

# Modern Slavery Statement

## WT Financial Group Limited

Reporting Period: 1 July 2024 – 30 June 2025

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### 1. Reporting Entity

This statement is submitted by WT Financial Group Limited (ABN 87 169 037 058), an Australian public company listed on the Australian Securities Exchange (ASX: WTL). This statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and covers the reporting period 1 July 2024 to 30 June 2025.

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### 2. Structure, Operations and Supply Chains

#### Structure

WT Financial Group Limited is the parent company of a group of entities providing financial services in Australia. Our head office is located in Sydney, NSW. Our subsidiary entities include Wealth Today Pty Ltd, Sentry Advice Pty Ltd, Synchron Advice Pty Ltd, and Millennium3 Financial Services Pty Ltd.

#### Operations

We operate a business-to-business (B2B) model providing licensing, compliance support, professional development and technology services to over 500 financial advisers across more than 400 independently owned financial advice practices in Australia. We also provide direct-to-consumer (B2C) financial advice services through Spring Financial Group. Our operations are conducted from corporate offices in Australia, and we employ approximately 70 corporate staff.

For the reporting period, the Group recorded gross revenue of \$217.4 million.

#### Supply Chains

As a professional services business, our supply chains are limited and predominantly involve the procurement of corporate goods and services. Our key procurement categories include information technology (hardware, software, data-hosting and cloud services), professional services (legal, accounting, consulting), telecommunications, office supplies and equipment, facilities management (cleaning, security, maintenance), marketing and events, and corporate travel.

We procure the majority of goods and services from Australian-based suppliers. Some technology vendors and offshore contractors provide ancillary software development, marketing support, or data processing services. We do not manufacture goods or directly source raw materials.

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### 3. Modern Slavery Risks

We have assessed our modern slavery risk profile and consider our overall exposure to be very low. As a professional services business operating in Australia, we do not operate in industries or geographies commonly associated with higher modern slavery risk.

Notwithstanding our very low-risk profile, we recognise that modern slavery risks may exist in our supply chains, particularly in relation to:

- Offshore contractor arrangements for software development, marketing support, or data processing

- Cleaning, catering, and facilities management services, where subcontracting of low-wage labour may occur
- Promotional merchandise and corporate gifts

We have not identified any instances of modern slavery in our operations or supply chains during this reporting period.

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#### 4. Actions Taken to Assess and Address Risks

During the reporting period, we took the following actions to assess and address modern slavery risks:

Action	Description
Risk assessment	Conducted an initial assessment of modern slavery risks in our operations and supply chains, considering industry, geography and procurement categories.
Supplier engagement	Our standard supplier agreements include requirements for suppliers to comply with all applicable laws, which includes laws relating to modern slavery.
Staff awareness	Key personnel involved in procurement have been made aware of modern slavery risks and the Group's reporting obligations.
Grievance mechanisms	Our existing whistleblower policy provides a mechanism for staff and external parties to report concerns, including concerns relating to modern slavery.

Given our very low-risk profile, we consider these actions to be proportionate to the nature and extent of our modern slavery risks.

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#### 5. Assessing Effectiveness

We are at an early stage in developing processes to assess the effectiveness of our actions. During subsequent reporting periods, we intend to monitor effectiveness by:

- Tracking whether any modern slavery concerns are raised through our grievance mechanisms
- Reviewing the modern slavery statements of key suppliers where available
- Periodically reviewing our risk assessment to ensure it remains current

We will continue to develop our approach as our understanding of modern slavery risks matures.

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#### 6. Consultation with Owned or Controlled Entities

This statement covers WT Financial Group Limited and its wholly-owned subsidiaries, including Wealth Today Pty Ltd, Sentry Advice Pty Ltd, Synchron Advice Pty Ltd, and Millennium3 Financial Services Pty Ltd.

In preparing this statement, we consulted with relevant personnel across the Group, including representatives from each subsidiary. Our subsidiaries operate under centralised policies and procurement processes, and as such, the risks and actions described in this statement apply across the Group.

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## 7. Other Relevant Information

We are committed to continuous improvement in our response to modern slavery. In subsequent reporting periods, we will continue to review our risk assessment and refine our approach as appropriate to the nature and scale of our operations.

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## Approval

This statement was approved by the Board of Directors of WT Financial Group Limited, being the principal governing body of the reporting entity, on 1 December 2025.

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**Keith Cullen**

CEO / Director  
WT Financial Group Limited

1 December 2025