



Modern Slavery Statement

FY2025

Acknowledgement of Country

Mantel acknowledges the Traditional Custodians of the land on which we work from and live. We acknowledge their continuing connection to land, water and community. We pay our respects to all Indigenous peoples, cultures, and Elders past, present and future.

Introduction

Modern slavery is an ongoing issue worldwide. The World Economic Forum has found that slavery in supply chains amounts to \$150 billion USD of illicit profits a year and that there are 46 million victims of modern slavery. Unfortunately, two-thirds of modern slavery occurs in the Asia – Pacific region, where many Australian supply chains extend.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as:

- slavery, servitude (coercing someone to provide services) and forced and compulsory labour and child labour;
- human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited);
- committing any offence with the intention to commit human trafficking; and
- aiding, abetting, counselling or procuring any of the above offences.

All of these practices deprive individuals of their liberty in order to exploit them for personal or commercial gain. Mantel has a commitment to conduct its business and all its relationships based on integrity.

Mantel has a zero tolerance approach to all forms of modern slavery and human trafficking within its business and within its supply chain and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place in its own business or in any of its supply chains.

This statement has been prepared by Mantel Group Pty Ltd ACN 622 268 240 and its subsidiaries ("Mantel") in accordance with the Modern Slavery Act 2018.

This statement was approved by the Board of Directors of Mantel Group in their capacity as principal governing body of Mantel Group Pty Ltd on 9 December 2025.



Michael Bodle

Director & Company Secretary

Mantel operates under the ultimate Australian parent company Mantel Group Pty Ltd (ACN 622 268 240) and its wholly owned Australian & New Zealand subsidiaries:

- Mantel HoldCo Pty Ltd (ACN: 656 235 808)
- Mantel MidCo Pty Ltd (ACN: 656 236 225)
- Mantel BidCo Pty Ltd (ACN: 656 236 396)
- Mantel Operations Pty Ltd (ACN: 656 235 559)
- Mantel Operations Ltd (NZBN: 9429050658558)
- Transform Properties Pty Ltd t/a CMD Solutions (ACN: 143 707 582)
- Pretzel Lab Pty Ltd (ACN: 646 457 865)
- Kasma Cloud Pty Ltd (ACN: 629 424 255)
- Itty Bitty Apps Pty Ltd (ACN: 137 547 838)
- Itty Bitty Labs Pty Ltd (ACN: 611 542 262)
- Eliiza Pty Ltd (ACN: 622 520 594)
- DigLO Pty Ltd (ACN: 622 520 558)
- Cuusoo Pty Ltd (ACN: 648 940 336)
- Azenix Pty Ltd (ACN: 647 695 323)
- Aginic Group Pty Ltd (ACN: 624 071 076)
- Aginic Holdings Pty Ltd (ACN: 618 003 419)

Our structure, operations and supply chains

Our structure & operations

Founded in 2017, Mantel is an Information Technology (IT) Professional Services organisation with a focus on providing end-to-end technology solutions and services to Australian and New Zealand clients across five capability pillars:

- Data & AI
- Cloud
- Digital
- Cyber Security
- Managed Services

We have over 800 team members, with the vast majority permanent employees, in Australia and New Zealand. In 2025 we also established a Vietnam capability.

Our permanent employees within Australia and New Zealand are directly employed by Mantel, with our personnel in Vietnam provided through our supplier.

We currently do not outsource or offshore any of our key business operations. Operations including Payroll, Finance, Talent Acquisition, Marketing and Sales are all delivered in-house through our employees.

Where Mantel operates



Our supply chains

The majority of suppliers we engage with are based in Australia, New Zealand and Vietnam. The main categories of goods and services that we procure are:

- 01 Building management:** office spaces, leasing, maintenance and repairs, and security.
- 02 Professional cleaning and maintenance services:** office cleaning services and plant maintenance.
- 03 Contractor recruitment:** recruitment services for contracted employees.
- 04 Information technology (IT) and software:** company mobile phones, computer hardware and software and cloud services.
- 05 Technology partnerships:** key technology and cloud service providers that Mantel collaborates with during projects, conferences and networking events.
- 06 Merchandising:** company merchandise such as branded t-shirts, lanyards and stationery.
- 07 Food, beverages and catering:** food, beverages and everyday needs for offices and catering for company events.
- 08 Vietnam team management:** establishment and management of our Vietnam team members.



