



TECHNOLOGY & INFRASTRUCTURE



**MODERN SLAVERY  
STATEMENT  
2025**

## **INTRODUCTION**

CPS Technology & Infrastructure Pty Ltd ACN 148 905 159 ('CPS', 'we', 'us' and 'our') has substantial experience in providing telecommunications and infrastructure solutions in Australia. We recognise the complex and evolving nature of modern slavery and the responsibility we bear in mitigating risks of modern slavery in our operations and supply chain.

We submit this Modern Slavery Statement (**Statement**), our second in line with the requirements of the *Modern Slavery Act 2018* (Cth) (**the Act**). CPS is an Australian entity with an annual consolidated revenue of at least \$100 million and is therefore deemed a 'reporting entity' under the Act. This statement covers the period from 1 July 2024 to 30 June 2025.

In 2025, our Modern Slavery strategy has been structured around the following three fundamental pillars:

- i. Policies, Processes and Procedures;
- ii. Awareness; and
- iii. Due Diligence.

Each pillar has been designed to uphold human rights, promote ethical practices and mitigate the risk of modern slavery in our supply chain and operations. In Section 10 we discuss in further detail our achievements under each of these pillars and the effectiveness of actions taken.

### **Modern Slavery Act 2018 (Cth)**

This Statement addresses the mandatory reporting criteria set out in clause 16 of the Act as outlined in the table below.

<b>Modern Slavery Act 2018 (Cth) criteria</b>	<b>2025 CPS Modern Slavery Statement Reference</b>
Identify the reporting entity	<ul style="list-style-type: none"><li>• Introduction</li></ul>
Describe the structure, operations and supply chains of the reporting entity	<ul style="list-style-type: none"><li>• About Us</li></ul>
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	<ul style="list-style-type: none"><li>• Risks in our operations and supply chain</li></ul>
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	<ul style="list-style-type: none"><li>• Managing modern slavery risks in 2025</li></ul>
Describe how the reporting entity assesses the effectiveness of such actions	<ul style="list-style-type: none"><li>• Effectiveness of actions taken</li></ul>
Describe the process of consultation with any entities the reporting entity owns or controls	<ul style="list-style-type: none"><li>• Consultation</li><li>• Future actions</li></ul>
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	<ul style="list-style-type: none"><li>• Consultation</li><li>• Future actions</li></ul>

## **A MESSAGE FROM OUR CEO**

Modern slavery is a global challenge that affects an estimated 50 million people either through forced labour, child slavery, debt bondage, human trafficking, or other exploitative practices<sup>1</sup>.

At CPS, we remain unwavering in our commitment to uphold respect for human rights, and we recognise the complexity of modern slavery. Over the most recent reporting period, we have taken proactive steps to identify, assess, and mitigate modern slavery risks across our operations and supply chains, including:

- Introducing enhanced due diligence for potential suppliers through our Supplier Screening Protocols and Onboarding Process and incorporating mandatory criteria for supplier selection;
- Strengthening supplier engagement and oversight via deployment of our new Supplier Management Platform;
- Rolling out comprehensive training programs and targeted learning sessions for all employees and senior leadership to deepen the understanding of modern slavery issues within the organisation;
- Strengthening our grievance mechanisms to ensure more effective reporting and resolution pathways; and
- Enhancing governance structures and organisation policies by implementing a Modern Slavery Policy and expanding both our Supplier Code of Conduct and Employee Manual to address modern slavery risks.

This Statement also identifies the future actions and priorities at CPS for the next reporting period.

With a workforce and partners that span international borders, we are dedicated to evolving our practices in line with legislative requirements and the highest ethical and social expectations of our stakeholders.

Looking forward, CPS will continue to refine our approach, driven by a commitment to continuous improvement and collaboration with our suppliers, employees, business partners, and other stakeholders. We remain vigilant and transparent, knowing that the path to eliminating modern slavery demands sustained effort and collective action.

Together, we can help shape a future where dignity, safety, and respect are fundamental rights for all.



