



Modern Slavery Statement 2024-25

Preamble

ReadyTech (ASX:RDY) exists to help communities thrive. We recognize modern slavery as a significant global issue that demands sustained attention and action. We are fully committed to preventing acts of modern slavery and human trafficking from occurring within our business and supply chains, and we expect the same high standards and commitment from all our contractors, suppliers, and business partners.

This Modern Slavery statement ("Statement") covers the reporting entity, ReadyTech Holdings Limited, and each of its wholly owned or controlled entities (see below on page 2 of this Statement) for the reporting period 1 July 2024 to 30 June 2025 ("Reporting Period"). This Statement is made in accordance with the Modern Slavery Act 2018 (Cth) ("Act"), reflecting ReadyTech's continued commitment to addressing modern slavery risks as the company continues to grow, with revenue reaching \$121.8 million during the Reporting Period. This Statement contains ReadyTech's risk assessment of its operations and supply chains and actions taken to identify and mitigate risks of modern slavery within its operations and supply chains.

The Statement has been reviewed and approved by the Board of ReadyTech Holdings Limited.

Who We Are (our structure, operations, and supply chain)

Structure

ReadyTech (ASX:RDY) was incorporated in Australia. ReadyTech has been listed on the Australian Stock Exchange since 2019. This Statement represents our Modern Slavery Statement as a Group to assess and address the risks of modern slavery in our business operations and supply chain.

Reporting entity	: ReadyTech Holdings Limited
ABN	: 25 632 137 216
Registered Office	: Level 2, 77 King Street, Sydney, NSW 2000
Industry	: Information Technology and telecommunications.



RDY controlled the following entities during the Reporting Period:

Name	Principle place of business/Country of incorporation
ReadyTech HoldCo Pty Ltd	Australia
ReadyTech EWP Pty Ltd	Australia
Esher House Pty Ltd	Australia
VETtrak Pty Ltd	Australia
Lirac HoldCo Pty Ltd	Australia
Lirac Bidco Pty Ltd	Australia
Ready Pay Services Pty Ltd	Australia
ReadyTech Workforce Solutions Pty Ltd	Australia
eLearning Australia Pty Ltd	Australia
Wagelink Australia Pty Ltd	Australia
Readytech Limited	New Zealand
Zambion Pty Ltd	Australia
Pentagon HoldCo Pty Ltd	Australia
Pentagon BidCo Pty Ltd	Australia
REadytech Gov Solutions Pty Ltd	Australia
McGirr Holdings Pty Ltd	Australia
McGirr Information Technology Pty Ltd	Australia
McGirr Information Technology UK Ltd	United Kingdom
McGirr Technologies, Inc	United States of America
ReadyTech Procurement Solutions Pty Ltd	Australia
Avaxa Pty Ltd	Australia
Capital Software Limited	New Zealand



PhoenixATS Australia Pty Ltd	Australia
IT Vision Australia Pty Ltd	Australia
IT Vision Software Pty Ltd	Australia
Readytech Pty Ltd	Australia
Ready Payroll	Australia
Cognology Pty Ltd	Australia
Cogware Pty Ltd	Australia
Councilwise Pty Ltd	Australia
House of Cog Pty Ltd	Australia
Silverband Pty Ltd	Australia

Operations

The principal activities of ReadyTech are to provide technology-based solutions to its customers in the education, government, justice, and workforce management sectors. These solutions are organised into the following three main segments:

Segment	Main Product	Description
Education and Work Pathways	JR Plus, Paradigm and AVAXA Ready LMS	JR Plus, Paradigm, AVAXA and Ready LMS are ReadyTech's student management system empowering enterprise tertiary educators to create digital student experiences while adhering to strict compliance standards.
	VETtrak, including VETtrak Cloud	VETtrak is a student management system for Registered Training Organisations (RTOs).
	Ready Skills	Ready Skills provides vocational skills tracking, recognition, planning and assessment technology.



