



Modern Slavery Statement 2023-24

Preamble

ReadyTech (ASX:RDY) exists to help communities thrive. We recognise modern slavery as a significant worldwide problem. We are fully committed to identifying and addressing acts of modern slavery and human trafficking from occurring within our business or supply chains. We expect the same high standards and commitment from all our contractors, suppliers and business partners.

This Modern Slavery statement ("Statement") covers the reporting entity, ReadyTech Holdings Limited, and each of its wholly owned or controlled entities (see below on page 2 of this Statement) for the reporting period 1 July 2023 to 30 June 2024 ("Reporting Period"). This Statement is made in accordance with the Modern Slavery Act 2018 (Cth) ("Act"), reflecting ReadyTech's continued commitment to addressing modern slavery risks as the company achieved significant growth, with revenue reaching \$113.8 million during the Reporting Period. Throughout this period, ReadyTech has strengthened its efforts to identify and mitigate risks of modern slavery within its operations and supply chains. This Statement contains ReadyTech's risk assessment of its operations and supply chains, actions it has already implemented to mitigate risks across its business, and details ReadyTech's commitments to ongoing action including over the next reporting period.

The Statement has been reviewed and approved by the Board of ReadyTech Holdings Limited.

Who We Are (our structure, operations and supply chain)

Structure

ReadyTech (ASX:RDY) was incorporated in Australia. ReadyTech has been listed on the Australian Stock Exchange since 2019. This Statement represents our Modern Slavery Statement as a Group to assess and address the risks of modern slavery in our business operations and supply chain.

Reporting entity	: ReadyTech Holdings Limited
ABN	: 25 632 137 216
Registered Office	: Level 2, 77 King Street, Sydney, NSW 2000
Industry	: Information Technology and telecommunications.



RDY controlled the following entities during the Reporting Period:

Name	Principle place of business/Country of incorporation
ReadyTech HoldCo Pty Ltd	Australia
ReadyTech EWP Pty Ltd	Australia
Esher House Pty Ltd	Australia
VETtrak Pty Ltd	Australia
Lirac HoldCo Pty Ltd	Australia
Lirac Bidco Pty Ltd	Australia
Ready Pay Services Pty Ltd	Australia
ReadyTech Workforce Solutions Pty Ltd	Australia
eLearning Australia Pty Ltd	Australia
Wagelink Australia Pty Ltd	Australia
Readytech Limited	New Zealand
Zambion Pty Ltd	Australia
Pentagon HoldCo Pty Ltd	Australia
Pentagon BidCo Pty Ltd	Australia
REadytech Gov Solutions Pty Ltd	Australia
McGirr Holdings Pty Ltd	Australia
McGirr Information Technology Pty Ltd	Australia
McGirr Technologies, Inc	United States of America
ReadyTech Procurement Solutions Pty Ltd	Australia
Avaxa Pty Ltd	Australia
Capital Software Limited	New Zealand
PhoenixATS Australia Pty Ltd	Australia



IT Vision Australia Pty Ltd	Australia
IT Vision Software Pty Ltd	Australia
Readytech Pty Ltd	Australia
Ready Payroll	Australia

Operations

The principal activities of ReadyTech are to provide technology-based solutions to its customers in the education, government, justice and workforce management sectors. These solutions are organised into the following three main segments:

Segment	Main Product	Description
Education and Work Pathways	JR Plus and AVAXA Ready LMS	JR Plus, AVAXA and Ready LMS are ReadyTech's student management system empowering enterprise tertiary educators to create digital student experiences while adhering to strict compliance standards.
	VETtrak, including VETtrak Cloud	VETtrak is a student management system for Registered Training Organisations (RTOs).
	Ready Skills	Ready Skills provides vocational skills tracking, recognition, planning and assessment technology.
	Job Ready, Ready Recruit and Job Apprentice	Job Ready, Ready Recruit and Job Apprentice help employment services providers, Group Training Organisations (GTOs) and Australian Apprenticeship Support Network (AASN) support the completion of apprenticeship lifecycle and deliver work opportunities for jobseekers and customers.
	Esher House	Esher House delivers behavioural assessment technology and intervention programs for Back to Work, apprentices and more.



