

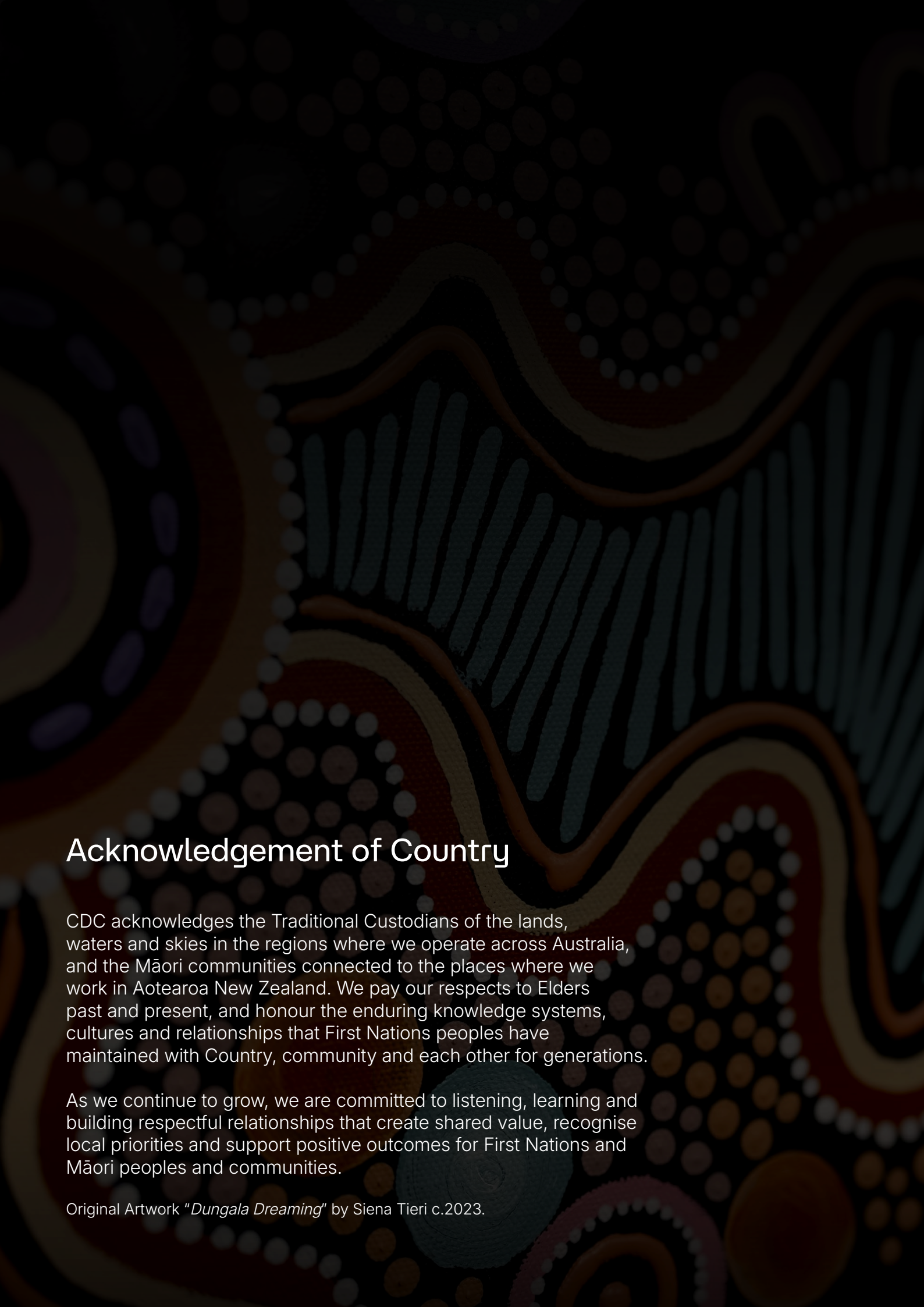


Modern Slavery Statement

Financial Year 2026

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Acknowledgement of Country

CDC acknowledges the Traditional Custodians of the lands, waters and skies in the regions where we operate across Australia, and the Māori communities connected to the places where we work in Aotearoa New Zealand. We pay our respects to Elders past and present, and honour the enduring knowledge systems, cultures and relationships that First Nations peoples have maintained with Country, community and each other for generations.

As we continue to grow, we are committed to listening, learning and building respectful relationships that create shared value, recognise local priorities and support positive outcomes for First Nations and Māori peoples and communities.

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 (ABN 67 612 332 073) (**CDCGHPL**) and its wholly owned operating subsidiaries listed in Section 5 (together, **CDC, CDC Group, we, us or our**) in accordance with the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**) for the reporting period 1 April 2025 to 31 March 2026 (FY26). Although all data reported in this Statement relates to FY26, in certain cases which are clearly marked, the Statement includes commentary relating to items continuing to progress after the end of FY26 and up to the date of this Statement.

CDC is an Australian-owned data centre developer, owner and operator with operations in Australia and New Zealand. This Statement covers the CDC Group and describes the structure, operations and supply chains of CDC, the modern slavery risks that may exist within our operations and supply chains, and the actions we take to identify, assess, manage and mitigate those risks.

This Statement outlines our approach to respecting human rights, strengthening responsible business practices and supporting effective governance across our operations and supply chains.

CDC is monitoring proposed changes to Australia's modern slavery regulatory framework and as greater clarity emerges on likely introduction and scope, CDC will continue to review and refine our approach as required. This includes assessing whether further enhancements may be required across our governance, due diligence, supplier engagement, remediation and reporting practices.

The Statement was approved by the Board of CDCGHPL on 10 September 2026 and signed by the Chief Executive Officer on behalf of CDC.



2. Message from the CEO



Protecting critical infrastructure requires trusted relationships. The same is true when it comes to protecting people.

Modern slavery has no place in CDC's business or supply chain. That expectation applies to everyone in our teams and those we work with, regardless of where work is being performed or products are being sourced.

The environment we operate in continues to change. Supply chains have become more complex, customer expectations continue to increase and governments around the world are placing greater scrutiny on where products come from and how workers are treated. At the same time, infrastructure businesses like CDC depend on specialist suppliers, manufacturers, contractors and service providers operating across multiple countries and markets.

In my view, these evolving circumstances make strong supplier relationships more important than ever.

