

Modern Slavery Statement

MGA Whittles Group | Reporting period 1 July 2025 to 30 June 2026



1. Introduction and reporting entity

- 1.1 This statement is made by MGA Management Services Pty Ltd (ABN 47 008 210 482) for the reporting period 1 July 2025 to 30 June 2026. It is given under section 13 of the *Modern Slavery Act 2018* (Cth) and is submitted to the Modern Slavery Statements Register within six months of the end of the reporting period.
- 1.2 MGA Management Services Pty Ltd is the only entity in the group that meets the consolidated revenue threshold and is therefore the sole reporting entity. This statement covers MGA Management Services Pty Ltd and the entities it owns or controls.
- 1.3 MGA Management Services Pty Ltd holds a majority interest in each of those entities and consolidates them for financial reporting purposes. Together, they are referred to in this statement as the Group, we or our.

2. Our structure, operations and supply chains

2.1 Structure and operations

- (a) The Group operates four businesses:

BUSINESS	WHAT IT DOES
MGA	General insurance broking and advisory services to retail and commercial clients through a network of authorised representatives across South Australia, Victoria, Queensland, New South Wales, the Northern Territory and the Australian Capital Territory.
Whittles	Strata and community title management for bodies corporate, owners corporations and strata corporations in South Australia, Victoria, Queensland, the Northern Territory and the Australian Capital Territory.
Millennium	Underwriting agency operating under delegated authority from licensed insurers and cover holder of Lloyds of London.
MGA EziPay	General insurance premium funding.

- (b) We employ approximately 220 people, all of whom are located in Australia and engaged under Australian employment instruments. MGA engages approximately 62 corporate authorised representatives who operate their own businesses under our licence. Whittles also engages

approximately 40 contractors who manage the strata corporations on behalf of Whittles.

2.2 Supply chain

The goods and services we buy for our own operations are:

- (a) insurers and underwriting agencies;
- (b) IT software and hardware;
- (c) telecommunications;
- (d) professional and consultancy services;
- (e) banking;
- (f) marketing and print;
- (g) office premises;
- (h) cleaning and facilities services;
- (i) recruitment and labour hire; and
- (j) outsourced administration and accounts support, including offshore providers.

3. Modern slavery risks in our operations and supply chains

We assessed risk against the four indicators used in Australian guidance:

- (a) sector and industry;
- (b) geography;
- (c) product and service; and
- (d) entity or supply chain model.

For each area we also considered where we would sit on the continuum used in the UN Guiding Principles on Business and Human Rights, that is, whether we would have caused the harm, contributed to it, or be directly linked to it through a business relationship. That question determines what is expected of us in response, and it shapes the actions described in section 4.

3.1 Our own operations

We assess the risk of modern slavery within our own workforce as low. Our employees are office based, work in a highly regulated financial services and property services environment, are covered by Australian awards and employment instruments, and are engaged directly rather than through labour hire. Right to work and reference checks are completed before employment commences. The strata managers engaged as contractors, and the authorised representatives referred to in section 2.1, operate their own businesses and are subject to the expectations set out in our Modern Slavery Policy.

3.2 Our supply chain

- (a) The higher risk areas we identified are set out below.

AREA	WHY IT CARRIES RISK	ASSESSED RISK
Offshore outsourced administration and accounts services	Services are delivered from jurisdictions with a higher assessed prevalence of modern slavery. Risk arises through recruitment practices, recruitment fees charged to workers, and the provider's own subcontracting.	Medium
Cleaning and facilities services at our own offices	Cleaning is consistently identified as an elevated risk sector in Australia. It is characterised by subcontracting, low margins and a workforce with a high proportion of migrant and visa dependent workers.	Medium
Labour hire	Labour hire is a recognised risk channel, particularly where workers are placed through intermediaries.	Low to medium
IT hardware, uniforms, print and promotional items	Manufacturing supply chains extend to jurisdictions with elevated risk. We buy these as finished goods and have limited visibility beyond the reseller.	Low to medium
Insurers, underwriting agencies, banks and professional services	Large, regulated, predominantly Australian based organisations with office based workforces.	Low

- (b) We recognise that our visibility diminishes beyond our direct suppliers, and that risk is more likely to sit with subcontractors and further down the chain than with the entities we contract with. Our approach for this period has been to focus on direct suppliers in the categories above.
- (c) During the reporting period we did not identify any instance of modern slavery in our operations or supply chain.