**Rhys Morgan**  
Chief Executive Officer  
CPS Technology & Infrastructure Pty Ltd

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<sup>1</sup> Anti-Slavery International, 2025. [What is modern slavery? Available from https://www.antislavery.org/slavery-today/modern-slavery/.](https://www.antislavery.org/slavery-today/modern-slavery/)

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## **2. OUR STRUCTURE**

In June 2024, CPS underwent a re-structuring. The new corporate structure positions CPS Holdco Pty Ltd as the ultimate parent entity, with CPS Bidco Pty Ltd as its subsidiary and direct parent of CPS. As part of this re-structure, an experienced board of directors was appointed, while the Chief Executive Officer and senior leadership team retained responsibility for overseeing daily operations, executing strategy, and driving organisational objectives. Throughout the reporting period, CPS remained committed to enhancing its five-year strategic business plan and focused initiatives aimed at fostering growth, strengthening organisational maturity, and promoting diversity across all areas of the organisation.

## **3. OUR OPERATIONS**

During the reporting period, CPS delivered services exclusively to clients within Australia.

CPS employs a nationally integrated delivery model to efficiently manage the procurement and implementation of telecommunications and infrastructure services for network operators, infrastructure owners, and additional customers nationwide.

During the reporting period, our workforce was comprised of 196 full-time employees, 3 part-time employees, 1 full-time contractor, and 1 independent contractor based in Australia. In addition to 13 full-time employees located in the Philippines.

At CPS, we champion flexible working arrangements, empowering our employees to fulfil their responsibilities remotely, whether from home or on-site, as dictated by their specific roles. In response to robust consumer demand for enhanced connectivity, our operational footprint now extends nationwide. As a result, our workforce is progressively expanding to cover metropolitan centres as well as regional, rural, and remote locations across Australia.

We operate warehouse facilities in Brisbane, Sydney, and Melbourne to support logistics and inventory management and to allow for flexible responses to changing customer needs. Our corporate operations are managed across three national offices in Brisbane, Sydney, and Melbourne, with satellite offices in Wagga Wagga and Manilla.

## **4. OUR SUPPLY CHAIN**

Our supply chain is structured to support high-volume and rapid deployment, with expenditure primarily focused on project delivery, including the procurement of materials and equipment necessary for telecommunication and infrastructure services. Sourcing practices follow customer requirements and are regulated by commercial framework agreements to ensure ethical standards, legal compliance, quality assurance and timely completion.

To strengthen and extend our internal expertise, CPS collaborates with a carefully selected network of subcontractors. These partnerships are governed by robust framework agreements designed to uphold rigorous standards in labour practices, safety, compliance, and performance. This approach ensures the consistent delivery of high-quality services while upholding our organisational commitment to ethical, responsible operations and the safeguarding of human rights.

In our three key Framework Agreements with suppliers, we place the following obligations on the supplier to help mitigate modern slavery risks:

- compliance with all applicable laws, regulations and standards relating to modern slavery, including the Act;

- requirements that the supplier has their own policies and procedures to ensure compliance with all applicable laws, regulations and standards relating to modern slavery, including the Act;
- requirements that the supplier take reasonable steps to ensure there is no modern slavery or human trafficking in its supply chains, including the implementation of due diligence procedures within its own supply chains;
- warranties that the supplier and any of its personnel have not been convicted of any offence relating to modern slavery legislation and they are not subject to any investigation or inquiry in relation to modern slavery; and
- the requirement to immediately notify CPS if the supplier becomes aware of any actual or suspected breach of the above.

CPS had approximately 500 suppliers in the reporting period. The largest portion of suppliers were for services and goods acquired to directly support customer projects. Technical integration and specialist construction services also represented a large proportion of the services that CPS contracted through its supply chain. Where possible, CPS seeks to contract with Australian entities only. However, there are circumstances where Australian suppliers may have manufacturing operations, or a parent company based offshore.

Given the geographically diverse nature of our project deployments, CPS facilitates the provision of specific materials and equipment such as antennas, cabling and associated ancillary materials, to subcontractors via established onshore logistics channels. These resources are supplied to ensure the seamless execution of customer projects and the achievement of operational objectives.

