

Modern Slavery Statement

1 January 2024 to 31 December 2024

fusion5



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1 Introduction to our Modern Slavery Statement

Modern slavery is a global issue affecting businesses of all sizes and supply chains across many industries. Modern slavery can take many forms but at its core involves exploitative practices that violate fundamental human rights. At Fusion5, we recognise our responsibility to do our part to help address modern slavery in the modern world and are committed to ensuring ethical and transparent operations within our business and supply chains.

The Fusion5 business was founded in Wellington in 2003 and has since grown into a leading business solutions provider and systems integrator across Australia and New Zealand. As a New Zealand founded business, the business shares a home grown egalitarian ethos and focus on care for people and environment. This flows through into how the business operates and is reflected in its values – passion, integrity, commitment, teamwork and success – which shape Fusion5’s approach to business and employee engagement.

This is Fusion5’s first Modern Slavery Statement under the Modern Slavery Act 2018 (Cth). We acknowledge that we are still developing our formal approach to managing modern slavery risks and we are enhancing our awareness and building our capability. This Statement represents the starting point of a long-term commitment to understanding and addressing the modern slavery risks in our operations and our supply chains. We respect fundamental human rights and are committed to conducting our activities ethically.

Our business has a reputation for being agile and adaptable and we will apply this mindset to addressing modern slavery risks. While we are an office-based technology company, we recognise that modern slavery risks may exist deeper within our supply chains and we are committed to better understanding those risks and ensuring that our suppliers and partners align with our standards.



This statement is a joint statement made by Fusion5 Group Holdings Pty Ltd (ABN 86 673 651 691), Fugue Midco1 Pty Ltd (ABN 51 673 660 449), Fugue Midco2 Pty Ltd (ABN 88 673 667 911) and Fugue AU Bidco Pty Ltd (ABN 33 673 668 927) with their registered offices at Level 26, 101 Collins Street, Melbourne VIC 3000 and Fusion5 Pty Ltd (ABN 12 109 506 970) with its registered office at Level 43, 360 Elizabeth Street, Melbourne VIC 3000 in accordance with section 14 of the Modern Slavery Act 2018 (Cth) to cover the financial year ending 31 December 2024.

2 Our structure and operations

Fusion5 is an office-based, business solutions provider and systems integrator based and operating in Australia and New Zealand. The business specialises in digital transformation, enterprise software and IT services. Fusion5's key specialties include enterprise resource planning systems, customer relationship management solutions, cloud and security services, AI and automation and systems integration. Fusion5 employs approximately 850 people across Australia and New Zealand.

There are two main operating, customer facing entities within the Fusion5 group of companies: Fusion5 Pty Ltd, which is based and operates in Australia; and Fusion5 Limited, which is based and operates in New Zealand. These two operating entities are wholly owned subsidiaries of the reporting entities named on page 3 including Fusion5 Group Holdings Pty Ltd, the group's parent company. These reporting entities are non-revenue generating entities with no employees and form part of the group's capital structure. Fusion5 Pty Ltd also has a number of subsidiaries which are inactive.

Fusion5 is assisted by personnel in the Philippines engaged through an outsourced provider. These personnel support Fusion5's consulting and product development services. Fusion5 is also looking to establish its own offshore capability in the near future. The group has a company registered in the UK, which is in startup phase with no employees.

Below is a diagram showing the Fusion5 locations across Australia and New Zealand.



3 Our supply chain and risks of modern slavery in our supply chain

Fusion5 predominantly provides services to customers. Fusion5 also procures software and hardware for both its own use and for on-sale to its customers. Fusion5's supply chain includes goods and services needed to support the business' day-to-day operational needs.

Fusion5 buys goods and services every year from approximately 2000 suppliers, with approximately 80% of its spend with suppliers based in Australia or New Zealand and 20% of its spend with suppliers based in other locations, including USA, UK, South Africa and Canada. Fusion5's largest, key partners by spend are located in Australia, New Zealand and UK, but are part of global groups with a global footprint.

Fusion5's main areas of spend outside of its direct employment costs are:

- software and hardware procurement (for the Fusion5 business and on behalf of Fusion5's customers); and
- workplace costs and services (including leased premises, catering and office fresh food supplies).

Fusion5 receives services from contractors and recruiters and acknowledges that this is an area for future assessment to understand how these organisations are managing modern slavery risks in their operations and supply chains.

Based on the Global Slavery Index 2023, we recognise that the modern slavery risks that are typically present in the operations and supply chains of an office-based IT business such as Fusion5 arise in connection with the supply of:

- electronic goods
- offshore support and back office services
- cleaning and security services associated with Fusion5's leased premises
- recruitment services for personnel.

We recognise that our procurement of electronic goods, including laptops and computers, presents a high risk of modern slavery in our supply chains regardless of our spend.

Fusion5's modern slavery risk profile will be revisited and reassessed as the business grows and changes. We acknowledge that moves to establish offshore capability will have an impact on our risk profile and we will need to assess and manage that risk based on the location of the offshore office, the nature of the services being provided and the procurement needs to support the provision of those services.

4 Our actions to assess and address the risks of modern slavery in our supply chains

4.1 Assessment of modern slavery risk

In 2024, Fusion5 undertook a preliminary, high-level qualitative assessment on a selection of suppliers to begin identifying potential modern slavery risks in our supply chain. Our assessment was based on our first-hand knowledge of our suppliers as well as factors such as their location, the types of goods or services they supplied and their demonstrated commitment to managing modern slavery in their supply chains. This started to give us a sense of where modern slavery risks might exist in our operations and supply chain. Of the suppliers we looked at we did not identify any that we considered to have a high risk of modern slavery in their supply chain, however we acknowledge that a more detailed assessment across our full list of suppliers needs to be undertaken. In particular, we will be taking steps to better understand how suppliers in high risk sectors – such as electronic goods – and how our landlords (who engage the cleaning and security services that Fusion5 benefits from as a tenant) manage the risks of modern slavery in their operations and supply chains.

