Modern Slavery Statement 2026

Wisr Limited

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1. Introduction

This Modern Slavery Statement is a statement made in accordance with the Modern Slavery Act 2018 (Cth) and applies to:

- Wisr Limited (ASX: WZR) ABN 80 004 661 205.
- Wisr Limited's subsidiary Wisr Finance Pty Ltd ACN 119 503 221 which holds an Australian Credit Licence No. 458572 and an Australian Financial Service Licence No. 458572.
- And all other controlled subsidiaries of Wisr Limited.

For the financial year ending 30 June 2026, we collectively acknowledge our responsibility to prevent modern slavery and human trafficking within our operations and supply chains. We are committed to fostering ethical business practices and protecting human rights across all levels of our organisation.

2. About Wisr

Wisr is a leading Australian fintech and online non-bank lender, helping customers make smarter money decisions easy through simple, digital and customer-focused financial solutions.

Our vision is a world where people have the power to progress. This reflects our focus on making finance more accessible, practical and relevant to customers' needs, while supporting improved financial wellbeing and better customer outcomes

Our purpose is to power people's progress. We do this by giving Australians access to finance, insights and tools that support better financial decisions and help them move forward with confidence.

3. Our Values

At Wisr, our values are the foundation of our culture and guide our actions as we strive to power people's progress. They inspire us to challenge ourselves, support our colleagues, and always put our customers first. These principles not only drive our business forward but also ensure that we remain committed to ethical and responsible practices in all our endeavours:

- Courageously Ask, "What if?": Embrace constructive questioning and challenge the status quo to foster innovation and improvement.
- ❤ for the Customer: Put the customer at the centre of all decisions, ensuring their needs and experiences guide our actions.
- Smarter Parts Together: Foster collaboration across departments to leverage collective strengths and achieve business goals.
- Be a Stunning Colleague: Create a supportive and respectful work environment by sharing knowledge and taking accountability.
- Growth Over Comfort: Prioritise personal and professional growth by embracing challenges and learning opportunities, pushing beyond comfort zones with the right support to drive development.

4. Our Structure and Operations

4.1 Structure

Wisr Limited is an ASX-listed company (ASX: WZR) that operates through its various wholly-owned subsidiaries:

- Wisr Finance Pty Ltd holds an Australian Financial Services Licence (AFSL) and Australian Credit Licence (ACL). These licences enable the Group to carry out its core business activities in the financial sector.
- Wisr Services Pty Ltd provides rate estimates and other services as an agent for Wisr Finance Pty Ltd.

4.2 Operations

As an online non-bank lender in Australia, Wisr specialises in delivering innovative financial solutions through advanced technology and customer-centric service. Our operations focus on empowering people's progress by providing efficient and accessible financial products and financial services. Our core offerings include:

- **Personal Loans:** Providing flexible and competitive loan solutions tailored to meet the diverse needs of our customers, helping them achieve their financial goals.
- **Credit Scores:** Offering tools and services that empower individuals to understand and improve their credit scores, enhancing their financial literacy and creditworthiness.
- **Round Up:** A smart savings tool that rounds up everyday purchases to the nearest dollar, automatically investing the difference to help customers grow their savings effortlessly.
- **BreachAlert:** A proactive security solution that monitors for potential data breaches, alerting customers promptly to protect their personal information and maintain financial security.

As of 30 June 2026, Wisr employed over 100 staff. The majority of Wisr's employees work from the Sydney office, with additional team members located in Victoria, Queensland, and Western Australia.

In addition to our Australian workforce, Wisr also engages labour hire staff through an onshore labour company, employing over 30 staff members in Manila, Philippines. Under this arrangement, Wisr maintains a close relationship with this supplier to ensure oversight of employee remuneration, benefits, and engagement. This oversight is crucial in managing modern slavery risks by ensuring that all offshore labour practices comply with ethical standards and that workers are treated fairly and with respect.

