



ACQUIRE
INTELLIGENCE™

MODERN SLAVERY STATEMENT

2025

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) and constitutes the statement on behalf of Acquire Intelligence Pty Ltd for the fiscal year that ended 30 June 2025.

No instances of modern slavery were reported or identified across our operations or supply chain throughout the reporting period.

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Our Commitment Against Modern Slaver

Acquire Intelligence Pty (Acquire Intelligence) and its subsidiaries are firmly committed to operating with integrity and upholding the highest ethical standards across all aspects of our business. We are dedicated to implementing and maintaining robust systems and controls to prevent modern slavery in any form within our operations or supply chains.

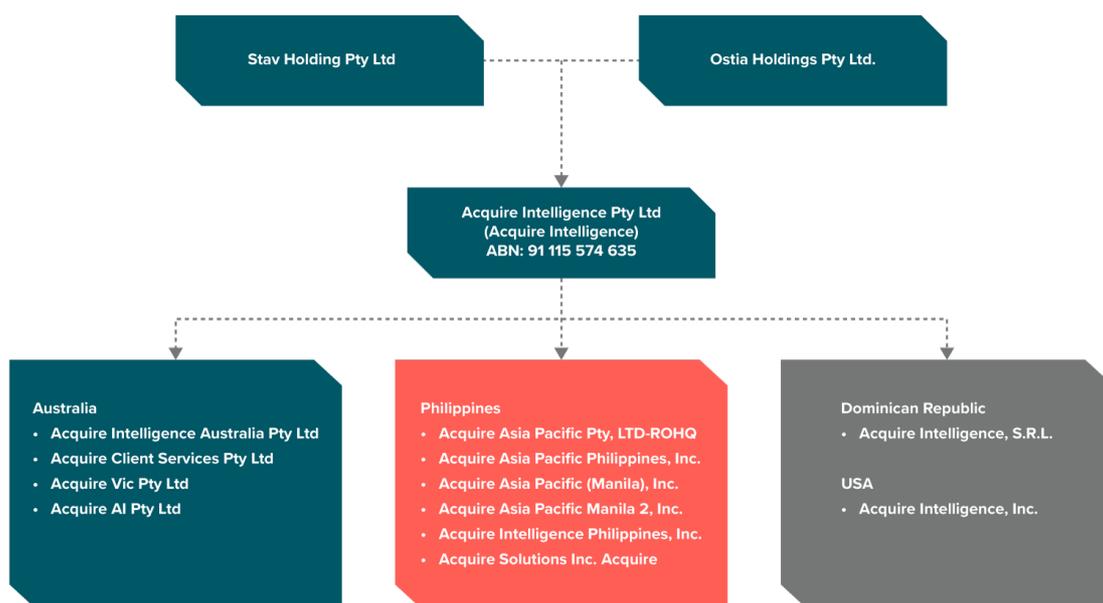
We are also committed to ensuring there is transparency in our business and our approach in addressing modern slavery is consistent with our disclosure obligations under Australian modern slavery legislation.

We expect the same high standards from our contractors, suppliers, and business partners. As part of our contracting process, we may include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude, or debt bondage, whether adults or children. We expect that our suppliers hold their partnerships to the same standards.

This Modern Slavery Statement is made by Acquire Intelligence Pty Ltd and its subsidiaries for the financial year that ended in June 2025.

Our Corporate Structure, Operations, and Supply Chain

Acquire Intelligence Pty Ltd with the brand name Acquire Intelligence is a company limited by shares, incorporated and domiciled in Australia. Acquire Intelligence is directly owned by Ostia Holdings Pty Ltd. and Stav Holdings Pty Ltd, respectively. The office headquarters and registered address is at Level 15, 10 Queens Road Melbourne, VIC 3004. Acquire Intelligence has existing subsidiaries in Australia, the Philippines, the United States of America, and the Dominican Republic.



Acquire Intelligence was founded in 2006 by two entrepreneurs in response to limited availability of high-quality offshoring solutions. Originally established as a captive environment, the business has since evolved into a full-scale outsourced contact centre and business process outsourcing (BPO) provider, experiencing consistent year-on-year growth.