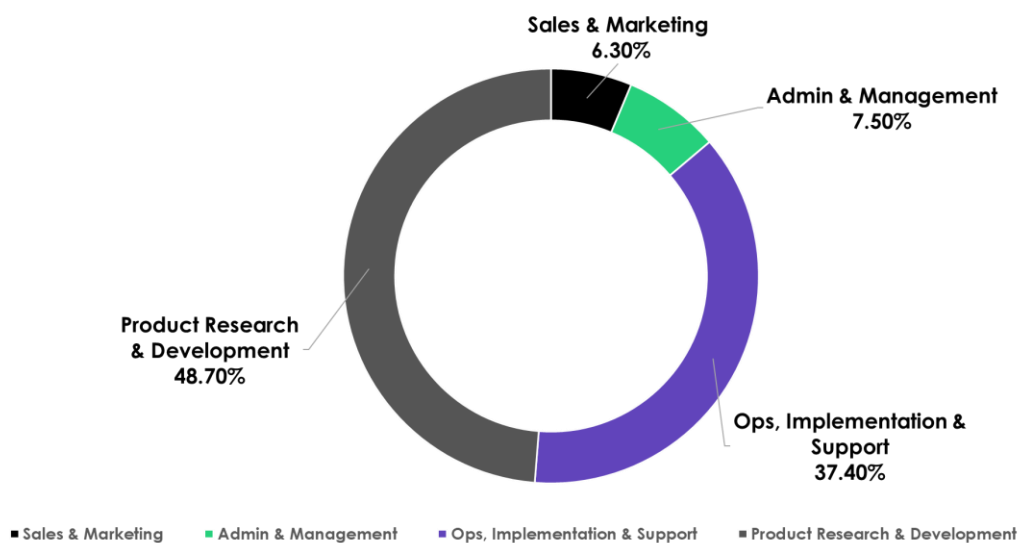
Segment	Main Product	Description
	Job Ready, Ready Recruit and Job Apprentice	Job Ready, Ready Recruit and Job Apprentice help employment services providers, Group Training Organisations (GTOs) and Australian Apprenticeship Support Network (AASN) support the completion of apprenticeship lifecycle and deliver work opportunities for jobseekers and customers.
	Esher House	Esher House delivers behavioural assessment technology and intervention programs for Back to Work, apprentices and more.
Workforce Solutions	Ready Workforce	Ready Workforce is an all-in-one cloud payroll, HR, rostering, time & attendance and leave management software platform.
	Ready Employ	Ready Employ by Phoenix is a cloud-based talent management system to manage online processes.
	Ready Pay	Ready Pay provides people management software, combined with an end-to-end payroll outsourcing service, with local payroll experts providing customers with payroll, HR administration and workplace health & safety software and services.
Government and Justice	Ready Community (powered by Open Office and CouncilWise)	Ready Community (powered by Open Office and CouncilWise) provides high function, integrated, statutory and compliance management systems for local government.
	Ready Case	Ready Case (formerly case HQ, part of McGirr Technologies) is the market leader in case management systems for courts, tribunals, and related justice sector agencies.



Ready Contracts and Ready Buy	Ready Contracts and Ready Buy are designed as procurement software suites to support distributed goods and services procurement and commercial operations efficiently, cost effectively, and at reduced risk, while reducing workload on centralised procurement.
Altus (powered by IT Vision)	Altus is a comprehensive enterprise resource planning (ERP) platform designed specifically for local governments.
Synergysoft (powered by IT Vision)	SynergySoft is a legacy product suite used by local governments, which can be fully integrated with Altus solutions.

During the Reporting Period, our operations were conducted through various locations with offices in Australia (Sydney, Melbourne, Perth, Adelaide), New Zealand and the United Kingdom. We engaged 500++ people globally, which included employees and contractors engaged through third-party or outsourcing arrangements. The proportion of employees which perform our business functions is depicted below.

