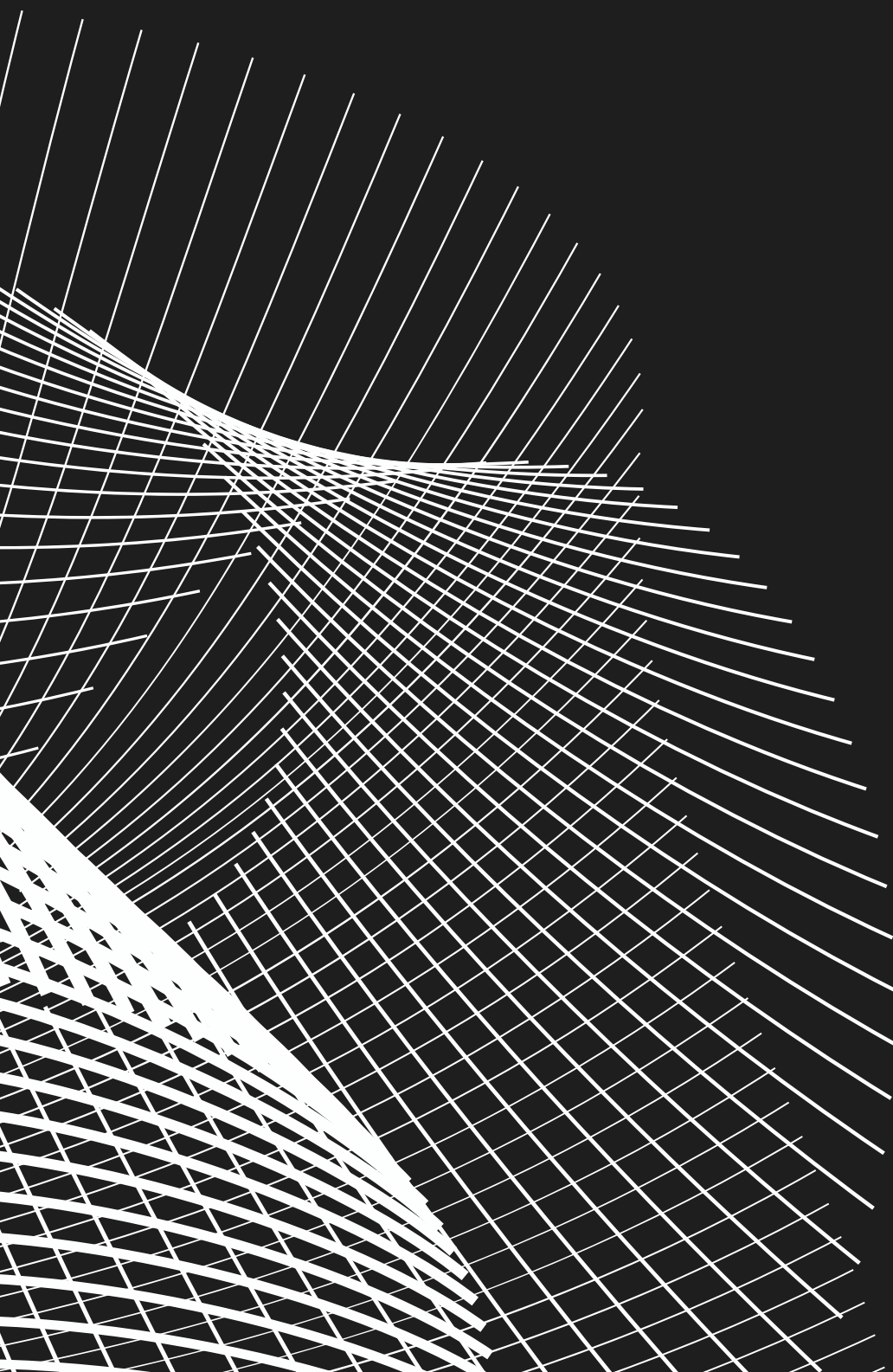


Modern Slavery Statement

Financial Year 2024 - 2025



[cdc.com](https://www.cdc.com)

Contents

1. About this Statement	04
2. Message from the CEO	05
3. Introduction and FY25 highlights	06
4. About CDC	07
5. Structure, operations and supply chain	08
Our structure	08
Our operations	09
Our supply chain	10
Key insights on CDC supply chain	11
6. Risks of modern slavery in business operations and supply chains	12
Assessment of modern slavery risks in CDC’s business operations	12
Assessment of modern slavery risks in CDC supply chains	13
Case Study: Built	14
7. Actions taken to address risks	15
Governance of modern slavery risks	15
Governance framework	15
Code of Conduct	16
Supplier Code of Conduct	17
Reporting issues and concerns	18
Supply chain due diligence and monitoring	19
8. Assessing the effectiveness of our actions	21
9. Consultation and approval	22
10. Appendix	23

Acknowledgement of Country

CDC proudly acknowledge the Traditional Owners of the lands on which we work and live, and pay respects to Elders past, present and emerging. We recognise and value the continuing rich cultures and the contribution of Aboriginal, Torres Strait Islander and Māori peoples and communities.

