DATA ACTION MODERN SLAVERY STATEMENT

1 INTRODUCTION

This Modern Slavery Statement ("Statement") is made by Data Action Pty Ltd (collectively referred to as "DA", "we", "us" and "our") and is provided pursuant to Australia's *Modern Slavery Act (Cth) 2018* which defines modern slavery as including eight (8) types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour ("Modern Slavery").

Whilst DA does not have any reporting obligations as a commercial entity under the Modern Slavery Act and will not be making a formal submission to the Australian Border Force by way of a voluntary statement, DA has chosen to adopt a practical risk-based approach, due to our material supplier status, which will assist our clients with their obligations.

DA is not only assisting with supporting compliance for our clients, but we are proud to be doing our part in mitigating Modern Slavery risks in our business and supply chain, and are committed to conducting our business with integrity.

This Statement outlines the approach that DA is taking to detect and prevent Modern Slavery. This Statement will be reviewed and, where required, updated annually.

2 ABOUT US

DA is an Australian registered Proprietary Company, Limited by Shares, and regulated by the Australian Securities and Investments Commission. We are a specialist software and services provider to the alternative banking industry, with approximately 300 employees based across Australia.

We hold a unique position in the Australian market as one of the limited number of onshore service providers that integrates technology, people, processes, support, training, industry expertise, regulatory change and compliance, as well as third-party aggregation across clients and suppliers.

DA enhances the banking experience of more than 2.4 million Australians via its core banking and digital platforms, powering clients' customer transactions across 5.7 million accounts every day.

As a technology company, DA purchases software, hardware, services, and labour from suppliers in order to secure the sustainable success of our clients by providing innovative solutions for products and services.

3 OUR POSITION

DA is committed to operating responsibly by establishing ethical standards across our supply chain and business operations. DA is taking steps to identify and eliminate Modern Slavery.

All employees of DA have a responsibility to be a custodian of our culture and to be a role model of the DA values of; Fail Forward, Own It, No Goldfish, Cheer Loudly and Think Client. Mindfully demonstrating our values DA aims to continue developing a workplace culture that; delivers, is ethical, nurtures talent and teamwork, and drives business growth.

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DA Values



Fail Forward

Learn from mistakes and keep moving forward

Sometimes quitting will be the best option

Failure is just a dress rehearsal for success



Own It

Don't stand on the sidelines – throw yourself in

Own your work and be accountable until the end

Lead by example – listen hard and follow when it's needed



No Goldfish

Go beyond your bowl – don't swim in circles

Share knowledge, stay curious, and keep learning

Most of all, swim together as a team



Cheer Loudly

Be proud of your team's results

Let's hear the applause for every success and rockstar effort

Be that awesome workmate – don't be a brilliant jerk!



Think Client

Put yourself in our client's shoes – consider the impact for their customers and deliver

We're all part of an ecosystem; take care of each other, so we can take care of our clients

Listen, act, and communicate often

4 OUR WORKPLACE

The risk of Modern Slavery through our hiring practices for employees is low. We only hire employees that live and are permitted to work in Australia in accordance with the Fair Work Act. We conduct regular audits on Fair Pay and Visa compliance within our business, to ensure we provide fair and reasonable work conditions for our employees.

We are committed to respecting human rights in our workplace and have in place several policies – and related engagement and training plans – to promote a safe, diverse, and inclusive workplace, some of which include; Code of Conduct, Harassment, Bullying & Discrimination Policy, Employment Conditions Policy (inclusive of diversity, flexible work arrangements), Parental Leave Policy and Whistleblower Policy.

There are consequences for employees who deviate from the policies without approval as governed by DA's Code of Conduct. We have a formal risk management framework that is in place to ensure that we operate within our risk appetite.

5 OUR SUPPLY CHAIN

Due to the nature of DA's business, it has a limited supply chain, with approximately 250 suppliers, of which 98% are based in Australia. Accordingly, the risk of Modern Slavery in our business is low when compared to businesses which produce or sell physical goods.

We use the Walk Free Global Slavery Index, in assessing our supply chain against prevalence, vulnerability and government response, and continue to remain up to date with the latest reports on Modern Slavery statistics and information.

6 ADDRESSING POTENTIAL RISK

DA takes a risk-based approach in our supply chain and we review and manage the supply arrangements that are considered to pose a high risk of Modern Slavery against; industry or sector risk, business partner risk, product and services risk and geographical risk.

To identify the level of risk of our suppliers, the existing active suppliers and all future suppliers will receive a Modern Slavery questionnaire, which will be risk assessed by DA, and results placed in a low, medium, or high rating. Upon assessment of suppliers and where a potential Modern Slavery risk is highlighted, DA will work with the supplier to understand their management of the risk within

their supply chain. If the supplier continues to make an unsatisfactory declaration of compliance or which provides unsatisfactory evidence of compliance, DA will consider not entering into an agreement with the supplier, terminating or not renewing any existing agreements.

7 GOVERNANCE OF SUPPLIERS

DA's supplier onboarding process includes requests for information about measures taken by suppliers to address the risk of Modern Slavery. Where appropriate, this includes reviewing Modern Slavery statements made by suppliers and asking new suppliers to confirm that they take steps to prevent and address Modern Slavery in their business and supply chains.

DA's Vendor Management Process requires annual review of high-risk suppliers' Modern Slavery survey responses. Our contractual terms and conditions, and our purchase order terms and conditions include Modern Slavery provisions to ensure compliance with our suppliers.

8 COMMITMENT

DA will continue to embed and strengthen our approach to minimise Modern Slavery risks in our supply chain and business operations, by reviewing the effectiveness of the controls, continuing to identify any due diligence gaps, developing action items to improve controls, and implementation of relevant employee training.

This Statement is signed by Steve Favretto in the capacity of Interim Chief Executive Officer of Data Action Pty Ltd, on 31 March 2025.



Steve Favretto
Interim Chief Executive Officer
31 March 2025