% of people roles by function





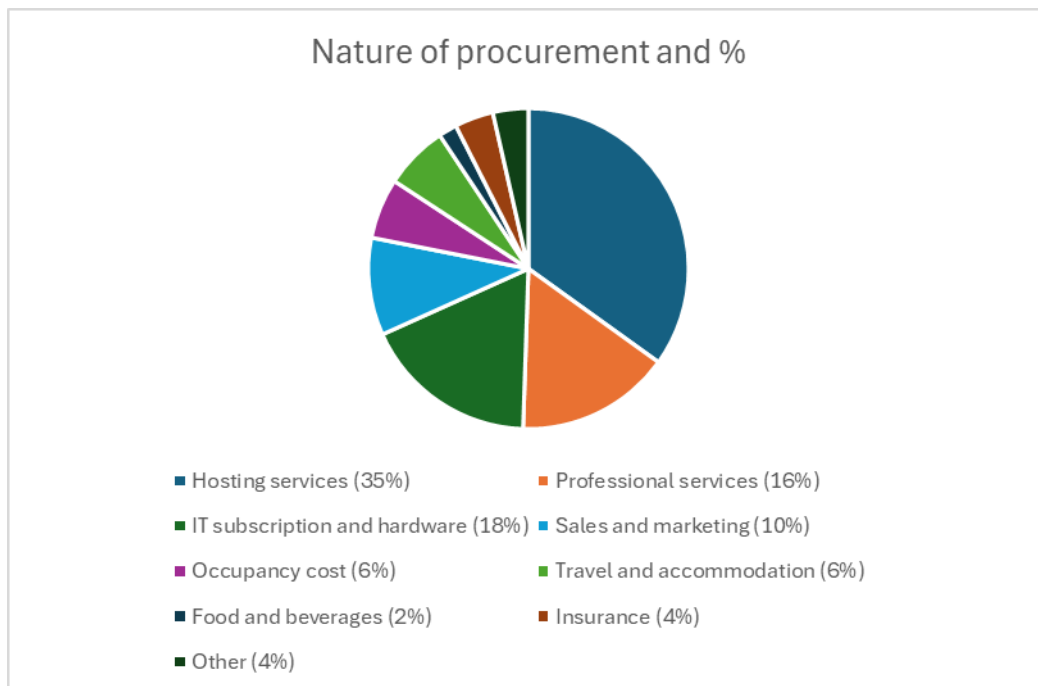
During the Reporting Period, 85% of our workforce was contracted directly by ReadyTech in Australia and New Zealand. The remaining portion of our workforce was engaged either directly or through third-party recruitment to perform contracting roles overseas in jurisdictions including India, Indonesia, the Philippines, Vietnam, and Romania.

Supply Chain

We have mapped our supply chain with the initial focus on our main procurement categories by spend.

ReadyTech directly engaged around 700 suppliers during the Reporting Period. Most of our suppliers were located in countries with a low prevalence of modern slavery (Australia, New Zealand, and United Kingdom). Our main supplier spend categories during the Reporting Period are depicted below:

% of procurement by nature





Our largest category of supplier spend was hosting services which along with the purchase of IT subscriptions and hardware, represents about 53% of our total procurement. These categories include the provision of software, hardware, hosting and cloud platform services, computer systems and peripheral devices, telecommunications, and network technology services. The second largest category is professional services providing audit, accounting, legal, consultancy, insurance, and company secretarial services. These professionals are mainly located in Australia and New Zealand. We have a mix of short- and long-term relationships with our suppliers.

Risk Assessment of Modern Slavery Practices

We have conducted an assessment of the risks of modern slavery which may be present in our operations and supply chain. Our analysis considered several risk factors including:

- sectors and industries in which we operate;
- nature of the products and services procured by RDY; and
- geographical location of our subsidiaries, suppliers, and contractors.

Risks within our operations

We operate primarily across the professional services industry and predominantly in Australia and New Zealand, which are countries with a low prevalence of modern slavery.

As a technology business, our largest and most crucial resource is our workforce, which includes employees and contractors. Given the robust Australian and New Zealand workplace regulations with which ReadyTech fully complies, including the Fair Work Act 2009, Work Health and Safety Act 2011, the Australia Superannuation Guarantee Act and laws against discrimination, bullying, and harassment, NZ Employment Relations Act 2000, NZ Health and Safety at Work Act 2015 and NZ Human Rights Act 1993, and ReadyTech's systems for ensuring compliance, we consider that the risk of modern slavery occurring in our Australian and New Zealand operations is low. Further, the level of skills and expertise of our workforce is high to meet the business requirements. The vast majority of our employees and contractors are highly skilled professionals with qualifications, knowledge, and competencies related to their role. Given the educational and skills-based thresholds required for employment in these roles, we consider there is a lower potential for exploitation of these workers and therefore lower risks of modern slavery. Within ReadyTech there are also clear avenues (internal and external) to raise any concerns employees might have about the terms and conditions of their employment or contract.



