



Modern Slavery and Human Trafficking Statement

FY25

Direct Group acknowledges the Traditional Custodians of the land on which we operate, live and gather as a team, and recognises their continuous connection to land, water and community. We pay respects to all First Nations peoples, past and present, for their generosity and custodianship of Country.

The Direct Group Statement

This Modern Slavery Statement (Statement) has been prepared in accordance with the *Australian Modern Slavery Act 2018 (Cth) (Act)*, and sets out the activities taken by Direct Digital Group Holdings Pty Ltd ACN 657 310 140 431 (Direct Group) and its controlled entities*.

The Statement outlines the actions taken by Direct Group to address modern slavery risks within our operation and supply chains throughout the reporting period for the financial year ending 30 June 2025. Each section in this Statement corresponds to a mandatory criterion of the Act.

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*Controlled Entities

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1. INTRODUCTION AND SCOPE OF THE STATEMENT

Direct Group believes that everyone should be treated with dignity and respect and does not tolerate any of unfair or inhumane treatment of people.

Direct Group supports the Australian Government's efforts to assist the business community in addressing modern slavery, championing the drive for continuous improvement and implementing the Act and its actions towards advancing businesses' respect for human rights.

This is the sixth Modern Slavery Statement for Direct Digital Group Holdings Pty Ltd (Direct Group), and its purpose is to outline our approach to ensuring that Direct Group continues to put in place and develop robust frameworks and processes to identify and minimise the risk of modern slavery in our business operations and supply chains

More than 50% of forced labour happens mostly in private sectors of middle to high-income countries. These dire statistics demonstrate that we must be alert and continue evolve and enhance the way we assess and mitigate modern slavery risk factors.

Combatting modern slavery is complex and requires commitment and a coordinated effort across multiple stakeholders, both locally and globally. The Global Slavery Index (2025) shows that modern slavery has risen alarmingly, with estimated 50 million people living in modern slavery, an increase of 10 million since 2018. Of great concern is that more than 41,000 people in Australia live in modern slavery, with Federal Police reported cases continually increasing by 10% YoY.

In assessing modern slavery risk, we aim to prevent exploitation of our direct workforce and identify potential risks to workers in our multi-layered supply chain of products and services.

Direct Group does not tolerate modern slavery in its operation and supply chain. This commitment aligns with our Environmental, Social and Governance policies, processes and reviews, encompassing how we conduct business responsibly. We are committed to adopting ethical sourcing practices and taking measures

to address modern slavery, cooperating in remediating such impacts.

We recognise that addressing modern slavery requires not only making commitments and taking actions within our operation but also working collaboratively with entities in our supply chains.

We understand the Act requires year-on-year continuous improvement as this complex issue will not be solved with short-term actions and quick wins. We, therefore, take a preventive and principled-based approach to identifying modern slavery risks, and this Statement provides an overview of our ongoing efforts and actions and our plans going forward. We recognise that this is a work in progress and that the spirit of the Act is one of continuous improvement.

In FY25, we were committed to finalise the screening of our merchandise and of our service suppliers via questionnaires, starting with high-risk locations and identifying any modern slavery red flags. We have achieved these goals, establishing a strong foundation now embedded in our procurement processes.

There have been substantial changes in the executive team at Direct Group. As part of the renewal of the management and executive team, opportunities have been identified to further improve and change the sourcing strategy and buying partners of Direct Group, and with this comes the opportunity to tailor the commitment to a transparent approach for all risks in our supply chain, including risks of modern slavery.

The key focus in FY26 will be to continue to delve further in our compliance assessment of Tier 2 suppliers, as we appreciate that modern slavery is more likely to be present in longer and more complex supply chains such as ours.

In the future, we will be implementing a modern risk management framework guided by ISO31000 recommendations, which will provide an even more tailored risk lens for all the key risks in our business, deepen our transparency with high-risk suppliers, further assess our workforce compliance and improve modern slavery risk mitigation across the markets we operate in and source from.

2. OUR STRUCTURE, BUSINESS AND SUPPLY CHAIN

WHAT WE DO

Since its launch almost forty years ago, Direct Group has developed into one of Australia's leading comprehensive multi-channel retailer offering a wide range of products to a substantial customer base. Our direct purchase proposition is offered increasingly online and mainly targets the senior demographic market.

The group operates in Australia, New Zealand and Asia and it communicates directly with its customers through its websites, catalogues, television, print, digital publishing and customer hub.

The Direct Group's head office and supporting infrastructure of warehouses, TV and design studios, contact centres and computer facilities are in the northern suburbs of Sydney, Australia.

We have small offices in India, PRC, Hong Kong, Singapore and Taiwan and an outsourced contact centre in the Philippines.

The corporate structure consists of a holding company, Direct Digital Group Holdings Pty Ltd, comprising two operating divisions and several wholly owned, or majority-controlled subsidiaries (page 2).

These subsidiary entities have an annual consolidated revenue of over \$100m across the reporting period, therefore meeting the Act's definition of a reporting entity.

OUR BUSINESS STRUCTURE

Organisationally, the group is divided into two main operating divisions. Each run relatively autonomously with selected services such as warehousing, contact centre, distribution and IT infrastructure provided by a shared corporate team.

The first, Innovations, is a direct-to-consumer retailer with a portfolio of online and catalogue brands. Innovations markets to its customers in Australia and New Zealand.

The second, TVSN, is Australia's leading TV channel and e-commerce retailer with a live and on-demand presence, e-commerce sites and mobile application.

Both divisions offer a broad range of merchandise across beauty, apparel, foot ware, accessories, jewellery, homewares, health, gifts, electrical and electronic products, selected food and pet products.

OUR VALUES:

- Drive
- Integrity
- Respect & Empathy
- Environment
- Community
- Teamwork & Communication
- Growth
- Results Oriented
- Organised
- Understanding
- Productivity & Profit

Acquiring the licence to publish the iconic brand Reader’s Digest in 2017, in FY25 Direct Group was responsible for producing digital and print versions of the magazine in Australia, New Zealand and across the Asia region in both English and simplified Chinese, along with country-specific websites and curated social media content for all regions.

These channels are boosted by the highly respected annual Reader’s Digest Trusted Brands Survey Awards and Quality Service Awards, which allowed the business to deliver in FY25 extensive advertising campaigns across both print and digital formats.