In the reporting period, almost all spend by CPS was in Australia. The majority of the spend was allocated to goods for customer projects including steel telecommunication poles and towers, prefabricated outdoor shelters, cabling and peripheral telecommunication equipment. Much of the steelwork that CPS acquired was manufactured in Australia. However, some components were manufactured overseas, predominantly in Asia. It must be noted that CPS customers often dictate the suppliers from whom we must acquire certain equipment and materials, and those parties are subject to rigorous policies and procedures, including codes of conduct to prevent modern slavery risks.

Complementing our onshore subcontractors, CPS also uses two offshore companies in India and Macedonia for niche design services.

## **5. MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN**

CPS recognises the inherent modern slavery risks within both our operations and supply chain due to geographical factors and industry specific factors. We are committed to continuously identifying, assessing, and addressing potential instances of exploitation that may occur in the sectors and regions where we conduct business.

The fundamental modern slavery risks identified within our operations and supply chain in the 2025 reporting period are:

- Direct workforce onshore;
- Direct workforce offshore;
- Indirect workforce onshore; and
- Acquisition of goods and materials manufactured offshore.

## 6. RISKS IN OUR OPERATIONS

### **Direct workforce onshore:**

The workforce composition at CPS is largely Australian based, where employees benefit from strong workplace legislation in Australia. According to the Global Slavery Index, the risk of modern slavery in Australia is lower than many other jurisdictions<sup>2</sup>.

CPS acknowledges the unique risks inherent in delivering design and construction services within the telecommunications sector. While CPS maintains a limited team of internal riggers and technicians to address these specialised roles, recruitment within Australia presents significant challenges. Accordingly, CPS employs seven skilled professionals from the Philippines in this pool, whom we sponsor through the 482-visa program.

Furthermore, CPS employs 10 professionals whose positions are also supported by an appropriate visa sponsorship program.

Despite these efforts to address labour shortages locally, CPS remains alert to the increased modern slavery risks associated with sourcing skilled workers internationally, particularly through visa sponsorship programs. We are committed to upholding fair employment standards and ensuring that all externally recruited personnel—whether onshore or offshore—are engaged under conditions that meet or exceed local legislative requirements. CPS continually reviews its recruitment and employment practices, working in concert with trusted service providers, migration agents and adhering to relevant frameworks to safeguard against exploitation.

### **Direct workforce offshore:**

CPS employs 13 design, administrative and support employees based in the Philippines via an Australian service provider. The parties have a Framework Agreement in place to ensure all employees are remunerated in accordance with local Philippine legislation and regulations at a minimum and employees are entitled not to work their own local public holidays. According to the Walk Free Global Slavery Index, “the Philippines is outperforming its neighbours in its efforts to address modern slavery. The government had the second strongest response to modern slavery in the Asia Pacific region”<sup>3</sup>. However, modern slavery remains prevalent in the Philippines, with the Walk Free Global Slavery Index estimating that 7.8 people for every thousand people in the Philippines is experiencing modern slavery<sup>4</sup>. These statistics show that we must maintain vigilance regarding risks associated with offshore employment practises.

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<sup>2</sup> Walk Free Global Slavery Index, 2025. *Modern Slavery in Australia*. Available from <https://www.walkfree.org/global-slavery-index/country-studies/australia/>.

<sup>3</sup> Walk Free, Global Slavery Index, 2025. *Modern slavery in The Philippines*. Available from <https://www.walkfree.org/global-slavery-index/country-studies/the-philippines/>.

<sup>4</sup> Walk Free, Global Slavery Index, 2025. *Modern slavery in The Philippines*. Available from <https://www.walkfree.org/global-slavery-index/country-studies/the-philippines/>.

## **7. RISKS IN OUR SUPPLY CHAIN**

### **Indirect workforce:**

We recognise that construction, logistics, and facilities management services pose the greatest risks in our supply chain. These industries often rely on manual, low-skilled labourers which makes these individuals particularly susceptible to potential modern slavery practices.

