

Davidson Group (Aust) Pty Ltd and Subsidiaries

Joint Modern Slavery Statement

For the reporting period of 1 July 2024 – 30 June 2025

Introduction

Davidson Group is committed to eradicating acts of human trafficking, debt bondage, child or forced labour, servitude, slavery and other slavery like practices. Being above the annual turnover threshold, Davidson Group acknowledges responsibility under the *Modern Slavery Act 2018* (Cth) and will ensure transparency within the Group's organisation and our supply chains.

This statement is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) on behalf of Davidson Group (Aust) Pty Ltd (ABN 43 167 652 155) and its subsidiaries including:

- Davidson Executive and Boards Pty Ltd (ABN 89 167 748 816)
- Davidson Group Services Pty Ltd (ABN 85 124 816 708)
- Davidson HR Consulting Pty Ltd (ABN 38 161 578 310)
- Davidson Recruitment Pty Ltd (ABN 50 167 132 523)
- Davidson Technology (Aust) Pty Ltd (ABN 51 167 752 258)
- Davidson Technology Consulting Pty Ltd (ABN 23 163 298 379), and
- Inspired Apps Pty Ltd (ABN 71 145 171 071)

(together, **Davidson, the Group, Davidson Group, we, our, or us**)

Structure & Consultation

A privately owned business operating in Australia for over 30 years, Davidson is committed to enhancing workplace performance. Davidson has a national presence with offices in Brisbane, Sydney, Melbourne, Adelaide, Canberra and Darwin engaging circa 150 internal employees and 800 contractors and consultants delivering services for our clients. Davidson delivers services through three integrated service lines: Business Advisory, Search and Recruitment, and Technology Consulting. Across all areas, we focus on delivering customised, ethical, and outcomes-driven solutions that create long-term value for our clients, candidates, and the broader community. The effective control and management of the Davidson Group (including all reporting entities and subsidiaries above) is held by the Davidson Group (Aust) Pty Ltd Board, who are assisted by their appointed executive leadership team. Davidson Group shares corporate functions such as risk, legal, human resources, marketing, information technology, cyber security and finance. All subsidiaries within the Davidson Group are subject to Davidson Group policies, procedures, and standards.

Consultation occurred with each subsidiary through structured engagement between legal, risk & compliance, human resources, finance and operational leads. Subsidiaries reviewed and confirmed draft content, supplied operational and supply chain information, and were briefed on their obligations under Davidson Group's modern slavery framework. Each Davidson Group entity is made aware of required actions to assess and address modern slavery risks.

Operations, supply chains & risks

Australian services

In our recruitment and labour hire service lines, Davidson Group provides on-hire independent contractors and employees with equitable, fair, and legally compliant working conditions. We understand the critical importance of adhering to modern slavery obligations. Currently, the majority of our candidates and employees are sourced from Australia and engaged in Australia under Australian law, benefitting from a jurisdiction with well-established labour laws and robust worker rights protection. Our consulting and advisory service lines also prioritise the welfare of our personnel and are currently based in Australia. Davidson does not provide candidates or professional services to sectors known to present a heightened risks of labour law non-compliance in Australia, such as meat and poultry processing, commercial cleaning, security and horticulture.

Offshore Arrangements

Davidson has commenced partnering on a limited basis with international companies to provide offshore labour-hire and professional services to Davidson and our clients. These arrangements form part of Davidson's extended supply chain and

can involve workers engaged outside Australia under local employment laws. These engagements are used selectively and currently represent only a small portion of Davidson's service delivery.

Suppliers

Davidson Group engages a relatively small number of suppliers, most of whom are based in Australia. Davidson Group's supply chain includes service providers who provide support in the areas of maintenance and cleaning, property management, security, information technology infrastructure, financial services, office supplies, consumables and other support services including staffing, legal and employee benefit providers. Some upstream risks may exist in indirect tiers of our supply chain, particularly in IT hardware and software and where global supply chains may involve higher-risk jurisdictions. These risks are low-level for our business model but monitored through vendor due diligence.

In line with our commitment to addressing modern slavery, we have assessed our direct operations in Australia as **low risk**. We take a proactive approach to identify, prevent, and mitigate modern slavery risks, even in low risk environments. As our offshore labour-hire arrangements present increased inherent risk based on geographic and sector considerations, offshore arrangements are assessed as having **elevated or moderate** risk. These risks are actively managed through enhanced due diligence and supplier engagement.

Actions to address risk

Policies and processes

Davidson Group has a suite of policies to ensure working conditions are compliant with Australian laws and free of modern slavery. Our policies apply to internal employees as well as contractors and consultants. Our commitment is to provide a workplace that prioritises safety and is free from any discrimination.

Davidson verifies the identity and right to work of individuals as part of onboarding. Regular audits of wages, working hours, and overall conditions are conducted to verify ongoing compliance. We maintain communication with our employees, contractors, and suppliers to address any operational or supply chain practices that may pose risks related to modern slavery. In instances where direct supervision of contractors by Davidson or our clients is impractical (for example, where the contractors are working remotely or from home), we have established systems including check-ins and remote work risk assessments to facilitate open communication and to promptly identify and address any potential modern slavery risks.

Prior to engagement, all suppliers undergo appropriate due diligence. Where suppliers operate outside Australia, Davidson applies additional checks to confirm their compliance with modern slavery requirements. Davidson Group's contracts require all suppliers to comply with our modern slavery standards and ensure equivalent compliance within their own operations and supply chains.

