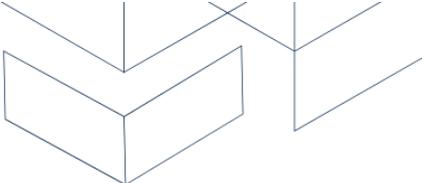




Modern Slavery Statement 2024-25
Infocus Wealth Management Limited
(ABN 28 103 551 015)

infocus

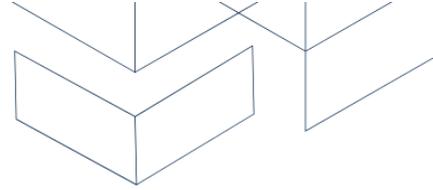




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Letter from the Managing director

As Founder and Managing Director of Infocus Wealth Management Limited and its subsidiaries, I am proud to present our first Modern Slavery Statement. This marks an important milestone in our commitment to ethical business practices and respect for human rights.

Modern slavery is a serious global issue that affects millions of people. The Group is committed to meeting our obligations under the Modern Slavery Act 2018 (Cth) and to conducting our business with integrity, transparency and respect for human rights.

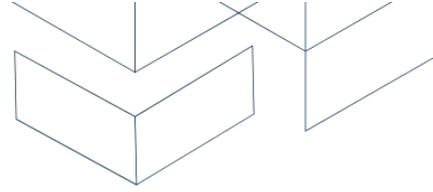
This first year of reporting has provided us with an opportunity to review our practices, strengthen our policies, and engage more deeply with our staff, suppliers, and stakeholders.

We understand that addressing modern slavery is an ongoing journey. We are dedicated to improvement and will continue to work collaboratively with our partners.



Darren Steinhardt
Founder and Managing Director





Overview and Business Structure

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2025. It describes the actions taken by Infocus Wealth Management Limited and its associated entities (“the Group”) to assess and address modern slavery risks in our operations, supply chains, and investment activities.

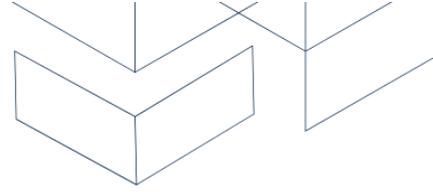
“Infocus has been helping advisers grow and thrive for more than 30 years.”

The Group has a foundational legacy as a national advisory firm model with the maturity, intelligence and advice-and-client-first principles required of a dynamic and sophisticated advice sector in Australia. The Group provides many services through its wholly owned and controlled subsidiaries and has attained consolidated revenue of at least \$100 million for the financial year ending 30 June 2025. Infocus also has a number of associated businesses however under the accounting standards these are not considered to be controlled subsidiaries.

The below table includes all actively trading entities during the 2025 financial year that are 100% owned and operated by Infocus Wealth Management Ltd.

Wholly Owned Entity	Business Activity
Infocus Securities Australia Pty Ltd ABN 47 097 797 049 AFSL and Australian Credit Licence No. 236523	Financial and mortgage broking services
Infocus Lending Advisory Pty Ltd ABN 19 134 237 031 and Australian Credit Licence Number 392704	Mortgage broking services
Madison Financial Group Pty Ltd ABN 36 002 459 001 AFSL No 246679	Financial services
Platformplus Pty Ltd ABN 46 103 551 533 AFSL No 563335	Financial technology services
Infocus Tax & Business Advisory Pty Ltd ABN 40 615064 983	Tax, accounting and business advisory services
Infocus Financial Planning Pty Ltd ABN 78 129 238 099	Salaried financial services
Alpha Investment Management Pty Ltd ABN 13 122 381 908 AFSL No 307379	Investment manager services
Commission Refunders Pty Ltd ABN 35 151 902 457	Commission collection services
Portfoliofocus Pty Ltd ABN 40 098 278 589	Marketing and promotional services
Portfolio Administration and Reporting Pty Ltd ABN 85 145 006 757	Marketing and promotional services
Wealthportal Pty Ltd ABN 61 131 002 036	Marketing and promotional services

During the reporting period, the Group engaged with over 70 employed/contracted staff members of whom none were permanently based overseas, over 250 suppliers and many investment funds under management.