5. Our Supply Chains

Our supply chain includes a diverse range of suppliers, from small businesses to large corporations. Our primary focus is to ensure that all suppliers adhere to modern slavery regulations relevant to their locations. We have verified that around 72% of our suppliers are committed to these regulations and have made statements to that effect.

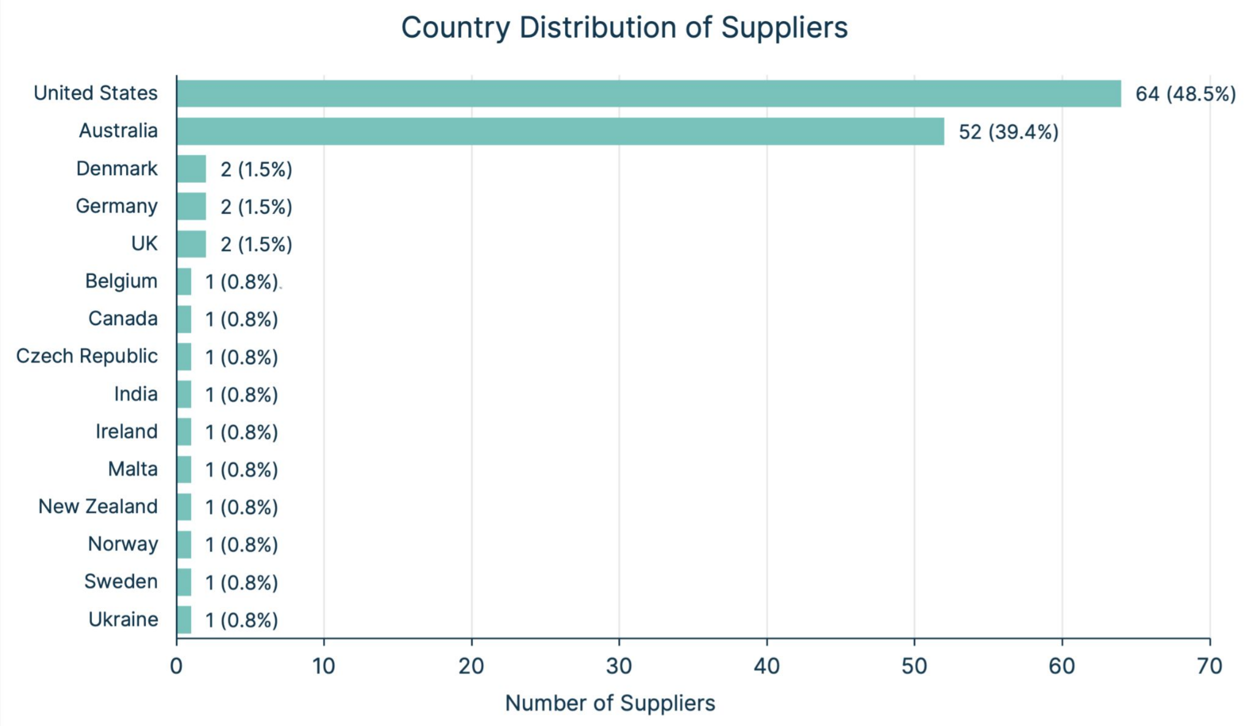
Overall, the risk of modern slavery within our supply chain is considered low. No high-risk incidents or issues for modern slavery with our suppliers have been identified for the reporting period. However, we continue to perform regular due diligence to minimise exposure to modern slavery risks. When thorough due diligence is not feasible for occasional purchases from overseas suppliers, we prioritise sourcing goods or services locally.

We consistently evaluate new and existing supplier relationships, taking corrective action when performance does not meet our standards, including potentially terminating the relationship. Before entering into new supplier agreements, we conduct a thorough risk assessment and request additional information if high risks related to modern slavery are identified.

Our company engages on a broad network of suppliers to support our operations, business processes, and technological infrastructure.

Wisr is dedicated to maintaining the highest levels of professional integrity and ethical conduct and expects our suppliers and third-party partners to uphold these same standards. We strive to collaborate closely with our supply chain partners and third parties to foster a responsible and sustainable business environment. We expect our suppliers and third parties to adhere to all applicable local and national laws and regulations.

