

## DEPUTY - MODERN SLAVERY STATEMENT 2025

### About this statement

This modern slavery statement ("**Statement**") covers the activities of Deputy Group Pty Ltd (ACN 608 535 093) ("**Deputy Group**"), Deputy Group's wholly-owned subsidiary Deputec Pty Ltd (ACN 133 632 327) ("**Deputec**") and Deputec's wholly-owned subsidiary Deputy EMEA Limited ("**Deputy EMEA**") (together, "**Deputy**", "**we**", "**us**" or "**our**") for the financial year ending 30 June 2025 ("**Reporting Period**"). This Statement has been produced in accordance with Australia's Modern Slavery Act (2018) and the United Kingdom's Modern Slavery Act (2015).

Deputy has prepared a joint statement covering the entities listed above because we operate using group-wide policies and procedures to assess and manage modern slavery risks. For clarity, each of Deputy Group, Deputec and Deputy EMEA are reporting entities under this Statement.

This Statement outlines the actions of Deputy to address modern slavery risks in our operations and supply chain. It applies to and describes the steps taken by Deputy to seek to minimise the risks of modern slavery occurring in Deputy's operations and supply chains.

### About Deputy

Deputy is the complete people platform purpose-built for shift-based businesses. Trusted by over 1.5 million workers and 380,000 workplaces in more than 100 countries, Deputy combines AI-powered scheduling, compliance automation, payroll, mobile communication, and workforce insights to help businesses run smarter, stay compliant, and drive performance.

### Deputy's culture and values

We're on a mission to improve the world of work for everyone everywhere, one shift at a time - creating thriving workplaces in every community. This starts with us. Deputy is a values and purpose-driven organisation. We listen to learn, clock in for our customers, believe we're stronger together, lead with integrity, and own our shift.

### Deputy's structure, operations and supply chain

**Structure** Deputy Group is an Australian private company established in Sydney, Australia. Deputy Group wholly-owns Deputec (Deputy's Australian operating entity), which in turn wholly-owns Deputy EMEA (Deputy's UK operating entity). Each of the reporting entities have the same

governance structure as, and follow the same policies as set and directed by, Deputy Group.

- Operations** Deputy is a SaaS provider with over 500 highly skilled professional workers made up of predominantly permanent employees primarily located in our core jurisdictions of Australia, the United States, and the United Kingdom in addition to contracted service providers who provide employer of record, customer support and engineering development services using personnel based in India, the Philippines and Vietnam, respectively.
- Supply chain** Deputy's supply chain is primarily located in Australia and the United States with the majority of supplier spend in technology (i.e. other SaaS providers that support the delivery of Deputy's services to our customers), professional services (e.g. external legal, accounting, tax, audit, security and recruitment fees), marketing (e.g. marketing agency fees, event hosting and association memberships) and facilities (office rent, repairs and maintenance, cleaning and utilities). Only a small proportion of Deputy's supplier spend is put towards office supplies, office catering and staff merchandise.

### Modern slavery risks

As an online provider of workforce management services whose own workforce predominantly consists of professionally qualified and/or highly skilled employees and independent contractors engaged through formal written contracts and overseen by experienced human resources professionals, the risk of modern slavery in *our operations* has been assessed as low.

While we acknowledge that some of the countries in which Deputy engages suppliers are higher risk from a modern slavery perspective, i.e., India, the Philippines and Vietnam, since Deputy is an online services provider whose supply chain consists primarily of other technology products and services that support the delivery of our platform to our customers and comprises responsibly sourced providers subject to rigorous internal vendor review by Deputy, the risks of modern slavery in *our supply chain* have also been assessed as low.

However, we recognise that all major organisations have a risk of modern slavery - even if that risk lies in non-strategic sourcing categories or further down the supply chain. We also recognise the risk that our customers may engage in modern slavery practices and have, despite having a low degree of control over our customers' use of our services, sought to

mitigate this risk by prohibiting illegal or unlawful uses of our services in our acceptable use policy (which has contractual force).

