

HUB 24

Empowering
better financial
futures, **together**

Modern Slavery
Statement **2025**



HUB24

Modern Slavery Statement 2025

Our Modern Slavery Statement is a Joint Statement made by HUB24 Limited on behalf of HUB24 Custodial Services Ltd, which is also a reporting entity.

In this Joint Statement, the expression 'we', 'us', 'our', 'the Group' and 'HUB24' refer to all reporting entities covered by the Statement. Unless otherwise noted, we operate under group-wide policies and procedures to assess and address modern slavery risk.

The Statement is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) and outlines the actions taken by HUB24 to identify and mitigate the modern slavery risks in our value chain during the financial year ending 30 June 2025, as well as our ongoing commitment to continuous improvement.

References to 'modern slavery' follow the definitions in the *Modern Slavery Act 2018* (Cth), including 'slavery', 'servitude', 'forced or compulsory labour', and 'human trafficking'.

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A message from our Managing Director & CEO

Welcome to HUB24's Modern Slavery Statement for FY25, detailing our progress in managing modern slavery risks across our operations, people and supply chains.

Andrew Alcock
Managing Director & CEO, HUB24 Limited



At HUB24, our purpose is empowering better financial futures together. This commitment extends beyond financial outcomes to include respect for human rights and the ethical conduct of business. As we present our Modern Slavery Statement for FY25, we reflect on the evolving landscape of modern slavery risk and our role in addressing it.

Modern slavery remains a pervasive global issue and can result in significant and lifelong harm for victims and survivors. The estimated US\$236 billion in annual illegal profits¹ generated from forced labour not only incentivises further exploitation, but also strengthens organised criminal networks, fosters corruption, and undermines the rule of law, underscoring the urgency of action and the importance of robust corporate responses.

The 2025 financial year marked a pivotal year for modern slavery regulation in Australia. The Federal Government released its response to the independent review of the *Modern Slavery Act 2018* (Cth), including proposals for civil penalties, mandatory human rights due diligence, and expanded reporting requirements. The appointment of Australia's first Anti-Slavery Commissioner signals a shift from transparency to accountability.

In this context, HUB24 reaffirms its commitment to the UN Global Compact and the UN Sustainable Development Goals, embedding modern slavery risk management across our operations, supply chains, and partnerships. We have invested in internal capabilities in Procurement and Sustainability to strengthen our policies, processes, and workforce education.

This Statement outlines our progress and future direction. It reflects our belief that ethical business practices are foundational to sustainable growth and stakeholder trust. We remain committed to continuous improvement and to playing our part in the broader movement to eliminate modern slavery.

A handwritten signature in black ink, appearing to read 'Andrew Alcock', written over a light blue horizontal line.

Andrew Alcock
Managing Director & CEO, HUB24 Limited

This statement was approved by the HUB24 Limited Board on 20 November 2025.

1. International Labour Organisation 2023, Profits and poverty: The economics of forced labour, p13.

Our structure, operations, and supply networks

Our Structure

HUB24 Limited (HUB24, the Group or the Company) is a financial services company that was established in 2007 and is a leading provider of integrated platform, technology and data solutions to the Australian wealth industry. HUB24 Custodial Services Ltd (HUB24 CS) is a wholly owned subsidiary of HUB24 Limited and operates as the platform operator and administrator for HUB24's investment and superannuation services within the Platform Services segment.

We operate our business under the following brands:



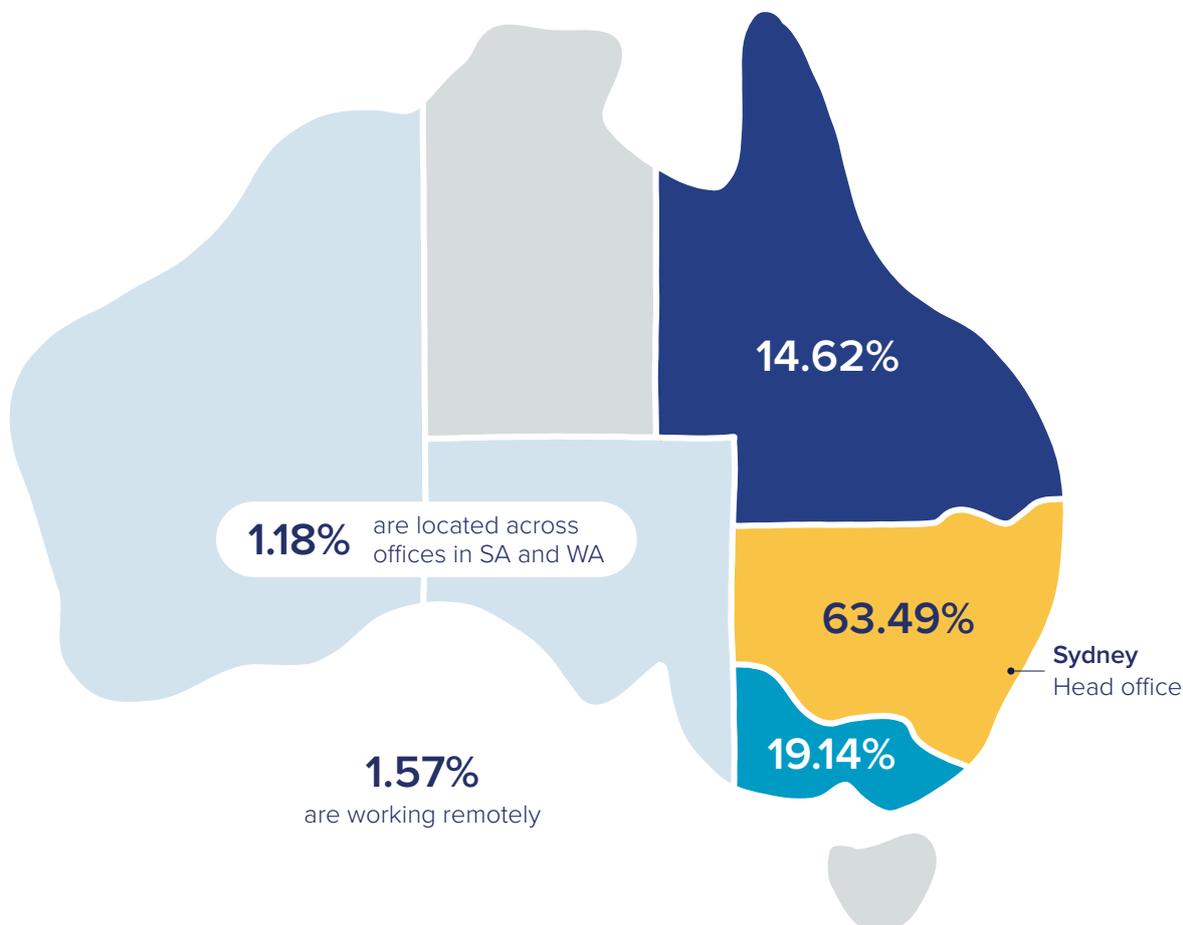
Our online products and services are offered and supplied in Australia. Our customers can access our online platform both in Australia and globally.