4. Actions taken to assess and address these risks

4.1 During the reporting period we:

- (a) drafted a modern slavery clause;
- (b) assessed our supplier base against the four risk indicators and identified the categories set out in section 3;
- (c) reviewed our offshore outsourcing arrangements, including the labour standards and recruitment practices of the provider;

- (d) published a list of practical indicators as an annexure to the policy, so that the people most likely to encounter modern slavery, being our strata managers and the staff who attend sites, know what to look for and where to report it;
 - (e) maintained our Whistleblower Policy as our grievance mechanism to our own personnel, alongside the standards of behaviour set out in our Code of Conduct; and
 - (f) made modern slavery awareness training available to staff in procurement, contracting and strata contractor engagement roles.
- 4.2 Where modern slavery is identified, our response depends on our connection to it. If we caused or contributed to it, we provide or contribute to remediation for the affected worker and correct the practice that allowed it. If we are directly linked to it through a supplier, we require the supplier to remediate within a stated timeframe and use our commercial leverage to see that it does. If the supplier will not act, the matter is escalated to the relevant Executive Team and we consider ending the engagement, having first considered whether exiting would leave the affected workers worse off. In every case the first consideration is the affected worker rather than our commercial position, and any identified instance is reported to the Board.

5. How we assess the effectiveness of our actions

- 5.1 This is our first reporting period. Most of the actions described in section 4 were put in place during the period rather than operating across it, so we have set out how we will assess whether they are working rather than reporting on effectiveness we have not yet been able to measure.
- 5.2 We collect the following each quarter:
- (a) the proportion of new and renewed supplier agreements that include a modern slavery clause;
 - (b) the number of suppliers or contractors referred for further enquiry, and the outcome of each;
 - (c) completion of modern slavery training within the target group; and
 - (d) the number of concerns raised, and what was done about each.
- 5.3 When this statement is prepared each year we review whether the measures are telling us anything useful and change them if they are not. The underlying risk assessment is refreshed at least every 2 years, and earlier if our operations or supplier base change materially.
- 5.4 We have not set numerical targets in this first period. We do not yet have a baseline, and a target set without one would not tell us, or anyone reading this statement, whether the controls are working.

6. Consultation with entities we own or control

- 6.1 This statement was prepared by the Legal and Compliance Manager with input from Finance, People and Culture, IT, and the leadership of the MGA and Whittles businesses. The Group operates shared legal, compliance, finance and people functions across all entities, so consultation occurs through those functions rather than through a separate structure.
- 6.2 For this reporting period, consultation was carried out by circulating the draft risk assessment and this statement to the directors of each entity covered, inviting comment on the risk areas identified and on any supplier arrangements specific to that entity, and recording the responses.

7. Other relevant information

Priorities for the next reporting period are to:

- (a) adopt a Modern Slavery Policy, approved by the Board, covering all Group entities;
- (b) adopt a standard modern slavery clause for supplier agreements, requiring suppliers to comply with modern slavery laws, to maintain their own policies and procedures, to notify us of any allegation, and to provide the information we need for our own reporting;
- (c) extend the modern slavery clause to the balance of our labour hire agents;
- (d) introduce a vetting process for the suppliers we engage, with specific checks for the elevated risk categories, supported by a questionnaire for labour hire and recruitment agencies and for offshore and outsourced service providers; and
- (e) monitor the Commonwealth reform program, including the proposed failure to prevent offence and civil penalties announced in July 2026, and adjust our controls accordingly.

8. Approval

This statement was approved by the Board of MGA Management Services Pty Ltd, as the principal governing body of the reporting entity. It is signed below by Paul George, a director of MGA Management Services Pty Ltd who is authorised by the Board to sign modern slavery statements for the purposes of the Act.



Paul George

Director, MGA Management Services Pty Ltd