Dungala Dreaming

Dungala Dreaming is inspired by a traditional Yorta Yorta creation story. Baimi the Creator Spirit called out to Gane, the great rainbow Snake who was asleep beneath the earth.

Gane awoke and set off across Country, pushing the earth into deep crevices, hills and valleys as colours from his great body spread throughout the land covering trees, plants and all creatures. Baimi called out in a loud voice and thunder cracked as lightning flashed across the sky and rain fell. The rain filled the deep crevices and the river Dungala was formed.

The Artists - Bayadherra

Bayadherra is founded by proud Aboriginal Yorta Yorta brother and sister Luke and Siena Tieri. As descendants of the James Family, their cultural origins are embedded in Yorta Yorta Country; Shepparton Victoria. Luke and Siena's grandfather Glenn James OAM is a respected Elder within community and is recognised as the first Indigenous man to umpire Australian rules football in the AFL.

Original Artwork "*Dungala Dreaming*"
by Siena Tieri c.2023.



1. About this Statement

This Modern Slavery Statement (Statement) is made by CDC Group Holdings Pty Ltd and its wholly owned operating subsidiaries listed in section 5 (together, **CDC, CDC Group, us, our**) in accordance with the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**) for the reporting period 1 April 2024 to 31 March 2025 (FY25).

This Statement provides information about our business operations and our plans to identify, monitor, manage and reduce human rights and modern slavery risks in our business operations and supply chains. This Statement was approved on 3 September 2025 by the CDC Board and signed by the CEO on behalf of CDC.



2. Message from the CEO



At CDC, we believe that progress must be protected, not only through the infrastructure we build, but through the values we uphold. Our data centres power and safeguard the digital infrastructure and data that underpin national security, economic growth, and social wellbeing. But our responsibility does not end at the edge of our facilities. It extends to the people, communities, and supply chains that enable our operations.

Modern slavery has no place in our business. We are unequivocal in our commitment to identifying and addressing risks wherever they arise. This means working closely with our suppliers, investing in robust governance frameworks, and fostering a culture where doing the right thing is not optional, it is expected.

We recognise that modern slavery is a complex and evolving challenge. It can take many forms, from forced labour and human trafficking to exploitative working conditions. As a business operating in a globalised economy, we understand that vigilance is essential. That is why we have embedded modern slavery risk management into our broader Environmental, Social, and Governance (ESG) Strategy, aligning our actions with the Sustainable Development Goals.

Our approach is grounded in transparency, trust, and ethical leadership. We have strengthened our Supplier Code of Conduct, enhanced our due diligence processes, and invested in tools that improve visibility across our supply chains. We have also engaged directly with strategic suppliers to better understand their practices and support them in meeting our standards.

Importantly, we are committed to continuous improvement. We assess the effectiveness of our actions through regular reviews, stakeholder engagement, and data-driven insights. We know that real progress is built not just on policies, but on accountability and collaboration. That is why we consult widely across our teams and with external partners to ensure our efforts are informed, inclusive, and impactful. This statement reflects our ongoing journey to uphold human rights and ensure that our growth is grounded in respect, dignity, and fairness.

It is a public affirmation of our values and a call to action for all those connected to our business. Whether you are a team member, supplier, customer, or community partner, we invite you to stand with us in protecting against exploitation and promoting ethical conduct.

As the Founder and CEO of CDC, I am proud of the steps we have taken, but I am aware of the work that lies ahead. We will continue to lead with integrity, listen with humility, and act with purpose.

Protecting progress means protecting people. And at CDC, that is a responsibility we embrace fully.

A handwritten signature in black ink, appearing to read 'G. Boorer'.

Greg Boorer

Founder and Chief Executive Officer (CEO)

3. Introduction and FY25 highlights

As the leading owner, operator, and developer of highly secure, connected and sovereign data centres across Australia and New Zealand, CDC safeguards the data that underpins national progress. This deep understanding informs every aspect of our work, driving us to set new benchmarks in security and reliability as we develop and operate world-class, future-ready facilities.

Our Australian and New Zealand based assets and operations, and our supply chain partners have been developed over 18 years. From the first data centre built in 2007, CDC has built its success on its trusted and deep supplier relationships. Our structure and approach to our operations and supply chain, means our risk assessments (via Fair-Supply, our Know Your Supplier (KYS) platform provider) remain low-moderate. We hire locally with trusted employees and work with a small numbers of strategic and well-established suppliers.

However, we understand this issue is significant and managing it in line with our values requires commitment and a robust process supported by continuous improvement. This Statement outlines CDC’s approach to understanding, identifying and addressing modern slavery risks in its operations and supply chain, including CDC’s risk-based approach to managing these issues.