Our Operations

Our core operations are performed from our registered offices located at Level 17, 5 Martin Place, Sydney NSW 2000 and Level 20, 580 George Street, Sydney NSW 2000.

As at 30 June 2025, the HUB24 Group employed 996 people on a full-time equivalent (FTE) basis (FY24: 893). Approximately 46% of our people are dedicated to product innovation, technology, and customer service. Our workforce consists of employees on permanent, fixed-term, and casual contracts, with around 89% employed on a permanent basis.

Our people are situated nationally, with our Head Office located in Sydney.



Our structure, operations, and supply networks



Platform

The Platform segment comprises the HUB24 investment and superannuation platform (HUB24 platform), Portfolio Administration & Reporting Services (PARS) and myprosperity.

HUB24 platform

The HUB24 Group is an issuer of financial services products including the HUB24 platform, which is used by financial professionals to efficiently administer, invest and report on their clients' assets. The HUB24 platform offers a comprehensive range of investment products to suit individual client needs through superannuation or other legal structures.

As one of the fastest growing platform providers in the market, the HUB24 platform is recognised for providing choice and innovative product solutions. It offers financial professionals and their clients a comprehensive range of investment options, including market leading managed portfolio solutions, and enhanced transaction and reporting functionality.

PARS

HUB24 also offers PARS, a non-custody portfolio service which provides administration, corporate action management and tax reporting services for financial professionals and their clients with a 'whole of wealth' view of their assets.

myprosperity

myprosperity is a leading provider of client portals for accountants and financial professionals. The all-in-one secure portal delivers a total view of household wealth, making it easier for households to collaborate with their financial professionals across all aspects of their financial lives. myprosperity's client portal is used by 531 accounting and financial advisory firms, representing circa 107,000 households¹.



Tech solutions

The Tech Solutions segment comprises Class, NowInfinity and HUBconnect.

Class and NowInfinity

Class delivers trust accounting, portfolio management, legal documentation, corporate compliance and SMSF administration solutions to around 6,500 customers² across Australia who utilise Class to drive business automation, increase profitability and deliver better client service.

Class's core offering is self-managed superannuation fund (SMSF) administration software. Its solutions have gained industry recognition for product innovation and customer service excellence.

Customers using the Class Super, Class Portfolio and Class Trust solutions represented circa 216,000 accounts as at 30 June 2025.

NowInfinity operates in the legal entity document and corporate compliance segments.

HUBconnect

HUBconnect provides technology and data services to the wealth industry, delivering innovative solutions to enable financial professionals to efficiently run their businesses and service their clients.

HUBconnect leverages data and technology capability to provide solutions that solve common challenges faced by stockbrokers, licensees and professional advisers in the delivery of financial advice.

HUBconnect Broker has a long history of working with stockbrokers to deliver innovative business reporting and support tools. HUBconnect Broker streamlines and integrates client data and connects to a range of broking business reporting and back-office support tools that provide key insights and enable the efficient delivery of stockbroking operations.

For financial advisers and licensees HUBconnect utilises innovative technology such as machine learning, artificial intelligence, and natural language processing. HUBconnect integrates, refines, stores and supplies structured and unstructured data.

Through integrated data feeds, automated reporting and analytics, HUBconnect delivers efficiencies for some of the time-consuming and costly processes that increase the cost of delivering advice. HUBconnect serves a growing number of respected and high profile financial services companies and their clients.

1. HUB24 data as at June 2025.

2. Class service providers represents practices of accountants, administrators and advisers as at 30 June 2025.

Our structure, operations, and supply networks

Corporate

The Corporate segment comprises Group support functions together with the following strategic investments:

- The HUB24 Group is a strategic shareholder in Count (ASX:CUP), a diversified financial services business providing integrated accounting and wealth management services to the Australian market. The HUB24 Group has a minority shareholding of 11.79% in Count (FY24: 11.55%).
- On 26 September 2024, the HUB24 Group became a strategic shareholder in WeReach Alternatives Pty Ltd (Reach), an alternatives-focused platform that provides access to global private equity and credit funds. The HUB24 Group has a minority shareholding of 11.33% in Reach.