Group Governance Structure

The Group operates under a robust governance framework designed to ensure effective oversight and accountability across all areas of the business.

The Board of Directors holds ultimate responsibility for the Group's governance, including the approval and oversight of the Modern Slavery Policy and the annual Modern Slavery Statement. The Board sets the strategic direction, risk appetite, and ethical standards for the organisation, and ensures that modern slavery risks are appropriately managed.

Supporting the Board are two key sub committees:

The Audit and Risk Committee is responsible for monitoring the Group's risk management framework, compliance obligations, and internal controls. This committee reviews the effectiveness of policies and procedures related to modern slavery and provides recommendations to the Board.

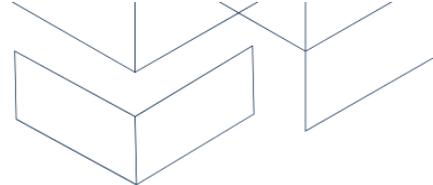
The Research and Investment Governance Committee oversees the Group's investment activities, including the assessment and management of modern slavery risks within investment portfolios and related supply chains. This committee reports to the Board on relevant findings and actions.

This Modern Slavery statement has been approved by the Group Board of Directors on the 17th of December 2025.

Assessment of Effectiveness and Consultation

All subsidiaries of the Group have reporting obligations into the Board and operate under a common and consistent governance framework therefore have been through a consultation process. The reporting criteria and frequency for each subsidiary depends on the business activity of the subsidiary and is based on the many robust compliance policies in place. The reporting includes a combination of audits, KPI's, incident tracking, policy review and Key Risk Indicators as relevant.

In preparing this statement, the Group executive and senior management team were consulted resulting in all wholly owned subsidiaries having the opportunity for feedback and engagement in the application of the policy. Regular executive management meetings and information sharing were conducted to maintain a consistent approach to modern slavery risk management across the Group.



Legal Obligations and Commitment

The Group is committed to meeting our obligations under the Modern Slavery Act 2018 (Cth) and to conducting our business with integrity, transparency and respect for human rights. Through our adoption of a risk-based approach we prioritise actions where we have the greatest ability to influence and create meaningful change, with a focus on material suppliers, higher-risk sectors and activities where vulnerable populations may face increased risk of exploitation.

Through continuous improvement, responsible sourcing, supplier engagement and effective governance, the Group is committed to contributing to the prevention of modern slavery and supporting remediation where potential harm has been identified.

The Group remains committed to uplifting and conducting further due diligence checks and adding further clauses to renewed contracts in the coming financial year.

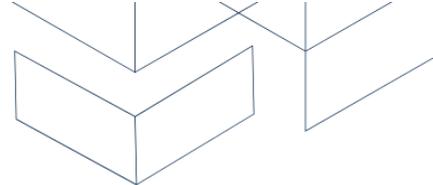
Service Providers and Supply Chain

The Group having multiple business activities, has determined that there are three functions for assessment. These include:

1. Business Operations – Employees and contractors labour
2. Supply Chain - Service providers and goods purchased
3. Investment Management – Fund, holdings and Manager oversight

Across these areas, upon review, the Group has determined that majority of the supply chain as it relates to the Modern Slavery requirements, include the suppliers and professionals in the below sectors:

- Building, maintenance, and construction
- Catering, hospitality and food services
- Cleaning and Security
- Education and training
- Entertainment, events and recreation
- Freight, logistics and transport
- Infrastructure – hardware, software, cloud services, and data hosting
- Investment Management
- Labour – Employees and contractors
- Marketing – Promotional goods, apparel, printing, creative services
- Office supplies and consumables
- Professional services – including but not limited to legal, auditing, accounting, human resources, Technology, insurance brokers and consulting
- Telecommunications and network infrastructure
- Travel services – transport and accommodation



- Utilities – water, waste management, electricity, internet

Assessment

The Group recognises that modern slavery risks are more likely to arise in the supply chain than in the business operations or investment management functions. An assessment approach of applying an inherent and residual risk has been considered for each function.

1. Business Operations

The risk of modern slavery within the Groups direct business operations is assessed as a low inherent and residual risk.

All employees are engaged in accordance with Australian employment laws, including the Fair Work Act 2009 (Cth), National Employment Standards, Workplace Health and Safety (WHS) legislation, and all relevant award and enterprise requirements. These regulatory frameworks provide strong protections for workers, reducing the likelihood of modern slavery practices within our workforce.

