

AVADA Group Limited

Modern Slavery Statement

2025

Introduction

This is the third Modern Slavery Statement (**Statement**) of AVADA Group Limited ABN 57 648 988 783 (**AVADA**) and its controlled entities (together **AVADA Group**).

This statement is given pursuant to the Modern Slavery Act 2018 (Cth) (**Act**). It relates to the reporting period 1 July 2024 to 30 June 2025 (**Reporting Period**).

AVADA affirms its commitment to ending all forms of modern slavery. This Statement outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations. We are committed to looking after our people, our communities and our planet. We set out our key initiatives in our annual Sustainability Reports.

We are committed to conducting business to the highest possible ethical standards as stated in our Group Corporate Governance Charter and Anti-bribery and Anti-corruption Policy. As we continue to grow as a business, we are committed to collaborating with our people, customers, suppliers, and shareholders to collectively improve our ability to manage the challenges that modern slavery presents and to protect fundamental human rights for everyone who interacts with us.

The sections of this statement correspond with the reporting criteria under the Act.

Criteria 1 – Reporting entities

This statement covers AVADA and each entity in AVADA Group.

This statement was prepared for AVADA Group as a whole. References to "we" or "our" are references to AVADA Group.

Criteria 2 – AVADA Group's structure, operations and supply chains

Our businesses

AVADA Group is an integrated traffic management provider in Australia and New Zealand, with established operations throughout Queensland, New South Wales, Victoria and New Zealand, servicing major public and private sector clients. Traffic management is a legislative requirement with regulations prescribing the operational requirements for work on or adjacent to roads. It is an essential service for civil infrastructure and maintenance works, with consistent workflow provided by investment in new projects and recurring maintenance requirements.

Structure

AVADA is a public company listed on the Australian Securities Exchange (ASX: AVD) with its head office located in Woolloongabba, Queensland.

As at 30 June 2025, AVADA had 18 wholly owned or controlled subsidiary entities and one unincorporated joint venture (Bilingarra Indigenous Services Pty Ltd). All controlled entities are incorporated in Australia or New Zealand and operate solely within Australia or New Zealand.

The reporting entities identified under Criteria 1 have the following functions:

- AVADA Group Limited is the listed entity and parent company of AVADA Group.

As all subsidiary businesses are owned by AVADA Group, their operations are included in this Statement.

Our operations

AVADA Group has established operations throughout Queensland, New South Wales, Victoria and New Zealand servicing major public and private sector clients. With an extensive network of 25 Depots, 1,050 vehicles and 2,100 dedicated employees the Group is well positioned in the integrated traffic management and associated civil sectors.



Our team

AVADA Group employs more than 2,077⁽¹⁾ team members in Australia and New Zealand, with the majority employed as traffic controllers in our integrated traffic management business. The other employees are located at AVADA's head office and support functions within depots and business units.

AVADA Group employees are employed under full-time, parti-time or casual arrangements. All employees work across our operations in Australia and New Zealand.

(1) At 30 June 2025

Supply chain

AVADA Group's supply chain covers a broad range of goods and services associated with the operation of its business including fuel, vehicle supply, vehicle maintenance, traffic equipment, property, systems and corporate services.

AVADA Group had a recorded external spend of approximately \$38 million for the year ending 30 June 2025 with 1819 external suppliers. AVADA Group has contractual arrangements with suppliers for major recurring spend. AVADA Group's external suppliers consist of:

- 16% fuel supply from distributors in Australia and New Zealand
- 14% vehicle supply, sourced direct through OEM networks
- 11% equipment and signage supply
- 1% travel.

Criteria 3 - Risks of modern slavery practices in AVADA Group's operations and supply chains

The 'Walk Free' Global Slavery Index published in 2025 commented in respect of Australia:

"Australia, as a country with relatively higher levels of wealth, and therefore more resources to dedicate to addressing modern slavery, had the strongest government response to modern slavery in the Asia Pacific region, and the second strongest response globally."

As described in the UN Guiding Principles on Business and Human Rights, the risk of modern slavery involves the possibility that AVADA Group could inadvertently cause, contribute to, or be directly or indirectly linked to instances of modern slavery within its operations and supply chains.

For AVADA Group, the potential risks of modern slavery primarily manifest in respect of the procurement of goods and services in connection with its traffic management businesses.

Whilst acknowledging the risk that AVADA Group could contribute or be directly or indirectly linked to modern slavery, we have assessed the likelihood of this risk to be low. Factors underpinning this assessment include:

- spend with our top five suppliers covers corporations who in turn maintain and report on their undertakings to assess and prevent modern slavery;
- goods and services are mostly procured from enterprises operating in, and registered within Australia and New Zealand; and
- AVADA Group undertakes a detailed and exacting desktop due diligence on suppliers and distributors as part of onboarding and annual review processes.

Criteria 4 – Actions taken to assess and address Modern Slavery risks

During the reporting period we have continued to implement the following measures:

- ensuring compliance with our Modern Slavery Policy;
- revising and updating our internal policies; and
- reviewing supplier engagement processes and principles.

