

Modern Slavery Statement

Reporting period ending 30 June 2025

Fox HoldCo Limited is pleased to release this Modern Slavery Statement under the *Modern Slavery Act 2018 (Cth)*.

Modern slavery occurs in almost every country in the world, and cuts across ethnic, cultural and religious lines. The United Nations estimates there are more than 50 million victims of modern slavery worldwide, and women and children remain disproportionately vulnerable.

In line with our stated commitment to support human rights, we will never employ or use any form of child labour which deprives children or adolescents of their childhood, their potential and their dignity, or that is harmful to physical and mental development. In addition, we will never employ or use any form of forced labour including slave, bonded, and indentured labour or any form of human trafficking.

We are committed to assessing the actual and potential risks of human rights violations of this nature in our supply chain, and to taking reasonable and proportionate action to prevent or minimize these risks, detect actual violations and provide or facilitate access to remedies for those affected.

This annual Modern Slavery Statement (**Statement**) describes our approach to meeting these commitments and updates our ongoing efforts to assess and address the risk of modern slavery in our own business operations and our supply chain.

We look forward to continuing to develop and refine our approach to this important human rights initiative in the years to come.

This Statement was approved by the Board of Directors of Fox HoldCo Limited (**Fox HoldCo**), on 27 November 2025, and is made pursuant to the *Modern Slavery Act 2018 (Cth)* (**Act**).

1. Reporting entity and structure

Fox HoldCo is the ultimate parent company of QANTM Intellectual Property Pty Ltd (**QANTM**) and its related companies (together with QANTM, the **Group**) and is issued in respect of the financial year ended 30 June 2025 (**Reporting Period**). QANTM was previously the reporting entity for the Group, however the Group was acquired by Fox HoldCo in August 2024, and Fox HoldCo is now the reporting entity for the Group.

QANTM is the owner of a group of leading intellectual property (**IP**) services businesses operating under the following key brands during the Reporting Period:

Davies Collison Cave, including:

- Davies Collison Cave Pty Ltd - an incorporated patent and trade marks attorney business operating in Australia and New Zealand;
- Davies Collison Cave Law Pty Ltd - an incorporated legal practice operating in Australia;
- DCC Ventures Pty Ltd - a technology commercialisation advisory and consulting service operating in Australia¹;
- Davies Collison Cave Asia Pte Ltd - an incorporated patent and trade marks attorney business operating in Singapore;
- DCC Hong Kong Ltd – an incorporated patent and trade marks attorney business operating in Hong Kong; and
- DCC Advanz Malaysia Sdn Bhd – a specialist IP advisory company operating in Malaysia.

¹ This entity ceased trading shortly after the end of the Reporting Period.

FPA Patent Attorneys, including:

- FPA Patent Attorneys Pty Ltd - an incorporated patent attorney business operating in Australia and New Zealand; and
- FPA Patent Attorneys Asia Pte Ltd - an incorporated patent attorney business operating in Singapore.

Sortify.tm Ltd – a New Zealand-headquartered trade mark legal technology company that provides technology solutions incorporating artificial intelligence and automation to assist with the filing of trade marks and management of trade mark portfolios. Sortify.tm Ltd and its subsidiary Trademark Planet Ltd operate automated trade mark filing platforms (primarily under the Trademarks Online brand) in Australia, New Zealand, Malaysia, Singapore, Hong Kong, the United Kingdom and Benelux (**Sortify.tm**).

QANTM Valuations – an Australian headquartered company that provides valuation services in respect of IP and other intangible assets, servicing clients in each of Australia, New Zealand and Singapore (**QANTM Valuations**).

In addition to these operating businesses, the Group includes two additional wholly-owned subsidiaries incorporated and operating in Australia, with employees providing “back office” and other services to support the operating businesses and the corporate head office.

All of the companies referenced above in this section are members of the Group for the purposes of this Statement. For completeness and compliance with the Act, where our structure, operations and supply chain have remained the same since the last reporting period, we have re-stated the same information in this Statement.