OUR PURPOSE AND VALUES

Direct Group’s headquarters is at Innovations Park in Frenchs Forest, a northern beaches

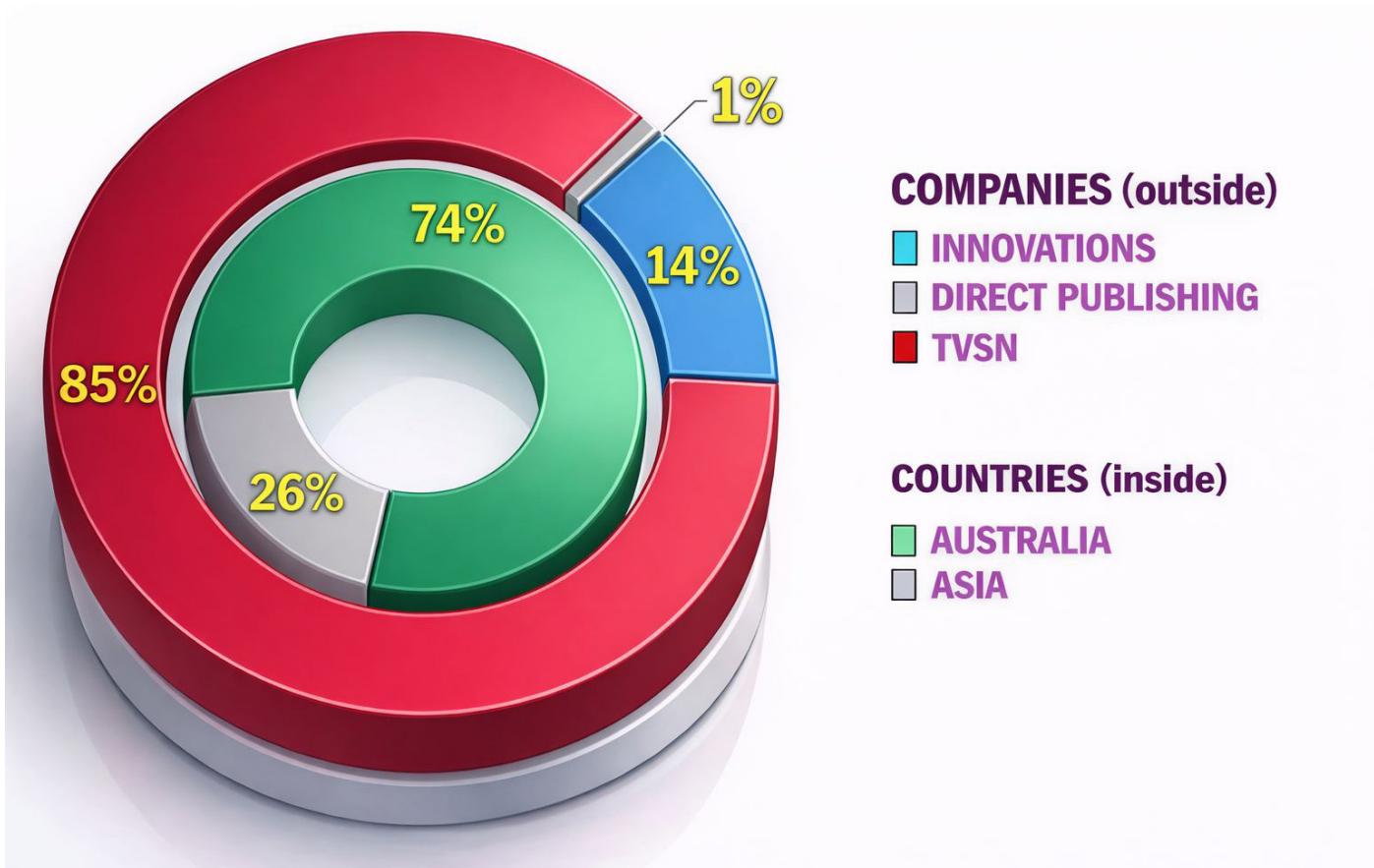
suburb of Sydney. The premises bring under one roof our administrative, marketing, TV studio, customer care hub, logistics and warehousing pickers and packers.

Direct Group is an equal opportunity employer of close to 300 full-time, part-time and casual, culturally diverse and well-integrated team members. We aim for an open and common-sense culture.

The composition of our staff location is illustrated in the graphic below.

As a Sydney suburban local business, our community is important to us.

We operate a sustainable business striving to create the lowest possible environmental footprint.



We appreciate that we need to be a good corporate citizen and we uphold the values of responsibility, duty of care and practical generosity.

We support several charities across a wide spectrum of causes. These include: The Sebastian Foundation, Dress for Success, Royal Far West, PanKind and Northern Beaches Women’s Shelter.

Our staff numbers worldwide are summarised as follows:

Australia

Total employees including estimated extended workforce total approximately 177 permanent full-time employees, 28 part-time employees and contractors and 92 casuals (during peak sales periods).

By duties:

- Corporate head office staff including contractors
- Studio (production, models, presenters)
- Customer care escalation hub
- Warehouse (in-house and associates)

Philippines

Customer Contact Centre (outsourced): 46 agents and 6 managers.

Asia

Product sourcing and supply management, publishing advertising sales and Asia customers support.

