

## DEPUTY - MODERN SLAVERY STATEMENT 2024

### About this statement

This modern slavery statement ("**Statement**") covers the activities of Deputy Group Pty Ltd (ACN 608 535 093) ("**Deputy Group**"), Deputy Group's wholly-owned subsidiary Deputec Pty Ltd (ACN 133 632 327) ("**Deputec**") and Deputec's wholly-owned subsidiary Deputy EMEA Limited ("**Deputy EMEA**") (together, "**Deputy**", "**we**", "**us**" or "**our**") for the financial year ending 30 June 2024 ("**Reporting Period**"). This Statement has been produced in accordance with Australia's Modern Slavery Act (2018) and the United Kingdom's Modern Slavery Act (2015).

Deputy has prepared a joint statement covering the entities listed above because we operate using group-wide policies and procedures to assess and manage modern slavery risks. For clarity, each of Deputy Group, Deputec and Deputy EMEA are reporting entities under this Statement.

This Statement outlines the actions of Deputy to address modern slavery risks in our operations and supply chain. It applies to and describes the steps taken by Deputy to seek to minimise the risks of modern slavery occurring in Deputy's operations and supply chains.

### About Deputy

Deputy is building technology to address global challenges experienced by shift workers and the businesses that employ them. Deputy's platform bridges the technology and communications gap between frontline teams and decision-makers, enabling people to control their schedules, collaborate intuitively, and plan their lives outside work.

Deputy strengthens employer-employee relations and revolutionises how scheduled workers and businesses operate together, creating thriving workplaces in every community. Over 330,000 workplaces use Deputy to create better work-life experiences for more than 1.4 million scheduled workers globally.

### Deputy's culture and values

We're on a mission to improve the world of work for everyone everywhere, one shift at a time - creating thriving workplaces in every community. This starts with us. Deputy is a values and purpose-driven organisation. We listen to learn, clock in for our customers, believe we're stronger together, lead with integrity, and own our shift.

## Deputy's structure, operations and supply chain

- Structure** Deputy Group is an Australian private company established in Sydney, Australia. Deputy Group wholly-owns Deputec (Deputy's Australian operating entity), which in turn wholly-owns Deputy EMEA (Deputy's UK operating entity). Each of the reporting entities have the same governance structure as, and follow the same policies as set and directed by, Deputy Group.
- Operations** Deputy is a SaaS provider with over 350 highly skilled professional workers made up of predominantly permanent employees primarily located in our core jurisdictions of Australia, the United States, and the United Kingdom in addition to contracted service providers who provide customer support and engineering development services using personnel based in the Philippines and Vietnam, respectively.
- Supply chain** Deputy's supply chain is primarily located in Australia and the United States with the majority of supplier spend in technology (i.e. other SaaS providers that support the delivery of Deputy's services to our customers), professional services (e.g. external legal, accounting, tax, audit, security and recruitment fees), marketing (e.g. marketing agency fees, event hosting and association memberships) and facilities (office rent, repairs and maintenance, cleaning and utilities). Only a small proportion of Deputy's supplier spend is put towards office supplies, office catering and staff merchandise.

## Modern slavery risks

As an online provider of workforce management services whose own workforce predominantly consists of professionally qualified and/or highly skilled employees and independent contractors engaged through formal written contracts and overseen by experienced human resources professionals, the risk of modern slavery in *our operations* has been assessed as low.

While we acknowledge that some of the countries in which Deputy engages suppliers are higher risk from a modern slavery perspective, i.e. the Philippines and Vietnam, since Deputy is an online services provider whose supply chain consists primarily of other technology products and services that support the delivery of our platform to our customers and comprises responsibly sourced providers subject to rigorous internal vendor review by Deputy, the risks of modern slavery in *our supply chain* have also been assessed as low.

However, we recognise that all major organisations have a risk of modern slavery - even if that risk lies in non-strategic sourcing categories or further down the supply chain. We also recognise the risk that our customers may engage in modern slavery practices and have, despite having a low degree of control over our customers' use of our services, sought to mitigate this risk by prohibiting illegal or unlawful uses of our services in our acceptable use policy (which has contractual force).

### **Controls and actions to address risks of modern slavery**

As contemplated in Deputy's first modern slavery statement for the financial year ending 30 June 2023, Deputy has implemented the following controls and actions to assess and address modern slavery risks in our operations and supply chain:

- **Processes.** Deputy has incorporated a modern slavery risk assessment ("**Risk Assessment**") into its procurement process. Suppliers deemed as "medium" or "high" risk based on the results of the Risk Assessment are required to complete a modern slavery supplier questionnaire ("**Questionnaire**"). The results of the Questionnaire will help inform Deputy of any modern slavery risks in the supplier's operations and supply chains and appropriate steps to mitigate such risks.
- **Policies.** A modern slavery policy has been created and included in Deputy's employee handbook, which must be acknowledged and accepted by all Deputy employees. In addition, a public supplier code of conduct with obligations in respect of modern slavery compliance, has been created and uploaded to Deputy's website.
- **Whistleblowing.** Deputy has implemented a formal whistleblowing procedure, known as the "Speak Up Hotline", which is an internet and telephone-based platform operated by an independent third-party, Convercent. The Speak Up Hotline allows Deputy employees and other listed individuals to confidentially and anonymously make disclosures of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct involving Deputy's business, without fear of retaliation. Deputy's whistleblower policy was amended to provide that the scope of the whistleblowing procedure includes any suspected modern slavery concerns.
- **Contractual controls.** A suite of contractual clauses and controls has been created for inclusion in our agreements with 'medium' or 'high' risk suppliers that aim to manage modern slavery risks in our supply chain.
- **Vendor review.** We have begun a modern slavery review of service providers providing personnel from higher risk countries such as the Philippines, Vietnam and India to ensure modern slavery risks are appropriately addressed and mitigated in our existing engagements.

Deputy plans to implement the following controls and actions in subsequent reporting periods to further assess and address modern slavery risks in our operations and supply chain:

- **Training and awareness.** Training of relevant team members in identifying and managing modern slavery risks.
- **Governance risk ownership.** Oversight by Deputy Audit & Risk Committee of Deputy's response to modern slavery risks and implementation of further control measures to reduce any such risks.
- **Vendor review.** Completion of vendor reviews (see above).

### **Effectiveness of controls and actions**

This Reporting Period has been focused on continuing to gain an understanding of the modern slavery risks in our operations and supply chains and implementing appropriate controls to address such risks moving forward.

Deputy intends to conduct annual internal reviews to assess the proposed controls and actions with the aim of continuous improvement.

### **Consultation and approval**

This Statement is made pursuant to Australia's Modern Slavery Act 2018 (Cth) and the United Kingdom's Modern Slavery Act (2015). This Statement was developed through consultation with relevant stakeholders within Deputy (including Deputy's legal, compliance, finance, procurement and senior leadership teams) and prepared by Deputy's legal team.

This Statement was approved by our board of directors and signed on its behalf by Silvija Martincevic, as at November 8, 2024.



Silvija Martincevic  
Chief Executive Officer and Director