2. Operations

The Group generates revenue by providing services in relation to the creation, protection, enforcement and management of IP. In addition, the Group generates revenue outside of the IP application and protection process, with clients engaging the Group’s businesses to provide strategic IP advice regarding their IP portfolio or that of their competitors, which now includes valuation services provided by QANTM Valuations. Such strategic advice assists clients in identifying potential opportunities for IP protection. DCC Law provides IP legal and litigation services, and corporate and commercial legal advice on mergers and acquisitions, governance and compliance, business structures and restructuring, capital raising, joint ventures, finance and asset protection. Sortify.tm provides AI-powered technology solutions, including online trade mark registration platforms in Australia, New Zealand, Singapore, Malaysia, Hong Kong, the UK and Benelux.

The Group’s operating businesses have a diverse client base, ranging from start-up ventures and SMEs to Fortune 500 multinationals, public sector research institutions and universities. The majority of the Group’s clients are located in Australia, the United States of America, Europe, Singapore, Malaysia and Japan, and can be broadly divided into three groups:

- local clients, which include Australia, New Zealand, Singapore and Malaysia based corporates, public sector research institutions, universities, and private individuals; and
- international clients, which include:
 - foreign corporates who engage directly with individual Group businesses, including Fortune 500 companies and other foreign multinational corporations; and
 - international clients referred to QANTM by IP practices based overseas (**Foreign Associates**).

Over the Reporting Period the Group had approximately 411 employees, with 84% of them based in Australia.

3. Supply Chain

The Group's businesses have relationships with a broad range of IP services businesses located outside Australia, New Zealand, Singapore and Malaysia (**Overseas Associates**). Group businesses engage with these Overseas Associates in two main ways:

- Overseas Associates engage Group businesses to act on behalf of their own clients, where those clients seek to obtain IP protection in Australia, New Zealand, Singapore, Hong Kong or Malaysia, or other countries in the region where the Group businesses facilitate registration of IP rights (often as part of the "national phase entry" of applications made pursuant to the international Patent Cooperation Treaty).
- The Group's businesses often engage an Overseas Associate to pursue IP protection or provide advice as a subcontractor to the individual business, where the business has been instructed by a client to source advice or assistance with respect to IP protection in the Overseas Associate's jurisdiction.

Overseas Associates are therefore both clients, and a key part of the Group's supply chain, acting as sub-contractors providing professional services to the Group's operating businesses, to support services provided by those operating businesses to their clients.

Our supply chain also includes the ordinary suppliers of products and services that would typically be required by any professional services company (**Ordinary Suppliers**). These services include office space and associated facilities management, office equipment (including IT and telecommunications devices and software) and professional advisory services (such as legal, financial and audit services), recruitment, travel bookings, business consulting and provision of staff training and wellbeing programs.

The Group has adopted a risk-based approach to identify the material suppliers based on total annual revenue. As at 30 June 2025, the Group has 36 local and offshore material suppliers, across Australia, New Zealand, United States, Switzerland, Luxembourg, Malaysia, Singapore and Indonesia. The aggregate annual expenditure across all suppliers is approximately A\$37,929,524.

4. Risk of modern slavery in the Group's own operations and Supply Chain

Risks in our Operations:

The Group has recently undertaken a refreshed risk assessment with respect to its own operations and top suppliers during the Reporting Period, having regard to geography, industry, products and services and business-model based risks. While this risk assessment identified four operating sites with a "moderate" risk rating, being sites are located in Malaysia, Singapore and Hong Kong, the overall operational risk outcome from this risk assessment is "low".

Approximately 84% of the Group's employees are located in the Commonwealth of Australia and the rest are in the above-noted jurisdictions where we have significant operating history and experience. We comply with all labour laws and other applicable employment related legislation in all countries where the Group has employees. There have been no reports of any modern slavery practices or incidents in our operations during the Reporting Period, and we have assessed the residual risk of modern slavery in our own operations and supply chain as low.

