



Joint Modern Slavery Statement

NCSI (Australia) Pty Limited
NCS AU Pty Ltd

Effective date: 24/06/2026

make
change
happen



Modern Slavery Statement

01 April 2025 – 31 March 2026

Joint Modern Slavery Statement

**NCSI (Australia) Pty Limited,
NCS AU Pty Ltd, and owned and
controlled entities
(NCSI Australia Group)**



A message from NCSI Australia Group's Country Lead and Director

At NCSI Australia Group, our purpose is to advance communities through partnerships to harness technology. We do this by bringing people together to make the extraordinary happen. We value teamwork, as we know it's only when we come together that we can achieve extraordinary things.

To fulfil our purpose, we live and breathe our beliefs: Adventure; Excellence; Integrity; Ownership; and Unity. Underpinning our beliefs is our passion for unlocking client value through technology. Our commitment to quality, to people and to challenging traditional thinking supports us to advise, transform and manage technology to help our clients and communities.

NCSI Australia Group has a zero-tolerance approach to all forms of modern slavery within our business operations and supply chain. In this Modern Slavery Statement, we reflect our ongoing efforts to promote transparency, accountability, and continuous improvement in how we identify, mitigate, and respond to modern slavery risks.

NCSI Australia Group cultivates an environment grounded in integrity and accountability, which is critical for addressing modern slavery. We remain committed to managing and mitigating modern slavery risks.

We welcome your feedback on this Modern Slavery Statement. Please share your comments or questions with us via grc@au.ncs.co.

Signed by:

A handwritten signature in black ink that reads 'Anthony Micheal Bailey'.

7BE81AA246A7473...

Anthony Micheal Bailey

NCSI (Australia) Pty Limited - Country Lead and Director



Contents

1. Introduction and Purpose..... 4

2. Reporting Entity 4

3. Structure, Operations and Supply Chain 4

4. Risks of Modern Slavery Practices 6

5. Actions Taken To Assess and Address Modern Slavery Risks..... 8

6. Assessing the Effectiveness of Our Actions 10

7. Our Consultation Process 11



1. Introduction and Purpose

This Modern Slavery Statement (Statement) has been prepared in accordance with sections 14 and 16 of the Modern Slavery Act 2018 (Cth) (Act) for the reporting period 1 April 2025 to 31 March 2026 (2026 or reporting period).

Modern slavery is the severe exploitation of a person for personal or commercial gain by another party. It refers to practices including forced labour, child labour, debt bondage, slavery and slavery-like practices, and extends to instances involving force, coercion, deception or abuse of power. In practice, modern slavery can occur where a person is forced to work without pay to settle debts or is forced to work through intimidation and violence.

This joint Statement sets out the actions taken by NCSI Australia Group's reporting entities and their owned and controlled entities to assess and address the risks of modern slavery in our business operations and supply chain.

2. Reporting Entity

This Statement is provided by the following two reporting entities:

NCSI (Australia) Pty Limited (**NCSI Australia**) (ABN 38 089 983 317). A technology business focusing on IT and end-to end digital solutions.

NCS AU Pty Ltd (**NCS AU**) (ABN 78 626 006 111). A technology services firm providing end-to-end IT solutions, including AI-led enterprise applications, digital experience design, cloud migration, cybersecurity, and data analytics.

The registered office for both entities is Level 4, 10 Shelley Street, Sydney NSW 2000.

Within this Statement, these entities are referred to collectively as **the reporting entities**.

All references to "our", "us", "we" and "reporting entities" refer to the entities listed above.

"**NCSI Australia Group**" refers to the reporting entities and their owned and controlled entities.

3. Structure, Operations and Supply Chain

Our structure

NCSI Australia Pty Limited (**NCSI Australia**) is a wholly owned subsidiary of NCS Pte Ltd (**NCS**), which in turn is a wholly owned subsidiary of Singapore Telecommunications Limited (Singtel Group). NCSI Australia is the Australian holding company of the NCSI Australia



Group's owned and controlled entities all of which are technology services companies that include consulting, application development and managed application services:

- NCS AU Pty Ltd (ABN 78 626 006 111)
- Dialog Pty Ltd (ABN 16 010 089 175):
- Eighty20 Solutions Pty Ltd (ABN 23 618 019 355)
- Riley Solutions Pty Ltd (ABN 79 144 694 977)

NCS AU Pty Ltd (**NCS AU**), and its owned and controlled entity is the operating and contracting entity that engages directly with our customers and suppliers.