As these are minority, non-managing stakes, these entities are not included as part of this statement.

Our Supply Network

Our business is primarily office-based encompassing hybrid working arrangements for Our People. The types of goods and services we procure are mainly in relation to the HUB24 Platform Service. Our supplier arrangements range from one-off purchases with non-contracted suppliers through to multi-year, large value strategic partnerships governed by supplier contracts. Across these main supplier categories, we have identified more than 500 suppliers that support us in operating our business.

Whilst these suppliers are primarily located in Australia, we also work with suppliers based in other countries, including the United States of America, the United Kingdom, Ireland, India, Israel, Macedonia, The Netherlands, Philippines and Vietnam.

Our major categories of supplier and third-party spend include:



Professional Services



IT and Technology



Recruitment



Property and Operations



Financial Services

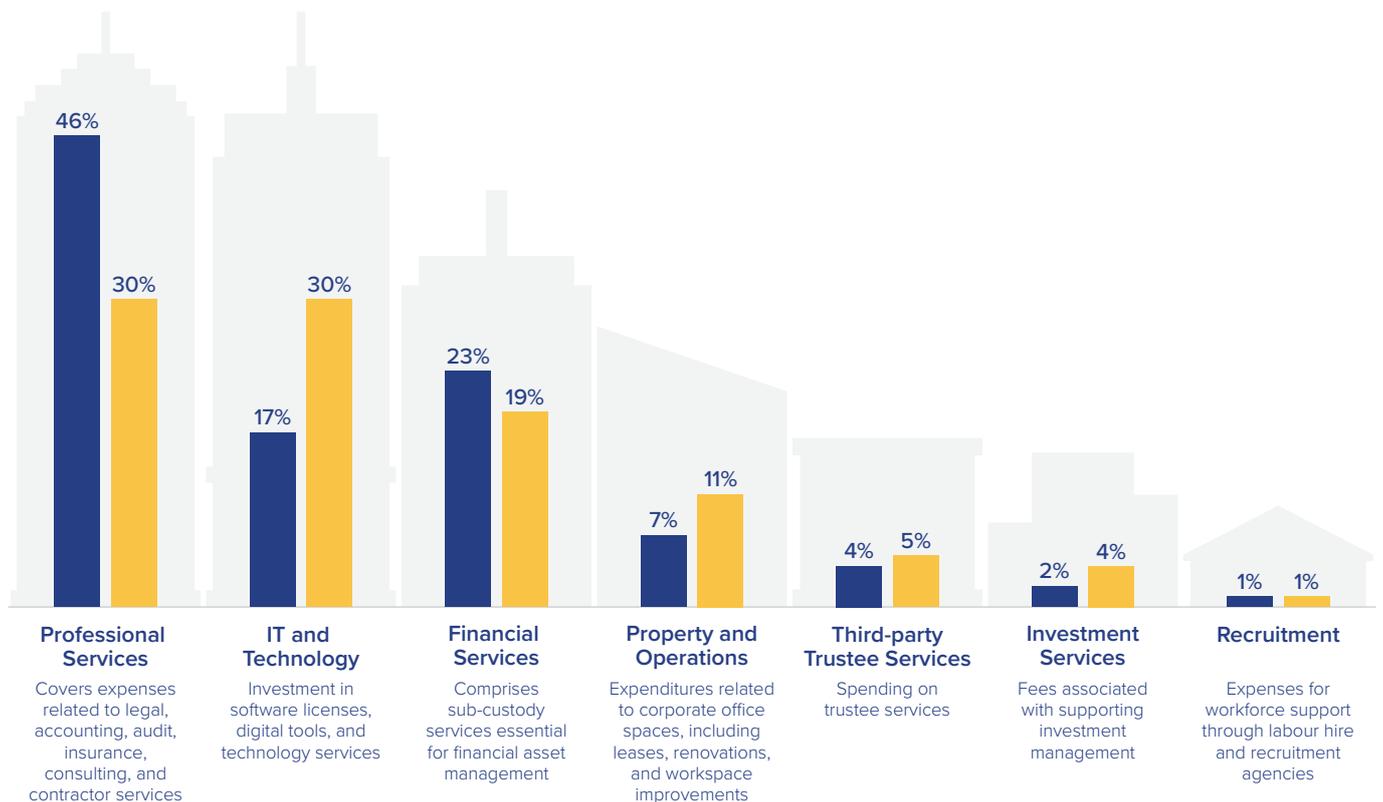


Third-party Trustee Services



Investment Services

Our total supplier and other third-party spend in FY25 across the following categories has been:



● % of spend FY24 ● % of spend FY25¹

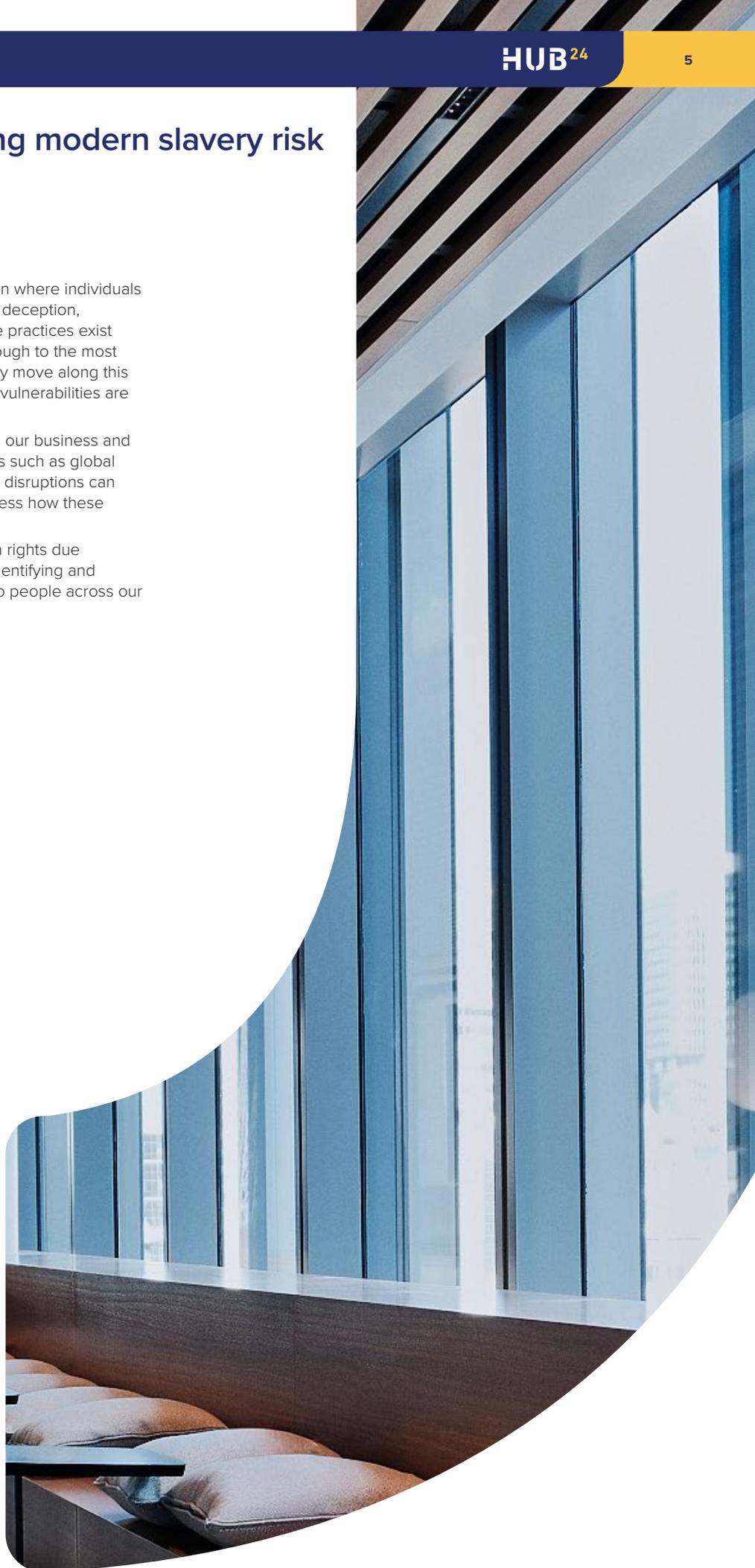
1. Percentage figures shown represent the proportion of total supplier spend, not total organisational spend for FY24 and FY25.

Identifying and assessing modern slavery risk

Modern slavery involves situations of exploitation where individuals cannot refuse or leave due to threats, coercion, deception, abuse of power, or other forms of control. These practices exist on a spectrum, from less visible labour risks through to the most severe forms of human rights abuse. People may move along this spectrum over time, and those with heightened vulnerabilities are at greater risk of exploitation.

For HUB24, modern slavery risks may evolve as our business and operating environment changes. External factors such as global conflicts, economic pressures, and supply chain disruptions can also increase risk exposure. We continue to assess how these dynamics may impact our risk profile.

Given these challenges, our approach to human rights due diligence and risk management is focused on identifying and addressing the areas of greatest potential risk to people across our operations and supply chains.



Identifying and assessing modern slavery risk

Our risk identification and assessment processes

The processes we use to identify and assess our modern slavery risks are specific to the various roles we play as a platform provider. The diagram below outlines our general approach:



Identifying and assessing modern slavery risk

Our Policy Framework

Our frameworks and policies provide the foundation for identifying and managing risks across our business and supply chain supporting our human rights commitments. Key policies include:

Risk Management Framework



This framework describes HUB24's approach to managing Material Risks. Key elements of the RMF include our Corporate Strategy and Business Plan, our Risk Appetite, and our approach to managing, monitoring, and responding to Material Risks.

Code of Conduct



Articulates the values and principles we expect our people to adhere to when performing their responsibilities.

Group Recruitment Due Diligence Policy



This Policy ensures we conduct thorough due diligence checks on prospective employees to assess their suitability and integrity for employment within our organisation, consistent with legal obligations and Code of Conduct.

Group Vendor Management Framework



Our approach to ensure our Vendor relationships are entered into, managed, and exited in accordance with our Risk Appetite and in a manner that aligns with our purpose and values, and our legal and regulatory obligations.

Whistleblower Policy



Our standards and expectations for our people to confidentially report behaviours or instances that are not in accordance with our Code of Conduct, procedures, processes and regulatory requirements.

Anti-Bribery & Corruption Policy



Our Anti-Bribery and Corruption Policy prohibits HUB24 Directors and our people from engaging in activity that constitutes bribery, corruption and facilitation payments and provides guidance on how to recognise and deal with bribery and corruption issues.