Today, Acquire Intelligence employs 9000+ experienced professionals and operates from 10 state-of-the-art locations in Australia, the Philippines, the United States, and the Dominican Republic. We support a wide range of industries including telecommunications, banking & financial services, insurance, media, education, retail, legal, tech and solutions companies.

Our service offering spans customer service, sales, technical support, retention campaigns, back-office functions, software development, Artificial Intelligence, Automation and marketing service. We proudly support both private enterprises and publicly listed companies around the globe — helping them to reduce costs, improve operational performance, boost productivity and efficiency, and gain greater flexibility in staffing and workforce.

Our operations are structured and situated globally across the following locations:

Australia

- An Australian entity (Acquire Intelligence Pty Ltd) is responsible for the overall governance of the entities in the Philippines, the US, and the Dominican Republic.
- Acquire Intelligence Pty. Ltd. is responsible for the Australian operations, which also includes subsidiaries Acquire Australia Pty Ltd, Acquire Client Services Pty Ltd, Acquire Intelligence Vic Pty Ltd, Acquire AI PTY LTD

Philippines

- Philippine-based entities (Acquire Asia Pacific Pty, LTD-ROHQ, Acquire Asia Pacific Philippines, Inc., Acquire Asia Pacific (Manila), Inc., Acquire Asia Pacific Manila 2, Inc., Acquire Asia Pacific, Inc., Acquire Intelligence Philippines., Acquire Solutions Inc., are responsible for the offshore business process outsourcing services for the English-speaking market.

US and Dominican Republic

- The US entity (Acquire Intelligence Inc.) and the Dominican Republic (Acquire Intelligence SRL) are responsible for the offshore business process outsourcing service for the US and Spanish-speaking markets.



Consultation

We consulted with the entities listed above in preparing this statement by sharing details of key suppliers/ vendors and the associated spend data.

Throughout the reporting period this statement covers, we actively engaged and consulted with all companies we own or control as outlined in our corporate structure. We discussed details of the Modern Slavery Act 2018's reporting requirements; and information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

We also asked the process owners for updates on the initiatives we have implemented to mitigate the risk of modern slavery in the business. Policies and procedures that contain provisions designed to provide modern slavery controls were also reviewed and updated.

What Sets Us Apart

Our entrepreneurial approach is on being **Safe, Flexible and Innovative** whilst driving real business outcomes for our clients.



Safe

Protect clients' brands with top talent and security. Adhere to SOC, HIPAA, PCI-DSS, and GDPR standards. A-grade facilities, BCP, and workplace safety.



Flexible

Provide tailored, client solutions. Flexible operating models. Adapt swiftly to client business.



Innovative

Foster continuous improvement and innovation. Acquire automates and optimises for efficiency. Technology agnostic to ensure the best fit solution.

