensuring they have clearly defined roles and conditions, and being remunerated fairly adequate to their position.

Given its current operating practices, Xfive considers that the risk of modern slavery existing within its operations and supply chains is very low.

XWP:

The major component of XWP's supply chain is its engagement of independent contractors. The XWP team is drawn from across the world, including locations where the risk of modern slavery exists, and we combat the risk of modern slavery through overwhelmingly engaging directly with our independent contractors.

In relation to the risks of modern slavery arising from the purchase of SaaS, we ensure that risks are controlled through not engaging with SaaS with unknown origins.

XWP is committed to ensuring the elimination of modern slavery from its operations and supply chains, with its assessment of the current risk being very low due to the nature of its business.

Actions Taken to Assess and Address the Modern Slavery Risks

To help identify modern slavery risks within its operations and supply chains, the Group takes an enterprise-wide approach, including utilising the following steps:

- engagement within the Group to understand and learn about modern slavery risks, and best practices to help eliminate the risks;
- the inclusion of key clauses into our contracts addressing modern slavery risks and compliance, so as to better place the Group in a position to assess, consider, and monitor the risks of modern slavery within our operations or supply chains;
- use of the Global Slavery Index to help identify key geographic risks for modern slavery when sourcing suppliers and contractors around the world;
- ongoing monitoring by the board of directors of each of the companies forming part of the Group in relation to how the anti-modern slavery measures are working and their impact on eliminating the risks of modern slavery within our operations and supply chains;
- established a modern slavery audit committee within the Group, meeting on a quarterly basis, to monitor the ongoing effectiveness of the anti-modern slavery efforts; and
- implementation of an additional know-your-client policy applicable to all Group vendors.

The Group also uses two key strategies to help eliminate the risks of modern slavery, being the identification and elimination during the selection process (including both in hiring and in procurement), and the fostering of a strong community within the organisation to enable excellent cross-community communications and the reporting of any issues or concerns (whether modern slavery related or otherwise).

In addition to the above, each of the brands have undertaken the following:

X-Team:

In 2024 X-Team implemented advanced training across each of its sub-teams, to better understand, align and improve compliance to the X-Team values, including in respect of modern slavery.

X-Team has also created an internal core handbook to provide greater transparency and alignment of cross-departmental policies and procedures, with this handbook updated and continuing to be rolled out in 2025.

Xfive:

The Xfive team utilises a wiki to assist it in its day to day operations, which has been updated since 2023 to include information and policies to support our team's awareness of the risks of modern slavery and how they can help address it.

Xfive is committed to frequently updating the wiki to ensure it remains relevant, as well as to reviewing its modern slavery risks and steps taken on an ongoing basis.

XWP:

During 2025, XWP has continued to review and strengthen its policies and processes to support the ongoing identification and management of modern slavery risks within our operations and supply chains. The measures established in 2024 remain in place and are

actively maintained, upheld, and refreshed as required. These include:

- the ongoing maintenance of a Modern Slavery and Human Rights Statement, stored on an internal wiki accessible to all employees and contractors, and reviewed periodically to ensure it remains current;
- continued inclusion of modern slavery clauses in all contracts between XWP and its independent contractors and clients, with templates and terms kept under review;
- the continued requirement that our SaaS providers and other key suppliers with an annual spend exceeding \$5,000 have publicly available modern slavery or human rights statements, which we verify as part of our supplier oversight;
- ongoing upkeep of a Modern Slavery Compliance Register where supplier modern slavery and human rights statements are recorded, stored, and updated at least annually;
- sustained reporting lines and escalation paths for any modern slavery concerns identified by team members, supported by internal guidance and reminders as needed; and
- continued maintenance of the online team handbook addressing ethical business practices, reinforcing expectations and helping ensure that unethical risks such as modern slavery do not exist within XWP's operations or supply chains.

Assessing Effectiveness

The Group understands that the fight to eliminate modern slavery is an ongoing one, and that no matter how good a system we create, the risk of modern slavery will always remain and need to be addressed.

In understanding that this process is ongoing, the Group undertakes the following assessment steps to try and ensure that any remaining risks are captured and addressed:

- all contractors are reviewed at least annually to ensure that they are complying with the Group's policies and procedures;
- all suppliers to the Group undergo an annual review and assessment in relation to their compliance with the Group's policies and procedures;
- the Group uses multiple reporting channels, including a dedicated online reporting facility, for both Group members, suppliers, contractors, and other third parties to report anything outside of the Group's policies and procedures, or anything else of concern;
- use of the modern slavery audit committee within the Group to monitor the ongoing effectiveness of the anti-modern slavery efforts; and
- the board of each company in the Group undertaking half-yearly reviews into the effectiveness, and any problems or other issues arising under, the Group's modern slavery policies and procedures.