CDC has always preferred long-term partnerships. Many of our key supplier relationships have been built over years. Those relationships help us maintain visibility across our supply chain, have honest conversations about emerging risks and work together to improve outcomes where required. You do not develop that understanding through contracts alone.

During FY26, growth in CDC's supplier base and procurement activity provided additional insights into modern slavery risks across our supply chain. These insights reinforced the importance of maintaining strong supplier relationships, taking a risk-based approach and continuing to strengthen our due diligence processes.

Our commitment was reflected in a range of initiatives during FY26. We continued targeted supplier engagement, enhanced due diligence and invested in capability across the business. We expanded our use of Fair Supply insights to help prioritise risk-based engagement, commenced targeted training for key personnel and took practical steps to strengthen procurement processes so that modern slavery considerations are better embedded in supplier onboarding, review and decision-making. CDC also intends to make modern slavery awareness training available to all employees in the current financial year, supporting a broader understanding of how modern slavery risks may arise and how concerns can be escalated.

We also continued to improve the governance that supports this work. That includes risk management processes, supplier expectations and contractual requirements which help ensure modern slavery considerations remain part of day-to-day decision making.

We recognise that this work is never finished. Supply chains continue to evolve and expectations continue to change. Our focus remains on understanding our risks, maintaining visibility across our supply chain and working constructively with suppliers to address potential issues before they become problems.

At CDC, we believe responsible business starts with accountability. We will continue to ask questions, engage directly with suppliers, strengthen our processes and look for opportunities to improve.

Greg Boorer
Founder and Chief Executive Officer

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

3. Introduction and FY26 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.

Our Australian and New Zealand operations and supply chain partnerships have been developed over almost two decades, supported by long-standing relationships with trusted suppliers and a strong commitment to ethical business practices.

CDC’s assessment indicates that its overall modern slavery risk profile remained broadly consistent with previous reporting periods. Most of our direct spend remained concentrated with established suppliers operating in Australia and New Zealand, while CDC recognises that modern slavery risks may still arise within complex global supply chains.

In FY26, CDC assessed a larger number of suppliers, compared with FY25, reflecting growth in its business and accompanying growth in supplier base and procurement activity.

Higher expenditure will typically result in a greater amount of modern slavery risk exposure. However, modelling used by CDC revealed that exposure per million dollars of expenditure remained broadly consistent with FY25, indicating no material change in CDC’s overall risk exposure profile despite increased supplier expenditure.

CDC also strengthened governance, due diligence, supplier engagement and procurement processes during the reporting period.

FY26 highlights:

	Modern slavery risk assessment capability uplift and training	Commenced targeted modern slavery risk and due diligence training for key personnel, strengthening internal capability to identify modern slavery risks, apply risk-based decision-making and support effective supplier oversight.
	Enhanced supplier due diligence through the governance framework	Applied enhanced modern slavery due diligence where risk indicators supported closer review, including document review, supplier engagement and escalation through CDC’s supplier governance processes.
	Strengthened supplier engagement and collaboration	Continued active engagement with strategic suppliers to improve transparency, share learnings and build awareness of modern slavery risks and expectations across the supply chain. Continued collaborative engagement with Schneider Electric to better understand modern slavery governance and risk management practices within complex global supply chain, demonstrating the value of strategic supplier partnerships in strengthening transparency, due diligence and continuous improvement across shared supply chains.
	Procurement process improvements	Improved internal procurement processes which will support more consistent consideration of modern slavery risk in supplier onboarding, supplier review, contract renewal and risk-based escalation. These enhancements support CDC’s ability to identify higher-risk suppliers and apply proportionate due diligence before, and during, supplier engagements.
	CDC Code of Conduct and policy and process improvements	Implemented a refreshed CDC Code of Conduct and reviewed whistleblower policies and processes, including enhancements relevant to modern slavery risk management, some of which are slated for implementation during FY27.

4. About CDC

The Critical Infrastructure for Critical Infrastructure™

Established in 2007, CDC is a leading owner, operator and developer of sovereign, highly secure and connected data centres across Australia and New Zealand. We are the Critical Infrastructure for Critical Infrastructure™ that underpins national security, economic resilience and social wellbeing.

CDC provides critical digital infrastructure for customers including government agencies, critical infrastructure operators and technology partners. Together with our customers, suppliers and broader stakeholders, we help ensure communities have access to the digital systems and services that support modern life.

Our business is built on trust. That trust is earned through the way we operate, the relationships we build and the standards we set for ourselves and those we work with. Our approach to modern slavery is guided by our values and our commitment to being a trusted company that creates long-term value for customers, communities, suppliers, employees and shareholders alike.



We recognise that the best outcomes for CDC, for communities where we operate and others in our value chain are achieved through collaboration and a commitment to long-term trusted relationships. To build these relationships we focus on listening to and working closely with customers, suppliers, contractors, industry partners, governments, investors and local communities.

Our values

Guided by our core values, CDC strives to create positive and lasting outcomes for our customers, partners, suppliers, communities and each other.

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 environmental, social and governance (ESG) matters is guided by Board-approved ESG commitments, strategy and sustainability reporting. These frameworks support how we identify, manage and respond to risks and opportunities across our operations and supply chains.

Protecting people and promoting responsible business practices are central to CDC's ESG approach. Our ESG Strategy is built around three pillars: **Stable Planet, Thriving People and Trusted Company**, which together support our commitment to respecting human rights, ethical conduct and addressing modern slavery risks.

CDC's ESG commitments are underpinned by three principles:

Industry leadership: Maintaining strong governance and responsible business practices across our operations and supply chain.

Broad collaboration: Working with employees, suppliers, customers and communities to strengthen sustainability and human rights outcomes.

Excellence and improvement: Driving continuous improvement through capability building, transparent reporting and ongoing performance review.

These principles support CDC's efforts to identify, assess and address modern slavery risks and strengthen responsible supply chain practices.

5. Structure, operations and supply chain

CDC Group Holdings PTY Ltd is the parent company of the CDC Group and includes two primary operating subsidiaries: CDC Data Centres Pty Ltd, the Australian operating entity, and CDC Data Centres NZ Limited, the New Zealand operating entity.