It is therefore necessary for CPS and its suppliers to ensure that best practice work health and safety frameworks are in place to protect these individuals. CPS is currently certified to ISO45001 and holds a WH&S accreditation from the Office of the Federal Safety Commissioner.

As the construction, logistics and facilities management services that CPS acquires are almost exclusively onshore in Australia, we believe this poses a lower modern slavery risk, given the robust workplace relations legislation in Australia which governs the way we operate.

At CPS, the majority of construction work is subcontracted which does increase our modern slavery risks by obscuring the party responsible, especially if there are numerous layers of subcontracting. CPS is working to improve the visibility the organisation has over the suppliers' subcontractors, agents, distributors, or third parties.

In relation to the two offshore companies in India and Macedonia that CPS utilises for niche design services, CPS recognises the geographical risks associated with these companies. According to the Walk Free Global Slavery Index, '*as the second most populous country in the world, India has the highest estimated total number of people living in modern slavery globally, and the sixth highest prevalence in the Asia Pacific region*'<sup>5</sup>. CPS works with these organisations under framework agreements that address modern slavery. An audit of their practices is planned in the forthcoming year to support our ongoing commitment.

### **Goods and Materials acquired offshore:**

CPS acknowledges that our supply chain includes the procurement of goods and materials from large and offshore manufacturing plants that have a higher risk of modern slavery. This is based on the geographic locations and industry sectors in which these suppliers operate. The main risk is the reduced visibility CPS has over these offshore suppliers. For example, suppliers may rely on vulnerable workers, underpay their staff, engage in forced work or have hazardous work environments. This is more likely to occur in countries with a higher modern slavery risk.

Whilst CPS engages with local Australian entities, it should be acknowledged that some of these organisations manufacture and import goods and materials from China. We recognise that this presents a significant risk of modern slavery. According to the Walk Free Global Slavery Index, in 2021 5.8 million people were living in modern slavery in China. Despite efforts from China to tackle modern slavery, its overall response has been significantly undermined by state-imposed forced labour<sup>6</sup>. Accordingly, CPS ensures that all of these organisations are governed by suitable framework agreements—including provisions related to modern slavery—are

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<sup>5</sup> Walk Free Global Slavery Index, 2025. *Modern Slavery in India*. Available from <https://www.walkfree.org/global-slavery-index/country-studies/india/>.

<sup>6</sup> Walk Free Global Slavery Index, 2025. *Modern Slavery in China*. Available from <https://www.walkfree.org/global-slavery-index/country-studies/china/>.

responsive to modern slavery due diligence questionnaires and they are required to adhere to the CPS Supplier Code of Conduct.

In some circumstances, customers of CPS will dictate which offshore manufacturer they would like the materials acquired from. This does limit CPS' ability to conduct due diligence and choose the best manufacturer based on modern slavery factors. However, these clients are normally large companies who impose their own modern slavery procedures for their supply chains which does reduce the risk of modern slavery occurring in connection with these manufacturers.

## **8. ADDRESSING AND MANAGING OUR MODERN SLAVERY RISKS IN 2025**

In alignment with our commitments outlined in the 2024 Modern Slavery Statement, CPS has successfully implemented a comprehensive suite of actions throughout this reporting period.

### **1. Policies, Processes and Procedures:**

CPS has developed numerous policies, processes and procedures for assessing and addressing modern slavery risks, some of which were discussed in our previous Modern Slavery Statement. Since our previous Modern Slavery Statement, CPS has prioritised the development of these policies to establish a stronger ethical framework across its operations and supply chain. CPS has also published several of these policies on the company website to promote transparency, leadership in ethical sourcing and assistance to other organisations seeking to strengthen their own modern slavery frameworks.

