

Modern Slavery Statement 2025

Octopus Deploy Pty Ltd (ACN 160 339 186)

This Modern Slavery Statement is prepared on behalf of Octopus Deploy Pty Ltd (**Octopus Deploy, we, our or us**). Octopus Deploy Pty Ltd is a proprietary limited company headquartered in Brisbane, Australia.

Octopus Deploy is committed to upholding human rights and working to prevent modern slavery in all its forms. We recognise our responsibility to safeguard that the risk of slavery, servitude, forced labour, and human trafficking are reduced within our business operations and supply chains. This Statement outlines the steps we have taken during the financial year ending 31 June 2025 to assess and manage the risk of modern slavery in our operations and supply chains.

This Statement has been produced in accordance with section 13 of the Australian *Modern Slavery Act 2018* (Cth) and section 54 of the United Kingdom Modern Slavery Act 2015.

About Octopus

Octopus Deploy was founded in 2012. Its eponymous software, Octopus Deploy, is a software deployment automation tool designed to help development teams automate the release and deployment of their applications. It simplifies the process of deploying software to various environments (e.g., development, testing, staging, production) while maintaining reliability and auditability.

In March 2024, Octopus Deploy acquired Codefresh, a CI/CD platform designed for cloud-native applications, particularly those built with Docker, Kubernetes, and serverless technologies. It aims to help development teams automate and streamline the entire software

development lifecycle, from building and testing code to deploying applications in various environments.

As of 30 June 2025, Octopus Deploy's group comprises Octopus Deploy Pty Ltd, an Australian company and the ultimate parent, and five subsidiaries in New Zealand, the United Kingdom, the United States, and Israel. Collectively, these companies employed approximately 340 employees and contractors in 18 countries. Our total revenue for the financial year ending 30 June 2025 was approximately USD \$73.6M.

Our supply chain

Given that Octopus Deploy's core business focuses on software development and associated services, we have limited reliance on supply chains for physical goods, with the exception of ICT hardware, company apparel, and office equipment and sundries.

Octopus Deploy procures its ICT hardware from a combination of electronics manufacturers and third-party electronics distributors. Octopus Deploy acknowledges that the electronics sector involves extensive and complex supply chains with many tiers of suppliers performing specialised roles, ranging from the extraction and manufacture of source materials, product assembly, logistics and customer support.

Octopus Deploy engages a range of professional services to support its core business. These service providers are based largely in Australia, the United States of America, and the European Union, which have strong labour laws and regulations that help protect workers' rights. Octopus Deploy also engages facilities management services in respect of its offices.

Modern slavery risks - our operations

Due to the nature of our business, our employees are not considered to be vulnerable to slavery, forced labour, or human trafficking. Despite this low risk, we endeavour to act in ways which ensures fair and safe working practices and complies with all relevant employment laws and regulations, including:

✓ Hiring processes.

Our employees are primarily located in highly developed regions such as Australia, the United States of America, or the European Union, which have strong labour laws and regulations that help protect workers' rights. In the financial year ending 30 June 2025, we

have taken steps to reduce our exposure to countries with lower standards of workers' rights. We also maintain background check policies in compliance with ISO27001:2022 standards which would inherently also identify potential concerns about the circumstances of a prospective employee that may be exposed to circumstances suggesting modern slavery, such as right-to-work.

✓ **Pay transparency.**

We offer full pay transparency for our non-executive roles. Salaries are also reviewed and benchmarked twice annually, solely against each role in each region, and agnostic of any individual's particular characteristics such as gender, sexual orientation, marital status, political affiliation, religious or spiritual beliefs, etc.

✓ **Supporting vulnerable employees.**

We offer benefits available to all employees who may be vulnerable to exploitation, including a domestic and family violence policy which provides unlimited paid family violence leave, means of redirecting salary or salary information to alternative addresses, flexible working arrangements, and access to counselling.

Modern slavery risks - our supply chain

Our company's structure, industry, geographical focus, and commitment to remote work naturally position us with a reduced risk of encountering modern slavery compared to many other organizations. This is due to several key factors:

- **Limited physical goods:**

Our core business focuses primarily on software development and associated services. This significantly reduces our reliance on physical supply chains where forced labour and other forms of exploitation are more common.

- **Supplier management:**

Like our employees, our suppliers are primarily located in highly developed regions such as Australia, the United States of America, or the European Union, which have strong labour laws and regulations that help protect workers' rights.