Group Sanctions Policy



Our minimum standards for ensuring compliance with our economic and trade sanctions obligations.

AML/CTF Program



Our approach to managing anti-money laundering, terrorist-financing and sanctions risk.

HUB24 Advice AFSL Governance Framework



Our approach to managing risks associated with advice licensees, including oversight.

Grievance Handling Policy



Our approach to fairly managing grievances.

Information Security Policy for Supplier Relationships



Our minimum standards for supplier security arrangements.

Group Donations Policy



Our approach to managing Non-Political and Political Donations.

Identifying and assessing modern slavery risk

Determining our modern slavery risk profile

We apply the UNGPs, together with the modern slavery risk types sourced from Australia's *Modern Slavery Act 2018* (Cth) guidance to our key business operations to determine how modern slavery risks may arise in our business and our what our modern slavery risk profile is. Our assessment of our FY25 modern slavery risk profile is summarised below:

| Identified modern slavery risk types | Our capacity as an employer impacting Our People | | | Our capacity as a procurer of goods & services | | | Our capacity as an issuer of financial products/services in the Australian market | | | Our capacity as a service provider to a third-party issuer of financial products/services in the Australian market | | |
|---|--|------------|-----------------|--|------------|-----------------|---|------------|-----------------|--|------------|-----------------|
| | Cause | Contribute | Directly linked | Cause | Contribute | Directly linked | Cause | Contribute | Directly linked | Cause | Contribute | Directly linked |
| Deceptive recruiting for labour or services | ● | ● | ● | No | ● | ● | No | ● | ● | No | ● | ● |
| Slavery | ● | ● | No | No | ● | ● | No | ● | ● | No | ● | ● |
| Forced labour | ● | ● | No | No | ● | ● | No | ● | ● | No | ● | ● |
| Debt bondage | No | No | No | No | ● | ● | No | ● | ● | No | ● | ● |
| Human trafficking | No | No | No | No | ● | ● | No | ● | ● | No | ● | ● |
| Child labour/exploitation | No | No | No | No | ● | ● | No | ● | ● | No | ● | ● |
| Worst forms of child labour | No | No | No | No | ● | ● | No | ● | ● | No | ● | ● |
| Forced marriage | No | No | No | No | ● | ● | No | ● | ● | No | ● | ● |
| Overall risk profile | Low | | | Medium | | | Low | | | Low | | |

Identifying and assessing modern slavery risk

Potential modern slavery risks across our business

We assess and manage the risk of modern slavery as it relates to our various roles through our business operations

Modern slavery risk in our operations



HUB24's Capacity as an Employer (Impacting Our People)

Risk Profile: Low

HUB24 does not consider it is likely to cause or contribute to modern slavery as an employer. As HUB24 operates in Australia, governed by strong employment laws and ethical practices, there is a low risk of modern slavery within our workforce. The majority of HUB24's workforce is employed on permanent, fixed-term and casual contracts and on a permanent basis with individual employment contracts. However, risks could arise indirectly through vulnerable populations, such as contractors or temporary staff in outsourced services like office cleaning or catering. This risk is captured in our risk profile as a procurer of Goods and Services.



HUB24's Capacity as a Procurer of Goods and Services

Risk Profile: Medium

We recognise we could be directly linked to a range of modern slavery risks through our suppliers, including for both goods and services, from suppliers with components that are manufactured or sourced using forced labour, the worst forms of child labour or other forms of modern slavery. We could also be connected to modern slavery if we procure services from suppliers (including contractors, outsourced and offshore service providers) that exploit their workers, including temporary visa holders, children and young people, low skilled workers or other vulnerable workers.



HUB24's Capacity as an Issuer of Financial Products and Services and as a Service Provider to Third-Party Issuers

Risk Profile: Low

HUB24's operations encompass both our role as an issuer of financial products and services, and as a service provider to third-party issuers, including investment managers and financial advice licensees who access investments via our platform. While our direct exposure to modern slavery risk remains limited, we recognise indirect risks may arise from the sectors, industries, and geographic regions in which our partners operate, as well as their organisational practices and labour forces.

Modern slavery risk in our supply network

We have established a Modern Slavery Risk Assessment Methodology for our suppliers which considers a number of indicators of modern slavery risk including sector and industry, the type of products and services, geographical location and specific entity risk. Overall, and based on our assessment, our Supply Network Modern Slavery Risk Profile is low. Our assessment of our FY25 Modern Slavery Risk Profile as it applies to our Suppliers is summarised in the table below:

| Risk exposure by: | Rating | Risk Management Comments |
|------------------------|--------|--|
| Sector/Industry | Low | The large majority of suppliers were assessed as falling within the professional and financial services industry in Australia. These sectors typically carry a low level of risk associated to modern slavery practices. Other sectors and industries include IT and technology and property & operations. |
| Product/Service | Low | Risks associated with a specific product or service were assessed as low for the period. This is predominantly as a result of the profile of our core suppliers who specialise in technology, software, financial services, and professional services. We have minimal exposure to suppliers with cyclical production and/or high-risk raw material usage to manufacture the products and services that we consume. |
| Geographic | Low | The large majority of suppliers are headquartered in Australia, and as such our geographic exposure risk to modern slavery practices during the period was deemed low. The remaining portion of suppliers are predominantly based in the USA, United Kingdom and Europe. During FY25, there were no suppliers identified that were headquartered in 'high risk' ¹ jurisdictions. |
| Specific Entity | Low | There were no specific entities identified during the period that we deemed as having significant risks associated with modern slavery practices. |

1. Global Slavery Index 2023 published by the Walk Free Foundation.

Actions taken to address modern slavery risks

During FY25, we took a range of actions to help improve our modern slavery approach:

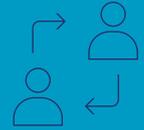
REVIEWED KEY PERFORMANCE INDICATORS



Review of Group Executive KPIs confirmed the inclusion of modern slavery measures.

