

Document Name	BREXA ANZ – MODERN SLAVERY STATEMENT 2025
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1. INTRODUCTION

This Modern Slavery Statement is made by BREXA ANZ for the reporting period 1 January 2025 to 31 December 2025 under the Modern Slavery Act 2018 (Cth).

This statement outlines the steps BREXA ANZ has taken during the reporting period to identify, assess and address modern slavery risks in its operations and supply chains, and how those actions are governed through the BREXA ANZ Modern Slavery Policy and Modern Slavery Reporting Framework.

BREXA ANZ recognises that modern slavery can take many forms, including human trafficking, slavery, servitude, forced labour, debt bondage, child labour, forced marriage and deceptive recruiting for labour or services.

BREXA ANZ is committed to operating responsibly, treating workers with dignity and respect, and applying a risk-based approach to preventing, mitigating and remediating modern slavery risks across our operations and supply chains.

2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Outsourcing Oceania Holdings Pty Ltd (ABN 20 628 356 141) was an Australian entity which was registered in August 2018. The name changed to BREXA Pty Ltd during 2025 and is now fully owned by BREXA International Limited (UK). BREXA International is part of BREXA Holdings Inc, formerly known as Outsourcing Inc, a global staffing and recruitment group with headquarters in Japan.

BREXA Holdings Inc acts as a holding company for BREXA International Limited, since 2025 all of BREXA Holdings entities have been fully-owned and controlled by Brexa International Limited.

BREXA Pty Ltd (ABN 20 628 356 141) is the principal reporting entity. This statement is a joint statement covering all BREXA ANZ entities that are owned or controlled by BREXA Pty Ltd and included for the 2025 reporting period.

BREXA ANZ operates across Australia, New Zealand and Singapore providing recruitment, labour-hire, consulting and training services through a number of operating entities. The Group also includes shared services functions that support governance, finance, payroll, technology and risk management activities.

Collectively, the BREXA ANZ Group conducts business from approximately 32 locations across Australia, New Zealand and Singapore, has annual revenue in the region of \$700 million and employs approximately 400 staff.

The entities covered by this statement are listed at **Annexure A**.

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Across the Group, BREXA ANZ employs a significant workforce and also engages a large number of on-hire workers placed with clients. Our operations are conducted primarily in Australia and New Zealand, with limited offshore exposure through certain suppliers and service providers.

This primarily involves the following types of operations (as described by the Act):

- a. Direct employment of workers; whether as permanent employees or on a casual or contract basis; and,
- b. Provision and delivery of services to other businesses.

Supply Chains is defined as the products and services (including labour) that contribute to the BREXA ANZ group. This includes products and services sourced in Australia, New Zealand or overseas and extends beyond direct suppliers.

For the purposes of this statement, our key operating elements of the BREXA ANZ Group, their operations and their associated supply chains are as follows:

ENTITY	MAIN OPERATIONS	TYPICAL SUPPLY CHAIN CATEGORIES
Albacore Consulting Group Pty Ltd (ABN: 67 644 577 471)	Technology, data, transformation, GRC and project consulting services.	Office services and professional services.
Bluefin Resources Group Pty Limited (ABN: 93 140 092 011)	Specialist permanent, contract, fixed-term and executive recruitment services across technology, data, transformation, risk, corporate services and related professional sectors.	Office services, facilities services, technology and professional services.
Bluefin Resources Pty. Limited (ABN: 48 106 436 837)		
BREXA Finance Shared Services Pty Ltd (ABN: 25 006 776 343)	Shared services across finance, payroll and corporate support.	Professional services, technology and other corporate support services.
BREXA Pty Limited (ABN: 20 628 356 141)	Group strategy, governance and risk oversight.	Professional services and other corporate support services.
Clicks Recruit (Australia) Pty Ltd (ABN: 87 078 625 242)	Specialist IT, technology and digital recruitment, contracting, payrolling	Office services, professional services and facilities services.

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	and related workforce services.	
HOBAN Recruitment Pty Ltd (ABN: 88 052 201 313)	Temporary, permanent, volume, industrial, commercial, government and managed workforce recruitment services.	Office services, professional services, facilities services and personal protective equipment.
Horizon One Recruitment Pty Ltd (ABN: 98 129 885838)	Specialist recruitment, labour-hire, executive search and people/talent solutions, with a focus on government and professional sectors.	Office services and professional services.
INDEX Consultants Pty Ltd (ABN: 33 123 720 043)	Technology advisory, consulting, project delivery and specialist technology talent services.	Office services and professional services.
Jigsaw Search Pty Ltd (ABN: 92 122 998 743)	Specialist recruitment and talent management services across procurement, supply chain, manufacturing and operations.	Office services, facilities services, technology and professional services.
Kinetic Employment Limited	Temporary, permanent, contract and fixed-term recruitment services across New Zealand, including corporate, medical, IT, blue-collar, trades and industrial sectors.	Office services, facilities services, technology and professional services.
Marble Group Pty Ltd (ABN: 93 119 778 193)	Recruitment services across construction, infrastructure, mining, property and specialist trades.	Office services, facilities services, technology, professional services and personal protective equipment.
Marble Group Services Pty Ltd (ABN: 66 631 301 016)		