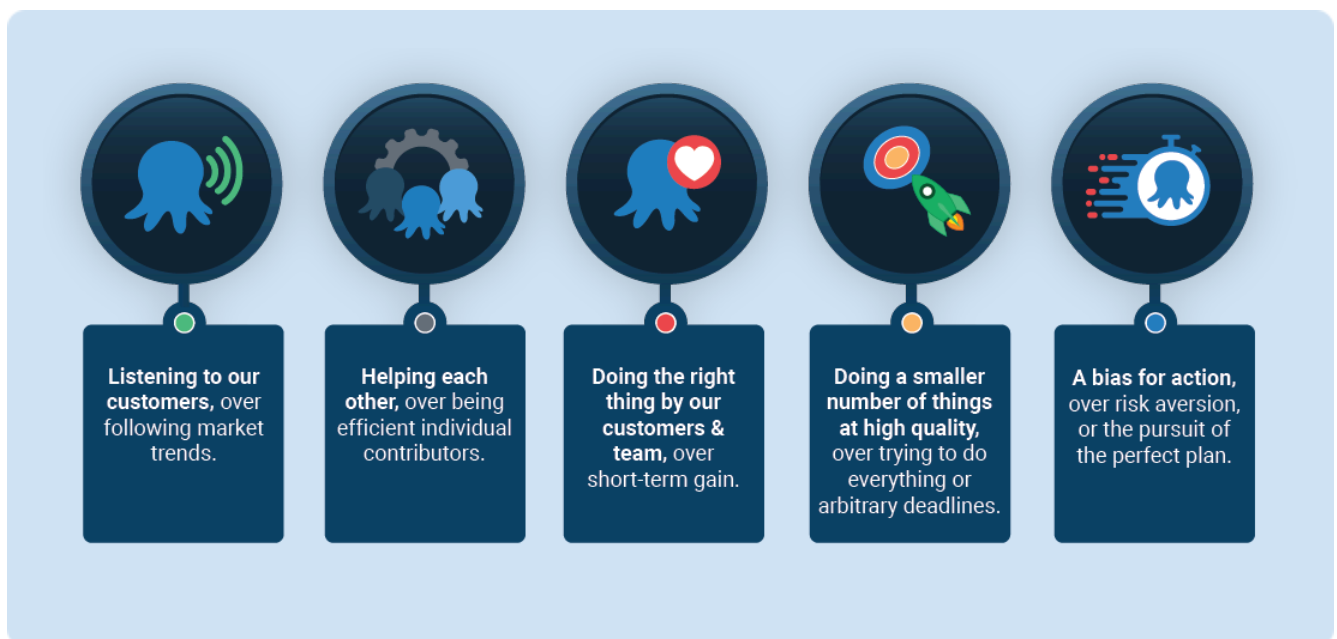
Notwithstanding this, certain goods procured by Octopus Deploy carry increased modern slavery risks among second and subsequent tier suppliers.

Octopus Deploy recognises that electronics goods, particularly those manufactured in China, Malaysia and Pakistan, are linked with an increased prevalence of modern slavery. Octopus Deploy also understands that there may be additional risks of modern slavery associated with second and subsequent tier suppliers that extract and/or manufacture materials used in the ICT hardware we procure.

Our approach to addressing modern slavery risks in our supply chains are set out below.

Our approach to modern slavery

Octopus Deploy recognises the serious global issue of modern slavery and the importance of corporate responsibility in addressing it. We believe that conducting business ethically and respecting human rights are fundamental principles that underpin our operations. We strive to maintain a workplace and supply chain that are free from exploitation and uphold the dignity of all individuals involved in our business activities, as reflected in our five key company values:



We understand that ethical considerations are not static and acknowledge that complex global supply chains and engagement with certain sectors can increase the potential for labour exploitation. As our company evolves, we are alert to the need for regular assessment of our practices and due diligence processes. Only ongoing vigilance can ensure that we can promptly identify and address any potential risks, upholding our legal and ethical responsibility to reduce the risks of modern slavery.

We have the following measures in place to specifically address modern slavery risks:

- **Grievance processes:**

We maintain whistleblower policies in accordance with ISO27001:2022 and SOC 2 to enable the reporting of concerns including modern slavery risks.

- **Streamlined supply chain:**

Unlike companies with complex, multi-tiered supply chains, ours is relatively straightforward. This makes it easier for us to monitor and track the origin of our goods and services, reducing the risk of hidden exploitation.

- **Supplier management:**

By carefully managing our supply chain and selecting our suppliers with diligence, we minimise the potential for modern slavery risks within our business model. We remain committed to transparency and accountability, and we believe that our approach to supply chain management is a key factor in our overall commitment to ethical business practices.

Assessing the effectiveness of our approach to modern slavery

Octopus Deploy is committed to continually assessing our approach to modern slavery and remaining vigilant to potential risks, ensuring that our ethical standards are not only maintained but also strengthened over time.

Octopus Deploy's Compliance team is responsible for reviewing the effectiveness of the measures we have put in place to identify and minimise modern slavery risks in our ICT vendor supply chain. Octopus Deploy's People & Culture team has these responsibilities in our relevant employment and professional service provider supply chain.

We acknowledge that responsibility for reducing modern slavery is ongoing and constant vigilance is necessary. As our business and regulatory environment continues to evolve, such efforts may include:

- **Employee training:**

New or further training to our employees and suppliers on modern slavery risks and how to identify and report potential red flags.

- **Formal risk assessment:**

Further integrating modern slavery risk assessments into every stage of our vendor relationships, from initial selection and onboarding to ongoing monitoring and contract renewals.

- **Risk automation:**

Further leveraging technology to automate and streamline due diligence processes, enabling us to gather and analyse data more efficiently and identify potential risks early on.

- **Industry participation:**

Further participating in industry forums and initiatives, sharing our experiences and learning from others to collectively raise the bar for ethical business practices.

- **Active monitoring:**

Monitoring and responding to global trends, sectoral impact and regulatory developments related to modern slavery and reviewing our practices against those legal and ethical standards.

Consultation

Octopus Deploy provided a copy of this Statement to each of its subsidiaries and invited feedback.

Approval

This Statement has been approved by the Board of Octopus Deploy and signed with the authority of the Board of Octopus Deploy by:



Paul Stovell

Co-Founder, Managing Director & CEO

3 December 2025