During FY26, CDC undertook a corporate reorganisation to support scaling and financing flexibility across the CDC Group, including the establishment of special purpose vehicles for land purchasing and development activities. The reorganisation did not result in any material change to CDC's operations, workforce, supply chains, governance framework or modern slavery risk profile. Accordingly, the policies, processes and controls described in this Statement continued to apply across the CDC Group and the matters described in this Statement remained materially unchanged as a result of the reorganisation.

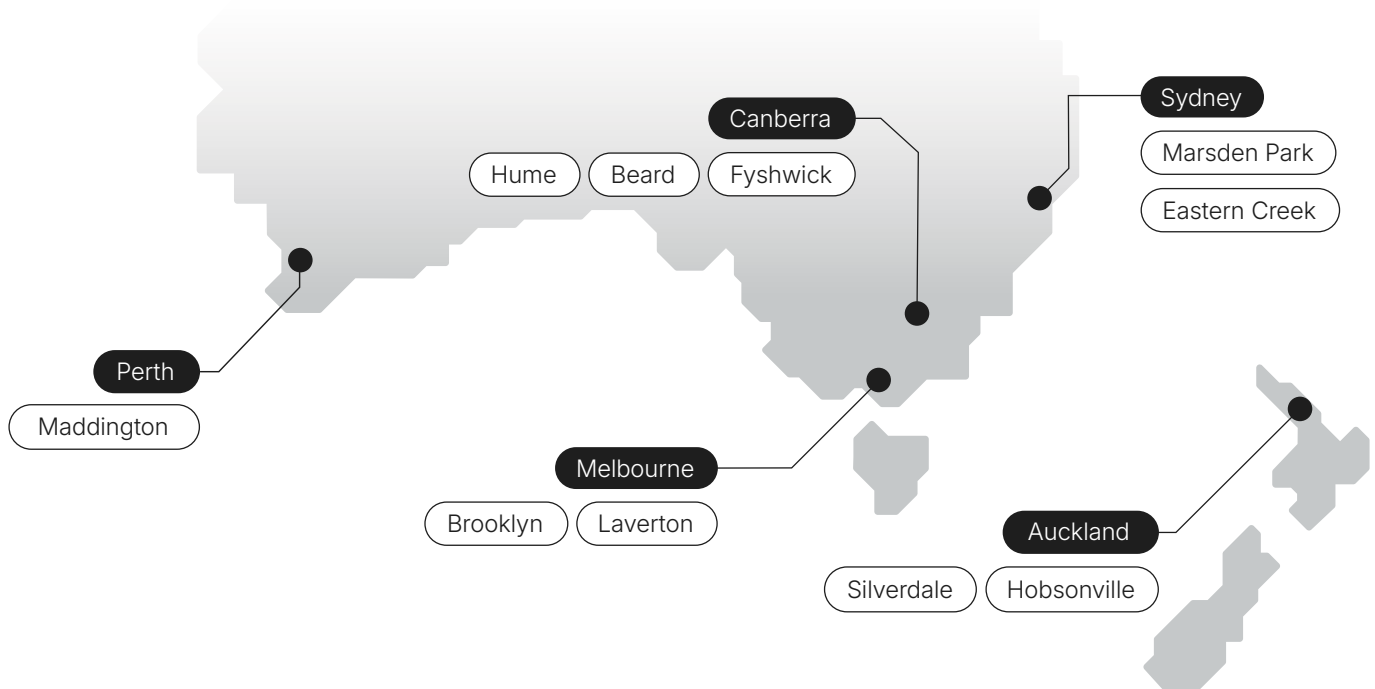
Our operations

CDC provides critical digital infrastructure services to customers supporting services essential to national security, economic resilience and social wellbeing.

Customers deploy and operate their own ICT equipment within CDC facilities, while CDC retains responsibility for site selection, asset design, construction, power, cooling, physical security and ongoing operations. CDC's supply chain enables the delivery of long life, secure digital infrastructure through the procurement of land, utilities, specialist equipment and construction services from trusted partners.

CDC's strategy is focused on delivering secure, resilient and scalable data centre infrastructure to meet growing demand and the infrastructure and systems reliance and availability requirements of these customers.

As at the end of the reporting period, CDC has 19 operational data centres across Australia and New Zealand. An additional 6 data centres are currently under construction across 4 regions, Canberra, Sydney, Melbourne and Perth.¹



1. Data as at end of FY26: 31 March 2026

Our operations cont.

CDC's operations span strategic site selection and land acquisition, infrastructure design and development, construction and commissioning, long-term operations and maintenance, and continuous improvement activities.

These activities are supported by a range of suppliers providing construction services, specialist equipment, technology infrastructure, utilities and professional services.

CDC's corporate headquarters are located in Canberra, Australian Capital Territory. We also maintain corporate offices in Sydney, Melbourne and Auckland, supported by operational locations across Australia and New Zealand.

In FY26, CDC employed approximately 450 employees across Australia and New Zealand. The majority of employees are highly skilled professionals employed on a permanent basis across operational, engineering, development, technology, customer, sustainability, corporate and support functions.

Our workforce provides operational and corporate support in:

- Canberra
- Sydney
- Melbourne
- Perth
- Auckland

CDC owns and operates its data centre facilities and separately leases certain office accommodation to support its operations.

Given the critical nature of the services provided by CDC and our customers, maintaining a strong security and governance culture is fundamental to our operating model. The majority of our workforce remained directly employed by CDC in FY26, reducing reliance on contingent labour arrangements. Employees are required to undergo appropriate pre-employment screening and ongoing security obligations relevant to their roles. These controls support workforce integrity, business continuity and the trust placed in CDC by our customers, stakeholders and communities.

Our supply chain

As a owner, operator and developer of data centre facilities, CDC partners with a trusted network of suppliers and contractors to develop, operate and maintain highly resilient digital infrastructure.

These suppliers include equipment manufacturers, engineers, designers, construction contractors, maintenance providers, information technology providers, utilities and professional service firms.

CDC's supply chain extends beyond our direct suppliers and includes the products, services and labour that contribute to the development, operation and maintenance of our data centre infrastructure. This includes suppliers of energy, construction materials, data centre equipment, technology products and professional services together with the upstream supply chains that support the delivery of those goods and services. More broadly, CDC operates within a wider value chain that includes customers, suppliers, regulators, providers of capital, employees and the communities in which it operates.