OUR SUPPLY CHAIN

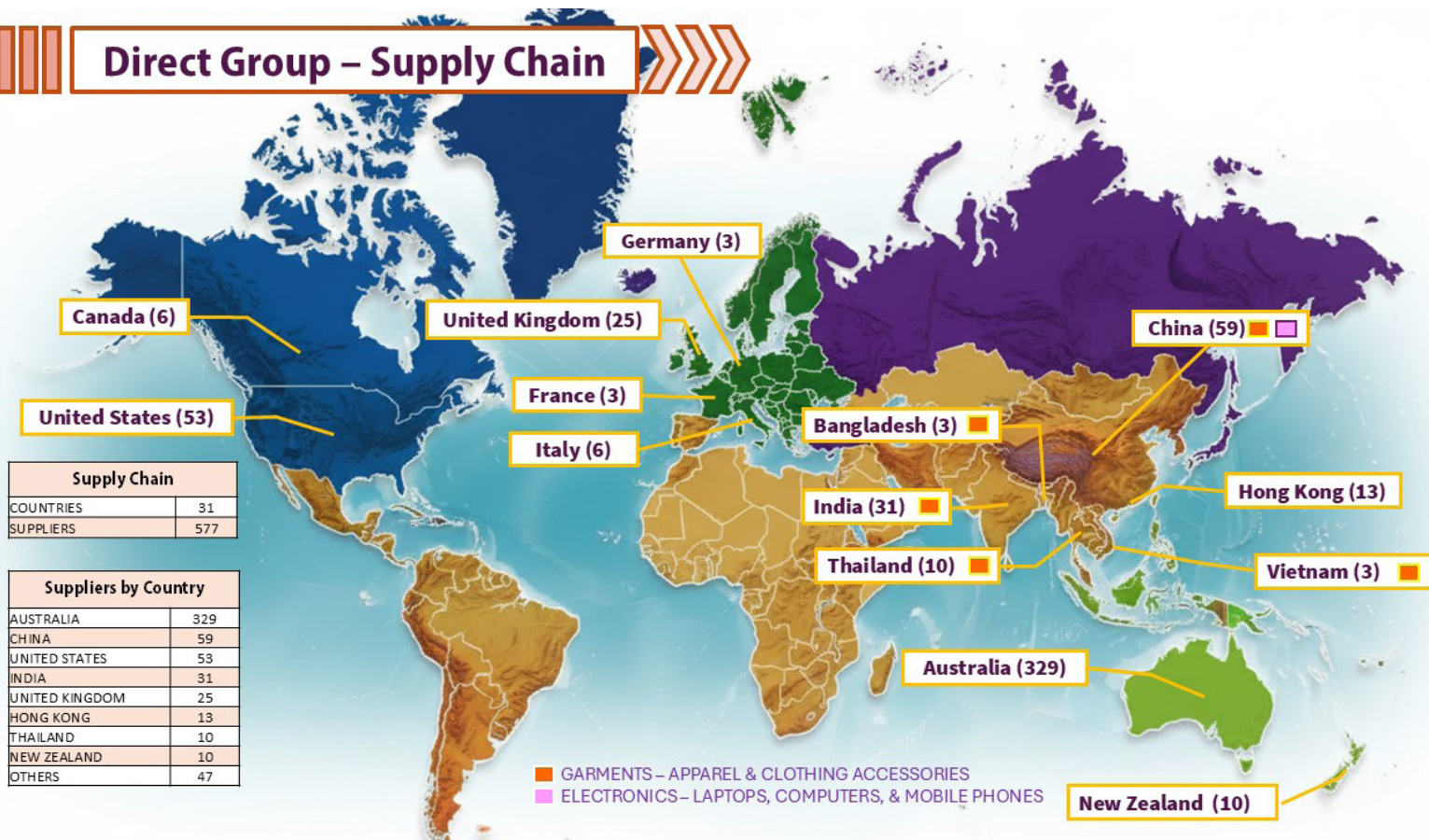
The Direct Group’s sourcing processes are extensive. We source products around the globe, from almost 35 countries, with both local and international teams devoted to product sourcing, procurement, quality control, fulfilment and freight forwarding to our Sydney warehouses.

We have good working relationships with each of our suppliers, factories and agents and we continually work and communicate closely with them to ensure that the environment in which our products are made is safe, fair, sustainable and responsible.



| Staff by location | |
|----------------------------------------------------------------|-----|
| Australia | 282 |
| China | 9 |
| India | 6 |
| Taiwan | 1 |
| Singapore | 2 |
| Hong Kong | 2 |
| Malaysia based contractors | 2 |
| Philippines (outsourced contact centre 46 agents + 6 managers) | 52 |

Direct Group – Supply Chain



Direct Group does not manufacture goods directly and does not carry a Private Label.

Third Party Brands – An arrangement through which we buy a selection of domestic and international brand merchandise from wholesalers/suppliers and then sell the products to customers via websites, catalogues and our TV channel.

Non-Trade Procurement – Where goods and services are supplied to Direct Group to support the operation of our business, including Information Communication Technologies, logistics, packaging, cleaning, landscaping, building maintenance, security services. Our trading arrangements with suppliers are managed through our business, each with its own set of agreements and procedures. The suppliers who provide the goods we sell are managed through Merchandise Buying Teams.

Suppliers engaged in non-trade procurement activities are managed by our head office. The head office has Legal support, including activities related to modern slavery compliance and risk management.

OUR FOOTPRINT

We believe transparency is essential in fulfilling our responsibility to respect human rights, as outlined in the UN Guiding Principles on Business and Human Rights (UNGPs)

Tier 1

Direct Group Corporate Suppliers: 108

Direct Group Merchandise Procurement Suppliers: 477

Direct Group Corporate Spend:

AUD 17 million

Direct Group Procurement Spend:

AUD 160 million

3. THE IMPLEMENTATION ROADMAP

Direct Group's modern slavery compliance measures roadmap to date is summarised in the table below.

| FY'19 | FY'20 | FY'21 | FY'22 | FY'23 | FY'24 | FY'25 |
|------------------------------------------------------|-------------------------------------|------------------------------------------------|-----------------------------------------|-----------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| Modern Slavery Certified Resource | Roll out updated | Procurement Resources Training | Accelerate Supplier Assessment Roll-out | Update all contracts and Purchase Orders | Undertook a review of the internal Modern Slavery Compliance Committee to add new members to represent high-risk areas within the business | Assessed training needs to address capacity gaps. Scaled up and enhanced staff training by including Red Flag risk escalation |
| Board Briefing | Asses Internal Risks Areas | Define DG Modern Slavery risks | Scale up and enhance staff training | Complete rolling-out Modern Slavery Questionnaires | Evolved our approach to supply chain due diligence through a deeper assessment | Commenced developing a specific Questionnaire for Tier2 supplier assessment |
| Formed Working Group: Modern Slavery Compliance Team | Key Resources Training | Covid 19-policy and impact | Response and Remediation Plan Scoping | Create an on-boarding process of new suppliers to include Modern Slavery Questionnaires | A compliance review of all the facilities service providers | Scope a possible database for ethical sourcing with suppliers and audit (questionnaires responses, factory visits details). |
| Initial Risk Assessment across the Value chain | Define Supplier Assessment Approach | Create a plan for Supplier Assessment Roll-out | Scope Supplier Assessment Tool | Process suppliers responses and asses red flags | Review our Labour Hire compliance policies | Review the Group Modern Slavery Code of Conduct in conjunction with the Whistleblower Policy and guidance |
| | | | | | Delivered updated modern slavery red flag training for first line employees | Start working on FY26 Sustainability Roadmap |
| Set Targets | First Public Statement | Second Public Statement | Third Public Statement | Fourth Public Statement | Fifth Public Statement | Sixth Public Statement |

4. OUR RISKS OVERVIEW

OUR APPROACH TO IDENTIFYING MODERN SLAVERY RISK

Without insights into operations and supply chains and conducting appropriate due diligence activities, even the best policies remain merely theoretical. Direct Group operates within multi-tiered supply chains where the risks associated with ethical sourcing and modern slavery are heightened by obscure visibility due to layers of sourcing via agents, geographic dispersion and language barriers.

We have been formally assessing modern slavery across our entire value chain since 2019 and in doing so we have considered the Act's guidance regarding sectors in which modern slavery has been found to take place, including high-risk countries, vulnerable populations, high-risk products/industries and high-risk business practices, such as sub-contracting and out-sourcing, where the visibility and control might be reduced. We have used the Global Slavery Index reference data, including its most recent 2025 release.

Using the information from our risk assessment in conjunction with our ongoing compliance

activities, we consider the most relevant types of modern slavery risk exposure for Direct Group to be forced labour, bonded labour, deceptive recruiting and the worst forms of child labour.