Segment	Main Product	Description
Workforce Solutions	Ready Workforce	Ready Workforce is an all-in-one cloud payroll, HR, rostering, time & attendance and leave management software platform.
	Ready Employ	Ready Employ by Phoenix is a cloud-based talent management system to manage online processes.
	Ready Pay	Ready Pay provides people management software, combined with an end-to-end payroll outsourcing service, with local payroll experts providing customers with payroll, HR administration and workplace health & safety software and services.
Government and Justice	Ready Community (powered by Open Office)	Ready Community (powered by Open Office) provides high function, integrated, statutory and compliance management systems for local government.
	Ready Case	Ready Case (formerly case HQ, part of McGirr Technologies) is the market leader in case management systems for courts, tribunals and related justice sector agencies.
	Ready Contracts and Ready Buy	Ready Contracts and Ready Buy are designed as procurement software suites to support distributed goods and services procurement and commercial operations efficiently, cost effectively, and at reduced risk, while reducing workload on centralised procurement.
	Altus (powered by IT Vision)	Altus is a comprehensive enterprise resource planning (ERP) platform designed specifically for local governments.

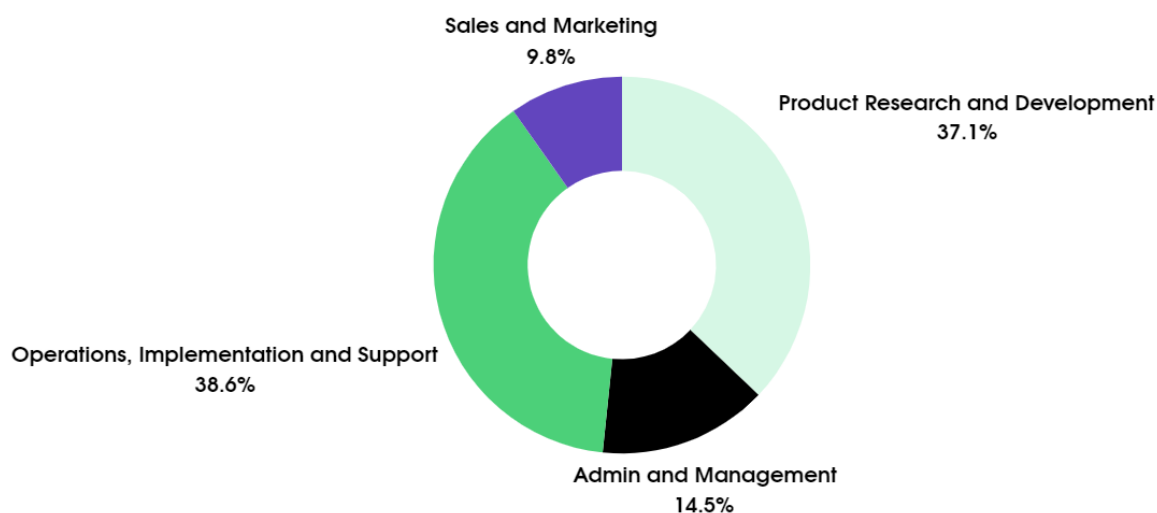


Synergysoft (powered by IT Vision)

SynergySoft is a legacy product suite used by local governments, which can be fully integrated with Altus solutions.

During the Reporting Period, our operations were conducted through various locations with offices in Australia (Sydney, Melbourne, Perth, Adelaide), New Zealand and the United Kingdom. We engaged 500++ people globally, which included employees and contractors engaged through third-party or outsourcing arrangements. The proportion of employees which perform our business functions is depicted below.

% of people roles by function



During the Reporting Period, 83.5% of our workforce was contracted directly by ReadyTech in Australia and New Zealand. The remaining portion of our workforce was engaged either directly or through third-party recruitment to perform contracting roles overseas in jurisdictions including India, Indonesia, the Philippines, Vietnam and Romania.