Supply chain

During the 2025 financial year, AVADA Group reviewed its group operations and group supply chains to identify the risks of modern slavery practices. During the review, AVADA considered whether it may cause, contribute or be directly linked to modern slavery practices.

In determining AVADA Group's risk profile, AVADA considered the industry, geographical locations and the types of products and services it procures.

AVADA Group identified that the supplier categories of fuel, vehicles and equipment are low risk as they are unlikely to cause, contribute and/or be directly linked to modern slavery practices. Supply chains investigated to three levels included:

	Level 1	Level 2	Level 3
Fuel	Retail service station (Aust/NZ)	Oil refinery (Aust)	Crude oil (Int'l)
Vehicles	Vehicle dealer (Aust/NZ)	Vehicle manufacturer (Int'l)	Component supplier (Int'l)
Equipment	Equipment distributor (Aust/NZ)	Equipment supplier (Int'l)	Component supplier (Int'l)

Level 1 – Suppliers typically provide finished goods and services, predominantly in a retail environment.

Level 2 – Suppliers are typically manufacturers or secondary suppliers.

Level 3 – Suppliers are typically component suppliers or primary/raw material suppliers.

Products from international and their international sources may be linked to modern slavery practices.

AVADA Group will continue over the next reporting period to engage with suppliers to further understand the risks of modern slavery practices within AVADA Group's supply chain and act to reduce and mitigate those risks.

AVADA Group will investigate and where required engage external advice to undertake a further assessment of AVADA Group's supply chains processes and practices where there is concern in appropriately identifying and evaluating its modern slavery risks, particularly through international suppliers.

Internal policies

While the geographical location of AVADA Group's operations and supply chains are one effective preventative measure for modern slavery risk, any residual risk is mitigated by our suite of internal policies (summarised below) which is designed to safeguard our employees and businesses and to

actively encourage employees to raise any ethical or legal concerns. We regularly review existing policies, procedures, and working documents to ensure they address standards of professional conduct, responsible business fundamentals, including human rights and ethics.

Policy	Purpose
Modern Slavery Policy	AVADA Group's Modern Slavery Policy, first approved by the Board in December 2023 establishes our commitment to ending all forms of modern slavery.
Corporate Governance Charter	AVADA Group's framework to establish accountabilities and governance requirements through the organisation. This is reviewed annually.
Anti-corruption and Anti-bribery Policy	AVADA Group's commitment to responsible corporate governance and to conducting its business lawfully, ethically and honestly, and will not tolerate any bribery or corrupt behaviour that is intended to obtain unlawful, improper, dishonest or corrupt benefit or advantage for AVADA or its Employees.
Whistleblower Policy	AVADA Group's commitment to doing business in an open and accountable way through supporting a culture of honest and ethical behaviour. We recognise that an important aspect of this is that individuals feel confident about reporting any concerns they may have about suspicious activity or wrongdoing in relation to our business activities without fear of harm or reprisal.
Diversity Policy	AVADA Group's commitment to fostering a corporate culture that embraces Diversity and, in particular, focuses on the composition of its Board and senior management. The policy also provides a process for the Board to decide measurable objectives and procedures which the Company will implement and report against to achieve its Diversity goals.

Actions planned for FY26

In the next reporting period, AVADA Group is committed to building upon progress made in our second reporting period.

AVADA is also planning in FY26 to commence its annual review of all suppliers as well as modern slavery audits of selected suppliers who it assesses may be subject to specific modern slavery risks.

Criteria 5 – Assessing the effectiveness of our actions

We recognise that the review and assessment of our actions to identify and address modern slavery risks in our operations and across our supply chains is an ongoing and evolving process, and we are

committed to continue to build on these. To this end, we have set ourselves annual goals to reach so we can look back and assess the effectiveness of our approach and inform our path forward.

1. Supplier Engagement and Compliance

- Goal: identify and engage with our top three suppliers.
- Measurement: confirm modern slavery statement and compliance.
- Target: continued 100% supplier compliance by end June 2026.

2. Training and Awareness Programs

- Goal: ensure internal staff awareness and understanding of modern slavery issues.
- Measurement: percentage of employees who have completed modern slavery training.
- Target: maintain 100% managerial and internal staff participation in training by the end of June 2026.

3. Risk Assessment

- Goal: improve the identification and management of modern slavery risks within our supply chains.
- Measurement: number of new or identified risks mitigated, tracked.
- Target: conduct renewed risk review for 100% of critical suppliers and high-risk regions by end June 2026.

4. Reporting and Transparency

- Goal: increase transparency in reporting modern slavery risks and actions taken.
- Measurement: timeliness and completeness of reporting of annual modern slavery statements.
- Target: Publish the modern slavery statement by the set deadline (December) each year.

Criteria 6 – Consultation process

In the development of this statement AVADA consulted the companies it controls.

Criteria 7 – Other relevant information

Relevant information has been included within the above criteria as appropriate.

Criteria 8 – Approval

This Statement was approved by the Board of Directors of AVADA Group Limited on 12 December 2025.

This Statement is signed by Daniel James Crowley in his role as Director of and responsible member for AVADA Group Limited.



Daniel James Crowley
Managing Director & Chief Executive Officer