We recognise that the manufacturing facilities and service providers are not owned by us and mapping these areas of focus is a time-consuming task requiring ongoing effort.

Another challenge is that we are continually sourcing new products and onboard new vendors.

The global clothing, textile and food industry has been largely dependent on human labour. Globalisation of supply chains has increased the exposure to modern slavery and Direct Group is no exception.

SUMMARY AND ACTIONS

Team members (across relevant functions) have identified focus areas for assessing modern slavery risks across our entire value chain. The following table explains the rationale and nature of each risk including the workers it potentially affects. Section 5 outlines the actions in more details.



| Area | Potential Risk | Risk Explanation | Mitigating Actions |
|-----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| People indirectly hired via agencies | Low visibility of third party hiring | The people working for us and whom are not in our direct employment are under less direct control over the conditions of their engagement. We also use contractors who hire low skilled labour (e.g. cleaning services). | Contractual arrangements which incorporate modern slavery clauses into our contracts and limiting tiers of sub-contracting. Workforce training to identify potential signs of modern slavery. Support suppliers understanding of modern slavery compliance. |
| Sub-contracted service providers in our facilities | Workers in service areas identified as higher risk such as cleaners, landscape and building maintenance suppliers | We acknowledge that certain services we use in our facilities are considered high-risk for labour exploitation. | Limiting layers of subcontracting. Training and auditing our services providers, contractual arrangements including requirements for modern slavery clauses. Prominent whistleblowing hotline signs in areas of work. |
| Corporate Procurement | Workers producing goods and services sourced by our corporate formal procurement process | The majority of our corporate spend is low risk categories and takes place in Australia from relatively large suppliers. We also note a very low degree of potential risk in relation to our decentralised low value direct purchasing by staff. | Our team is trained to better incorporate modern slavery risk into their sourcing decisions, including contracts. Group Procurement principles, systems and policies including pre-screening suppliers to identify high-risk. |
| Procurement of merchandise products, print and fulfilment | Workers producing goods procured by Retail Merchandise for sale and Operations/ Logistics and Fulfillment teams | We source a range of goods for sale such as fashion, electronics, appliances imported directly, or via agents. Some of our suppliers are operating in industries and countries considered high-risk. | Use of Direct Group Procurement policies for merchandise sourcing including suppliers' due diligence, questionnaires and factory inspections. Merchandise team trained to better incorporate modern slavery risk assessment into their pre-screening, decision making, and contractual requirements. Collaborate with suppliers to join Sedex or Business Social Compliance Initiative (BSCI) to obtain assessment/certification. |

5. OUR FY'25 ACTIONS OVERVIEW

In FY'25 we aimed at ensuring accountability and transparency with respect to modern slavery compliance.

We continued to utilise a suite of tools to assess and address our risk of modern slavery. This includes policies, contractual agreements, self-assessment questionnaires and factory inspections deployed throughout our supply chain.

An internal Modern Slavery Compliance Team (MSCT) was previously developed with representation that included People and Culture (employee relations), process transformation, procurement, supply chain and logistics management, retail merchandise, governance and facilities management.

The MSCT reported to our legal counsel who in turn provided reporting to the Board.

The modern slavery compliance risks identified as the most likely to occur within our operation/ supply chain are:

- forced labour involved in the cultivation, harvesting and processing of cotton and similar raw input materials in our fashion procurement supply chain
- debt bondage within the cleaning services sector in our corporate services procurement supply chain
- deceptive labour recruitment practices
- child labour in the mining of raw input materials in our electronics products (such as cobalt), jewellery and beauty products (such as the mica colour additive)

Our internal assessment has identified these key contributing risk factors specific to our supply chains:

- low skilled labour
- temporary labour

- migrant labour
- strong pricing competition within the retail sectors that we operate in
- multi-level subcontracting
- extensive procurement of completed products and other input from suppliers in high-risk geographies

Facilities management, which includes cleaning, maintenance and security are labour intensive and are industries that feature subcontracting of migrant workers, this being where exploitation is more common.

Recruitment of temporary labour is used in our operations, but indirect employment or recruitment is avoided as much as possible to avoid the risk of deceptive recruitment.

We procure shipping, freight and logistics services that straddle both international and domestic freight and we also distribute to retail direct customers. These are areas that feature contract workers, sub-contracting and temporary labour.

We have developed an annual plan with goals and objectives and met to discuss and identify key risks and requirements and to oversee, escalate and monitor modern slavery compliance issues.



Key actions during FY25 included the following:

- We continued to build on work done on previous years and considered the vulnerability of people to exploitative practices, the categories of goods and services sourced and their country of origin.
- We have continued our process of updating and creating new policies that are aligned to our modern slavery policy and framework which guide our response and actions if potential modern slavery risks are identified.
- Continuing to create and deliver Modern Slavery capability building presentations, documentation and specific training with all relevant stakeholders (procurement, P&C, corporate services, warehouse/ contact centre).
- Mandating our suppliers, including contractors, to agree to and abide by our Code of Conduct.
- Continuing our process of updating our supplier agreements and purchase orders with terms and conditions that outline our expectations to our suppliers, mandating express warranties related to compliance with laws, including Modern Slavery laws.
- Continuing to initiate contact with our key local suppliers and key overseas suppliers to outline Direct Group's Modern Slavery program and expectations, understand those suppliers' own compliance initiatives, and commencing discussions with them regarding the need to work together to identify Tier 1 (new suppliers) and Tier 2 (existing suppliers located in high-risk geographies) supply chain risks.
- Implementation of a pre-screening approach with new suppliers that seeks to identify inherent risks related to supply category and country-of-origin. That also includes issuing Modern Slavery supplier guidelines and questionnaires, processing and analysis supplier responses and following up where risks are identified.
- Continuing to operate Direct Group's confidential Whistle-blower Policy and confidential contact channels so that all staff, suppliers and customers are aware that they can raise concerns about working conditions, how workers are treated, or regarding practices within our business and supply chain.

Direct Group conducted its annual review of its Modern Slavery compliance risks. In short, the review confirmed that the Direct Group's risk profile has largely remained unchanged for FY24, being that we remain unlikely to cause or contribute to modern slavery, but we are exposed to the risk of being indirectly linked to modern slavery through our supply chains, particularly on our Tier 2 supply chains, for which we are in process of developing a new supplier questionnaire. We had a dedicated resource responsible managing the DG Modern Slavery activity and for the preparation of the sixth Direct Group reporting cycle under the Act.