Assessment of modern slavery risks

In the reporting period, Mantel assessed the risk of Modern Slavery within our supply chain and operations as low. The inherent nature of professional services means that the risk in our operations is low, however, we conducted an analysis into all of our major suppliers, assessing their modern slavery statements and practices. As part of this analysis, we considered:

- geographical location and presence of vulnerable populations;
- adherence to mandatory laws and ethical codes;
- monitoring of forced labour indicators;
- verification through independent audits and assessments; and
- establishment of grievance channels.

Each supplier was categorised as “lower inherent risk” or “higher inherent risk”. Certain suppliers were omitted due to the smaller nature of their operations, however, Mantel continues to work closely with each supplier to ensure modern slavery is actively being prevented.

Suppliers with higher inherent risk

Vietnam team management

Mantel engages a supplier that supports the establishment and scale up of our Vietnam presence. The team members in Vietnam are recruited and employed by this supplier.

Mantel recognises the potential modern slavery risks associated with this supplier and operations in Vietnam. As such, we work closely with the supplier to minimise the risks and ensure that robust controls are in place, including a supplier modern slavery risk questionnaire, to detect and prevent modern slavery.

Merchandising, catering and professional cleaning services

Mantel acknowledges that our suppliers that provide merchandising, catering and professional cleaning services face higher inherent risks due to the nature of their work, and their global, multi-layered supply chains. Each of these suppliers have strict controls in place including mandatory supplier approval processes, third-party audits and code of conducts resulting in a low overall risk of modern slavery.

Actions taken to assess and address modern slavery risks

Mantel is committed to ensuring adherence to our goal of preventing, detecting and reporting modern slavery in every part of our supply chain. We actively encourage those working on the Company's behalf to avoid any activity that may lead to, or suggest, a breach of this commitment.

We proactively addresses the risk of modern slavery by implementing the following initiatives and controls.

Quarterly remuneration reviews

Mantel ensures our employees and direct contractors are remunerated appropriately. We conduct market and award reviews of our remuneration quarterly.

Supplier onboarding assessment

Mantel is committed to verifying that our suppliers are in compliance with the Modern Slavery Act 2018, where applicable. We engage directly with new suppliers in respect of our anti-slavery policy to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.

Supplier compliance monitoring

Once a supplier has been onboarded, Mantel conducts annual modern slavery reviews, assessing each supplier with a modern slavery statement against our criteria and the Modern Slavery Act 2018. Where we identify potential risks, we engage directly with the supplier to ensure they have effective controls in place to prevent modern slavery.

Higher-risk supplier modern slavery questionnaire

We understand that due to the nature and location of their operations, our supplier for our Vietnam operations is at greater risk of modern slavery. Mantel has developed a compliance questionnaire for the supplier to complete annually that requires them to detail their supply chain and operations, anti-slavery training procedures and due-diligence activities.

Contractual documentation

Our contractual documentation for appropriate suppliers incorporates specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy.

Modern slavery training

Mantel provides mandatory modern slavery training to all our employees during onboarding, with a regular refresher for all employees. This training covers the definitions and examples of modern slavery and the processes to prevent, identify and report modern slavery.



Assessing the effectiveness of our actions

Our People and Culture, Finance and Operations teams continually monitor the effectiveness of the approach to Modern Slavery using the following methods.

Conducting and comparing periodic reviews

Mantel conducts annual reviews into our major suppliers to understand their anti-slavery controls and processes. We compare these results over time and identify any changes that may indicate higher risk of modern slavery. If higher risk is detected, we work closely with our suppliers to minimise or remediate issues.

Training completion rates

Modern slavery training is part of our compulsory employee onboarding process with refresher sessions provided annually. We track completion rates with the aim of achieving 100% completion.

Review any modern slavery cases

If modern slavery is detected in our organisation or raised by an employee, we thoroughly review each case, ensuring the issue is remediated and our controls are strengthened to prevent future instances.