Although we consider there is a low risk of modern slavery in the majority of our workforce, we acknowledge that arrangements with contractors located in the Asia Pacific region (e.g., Vietnam, India, Indonesia, Philippines) and Romania may pose higher risks of modern slavery given the geopolitical and other circumstances prevalent within these markets. A number of these jurisdictions have experienced poor governance and labour protections and as a result, higher rates of modern slavery. These jurisdictions also experience lower levels of transparency and accountability by various governments on employment standards and contracting arrangements. Workers and contractors in Australia and New Zealand have clearly enjoyed higher levels of protection.

Supplier Risk Assessment Criteria

We continued to focus on suppliers with a contract value above \$1 million, evaluating their modern slavery risks as high, medium, or low based on the following criteria:

- The types of products and services provided to ReadyTech.
- The supplier's location or, where known, the locations from which they sourced goods and services for ReadyTech.
- Whether the supplier had an anti-modern slavery policy or other modern slavery risk management processes in place.

Definition of High-Risk Suppliers

High-risk suppliers are those procuring raw materials or services from high-risk locations without anti-modern slavery measures. During this reporting period, no suppliers were identified as high-risk for modern slavery.

IT Hardware Procurement Risks

Our business model does not involve direct procurement of raw materials. However, our highest exposure to modern slavery risks continues to be through the procurement of IT hardware. This stems from the use of components such as tin, tantalum, tungsten, and gold—materials associated with regions and industries that carry a higher risk of modern slavery.

Mitigation Measures in IT Procurement

Our IT hardware procurement is centrally managed by our IT support division.

- **Large Suppliers:** The majority of our hardware is sourced from large multinational companies, such as Apple and Hewlett Packard, which are subject to conflict and forced labour mineral regulations.
- **Local Retailers:** A smaller proportion of IT hardware and peripherals is purchased from local retailers, such as JB Hi-Fi. While our visibility into their supply chains is limited, we consider these risks medium to low due to the reputable nature of these companies and their established modern slavery processes.



Professional Services Engagement

Risks associated with our engagements with professional services providers remain low. These providers are predominantly located in Australia and New Zealand—countries with a low prevalence of modern slavery. Additionally, we work exclusively with reputable, creditworthy providers that maintain modern slavery policies.

Actions to Assess and Address the Risks

This Statement marks ReadyTech's third reporting on modern slavery risks, demonstrating our ongoing commitment to enhancing processes and controls to address risks of directly or indirectly engaging in modern slavery practices. During the Reporting Period, we had the following controls in place to address modern slavery risks:

Operations

Australia and New Zealand

ReadyTech continues to ensure compliance with employment laws by benchmarking and market-testing salaries to ensure all contractual arrangements exceed the legislated minimum wage in Australia and New Zealand.

1. Strategic Consolidation of Offshore Engineering Resources:

To directly address the heightened modern slavery risks associated with our contractor engagements in Vietnam, India, Indonesia, Philippines, and Romania, ReadyTech commenced a strategic consolidation project during the Reporting Period targeting our offshore Engineering and Quality Assurance teams. Upon review of our fragmented vendor landscape of more than 11 suppliers, we initiated a comprehensive assessment of multinational companies to identify and select a single Tier 1 vendor partner with established operations, mature governance frameworks, and demonstrated capability in managing modern slavery risks including robust compliance with international labour standards, transparent supply chain practices, established modern slavery policies and monitoring



mechanisms, and a proven track record in adhering to multinational regulatory and human rights requirements. This consolidation project is currently in progress, with completion expected in the next reporting period. Once fully implemented, concentrating our offshore resources with a single, carefully vetted partner will significantly enhance ReadyTech's ability to conduct meaningful due diligence, verify working conditions through site visits, and ensure consistent application of our security and People and Culture policies across all offshore contractor arrangements.