Modern Slavery Policy	We introduced a formal policy that sets out explicit expectations for employees, suppliers, and contractors. It mandates compliance with relevant legislation and includes provisions for contract termination in cases of non-compliance.
Employee Manual	Our Employee Manual includes work, health and safety and environmental management policies.
Workplace Anti-Bullying & Anti-Harassment Policy	Our Workplace Anti-Bullying and Anti-Harassment Policy applies to all employees, directors, consultants, contractors and volunteers. All CPS employees are required to read and acknowledge this policy. Employees are then notified of any new policies that are introduced and are required to acknowledge these policies as they are rolled out.
Employee Code of Conduct	Our Employee Code of Conduct applies to all employees, directors, agents and consultants of CPS. In having this Code, we ensure that our people comply with our policies and procedures, in addition to relevant laws and regulations.
Recruitment and onboarding	CPS employees are required to read and acknowledge various policies (including those listed in this Modern Slavery Statement) at the time of being onboarded through our HR platform.
Health and Safety	At CPS, we prioritise the health and safety of our personnel. Our Workplace Health and Safety Policy reflects our commitment to ensuring a safe environment and operations for all employees and subcontractors of

	CPS. CPS has obtained certification in ISO 45001:2018 Occupational Health & Safety and is also accredited with the Office of the Federal Safety Commissioner. These accreditations are regularly reviewed by their respective governing bodies and audits are undertaken to enable periodic recertification.
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## 2. Awareness and Training

As discussed in our last Modern Slavery Statement, CPS has invested in the following education programs and engagement across all levels of the organisation to embed a culture of vigilance and ethical responsibility:

Mandatory Online Training	All employees were required to complete foundational training on modern slavery risks. At the time of reporting, 99% of staff had successfully completed the program.
Targeted Learning Sessions	We hosted “lunch and learn” events focused on specific risk areas, including: <ul style="list-style-type: none"> <li>• The use of labour hire companies;</li> <li>• Importation of equipment, products, and services from overseas; and</li> <li>• Supplier governance and ethical sourcing.</li> </ul>
Leadership Engagement	Senior leaders participated in a specialised training program and formally endorsed the Modern Slavery Statement, reinforcing ethical leadership from the top down.
Ongoing Communication	Company-wide “all hands” briefings and accessible policy documentation ensured that modern slavery awareness remained a visible and integrated part of our internal communications.

## 3. Due Diligence and Remediation

CPS strengthened its supplier oversight mechanisms with the following policies, processes and procedures:

Supplier Screening Protocols	CPS introduced rigorous checks and contractual clauses requiring suppliers to conduct their own due diligence and report any breaches related to modern slavery within their business and supply chain.
Supplier Management Platform	CPS commenced the rollout of a new platform to onboard, assess and categorise suppliers. This initiative is designed to enhance data analytics, improve supplier oversight, and support continuous improvement in ethical sourcing.
IT-Led Onboarding Process	All new suppliers are required to: <ul style="list-style-type: none"> <li>• Acknowledge and agree to the CPS Supplier Code of Conduct; and</li> <li>• Respond to targeted questions regarding their modern slavery policies, legislative obligations, and sustainability practices, including providing their own Modern Slavery Policy and Modern Slavery Statement (where relevant).</li> </ul>

Onboarding Criteria	<p>As part of our automated Supplier Onboarding process, potential suppliers must confirm they have read and will adhere to our Supplier Code of Conduct. Any potential suppliers who indicated they were not willing to comply with the Supplier Code of Conduct, were not progressed any further.</p> <p>Supplier responses are reviewed on a case-by-case basis, with flexibility afforded to smaller suppliers who may not yet have formal policies in place.</p>
Whistleblower Policy	<p>CPS strives to operate with a culture of ethical and appropriate corporate behaviour in all our business activities. This includes acting with integrity, honesty and in accordance with good corporate governance principles. Our Whistleblower Policy is designed to give guidance so that honesty and integrity are always maintained at CPS, this includes by providing individuals confidential means via which actual and suspected misconduct may be reported.</p>
Supplier Code of Conduct	<p>Supplier Code of Conduct explicitly requires our suppliers to ensure:</p> <ul style="list-style-type: none"> <li>• employment is freely chosen, and no form of forced labour, (including debt bonded), or indentured labour, human trafficking, and slavery shall be used, and that there should be no unreasonable restriction on workers freedom of movement, including entering or exiting any company facilities;</li> <li>• compensation paid to all workers complies with all applicable wage laws, including minimum wages, overtime hours and legally mandated benefits;</li> <li>• the rights of workers to exercise a lawful right of free association are respected, including joining or not joining any association of their choice, including the right to bargain collectively;</li> <li>• they exercise due diligence to identify modern slavery risks within their supply chain, and take all necessary action to mitigate these risks; and</li> <li>• they comply with all Australian laws and respect the fundamentals of the International Labour Organisation regarding the minimum hiring age of workers and that no child labour will be used at any level in the supply chain.</li> </ul> <p>All suppliers are notified of their requirement to comply with the Supplier Code of Conduct at the time of onboarding. The Supplier Code of Conduct also directs our suppliers to raise concerns in accordance with the Whistleblower Policy where applicable.</p>