The NCSI Australia Group also includes various owned and controlled entities that have no trade activity and as such, do not have operations, procurement functions, or employees. These entities are not represented in the Group structure (Figure 1) and actions taken to address modern slavery risk described within this Statement are not applicable to these entities.

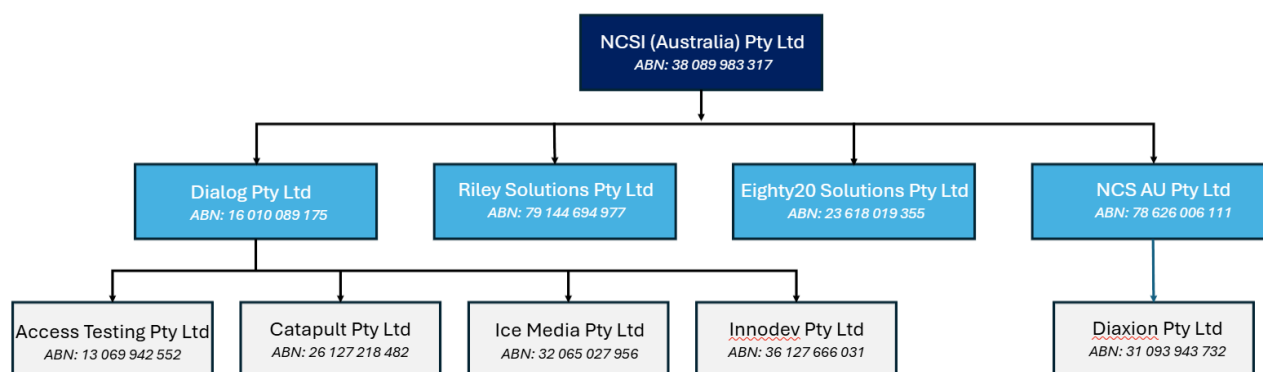


Figure 1. NCSI Australia Group's simplified organisational structure

Our operations

NCSI Australia has a workforce of approximately 10 employees, primarily full-time and part-time. Together, the team support NCSI Australia to meet clients' increasing demand for AI and digital transformation and in providing end-to-end technology solutions.

NCS AU employs approximately 1,000 full-time and part-time information technology specialists. Together, the team support NCS AU to deliver innovative technology solutions to clients across all industries and meet clients' increasing demand for AI and digital transformation and in providing end-to-end technology solutions.

Both NCSI Australia and NCS AU operate nationally and have offices located in Sydney, Melbourne, Adelaide, Brisbane, Canberra, Darwin, and Perth.

These entities are each governed by a Board of Directors and they, and the owned and controlled entities within the NCSI Australia Group, share common policies and processes. As such, the modern slavery risks and actions described in this Statement are applicable to the entities within the NCSI Australia Group identified within this Statement.

Our supply chain

In 2026, the reporting entities sourced goods and services from a range of suppliers with whom we have a direct contractual or purchasing arrangement. The goods and services we purchased included:

- IT software and hardware;
- Network support for our data and call centres, and digital platforms;
- Professional services;
- Facilities management, including security, catering, cleaning, office maintenance and other business-related services.

Our suppliers are in Australia, the United States of America, Singapore, Philippines, India, and Vietnam. Of these suppliers, approx. 90% were based in Australia, which accounted for 95% of our total procurement spend (AU\$255,746,203). We acknowledge that some of our Australian-based suppliers may source their goods and services from overseas.



Figure 2. Location of NCSI Australia Group's operations and tier-1 supply chain

4. Risks of Modern Slavery Practices

NCSI Australia Group acknowledges that modern slavery can occur in any industry and geography. We are committed to identifying, assessing, and mitigating the risk of slavery in our operations and across the supply chain. As part of the Singtel Group, we adhere to the obligations and expectations outlined in the [Human Rights Statement](#), which includes requirements related to labour rights, broader human rights, and a zero-tolerance approach to modern slavery.

Aligned with the UN Guiding Principles on Business and Human Rights (UNGPs), we recognise the complexities of modern slavery and the varied ways that businesses can be involved. We understand how the UNGPs help to determine business' level of involvement in actual or potential human rights impacts, such as modern slavery, based on a cause, contribute, or directly linked framework.