Davidson's established Modern Slavery Working Group consisting of the Risk & Compliance Partner and Legal Counsel is tasked with continuously assessing its risks and approach to modern slavery compliance and ensuring that this approach is considered during any procurement processes with clients. Over the last twelve months, Davidson's Modern Slavery Working Group met bi-monthly and adopted a structured approach to due diligence and reporting. For example, a dedicated modern slavery reporting feature has been introduced in our customer relationship management system to improve visibility of actions, risks and follow-up steps across business units.

Davidson Group's Modern Slavery Policy embodies our methodologies and protocols for recognising modern slavery risks. It underscores Davidson Group's unwavering commitment to ethical practices and integrity in all our business relationships, particularly within our supply chain. As part of our proactive approach to risk identification and mitigation, we have established systems and procedures to:

- Identify and evaluate potential risk areas in our workplaces and supply chains.
- Conduct due diligence to identify and mitigate the risks of slavery and human trafficking associated with our operations and supply chains.
- Develop, enhance, and implement appropriate remediation frameworks and measures.
- Safeguard whistleblowers who play a crucial role in exposing malpractices.

If concerns are identified, we have agreed and contractual processes to facilitate collaboration with supply chain members to formulate corrective actions within appropriate and mutually agreed timeframes or remediation plans.

Assessing effectiveness

To gauge the effectiveness of our modern slavery approach, Davidson records actions and outcomes in its risk register. Under the guidance, supervision and stewardship of the Board, Davidson Group is supported by a dedicated Risk Committee and risk and compliance team. This team helps oversee compliance of our employees, contractor staff, suppliers and extended supply chain members. The external legal compliance of Davidson Group, along with its adherence to internal policies and practices undergoes ongoing scheduled and 'as required' checks and reviews throughout the year by this team as well as input from external legal and compliance specialists.

Additionally, Davidson Group holds ISO9001:2015 certification for its quality management system. This certification entails conducting internal and external audits at scheduled intervals throughout the year. These internal audits are designed to identify risks in various aspects of our organisation, including compliance, resources, operational control, competence, and monitoring. This external validation and certification reinforce our commitment to maintaining high-quality standards and regulatory compliance in all facets of our operations.

Key indicators used to assess effectiveness include:

- completion rates for mandatory modern slavery training;
- number of supplier assessments conducted;
- frequency and outcomes of Working Group meetings;
- audit findings recorded in the risk register; and
- the number of incidents reported through grievance or whistleblower channels

2024/25

Risk Management

In the financial year 2024/25, Davidson reviewed and refined methodology for managing risks within its operations and supply chains. The Risk Committee and Modern Slavery Working Group continued to serve as a dedicated forum for Davidson to actively initiate discussions, scrutinise, and assess comprehensive risk mitigation strategies in relation to identified or suspected modern slavery within our supply chains.

Training & Policies

In the previous financial year, Davidson Group continued to include a mandatory modern slavery training as part of its staff compliance requirements (and this training is included as part of any onboarding requirements for all Davidson staff). This compulsory training module delivers a comprehensive overview to all Davidson staff outlining their obligations, strategies, and consequences pertaining to modern slavery within Australian supply chains.

To ensure ongoing awareness, Davidson staff and contractors receive updates on modern slavery information through a dedicated resources page on the Davidson intranet. This page offers valuable summaries and links to further information as well.

Governance and Oversight

Davidson actively monitored developments in legislation and international regulatory trends, including the Australian Government's proposed reforms to the *Modern Slavery Act 2018 (Cth)* and emerging EU human rights due diligence requirements.

Integration with ESG and Continuous Improvement

Davidson's approach to modern slavery sits within its broader environmental, social and governance (ESG) framework and core values.

During the reporting period, Davidson prepared and published an ESG Report for the Group, outlining how ESG and human rights considerations are being incorporated into day-to-day operations.

Davidson will continue to develop its ESG-related due diligence processes, strengthen supplier engagement on modern slavery risks, and align its practices with evolving legislative requirements and recognised international standards on business and human rights.

Assessment

We have not identified any suspected or actual instances of modern slavery through audit programs this year, and we have deemed our actions as satisfactory.

LOOKING FORWARD

As we progress, Davidson Group will continuously review and develop frameworks to identify, assess and manage modern slavery risks in our operations and supply chains, including offshore labour-hire arrangements, and make improvements.

Over the next year, Davidson Group will continue to focus on:

- monitoring guidance, activities and publications of the Anti-Slavery Commissioner and incorporating relevant actions into our approach;
- reviewing and updating our suite of ESG and risk-related policies, contractual standards and governance controls, with specific attention to offshore labour-hire providers and higher-risk categories of goods and services;
- engaging with key stakeholders, including suppliers and industry bodies, on modern slavery issues, practical risk-management strategies and expectations for due diligence.

APPROVAL

This joint statement is submitted by Davidson Group (Aust) Pty Ltd and on behalf of its subsidiaries. The Board of Davidson Group (Aust) Pty Ltd officially approved this statement on 15 December 2025.

Trent McMahon

Trent McMahon
Director
On behalf of the Board of Directors of Davidson Group (Aust) Pty Ltd

CERTIFICATE *of* SIGNATURE

REF. NUMBER
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15 DEC 2025 01:46:02
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SIGNER

TRENT MCMAHON

EMAIL
TRENT.MCMAHON@DAVIDSONWP.COM

TIMESTAMP

SENT
14 DEC 2025 23:28:00

VIEWED
15 DEC 2025 00:59:13

SIGNED
15 DEC 2025 01:46:02

SIGNATURE



IP ADDRESS
116.206.216.89

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BRISBANE, AUSTRALIA

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