UPDATED VENDOR MANAGEMENT PROCESSES

Embedded our updated Vendor Management Framework into all business owner contract approvals.



STRENGTHENED GOVERNANCE OVERSIGHT

Modern slavery is now a standing agenda item at HUB24's Sustainability Council.

DEDICATED ESG CAPABILITY



Established a dedicated ESG role to oversee and advance our sustainability strategy, including modern slavery risk policies and processes.

PROCUREMENT UPLIFT



Appointed a Head of Procurement to strengthen vendor management, including modern slavery risk management across our supply chain.

UPLIFTED INVESTMENT GOVERNANCE

Uplifted investment governance for onboarding investment managers by including modern slavery in all due diligence questionnaires.

UPLIFTED ADVICE GOVERNANCE FRAMEWORK

Strengthened advice governance framework with a risk-based focus to improve oversight and compliance

Training and awareness for employees

HUB24 has a dedicated modern slavery module as part of its annual mandatory training for all employees. This training helps employees understand what modern slavery is, how to recognise risks and educates them on the appropriate steps for reporting suspected cases. This training is an essential part of our compliance framework and are designed to ensure employees understand our policies and the measures we take to mitigate modern slavery risk.

In FY25, the completion rate of this training was 100% for the reporting period.

Supplier due-diligence and assessment

At HUB24, we implement a supplier due diligence process, conducting screening for service providers and new suppliers before finalising agreements. Our procurement and purchasing procedures include third-party vendor management to support compliance with modern slavery standards.

We have a Information Security Policy for Supplier Relationships outlining requirements for engaging suppliers providing systems, components, or services. Within Group Technology, we leverage a specialised IT procurement capability. Each supplier is assigned a Business Owner responsible for managing the contractual relationship, and all suppliers are bound by formal contracts that include obligations to comply with Modern Slavery Laws. These contracts require suppliers to implement measures to ensure compliance and notify HUB24 of any breaches.

Actions taken to address modern slavery risks

Case Study



Strengthening Supplier Oversight through Procurement

In Q4 FY25, HUB24 appointed a new Head of Procurement to lead the ongoing enhancement of our supplier governance and oversight. Since joining, the Head of Procurement has been working closely with teams across the business to:

- Rationalise and consolidate supplier relationships to reduce duplication and strengthen controls.
- Embed consistent processes for supplier engagement and monitoring through the Vendor Management Framework.
- Enhance the quality and transparency of supplier data to support better risk identification and management.
- Develop a risk based supplier tiering and criticality model in collaboration with Group Technology, with implementation planned following the finalisation of vendor governance guidelines.
- Foster cross - functional collaboration to ensure procurement practices align with operational needs, risk management, and sustainability objectives.

Outcome: This program of work is streamlining and standardising the Vendor Management processes across HUB24 and will strengthen our ability to identify and manage modern slavery risks within our supply network, while also improving efficiency and transparency in procurement. The findings of this work will be reflected in the FY26 Modern Slavery Statement.

Case Study



Investment manager due-diligence and managed portfolios

In FY25, HUB24 enhanced its Investment Manager due diligence processes by adding a dedicated modern slavery question to all due diligence questionnaires for new investments options added to the HUB24 Platform. This change seeks to understand the coverage of investment managers that have procedures and controls in place to identify, investigate, and address the risks and instances of modern slavery in the manager's business activities. HUB24 expects to use this information to further understand the practices of investment managers and develop further measures and activity metrics.

For our range of Managed Portfolios, HUB24's template contract terms were previously updated to contain modern slavery clauses for new portfolio managers.

Actions taken to address modern slavery risks

Advice licensee governance

As part of HUB24's compliance monitoring program, all advice licensees using the HUB24 platform are sent an annual compliance attestation. The attestation includes a range of statements across several categories, including modern slavery. Our contracts (LRA's) also include provisions relating to modern slavery. This initiative not only raises awareness of modern slavery risks and encourages licensees to review and enhance their own controls but also provides HUB24 with valuable insights into how these risks are being managed across our network.

Financial Crime and Compliance

HUB24 and its business activities are subject to a range of financial crime laws and regulations, including anti-money laundering and counter-terrorism financing (AML and CTF) as well as restrictions relating to sanctions and other criminal activity.

We have processes in place that screens transactions and compares the identifying details of our customers against intelligence lists of sanctioned persons and people convicted of crimes, such as human trafficking. The transaction monitoring capability uses algorithms to identify unusual transactional patterns (for example as might be adopted by people convicted of crimes such as human trafficking) that require further investigation and escalation to regulators.

Industry Engagement and collaboration

Given the complexity of modern slavery, HUB24 recognises the importance of collaboration and enhancing practices in addressing risks across our Industry. We are members of several key bodies that have working groups dedicated to progressing Sustainability and Environment, Social and Governance (ESG) practices, including human rights and modern slavery. These include:

- Financial Services Council (FSC)
- United Nations Global Compact Australia (UNGCA)
- Responsible Investment Association of Australasia (RIAA)

Grievance mechanisms and remediation

HUB24 offers access to remedy where appropriate and maintain mechanisms for raising grievances and complaints, including those related to modern slavery. When an issue is identified, it is managed through our Incident and Breach Management processes, as well as our grievance and whistleblower channels.