FY25 highlights:

01.  Performed review and major update of our Code of Conduct, including a restatement of our commitment to ESG by developing environmentally and socially responsible business practices. The new Code of Conduct was developed in FY25 and will be rolled out in FY26.	02.  Roll-out of uplifted supplier-facing contract framework, including enhanced provisions on modern slavery and supply chain risk.
03.  Established Pilot Supplier Engagement program. Targeted engagement sessions with strategic suppliers fostering greater collaboration in managing modern slavery risks across the supply chain. Program developed in FY25, with a case study included in this report to show the impact.	04.  Expanded internal contract management capabilities for enhanced interaction and management of CDC’s supplier engagements.

4. About CDC

The Critical Infrastructure for Critical Infrastructure™

Established in 2007, CDC has grown to become the pre-eminent owner-operator and developer of highly secure, connected and sovereign data centres across Australia and New Zealand. CDC provides the critical digital and data infrastructure that underpins the nation's national security, social and economic wellbeing.

We are focused on meeting the needs of government and critical infrastructure organisations and their technology partners that require world-class data centre services, including 100 percent availability, multi-redundancy, security, sovereignty, connectivity and sustainability.

Our offering is grounded in being a trusted company. Achieving and maintaining this trust relies on a robust approach across stakeholder engagement, governance, ethics and conduct, human rights, risk management, security, compliance, disclosures, and a range of other factors. We adopt best practice governance and procedures to manage safe and secure operations, make decisions, comply with the law, and meet the needs of our stakeholders. We continue to review our policies and processes to help us identify, monitor, manage and reduce human rights and modern slavery risks in our business operations and supply chains.

We continue to build greater awareness of this issue within our organisation and supply chain through training and awareness campaigns, increased engagement and collaboration with suppliers, as well as fostering a culture where speaking up is encouraged if something does not seem right.

It is with this purpose, vision and values that CDC embraces its responsibility to identify and mitigate modern slavery risks in CDC's business operations and in its supply chains.

Our approach to this topic is guided by our values and our commitment to environmental and social performance and to good governance.

Our values

Guided by our core values, CDC ensures excellence and consistency in all interactions, delivering lasting success for our customers and partners.

Tenacious.

We see and seize opportunity.

Meticulous.

We're quality obsessed - details matter.

Committed.

We form true partnerships - we're in it for the long run.

Our approach to ESG

CDC's approach to ESG is reflected in CDC's Statement of Commitment, ESG Strategy and Sustainability Reports, which are approved by CDC's Board.

Key features of CDC's ESG Statement of Commitment focus our attention on keeping our people within our operations and our supply chains safe.

This includes our commitment to:

- **Industry leadership:** Apply a robust approach to governance, health & safety, environment & nature, climate change resilience, net zero carbon emissions, and zero waste operational practices.
- **Broad collaboration, excellence and improvement:** Contribute positively to our communities and supply chain.

5. Structure, operations and supply chain

Our structure

CDC Group Holdings Pty Ltd is the ultimate parent company of CDC Data Centres Pty Ltd, which is the Australian operating entity, and CDC Data Centres NZ Limited, which is our New Zealand operating entity. All entities forming part of the CDC group of companies for the purposes of this statement are as follows:

- CDC Group Holdings Pty Ltd (parent company)
- CDC Data Centres Pty Ltd (Australian operating entity)
- Ambient HoldCo Pty Ltd
- Ambient BidCo Pty Ltd
- CDC Business Services Pty Ltd
- CDC Data Centre Holdings Pty Ltd

(referred to in the document as (CDC, CDC Group, our, us).

The CDC Group Board has ultimate responsibility for overseeing the management of human rights and modern slavery risks. The Board is supported by the Audit and Risk Committee and the Senior Leadership Team.



Our operations

CDC provide data centre solutions for public and private sector organisations headquartered domestically and internationally. CDC builds, owns and operates secure state-of-the-art data centre campuses in Sydney, Melbourne and Canberra in Australia, and in Auckland, New Zealand.

Our corporate head office is located in Canberra, ACT. We also have corporate offices in Sydney, Melbourne and Auckland. In FY25, CDC employed approximately 356 employees in Australia and New Zealand. The majority of employees are highly skilled and tertiary educated professionals and are employed on a full-time permanent basis. Our staff work across the following locations:

- **Canberra:** corporate headquarters and operational locations
- **Sydney:** corporate office and operational locations
- **Melbourne:** corporate office and operational locations
- **Brisbane, Townsville, Perth, Darwin and Adelaide:** dedicated customer support locations
- **Auckland:** New Zealand corporate offices and operational locations



Our data centre facilities and offices are owned and operated by CDC. In addition, CDC leases office premises in Sydney and Melbourne.