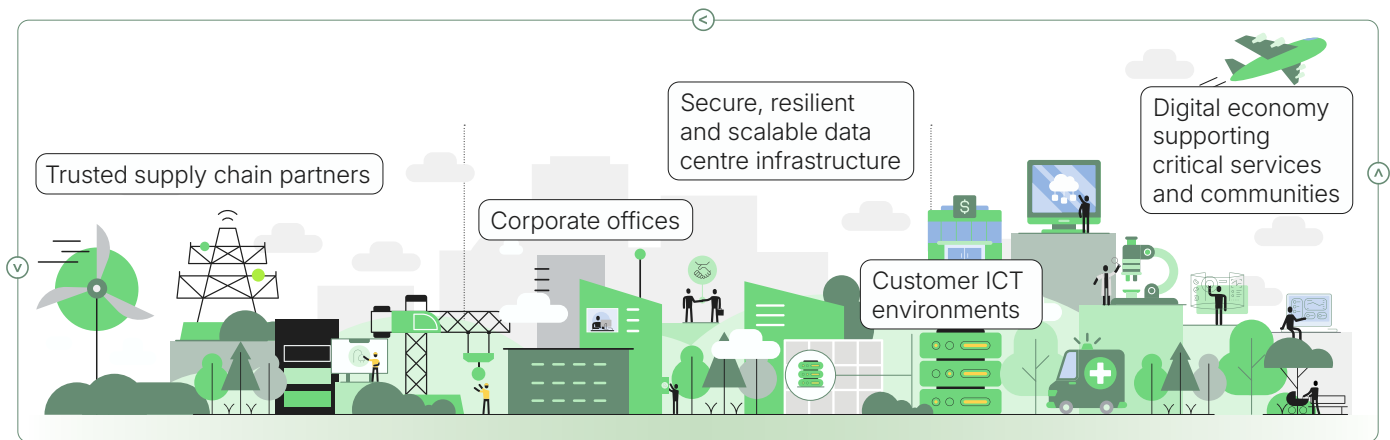
Over 98% of CDC's direct suppliers continue to be with suppliers domiciled in Australia and New Zealand. Many internationally headquartered suppliers operate through Australian or New Zealand subsidiaries with whom CDC contracts directly, meaning a significant proportion of CDC's direct procurement activity occurs within these jurisdictions.

While Australia and New Zealand are generally considered lower-risk jurisdictions, CDC recognises that modern slavery and broader human rights risks can arise in any country or sector, including through extended global supply chains associated with manufacturing, raw material sourcing, logistics, labour-intensive services and subcontracting arrangements. As CDC continues to expand its infrastructure footprint across Australia and New Zealand, understanding these risks across an increasingly complex supply chain remains an important area of focus.

The categories of procurement and supply chain activity that are most relevant to consider in our risk-based assessment have not changed since FY25. Suppliers of products in these categories continue to play a critical role in supporting the development, operation and maintenance of CDC's secure and resilient data centre infrastructure. While the nature and level of modern slavery risk vary across these categories, CDC's risk-based assessment continues to prioritise those categories where labour practices, manufacturing operations, raw material sourcing or complex subcontracting arrangements may contribute to heightened risk.

CDC value chain

CDC provides secure, sovereign demand-led infrastructure enabling Australia and New Zealand's digital economy.



Our supply chain

CDC's supply chain enables the delivery of long-life, secure digital infrastructure through the procurement of land, utilities, specialist equipment and construction services from trusted partners. Energy is procured to power our facilities and support customer digital environments.

Our operations

CDC translates digital demand into long-life physical infrastructure to enable secure compute, storage and connectivity, providing the critical systems and capacity that support security, and social and economic wellbeing.

Delivering for our customers

Customer ICT environments hosted within CDC facilities deliver essential digital services that support governments, critical infrastructure operators and communities.



Our supply chain cont.

Our risk-based assessment covers the following categories of procurement and supply chain activity:

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, fit out 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 centre equipment suppliers and manufacturers

CDC maintains long-standing relationships with a select group of strategic suppliers that provide critical electrical, mechanical and technology infrastructure used throughout our data centres. While these suppliers are typically large multinational organisations with established governance frameworks, their supply chains can extend across multiple countries and involve complex manufacturing and logistics networks. CDC therefore continues to engage with these suppliers to better understand their human rights governance arrangements, supply chain due diligence processes and approach to managing modern slavery risks within their operations and supply chains.

Potential risks within these supply chains may include labour practices associated with manufacturing facilities, component production, raw material extraction and lower-tier suppliers that are not directly visible to CDC.

Backup power generation equipment and fuel supply

CDC procures and maintains standby generation equipment to support the resilience and continuity of critical infrastructure services. These assets are typically sourced through global manufacturing supply chains involving specialised mechanical, electrical and electronic components. CDC also procures fuel to support the operation of its generators. CDC recognises that potential modern slavery risks may arise within upstream fuel supply chains, including extraction, refining and transportation activities.

CDC gives careful consideration to the potential for human rights and modern slavery risks associated with these elements as part of its broader supplier due diligence processes.

Facility management

CDC manages its data centre facilities in Australia and New Zealand through a workforce of permanent employees, including operations managers, service technicians and caretakers. Contractors are engaged to provide security and maintenance services. Facility management services for leased corporate office space, including cleaning, security and waste management, are provided through building owners and operators. Recognising that cleaning, security and labour-intensive service sectors can present elevated risks of worker exploitation in some circumstances, CDC includes these services within its supplier due diligence and monitoring activities.

Professional services

CDC engages a range of specialist service providers, including funding and financial services, external audit, legal, accounting, taxation and other professional advisory services. These services are principally sourced from organisations operating in Australia and New Zealand and are generally assessed as presenting lower inherent modern slavery risk.

Travel, hospitality, and accommodation

CDC procures travel, accommodation and flights for employees undertaking work-related travel. Travel is predominantly within Australia and New Zealand, with occasional international travel to support customer and business requirements. While these suppliers are generally engaged through established corporate travel arrangements, CDC recognises that labour rights risks may exist within global hospitality and tourism sectors.

Information Technology equipment

CDC procures information technology equipment, including laptops and other corporate technology hardware, from suppliers and resellers based in Australia and New Zealand. Although procurement occurs through local suppliers, the manufacture of information technology products often involves complex international supply chains, including component manufacturing and raw material extraction. CDC considers these factors as part of its broader assessment of supplier and supply chain risk.