We have assessed the risk of modern slavery within our direct workforce to be low as our employees are primarily based in Australia and governed by the same policies. We are committed to compliance with local labour laws and have implemented systems to monitor and ensure compliance with these requirements.

To identify areas of potential modern slavery exposure, we consider a range of known risk factors relevant to our operations and supply chain, including supplier geography, category of spend, and workforce vulnerability.

The importance and repetition of a structured, risk-based assessment approach and view over multi-tier supply chains is well noted. These elements are still being developed within our current processes to further enhance our detective controls.

We are actively engaging with relevant internal stakeholders to strengthen that approach to identifying and assessing modern slavery risks, with a view to progressively implementing a more formalised framework in future reporting periods.

Taking a risk-based approach, we have identified that we, and our owned and controlled subsidiaries, may be susceptible to modern slavery risks in the following areas listed below:

IT hardware

Technology-related hardware supports the majority of our business operations and infrastructure. There is a potential risk of contributing to, or being directly linked to, modern slavery practices such as forced labour, debt bondage, and deceptive recruitment in our procurement of these products where there are complex, multi-tiered global supply chains or parts and components that are sourced from offshore suppliers in higher risk jurisdictions.

NCSI Australia Group does not manufacture IT products from raw materials as part of its operations. However, we understand that the technology industry has an elevated risk of modern slavery due to the extraction and processing of raw materials such as tin, tantalum, tungsten, and gold that are commonly used in the manufacture of electronic devices.

Call centres (offshore operations)

We utilise data centre support located in India and Philippines as part of our operations. There is a potential risk of contributing to, or being directly linked to, modern slavery practices such as debt bonded labour and forced labour in our procurement of these services. This is particularly relevant where there is poor visibility of the arrangements between the workers and the provider, and where arrangements involve lower-skilled workers, such as migrant workers, who may be more vulnerable to modern slavery practices.

Facilities management

We engage with a number of suppliers to support our day-to-day operations. These services include security, catering, cleaning, and general office maintenance. There is a potential risk of contributing to, or being directly linked to, modern slavery practices such



as forced labour, debt bondage, and deceptive recruitment, where workers come from vulnerable populations within and outside Australia, and perform base-skilled tasks. This risk is elevated where there is limited visibility of how these workers are managed and where work is performed outside business hours.

5. Actions Taken To Assess and Address Modern Slavery Risks

Governance

Modern slavery is linked to trade through regulations and policies that ban the import of forced labour goods and require businesses to report on supply chain risks. As part of the Singtel Group, we follow its [Trade Compliance Policy](#) that outlines the commitment to comply with all applicable sanctions and export control laws and regulations in the jurisdictions in which the Group operates. This includes undertaking a range of due diligence checks, which are essential for identifying and managing trade compliance risks. This document is regularly reviewed to ensure that it remains relevant.

Other internal policies that are implemented at the Singtel Group level, and as such are applicable to the NCSI Australia Group, that support our modern slavery and broader human rights risk management include:

- Singtel Group Human Rights Statement: This provides an overview of our risk-based approach to identifying and addressing modern slavery and broader human rights impacts across our operations and supply chains, the standards we set for ourselves, and the expectations we have of others linked to our operations, products and services.
- Supplier Code of Conduct: This outlines the requirements for suppliers to establish and maintain appropriate management systems, and the expectation we have of them to be proactive in monitoring these management processes. This includes expectations related to business ethics, modern slavery, workplace health and safety, and grievance mechanisms.
- Recruitment and Labour Hire Policy: This establishes fair and transparent recruitment practices and requires all employment arrangements—whether direct or through labour hire agencies—comply with applicable employment and human rights standards.
- Whistleblower Policy: This establishes procedures for addressing suspected and actual unethical behaviour, including how to make a report and how those reports are handled confidentially.

We maintain a governance and accountability framework that supports our modern slavery risk management activities. This includes:



- **Board oversight:** The NCSI Australia Board approves the annual Modern Slavery Statement on behalf of the reporting entities. Updates are provided at least biannually on the progress of modern slavery risk management actions and the preparation of the Statement.
- **Executive accountability:** The NCSI Australia and NCS AU Country Lead holds overall accountability for modern slavery risk management and reporting.
- **Cross-functional management:** The Modern Slavery Working Group comprises representatives from Procurement, Legal, Risk & Compliance, People & Culture, Operations, and Sustainability who collaborate to manage modern slavery risks across the business and prepare the annual Modern Slavery Statement.