OUR GUIDING POLICIES AND PRINCIPLES

Direct Group has a range of policies and plans which underpin our commitment to actions against modern slavery.

| | |
|--------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Organisational Policies</p> | <ul style="list-style-type: none"> • Our corporate Direct Group Code of Conduct embodies our group wide commitment for addressing modern slavery. • Our Modern Slavery policy functions as a stand-alone policy document aligned to relevant standards and principles. • Our workforce arrangements including our policies and procedures are developed and maintained in accordance with relevant Australian workplace laws. • Our Group Whistle-blower Policy, Guidelines and Hotline provide a strong grievance voicing mechanism. • We have a clear Procurement Policy and framework which includes clauses addressing modern slavery risks. |
| <p>Sustainable Procurement Principles</p> | <ul style="list-style-type: none"> • Workplace health safety and wellbeing is never compromised. • Zero tolerance for harassment, abuse and discrimination. • Prioritise social enterprise, ethically certified goods. • No exploitative or forced labour. Wage practice must be fair. • Environmental impacts and hazards are minimised where possible. |
| <p>Supplier Code of Conduct</p> | <p>Included in all supplier contracts, agreements and purchase orders, the Direct Group Supplier Code of Conduct sets our minimum expectations of our suppliers to ensure suppliers do not use any child labour, force labour and operate according to recognised national and/or international standards.</p> |



MANAGING RISK IN OUR SUPPLY CHAIN

In FY'25 we further embedded our risk-based approach to managing modern slavery risk into our procurement process through the following three measures.

- We used our supplier pre-screening process to identify high risk suppliers in the supply category and country-of-origin, particularly strategic suppliers with potential for a long-term procurement relationship.
- Suppliers that are identified as medium or high risk in our pre-screen were advised to complete Sedex assessment, or similar recognised assessments. Alternatives were negotiated on a case-by-case basis where suppliers were not members of Sedex and membership was not able to be negotiated as a requirement.
- We broadened our approach to compliance assessment by accepting Business Social Compliance Initiative Certifications (BSCI) – India based.

Our processes are focused on higher risk areas, with four stages to our approach:

| Setting Standards | Assessing Risks | Managing Risk |
|-------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| Our Sustainable Procurement Principles underpin our approach | All suppliers over a spend threshold of AUD10,000 per annum are in scope | If gaps are found in the supplier's practices or management of modern slavery risks, we work with the suppliers to develop a Corrective Action Plan |
| We provide our Code of Conduct to our contractors, agents and suppliers | Our pre-screen assessment considers inherent risk of the product category and country of origin using The Global Slavery Index and where available Sedex data | Risks are escalated for decision making |
| Contractual clauses set out supplier obligations | Suppliers are required to complete Direct Group Modern Slavery Questionnaire | We conduct supplier audits and factory visits where relevant and feasible |
| We train procurement team members and people with purchasing authority | Questionnaire Responses are evaluated | We reserve the right to review the supply relationship should supplier not cooperate and improve performance |

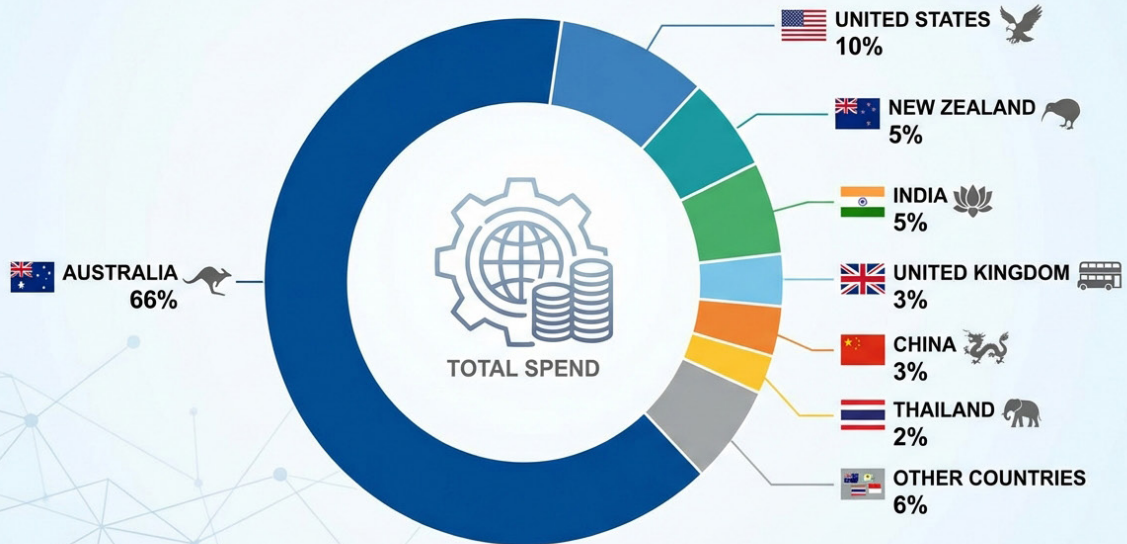
OUR SUPPLY CHAIN IN FY'25

In recent years we have developed a better understanding of the inherent risks within our sourcing categories by leveraging data from the Global Slavery Index. This enables us to perform more in-depth due diligence on suppliers that have greater potential risk of modern slavery practices within their own operations, thereby delivering a more effective approach to risk assessment.

In FY'25 Direct Group had a large bench of suppliers across our business operation, procuring goods and services. Key areas of spend included Products, Post, Print, Corporate Services, Warehousing, Call Centre, People and Professional Services, Information Technology & Telecommunications. Most of our spending occurs with direct suppliers in Australia. We acknowledge that goods and services supplied by our direct suppliers may not be manufactured or provided in those direct suppliers' countries, but on jurisdictions that are at higher risk for modern slavery.

Spend by Country

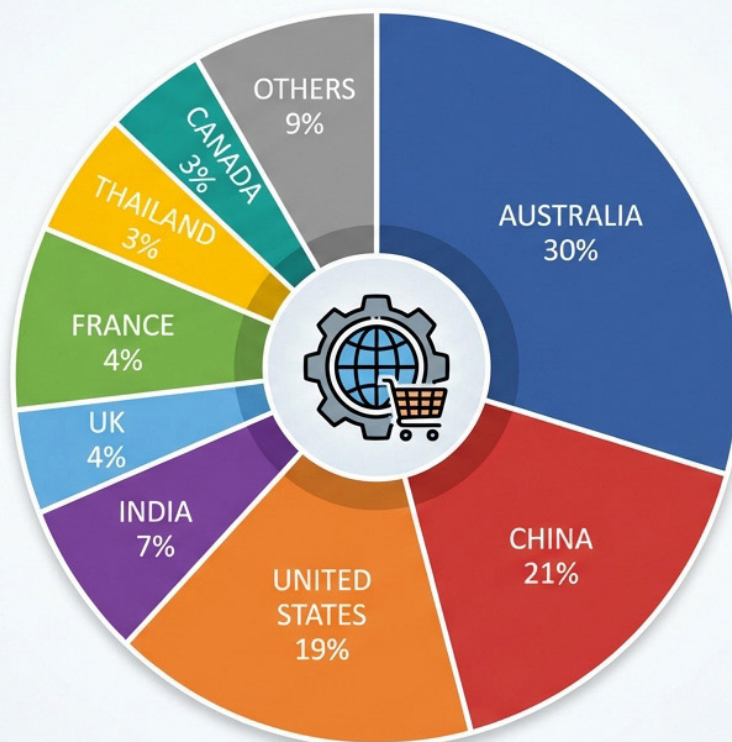
Direct Group – Procurement Spend by Country – FY25