2. Annual Salary Benchmarking:

ReadyTech conducted its annual salary benchmarking process, utilizing industry data provided by an external party. For newly acquired businesses, this process also ensured alignment with both internal pay structures and external market benchmarks, maintaining fairness and competitiveness.

Our People and Culture Team routinely assess whether an employee is subject to any industrial awards and conducts a comprehensive review of the salaries and conditions of award-covered employees to ensure compliance with minimum award standards. Approximately 28.10% of our employees are covered by the Clerks Private Sector Award 2020, the Professional Employees Award 2020, and the Miscellaneous Award 2020. Any employee identified as being at risk of not meeting minimum award conditions is flagged, prompting action such as increased salary adjustments and/or a review of working conditions.

For non-award employees, we conduct bi-annual salary benchmarking using external industry data. Any significant pay disparities between our employees and the market trigger a review, with findings communicated to the relevant Chief Executive for action. These matters are closely monitored by ReadyTech's Chief Executive and are reported to the Board's Nomination and Remuneration Committee.

3. Employee Engagement Survey:

ReadyTech conducted an employee engagement survey, which included elements linked to reward and recognition. Feedback from this survey is being monitored and used to inform decisions about ongoing improvements to reward frameworks.



4. Review of Independent Contractors:

ReadyTech employs a small team in United Kingdom where we engage an outsourced payroll service to provide advice on employment requirements (e.g., minimum wage, standard working conditions) to ensure our compliance with local regulations.

For contractors located outside Australia and New Zealand, ReadyTech continues to verify the minimum wage in each respective country of engagement. While independent contractors do not receive employee entitlements, we are actively reviewing their pay arrangements against the minimum wages in relevant local markets to ensure they are paid fairly.

Policies

Modern Slavery policy

Prior to the Reporting Period, RDY developed a Modern Slavery Policy to reflect our commitment to respect and promote human rights and effectively manage issues relating to modern slavery and human rights. The policy applies to people in our business, including directors, all employees, and officers of RDY and its controlled entities and contractors and consultants to ReadyTech.

The policy is published on the ReadyTech website -

https://www.readytech.com.au/assets/RDY_Modern-Slavery-Policy_12-May-2022.pdf

ReadyTech also has complementary internal policies that support our modern slavery and human rights initiatives:

- Risk management policy
- Health and safety policies
- ☞ Corporate social responsibility policies
- ☞ Code of Conduct



Effectiveness of measures to address modern slavery risks

During the Reporting Period, we have enhanced our approach through initiatives including the strategic consolidation of offshore vendor arrangements, ongoing salary benchmarking and compliance reviews, and continued mapping of our supply chain. These actions have improved our ability to identify and address potential risks in areas of higher exposure. The initiatives implemented have contributed to improved risk visibility and management:

- Our salary benchmarking and compliance review processes have maintained alignment with employment standards in Australia and New Zealand, with mechanisms in place to identify and address any remuneration concerns.
- The ongoing strategic consolidation of offshore vendor arrangements has positioned us to enhance monitoring and oversight in jurisdictions with higher modern slavery risks
- Ongoing supply chain mapping activities have provided greater understanding of our supplier base and associated risk profiles

ReadyTech will continue to strengthen our effectiveness assessment approach through:

- Further development of supplier due diligence processes, particularly for high-value relationships
- Ongoing education and capability development to ensure our teams remain alert to modern slavery risks

ReadyTech views modern slavery risk management as a long-term commitment that requires continuous attention and improvement. We remain committed to continuous improvement in both our modern slavery measures and our ability to evaluate their effectiveness in future reporting periods.



Consultation and Approval

All entities controlled by ReadyTech operate under a common governance framework. Controlled entities have a standardised way of working and the same processes for identifying, assessing, and responding to modern slavery risks in ReadyTech operations and supply chains. ReadyTech executive management oversees all controlled entities allowing for consistent application across ReadyTech's modern slavery framework and in reporting against key outcomes in this Statement, in accordance with the Act.

The Board of Directors of ReadyTech Holdings Limited approved this Statement, on behalf of the reporting entity and its controlled entities, as the principal governing body of the reporting entity.

Marc Washbourne

CEO, ReadyTech