Our consultation process

This statement was prepared in consultation with each entity covered by this report and was endorsed by the Board of Mantel Group Pty Ltd as the ultimate parent entity of the group, at the board meeting held on 09 December 2025.



Mantel principles

Mantel Group is a principle-based organisation. Our decisions and behaviour are driven by our 5 principles. We believe that this approach enhances our commitment to eliminating Modern Slavery. Particularly through our principles "Make Good Choices" & "Make Things Better".



We're common sense people, good judgement people, gut instinct people. We trust ourselves and each other to make the best decisions for the company, for our clients and the team.

We're all adults. We honour our commitments, and prioritise our clients. We understand expectations and don't need a whole lot of rules to tell us how to behave, or when or where to work. Because we're adults, we're treated that way.

We're mature enough to ask our team for help, and we actively and enthusiastically help each other in return.

If we don't know what to do, we'll use that common sense and try something else. We might be right (or close enough to right to keep moving forward). We're ok with being wrong and changing our approach – the process of learning something new helps us make better decisions. We take responsibility for our actions, and if we break things, we fix them.

Processes and plans are important, but not followed blindly – there's always room for improvement.

Each of us makes it a priority to understand our business, obligations, challenges and clients so we can make good choices.



We transform things for the better, build enduring relationships, and contribute to our community.

We share the things we've learnt and always think about our legacies – on the project, with our client and in our team. We embrace challenges and adapt our approach as new information comes to light. We learn from experience and use this knowledge to make things better. We remember our past experiences fondly, but there is no place for nostalgia – we are future focused!

We don't walk past things that are wrong or where we could make a difference – we roll up our sleeves and help in the best way we can. We're not bystanders. We are creating something that matters; that's hard work, but we can make a positive change if we all chip in. We volunteer for the tough stuff.

Our company has been founded to change the way things get done for the better. We are technology pioneers. It's our strength and our challenge – embrace it!



In It Together

We are a people business. Our uniqueness and value come from our people and the meaningful interactions we create within the team, with our clients and theirs.

We genuinely care about our teammates and want the best for everyone. We create a space where we can have a laugh and enjoy our work and working together. We are generous with our time and support.

Supporting one another and our clients is good for people and good for business. Everybody is different, and we know that support means different things to each person and it changes over time. We're going to look after each other, even if it means some short-term pain – we take a long-term view. We've got each other's backs.

We embrace and celebrate each other's originality, uniqueness and authenticity. We value diverse thoughts, perspectives and backgrounds, while also knowing when to present as a united front to clients.

We value humility and substance, and we learn from each other's experiences, knowing that each of us has walked a different path and that will greatly influence our view of the world.



Communicate Directly

Communication is central to everything we do. It is a crucial part of each of our jobs, and we do so directly, not pushed through a hierarchy. We ensure clarity of purpose and understanding of expectations by communicating clearly; multiple times if needed.

We listen to genuinely understand. We are each responsible for our own connections – we need to tell people what is going on, through the best channel available, and seek out information ourselves – “no one told me” is never an excuse.

We speak our minds with respect, compassion and context. We talk directly to each other, using the right communication tool for our message. We have meetings only when they are needed and focus on outcomes.

We have strong opinions, loosely held. We are brave; stating our opinion or case even if it's not the existing consensus view, and we are prepared to change our minds when we learn something new. We are not afraid to disagree with or question each other, we value each other's ideas, and when the decision is made, we respect it. We're better than corporate politics.



Love what you do
& be awesome at it

Our people are seriously talented!

We recruit high calibre people who'll thrive in our environment and who know that important things are worth the hard work. We hire people that will enhance our team and who we can learn from – people who inspire us, people who are rare. We look for potential and the drive to be great.

We recruit awesome people and then get out of their way to allow them to be their best. This is a brilliant place to work because we trust each other to perform and deliver, and continue to strive for optimum outcomes for our clients and each other. We are self-motivated and driven.

Attracting and recruiting top-notch people is a collective responsibility. Every single role is important, and every single role has the right person in it – for the business, for the team, for the client and for that person to get genuine satisfaction from excelling in their role.