This assessment is supported by the following factors:

- a high proportion of the Group's workforce are qualified professional patent or trade marks attorneys and lawyers, who are subject to and accustomed to complying with professional conduct rules, enshrining high ethical standards, including overriding duties to comply with the law;
- business operations for all Group operating subsidiaries, including Malaysia, Singapore and Hong Kong, are at sites where staff report into senior professionals; and
- all Group employees are paid fair market wages in compliance with legal requirements, and the employing entities within the Group are supported by experienced human resources managers with reporting lines into members of the Group's Executive Team.

Risks in our Supply Chain:

The majority of the Group's suppliers that are based in jurisdictions with higher risk for modern slavery are Overseas Associates (as opposed to Ordinary Suppliers), which are firms of qualified professional services providers (patent and trade marks attorneys or lawyers) and who are subject to their own rules of professional conduct and ethical standards. In most cases these firms are well known to, and have long-standing business relationships as trusted advisers to the Group's operating businesses. The Group has relatively few Ordinary Suppliers that are located in higher risk jurisdictions.

Going forward, the Group intends to formulate a due diligence exercise to look into and further assess modern slavery risk in our supply chain, as more fully described below.

5. Actions taken to assess and address modern slavery risks

Actions taken to assess and address the Group's exposure to modern slavery risks currently include:

5.1 A Human Rights Policy that was refreshed and approved by the QANTM Board of Directors² in November 2022. This policy references previous Modern Slavery Statements issued by QANTM, and sets out the Group's commitment to respect and support internationally recognised human rights, being the basic labour, social, political, civil, economic, and cultural rights and freedoms to which all people are entitled, as set out in the Universal Declaration of Human Rights. The policy includes specific reference to rights related to workplace health, safety and labour conditions – including freedom from slavery, servitude, bonded labour, human trafficking and child labour – and in which the Group commits to never employ or use any form of forced labour including slave, bonded, and indentured labour or any form of human trafficking, and:

- to avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur; and
- to seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.

5.2 A formal Code of Conduct, that was refreshed and approved by the Fox HoldCo Board of Directors on 25 September 2025, which articulates the high standards of honesty, integrity, ethical and law abiding behaviours expected of Group Personnel (as defined below). In this regard, Group Personnel are expected to make decisions with respect to employment and employment conditions which reflect this commitment, and make appropriate notifications in the manner outlined in the Group's Whistleblower

² The Fox HoldCo Board of Directors is now the operative Board for the Group.

Protection Policy if they become aware of circumstances which reasonably indicate that the Group, or any party with which a Group member has a business relationship, is operating contrary to these principles.

5.3 A Whistleblower Protection Policy, that was approved by the Fox HoldCo Board of Directors in August 2024, the purpose of which is to encourage reporting of matters including illegal activity, misconduct or an improper state of affairs or circumstances in relation to the Group, or any member of the Group or its operations, or involving Group Personnel.

The Group is committed to achieving this purpose by:

- having a well-communicated Code of Conduct and policies that foster upward reporting in an environment free from recriminations and victimisation;
- providing accessible, secure and reliable channels for the following parties to report any reasonably suspected wrongdoing, including by way of anonymous reporting:
 - current or former employees, officers, contractors, associates, or consultants (**Group Personnel**); and
 - their relatives, dependents or spouse, civil partner or de facto partner; and
 - external parties, including suppliers to the Group and their employees, clients and members of the public;
- supporting the right of Group Personnel to refuse to participate in wrongdoing;
- providing robust protection from retaliation, victimisation or detrimental action for individuals in connection with reports of reasonably suspected wrongdoing, and ensuring that confidentiality is maintained as required by law;
- facilitating thorough, timely, fair and impartial investigation of reports of wrongdoing by people who have the right skills, are independent to the allegations and do not have a conflict of interest;
- addressing issues identified, including by taking appropriate disciplinary action; and
- at all times complying with whistleblowing legislation in any country that the Group operates.