Confidential | FY25 Data



Direct Group - Unit Procurement by Country - FY25



6. PROCUREMENT SUPPLIERS ASSESSMENT

We have continued our work on human rights and modern slavery assessment covering:

- Corporate continuous improvement processes
- Supply chain (fashion, general merchandise and jewellery) engagement
- Non-trade procurement and corporate services
- Operations, policies and protocols

A risk assessment has been completed to identify the vulnerability in the supply chain based on:

- geographic location
- type of products/services; and
- leveraging value of spend per country/ supplier to support compliance due diligence.

During the assessment process, we considered risks that may possibly cause, contribute and/or be directly linked to modern slavery practices, in accordance with the Australian Government's Modern Slavery Guidance.

We also took into consideration other risk factors such as the sector, industry, types of products and services, geographic locations and business models.

We used risks measuring indicators guidelines from Global Slavery Index 2025, corruption indices and labour rights provisions in various countries from where we source. We looked for NGO's and public information on locations with reported Forced Labour/Child Labour/Bonded Labour occurrences. We strengthened our internal policies for protecting Direct Group and its entities from Deceptive Recruitment and Bonded Labour Risks.

Most of our spending is in Australia (56%). All our large Australia based suppliers have Modern Slavery Policies in place, many of them lodging statements with the Modern Slavery Registry (banking, utilities, print, post and shipping vendors).

We acknowledge that goods and services supplied by our direct suppliers may not be manufactured, or provided in the direct suppliers' countries, but in jurisdictions that are at a higher risk of modern slavery.

We analysed Tier 1 supply chain per sourcing countries including Australia, US, UK, Italy, China, India, Thailand, Turkey, Bangladesh and Vietnam. We conducted modern slavery awareness training with our offshore employees based in India and China and they have conducted factory visits and work with key suppliers to provide relevant audit documentation.

We have circulated 118 Modern Slavery Questionnaires and by June'25 have received 96 responses. No supplier was deemed high risk; 16 suppliers were deemed medium risk due to their geographical location and the type of products we source from them. 12 of these suppliers were requested to provide Sedex SAQs and we were satisfied that some of the questions could not be answered due to limitation in the supplier structure and set-up. This is related mainly to small size suppliers who ultimately proved that they are actually managing effectively their labour force, especially in the health and safety aspects.

We had three key suppliers, two based in Australia and one based in Singapore, who requested a training session to further

understand the Modern Slavery Act's supply chain compliance requirements in order to be able to respond to our Assessment Questionnaires.

Based on the inherent risk of modern slavery within retail merchandise, due to

the product category and country of origin we source from, all new merchandise suppliers to Direct Group will need to complete the Questionnaire Assessment as a pre-screen step. After receiving the relevant documentation and assurance we will just then raise a purchase order.

MANAGING MODERN SLAVERY RISK IN OUR OWN WORKFORCE

Our Policy Framework

| Policy, Protocol or Mechanism | Description | Implementation |
|---------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| Employment Contracts | Formal legal agreements between Direct Group and team members that specify each party's responsibilities, including adherence to laws, codes and policies | Contracts are sent to successful upon the completion of all appropriate right to work in Australia checks and acceptance of offers |
| Awards/Enterprise Agreements (EA) | Formal agreements setting our terms and conditions of employment, wage rates, overtime rules and leave arrangements for team members | Agreements are negotiated periodically as per the agreed terms. Documentation is shared with each employee. |
| Employee Code of Conduct | Details the standards of behaviour and ethical conduct expected of team members | Details are shared upon the acceptance of their employment contract and housed on the intranet |
| Workplace Behaviour Policy | Clearly state any workplace behavioural obligations and provide guidelines on accessing support and resolving a complaint | Features periodical compliance training and is re-issued when a breach of the code has been identified |
| Discrimination, Harassment and Bullying Resolution Guidelines | State expectations and provide guidelines and processes for the resolutions of incidents of relevant concerns | Features periodical compliance training and is re-issued when a breach of the code has been identified |
| Whistleblower policy | Provide guidance on how improper or criminal conduct (such as instances of modern slavery) can be confidentially disclosed and how they might be investigated | Features in compliance training and is housed on intranet |

Continued p18

| Policy, Protocol or Mechanism | Description | Implementation |
|--------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ethics Hotline Procedure | Hotline calls, emails, complaints/ tip offs and Whistleblower complaints are received, escalated and appropriately managed with the help of a specialised third-party agency | Updated Hotline details are communicated through internal intranet channels. Updated posters have been strategically placed to ensure team visibility |
| Grievances and Dispute Resolution Policy | Designed to raise awareness about and provide a fair and just working environment by ensuring that team members have access to processes for the resolution of genuine personal grievances relating to the workplace | Managed by our internal People & Culture employee relations team confidentially, for both team members and managers, where appropriate |
| Supplier Agreements | Formal legal agreement between Direct Group companies and suppliers that clearly specify each part's responsibilities including about adherence to laws, codes and policies | Negotiated and signed prior to becoming a Direct Group supplier |
| Supplier Code of Conduct | Sets the expectations of our suppliers in relation to social, ethical and environmental issues, including health and safety and labour rights, including those related to modern slavery | The Supplier Code of Conduct is integrated with the Supplier Agreements. Suppliers agree to the Code when they sign the Supplier Agreement during the onboarding process |
| Ethical Sourcing – Factory Programs | This process and relevant documentation is under construction as part of FY'26 plans | FY'26 target |
| Guiding Principles when Dealing with Critical Non-Compliance | Provide practical guidance to support the management of critical non-compliance | An internal document, to be utilised by the sourcing teams when working with suppliers to address and remediate critical non-compliance |

We are committed to ensuring that any person who works for Direct Group is engaged, paid and treated in accordance with Australian workforce laws, including laws aimed at protecting vulnerable workers.

Modern award updates are actioned with relevant pay changes applied in accordance with Australian law (including changes to minimum wages), and regular reviews of pay compliance are conducted by our internal people and culture team.

We have a relevant whistleblowing policy and reporting framework (including third party independent hotline), however no modern slavery relevant reporting was received during FY'25.