Our strong security posture is crucial to mitigating risks, maintaining business continuity and preserving trust with our customers and partners. As part of our approach, our employee base is primarily hired directly. In addition, all employees are required to undergo extensive and ongoing security checks, including ongoing obligations for reporting a change of circumstances as part of their employment.

Our supply chain

As a builder, owner and operator of data centre facilities, CDC partners with a trusted network of suppliers and contractors to ensure the continued operation of highly resilient infrastructure assets. This includes equipment manufacturers, engineers, designers, construction contractors, preventative maintenance service providers, information technology providers and professional service firms.

Close to 100% of CDC's spend continues to be with suppliers domiciled in lower-risk countries, predominantly Australia and New Zealand. Many of our internationally headquartered suppliers have either Australian or New Zealand based subsidiaries with whom CDC engages directly. As a result, a high percentage of our direct spend is within Australia and New Zealand only.

However, CDC recognizes that human rights risk is both present in Australia and New Zealand operations and in relation to suppliers who have expansive overseas operations, sometimes in higher risk countries, and has designed its Ethical Supply Program to identify and manage human rights risk in all countries.

The case study included in this statement is an example of how CDC engages with its suppliers with global supply chains, to ensure CDC has sufficient information to appropriately assess the risk to CDC in this context.

Key suppliers in our supply chain deliver our resilient and robust services to our customers:

Design, construction and commissioning of data centres

As CDC expands the number and location of its data centres across Australia and New Zealand, we engage a range of suppliers to support the development of these new centres, including the sourcing of infrastructure assets. A range of engineering and design consultants, contractors and equipment suppliers are engaged by CDC to support the build, fitout and commissioning process. As part of the construction activities, our construction suppliers are required to source building materials, electrical equipment as well as provide labour hire.

Data centres equipment suppliers and manufacturers

Over its 18 years, CDC has developed trusted relationships with quality data center equipment suppliers and manufactures to deliver resilient and reliable services for critical infrastructure. Quality is key and, as a result, CDC engages with a small group of high-quality suppliers in this area.

Supply of fuel for generators at data centres

CDC purchases diesel as a retail buyer to provide fuel reserves for generators to operate as backup power.

Facility management

CDC manages its data centre facilities in Australia and New Zealand with operations managers, service technicians and caretakers (including cleaning), who are permanent employees. Contractors are engaged by CDC to provide security and maintenance services. Facility management (including security, cleaning and waste removal) for leased corporate office space in Australia is provided through the respective building owners and operators.

Professional services

CDC engages a range of specialists to provide professional services, including funding and financial services, financial and quality auditing, legal, accounting and taxation advice, and other similar services. These are primarily sourced out of Australia and New Zealand.

Travel, hospitality, and accommodation

CDC procures travel, accommodation, and flights for its staff when they are required to travel for work. Work travel is predominantly within Australia and New Zealand, and occasionally Europe and North America to service customer and business requirements.

Information technology equipment

CDC procures a range of information technology equipment, such as laptops for staff and other corporate information technology hardware. We procure this equipment from suppliers and resellers based in Australia.

Key insights on CDC supply chain

CDC continues to engage specialist provider Fair Supply to provide enhanced functionality to undertake due diligence across our supply chain and provide point in time reporting to the business to more effectively manage modern slavery risks.

Detail of the approach and methodology is in section 7.

Key insights for FY25 in respect of our supply chain:

	Our top 30 suppliers represent over 85% of our spend. CDC has a network of trusted suppliers.
	Over 90% of these suppliers are assessed as low risk in our Fair Supply KYC platform.
	The remaining suppliers are assessed as moderate-low risk

CDC continues to enforce a zero-tolerance stance toward the use of forced or involuntary labour, child labour, unreasonable working hours, denial of fair wages or benefits, discrimination, harassment, denial of freedom of association or hazardous working conditions.

CDC has placed a heightened focus on its suppliers and service providers to ensure that they are appropriately managing their own exposure to modern slavery risks.

This includes the requirement to comply with CDC’s Supplier Code of Conduct, as well as to respond to information requests in this space and attend collaborative workshops focused on understanding modern slavery risk identification and mitigation strategies.

6. Risks of modern slavery in business operations and supply chains

Both CDC's Employee Code of Conduct and Supplier Code of Conduct promote robust practices focused on integrity and ethical behaviour. Shared acceptance of ethical business practices and values amongst all stakeholders is a critical component for ensuring supply chain risks are adequately identified and addressed.

CDC has adopted a risk-based approach to its supplier analysis and has identified its top suppliers in Australia and New Zealand for more detailed assessment and specific engagement.

Assessment of modern slavery risks in CDC's business operations

As with previous years, CDC has assessed the risk of modern slavery within our business operations to currently be low. This remains due to robust labour law and high standards of governance in Australia and New Zealand, where CDC's activities are centred. It is also a result of CDC's strong security posture which includes extensive and continuing security checks for its employees as part of their employment.