In the financial year ending June 2026, Wisr engaged over 132 third-party suppliers to support various functions, including IT, Lending, Finance, HR, Product development, and Marketing. All our suppliers are based in regions identified as low-risk for modern slavery under the Global Slavery Index (GSI). In addition to our suppliers, we have partnerships with finance brokers to distribute our personal loan products.



6. Risks of Modern Slavery in Wisr

Through our comprehensive risk identification and management strategies, including supplier assessments, audits, and ongoing engagement, we have determined that the risk of modern slavery in our operations and supply chains is low.

At Wisr, we are committed to mitigating these risks by employing a multi-layered approach that incorporates industry best practices and a focus on continuous improvement.

- **Geographical Risk Analysis:** We assess the regions where our suppliers operate, with a particular focus on areas identified as higher risk by the Global Slavery Index. The majority of our suppliers are based in the USA and Australia locally, both of which are considered low-risk regions for modern slavery. This geographical distribution significantly reduces our overall exposure to modern slavery risks.
- **Sector Risk Assessment:** We evaluate the risk levels associated with the industries in which our suppliers operate. The majority of our suppliers are in the IT, Engineering, Large Corporations, and Government Agency sectors, all of which are generally considered low-risk for modern slavery. This sectoral focus further minimises our exposure to modern slavery risks, as these industries typically have more robust labour practices and regulatory oversight.
- **Supplier's Policy and Practice Evaluation:** We conduct a general review of our suppliers' policies and practices. As part of this review, suppliers are assessed against a range of factors, including whether they have published a modern slavery statement or relevant policy, and other indicators that demonstrate their approach to ethical business practices.

- **Onboarding Vendor Assessment:** During the vendor onboarding process, we assess potential suppliers to identify any material risks before engagement. This includes considering the nature of the goods or services provided, the supplier's operating locations, the type of work involved, and any other factors that may indicate a higher modern slavery risk. Where concerns are identified, further review may be required before the supplier is approved. In some cases, suppliers may be asked to provide additional information, address identified issues, or may not be onboarded.

- **Desktop Review:** We conducted desktop assessment of our current suppliers to evaluate their potential exposure to modern slavery risks. This assessment revealed that 72% of our suppliers already have modern slavery statements or policies in place, significantly reducing our overall modern slavery risk.

- **Ongoing Monitoring and Engagement:** We maintain active and continuous engagement with our suppliers, monitoring their compliance with our ethical standards and labour practices. This ongoing dialogue allows us to promptly address any emerging risks or non-compliance issues.

- **Supplier Audits:** We conduct regular audits of our suppliers to ensure compliance with our ethical standards and prevent modern slavery. These audits provide valuable insights into suppliers' operations, and any identified risks are addressed through corrective actions or reassessment of our relationship with the supplier.

7. Our Policies and Governance

At Wisr, we have a zero tolerance for modern slavery in all its forms. Our commitment to combating modern slavery is reinforced by a comprehensive framework of policies and governance structures that ensure we operate with integrity, uphold the highest ethical standards, and proactively address modern slavery risks within our operations and supply chains.

7.1 Policies

To effectively manage modern slavery risks, we have established several key policies that guide our operations and our interactions with suppliers:

- **Code of Conduct:** Our Code of Conduct sets the foundation for ethical behaviour across our organisation.

- **Risk Management Policy:** Our Risk Management Policy outlines the systematic approach we take to identify, assess, and mitigate risks, including those related to modern slavery.

- **Breach Reporting Policy:** This policy provides a clear framework for reporting, investigating, and resolving incidents and issues and reporting of any breaches.

- **AML/CTF Program:** Our Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Policy ensures that we maintain robust controls to prevent illegal activities that could be linked to modern slavery.

- **Work Health & Safety Policy:** Our commitment to the safety and well-being of all employees and contractors is outlined in our Work Health & Safety Policy.