Key insights on CDC supply chain

CDC uses Fair Supply as a risk identification and prioritisation tool to support supplier due diligence and engagement. Fair Supply supports risk-based supplier due diligence and prioritisation of supplier engagement activities.

In FY26, CDC assessed nearly 3 times the number of suppliers than we did in FY25. This increase reflects growth in CDC's supplier base and procurement activity rather than a change in assessment methodology. Total expenditure assessed also increased during the reporting period. Although expenditure increased during FY26, exposure per million dollars of expenditure remained broadly consistent with FY25 and CDC's overall exposure profile remained stable.

The assessment also confirmed that supplier spend continues to be concentrated amongst a relatively small number of strategic suppliers and that these suppliers are operating in sectors assessed as having low exposure to modern slavery risks. The remaining suppliers were operating in moderate-low exposure (noting one supplier, representing 0.01% of CDC's FY26 total expenditure, was assessed in the moderate category). CDC uses these insights to prioritise supplier engagement and due diligence activities on a risk-informed basis.

These findings support CDC's overall assessment that its direct supplier risk profile remains low, while reinforcing the importance of continued supplier engagement, targeted due diligence and ongoing monitoring of higher-risk supply chain categories.



Our top **30** suppliers represent over 87% of our spend. CDC has a network of trusted suppliers.



Over **85%** of these suppliers are operating in sectors assessed as having low risk in our Fair Supply KYS platform. The remaining suppliers were operating in moderate-low exposure (noting one supplier, representing 0.01% of CDC's FY26 total expenditure, was assessed in the moderate category).



Case study: strategic supplier engagement in action



Context

As part of CDC's commitment to responsible business practices and continuous improvement in modern slavery risk management, FY26 focused on deepening engagement with strategic suppliers operating in sectors with elevated risks.

Building on the learnings from CDC's Pilot Supplier Engagement Program, CDC continued to engage directly with suppliers to strengthen transparency, share best practices and better understand how modern slavery risks are identified, assessed and managed throughout complex global supply chains. One such engagement involved a workshop with a key technology supplier, Schneider Electric, provider of critical products for CDC's operations.

Schneider Electric is a global leader in energy management and automation, operating in over 100 countries. Their sophisticated products are sourced and manufactured across diverse jurisdictions, making supply chain governance a priority. Given the scale and complexity of their operations, CDC recognised the importance of understanding how Schneider Electric identifies and manages human rights risks across its supply chain.

Approach

The workshop moved beyond standard survey-based compliance to enable meaningful discussion about ethical supply chain governance. Schneider Electric shared detailed insights into its global program, which is anchored by a Trust Charter signed by employees, contractors and suppliers. This framework supports a speak-up culture and integrates sustainability metrics into performance KPIs.

Key elements of Schneider Electric's approach include:

- **Supplier assessments:** Rigorous desktop and on-site audits are conducted across all tiers of the supply chain. Nonconformities result in removal from the supply program, and volume agreements are used to incentivise ethical compliance.
- **Continuous monitoring:** Weekly dashboards and third-party inspections track supply chain risks by product, country and factory. Every component is screened for ethics, cybersecurity and compliance.
- **Training and improvement:** Annual mandatory training available in over 32 languages which covers ethics, cybersecurity and the Trust Charter. Non-completion results in system lockouts.
- **High-risk region oversight:** Independent and culturally diverse leadership is embedded in high-risk environments to mitigate local risks.
- **Stakeholder collaboration:** Schneider Electric works closely with NGOs, industry bodies and government agencies to stay ahead of emerging risks and best practices.

CDC also shared its evolving supplier risk management framework, including the use of modern slavery risk screening tools, supplier risk assessments and increased engagement with critical suppliers to better understand risk mitigation measures and opportunities for collaboration.

Outcome

The engagement reinforced the value of proactive supplier collaboration as a key component of effective modern slavery due diligence. It provided CDC with deeper visibility into supplier governance practices and strengthened confidence that strategic suppliers are actively managing human rights risks throughout their operations and supply chains.

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

Assessment of modern slavery risks in CDC business operations

As with previous reporting periods, CDC has assessed the risk of modern slavery within its business operations as low. This assessment reflects the robust labour laws and regulatory frameworks operating in Australia and New Zealand, where CDC's activities are centred, as well as CDC's governance arrangements, employment practices and strong security culture.

CDC employs staff in Australia and New Zealand and complies with the employment laws and workplace requirements applicable in both jurisdictions. CDC continues to monitor developments in the legislative and regulatory environment and, where appropriate, seeks external advice to support the ongoing protection of the rights and wellbeing of employees and contractors engaged by the business.

The refreshed Code of Conduct (the **Code**), launched during FY26, reinforces CDC's commitment to ethical behaviour, human rights, respect in the workplace and compliance with applicable laws. The Code applies to all directors, employees and contractors and forms part of CDC's broader governance framework.

CDC's recruitment practices seek to ensure:

- recruitment decisions are consistent with CDC's values;
- recruitment and selection processes are fair, equitable and merit-based; and
- recruitment activities align with CDC's diversity, equity and inclusion principles.

As an employer committed to fostering a diverse and inclusive workforce, CDC supports and respects the human rights of all employees and job applicants. Recruitment and employment practices are designed to attract, develop and retain employees from diverse backgrounds while ensuring fair treatment and equal opportunity.

CDC's direct employees are engaged in accordance with applicable laws and employment standards, including minimum wage requirements, leave entitlements, working hours, superannuation and other statutory employment obligations.

During FY26, CDC personnel continued to undertake governance and compliance training, including Code of Conduct training. In addition, targeted modern slavery awareness and risk identification training was delivered to relevant personnel in partnership with Fair Supply. This training focused on modern slavery risk indicators, due diligence processes and practical approaches to identifying and managing risks within supply chains. CDC intends to expand modern slavery awareness training more broadly across the organisation as part of its ongoing capability-building program.

CDC also maintains an independent whistleblower service, enabling employees and other eligible persons to raise concerns confidentially and anonymously.

Assessment of modern slavery risks in CDC supply chains

CDC continued implementation of its Modern Slavery Action Plan during FY26 and further refined its understanding of supply chain risks through supplier risk assessments, due diligence activities and engagement with strategic suppliers. CDC has continued to maintain a zero-tolerance approach to forced labour, bonded labour, child labour, human trafficking, unreasonable working hours, denial of fair wages and benefits, discrimination, harassment, restrictions on freedom of association and unsafe or hazardous working conditions.