CDC employs staff in Australia and New Zealand and proactively comply with the comprehensive employment legal regimes in both jurisdictions. We routinely seek external support from subject matter experts to understand the evolving legal landscape in these labour markets and implement corresponding measures to protect the interests of individuals employed by, and contracted to, our business.

Our refreshed and updated Code of Conduct developed in FY25 for launched in FY26, reinforces CDC's focus on protecting the interests and well-being of individuals, whilst protecting their rights under law.

CDC's recruitment practices seek to ensure:

- all recruitment decisions are in line with the CDC values;
- recruitment and selection practices are fair and equitable;
- all recruitment process are aligned with diversity and inclusion principles.

As an employer committed to fostering and valuing diversity within our workforce, we uphold and support the human rights of all employees and job applicants. To empower our leaders in cultivating a more diverse and inclusive work environment, we have established recruitment processes designed to attract and support candidates from varied backgrounds.

CDC's direct employees are engaged to ensure compliance with all local laws as a minimum and core employment conditions such as minimum wages, hours of work, leave entitlements and superannuation.

CDC personnel undergo training on the organisation's governance policy framework, including annual Code of Conduct sessions, fostering a culture dedicated to legal compliance. Additionally, the CDC maintains an independent whistleblower hotline, enabling staff to report complaints and concerns anonymously.

Assessment of modern slavery risks in CDC supply chains

Continuing the implementation of the Modern Slavery Action Plan developed in FY23, CDC refreshed its modern slavery risk mapping which identified the key risk categories in our supply chains.

As referred to above, CDC continues to use the Fair Supply risk assessment platform to manage its risk assessment and due diligence planning. The methodology for assessment is set out in Section 7 below. We have identified the following key modern slavery risks for our supply chains, and these continue to be reviewed and updated:

Sector	Risk Assessment (Australia & New Zealand) Assessed using Fair Supply KYS platform	Key Details	Additional Notes
Equipment suppliers and manufacturers	Moderate-Low	Most suppliers are Australian owned; some are global companies; specialised goods imported from overseas	Investigation of material origin relies on heightened cooperation from suppliers (and their manufacturers).
Professional services	Low	Highly skilled, tertiary educated workforce; advisors located in Australia and New Zealand	Strong labour laws in both countries is a key factor underpinning this risk assessment.
Design, construction, fitout, maintenance of data centres	Low	Local suppliers and contractors; local workforce; some building materials sourced from overseas	There does remain a risk posed from overseas upstream suppliers using low-skilled, low-wage, potentially vulnerable workers in the development of construction materials.
Travel, hospitality, accommodation	Moderate-Low	Supply chain mostly in Australia and New Zealand	Some providers (e.g. airlines) operate complex global networks, but these are not directly related to CDC's core service offering.
Information technology equipment and services	Low	Close to 100% of suppliers based in Australia and New Zealand	Some products/components sourced rely on overseas supply chains, which carry the risk of low-skilled, low-wage labour in high-risk countries. However a large component is software products as opposed to manufacturing.
Supply of fuel	Moderate-Low	Fuel and LNG for emergency generators and vehicles; retail supply agreements in place; hydro and gas power in New Zealand	Petroleum industry has historical modern slavery risks. Conversely, this has prompted heightened due diligence in the sector, as well as the roll-out of improved governance measures in high-risk countries, including enhanced codes of conduct, stakeholder engagement, adopting workers' rights programs and frequent public reporting.

2025 Case Study

Ethical supply chain: Construction

Built

Context

As part of its ongoing commitment to ethical sourcing and continuous improvement, CDC launched a Pilot Supplier Engagement Program in FY25. The initiative was designed to strengthen CDC's approach to modern slavery risk management by fostering direct, transparent dialogue with strategic suppliers in high-risk sectors. One such engagement involved a workshop with a construction partner, Built, whose capabilities are critical to CDC's infrastructure and operations. Built is a leading Australian construction company and a key supplier in a sector identified as high risk. Given the scale and complexity of their operations, CDC recognised the importance of understanding how Built identifies and manages human rights risks across its supply chain.

Approach

The workshop moved beyond standard compliance to enable a meaningful exchange on ethical supply chain governance. Representatives from both organisations shared detailed insights into their respective programs, with a focus on practical measures to address modern slavery risks:

- **Supplier Assessments:** Both CDC and Built conduct regular hotspot analyses with specialist consultants to identify trades and suppliers with the highest risk of modern slavery, focusing on areas such as concrete, steel, electrical, and electronics.
- **Supplier Engagement & Digital Platforms:** Built utilises the Informed 365 platform to manage supplier questionnaires, assess risk, and provide a centralised platform for compliance. This enables targeted action for high-risk suppliers and supports continuous improvement through action plans and training resources.
- **Contractual Clauses & Enforcement:** Modern slavery clauses are embedded in all subcontractor agreements, providing a legal foundation for compliance and facilitating open conversations about supplier expectations.
- **Continuous Improvement:** Suppliers are required to update compliance information annually and are provided with access to training resources and action plans to support ongoing improvement. Internal modern slavery awareness training is also delivered to staff.