We continue to limit subcontracting on key workforce segments and restricting it to just one layer.

Based on our assessment, the risk of modern slavery occurring in our direct operation and supply chain is relatively low.



No incidents of modern slavery or modern slavery like exploitation have been reported to date.

We acknowledge the need to work alongside with the government, NGOs and our peers to share information, knowledge and best practice in mitigating the modern slavery risks.

AWARENESS AND TRAINING

In FY'25 our focus was on continuing relevant Modern Slavery compliance training for our key employees in addition with support for procurement team members who were tasked with executing the pre-screening, Suppliers Modern Slavery Questionnaires and audits on our suppliers. This built on broad modern slavery training during previous years including how to identify red-flags relevant to Direct Group workforce as well as general awareness sessions.

Our training objectives were that:

- All employees have general awareness of key areas: ethical behaviour and incident reporting and can report all relevant issues and access appropriate grievance mechanisms
- All employees with purchasing authorities understand risks and make responsible sourcing decisions
- Relevant people with executive and functional responsibilities can identify risks and warnings signs and respond/escalate accordingly.

SUPPLY CHAIN GUIDELINES

Direct Group Supply Chain Guidelines aims to protect worker's rights and strengthen our supplier relationships, commitment to traceability, transparency, raw material sourcing and sustainability.

As part of our compliance our ethical trade principles cover:

Child Labour – the suppliers/ manufacturers and its subcontractors should not engage a worker under the legal age as stipulated by relevant country rules.

Forced Labour – the suppliers/ manufacturers and its subcontractor should not use any form of forced or coerced/prison labour.

Minimum Wages – wages paid should be at the minimum the specific country national benchmark prescribes.

Bribery or Corruption – The Direct Group will not tolerate under any circumstance the practice of bribery and corruption in any shape or form in dealings with suppliers or subcontractors, any of their employees, or associated parties or agencies.

We engage our suppliers directly and proactively to ensure they understand our requirements and they are supportive and responsive to our approach.

Representatives from Direct Group are regularly invited to engage in external forums including modern slavery and sustainability issues.

Our collaboration with Sedex provided information and assessments provides us valued resources and network.

RESPONSE AND REMEDIATION

We are continually working at improving our readiness response and remediation approach to deal appropriately with a potential modern slavery incident should one arise in our workforce or broader supply chain. We referred

to the Modern Slavery Act Guidance and UN Guiding Principles on how businesses can “make good” and remediate compliance issues.

Through our modern slavery program and by monitoring topical publicly available information, we have been able to determine the high-risk areas of our supply chain. The Group has traced most of the Tier1 supply chain and identified various risks levels to assist in focusing our assessment efforts correctly.

Direct Group conducts due diligence checks on new suppliers. In doing so we maintain an approved trusted supplier list prior to engaging with any potential new supplier.

The due diligence checks include, where possible, a major new and existing supplier factory visit and general assessment of working conditions. In addition to this, we require all existing suppliers to confirm to us that:

- There is no inconsistency with Direct Group Supplier Guidelines in any area of a supplier operation
- The suppliers are aware that we may

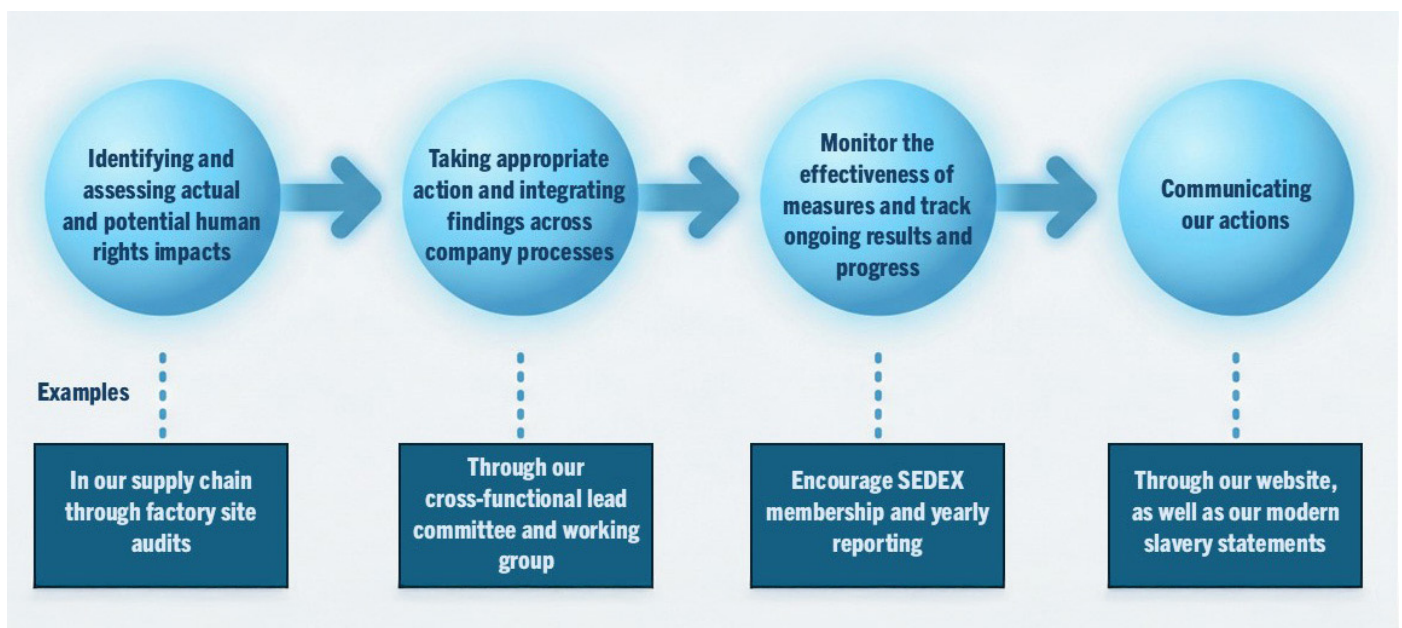
review our engagement at any time should any instances of modern slavery or any other “zero tolerance” type of breaches of human rights issues come to light

We reserve the right to terminate engagement with suppliers who do not transparently co-operate with us on remedial measures.

All our overseas employees are paid at least the relevant national minimum wage and paid holidays in line with local labour law/regulations applicable within their country of operation.

Buyers have had the required training to enable them to conduct supplier evaluation, undertake their own assessment, provide suppliers with relevant information on the aspects of modern slavery and escalate any non-compliance and potential risk.

We are in the process of covering most of the supply chain with Modern Slavery Questionnaires and assessing the received responses. In cases where remedial action is required, we will work closely with suppliers to be satisfied that improvements are made.