5.4 To support its commitment to Whistleblower Protection, the Group has also established the "QANTM Speak Up" service - an externally-managed service established to receive reports of wrongdoing by telephone, email, through an online platform or by mail. Reports received are forwarded initially to the Group General Counsel and referred to an appropriate officer for confidential assessment and referral for appropriate resolution. Any instance of modern slavery would be in breach of applicable laws in the Group's operating jurisdictions, and reports of such instances would attract the protections afforded by the Whistleblower Protection Policy.

The Group's Human Rights Policy, Group Code of Conduct and Modern Slavery Awareness Training (as defined below) refer to the Whistleblower Protection Policy, and the reporting channels under the QANTM Speak Up service, which those documents make clear are available for reporting by clients, suppliers (including Ordinary Suppliers and Overseas Associates) and their respective employees. Our FY2024 Modern Slavery Statement 2024 is accessible to our employees and suppliers on our website (at [QANTM-Modern-Slavery-Statement-FY24.pdf](#)), and will be replaced with this Statement on approval.

- 5.5 Modern slavery risk is periodically reviewed as part of the Group's risk management processes under the Group's Risk Management Policy. The key elements of the risk management structure are management oversight by the Management Risk Committee (a group of senior executives including the General Counsel, Chief Financial Officer and Chief Operating Officer, which reviews current and emerging risks for the Group, including adequacy of risk management plans and progress made against them), a risk owner (which for modern slavery is the Group General Counsel), and separate business risk registers owned by business units and functions.

The Group has an automated risk management tool which assists in cascading and tracking of risk treatment plans. The risk management framework is overseen by the Board, and the adequacy and effectiveness of the modern slavery compliance system is included in risk reporting to the Audit, Risk and Compliance Committee and also to the Fox HoldCo Board.

- 5.6 A Sanctions Compliance Policy, an update to which was approved by the Fox HoldCo Board on 25 September 2025, including a refreshed Sanctions Screening Process, applies across the Group. The Process includes comprehensive and daily third-party screening of entities and individuals in identified jurisdictions before business activities are undertaken.
- 5.7 An Anti-Bribery and Corruption Policy, which was implemented in August 2025, an update to which was approved in September 2025.

Following the acquisition of the Group by funds controlled by Adamantem Capital in August 2024, the focus of the Group during the Reporting Period has been to embark on a general uplift of the risk management framework and risk reporting requirements, in line with Adamantem's responsible investment thesis.

Future actions to address modern slavery risks will include strengthening governance practices across procurement, supply chain and modern slavery risk management, as set out below.

During the Reporting Period and in the period prior to the production of this Statement, Bespoke internal training delivered by the Group General Counsel to Group Personnel has continued, with 63.13% of relevant personnel having completed the training to date. The objectives of this training are threefold:

- increase awareness of the large-scale, global issue of modern slavery and equip individuals with an understanding of the key indicators to look for when identifying concerns regarding modern slavery in their business dealings;
- highlight a range of informative and educational resources and training sessions available to Group Personnel through the internal training hub iQ Online; and
- highlight the QANTM toolkit/resources available to Group Personnel containing the policies and processes used by the Group to identify, detect and prevent modern slavery in our business and the multiple reporting channels under the QANTM Speak Up service, should there be any concerns or suspicions regarding modern slavery (**Modern Slavery Awareness Training**).

6. Assessment of the effectiveness of actions taken

We continue to believe that our modern slavery risk mitigation initiatives are reasonable and proportionate to the modern slavery risk profile of the Group's businesses, and that it helps to mitigate the risks of modern slavery in our supply chain.

Focusing on continuous improvement, in the next reporting period we plan to conduct a further risk assessment, implement a Procurement Policy across the Group and enter into

a Supplier Code of Conduct with key suppliers. We also intend to continue working collaboratively with our Overseas Associates, Ordinary Suppliers and current/prospective clients, including by making our governance materials relevant to modern slavery available for sharing and adaptation, where applicable. We will continue with the uplift to the Group's overall risk management framework, including continuing to bed down the updated Sanctions Policy and compliance programme, which includes the introduction of know your client identification requirements, and conducting a risk assessment under our Anti-Bribery and Corruption Policy.