- **Balancing Cost Pressures:** The tension between commercial cost pressures and maintaining high standards in sustainability and modern slavery compliance was recognised. Early-stage collaboration and opportunity framing are key in achieving both ethical and commercial outcomes.
- **Social Procurement & Impact Measurement:** Both organisations track and report on social procurement spend, with a focus on engaging Indigenous, disability, and social enterprise suppliers. Impact is measured both in dollar terms and estimated social value created, with regular reporting to ensure accountability and drive continuous improvement.

CDC also shared its own journey since becoming subject to the Modern Slavery Act in 2020, including the evolution of its supplier risk framework and the integration of third-party analytics to assess slavery risks.

Outcome

This engagement validated CDC's risk-based approach to supplier governance and reinforced its commitment to Sustainable Development Goal 8: Decent Work and Economic Growth. The workshop demonstrated the value of strategic partnerships in advancing human rights protections across complex supply chains. Both organisations agreed to document and share best practices, with CDC seeking consent to include this case study in its FY25 Modern Slavery Statement. The initiative exemplifies CDC's belief that progress is best secured through collaboration, transparency, and ethical leadership.

7. Actions taken to address risks

Governance of modern slavery risks

CDC maintains a strong commitment to sound corporate governance, transparency and accountability. These principles are vital for ensuring sustained company performance and safeguarding the interests of shareholders and stakeholders.

CDC employs a comprehensive strategy to identify and address modern slavery risks within its supply chains. This includes robust governance structures, active supplier engagement, vendor management programs, assurance and risk management frameworks, as well as ongoing improvement initiatives.

As CDC continues to expand and diversify its operations, the Enterprise Risk Management Framework is being updated to better support this growth. Effective identification, management and reporting of risks - alongside risk mitigation strategies - are fundamental in recognising and addressing the potential risks related to modern slavery across the organisation.

Governance framework

Robust corporate governance is an important foundation to effective modern slavery risk identification and management. Key governance responsibilities are outlined in the table below.

Key Governance Responsibilities	
Leadership Level	Responsibilities
Board	Strategic business planning, risk governance planning and strategic oversight, setting corporate values and aligning decision making with these values.
Audit and Risk Committee	Detailed risk and governance oversight.
Senior Leadership Team	Day to day management of the business. Responsible for ensuring staff follow governance processes and frameworks, implement corporate direction and role model corporate values.

Our governance policy framework includes:

- CDC Code of Conduct
- Supplier Code of Conduct
- Supplier Engagement Policy
- Whistleblower Policy | CDC
- Fraud and Corruption Control Plan
- Environment and Social Governance (ESG) Statement of Commitment

Code of Conduct

CDC's values and our Code of Conduct set the behavioural standard for everyone who works for and behalf of CDC. It explains what we stand for and informs how we will conduct ourselves as we work together to deliver our strategy.

It helps us take a consistent, global approach to important ethical and compliance issues, including respecting human rights and preventing modern slavery. Our Code of Conduct applies to all directors, employees and contractors in the CDC Group. It is communicated to these individuals as part of the onboarding process, it is available on our intranet and website and forms the basis of our Code of Conduct annual training.

Our Code of Conduct sets out the principles governing how we do business:

- we act fairly, with due care, lawfully, in the best interests of the company and shareholders and we honour commitments to customers
- we act with honesty and integrity – we don't make or receive improper payments or benefits and always deal ethically
- we use information and property responsibly and we keep it safe and secure
- we maintain a safe and inclusive working environment where we treat each other with respect
- we seek to make positive and sustainable economic, social and environmental contributions wherever we operate
- we communicate responsibly and use technology appropriately
- we are all accountable for complying with the Code of Conduct and we call things out which don't seem right

It also outlines where to go for further help and how to raise concerns through various channels, including our whistleblowing service.

The Code of Conduct is supported by CDC Group policies. Any allegations of breaches of the Code or policies are investigated and acted upon accordingly.

In FY25 CDC performed review and major update of our Code of Conduct including a restatement of our commitment to ESG by developing environmentally and socially responsible business practices. The new Code of Conduct will be rolled out in FY26.



Supplier Code of Conduct

CDC's Supplier Code of Conduct outlines the minimum standards required of our suppliers and constitutes an integral component of our standard purchasing terms.

