

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

## Introduction From the Chairman.

Modern slavery is an offence under national and international law. The offence includes human trafficking, slavery, servitude, forced labour, debt bondage and illegal child labour, all of which have in common coercion to exploit victims and undermine their freedom. We do not tolerate any form of modern slavery and we are therefore committed to taking appropriate steps to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

## Organisational Structure.

Soprano Design Pty Ltd, located in Australia with head office at Level 15, 132 Arthur St North Sydney NSW 2060 is the parent company. Its subsidiaries worldwide comprise the Soprano Design group ("Soprano Group"). The Soprano Group has approximately 240 employees worldwide and operates in Australia, New Zealand, Europe, UK, US, Latin America and Southeast Asia.

Soprano Design Pty Ltd adopts this Modern Slavery and Human Trafficking Statement for itself and its subsidiaries including Soprano Design (UK) Limited.

This is a consolidated statement of all our Soprano Group entities' actions to address modern slavery risk.

Our organisation chart is attached as Schedule 1 to this Statement.

## Modern Slavery Risk in Our Business and Supply Chains.

We are a cloud-based Communications Platform as a Service (CPaaS) provider of mobile messaging technology for Mobile Network Operators (MNO's) and enterprise customers worldwide. Our services provide enterprise and government customers with the digital messaging technology they need to maintain and build relationships and distribute information efficiently.

The supply chain we use to deliver services to our customers is predominately made up of large and highly regulated companies operating in the telecom sector (mobile network operators and aggregators) and global IT and cloud providers, such as hosting providers and enterprise software companies, which are not in high-risk industries. While we use telecommunications suppliers to deliver messages across the globe, most hosting and enterprise suppliers we use are multinationals headquartered in the US or Australia.

Other than computer and utility suppliers providing the equipment and power necessary to conduct our office activities (like computers for our employees), we engage with very few suppliers of materials or goods.

Our services such as operations and customer service support are provided by skilled employees in Soprano Group entities under common management and policy frameworks in various countries globally to mitigate risk. There is shared oversight by leadership teams of all Soprano Group entities.

Based on the above operating model, we assess that the risk of modern slavery in our operations and supply chain is low.

## Our Values, Policies and Culture.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. The Soprano Group's values, people culture and policies listed below reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains:

- **Whistleblower Policy** We strive to ensure the highest standards of integrity and promote a culture of honest and ethical behaviour, corporate compliance and good corporate governance. As part of this commitment, we've put procedures in place to ensure that our employees, contractors and suppliers can report any unethical or illegal conduct involving our business to Soprano's Whistleblower Protection Officer via a dedicated email address as further detailed in the Whistleblower Policy.
- **Health and Safety Policy** We are committed to providing and promoting a safe working environment that minimizes health and safety risks and supports accident prevention for the people we employ or who may be affected by our work.
- **Code of Conduct** We strive to maintain the highest standards of employee conduct and ethical behaviour when conducting business or managing our supply chain. The Code requires every individual working for or on our behalf to act ethically, conduct business with integrity and comply with legal requirements. It also includes guidance on reporting any questions or concerns relating to ethical issues or legal compliance. We encourage our personnel to disclose any behaviour that could represent a violation of our Code.
- **Anti-Bribery and Corruption Policy** We are committed to acting ethically and have zero tolerance for bribery and corruption. In accordance with these commitments, and to support ethical behaviours, we have also developed a detailed policy for countering bribery and corruption.

## Due Diligence Processes for Slavery and Human Trafficking.

As part of our initiative to identify and mitigate risk we have in place systems to monitor potential risk areas in our supply chains, including through our standard contract clauses which requires compliance with the

law and reserves our right to audit, and centralised in-house legal review of operational and supplier contracts. This review includes a risk assessment of major existing suppliers and all new suppliers.

We encourage and support all employees, contractors and customers to report any suspicion of potential violations or ethical issues without fear of retaliation and through confidential channels that protect whistleblowers. We annually review modern slavery statements provided by our key suppliers (such as the MNO Telstra in Australia) to assess any risks they report.

Our Senior Leadership Team, which includes people-leaders from several Soprano Group subsidiaries, takes responsibility for implementing this statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and within the supply chains.

## Training.

We've continued our compliance training program across our business to ensure an appropriate level of understanding of our policies aimed at supporting our employee's understanding of human rights and our ethical behaviour standards, and therefore mitigating the risks of modern slavery and human trafficking in our supply chains and our business.

Everyone who joins our company or is currently working for us must complete training courses on our Code of Conduct and other key company policies, with annual refresher training. Our training platform allows us to monitor who has completed it, and we send training reminders to those employees overdue to complete their training and to their managers.

## Consulting Within The Soprano Group.

In FY25 we continued our consultation process within the parent entity Soprano Design Pty Ltd and our owned entities, engaging with them in identifying, assessing and addressing modern slavery risks across the Soprano Group's operations and supply chains. We prioritise Soprano Group owned operating entities for engagement on modern slavery based on whether they are reporting entities, their size and the nature of their activities.

Although no new entities were incorporated or acquired during FY25, consultation with any new entities in the Soprano Group includes due diligence and adopting or aligning that entity's policies with those of the Soprano Group, proposing or supporting modern slavery risk mitigation efforts, assessing vendors and providing standard Soprano Group training modules, materials and updates,

Consultations were conducted with the senior leadership team and managers from controlled entities to facilitate information gathering, inform and contribute to the statement development, understand specific mitigation approaches and integrative consultations into the statement development.

Through the consultation process, we found that the nature of the activities of entities within the Soprano Group are substantially the same as the activities of

Soprano Design Pty Ltd itself, being the provision of CPaaS platforms and short message aggregation services. Employees in all regions are educated, skilled, white-collar professionals and paid competitive remuneration and benefits (benchmarked using reputable third-party wage data benchmark providers).

As a result of our consultation process, the modern slavery risk profile of all Soprano Group entities has been assessed as low.

## Measuring Our Effectiveness.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Our People and Culture department monitors the completion of mandatory training on an annual basis.
- We encourage our employees' feedback at any time. All staff have the chance to use our biannual Global Employee Survey, which is available in multiple languages and is kept completely confidential, to tell us about their experience of working at the Soprano Group and help us build a better place to work.
- Our employees are also encouraged to speak up about any ethical issue or concerns they're worried about. They can raise concerns if they see something that breaches our policies or the law to their manager, the Company Secretary or our Board members. We also have a dedicated whistleblower email address where individuals can submit their concerns. To date, we have received no reports of modern slavery within our own business or supply chain.

## Further Steps

We will continue to improve the work we have done this year as we recognise that our review and assessment of our actions to identify and address our modern slavery risks is an ongoing and evolving process. We intend to take the following further steps to prevent slavery and human trafficking during financial year 2026:

- improve awareness of modern slavery risks through staff communications and targeted training; and
- improve the monitoring of suppliers for compliance, including gaining more oversight into the deeper levels of our supply chains through annual supplier surveys and tier 2 mapping.

This statement was approved by the Board of Soprano Design Pty Ltd on 3 December 2025 and is signed by Richard Favero, who is a Director of each Soprano Group company, on behalf of the Soprano Group.

DocuSigned by:  
  
 589BC48477274F2...  
 Richard Favero  
 Founder & Chairman  
 Soprano Design Pty Ltd

SCHEDULE I