Contractors engaged to support our operations are governed under our Group Outsourced Policy, which requires all contracted service providers to comply with our expectations on workplace rights, workplace health and safety and data security. Contractors are required to complete modern slavery, cyber security, and WHS attestations, confirming that they have appropriate governance and controls in place and that their own labour practices meet Australian legal and ethical standards.

2. Supply Chain

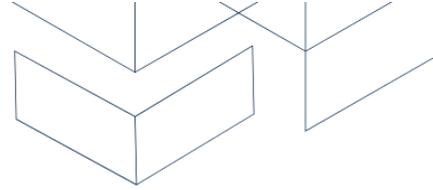
The Group procures a wide range of goods and services across its divisions, and recognises that modern slavery risks are more likely to arise within its supply chain than within its direct business operations.

The Group engages with many suppliers that are already Reporting Entities under the Modern Slavery Act 2018 (Cth). For these suppliers, the Group may rely on their publicly available Modern Slavery Statements and documented governance frameworks as evidence of appropriate risk management.

For suppliers that are not Reporting Entities, the Group applies a materiality-based matrix to determine the level of due diligence required. The materiality is based on the range of per annum spend and exposure to high risk sectors.

High-risk sectors within the Group's supply chain are those that are known, based on the Australian Government (ABF/AGD) Guidance for Reporting Entities.

Within the Group's procurement profile, high-risk categories are most likely to include the below sectors:



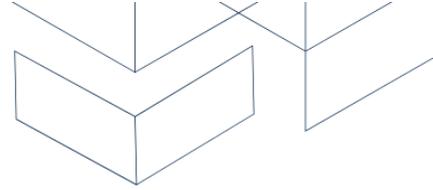
- Building, maintenance, and construction – potential use of subcontractors, labour hire, migrant workers.
- Catering, hospitality and food services – potential use migrant workers and known for wage theft, excessive hours, poor oversight.
- Cleaning and Security - potential use of subcontractors, labour hire, migrant workers.
- Freight, logistics and transport - potential use of subcontractors, labour hire, migrant workers.
- Infrastructure – potential for geographical forced labour issues within the electronics supply chain.
- Marketing – potential for geographical forced labour issues along with apparel/textile within the garment industry.

The residual risk of each supplier is influenced by the Group’s ability to obtain transparent information when requested, including access to policies, attestations, public disclosures, and responses to due diligence questionnaires.

3. Investment Management

The Group provides investment management services which as part of this responsibility it recognises that modern slavery risks may arise through entities where we have invested clients/members funds. The inherent modern slavery risk associated with our investment activities is assessed as low, noting that a significant portion of our investment exposure is to large Australian financial institutions and other entities that are Reporting Entities under the Modern Slavery Act 2018 (Cth) and publish annual Modern Slavery Statements.

In assessing modern slavery risk within our investment management activities, where these providers are Reporting Entities, The Group relies on their published Modern Slavery Statements as evidence of their governance and processes. For non-reporting entities, additional information may be requested for significant holdings to confirm that minimum expectations are met. For ASX and globally listed direct equities, our ability to effect change is limited however the majority are already reporting entities or have published an ESG policy.



Addressing Risk and Remediation

The Group uses a combination of the below items to address risks based on the results of the assessments:

- Board approval - of Policies and this statement.
- Subcommittee - reviews of the effectiveness of policies and procedures
- Policy Implementation: Maintained and updated our Modern Slavery Policy and Outsourcing Policy.
- Supplier Due Diligence
- Contractual Controls: Modern slavery clauses are included in supplier contracts where relevant.
- Investment Oversight
- Remediation: Where actual or suspected modern slavery is identified, the Group takes prompt action, including seeking clarification, requiring corrective measures, or discontinuing relationships if necessary.
- Reporting and Whistleblowing: Staff, contractors, and suppliers are encouraged to report concerns via established channels, including confidential whistleblower mechanisms.
- Training and Awareness: All new staff and relevant contractors receive targeted modern slavery training during onboarding. Ongoing awareness is provided to all staff, with enhanced training for those in procurement, risk, and compliance roles.