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Project Management Partners Pty Ltd (ABN: 13 084 197 795)	Project management, consulting, training and advisory services.	Office services, facilities services, technology and professional services.
Rap2 Pty Ltd (ABN: 25 630 066 483)	Recruitment, labour-hire and workforce services across trades, industrial, construction, mining and professional sectors.	Office services, facilities services, technology, professional services and personal protective equipment.
Red Appointments Group Holdings Pty Ltd (ABN: 88 637 107 281)	Recruitment, labour-hire and workforce services across trades, industrial, construction, mining and professional sectors.	Office services, facilities services, technology, professional services and personal protective equipment.
Red Appointments Pty Ltd (ABN: 35 138 057 511)	Recruitment, labour-hire and workforce services across trades, industrial, construction, mining and professional sectors.	Office services, facilities services, technology, professional services and personal protective equipment.
Red Appointments NT Pty Ltd (ABN: 83 153 591 587)	Recruitment, labour-hire and workforce services across trades, industrial, construction, mining and professional sectors in the Northern Territory.	Office services, facilities services, technology, professional services and personal protective equipment.

3. OUR APPROACH TO MANAGING MODERN SLAVERY RISKS

BREXA ANZ has adopted a zero-tolerance approach to modern slavery in its own operations and applies a structured, risk-based approach to identifying, assessing and addressing modern slavery risks within its supply chains.

This approach is set out in the BREXA ANZ Modern Slavery Policy and the BREXA ANZ Modern Slavery Reporting Framework, which together establish the standards, governance responsibilities, supplier expectations, due diligence processes, remediation approach and reporting requirements applied across the Group.

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Oversight of this framework sits with the principal governing body, while each Group entity Chief Executive Officer (or equivalent) is responsible for implementation within their entity. Relevant business functions support supplier risk screening, due diligence, recordkeeping and escalation, and People & Culture maintains the policy framework and coordinates group-level reporting.

4. OUR POLICIES AND PROCESSES

During the reporting period, BREXA ANZ's modern slavery risk management approach was governed primarily by its Modern Slavery Policy and Modern Slavery Reporting Framework. These documents are supported by other group policies and processes, including whistleblower and broader governance arrangements, which help promote ethical and legally compliant conduct.

The Modern Slavery Policy sets BREXA ANZ's commitments, including freely chosen employment, dignity and respect for workers, supplier expectations, confidential grievance channels, a victim-centred approach to remediation, targeted training, recordkeeping and annual reporting. The Reporting Framework translates those commitments into mandatory operational processes across the Group.

Key elements of the Reporting Framework include:

- nomination of a contact person within each covered entity to coordinate implementation, consultation and annual reporting inputs;
- initial and ongoing supplier risk assessment using a high-risk supplier methodology based on geography, industry, product or service type and workforce characteristics;
- enhanced due diligence for high-risk suppliers, including use of the Supplier Modern Slavery Questionnaire and assessment of responses;
- maintenance of a High-Risk Supplier Register to record due diligence outcomes, supplier classifications, remediation actions and escalation decisions.

These controls are reviewed and refined as implementation matures to support consistent, group-wide identification, assessment, management and reporting of modern slavery risks.

5. POTENTIAL RISKS IDENTIFIED IN OUR SUPPLY CHAIN

Based on the nature of our operations and supply chains, BREXA ANZ considers its overall exposure to modern slavery risk to be low to moderate. The risk profile is influenced by our labour-intensive operating model, the engagement of on-hire workers, and the procurement of certain goods and services that may involve higher-risk sectors or jurisdictions.

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Potential areas of elevated risk include labour-related services and subcontracting arrangements, cleaning and other labour-intensive services, personal protective equipment and uniforms, information technology hardware and other manufactured goods that may be sourced from higher-risk jurisdictions, and any offshore suppliers or service providers where applicable.

These risks may arise through both direct supplier relationships and through the upstream inputs and labour practices of suppliers operating in higher-risk categories. BREXA ANZ's framework is intended to identify those higher-risk suppliers and apply enhanced due diligence and monitoring where needed.

6. ACTIONS TAKEN TO ADDRESS POTENTIAL RISKS AND EFFECTIVENESS OF THESE ACTIONS

During the reporting period, BREXA ANZ continued implementation of its Policy and Reporting Framework across the Group. Actions taken to assess and address modern slavery risks included:

- supplier risk screening across relevant categories to identify higher-risk suppliers and supplies;
- use of a Supplier Modern Slavery Questionnaire and related due diligence processes for identified high-risk suppliers;
- recording supplier due diligence outcomes, classifications and follow-up actions in High-Risk Supplier Registers;
- engagement with suppliers where gaps or risks were identified, with a preference to work with suppliers on remediation or risk mitigation where appropriate; and
- maintenance of escalation pathways so that decisions to continue with higher-risk or non-compliant suppliers are formally approved, documented and supported by mitigation measures.