HUB24's Whistleblower Policy provides a channel for people to report eligible concerns relating to misconduct at HUB24. It ensures that individuals who disclose misconduct or potential misconduct can do so safely and securely, and with confidence that they are protected and supported. The policy applies to current or former employees, suppliers of services or goods to HUB24, including their employees as well any relatives of these persons.

In 2025, and since the *Modern Slavery Act 2018* (Cth) came into effect, HUB24 has not identified any confirmed cases of modern slavery through its Incident and Breach Management processes or its whistleblowing channels.

Supporting the United Nations Global Compact

HUB24 remains committed to the Ten Principles of the United Nations Global Compact, which cover human rights, labour, environment and anti-corruption. In June 2025, we reaffirmed our commitment to embedding these principles into our strategy, culture and daily operations, and to engaging in collaborative initiatives that support the United Nations' broader development agenda, particularly the Sustainable Development Goals (SDGs).

[View more information.](#)



WE SUPPORT

Governance and risk management

HUB24 is committed to high standards of corporate governance and risk management, adopting the ASX Corporate Governance Principles and Recommendations (4th Edition). Our governance arrangements are set out in our [Corporate Governance Statement](#), and our approach is detailed in our annual [Sustainability Report](#).

The following Board and management governance structures are established and operate to manage our modern slavery risk exposure:

Oversight



HUB24 Limited Board

Reviews and approves HUB24's Modern Slavery Statement, oversees performance, governance frameworks, and culture.

HUB24 Audit, Risk and Compliance Committee

Oversees the Risk Management Framework, modern slavery risk management and recommends the Modern Slavery Statement for Board approval.

Sustainability Council

Oversees HUB24's approach to sustainability and modern slavery. The Council works to embed sustainability considerations across operations and monitors progress against the Group's sustainability and human rights goals.



Management and execution



Executive Leadership Team

Accountable for modern slavery risk management within their business lines under the Risk Management Framework (RMF).

Chief Financial Officer (CFO)

Responsible for procurement and sustainability initiatives across the business, including oversight of the Group's supplier expense management policies and procedures.

Chief Operating Officer (COO)

Responsible for the Group's operations including our Vendor Management Framework.

Chief Risk Officer (CRO)

Responsible for the Risk Management Framework (RMF), which underpins the risk management approach to Modern Slavery.

Our People

Responsible for identifying, assessing and escalating risks as part of daily operations.

Governance and risk management

Our Risk Governance

HUB24's Board approved Risk Appetite Statement (RAS) and Risk Management Framework (RMF) define the Group's approach to managing risk. These documents ensure the alignment of risk management practices with the Group's strategic objectives, emphasising the importance of addressing modern slavery risks at every level of the organisation.

The RMF is built around seven key components, designed to provide a comprehensive and structured approach to risk management. It aligns with leading industry standards, such as APRA's Prudential Standard CPS 220 Risk Management and the International Standard ISO 31000 Risk Management – Guidelines. At the core of HUB24's framework is a commitment to acting in the best interests of our customers. By proactively managing risks, we aim to deliver fair and effective outcomes that uphold our values and build trust.

To strengthen risk oversight, HUB24 uses a Board-approved Risk Taxonomy to classify and categorise material risks. Sustainability risk, which includes human rights and modern slavery risk, is recognised as one of the Group's eleven material risks. This recognises its potential impacts on the organisation and ensures that it is prioritised and addressed effectively.

The Chief Risk Officer (CRO) plays a pivotal role in overseeing the management of modern slavery risk. This involves embedding our organisation's risk governance and ensuring robust strategies are implemented to mitigate them. Each Group Executive is accountable and responsible for managing modern slavery risk within their area of responsibility in accordance with the RMF.

Our Approach to Risk Management

HUB24 adopts the Three Lines of Accountability model to clearly define roles and responsibilities in managing risk. This model empowers all Our People to understand their role in risk management (see table below). The Managing Director and Group Executive are accountable for implementing the Group's strategy and managing impacts on its risk appetite and profile. Supporting them, the Group Risk & Compliance function provides independent monitoring, assessment, and insights to ensure effective governance and decision-making.

| Three Lines of Accountability | Responsibilities |
|------------------------------------|--|
| Internal Audit | <ul style="list-style-type: none"> Audit is the Third Line assurance function that provides the Board and the Group Executive with an independent evaluation of the adequacy and effectiveness of the Group's governance, risk management and control environment. |
| Group Risk & Compliance | <ul style="list-style-type: none"> The Second Line sets frameworks, policies and standards for use across the Group and can require the cessation or modification of an activity where these are not followed. The Second Line also reviews First Line activities and decisions that may materially affect HUB24's risk position and independently evaluates the effectiveness of the First Line's management of risk including controls. The Second Line provides insight to the First Line, assisting in developing, maintaining and enhancing the first line's approach to risk management and consider and reports on the Group Risk Profile. |
| Business Units | <ul style="list-style-type: none"> The First Line proactively identifies, evaluates, owns and manages the existing and emerging risks in their business. It manages business activities within approved risk appetite and policies. In managing its risk, the First Line establishes and maintains appropriate governance forums and controls to ensure issues and risk are monitored and/or escalated. |

Assessing our effectiveness and performance

Assessing the effectiveness of our actions is critical to driving continuous improvement in our approach to modern slavery risk. HUB24 has identified several metrics to assist in tracking our performance across our key activities.

