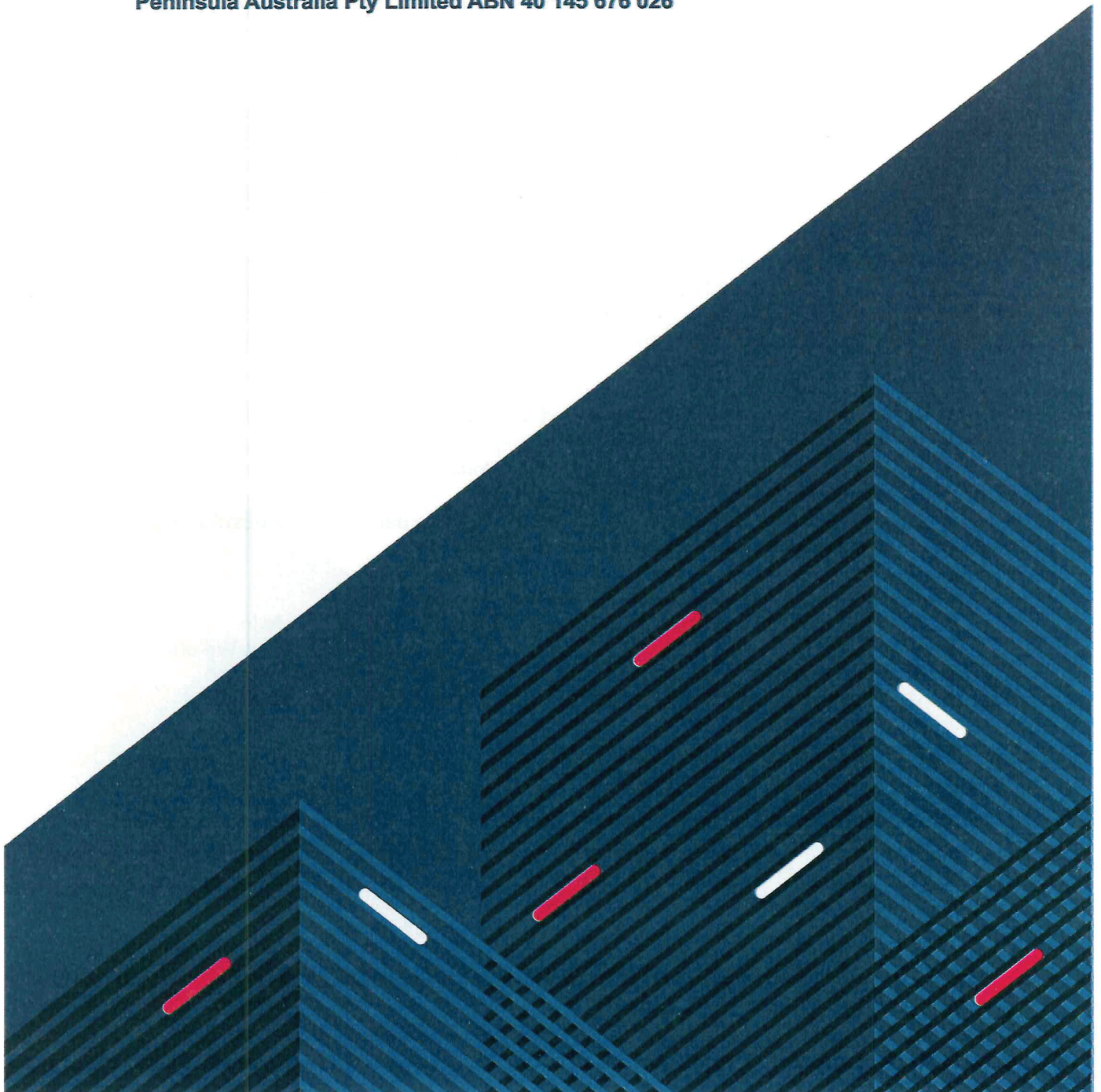




Modern Slavery Statement

1 April 2025 – 31 March 2026

Peninsula Australia Pty Limited ABN 40 145 676 026



Modern Slavery Statement

Financial year ended 31 March 2026

This statement is made pursuant to section 14 of the *Modern Slavery Act 2018 (Cth)* ("the Act") and outlines the actions taken by Peninsula Australia Pty Ltd ("Peninsula") and its subsidiaries (together, "the Peninsula Australia Group") to identify and mitigate modern slavery risks for the financial year commencing 1 April 2025 and ending 31 March 2026 (the "reporting period") to ensure that slavery, human trafficking, and child labour is not taking place in our supply chains or in any part of our business. It covers our activities for the financial year ending 31 March 2026, hereafter referred to as FY26.