As part of further strengthening its response to the risk of modern slavery, the Group has established a working group of select individuals from across the wider Group tasked with championing the further development of processes and procedures to monitor and eliminate modern slavery risks from the organisation ("**Working Group**"). This Working Group is responsible for assessing the effectiveness of actions taken to prevent modern slavery and eliminate its risk.

In the event that any modern slavery is reported or otherwise discovered within the Group's operations or supply chains, the Group intends to take the following actions:

- investigate the reported potential incident of modern slavery to understand the facts;
- in the event that any modern slavery is discovered in that investigation, the relevant board of directors will determine:
 - whether it is possible to work with the relevant contractor or supplier to develop an improvement plan and associated audits to ensure that all modern slavery within that contractor/supplier is eliminated as a matter of priority; or
 - if the board considers that the above is not realistically achievable, how the Group can exit the relationship with the contractor or supplier in a way that does not place additional further harm on anyone who has been negatively affected.

Over and above this, each of our brands is committed to making the following improvements going forward:

X-Team:

Our goals during 2025 were to continue to improve the company's frameworks and reporting processes, while also monitoring ongoing and emerging modern slavery risks. Additionally, we undertook a further modern slavery risk review (as part of our ongoing annual review process) in 2025 to help ensure all risks have been properly identified, assessed, and addressed.

During 2025, X-Team:

- rolled out additional training modules in relation to modern slavery;
- implemented a "Concerns and Incidents" form allowing individuals to easily flag issues to operations leads and leadership in relation to any identified modern slavery

- concerns; and
- implemented additional modern slavery questionnaires into onboarding of vendors.

Xfive:

Xfive continues to review the steps undertaken to address modern slavery risks to help ensure they are effective and working in its current operations and processes.

XWP:

In 2026, XWP intends to:

- Include an XWP team member as part of the Modern Slavery Audit Committee;
- Update its Modern Slavery Compliance Register with 2025 statements from SaaS providers and other key suppliers who provide services to XWP that exceed an annual spend of \$5,000; and
- Develop an additional training module on modern slavery for completion by all XWP contractors and employees.

Consultation

All companies forming part of the Group operate under a common set of policies and procedures; and share a common board team. In developing its policies and procedures, the Group has focussed on ensuring the involvement and collaboration of a broad diverse group of people from across the organisation, ensuring that each company is not only consulted but involved in the development, implementation, and monitoring of all relevant practices and procedures.

Other Information

The Group proudly supports the principles of the UN Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

This Modern Slavery Statement represents the Group's efforts to reflect on the actions we have taken so far and how best to approach combatting this global issue. We have scrutinised the steps that we have put in place to mitigate the risks of modern slavery to our business, and will continue to monitor and enhance our approaches to help eliminate the risk of modern slavery.

We recognize and understand the importance of the laws regarding modern slavery and are committed to reviewing and assessing the modern slavery risks in our supply chain.

This statement has been approved by the board of each of the companies forming part of the Group



David Nigel Rosen, sole director of each of:

X-Worlds Pty Ltd (ABN 33 162 112 487)
Fives.Com Pty Ltd (ABN 20 657 617 466)
Remote Roll Pty Ltd (ABN 91 160 801 347)
X-Project Pty Ltd (ABN 87 160 801 329)
X-Five Pty Ltd (ABN 84 146 308 876)
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X-Team Global Pty Ltd (ABN 99 670 499 224)

MODERN SLAVERY ACT 2018 (CTH) Statement

Annexure

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of the reporting entities making up the **Group**, as defined by the Modern Slavery Act 2018 (Cth)¹ (“the Act”) on 22 July 2026.

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of each of the reporting entities making up the **Group**, as defined by the Act²:

David Nigel Rosen, sole director of each of the reporting entities making up the Group

Mandatory criteria

The following table indicates the page number/s of this statement that address each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	1
b) Describe the reporting entity's structure, operations and supply chains.	2 - 6
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	7
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	8 - 9
e) Describe how the reporting entity assesses the effectiveness of these actions.	10 - 11
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	12
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	12

1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if

the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.