We monitor Advice Licensee compliance attestations, modern slavery training completion rates, as well as any matters raised through our grievance channels as indicators of the effectiveness of our response to anti-modern slavery.

| Effectiveness measure | FY2024 | FY2025 |
|--|--------|-------------|
| Our People¹ | | |
| Completion rate for Modern Slavery Awareness module by HUB24 employees | 100% | 100% |
| Completion rate for Whistleblower Protection training by HUB24 employees | 100% | 100% |
| Reported incidents of modern slavery through internal employee grievance channel | 0% | 0% |
| Our Operations, Partners, & Customers | | |
| Reported incidents of modern slavery through incident & breach reporting | 0% | 0% |
| Reported incidents of modern slavery through the whistleblower process | 0% | 0% |
| Our Suppliers | | |
| Exceptions identified in annual Advice Licensee compliance attestations related to Modern Slavery risk | 0% | 0% |

1. Mandatory training covers all HUB24 employees, including permanent and fixed term contractors and casuals. The percentage completion figure includes all employees who completed training in the previous 12 months by their due date and excludes employees on extended leave and new starters with one month or less tenure.

Continuous improvement and future focus

We aim to continuously review and enhance our approach to managing modern slavery risk in our operations and supply chain where we have reasonable control. We have identified the following continuous improvement initiatives to help drive meaningful change:

Continuous improvement initiatives

- **Training:** Review and refine our modern slavery training module to continue to drive awareness and education.
- **Risk Management:** Develop modern slavery Key Risk Indicators (KRIs) through our Risk Management Framework and report to our Audit Risk and Compliance Committee.
- **Investment managers:** Continue refining our approach to managing modern slavery risks with investment managers and responses to due diligence questionnaires.
- **Supplier engagement:** Review and continue to strengthen our ongoing supplier due diligence activities across high-risk categories, through supplier rationalisation and cross functional collaboration.
- **Industry partnerships:** Work with industry groups on policy developments and good practice implementation of processes to address modern slavery risks.

Consultation & approval

The HUB24 Group Chief Risk Officer, supported by the HUB24 Group Risk & Compliance function led the preparation of this Statement. The Group Risk & Compliance function consulted cross-functionally in the preparation of this Statement, including with relevant members of the HUB24 Group Executive and directors of HUB24 Custodial Services Ltd, which is a reporting entity under the *Modern Slavery Act 2018* (Cth). This Statement for HUB24 Limited was approved by the Board of HUB24 Limited on 20 November 2025 as the parent entity and tabled for noting at relevant Subsidiary Board Audit Risk and Compliance Committees.

Appendix A – Reporting entities and subsidiaries

This joint statement has been prepared to comply with the reporting requirements under the *Modern Slavery Act 2018* (Cth).

Reporting entities for the 12 months to 30 June 2025:

- HUB24 Limited (ABN 87 124 891 685)
- HUB24 Custodial Services Ltd (ABN 94 073 633 664)

The subsidiaries of HUB24 during FY25 included:

- HUB24 Management Services Pty Ltd ABN 59 135 332 320
- HUB24 Administration Pty Ltd ABN 63 126 560 923
- Firstfunds Pty Ltd
- HUBconnect Pty Ltd ABN 80 140 899 252
- Agility Applications Pty Ltd ABN 76 124 078 315
- Xplore Wealth Pty Limited ABN 34 128 316 441
- Xplore Business Services Pty Ltd ABN 56 128 328 754
- Investment Administration Services Pty Limited ABN 86 109 199 108
- Margaret Street Financial Holdings Pty Ltd ABN 87 118 723 023
- Margaret Street Administration Services Pty Ltd ABN 63 163 681 678
- Margaret Street Promoter Services Pty Ltd ABN 23 153 446 210
- DIY Master Pty Ltd ABN 41 123 035 245
- Class Pty Limited ABN 70 116 802 058
- Class Technology Pty Limited ABN 46 121 158 503
- Class Investment Reporter Pty Ltd ABN 84 153 194 622
- NowInfinity Pty Ltd ABN 16 54 927 376
- NowInfinity 3505 Pty Ltd
- myprosperity Pty Ltd ABN 40 149 786 489
- myprosperity Aust Pty Ltd ABN 58 155 242 185

Please refer to Page 76 of the HUB24 Annual Report year ending 30 June 2025 for further details of the owned and controlled entities within the HUB24 Group.

Appendix B – How our statement addresses the mandatory criteria

The table below provides reference pages for the relevant disclosures in each criterion for the *Modern Slavery Act 2018* (Cth).

| Australian Modern Slavery Act (Cth) mandatory criteria | FY25 Modern Slavery Statement section reference |
|--|---|
| Section 16(1)(a) Identify the reporting entity | Introduction |
| Section 16 (1)(b) Describe the structure, operations, and supply chains of the reporting entity | Our structure, operations, and supply chains |
| Section 16 (1)(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls | Identifying and assessing our modern slavery risks |
| Section 16 (1)(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes | Actions taken to address modern slavery risks Identifying and assessing our modern slavery risks |
| Section 16(1)(e) Describe how the reporting entity assesses the effectiveness of such actions | Assessing the effectiveness |
| Section 16(1)(f) Describe the process of consultation with any entities that the reporting entity owns or controls. In the case of a reporting entity covered by a statement under section 14 -the entity giving the statement | Consultation & Approval |
| Section 16(1)(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant | Continuous improvement and future focus |

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