Grievance Handling Policy	<p>At CPS we aim to foster good relationships amongst employees and between employees and management. We acknowledge that problems can arise at work that may sometimes cause employees to feel aggrieved.</p> <p>Our Grievance Handling Policy outlines the procedures employees and management should follow to try to resolve a grievance and outlines the steps CPS will take to resolve a grievance.</p>
Contractual arrangements	<p>CPS includes a standard clause in our three key supplier contracts requiring our contractors to:</p> <ul style="list-style-type: none"> <li>• ensure that they comply with all applicable laws, regulations and standards in relation to modern slavery;</li> <li>• effect their own policies and procedures to ensure compliance with these laws and take reasonable steps to ensure there is no modern slavery in their operations or supply chains including through the implementation of due diligence procedures; and</li> <li>• warrant that they have not been convicted of any modern slavery offences and have not been the subject of any investigation or enforcement proceedings in connection with modern slavery and requires contractors to give notice to CPS if they becomes aware of an actual or suspected breach of modern slavery laws.</li> </ul>
Continuous monitoring	<p>Through our ongoing monitoring of modern slavery risks, CPS will continue to publicly communicate our actions taken to address these risks by publishing a Modern Slavery Statement annually (as required by the Act).</p>
Governance and training	<p>At CPS, we recognise that promoting ethical and responsible behaviour starts at the top. We foster a culture of compliance, continuous improvement, integrity and honesty, which is reflected in the way we conduct our business.</p> <p>CPS is committed to training employees on our policies upon commencing employment to inform them of their rights and the standards and behaviour that is expected of them.</p>

## **9. EFFECTIVENESS OF ACTIONS TAKEN**

CPS understands the importance of ongoing evaluation and continuous improvement in relation to modern slavery risks. CPS seeks to promote transparency between employees, suppliers, and other stakeholders to mitigate the risk of modern slavery occurring in its operations or supply chain.

As discussed in our previous Modern Slavery Statement, we assess our performance in relation to modern slavery in the following ways:

1. tracking the outcome of our actions against our three focus areas: Policies Processes and Procedures, Awareness and Training and Due Diligence and Remediation;
2. regularly engaging with our stakeholders to understand the impact of our operations and strengthen our overall approach to modern slavery;
3. consulting with external experts and advisors on our modern slavery processes, policies, and procedures to address gaps and to ensure best practice; and
4. continue monitoring for any reported or suspected incidents of modern slavery within our organisation and supply chain.

In our review of our above actions taken, we have identified the following for the reporting period:

### **1. Evaluation of our three focus areas:**

- I. Policies, Processes and Procedures;
  - Public visibility of our policies has helped reinforce our ethical stance and encouraged dialogue with stakeholders;
  - The inclusion of termination clauses in our contracts with suppliers has strengthened accountability for modern slavery risks across our supply chain; and
  - Benchmarking against industry standards has positioned CPS as a proactive leader in modern slavery risk management.
- II. Awareness and Training:
  - High rates of completion for our training programs indicate strong employee engagement and foundational understanding;
  - Interactive sessions and leadership involvement have helped foster a culture of ethical responsibility within the organisation; and
  - Ongoing internal communications have ensured sustained awareness and integration of modern slavery principles into business practices.
- III. Due Diligence:
  - The supplier onboarding process has effectively filtered suppliers based on ethical compliance, with flexibility for smaller vendors;
  - The Supplier Management platform is enabling more granular insights into supplier risk profiles, however full implementation of this platform is ongoing; and
  - Case-by-case assessments ensure a balanced approach to supplier inclusion while maintaining ethical standards.