These standards include:

Topic	Requirement
Working Hours	Workers shall not exceed reasonable working hours per week or surpass the limits established by applicable local laws for regular and overtime work (whichever is lower).
Fair Wages and Benefits	All workers must receive at least the minimum wage as mandated by relevant local legislation and be provided all legally required benefits.
Non-Discrimination	Employment decisions regarding hiring, promotion, and compensation must be based on the individual's ability to perform their job, irrespective of gender, race, religion, age, sexual orientation, pregnancy, marital status, political affiliation, union membership, social association, ethnicity, or any other status protected by applicable laws or customary practice.
Harassment and Disciplinary Practices	Work environments must remain free from harassment, and no worker should be subjected to any form of harsh or inhumane treatment. This includes, but is not limited to, sexual harassment or abuse, corporal punishment, mental or physical coercion, or verbal abuse.
Modern Slavery and Human Rights	Suppliers shall not engage in any form of forced, bonded, compulsory labour, slavery, human trafficking, or the use of child labour.
Health and Safety	A safe and healthy workplace environment must be maintained for all workers.

CDC evaluates suppliers' compliance with these standards during procurement decisions, regardless of whether the Supplier Code of Conduct is formally incorporated into a specific contract. Additionally, contracts may set forth supplementary social, environmental and/or ethical requirements, depending on the inherent risks associated with the agreement.

Suppliers are expected to monitor both their own operations and those of their supply chains for adherence to CDC's Supplier Code of Conduct and promptly rectify any instances of non-compliance. Suppliers are also required to notify CDC if they become aware of any actual breach or potential risk of breaching the requirements of the Supplier Code of Conduct.

Reporting issues and concerns

CDC remains dedicated to fostering a culture where every individual is empowered to speak up and contribute to a safe, respectful workplace. We continue to encourage employees to raise concerns with their managers or, if preferred, through our People and Culture team.

Our CDC intranet consistently provides accessible links to policies outlining clear pathways for reporting issues related to:

- Employment conditions
- Discrimination, bullying, harassment, sexual harassment, and victimisation in the workplace
- Work-related health, safety, wellbeing, environment, and physical security

We uphold our Whistleblowing Policy and relevant legislation, ensuring ongoing protection for current and former employees, their relatives and dependents, as well as suppliers. This allows concerns regarding illegal, unethical, or improper conduct -or unsatisfactory circumstances at CDC - to be reported securely and confidently.

Our Whistleblowing Policy continues to be supported by a dedicated, independent whistleblowing service, offering anonymous reporting via phone or webform. Through these enduring measures, CDC actively maintains open channels for feedback and takes proactive steps to address issues as they arise.



Supply chain due diligence and monitoring

Over the past year, CDC has continued to build upon the strategies and objectives set out to enhance supplier engagement and strengthen our risk management framework. Formal supplier contracts remain a cornerstone, requiring adherence to modern slavery laws and the Supplier Code of Conduct, which encompasses fair work practices, equitable business dealings, and compliance with all legal requirements. Since commencing our subscription to Fair Supply in FY24, CDC has continued to leverage its advanced due diligence capabilities to identify modern slavery risks in our supply chain and provide timely, actionable reports to proactively manage modern slavery risks in both direct and indirect supply chains. Over the last twelve months, this resource has proven invaluable in increasing awareness and improving our ability to identify and mitigate risks.

Methodology used by the Fair Supply platform in assessing modern slavery risks in our Supply chain:

- CDC applied the initial risk assessment methodology to all suppliers over a materiality threshold. This baseline exercise provides the basis for our subsequent focus for ongoing due diligence and remediation activities across not only the present reporting period but for upcoming years.
- Incorporating company spend data throughout global markets, we have utilised external consultants with proprietary technology to trace the economic inputs required to produce products and services sourced from our Tier 1 suppliers to Tier 2 suppliers, Tier 2 suppliers to Tier 3 suppliers, and so on, all the way to Tier 10 suppliers by spend.
- Using the Fair Supply platform, this supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using the following sources:
 - a. The United Nations' (UN) System of National Accounts;
 - b. UN COMTRADE databases;
 - c. Eurostat databases;
 - d. The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
 - e. Numerous National Agencies including the Australian Bureau of Statistics.
- The MRIO is then examined against the following international standards:
 - a. The UN Guiding Principles on Business and Human Rights;
 - b. The Global Slavery Index;
 - c. International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
 - d. The United States' Reports on International Child Labour and Forced Labour.
- A proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier.
- This analysis was performed for the purposes of risk identification under the Act. It does not purport to confirm the actual existence (or non-existence) of slavery in our supply chains and operations. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.
- The multi-faceted approach to modern slavery risk assessment that we have undertaken has included examination and analysis of the following:
 - a. The individual suppliers and industries with the most elevated risk of modern slavery;
 - b. Supply chain plots to provide a visual representation of the supply chains for CDC's top 3 first tier industries;
 - c. Plotting the relative slavery risk in the supply chain by tier, up to tier 10;
 - d. Geographical depiction of the cumulative risk of modern slavery across the supply chain around the world; and
 - e. An overview of the classification of the first tier of our supply chain by country and industry, including relative modern slavery risk.
 - f. Suppliers in our supply chains and operations that posed any calculated risks in relation to modern slavery were identified.