7. Consultation with Group entities

The Group has engaged with its various operating businesses through discussion items at meetings of the Group Executive Team, and with the Directors, Managing Principals and other leaders of the operating businesses which deal with the targeted higher risk suppliers.

Progress on risk management actions are also reported to and discussed in risk and compliance updates which are standing agenda items at Group Executive Team meetings, and are also reported on to the Audit, Risk and Compliance Committee.

8. Other relevant information

The Group strongly supports fundamental human rights and the prevention of modern slavery and human trafficking. In addition to continuing to embed risk mitigation items into our company processes and culture, we will be considering ways we may enhance the program, such as how we can effectively and feasibly expand the program to reach deeper into our supply chain beyond our first-tier suppliers.

The reality is that ensuring slavery and human trafficking is not taking place anywhere in the Group's supply chain, and especially at tiers beyond our direct (first tier) suppliers, is likely to remain a significant ongoing challenge for the foreseeable future. However, we have implemented a risk-based approach and are committed to achieving continuous improvement through the actions described in this Statement. The Group is committed to the spirit and intent of the Act.

9. Board approval

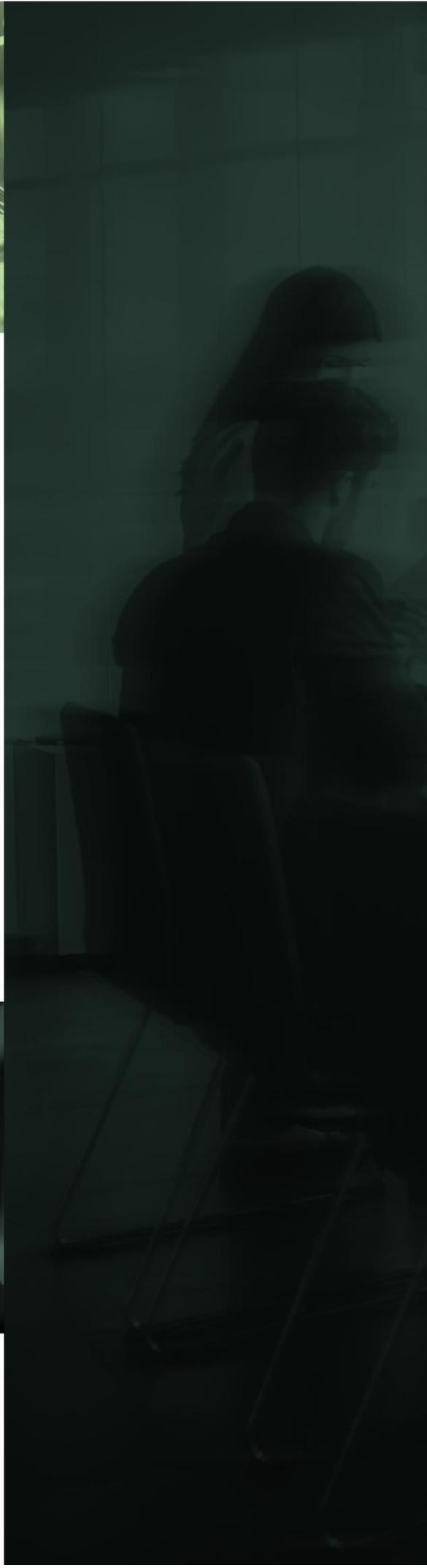
This statement has been approved by the Board of Directors of Fox HoldCo Limited on 27 November 2025 and is signed by Michael Wolnizer as director of Fox HoldCo Limited.



10. Mandatory Criteria

This Statement has been prepared to meet the mandatory reporting criteria of the Act as follows:

Mandatory Criteria	Section
Identify the reporting entity	1
Describe the reporting entity's structure, operations and supply chain	1, 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 controls	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	5
Describe how the reporting entity assesses the effectiveness of these actions	6
Describe the process of consultation that any entities that the reporting entity owns or controls	7
Provide any other relevant information	8



 IP