Supply chain risk management

NCSI Australia Group implements a centralised due diligence process that focuses on three main areas:

1. Verifying third party identities, and any related entities, against sanctions lists;
2. Undertaking end user and end use assessments of our products or services to identify unauthorised applications;
3. Ensuring compliance with necessary licenses where our product or services are controlled items.

All new suppliers undergo mandatory screenings for adverse news, including reports on modern slavery convictions or human rights violations.

Our due diligence process for subcontractors, suppliers and vendors enables us to adopt a proactive approach to managing compliance risks associated with our engagement with third parties. We also have standard contractual terms that require our suppliers to comply with all applicable laws and to have systems in place to manage the risks of modern slavery. This includes the ability to audit suppliers for breaches of contract for remediation purposes and a requirement to comply with the [Singtel Group Supplier Code of Conduct](#).

In 2026, we focused our actions on enhancing our supplier due diligence practices, including reviewing and strengthening supplier onboarding processes to incorporate risk identification, including indicators for modern slavery and ethical sourcing.

Grievance and remediation

Our grievance and incident management procedures enable timely investigation and resolution of concerns raised by employees or third parties, including any allegations related to modern slavery.

We maintain an internal incident reporting process that is aligned with Singtel Group's Whistleblower Policy and includes a comprehensive framework for identifying and addressing concerns such as those related to modern slavery. Concerns can be raised



confidentially, including via our independent whistleblower hotline operated by an external service provider, and reports are actively investigated.

Where there is a modern slavery related non-compliance by a supplier, our standard contractual terms provide opportunities for engagement and remediation, including grounds for termination in the event the non-compliance cannot be rectified.

During the FY2026 reporting period, we launched our Anti-Bribery and Corruption (ABC) portal. This portal enables NCS AU to centralise access to ABC policies, guidelines, and declaration processes, and to reinforce our zero-tolerance stance on bribery and corruption. It supports consistent compliance across the organisation and promotes transparency through accessible reporting channels, including declaration forms and the whistleblower hotline channels.

Training

Our Modern Slavery Awareness training is part of our mandatory Compliance Curriculum. All of our people are required to complete the training module annually. The module provides context and detail related to the risks of modern slavery and how these are applicable to NCSI Australia Group, as well as how to report suspected instances of modern slavery.

This training module is reviewed on an annual basis and in 2026 amendments relating to Procurement Hub details, supply chain due diligence requirements, high-risk sectors and geographic exposure were implemented to ensure ongoing relevance and alignment with current regulatory and operational risk areas. This revised training will be rolled out in the 2027 Compliance Curriculum, targeting July 2026.

6. Assessing the Effectiveness of Our Actions

We are committed to continuously improving our approach to modern slavery. We have implemented a range of activities to help us assess the effectiveness of our actions. These include:

- Actively tracking and managing completion of the Modern Slavery Awareness training as part of our mandatory Compliance Curriculum.
- Tracking the investigation of modern slavery-related reports that are raised via our internal processes or the independent whistleblower hotline.
- Undertaking audits of suppliers where we identify any instances of non-compliance relating to modern slavery.
- Conducting internal audits as required to assess the effectiveness of controls and processes related to modern slavery risk



No reports of actual or suspected modern slavery were received via our grievance mechanisms in 2026.

Our current due diligence processes include screening for general compliance and reputational risks. No instances of supplier non-compliance relating to modern slavery were identified during the reporting period.

Formal supplier audits specifically focused on modern slavery have not been undertaken to date. No triggers have occurred that would explicitly require one. We recognise this as an area for further development and intend to progressively enhance our risk-based supplier oversight framework in future reporting periods.

7. Our Consultation Process

The reporting entities were engaged in the preparation of this Statement in consultation with the entities we own or control. Input was also sought from various key internal stakeholders across the NCSI Australia Group, including Legal, Procurement, People and Culture, and GRC (Governance, Risk and Compliance) teams.

This Statement has been approved by the board of NCSI (Australia) Pty Limited, as the principal governing body, on behalf of itself and the second reporting entity covered by the statement, NCS AU Pty Ltd. This Statement is signed by a responsible member of NCSI (Australia) Pty Limited:

Signed by:

7BE81AA246A7473.....

Anthony Micheal Bailey

NCSI (Australia) Pty Limited - Country Lead and Director

Date: 24 June 2026