BREXA ANZ assesses the effectiveness of these actions through a combination of qualitative and quantitative indicators, including the extent of supplier risk screening, the number of high-risk suppliers subject to enhanced due diligence, the issues identified and remediation actions taken, completion of relevant training, incidents or complaints raised, and the level of supplier engagement on improvement actions.

As the refreshed framework has continued to mature during the reporting period, BREXA ANZ expects these measures to become more robust over time as data quality, consistency of implementation and supplier engagement continue to improve.

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7. CONSULTATION

Consultation was coordinated centrally and involved engagement with relevant representatives of the BREXA ANZ entities covered by this statement. Each entity was asked to confirm information relating to its operations, supply chains, modern slavery risk areas, actions taken, remediation activity, effectiveness indicators and any relevant incidents or concerns. Draft content was reviewed for accuracy before the statement was finalised for approval.

8. OTHER RELEVANT INFORMATION

BREXA ANZ maintains confidential whistleblower and grievance mechanisms that enable workers and third parties to raise concerns, including concerns relating to modern slavery or worker exploitation. No material modern slavery incidents were identified during the reporting period.

9. FUTURE ACTIVITIES

During the reporting period, BREXA ANZ focused on embedding a more consistent and structured approach to modern slavery risk management across the Group.

- a. embedding the Modern Slavery Policy and Reporting Framework across covered entities;
- b. strengthening supplier risk assessment and high-risk supplier identification processes; and
- c. improving the consistency of due diligence records, supplier engagement and reporting inputs across entities.

Looking ahead, BREXA ANZ will continue to refine and enhance its approach by:

- a. continuing implementation and embedding of the Reporting Framework across the Group;
- b. refining supplier risk assessment, due diligence and remediation processes for higher-risk suppliers;
- c. strengthening supplier engagement and contractual expectations over time; and
- d. improving the quality and consistency of data used to support annual reporting and effectiveness assessment.

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10. APPROVAL

This Modern Slavery Statement was approved by the principal governing body of Brexa Pty Ltd, as the principal reporting entity, on behalf of the BREXA ANZ entities covered by this statement. It is signed by a responsible member of Brexa Pty Ltd in accordance with the Modern Slavery Act 2018 (Cth).

Approved on behalf of BREXA ANZ for the reporting period 1 January 2025 to 31 December 2025.



Signature of Chief Executive Officer

DATED: 14 July 2026

Revision History		COMMENTS FROM REVIEW
1.0	19 June 2026	Initial version for approval.
1.1	25 June 2026	Formatting changes to align with corporate auditing compatibility.
1.2	13 July 2026	Updated to reflect full list of entities included under BREXA ANZ for the reporting period

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ANNEXURE A – LIST OF ENTITIES COVERED BY THIS STATEMENT

Brexia Pty Ltd (ABN 20 628 356 141) and the controlled entities included for the reporting period are listed below:

- Albacore Consulting Group Pty Ltd (ABN: 67 644 577 471)
- Bluefin Resources Group Pty Limited (ABN: 93 140 092 011)
- Bluefin Resources Pty. Limited (ABN: 48 106 436 837)
- BREXA Finance Shared Services Pty Ltd (ABN: 25 006 776 343)
- BREXA Pty Limited (ABN: 20 628 356 141)
- Clicks Recruit (Australia) Pty Ltd (ABN: 87 078 625 242)
- HOBAN Recruitment Pty Ltd (ABN: 88 052 201 313)
- Horizon One Recruitment Pty Ltd (ABN: 98 129 885838)
- INDEX Consultants Pty Ltd (ABN: 33 123 720 043)
- Jigsaw Search Pty Ltd (ABN: 92 122 998 743)
- Kinetic Employment Limited (NZBN: 94 290 302 507 65)
- Marble Group Pty Ltd (ABN: 93 119 778 193)
- Marble Group Services Pty Ltd (ABN: 66 631 301 016)
- Project Management Partners Pty Ltd (ABN: 13 084 197 795)
- Rap2 Pty Ltd (ABN: 25 630 066 483)
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ANNEXURE B – MODERN SLAVERY ACT REPORTING CRITERIA INDEX

For ease of reference, the table below identifies where the mandatory reporting criteria under the Modern Slavery Act 2018 (Cth) are addressed in this statement.

SERIAL	MODERN SLAVERY ACT CRITERIA	SECTION OF STATEMENT
1	Identify the reporting entity	Section 2 and Annexure A.
2	Describe the reporting entity's structure, operations and supply chains	Section 2.
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or control	Section 5.
4	Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Section 6.
5	Describe how the reporting entity assesses the effectiveness of these actions	Section 6.
6	Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Section 7.
7	Provide any other relevant information and future activity	Section 8 and Section 9

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