This statement is prepared in accordance with and addresses the mandatory reporting criteria set out in section 16 of the Act.

Introduction

Peninsula is the ultimate holding company of the Peninsula Australia Group with registered office at Level 6, 180 Thomas Street, Sydney NSW 2000, and it is wholly owned subsidiary of Peninsula Business Services Group Limited. The ultimate parent company of the group is Rainy City Investments Limited. A listing of all reporting entities are in Appendix 1.

The Peninsula Australia Group shares the same governance framework, the same set of policies and code of conduct, shared suppliers, and has the same shared services teams in Finance, Procurement, Legal, Risk and Human Resources. Peninsula is controlled by a board of directors, which is the principal governing body that has approved this statement.

- As of 31 March 2026, Peninsula had approximately 22,795 clients in Australia.
- Peninsula directly employs approximately 548 people, all based in Australia.
- Any independent contractor engaged by Peninsula are sourced from within Australia.
- The labour used to deliver Peninsula's services is performed in Australia, the country in which those services are provided.

Our Definition and Approach to Modern Slavery

As an organisation, we recognise that businesses play an important role in respecting and promoting human rights and in eradicating modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing effective systems and controls to ensure that modern slavery and human trafficking do not take place within our operations or supply chains.

Peninsula defines modern slavery in line with section 4 of the Act, which encompasses slavery, servitude and forced or compulsory labour, human trafficking, sexual exploitation, and child labour; all conducts that constitute an offence under Division 270 or 271 of the Criminal Code or a violation of the international agreements described in section 4 of the Act. It can take many forms and is often very difficult to detect. Peninsula seeks to do all it can through the efforts outlined in

this statement to prevent, detect, and eliminate these practices in our organisation and supply chain.

Peninsula has established internal processes to support the ongoing management of modern slavery risks. These include regular review by senior management of our policies, procedures and risk management activities, to ensure we continue to strengthen our approach to preventing modern slavery in our operations and supply chains.

Operations

Peninsula is one of the leading providers of employment relations and workplace health and safety advice. Clients of Peninsula receive the additional benefit of being able to access legal services from Irwell Law. Clients also have the option to become a member of Peninsula Mutual Limited, a discretionary mutual fund that may provide protection in the event the client receives an employment relations or workplace health and safety claim.

Peninsula supports small and medium sized businesses to manage their workplace responsibilities with confidence. We provide specialised advice and services across employment relations and workplace health and safety, helping organisations navigate complex regulatory environments, reduce risk and operate effectively.

Our services enable employers to make informed decisions, maintain compliance with workplace regulatory obligations, and build productive, safe and engaged workplaces. Through our advice, resources and training, we empower businesses to resolve issues quickly and proactively manage their people and workplace challenges.

We invest in our people and technology to continuously improve the support we provide to our clients. Peninsula is part of the Peninsula Group, an international organisation with operations across multiple jurisdictions in the United Kingdom, Republic of Ireland, Northern Ireland, Scotland, Canada, and New Zealand. Our governance framework includes oversight by the Board and is supported by established policies, procedures and internal controls, as well as key corporate functions such as Risk & Compliance, Finance, Human Resources and Health and Safety.

Learn more at peninsulagrouplimited.com.au.

Supply Chains

Peninsula's supply chains support the delivery of our services to clients. Each year Peninsula Group companies spend approx. \$35 Million with external vendors on goods and services. The majority of this spend is on IT, professional services, data, and marketing.

Peninsula's supply chain are predominantly domestic and service based, and include the procurement of the following categories of goods and services:

- software and information technology services;
- computer hardware and equipment;
- marketing and advertising services;
- office supplies and consumables;
- merchandising and promotional goods;
- professional services;
- motor vehicle / car fleet suppliers;
- supermarkets and catering;
- cleaning services; and
- events, travel and hospitality.

While our direct suppliers are predominantly Australian, we recognise that some of these categories particularly hardware and electronics, promotional merchandise, and travel and hospitality may involve extended, multi-tier and overseas supply chains in which modern slavery risk is more likely to arise.

Commitment

As an organisation, Peninsula recognises that businesses of all shapes and sizes play an important role in respecting and promoting human rights and eradicating modern slavery. Peninsula is committed to tackling the challenges associated with modern slavery and collaborating with relevant stakeholders in line with our core values: *we care, we inform, we take action, we innovate, and we do the right thing.*

Accordingly, we expect all who have or seek to have a business relationship with Peninsula to comply with the Act and to act in a way that is consistent with our values. Peninsula will only partner with organisations who fully comply with this statement or those taking verifiable steps towards compliance. If this statement is breached, Peninsula will engage directly with impacted stakeholders to remedy any adverse impacts on workers, individuals, or communities.