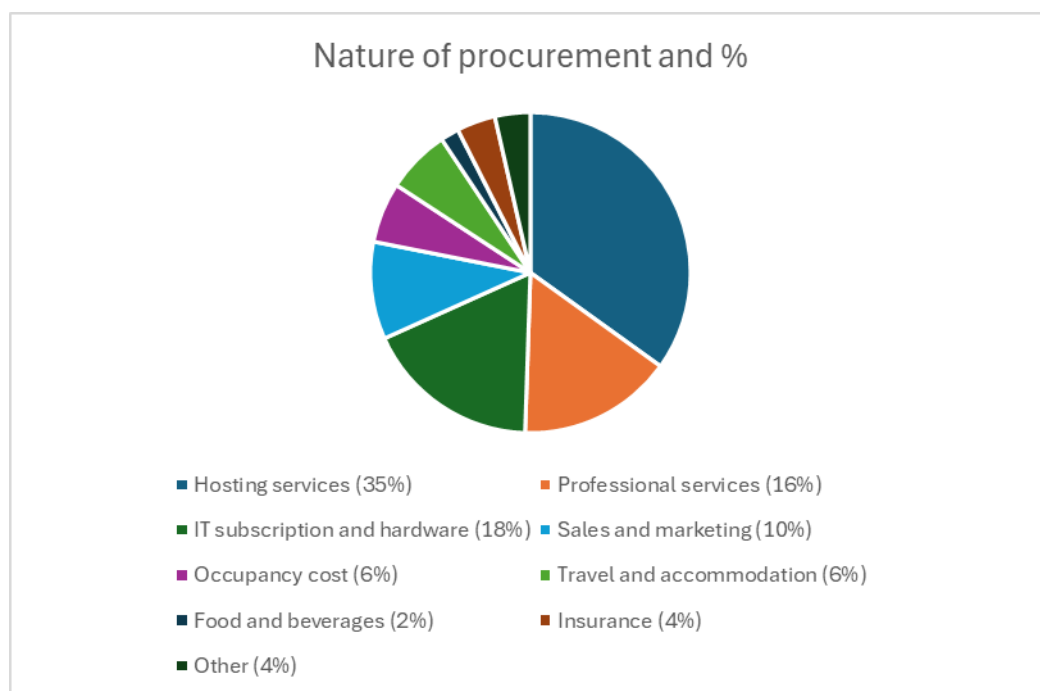
Supply Chain



We have commenced formally mapping our supply chain with the initial focus on our main procurement categories by spend. This mapping will be expanded across the full supply chain in the next reporting period (see our further actions below within this Statement).

ReadyTech directly engaged around 700 suppliers during the Reporting Period. Most of our suppliers were located in countries with a low prevalence of modern slavery (Australia, New Zealand and United Kingdom). Our main supplier spend categories during the Reporting Period are depicted below:

% of procurement by nature



Our largest category of supplier spend was hosting services which along with the purchase of IT subscriptions and hardware, represents about 53% of our total procurement. These categories include the provision of software, hardware, hosting and cloud platform services, computer systems and peripheral devices, telecommunications and network technology services. The second largest category is professional services providing audit, accounting, legal, consultancy, insurance and company secretarial services. These professionals are mainly located in Australia and New Zealand. We have a mix of short- and long-term relationships with our suppliers.



Risk Assessment of Modern Slavery Practices

We have conducted an initial assessment of the risks of modern slavery which may be present in our operations and supply chain. Our analysis considered several risk factors including:

- sectors and industries in which we operate;
- nature of the products and services procured by RDY; and
- geographical location of our subsidiaries, suppliers and contractors.

Risks within our operations

We operate primarily across the professional services industry and predominantly in Australia and New Zealand, which are countries with a low prevalence of modern slavery.

As a technology business, our largest and most crucial resource is our workforce, which includes employees and contractors. Given the robust Australian and New Zealand workplace regulations with which ReadyTech fully complies, including the Fair Work Act 2009, Work Health and Safety Act 2011, the Australia Superannuation Guarantee Act and laws against discrimination, bullying, and harassment, NZ Employment Relations Act 2000, NZ Health and Safety at Work Act 2015 and NZ Human Rights Act 1993, and ReadyTech's systems for ensuring compliance, we consider that the risk of modern slavery occurring in our Australian and New Zealand operations is low. Further, the level of skills and expertise of our workforce is high to meet the business requirements. The vast majority of our employees and contractors are highly skilled professionals with qualifications, knowledge, and competencies related to their role. Given the educational and skills-based thresholds required for employment in these roles, we consider there is a lower potential for exploitation of these workers and therefore lower risks of modern slavery. Within ReadyTech there are also clear avenues (internal and external) to raise any concerns employees might have about the terms and conditions of their employment or contract.