### **Controls and actions to address risks of modern slavery**

Deputy has implemented the following controls and actions to assess and address modern slavery risks in our operations and supply chain:

- **Processes.** Deputy has a modern slavery risk assessment (“**Risk Assessment**”) in its procurement process. Suppliers deemed as ‘medium’ or ‘high’ risk based on the results of the Risk Assessment are required to complete a modern slavery supplier questionnaire (“**Questionnaire**”). The results of the Questionnaire help inform Deputy of any modern slavery risks in the supplier’s operations and supply chains and appropriate steps to mitigate such risks.
- **Policies.** A modern slavery policy is included in Deputy’s employee handbook, which must be acknowledged and accepted by all Deputy employees during onboarding and annually thereafter. In addition, a public supplier code of conduct with obligations in respect of modern slavery compliance is on Deputy’s website and will be incorporated by reference in Deputy’s agreements with ‘medium’ or ‘high’ risk suppliers at their next respective renewals.
- **Whistleblowing.** Deputy has a formal whistleblowing procedure, known as the “Speak Up Hotline”, which is an internet and telephone-based platform operated by an independent third-party, EQS. The Speak Up Hotline allows Deputy employees and other listed individuals to confidentially and anonymously make disclosures of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct involving Deputy’s business, without fear of retaliation. The scope of Deputy’s whistleblower policy and procedure includes any suspected modern slavery concerns.
- **Contractual controls.** A suite of contractual clauses and controls has been created for inclusion in our agreements with ‘medium’ or ‘high’ risk suppliers that aim to manage modern slavery risks in our supply chain.

**Training and awareness.** We have compiled a list of team members who are actively involved in Deputy’s procurement process and released annual modern slavery training to such team members. The training assists applicable team members in identifying and managing modern slavery risks.

### **Effectiveness of controls and actions**

Deputy assesses the effectiveness of its modern slavery risk management controls and actions through a combination of performance metrics, qualitative feedback, and annual internal audits. Our goal is to measure not only the implementation of our controls but also

their tangible impact on risk mitigation. Our assessment for the Reporting Period is as follows:

- **Supplier due diligence.** The effectiveness of our supplier due diligence is assessed by tracking response rates to our Supplier Questionnaire and by having our legal, compliance and security teams review the substance of the responses. For this Reporting Period, while all 'medium' and 'high' risk suppliers responded to our Supplier Questionnaire and no instances of modern slavery were identified, we plan to develop a framework to score the quality of responses in the next reporting period to better identify areas needing follow-up.
- **Contractual controls.** Our primary control for ensuring supplier accountability is the inclusion of modern slavery clauses in our contracts with 'medium' or 'high' risk suppliers. During this Reporting Period, our focus has been on the development and planned rollout of these clauses at the next respective contract renewals for these suppliers. As this control is in its early stages of implementation, we have not yet developed a mechanism to formally assess its effectiveness. For the next reporting period, we plan to establish a baseline by tracking the uptake of these clauses in all relevant renewed contracts.
- **Training and Awareness.** We ensure that team members involved in procurement receive specific training on modern slavery risks. Our current method for assessing this action is tracking the completion rate of the training, which was 100% for all applicable team members in this Reporting Period. We recognise that while completion rates are a crucial first step, a fuller assessment of effectiveness involves measuring comprehension and impact. As a key improvement for the next reporting period, we will consider introducing post-training surveys or incorporating comprehension questions into the relevant training module to assess understanding of the material and better gauge the effectiveness of the training itself.
- **Whistleblowing.** We assess the effectiveness of our Speak Up Hotline not only by tracking the number of reports (no disclosures of suspected modern slavery concerns were received by Deputy during the Reporting Period) but also by promoting awareness and trust in the system. We remind all of our employees of the hotline's purpose and its confidential, independent nature and also assess its accessibility by ensuring it is referenced in our employee handbook that must be acknowledged annually.

## **Consultation and approval**

This Statement is made pursuant to Australia's Modern Slavery Act 2018 (Cth) and the United Kingdom's Modern Slavery Act (2015). This Statement was developed through consultation with relevant stakeholders within Deputy (including Deputy's legal, compliance, finance, procurement and senior leadership teams) and prepared by Deputy's legal team.

This Statement was approved by our board of directors and signed on its behalf by Silvija Martincevic, as at 1 October 2025.

A handwritten signature in black ink, appearing to read 'Silvija Martincevic', written in a cursive style.

Silvija Martincevic  
Chief Executive Officer and Director