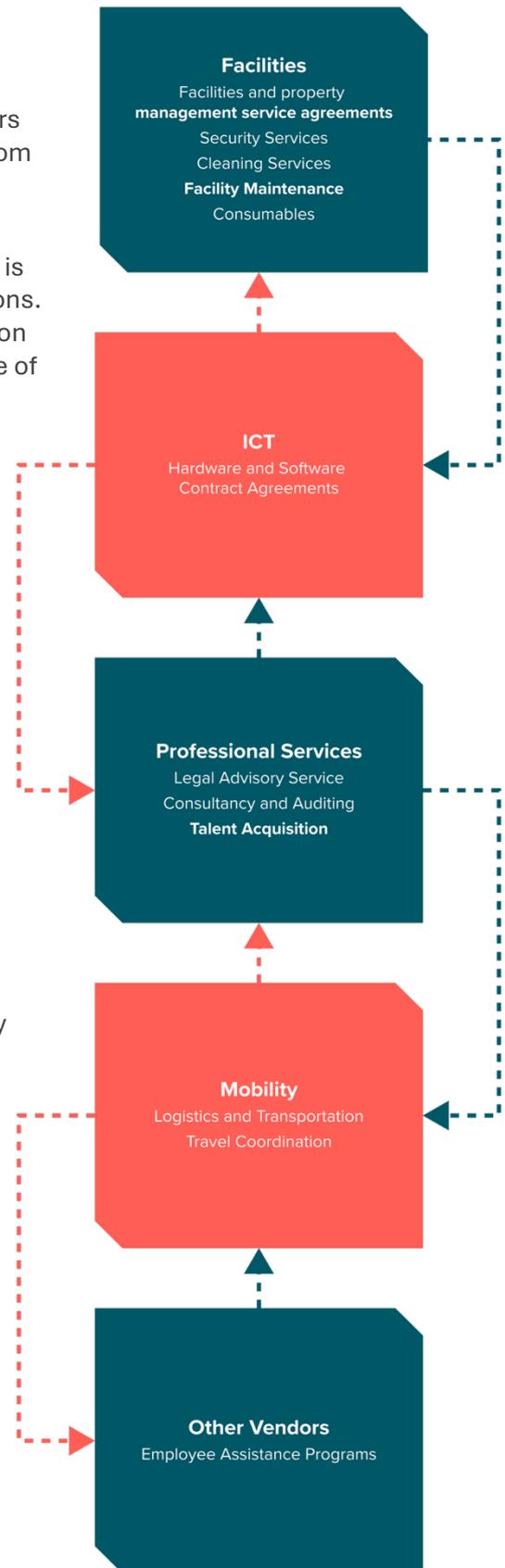
Our Supply Chains

Our supply chain involves the procurement of products and services globally and extensively across industry sectors. For the FY 2024-2025, we partner with three (3) Tier 1 Suppliers and one thousand seventy-six (1,076) third-party suppliers from different countries.

Our Finance Department undertook a comprehensive review of all suppliers to ensure that our third-party supplier registry is accurate, up to date, and reflective of current spend allocations. This review process included validating supplier categorization based on geographic location, industry sector, and the nature of goods and services provided. By maintaining a precise and well-structured supplier registry, we are better equipped to assess and address potential modern slavery risks, identify high-risk suppliers, and implement proportionate due diligence measures. This approach supports our obligations under modern slavery legislation by strengthening transparency, enabling targeted risk assessments, and reinforcing ethical and responsible procurement practices across our supply chain.

Given our size and geographic reach, ensuring we avoid any involvement in modern slavery (in particular, beyond first-tier suppliers), is a considerable challenge but we exert effort to ensure we sustain the controls we put in place in preventing modern slavery.

We have a Supplier Code of Conduct in place for all our suppliers and people working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This Code reinforces our commitment to acting with integrity and maintaining systems and controls that help prevent modern slavery within our operations and supply chains.



Risk of Modern Slavery

Slavery is a crime and a violation of fundamental human rights. It may happen in various ways, whether against adults or children, all of which have in common - the deprivation of one person's liberty by another to exploit them for personal or commercial gain. These may include servitude, forced and compulsory labor, forced marriage, debt bondage, and human trafficking.

As a business process outsourcing company, Acquire BPO / Acquire Intelligence relies heavily on hiring highly skilled professionals to support our day-to-day operations. In addition, suppliers and third-party service providers are essential to support the needs of operations. We consider our operations and supply chain to have potential modern slavery risk. The risk of modern slavery in our operations is something we can directly control whilst the risk in our supply chain is something we don't have direct control over but can be mitigated.

We consider the overall risk of modern slavery within Acquire BPO / Acquire Intelligence to be low. Our recruitment, labor relations, procurement, and compliance processes are robust and closely aligned with the local laws and regulations in each jurisdiction where we operate. We are committed to upholding human rights and make every effort to ensure that no form of exploitation occurs within our business or supply chain.

Due Diligence and Risk Management Process

Acquire Intelligence conducts an annual review of its suppliers, aligned with the financial year, as part of our due diligence efforts to address modern slavery risks. To prioritise our assessments, suppliers are categorised by spend category, and a formal risk rating is applied using insights drawn from the 2024 Global Slavery Index (Walk Free) and the International Labour Organization.

Using this risk profiling framework, we communicate our commitment to combatting modern slavery to all suppliers, contractors, and business partners at the commencement of our engagement and reinforce this message where appropriate throughout the relationship.