Supply chain due diligence and monitoring cont.

In FY25, we are further refining our supplier governance framework, empowering our teams to make informed procurement decisions and effectively manage supplier risks. The Risk and Assurance function has played a key role in developing and maintaining a comprehensive register of supplier risks, assessing factors such as labour practices, environmental stewardship, health and safety standards, and exposure to bribery and corruption. These assessments are integrated into both supplier selection and contract renewal processes, supported by due diligence reports, the Know Your Supplier (KYS) platform, documentary reviews, and targeted audits where appropriate.

CDC remains committed to sustaining strong, collaborative relationships with suppliers, leveraging these partnerships to identify and address emerging risks. Our focus continues to be on higher-risk suppliers, conducting targeted audits and enhanced due diligence as necessary. Where heightened risk is identified, additional mitigations - including in-depth process reviews and background checks - are implemented to ensure risks are reduced to the lowest practicable level. This ongoing process enables CDC to maintain a dynamic understanding of supplier priorities and their significance to our operations.

As we move forward, our approach to supply chain management is one of continual improvement, rooted in open dialogue with suppliers regarding their obligations. This sustained commitment has fostered a culture of cooperation and heightened awareness of the importance of ethical business practices and respect for human rights, as CDC further strengthens its stance against modern slavery.

Our ESG strategy to 2030 has been endorsed by the Board and our first Sustainability Report was published in FY24.

Our sustainability function has formed an ESG Working Group to coordinate continuous improvement for environmental, social and governance initiatives. Fostering a workforce and supply chain that supports people with different backgrounds, promotes the upholding of human rights and mitigates the risks of modern slavery in our business operations and supply chains is a key pillar of our Sustainability Statement of Commitment.



8. Assessing the effectiveness of our actions, agenda for the next reporting period

CDC has evaluated its actions to address modern slavery risks within business operations. Both internal and external audits have been conducted, internal complaints reviewed, and feedback gathered through employee surveys. Actions taken to manage modern slavery risks in supply chains have also been assessed. Employee surveys have provided CDC with insights into employee satisfaction and offered an anonymous platform for feedback related to working conditions. No concerns or internal complaints regarding modern slavery were identified.

Audits were performed as part of standard assurance activities based on CDC risk assessments and compliance with standards such as information security, quality, health and safety, and environmental requirements. Internal and external audits covered ISO 9001, 14001, 45001, and 27001 standards, which include supplier management review. External audits were also completed for statutory financial reporting purposes.

CDC plans to further develop its risk management framework, with a focus on supplier engagement and monitoring by reviewing data metrics and reporting. Planned activities to reduce and mitigate modern slavery risks include:

- Enhancing supplier onboarding processes to ensure consistent assessment of supplier responses to "Know Your Supplier" questions, including those related to labour practices.
- Expanding due diligence and risk assessments using Fair Supply, a due diligence platform provider, to include more major suppliers and evaluate ESG and modern slavery risks.
- Reviewing the Supplier Code of Conduct and Supplier Governance Framework to maintain effective responses to supply chain risks, including modern slavery.
- Providing staff training for the broader leadership team to increase awareness and support identification of modern slavery risks.
- Updating the Modern Slavery Action Plan.
- Collaborating with industry organisations to support innovation and progress in industry sustainability and social governance.

9. Consultation and approval

This Statement was prepared in consultation with the CDC reporting entities owned or controlled by CDC Group Holdings Pty Ltd set out in section 5, CDC's shareholders, the CDC Senior Leadership team, the Sustainability team, the Legal team and the People and Culture team. We discussed details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

This Statement has been approved by the Board of CDC Group Holdings Pty Ltd, the CEO and Executive team.

CDC is committed to its purpose, vision and values and believes the ongoing application of the elements identified in this Statement will contribute to safer, fairer, more ethical and professional work environments.



Greg Boorer

Director, CDC Group Holdings Pty Ltd



10. Appendix

Modern Slavery Act Clause Reference	Topic	Report Section No.
16(1)(a)	Identify the reporting entity	Section 1, Page 4
16(1)(b)	Structure, operations and supply chain of reporting entity	Section 5, Page 8
16(1)(c)	Risk of modern slavery practices in operations and supply chains	Section 6, Page 12
16(1)(d)	Actions taken to address risks, inc. due diligence and remediation	Section 7, Page 15
16(1)(e)	Assessment of effectiveness of actions	Section 8, Page 21
16(1)(f)	Consultation process	Section 9, Page 22
16(1)(g)	Any other relevant information	N/A
16(2)	Details of the approval of the principal governing body	Section 1 page 4