CDC continues to utilise the Fair Supply risk assessment platform to support supply chain risk identification, due diligence planning and supplier prioritisation activities. The platform assists CDC in identifying areas where modern slavery risks may exist within complex domestic and global supply chains and informs the allocation of due diligence and supplier engagement activities.

During FY26, CDC strengthened its supplier governance and procurement processes to support more consistent consideration of modern slavery risks during supplier onboarding, supplier review and procurement decision-making. CDC also continued its engagement with strategic suppliers and continued to apply a risk-based approach to enhanced due diligence where identified risk indicators warranted closer review.

As a result of these activities, CDC has identified the following key modern slavery risk categories within its supply chains, which continue to be reviewed and updated as part of our ongoing due diligence program.

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 or New Zealand based subsidiaries of multinational organisations. Equipment and components are often sourced through global manufacturing supply chains.	Risks may arise through raw material sourcing, component manufacturing and lower-tier suppliers not directly visible to CDC. During FY26, CDC continued engagement with strategic suppliers in this category and undertook enhanced due diligence where risk indicators warranted further review. Refer to case studies; <u>strategic supplier engagement in action</u> and <u>enhanced due diligence</u> .
Professional services	Low	Highly skilled, professional workforce, service providers and advisors located in Australia and New Zealand.	Strong labour protections and professional regulatory frameworks contribute to the low-risk assessment.
Design, construction, fitout, maintenance of data centres	Low	Local suppliers and contractors support CDC's infrastructure development activities. Some materials and equipment may be sourced through international supply chains.	Risks may arise through upstream manufacturing, labour hire arrangements, subcontracting and overseas production of construction materials and equipment.
Travel, hospitality, accommodation	Moderate-low	Services are predominantly sourced in Australia and New Zealand.	Some suppliers operate complex international networks and may be exposed to labour rights risks associated with global hospitality and tourism sectors.
Information technology equipment and services	Low	The majority of suppliers are located in Australia and New Zealand.	Information technology products often rely on complex international manufacturing supply chains, including component manufacturing and raw material extraction.
Backup power generation equipment and fuel supply	Moderate-low	Backup generators, associated components and fuel are used to support the resilience of CDC's critical infrastructure operations.	Risks may arise through global manufacturing supply chains, component production, fuel extraction, refining and transportation activities. Historical risks within parts of the energy sector continue to justify ongoing monitoring and due diligence.

Through ongoing risk assessment, supplier engagement and enhanced due diligence activities, CDC continues to refine its understanding of modern slavery risks within its supply chains and prioritise those areas where the potential for adverse human rights impacts may be elevated.

7. Actions taken to address risks

During FY26, CDC further integrated modern slavery risk management into procurement and supplier governance, with a focus on Fair Supply risk insights, enhanced due diligence, strategic supplier engagement and targeted training.

A key focus during FY26 was the continued use of Fair Supply insights to support risk-based prioritisation of supplier due diligence activities and identify areas where additional review may be warranted. CDC also strengthened engagement with strategic suppliers operating within complex global supply chains and continued to improve internal awareness and capability through targeted modern slavery training for relevant personnel.

CDC also enhanced internal procurement and supplier governance processes to support more consistent consideration of modern slavery risks during supplier onboarding, supplier reviews and procurement decision-making. These improvements strengthen CDC's ability to identify suppliers requiring additional review and apply proportionate due diligence where potential risks are identified.

At the time of publishing this Statement, CDC had developed a Modern Slavery Remediation and Escalation Process to support a consistent and proportionate response where actual or potential modern slavery concerns are identified through due diligence activities, supplier engagement, whistleblower reports or other reporting channels. The process outlines escalation pathways, governance responsibilities, investigation and assessment requirements, and the actions that may be considered to address identified risks, including supplier engagement, enhanced due diligence, corrective action planning and ongoing monitoring. The framework is intended to support timely decision-making, accountability and continuous improvement, while remaining focused on the rights, safety and wellbeing of potentially affected people.

CDC continues to work closely with strategic suppliers to improve transparency and understanding of modern slavery risks within their operations and supply chains. This includes supplier engagement workshops, targeted due diligence activities and the sharing of good practices to improve understanding of human rights risks across complex supply chains.



Case study: enhanced due diligence

Context

During FY26, CDC's supplier risk assessment process identified a supplier or product pathway requiring enhanced review. The risk indicator did not mean that modern slavery had been identified. Rather, it indicated that the nature of the product, manufacturing pathway, country or sector exposure warranted closer review consistent with CDC's risk-based approach.

Enhanced due diligence undertaken

In partnership with a globally recognised investigations agency, CDC undertook enhanced due diligence to better understand the relevant supplier's governance arrangements, labour controls, supply chain oversight and approach to managing modern slavery and broader human rights risks. This included review of available supplier information, engagement with relevant internal stakeholders and consideration of information available through CDC's due diligence processes.

Outcome of enhanced due diligence

Based on the information reviewed, CDC was satisfied that the identified risk was being appropriately managed and did not identify issues requiring escalation at that stage. CDC nevertheless determined that further practical engagement would support a deeper understanding of the supplier's operations and the controls in place.

Factory visit

A CDC employee subsequently visited the relevant factory as part of operational engagement. In addition to operational matters, the visit provided an opportunity to consider modern slavery risk factors in practice, including site conditions, management systems, labour arrangements, worker welfare indicators and escalation pathways. The visit supported CDC's understanding of how supplier policies and controls were applied at an operational level.

What CDC learned

The engagement reinforced the value of combining data-led risk assessment with direct supplier engagement. It also demonstrated that enhanced due diligence is most effective when it is proportionate, evidence-based and connected to procurement, operational and supplier relationship management processes.

Next steps

CDC will continue to use risk assessment insights, supplier engagement and targeted due diligence to prioritise further review where higher-risk indicators are identified. Learnings from this example will inform future procurement process improvements, supplier engagement and training materials.

Governance of modern slavery risks

CDC maintains a strong commitment to sound corporate governance, transparency and accountability. These principles support the long-term performance of the business and help ensure modern slavery risks are identified, assessed and managed in a manner consistent with CDC's values and risk management framework.