We have implemented a range of systems and processes to:

- Identify and assess potential risk areas within our supply chains.
- Mitigate the risk of modern slavery occurring in our supply chains.
- Monitor and review areas of potential risk; and
- Support and protect whistleblowers, including responding appropriately to any disclosures.
- Ensure that our internal hiring processes comply with applicable employment laws and are designed to prevent any form of modern slavery within our operations.

We're committed to conducting business in an open and accountable way and we expect our suppliers to:

- Act in an ethical, fair, and professional manner, both internally and externally, including with regard to how the community is affected by their business.
- Not offer gifts to gain improper advantage or preferred treatment in the supplier's business dealings.
- If possible, avoid (but always declare) any conflicts of interest that may impact commercial arrangements between the supplier and Acquire Intelligence.

We're committed to promoting a culture of health and safety awareness that ensures risks in the workplace are eliminated or controlled and we expect our suppliers to:

- Comply with all health and safety laws and regulations.
- Take proactive measures to prevent workplace risks (including providing appropriate training to enable workers to perform their jobs safely).

Preventing Modern Slavery in Our Business

Our Policy on Modern Slavery

Acquire Intelligence is firmly committed to conducting business with integrity, fairness, and respect for human rights. This policy sets out our commitment to preventing modern slavery and other forms of exploitation across all areas of our operations and supply chains. Modern slavery encompasses a range of serious human rights violations, including forced labor, human trafficking, debt bondage, servitude, and child labor. We recognise that modern slavery can occur in any country, sector or supply chain—and that businesses have a responsibility to take proactive steps to address the risk.

In alignment with the Modern Slavery Act 2018 (Cth), this policy forms part of Acquire Intelligence's broader strategy to identify, manage, and mitigate the risk of modern slavery within our business operations and the services provided by our suppliers and business partners.

We are committed to implementing and enforcing robust systems, procedures, and controls designed to:

- Prevent the occurrence of modern slavery within our business and supply chains.
- Promote ethical employment and procurement practices.
- Foster transparency and accountability at all levels of the organisation and across supplier relationships.

Violations of this Modern Slavery Policy are treated with the utmost seriousness and may result in significant consequences, including:

- For employees: Disciplinary action in accordance with our internal procedures, up to and including dismissal for misconduct or serious misconduct.
- For contractors, suppliers, or other external partners: Review and, where appropriate, termination of contracts or business relationships if a breach of this policy is identified.
- For individuals or entities engaged in unlawful practices: Reporting to the appropriate authorities where there is evidence of involvement in modern slavery or violations of fundamental human rights.

Whistleblower

Acquire Intelligence is committed to fostering a culture of corporate integrity, ethical conduct, and compliance with all applicable laws and regulations. We actively encourage employees, contractors, suppliers, and other stakeholders to speak up and report any conduct that is unethical, illegal, or contrary to our organisational values.

This Whistleblower Policy provides a clear framework for raising concerns about misconduct or any improper situation within the Company. It outlines how disclosures are received, assessed, investigated, and resolved in a way that protects the rights of all parties involved.

Our policy is particularly important in supporting our commitment to combatting modern slavery and upholding human rights across our business and supply chains. We recognise that modern slavery can often go unreported due to fear of retaliation, lack of awareness, or cultural and power imbalances.

In the Whistleblower Policy that we are implementing, we –

- Encourage individuals to report any concerns related to unethical or unlawful conduct, including suspected incidents of modern slavery, human rights abuses, fraud, corruption, or other serious misconduct.
- Provided confidential and anonymous reporting channels.
- Ensures that whistleblowers are protected from retaliation, victimisation, or any form of disadvantage for making a report in good faith.
- Confirms that all allegations will be taken seriously, assessed promptly, and investigated where necessary by impartial and qualified personnel.

By creating a safe and supportive environment for whistleblowers, we aim to identify and address risks at the earliest opportunity and strengthen accountability throughout our operations and supply chains.

Modern Slavery Training

Training is important in enforcing the Modern Slavery Practises of Acquire Intelligence. An online learning module is in place to promote modern slavery awareness in the organisation. This includes training on how to identify modern slavery practices and the parts of our business and supply chains that may be subject to a greater risk of modern slavery practices. This training will also form part of the induction process for all individuals who work for us, whether as employees or contractor

Our modern slavery training modules are regularly reviewed and updated to ensure the pressing modern slavery risks are discussed. This way, we can educate our employees and contractors on how to prevent them.

