



## Modern Slavery Statement

### **1. Reporting Entity Details**

This Modern Slavery Statement is made by NB Ventures, Inc. d/b/a GEP as a reporting entity under the Modern Slavery Act 2018 (Cth) for the reporting period December 01<sup>st</sup> 2025 through November 30<sup>th</sup>, 2026.

The Company is a corporation registered under the laws of Delaware, USA.

### **2. Structure, Operations and Supply Chains**

#### **Structure:**

NB Ventures, Inc. d/b/a GEP is a proprietary limited company incorporated and headquartered in the United States of America. The Company operates globally with several subsidiaries in each region including one in Australia, India, UK, Nederland etc. The organization is overseen by a Board of Directors and managed by an Executive Leadership Team with dedicated functions for finance, operations, procurement, legal, and risk.

#### **Operations:**

The Company employs approximately 4000 personnel globally, including permanent, contract, and project-based personnel. Certain support functions such as housekeeping and facility management are outsourced to third-party providers.

#### **Supply Chain:**

The Company's supply chain is services-based and supports our global procurement technology and consulting operations. Our suppliers include technology providers, professional services firms, labor hire and recruitment partners, cloud and IT infrastructure providers, and corporate support services such as facilities management, travel, and office supplies.

We do not manufacture physical goods, and our procurement does not involve raw materials or industrial production. However, certain categories such as IT hardware, offshore support services, and outsourced labor may involve higher-risk jurisdictions or subcontracting layers.



### **3. Risks of Modern Slavery Practices**

The Company's overall risk of modern slavery within its direct operations is considered low due to the professional nature of its procurement technology and consulting services. However, certain parts of our services-based supply chain present elevated risks, particularly where we rely on labor hire providers, offshore subcontractors, and global technology suppliers.

Outsourced services such as cleaning, security, and facilities management, as well as procurement of IT hardware, including laptops, servers, and network equipment—are recognized globally as higher-risk categories due to complex supply chains and potential vulnerabilities among low-skilled or migrant workers.

Geographic and sector-based risks may also arise where suppliers operate in regions with weaker labor protections or where multi-tier supply chains reduce visibility over employment practices. Although no instances of modern slavery were identified during the reporting period, the Company acknowledges these inherent risks and continues to prioritize enhanced due diligence, supplier engagement, and monitoring in higher-risk categories such as outsourced labor, offshore service delivery, and IT hardware procurement.

### **4. Actions Taken to Assess and Address Modern Slavery Risks**

During the reporting period, the Company implemented a range of measures to identify, assess, and mitigate modern slavery risks within its operations and services-based supply chain. These actions included strengthening supplier due-diligence processes, incorporating contractual clauses that require compliance with labor and human rights obligations, and updating internal governance through policies such as our Supplier Code of Conduct and Whistleblower Policy. We also ensured that high-risk supplier categories—such as labor hire, offshore service providers, and IT hardware procurement—were subject to enhanced review during onboarding and contract renewal processes.

To support these efforts, the Company delivered training and awareness programs to procurement, legal, and operations teams to improve recognition of modern slavery indicators and ensure consistent application of our risk-management practices. Where potential concerns were identified, we engaged directly with suppliers to seek clarification or corrective action, prioritizing the protection and fair treatment of workers in any remediation efforts. No instances of modern slavery were identified during the reporting period.

### **5. Effectiveness Assessment**

The Company assesses the effectiveness of its modern slavery risk-management efforts by monitoring supplier performance, reviewing compliance with contractual and policy



requirements, and evaluating internal reporting or concerns raised during the year. Feedback from procurement, legal, and delivery teams helps identify areas for improvement, and periodic internal reviews ensure our controls remain appropriate for the nature of our services-based supply chain. The Company acknowledges that continuous improvement is essential and will further strengthen its assessment methods in future reporting periods through clearer metrics and deeper supplier engagement.

#### **6. Consultation with Controlled Entities / Subsidiaries**

The Company consulted with relevant internal teams and any controlled entities to ensure a consistent approach to identifying and managing modern slavery risks across the organization.

#### **7. Future Commitments**

The Company will continue strengthening its practices by enhancing supplier oversight, improving staff training, and developing clearer metrics to assess modern slavery risks and the effectiveness of our actions.

#### **8. Approval by the Board**

This Modern Slavery Statement was reviewed and formally approved by the Board, confirming the Company's commitment to ethical conduct and compliance with the Modern Slavery Act 2018 (Cth).

A handwritten signature in black ink, appearing to read "Roopa Makhija", written over a horizontal line.

Roopa Makhija

Secretary

NB Ventures, Inc. d/b/a GEP

Date: December 3, 2025