Peninsula fulfills its responsibilities under the Act and is committed to preventing slavery and human trafficking within its own business and in its supply chains. Peninsula understands that this requires an ongoing review of both its internal practices in relation to its labour practices and our external supply chains.

Peninsula has a zero-tolerance policy towards modern slavery. We will refrain from entering into business and will discontinue any current business with any organisation that we believe may knowingly or recklessly support or involve itself in slavery, servitude and forced or compulsory labour.

The labour engaged by Peninsula to deliver its services is carried out within the country where those services are provided (i.e., Australia).

No labour utilised by Peninsula in the provision of its services is obtained through slavery or human trafficking. Peninsula strictly adheres to the minimum standards required under relevant Australian employment legislation, and in many cases, we exceed these minimum requirements. Furthermore, Peninsula ensures employees are only hired if they have verified, valid work rights (e.g., citizens, permanent residents, or visa holders with work entitlements).

Peninsula complies with its statutory reporting obligations by submitting its annual Modern Slavery Statement to the online Modern Slavery Statements Register and website to ensure complete visibility and transparency.

Our Standards and Policies

Peninsula has standards and policies in place which combat the risk of modern slavery.

Our employees are:

- offered Peninsula employment contracts on a guaranteed hours basis.
- within Peninsula (both part-time and fixed-term) are provided with the same pro-rata contractual entitlements as full-time and permanent employees;
- offered a competitive remuneration package alongside a wide variety of benefits. We regularly conduct staff surveys to give employees a voice on their individual employment, their department and the broader organisation;
- able to access a robust Whistleblowing Protection Policy that is in place which encourages the reporting of any wrongdoing which is in the public interest;
- provided with a confidential helpline where any concerns can be reported anonymously 24 hours. Any instances of whistleblowing are reviewed by our Head of Compliance & Risk. If serious, a triage committee assesses the report, agrees on the next steps, and decides on reporting lines. The committee is also responsible for ensuring that all whistleblowing policies are adhered to in relation to the whistle-blower. Where a supplier is involved, the Peninsula business owning the relationship has responsibility for ensuring the supplier responds to any violations and undertakes any recommended actions.

Our suppliers:

- are obligated under our contractual terms and conditions to maintain acceptable controls and standards in respect of their employees and their rights and freedoms, and replicate these in any contract with subcontractors that they may use to deliver services to us;
- must comply with our supplier code of conduct which sets out our expectations of suppliers. It separates these expectations into obligations our suppliers must fulfil and best practices that they should seek to comply with;

- furthermore, our An Ethical Sourcing Policy exists which is explicitly establishes with regard to Peninsula having an expectation of a zero-tolerance approach to modern slavery within its supply chains.

Modern Slavery Risks

Consistent with the Act, we have considered the risks of modern slavery practices both in our own operations and in our supply chains. We distinguish between the modern slavery risk that Peninsula directly causes, contributes to, or is directly linked to through our business relationships.

Risks in our operations

We assess the risk of modern slavery within our own operations to be low. Our workforce is directly employed in Australia, is engaged under written contracts, and is covered by Australian employment law, including the *Fair Work Act 2009* (Cth) and applicable modern awards. We verify that employees hold valid work rights (for example, as citizens or under a visa that permits work) before they commence employment.

Risks in our supply chains

We consider the residual risk of modern slavery in our supply chains to be low overall, given their predominantly domestic and service-based nature. However, we acknowledge that risk is not eliminated. Categories with comparatively higher inherent risk include:

- computer hardware and electronics, which commonly rely on global manufacturing and raw-material supply chains;
- merchandising and promotional goods, including textiles and printed products;
- events, travel and hospitality services, including cleaning, catering and accommodation; and
- any outsourced facilities, cleaning or labour-hire arrangements at our premises.

Modern slavery risks are most likely to arise within the broader supply chains supporting these goods and services, particularly where multiple suppliers, subcontractors and offshore operations are involved.

Actions Taken to Assess and Address Risks

During the reporting period, Peninsula maintained a zero tolerance approach to modern slavery and took the following actions to assess and address modern slavery risks in its operations and supply chains.

Governance and policies

- Ethical Sourcing Policy — sets out Peninsula's expectation of a zero-tolerance approach to modern slavery within its supply chains and the standards expected of suppliers;
- Whistleblower Protection Policy — encourages officers, employees and others to report any unlawful activity, including concerns relating to modern slavery, and protects those who do so;

- Oversight — Peninsula's Director of Legal Services is responsible for receiving and reviewing modern slavery concerns and for the ongoing review of Peninsula's obligations under the Act;
- All relevant policies and documentation are made available and accessible to staff.

