NOUS GROUP - MODERN SLAVERY STATEMENT & POLICY - FY 2026

Modern slavery is a serious human rights issue that can arise in the operations and supply chains of organisations across jurisdictions. Australia, the United Kingdom, and Canada have each implemented legislation aimed at preventing and addressing modern slavery risks.

Nous Group (as defined below) believes in conducting business ethically and maintains a zero-tolerance approach to modern slavery.

This Modern Slavery Statement and Policy (**Statement**) describes the approach Nous Group takes to identify, assess, mitigate, and respond to modern slavery risks in our operations and supply chain.

Any concerns or suspected instances of modern slavery relating to Nous Group can be reported to governance@nousgroup.com.

Reporting Entities and Structure

This Statement is for the financial year ending 30 June 2026. This Statement was approved on 30 October 2026 by:

- Timothy Orton, the sole director of Nous Group International Pty Ltd (**NGI**), the parent company of Nous Group; and
- the Nous Executive Board (**NEB**), the advisory board for the Nous Group of companies.

This Statement is a joint statement made on behalf of the following reporting entities within Nous Group:

1. NGI;
2. Nous Group Pty Ltd (**Nous Australia**);
3. Nous Group (UK) Ltd (**Nous UK**);
4. Nous Group Holdings (Canada) Ltd (**Nous Canada**);
5. Nous Data Insights Group Pty Ltd (**NDI Group**);
6. Nous Data Insights Pty Ltd (**NDI**);
7. Nous Data Insights (ANZ) Pty Ltd (**NDI ANZ**);
8. Nous Data Insights (UK) Ltd (**NDI UK**);
9. Nous Data Insights (Canada) Ltd (**NDI CA**); and
10. Health Policy Analysis Pty Ltd **(HPA**),

(together, **Nous Group** or **Nous**).

Our operations

Nous Group is an international business providing management consultancy and university benchmarking services, with approximately 650 people working across Australia, the United Kingdom, and Canada.

We partner with leaders to shape world-class businesses, effective governments, and empowered communities. Conducting business ethically is an important part of how we operate and underpins our approach to identifying and managing modern slavery risks in our operations and supply chain.

The entities comprising Nous Group are each wholly owned or controlled by NGI.

The purpose of this Statement is to:

- describe how Nous Group identifies, assesses and responds to modern slavery risks in its operations and supply chain;
- set out the policies, processes and other controls Nous Group uses to manage those risks; and
- support Nous Group's compliance with applicable modern slavery legislation.

For the purposes of this Statement, '**modern slavery'** refers to serious forms of exploitation in which coercion, threats, or deception are used to deprive individuals of their freedom, including practices such as forced labour, servitude, debt bondage and human trafficking.

Supply Chain

Nous Group engages a broad range of suppliers and subcontractors to support its operations and delivery of client work. These include providers of information technology, professional and corporate services, travel and transport, office supplies, catering, facilities management, and specialist consulting and technical services.

Where possible, Nous also seeks to engage suppliers and partners that align with our values and contribute positively to the communities in which we operate, including organisations that support employment opportunities for vulnerable or under-represented groups.

Nous deals directly with many of its suppliers. However, some suppliers rely on their own suppliers and subcontractors to provide goods and services to Nous, which can create exposure to modern slavery risks further down the supply chain, including with entities with which Nous does not have a direct contractual relationship.

Nous maintains a central reporting channel for concerns regarding modern slavery or other unethical practices at governance@nousgroup.com. Concerns are escalated to relevant Legal and Risk personnel for assessment and determination of the appropriate response.

Risks of Modern Slavery

Nous Group considers the risk of modern slavery within its direct workforce to be low. Our employees are engaged under employment arrangements that comply with applicable employment laws and standards in the jurisdictions in which we operate.

As a provider of management consulting and university benchmarking services, Nous does not directly operate in industries generally associated with a high inherent risk of modern slavery. Accordingly, we consider the risk of Nous directly causing or contributing to modern slavery through our core operations to be low.