The CDC Group Board has ultimate responsibility for overseeing CDC's governance framework, sustainability commitments, risk management processes and material business risks, including human rights and modern slavery risks. The Board is supported by the Audit and Risk Committee and the Senior Leadership Team, which oversee the implementation of policies, processes and controls designed to identify, assess and manage risks across the business and supply chain.

As CDC continues to expand its operations across Australia and New Zealand, the Enterprise Risk Management Framework continues to evolve to support the organisation's growth and increasingly complex operating environment. Effective identification, assessment, management and reporting of risks are critical to CDC's ability to identify and address potential modern slavery and broader human rights risks across its operations and supply chains.

Governance framework

Strong governance provides the foundation for effective modern slavery risk identification and management. Responsibility for oversight and management of modern slavery risks is integrated within CDC's broader governance and risk management framework.

Key governance responsibilities	
Leadership level	Responsibilities
Board	Provides strategic oversight of governance, risk management, sustainability and material business risks, including human rights and modern slavery risks. Oversees CDC's values and culture and supports alignment between strategic decision-making and responsible business practices.
Audit and Risk Committee	Provides detailed oversight of risk management frameworks, controls and reporting, including matters relevant to modern slavery and broader ESG risks.
Senior Leadership Team	Responsible for day-to-day implementation of CDC's governance frameworks, policies, risk management processes and supplier management activities. Supports the integration of modern slavery risk considerations into operational and procurement decision-making.

CDC's governance policy framework includes:

- **CDC Code of Conduct**
- Supplier Code of Conduct
- Supplier Engagement Policy
- **Whistleblower Policy (recently updated and will be released during FY27)**
- Fraud and Corruption Control Plan
- **Environment, Social and Governance (ESG) Statement of Commitment**
- Enterprise Risk Management Framework
- Supplier governance and procurement processes

At the time of finalising this Statement, CDC had commenced a refresh of its Whistleblower Policy which will be implemented in FY27 with training. The updated policy reinforces available reporting pathways and supports the confidential and, where preferred, anonymous reporting of concerns, including those relating to actual or suspected modern slavery, human rights or labour rights issues.

Code of Conduct

CDC's values and Code of Conduct establish the behavioural expectations for everyone working for or on behalf of, the CDC Group. The Code provides guidance on ethical decision-making and supports a consistent approach to compliance, integrity, respect for human rights and responsible business practices.

The Code applies to all directors, employees and contractors and is communicated through onboarding processes, annual compliance activities, ongoing communications and training programs. It forms an important component of CDC's approach to preventing modern slavery and promoting ethical conduct throughout its operations and supply chains.

The Code of Conduct reinforces CDC's commitment to:

- acting lawfully, fairly and with integrity;
- maintaining safe, respectful and inclusive workplaces;
- protecting human rights and treating people with dignity and respect;
- conducting business ethically and transparently;
- creating positive social, environmental and economic outcomes; and
- speaking up where conduct does not align with CDC's values or expectations.

The Code also outlines available reporting pathways and directs personnel to support services, including CDC's independent whistleblower program.

The Code is supported by a suite of governance policies and procedures. Any reported breaches of the Code or supporting policies are investigated and addressed in accordance with CDC's governance framework.

Throughout FY25, CDC undertook a substantial review and refresh of its Code of Conduct. The updated Code was rolled out during FY26 and reinforced CDC's commitment to responsible business practices, sustainability, ethical behaviour and respect for human rights. The rollout was supported through ongoing governance communications and training activities and forms part of CDC's broader approach to building awareness of modern slavery and human rights risks across the organisation.



Supplier Code of Conduct

CDC's Supplier Code of Conduct (SCOC) outlines the minimum standards expected of suppliers and forms an important component of CDC's supplier governance framework and standard purchasing arrangements. The SCOC establishes CDC's expectations regarding labour standards, human rights, ethical business conduct, health and safety, environmental responsibility and legal compliance.

These standards include:

Topic	Requirement
Working Hours	Workers must not exceed reasonable working hours or applicable legal limits for regular and overtime work.
Fair Wages and Benefits	Workers must receive at least the minimum wage and all legally required benefits.
Non-Discrimination	Employment decisions must be based on merit and capability and must not discriminate on prohibited grounds.
Harassment and Disciplinary Practices	Workers must be treated with dignity and respect and must not be subject to harassment, abuse, coercion or inhumane treatment.
Modern Slavery and Human Rights	Suppliers must not engage in forced labour, bonded labour, child labour, slavery, servitude or human trafficking and must respect internationally recognised human rights principles.
Health and Safety	Suppliers must provide and maintain safe and healthy workplaces for workers.

During FY26, CDC commenced a review and uplift of its SCOC to ensure it continues to reflect evolving expectations regarding human rights, labour standards and responsible business practices. Expectations relating to labour practices, human rights and modern slavery risks continued to be incorporated into supplier onboarding, supplier due diligence and supplier engagement activities. The SCOC also supported discussions with strategic suppliers regarding their own modern slavery governance arrangements and supply chain due diligence practices.

CDC's program of work includes assessing supplier alignment with these standards during procurement and supplier management activities. Depending on the nature of the goods or services being supplied and the associated risk profile, additional contractual requirements relating to social, environmental, ethical or governance matters may also apply.

Suppliers are expected to monitor compliance with these standards within both their own operations and their supply chains and to take appropriate action where non-compliance is identified. Suppliers are also expected to notify CDC if they become aware of actual or potential breaches of the SCOC, including matters relating to modern slavery or human rights risks.

Reporting issues and concerns

CDC remains committed to fostering a culture in which employees, contractors, suppliers and other stakeholders are encouraged to raise concerns and contribute to a safe, respectful and ethical working environment. CDC's remediation and escalation processes provide a structured framework for assessing and responding to modern slavery concerns identified through whistleblower reports, supplier engagement, due diligence activities or other reporting channels.

Employees are encouraged to raise concerns through their leaders, the People and Culture team or other available reporting channels. Supporting policies and reporting pathways are made available through CDC's governance framework and cover matters including:

- employment conditions;
- discrimination, bullying, harassment, sexual harassment and victimisation;
- work health and safety, wellbeing, environment and physical security; and
- unethical, unlawful or improper conduct.

CDC's Whistleblower Policy continues to provide protections for eligible whistleblowers, including current and former employees, contractors, suppliers and their relatives and dependants. The policy is supported by an independent whistleblower service which allows concerns to be raised confidentially and, where preferred, anonymously through telephone and online reporting channels.

