Adapt IT Modern Slavery Statement
Financial Year 2024

1. **Introduction**

   a. This statement provides information about Adapt IT Proprietary Limited and its group companies (together, 'Adapt IT'), and sets out the plans and actions of Adapt IT to identify and mitigate modern slavery risks in its business and supply chain. Adapt IT Proprietary Limited is a private company registered in South Africa and a wholly owned subsidiary of Adapt IT Holdings Proprietary Limited, the South African holding company for the Adapt IT group which is itself a subsidiary of the Constellation Software Inc. (CSI) group of companies. CSI is a Canadian public company listed on the Toronto Stock Exchange under the symbol CSU.

   b. This statement is made pursuant to the Modern Slavery Act 2018 (Act) and relates to the financial year 1 January 2024 to 31 December 2024 (Reporting Period).

   c. Section 54 of the Australian Modern Slavery Act requires organisations registered or carrying on business in Australia, and with a consolidated revenue of at least AUD$100 million, to report annually in a modern slavery statement on how they are addressing the risks of modern slavery in their supply chain and operations. Adapt IT Proprietary Limited is a reporting entity as defined in the Act.

2. Adapt IT Operations

a. Adapt IT has its headquarters in South Africa and a financial year-end of 31 December.

b. The operations of Adapt IT are decentralized however certain processes and reporting obligations are managed centrally. The Governance, Compliance and Regulatory Risk ("GCRR") function is part of Group - Shared Services and was responsible for coordinating and compiling this statement. A consultation process with senior management within the divisions of Adapt IT was undertaken to draft this statement. Policies and processes that are substantially similar have been identified in this statement.

c. Adapt IT group companies sell software and services to several industries, both in the public and private sectors.

d. Adapt IT group companies have operations in Australia, including through Adapt IT Australasia (Pty) Ltd, a company incorporated and registered in Australia.

e. Adapt IT group companies deliver their software and services by grant of license, rights to use a service or through arrangements with third parties.

f. Adapt IT group companies often rely on manufacturing partners to produce hardware-related components and hardware products.

3. **Supply chains**

   a. Adapt IT group companies each manage their own supply chain relevant to delivery of their software, hardware and related services.

   b. The operations of Adapt IT group companies require suppliers such as professional service providers, maintenance service providers, software developers, goods manufacturers and other software and technology providers.

   c. While some may be sourced from Australia, Adapt IT group companies have global supply chains. Adapt IT group companies work with vendors to understand and evaluate their supply chain. Management of Adapt IT group companies implement centralised and individual policies and procedures for oversight of these supply chains.

   d. Major supply chains include both local and international provision of goods and services.

4. **Risk mitigations**

   a. Adapt IT believes that all business affairs of the company must be conducted in compliance with all applicable laws, rules and regulations and in accordance with the highest standards of honesty, integrity and ethical behaviour in all jurisdictions in which the company operates. Adapt IT is committed to treating workers with respect and dignity by ensuring safe working conditions, sourcing responsibly and conducting transparent and ethical operations.

b. To mitigate the risk of modern slavery in its operations and supply chain, Adapt IT has put the following measures in place :

    i. **Governance framework:** The Governance, Compliance and Regulatory Risk ("GCRR") Department ensures high levels of good governance are maintained across the group. In the reporting period, the Compliance Due Diligence Policy has been updated to include provisions dealing with Modern Slavery risks. The company has developed other policies that support this policy, namely, the Anti-Bribery and Corruption Policy, the Code of Ethics and Conduct Policy and other related policies. A Modern Slavery Policy has been drafted and is currently awaiting approval by the relevant governance structure within Adapt IT. The company is in the process of publishing a Modern Slavery Statement on its public-facing website, www.adaptit.com, to demonstrate our stance on Modern Slavery and human trafficking.

    ii. **Supplier agreements:** Adapt IT template agreements have been updated to include provisions dealing with modern slavery risks**.**

    iii. **Due Diligence Checks:** Adapt IT conducts due diligence checks on all third parties (including vendors and suppliers) in different circumstances to ensure that it is aware of potential legal and reputational risks before entering into any business relationship. Potential vendors are also required to make written attestations as part of the Adapt IT vendor onboarding / registration process – confirming that they are not involved in any form of human trafficking or modern slavery directly or indirectly through their supply chain.

iv. **Staff awareness**: The company conducts regular awareness on governance policies including the Compliance Due Diligence Policy which now includes provisions dealing with Modern Slavery risks. The policies are made available to all staff on the company's intranet.

v. **Whistle-blowing Policy**: Adapt IT has a Whistleblowing Policy in place which can be accessed by the general public as well. The policy explains the types of concerns that can be reported, the way in which whistleblowing reports will be dealt with and the protection afforded to whistle-blowers. The company has an externally managed 24/7 ethics reporting tool (namely, Ethics Defender) where staff and the general public can report unethical behaviour anonymously, anywhere and anytime.

vi. **Geographic Risks**: The company adopts an International Expansion Policy that provides guidelines on the management of the risks associated with international expansions by requiring consideration of best practices for international expansions, and formal approval in certain circumstances, before entering into a new country or signing a new contract with a customer or other third party in a country that may be subject to sanctions or trade restrictions. Adapt IT conducts due diligence checks on all new and potential suppliers.

vii. **Employment Risks:** Adapt IT prohibits any form of child labour and does not recruit illegal or forced workers. Strict adherence to legislation is central to Adapt IT's operations. The employment laws that Adapt IT adheres to prohibit child, forced or compulsory labour or any illegal labour practices. This principle is followed in every country in which Adapt IT operates, including Australia. Adapt IT adheres strictly to the law and there are no risks for incidents or occurrences of child, forced, compulsory or illegal labour.

c.   Adapt IT will continue to conduct risk assessments to ensure that any risks of modern slavery in its operations and supply chain are identified and mitigated. In the event that any modern slavery risks are identified, these will be escalated accordingly and will be included in the next reporting cycle.

This statement was approved by the Directors of Adapt IT (Pty) Ltd in their capacity as principal governing body of the entity.
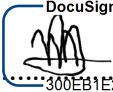
Name: Tony Vicente

Name: Nombali Mbambo

Position: Director and Chief Executive Officer

Position: Director and Group Finance Director – MEA Region

Signature: ……………………………………………

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Date: 11-Jun-2025
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