## **2. Engagement with stakeholders**

- I. CPS consulted key internal stakeholders, including senior management and the board of directors on the outcomes of our anti-modern slavery actions and broader corporate commitments.

## **3. External consultation**

- I. CPS has engaged with external advisors in relation to this Modern Slavery Statement.

## **4. Instances of Modern Slavery**

- I. To date, no instances of modern slavery have been identified in our supply chain or operations.

## **10. FUTURE ACTIONS**

CPS is committed to further developing and improving its processes and understanding of modern slavery risks in its operations and supply chains.

In the next reporting period, CPS intends to do the following:

### **1. Supplier training**

CPS will conduct targeted awareness forums for our suppliers, with a particular focus on small and medium-sized enterprises, to support their understanding of modern slavery risks and ensure alignment with our Supplier Code of Conduct. These forums will provide practical guidance, promote ethical sourcing practices, and create a space for open dialogue on risk mitigation strategies. By engaging directly with our supplier network, CPS aims to improve capability, foster transparency, and strengthen compliance across its supply chains.

### **2. Establish a Modern Slavery Committee**

To strengthen our commitment to ethical business practices and human rights, CPS will establish a **Modern Slavery Committee** responsible for overseeing our approach to identifying and mitigating modern slavery risks across our operations and supply chain. This Committee will meet quarterly or as otherwise needed, to review supplier governance, assess risk, and guide internal policy development. As part of our recognition of limited visibility over the subcontractors, agents, distributors, or any third parties that our suppliers engage, the Committee will consider this risk and potential solutions. The Committee will also develop a procedure for responding to any alleged modern slavery cases either within the operations or the supply chain of the organisation.

As part of this initiative, we will appoint a **Modern Slavery Champion** to lead awareness efforts and act as a central point of contact for training, engagement, and continuous improvement within the organisation. This role ensures that modern slavery considerations are embedded into procurement, onboarding, and compliance processes, while also fostering a culture of accountability and transparency.

### **3. Procurement Risk Register**

In FY27, CPS will undertake a comprehensive mapping of its categories of spend, classifying them into **High, Medium, and Low Risk** tiers based on exposure to modern slavery risks. These risk categories will be formally incorporated into our Enterprise Risk Register, ensuring visibility and accountability across the organisation. Categories identified as **High Risk** will be subject to periodic audits, enabling CPS to monitor compliance, engage suppliers on ethical practices, and take corrective action where necessary. This approach strengthens our governance framework and supports our commitment to continuous improvement in ethical sourcing and risk management.

### **4. Audit International Workplace practises**

CPS is committed to ensuring ethical and fair working conditions across all regions in which we operate. As part of this commitment, we will conduct audits of our overseas partners, specifically focusing on working practices for CPS employees based in the Philippines. These audits will assess compliance with our standards for labour rights, workplace safety, and fair treatment, and will form part of our broader strategy to uphold human rights and eliminate risks of modern slavery within our extended operations.

## **11. CONSULTATION**

In preparing this statement, CPS engaged external legal advisors to ensure our approach remains current and fully aligned with the latest legislative requirements relating to modern slavery. We also consulted key internal stakeholders, including senior management and our board of directors, to provide strategic oversight and ensure consistency with our broader corporate commitments.

## **12. STATEMENT APPROVAL**

This Modern Slavery Statement was approved by the board of directors of CPS Technology & Infrastructure Pty Ltd ACN 148 905 159 in their capacity as principal governing body on 15<sup>th</sup> December 2025 and is signed by Rhys Morgan in his capacity as Chief Executive Officer of CPS Technology & Infrastructure Pty Ltd.



**Rhys Morgan**

Chief Executive Officer

CPS Technology & Infrastructure Pty Ltd