The whistleblower framework forms an important component of CDC's broader governance approach by providing employees and external stakeholders with a mechanism to raise concerns regarding actual or suspected misconduct, including conduct that may be relevant to modern slavery, human rights or labour rights risks.

During FY26, CDC continued to promote awareness of its governance framework, reporting pathways and whistleblower protections as part of broader governance and compliance activities.

Where CDC identifies an actual or potential modern slavery concern, CDC will assess the matter through relevant governance, legal, procurement, risk and supplier management processes. Depending on the nature of the issue and CDC's relationship to the risk, this may include further investigation, engagement with the supplier, corrective action planning, use of contractual rights, escalation to relevant internal governance forums, and consideration of appropriate remediation pathways. CDC's approach is intended to be proportionate, rights-compatible and informed by the safety and wellbeing of affected people.



Supply chain due diligence and monitoring

CDC applies a risk-based approach to supplier due diligence. Supplier risk assessments, supplier engagement activities and procurement processes are used to identify suppliers, sectors and supply chain activities that may warrant enhanced review. This enables CDC to prioritise due diligence resources and focus engagement on areas of comparatively higher exposure.

Formal supplier contracts remain an important control within CDC's risk management framework and include requirements relating to compliance with applicable laws, responsible business practices and the Supplier Code of Conduct.

CDC continued to utilise the external platforms during FY26 to support modern slavery risk identification, supplier due diligence and prioritisation of supplier engagement activities. As identified above, Fair Supply continues to provide an important source of risk intelligence, helping CDC better understand potential risks within both direct and indirect supply chains and informing the allocation of due diligence resources.

CDC also continued direct engagement with strategic suppliers operating within complex global supply chains, including suppliers involved in data centre infrastructure, electrical and mechanical equipment, technology solutions and construction activities. These engagements improved CDC's understanding of supplier governance arrangements and modern slavery risk management practices and reinforced the importance of long-term supplier relationships as a mechanism for improving transparency and supporting continuous improvement.

Sustainability function

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 a Sustainability SteerCo 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 and FY27 agenda

During FY26, CDC reviewed the effectiveness of actions taken to identify and manage modern slavery risks across both its operations and supply chains.

This included a review of internal and external outcomes, employee feedback, whistleblower reporting channels, supplier due diligence activities, supplier engagement outcomes from our supply chain due diligence program, and information generated through the Fair Supply platform and other monitoring platforms.

As in previous reporting periods, no concerns, complaints or reports relating to modern slavery were identified through CDC's employee feedback channels, whistleblower reporting mechanisms, audit activities or formal grievance processes during FY26.

Internal and external audits continued to be undertaken as part of CDC's broader assurance program. These activities included audits against ISO 9001, ISO 14001, ISO 45001 and ISO 27001 standards, which include consideration of supplier management processes and governance controls. Additional assurance activities were also undertaken through statutory financial reporting processes.

While CDC has assessed its overall modern slavery risk profile to remain low to moderate, FY26 activities highlighted the importance of maintaining strong supplier relationships, continuing workforce education and strengthening procurement and supplier governance processes as supply chains continue to evolve.

FY27 priorities

CDC recognises that effective modern slavery risk management requires ongoing improvement. During FY27, CDC intends to focus on the following priority areas:

- further embedding modern slavery considerations within supplier onboarding, procurement and supplier governance processes;
- expanding workforce awareness by making modern slavery training available more broadly across the organisation;
- continuing enhanced due diligence and supplier engagement activities where elevated risk indicators are identified;
- refining supplier risk assessment and monitoring activities using Fair Supply risk intelligence and reporting;
- reviewing and updating relevant supplier governance documentation, including the Supplier Code of Conduct and supporting supplier governance processes;
- updating and implementing the next phase of CDC's internal Modern Slavery Action Plan;
- continuing collaboration with suppliers, industry bodies and specialist advisers to strengthen understanding of emerging human rights and modern slavery risks; and
- continuing to monitor emerging modern slavery and human rights risks, regulatory developments and evolving stakeholder expectations to inform CDC's ongoing risk management and improvement activities.

Through these activities, CDC seeks to further strengthen its ability to identify, assess and address modern slavery risks across its operations and supply chains while supporting a culture of responsible business conduct and continuous improvement.

9. Consultation and approval

This Statement was prepared through consultation with the reporting entities owned and controlled by CDC Group Holdings Pty Ltd, together with representatives from CDC's Senior Leadership Team, Sustainability, Legal, People and Culture, Risk and Assurance and other relevant business functions.

The consultation process considered the requirements of the Modern Slavery Act 2018 (Cth), information relating to CDC's operations and supply chains, modern slavery risk assessments, supplier due diligence activities and actions undertaken during FY26 to identify and manage modern slavery risks.

This Statement has been approved by the Board of CDC Group Holdings Pty Ltd on 10 September 2026 and signed by the Chief Executive Officer on behalf of CDC.

CDC remains committed to its purpose, vision and values and to continuously improving the effectiveness of its modern slavery risk management framework. Through ongoing governance, supplier engagement, due diligence, workforce capability-building and continuous improvement activities, CDC seeks to contribute to safer, fairer and more ethical outcomes across its operations and supply chains.

Greg Boorer

Founder and Chief Executive Officer



10. Appendix

Index to Mandatory Reporting Requirements		
Modern Slavery Act Clause Reference	Topic	Where addressed in this Statement
16(1)(a)	Identify reporting entity	About this Statement; Structure, Operations and Supply Chain (Our Structure)
16(1)(b)	Structure, operations and supply chains	Structure, Operations and Supply Chain
16(1)(c)	Risks of modern slavery practices	Risks of Modern Slavery in Business Operations and Supply Chains
16(1)(d)	Actions taken to assess and address risks	Actions Taken to Address Risks; Governance of Modern Slavery Risks; Supply Chain Due Diligence and Monitoring
16(1)(e)	Assess effectiveness	Assessing the Effectiveness of Our Actions and Agenda for the Next Reporting Period
16(1)(f)	Consultation	Consultation and Approval
16(1)(g)	Other relevant information	Message from the CEO; Introduction and FY26 Highlights; About CDC
16(2)	Approval by governing body	About this Statement; Consultation and Approval; Signature Page