- **Grievance Policy:** Our Grievance Policy provides a formal mechanism for employees to raise concerns.

- **Speak Up Program:** Our Speak Up Program encourages employees to report unethical behaviour or concerns.
- **Third Party Risk Management Policy:** Our 3rd party risk management policy provides a framework for assessing and managing supplier risks, including modern slavery risk considerations as part of vendor due diligence.
- **Whistleblower Policy:** Our Whistleblower Policy provides a confidential reporting channel for employees and other eligible persons to raise concerns about misconduct and unethical conduct.

7.2 Governance

We believe that a robust corporate governance framework is crucial for effectively managing modern slavery risks within our operations and supply chain.

- **Board Oversight:** Our Board of Directors, supported by relevant committees, oversees the implementation of our modern slavery risk management strategy. The Board regularly reviews the effectiveness of our policies and processes, ensuring they align with our ethical commitments.
- **Compliance and Risk Management Committees:** These committees are responsible for monitoring compliance with our policies, conducting risk assessments, and addressing any identified risks related to modern slavery. They report directly to the Board, ensuring that any concerns are promptly escalated and addressed.

For more detailed information on our approach to corporate governance, please visit our corporate website.

8. Assessing Effectiveness

In the financial year ending June 2026, Wisr undertook a comprehensive evaluation of its Modern Slavery Framework to understand and manage modern slavery risks more effectively across its operations and supply chains.

The effectiveness of customer due diligence and AML/CTF processes was evaluated, with these processes consistently applied to both new and existing customers.

Following a detailed desktop assessment of our suppliers, there are three key mitigations that significantly enhance our effective control over modern slavery risk. First, we strategically select suppliers from countries classified as lower risk under the Global Slavery Index, ensuring our supply chain operates in regions with robust safeguards against modern slavery. Second, nearly 72% of our suppliers have implemented modern slavery statements or policies, underscoring their active role in mitigating this risk. Lastly, our focus on partnering with suppliers in low-risk industries further reduces the likelihood of exposure to unethical practices. Together, these measures demonstrate our strong commitment to maintaining effective risk control over modern slavery within our supply chain.

Modern slavery training was delivered to people leaders during the reporting period. This supports the effectiveness of our controls by improving awareness of modern slavery risks and helping leaders identify and escalate potential issues where required.

Wisr's approach to modern slavery is continually evaluated to ensure effectiveness. Metrics such as supplier compliance, audit outcomes, and training completion rates are regularly monitored to assess the success of the initiatives.

9. Looking Ahead

In the coming year, we will prioritise the following key areas to strengthen our approach to preventing modern slavery:

- Regularly update our risk management, recruitment, and remuneration policies to strengthen our ability to identify and address modern slavery risks. These updates ensure our policies remain effective, incorporating the latest strategies for combating modern slavery.
- Enhance due diligence in vendors by consistently applying our supplier monitoring processes and implementing modern slavery provisions in contracts and onboarding procedures for major suppliers.
- Expand training initiatives by rolling out Modern Slavery Training modules to all Wisr staff.
- Implement new modern slavery clauses in our template agreements and track the usage of updated templates across the organisation.
- Develop a Third Party Supplier Code of Conduct to set clear expectations for supplier behaviour, including ethical conduct, responsible business practices and modern slavery risk management.
- Strengthen collaboration with industry peers, participate in industry forums and collaborative initiatives to share best practices, learn from peers, and contribute to collective efforts against modern slavery.

10. Consultation and Commitment of the Board

This Modern Slavery Statement was prepared by Wisr Limited on behalf of itself and its wholly owned subsidiaries. In developing this statement, Wisr consulted with relevant entities that we own or control. We are committed to ongoing monitoring and will regularly report on the effectiveness of this Modern Slavery Statement to the Board of Directors.

This statement was approved by the Board of Wisr Limited on 27 July 2026 and signed by Matt Brown in his role as Chairman of Wisr Limited.

Matt Brown

Chairman

Wisr Limited