We consider the risk of modern slavery in the supply chains of our key partners by spend to be low or managed based on the public commitment of those partners to managing and mitigating the risk of slavery in their supply chains. We acknowledge that this alone does not remove the need for further diligence on our part to understand the risks.

We have assessed our suppliers by location and determined that approximately 80% of our direct supply relationships are with suppliers based in Australia or New Zealand, however we acknowledge that these suppliers are often part of global corporate groups operating in areas where the risk of modern slavery is higher. Of the suppliers based in other locations we have not identified any located in the highest risk jurisdictions based on the Global Slavery Index prevalence indicator.

We do, however, note that the Philippines is identified as having the 7th highest rate of prevalence in the Asia Pacific region (and is 36th globally), which is relevant to Fusion5's personnel based in the Philippines. Fusion5 is managing this risk through a combination of a contractual commitment on the part of the outsourced provider to manage and mitigate modern slavery risks in their business and to notify Fusion5 in the event of becoming aware of any breach of modern slavery laws. To date, no issues have been notified to Fusion5.

We will reassess the adequacy of these measures as part of a more detailed assessment of our suppliers and their supply chains in 2025.

Since 2022 we have proactively included in a number of our supplier agreements a modern slavery commitment requiring the supplier to take steps to identify, assess and address risks of modern slavery in their operations and to notify Fusion5 if the supplier becomes aware of any such practices and take action to address and remediate. To date, no issues have been notified. We will continue to encourage our suppliers to raise any issues with us (as an effective system should result in issues being identified and remediated).

4.2 Addressing the risks of modern slavery

Fusion5 is committed to building awareness of modern slavery as a global challenge and understanding the vulnerabilities in our operations and supply chains to modern slavery. As part of maturing our approach to addressing these risks we will be:

- developing appropriate policy settings (including Whistleblower Policy, Supplier Code of Conduct and a Modern Slavery Policy);
- undertaking a more detailed risk assessment of modern slavery risks across all suppliers;
- introducing modern slavery due diligence as part of our supplier onboarding process;
- continuing to include a modern slavery commitment in our supplier contracts – we currently estimate that 20% of our supply contracts contain this commitment and our goal over time will be for the majority of our supply contracts to contain this commitment;
- leveraging the modern slavery commitment in our supplier contracts to introduce a new supplier code of conduct so suppliers are aware of Fusion5's focus on modern slavery and expectation that Fusion5 is informed of any potential issues along with remediation actions;
- reinforcing our focus on modern slavery and expectations under the supplier code of conduct through annual attestations;
- reviewing our whistleblower policy to ensure modern slavery is explicitly covered;
- implementing a formal company-wide modern slavery policy with clear escalation pathways for any identified instances of modern slavery and a victim-centred principles to remediation;
- conducting staff training to raise awareness of modern slavery as an issue more broadly and a risk in our supply chains and ensuring staff understand their role in helping to detect, prevent and raise concerns about modern slavery in our business and our supply chains; and
- factor modern slavery risk management into the establishment of any offshore resource or capability and ensure there is a dedicated modern slavery plan in place.

5 Assessing effectiveness

Given that this is Fusion5's first Modern Slavery Statement, we are now exploring how to assess the effectiveness of our approach to addressing modern slavery risks. At this point – and based on the steps we propose to take to mature our approach to addressing modern slavery, we expect that this may include:

- establishing a modern slavery working group to maintain oversight of Fusion5's modern slavery related efforts and actions;
- establishing a modern slavery incident register to capture any identified incidents or potential incidents of modern slavery;
- ensuring staff are engaged in supplier diligence activity and supplier attestations so managing modern slavery risks is a whole-of-company undertaking and not limited to the efforts of a small team or subset of staff;
- engaging with our suppliers regularly in relation to their modern slavery risk profiles and aligning our approaches to managing modern slavery risks; and
- feedback and engagement as part of our ongoing modern slavery training and awareness raising.

We will continue to reflect upon how best to assess the effectiveness of our actions as our approach to managing modern slavery risks matures.

6 Consultation

The leadership team for the Fusion5 group (which makes operational decisions on behalf of all entities) has engaged with the issue of modern slavery and the role that businesses like Fusion5 play in addressing it. While we are still in the early stages of developing our approach, our leadership is committed to learning from the actions and strategies of other companies to combat modern slavery and will seek to adopt a collaborative and consultative approach.

The same policies, practices and procedures regarding responsible business, ethics and compliance apply across the group. The Board of each reporting entity has been provided with a copy of this statement for review and approval prior to signing and submission.

Approval

This statement has been reviewed and approved by the Board of Fusion5 Group Holdings Pty Ltd on 30 June 2025 on behalf Fusion5 Group Holdings Pty Ltd and each reporting entity.

Sven Martin, Fusion5 CEO - Australia



30 June 2025

7 Further information – our journey to modern slavery maturity

Fusion5 is in the process of maturing its approach to modern slavery, which will evolve over time. Fusion5 recognises that tackling modern slavery requires an ongoing commitment and will continue to enhance its awareness and improve its procedures to help identify and prevent the risks of modern slavery in its supply chains.