Our Effectiveness in Combating Slavery

To ensure that modern slavery is not taking place within any part of our operations or supply chains, Acquire Intelligence has established key performance indicators (KPIs) to assess the effectiveness of our actions and continuous improvement efforts. These indicators form part of our broader risk management and compliance framework under the Modern Slavery Act 2018 (Cth).

The following KPIs are currently used to monitor and evaluate our progress:

Supplier Accreditation

- All new suppliers are assessed as part of our vendor accreditation process to ensure compliance with Acquire Intelligence's Modern Slavery and Responsible Procurement Policy. In the last financial year, 100% of new vendors successfully met these requirements.
- The process for publishing and reviewing results from the Modern Slavery Questionnaire has been improved to ensure greater transparency, consistency, and accountability in how we engage with suppliers on modern slavery risks.
- No modern slavery risks or non-compliance issues were identified through our supplier screening process, other than minor delays in the submission of required accreditation documents.

Policy Enhancement and Risk Monitoring

We have continued to update our Modern Slavery Supply Risk Policy, incorporating enhanced provisions for ongoing risk monitoring, reporting mechanisms, and the development of corrective actions as part of our annual compliance and review cycle.

Whistleblower Reports

There were no reports or concerns relating to modern slavery raised through our whistleblower channels during the reporting period.

Compliance in Talent Acquisition

We maintained 100% compliance with our recruitment policies, ensuring that only legally eligible and properly vetted candidates were employed. No complaints or concerns were raised through our HR or recruitment processes that would indicate the presence of modern slavery.

Employee Awareness and Training

Our modern slavery training program remains accessible to all employees globally, supporting continued awareness and education across the organisation.

Modern Slavery Governance

Any identified non-compliance issues or risks are escalated to the Risk Management Committee, with actions taken documented and implemented in line with committee recommendations and based on findings from our risk surveys and assessments.

Acquire Intelligence remains committed to upholding high standards of due diligence and risk mitigation. We apply a consistent and structured approach to identifying, monitoring, and managing modern slavery risks—regardless of the geographical location or perceived vulnerability of the environment in which we operate or the suppliers with whom we engage.

By embedding these practices across our operations, we aim to continually improve the effectiveness of our actions, strengthen supplier accountability, and ensure that modern slavery has no place in our business or supply chains.



Further Steps and Remediation

Following a review of the effectiveness of the steps, we have taken care to ensure that there is no slavery in our supply chains. We intend to continue taking remedial steps to combat slavery in our operations and supply chain.

Our Risk Management and Compliance Department is responsible for monitoring and auditing internal controls and procedures to mitigate the risks of modern slavery practices in our operations under Australian modern slavery legislation, including our subsidiary organisations.

This Modern Slavery Statement is made by Acquire Intelligence Pty Ltd and its subsidiaries for the financial year that ended in June 2025.

This Modern Slavery Statement has been approved by the principal governing bodies Ostia Holdings Pty Ltd. and Stav Holdings Pty Ltd.

Signed by: *Scott Stavretis*

Scott Stavretis

Chief Executive Officer – Acquire Intelligence Pty
Ltd Level 15, 10 Queens Road, Melbourne, VIC 3004
28th November 2025

Appendix:

How our Statement addresses the mandatory reporting criteria.

Modern Slavery Act Requirements	Reference on the Acquire Intelligence Report
Identify the reporting entity	Our commitment against modern slavery page 3
Describe the structure, operations, and supply chains of the reporting entity	Our corporate structure, operations, and supply chain pages 3 - 6
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	Risk of modern slavery page 7
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	Preventing modern slavery in our business pages 7 - 9
Describe how the reporting entity assesses the effectiveness of such actions	Our effectiveness in combating slavery page 9-10
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation page 5
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Due diligence on Modern Slavery page 7-8 Modern slavery training page 9-10
Provide the details of approval by the principal governing body of the reporting entity	Further steps and remediation page 11