Although we consider there is a low risk of modern slavery in the majority of our workforce, we acknowledge that arrangements with contractors located in the Asia Pacific region (e.g., Vietnam, India, Indonesia, Philippines) and Romania may pose higher risks of modern slavery given the geopolitical and other circumstances prevalent within these markets. A number of these jurisdictions have experienced poor governance and labour protections and as a result, higher rates of modern slavery. These jurisdictions also experience lower levels of transparency and accountability by various governments on employment standards and contracting arrangements. Workers and contractors in Australia and New Zealand have clearly enjoyed higher levels of protection.



Supplier Risk Assessment Criteria

We continued to focus on suppliers with a contract value above \$1 million, evaluating their modern slavery risks as high, medium, or low based on the following criteria:

- The types of products and services provided to ReadyTech.
- The supplier's location or, where known, the locations from which they sourced goods and services for ReadyTech.
- Whether the supplier had an anti-modern slavery policy or other modern slavery risk management processes in place.

Definition of High-Risk Suppliers

High-risk suppliers are those procuring raw materials or services from high-risk locations without anti-modern slavery measures. During this reporting period, no suppliers were identified as high-risk for modern slavery.

IT Hardware Procurement Risks

Our business model does not involve direct procurement of raw materials. However, our highest exposure to modern slavery risks continues to be through the procurement of IT hardware. This stems from the use of components such as tin, tantalum, tungsten, and gold—materials associated with regions and industries that carry a higher risk of modern slavery.

Mitigation Measures in IT Procurement

Our IT hardware procurement is centrally managed by our IT support division.

- **Large Suppliers:** The majority of our hardware is sourced from large multinational companies, such as Apple and Hewlett Packard, which are subject to conflict and forced labour mineral regulations.
- **Local Retailers:** A smaller proportion of IT hardware and peripherals is purchased from local retailers, such as JB Hi-Fi. While our visibility into their supply chains is limited, we consider these risks medium to low due to the reputable nature of these companies and their established modern slavery processes.

Professional Services Engagement

Risks associated with our engagements with professional services providers remain low. These providers are predominantly located in Australia and New Zealand—countries with a low prevalence of modern slavery. Additionally, we work exclusively with reputable, creditworthy providers that maintain modern slavery policies.

Ongoing Efforts and Future Focus

This reporting period saw an enhanced understanding of supply chain risks, with ongoing reviews of supplier practices and a focus on improving visibility into high-risk categories, particularly IT hardware procurement. These efforts will continue to be a priority in future reporting periods.



Actions to Assess and Address the Risks

This Statement marks ReadyTech's second reporting on modern slavery risks, demonstrating our ongoing commitment to enhancing processes and controls to address risks of directly or indirectly engaging in modern slavery practices. Since our first Statement, we have made progress in refining our approach and expanding our efforts to mitigate these risks. During the Reporting Period, we had the following controls in place to address modern slavery risks:

Operations

Australia and New Zealand

ReadyTech continues to ensure compliance with employment laws by benchmarking and market-testing salaries to ensure all contractual arrangements exceed the legislated minimum wage in Australia and New Zealand.

Progress and New Measures Implemented During the Reporting Period:

1. Annual Salary Benchmarking:

ReadyTech conducted its annual salary benchmarking process, utilizing industry data provided by an external party. For newly acquired businesses, this process also ensured alignment with both internal pay structures and external market benchmarks, maintaining fairness and competitiveness.

Our People and Culture Team routinely assesses whether an employee is subject to any industrial awards and conducts a comprehensive review of the salaries and conditions of award-covered employees to ensure compliance with minimum award standards. Approximately 32.2% of our employees are covered by the Clerks Private Sector Award 2020, the Professional Employees Award 2020, and the Miscellaneous Award 2020. Any employee identified as being at risk of not meeting minimum award conditions is flagged, prompting action such as increased salary adjustments and/or a review of working conditions.

For non-award employees, we conduct bi-annual salary benchmarking using external industry data. Any significant pay disparities between our employees and the market trigger a review, with findings



communicated to the relevant Chief Executive for action. These matters are closely monitored by ReadyTech's Chief Executive and are reported to the Board's Nomination and Remuneration Committee.