Responsible employment practices

- We confirm work rights for all employees before engagement and adhere to (and in many cases exceed) the minimum standards required under Australian employment legislation;
- We generally offer employment contracts on a guaranteed-hours basis.
- Part-time and fixed-term employees receive the same pro-rata contractual entitlements as full-time and permanent employees;
- We offer a competitive remuneration package and conduct staff surveys that give employees a voice on their employment, their department and Peninsula.

Supplier due diligence - Ongoing

- Competitive Requests for Proposal (RFPs) led by Procurement include an Ethical Sourcing Questionnaire containing a section on modern slavery;
- Procurement has developed an ethical sourcing self-attestation statement and requires new and renewing suppliers to complete an ethical sourcing self-attestation, confirming their ongoing compliance with applicable modern slavery legislation;
- Peninsula maintains a supplier list, including supplier contact details, to support engagement and follow up where required;
- Where appropriate, Peninsula conducts assessments of third-party providers to gain comfort that they do not engage in modern slavery and will only do business with organisations that comply with this statement or are taking verifiable steps towards compliance.

Assessing the Effectiveness of Our Actions

We assess the effectiveness of our actions to combat modern slavery through the following measures:

1. The Director of Legal Services & Director of Finance undertakes ongoing review of Peninsula's obligations and actions under the Act across the organisation and its supply chains;
2. Peninsula maintains an accurate, up to date supplier list, including contact details; we confirm the supplier list was up to date for the reporting period;
3. Peninsula tracks whether any reports of modern slavery have been received in respect of its operations or suppliers. During the reporting period, there were no reports that any of Peninsula's suppliers were involved in activities covered by the Act;
4. Complaints made under the Whistleblower Protection Policy are responded to in accordance with that policy, and we monitor that swift, appropriate and proportionate action is taken in response to any reports. During the reporting period, there were no reports of complaints made under the Whistleblower Protection Policy.

5. We confirm that relevant policies and documentation remain readily available and accessible to all staff, and that additional training is provided to staff where required.

In future reporting periods, Peninsula intends to continue to develop the indicators it uses to measure effectiveness.

Supplier Due Diligence – FY26

In FY26, Peninsula continued to strengthen supplier due diligence through Procurement-led screening, ethical sourcing self - attestations and targeted review of suppliers. These activities focused on improving visibility across our supply chain, confirming supplier awareness of modern slavery obligations, and identifying any areas requiring further engagement. No modern slavery concerns were identified through these due diligence activities during the reporting period.

Training

Peninsula makes modern slavery-related policies and documentation available to staff and provides additional training to relevant staff where required.

Summary of Activities for the Financial Year Ended 31 March 2026

There have been no instances of modern slavery identified within our business operations or supply chains against the 11 International Labour Organisation (ILO) indicators during this financial year.

Over the past year, we have strengthened our approach to modern slavery through the following key activities:

- **Supplier Due Diligence:** We conducted targeted due diligence assessments with key suppliers across high risk procurement categories to better understand their supply chains, evaluate potential modern slavery risks, and review their mitigation strategies.
- **Industry Alignment:** We continue to actively monitor best-practice frameworks within our sector to ensure our risk management strategies remain robust and compliant with Australian standards.
- **Operational Reviews:** We maintained strict internal audits of our Australian labour practices, ensuring full compliance with employment legislation, valid work rights verification, and fair contractual entitlements for all employees.

Proposed Actions for the Next Financial Year Ending 31 March 2027

1. **Embed Supplier Learnings:** Implement the insights and data gathered from the supply chain due diligence undertaken in FY26 to refine our procurement onboarding processes.
2. **Targeted Workforce Training:** Deliver updated awareness training to key personnel involved in procurement, HR, and supply chain management to ensure ongoing vigilance against modern slavery indicators.

Consultation

In preparing this statement, the relevant functions within Peninsula including Compliance & Risk, Legal, Procurement and People / Human Resources were engaged to confirm the structure, operations, supply chains, risks and actions described above. Peninsula also engages with the wider Peninsula group of companies, of which it is a part, on its approach to modern slavery.

This statement is approved by the Peninsula Australia Group Board and signed on its behalf by:



David Price
Chief Executive Officer
Peninsula Australia Pty Limited

Date: 13.08.28

Appendix 1. Reporting entities

1. Peninsula Australia Pty Ltd ABN 40 145 676 026
2. Peninsula Group NZ Limited (trading as Peninsula Group NZ / Employsure
New Zealand NZBN 9429042175179)
3. Irwell Law Pty Ltd ABN 91 614 311 885



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1 April 2025 – 31 March 2026

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