7 EFFECTIVENESS, REVIEW AND CONSULTATION

We monitor the effectiveness of our programme to ensure that slavery and/or human trafficking is not taking place within our business or supply chain by:

- Reviewing any reports received from employees, the public, or law enforcement agencies that indicate that modern slavery practices have been identified.
- Remediation and management reporting of breaches identified by our whistle-blower hotline.
- Conducting an annual review of our risk assessment process and compliance programme to ensure that they are relevant and up to date.
- We provide regular training and capacity building for our team members and overseas agencies; and
- We engage with stakeholders to maintain a proactive dialogue on our performance.

We consider both the process (ensuring we have effective grievance, reporting and escalation mechanisms in place to find out if there is an issue) and the outcome (ensuring we are equipped to act responsibly and address any adverse impacts).

Having a dedicated resource to manage Modern Slavery responsibility is a key mechanism in ensuring effectiveness of our actions. It allows focused planning and accountability across key functions and to the executive sponsor and ultimately to the board.



| Area | Objectives | Effectiveness Indicators | Outcomes in the Reporting Period |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policies and contractual controls | <ul style="list-style-type: none"> Ensure our policies set clear expectations around preventing and addressing all forms of modern slavery across our operations and supply chain Ensure policies are meaningfully implemented Policies to provide modern slavery prevention and protection for workers against it | <ul style="list-style-type: none"> Policies reviewed on regular basis (internal and external) Percentage of staff and suppliers and staff covered by agreements/contracts and our codes Percentage of suppliers and factories audited against compliance with relevant policies Staff have ready access to policies related to modern slavery Suppliers have ready access to policies related to modern slavery | <ul style="list-style-type: none"> 100% 100% 85% 100% 100% |
| Risk assessment | <ul style="list-style-type: none"> Understanding and monitoring our exposure to modern slavery risks | <ul style="list-style-type: none"> Number of supply chain suppliers traced Number of risk assessments conducted Number of supplier sites on high and extreme risk ratings | <ul style="list-style-type: none"> 85% 35 Nil |
| Awareness raising and capacity building | <ul style="list-style-type: none"> Modern slavery awareness training for internal staff and suppliers to ensure appropriate staff have knowledge of risks, prevention and remediation Improve external awareness and transparency related to modern slavery risks | <ul style="list-style-type: none"> Number of staff trained on modern slavery and broader human rights risks and review of feedback from training sessions Number of suppliers trained on modern slavery and broader human rights risks | <ul style="list-style-type: none"> New 45 Refresher 18 12 |
| Audits and Issue monitoring | <ul style="list-style-type: none"> Supply chain monitoring and assurance Ensure quality and effectiveness of audit types Audit corrective actions are undertaken, improved, or closed | <ul style="list-style-type: none"> Percentage of factories reviewed in our auditing program Number of critical issues identified Number of modern slavery issues identified Number of Non-Trade Procurement suppliers who publish modern slavery statements Reviewing ethical audit trends over time including number and % of non-compliance by type | <ul style="list-style-type: none"> 80% of strategic suppliers in India and China Nil Nil 26 No Modern Slavery Cases |

8 FY'26 NEXT STEPS

Direct Group is committed to continually improve our efforts to combat modern slavery and we recognise that this requires an ongoing multifunctional program of work. Through our Modern Slavery Compliance Team, we will continue to manage and identify modern slavery risks in a continually evolving business transformation, internal structure and supply chain.

Our past years progress of creating the existing compliance framework and embedding policies is offering us a strong base from which to evolve and improve going forward in FY'26.

We acknowledge the real challenges we face with traceability in our supply chain beyond direct suppliers, but we are committed to pushing the boundaries and deepening our knowledge of Tier 2 and beyond.

During FY'26, as we will update our Risk Management Framework, we will further tailor and refine a strategic risk-based approach to identifying and eliminating modern slavery risk from our supply chain. This is a testament to our dedication to ethical practices, social responsibility and our mission to contribute to eradicating any modern slavery from our value chain.

We expect the finalisation of the corporate risk management framework will result in further actions to those identified below.



Over the next year, our Modern Slavery compliance key focus areas will include:

Targeted and deeper assessment of high-risk suppliers

- In FY'26 we will focus our efforts on pre-screening new suppliers and conducting detailed assessments and auditing for high-risk suppliers as we identify them.
- Progress beyond Tier1 to start auditing Tier2 suppliers, focusing on factories that are involved in modern slavery at-risk regions with a significant value contribution to strategic suppliers including piloting a trial for key Non-Trade Suppliers.
- We will continue to assess our facilities services providers to make sure there are no gaps in their policies.
- We will investigate methods for assessing compliance of underpayment and visa compliance of all our third-party service providers and agents.

Deliver enterprise-wide initiatives to improve management of modern slavery

- Anti-Slavery Day (18 October) awareness will be popularised among all colleagues to raise its profile.
- Implement an Anti-Slavery training module as part of our internal Learning Management System with induction and refresh training modules for key functions.
- Review and update regularly our modern slavery risk profile to accommodate changes in the business operations.
- Refresh core modern slavery training modules for procurement teams.

All the above procedural controls will be annually reviewed to ensure that we have robust processes in place to minimise the risk of modern slavery in our operations and supply chain.

9 MODERN SLAVERY ACT MANDATORY REPORTING CRITERIA



This Statement has been prepared to address the seven mandatory criteria outlined in the Act. The table below indicated where each criterion is addressed within the sections of this Statement.

| Criteria | Relevant Section in Statement |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| Identifying the reporting entity | Introduction and Scope |
| Describe the structure, operations and supply chain of the reporting identity | Our Structure and Supply Chain |
| Describe the risks of modern slavery practices in the operation and supply chain of the reporting entity and any entities that the reporting entity owns or controls | The Implementation Roadmap Risks Overview |
| Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes | Actions Overview Procurement Suppliers Assessment Effectiveness, Monitoring and Remediation |
| Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks | Effectiveness |
| Describe the process of consultation with any entities that the reporting entity owns or controls | Review and Effectiveness |
| Any other relevant information | FY'26 Next Steps |

Additional resources:

- Commonwealth Modern Slavery Act – Guidance for reporting entities
- UN Guiding Principles on Business and Human Rights
- OECD Due Diligence Guidance for Responsible Business Conduct
- United Nations Global Compact 'Decent Work Toolkit for Sustainable Procurement'
- 2023 Global Slavery Index
- WalkFree Foundation Global Slavery Index

STATEMENT APPROVAL

This statement pursuant to the Australian Modern Slavery Act 2018 (Cth) was approved by the Board of Direct Digital Group Holdings Pty Ltd in their capacity as principal governing body of Direct Digital Group Holdings Pty Ltd in December 2025 and constitutes the statement for the year ended 30 June 2025.

This Statement was signed on behalf of the Board of Directors by:



Bernie Brookes
Chairman of the Board

Date 3rd March 2026