2. Employee Engagement Survey:

ReadyTech conducted an employee engagement survey, which included elements linked to reward and recognition. Feedback from this survey is being monitored and used to inform decisions about ongoing improvements to reward frameworks.

3. Leadership Training on Compliance and Benchmarking:

During the reporting period, training sessions were delivered to leaders covering salary benchmarking, award compliance, and their roles in maintaining equitable and competitive pay practices.

4. People and Culture Team Training:

The People and Culture Team received targeted training to enhance their understanding of industrial award requirements and ensure robust processes for identifying and addressing compliance risks.

5. Planned Review of Independent Contractors:

ReadyTech is committed to expanding its focus on independent contractors. In the next reporting period, a comprehensive review will be undertaken to evaluate contractor pay arrangements against local market benchmarks, ensuring fair compensation practices.

Other markets outside Australia and New Zealand

ReadyTech employs a small team in United Kingdom where we engage an outsourced payroll service to provide advice on employment requirements (e.g., minimum wage, standard working conditions) to ensure our compliance with local regulations.

For contractors located outside Australia and New Zealand, ReadyTech continues to verify the minimum wage in each respective country of engagement. While independent contractors do not



receive employee entitlements, we are actively reviewing their pay arrangements against the minimum wages in relevant local markets to ensure they are paid fairly.

During the reporting period, this review has been progressing and will continue to include testing compliance with any new employment regulations or conditions required in those markets. Though ReadyTech executive staff and representatives have previously visited the offices of some overseas contractors to conduct personal interviews and gain situational insights on potential modern slavery risks, no such visits have occurred recently. Moving forward, ReadyTech remains committed to conducting further in-market visits by relevant product team leaders as part of ongoing efforts to identify and mitigate risks of modern slavery during the next reporting period

Policies

Modern Slavery policy

Prior to the Reporting Period, RDY developed a Modern Slavery Policy to reflect our commitment to respect and promote human rights and effectively manage issues relating to modern slavery and human rights. The policy applies to people in our business, including directors, all employees and officers of RDY and its controlled entities and contractors and consultants to ReadyTech.

The policy is published on the ReadyTech website - https://www.readytech.com.au/assets/RDY_Modern-Slavery-Policy_12-May-2022.pdf

ReadyTech also has complementary internal policies that support our modern slavery and human rights initiatives:

- Risk management policy
- Health and safety policies
- Corporate social responsibility policies



Effectiveness of measures to address modern slavery risks

ReadyTech is commencing a review of the effectiveness of our actions and controls. We recognise that continuous monitoring and improvement is required to meet our commitment to addressing modern slavery risks in our business. We have committed to several actions below to better address potential modern slavery risks and ensure the effectiveness of measures on ongoing basis.

Future actions to identify, assess and address modern slavery risks

ReadyTech is committed to further enhancing its response to modern slavery risks and has identified the following measures, which are currently in progress or nearing finalisation:

Supplier due diligence

We are in the process of implementing a supplier questionnaire and a statement of business ethics or partner code of conduct for all suppliers to ReadyTech. Additionally, we are refining our supplier risk assessment processes for direct suppliers with a contract value above \$1 million. As part of this ongoing due diligence, we will request suppliers to provide current documentation outlining how they assess and address modern slavery risks within their supply chains. This will enable us to assess supplier practices and identify potential risks and red flags. Over the next reporting period, we will prioritise actions to address any emerging risks based on the information provided.

Independent audit

ReadyTech is currently evaluating tools to track compliance with modern slavery requirements and exploring options for conducting independent external audits of our processes and controls. The initial focus will be on suppliers with medium to high risks and contractors located outside Australia and New Zealand. Any identified breaches will be addressed promptly, with actions taken to further reduce potential modern slavery risks within our operations and supply chain.



Consultation and Approval

All entities controlled by ReadyTech operate under a common governance framework. Controlled entities have a standardised way of working and the same processes for identifying, assessing and responding to modern slavery risks in ReadyTech operations and supply chains. ReadyTech executive management oversees all controlled entities allowing for consistent application across ReadyTech's modern slavery framework and in reporting against key outcomes in this Statement, in accordance with the Act.

The Board of Directors of ReadyTech Holdings Limited approved this Statement, on behalf of the reporting entity and its controlled entities, as the principal governing body of the reporting entity.

Marc Washbourne

CEO, ReadyTech