



Modern Slavery Statement

1 April 2024 – 31 March 2025

Peninsula Australia

Company Confidential

Modern Slavery Statement

The period 1 April 2024 to 31 March 2025.

Introduction

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) (Modern Slavery Act) and sets out the steps Peninsula Australia Pty Limited (ACN 145 676 026) has been taking during its financial year ending 31 March 2025 to assess and address the risks of slavery, servitude, forced or compulsory labour, debt bondage, child labour, forced marriage or human trafficking (collectively "Modern Slavery") taking part in any part of its business or supply chains.

Our Entity, Structure and Operations

Peninsula Australia Pty Ltd ("*Peninsula*", "*us*", "*we*", "*our*") is a subsidiary of Peninsula Business Services Group Limited and is part of the Peninsula group of companies, (referred to as "*the Group*"). Peninsula is controlled by a board of directors with the Peninsula head office located at Level 6, 180 Thomas St, Sydney 2000, NSW Australia.

Peninsula is one of the leading providers of employment relations and workplace health and safety advice to small to medium enterprises (*SMEs*) in Australia. Clients of Peninsula receive the additional benefit of being able to access legal services from Irwell Law. Clients also have the option to become a member of Peninsula Mutual Limited, a discretionary mutual fund that may provide protection in the event the client receives an employment relations or workplace health and safety claim.

As of 31 March 2025, Peninsula had approximately 23,800 clients in Australia and employs approximately 600 people. Additionally, any independent contractors undertaking work for Peninsula are sourced from Australia.

Commitment

As an organisation, Peninsula recognises that businesses of all shapes and sizes play an important role in respecting and promoting human rights and eradicating Modern Slavery. Peninsula is committed to tackling the challenges associated with Modern Slavery and collaborating with relevant stakeholders in line with our values of we care, we inform, we take action, we innovate, and we do the right thing.

Accordingly, we expect all who have or seek to have a business relationship with Peninsula to ensure compliance with the Modern Slavery Act and to act in a way that is consistent with Peninsula's values. Peninsula will only do business with organisations who fully comply with this statement or those who are taking verifiable steps towards compliance. If this statement is breached, Peninsula will engage with any stakeholders directly impacted by the breach to remedy any adverse impacts on workers, individuals, or communities.

1. Peninsula practices its responsibilities under the Modern Slavery Act and is committed to preventing slavery and human trafficking within its own business and in its supply chains. Peninsula understands that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains.
2. Peninsula has a zero-tolerance policy towards Modern Slavery. It will refrain from entering into business and will discontinue any current business with any other organisation which Peninsula believes may knowingly or recklessly support or otherwise involve itself in slavery, servitude and forced or compulsory labour.
3. The labour supplied to Peninsula in pursuance of the services it provides is carried out in the country where those services are provided i.e. Australia.
4. No labour provided to Peninsula in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Peninsula strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in Australia. In many cases Peninsula exceeds those minimums in relation to its employees. Peninsula ensures employees are only hired if they have existing work rights, for example by being citizens, or on a visa which allows them to work.

5. Peninsula generally offers employment contracts on a guaranteed hours basis.
6. Part-time and fixed-term employees within Peninsula are provided with the same pro-rata contractual entitlements as full-time and permanent employees.
7. Peninsula employees are offered a competitive remuneration package and Peninsula prides itself on the additional benefits it is able to offer its employees on a wide variety of platforms. It conducts staff surveys to give employees a voice on their individual employment, their department and Peninsula as appropriate.
8. Peninsula will voluntarily upload its annual Modern Slavery Statement to the Modern Slavery Statements Register for visibility and transparency.

Supply Chains

Peninsula's supply chains support the delivery of our service to our clients. In providing our services to our clients, Peninsula's day-to-day business operations involve the direct employment or engagement of workers for the provision and development of our service.

Peninsula's supply chain includes the procurement of the following types of services:

- software;
- hardware;
- marketing services;
- office suppliers;
- merchandising;
- professional services;
- car fleet suppliers;
- supermarkets; and
- events, travel and hospitality.

Potential Exposure

Peninsula has a zero-tolerance policy in relation to Modern Slavery and maintains a proactive approach in relation to preventing Modern Slavery risks as part of its day-to-day operations and through its supply chains. Peninsula has policies, processes and controls in place to identify Modern Slavery and should Peninsula be made aware of any instance of Modern Slavery it will be appropriately investigated in line with our policies with the appropriate actions being taken.

Whilst Peninsula has robust controls in place, Peninsula acknowledges the risk of Modern Slavery in its supply chain. Where appropriate Peninsula will conduct an assessment on third party providers in order to gain comfort that the third party does not engage in Modern Slavery.

Peninsula considers its risk of exposure to Modern Slavery to be low. Despite that, Peninsula has taken steps to ensure such practices do not take place within the operations of its business.

In the operation of its business, Peninsula's main supply chains are those related to the provision of its services.

Actions to mitigate Modern Slavery risk

Peninsula takes the following steps to mitigate its risk of Modern Slavery:

1. Peninsula has developed a Whistleblower Protection Policy which encourages its officers and employees to report any unlawful activity which would include concerns of Modern Slavery.
2. Peninsula will act upon reports of Modern Slavery which reference our supply chain. Once investigated Peninsula will seek to discontinue business with any supplier found by any relevant enforcement authorities or by any other legitimate source to be involved in Modern Slavery.

Assessment of effectiveness in combatting Modern Slavery

1. To ensure effectiveness in combatting Modern Slavery, Peninsula maintains an accurate supplier list including contact details. It will ensure swift, appropriate and proportionate action is taken in response to reports of Modern Slavery in its supply chains and any complaints made via the Whistleblowing Policy will be responded to in accordance with the policy.
2. Peninsula confirms its supplier list is up to date for the current financial year.
3. There have been no reports that any of Peninsula's suppliers have been involved in activities covered by the Modern Slavery Act.
4. Peninsula confirms all relevant policies and documentation are readily available and accessible to all staff.
5. Peninsula confirms that where required additional training will be provided to staff in relation to Modern Slavery.
6. Competitive Request For Proposal activities ("RFPs") led by Procurement will include an Ethical Sourcing Questionnaire with a section relating to Modern Slavery.
7. Procurement have developed an ethical sourcing self-attestation statement for issue to new suppliers – this includes a requirement for any supplier to comply in full and at all times with applicable legislation relating to Modern Slavery.

Policies

A Whistleblowing Protection Policy is in place which encourages the reporting of any wrongdoing which is in the public interest. An Ethical Sourcing Policy exists which is explicit with regard to Peninsula having an expectation of a zero-tolerance approach to Modern Slavery within its supply chains.

Director of Legal Services

Peninsula has a Director of Legal Services, to whom all concerns regarding Modern Slavery should be addressed. The Director of Legal Services undertakes ongoing review of Peninsula's obligations towards eradicating Modern Slavery within its organisation and supply chains.

Review

This statement is made in accordance and compliance of the Modern Slavery Act and constitutes Peninsula's Modern Slavery Statement for the year ending 31 March 2025.

This statement and its contents are formally acknowledged and approved by the Board of Peninsula Australia Pty Limited in its capacity as principal governing body on 22/08/2025 and signed accordingly by:



David Price, Chief Executive Officer



Anthony Rous, Chief Financial Officer



Stuart Holder, Sales Director ANZ