However, we recognise that modern slavery risks may arise indirectly through our supply chain, particularly where our suppliers source goods or services from industries, geographies, or labour markets with higher exposure to modern slavery risks. Relevant examples include:

- IT equipment and electronic devices, particularly where manufacturing occurs through complex global supply chains;
- cleaning and security services engaged through building and facilities management providers;

- office supplies and other manufactured goods; and
- large technology and software providers with complex international supply chains.

Actions taken to address the risks of Modern Slavery and assessment of effectiveness

Nous Group maintains a zero-tolerance approach to modern slavery and seeks to work with suppliers and subcontractors that operate ethically and appropriately manage modern slavery risks within their own operations and supply chains. We recognise the need to regularly review our policies and procedures as Nous Group's business, supply chain and understanding of modern slavery risks evolve.

Nous applies a risk-based approach to identifying and assessing modern slavery risks in its supply chain. Nous' current supplier risk assessment methodology, updated in FY2025 and applied during FY2026, considers factors including:

- the nature of the goods or services provided;
- the size and complexity of the supplier;
- annual expenditure with the supplier;
- the potential for exposure to higher-risk industries, geographies, or labour practices; and
- available information about the supplier's own operations and supply chain.

This methodology is applied across suppliers engaged by Nous Group as a whole, as well as suppliers engaged by individual entities within the group.

Through this assessment, Nous has identified several supplier categories with comparatively greater potential exposure to modern slavery risks, including:

- cleaning and security services provided through building and facilities management arrangements;
- IT equipment providers, particularly those involved in the manufacturing of IT components;
- suppliers of office products and other manufactured goods; and
- SaaS IT vendors for whom our annual spend is greater than $100,000, particularly those with large supply chains across multiple countries.

During FY2026, Nous continued to apply this risk-based approach to identify modern slavery risks and prioritise suppliers for further review.

Nous undertakes due diligence on suppliers assessed as presenting a higher level of modern slavery risk. This includes reviewing a supplier's Modern Slavery Statement, policies, and other publicly available information, and requesting additional information directly where appropriate.

Nous has greater visibility of its direct suppliers than of lower tiers of its supply chain. Where relevant and practical, Nous also considers information relating to lower-tier supply chains and uses supplier due diligence to assess how identified suppliers are managing modern slavery risks within their own operations and supply chains.

Nous uses this information to assess the extent to which relevant suppliers have processes in place to identify, manage, and respond to modern slavery risks in their operations and supply chains. Where concerns are identified, these may be escalated to relevant Legal, Risk, and ESG personnel for further assessment and determination of an appropriate response.

If an instance of modern slavery or a material modern slavery risk were identified, Nous would determine an appropriate response having regard to the nature of the issue and Nous' relationship to the risk. This may include seeking further information from the relevant supplier, requiring corrective or risk mitigation actions, increasing monitoring, using contractual remedies where appropriate, and supporting or cooperating in remediation where Nous has caused or contributed to harm.

Nous also maintains broader controls intended to support the management of modern slavery risks, including a Supplier Code of Conduct, modern slavery provisions in standard subcontractor agreements, and internal reporting and escalation mechanisms. Modern slavery awareness also forms part of Nous' annual compliance training for staff, supported by internal modern slavery resources.

No instances of modern slavery requiring remediation were reported or otherwise identified during FY2026 within Nous' operations or supply chain.

Nous assesses the effectiveness of its approach through its annual review of modern slavery risks and supplier due diligence activities. This includes considering whether higher-risk suppliers have been appropriately identified and assessed, whether additional information or follow-up action is required, and whether Nous' risk assessment methodology, policies, and controls remain appropriate. Nous also considers any concerns raised through its internal reporting mechanisms and reviews its approach as part of the annual Modern Slavery Statement process.

Nous considers its risk assessment and due diligence processes to provide a proportionate approach to identifying and managing modern slavery risks given the nature of its business and supply chain. Nous will continue to review these processes and make improvements where appropriate.

Consultation for this Joint Statement

This Statement is a joint statement issued on behalf of NGI, Nous Australia, Nous UK, Nous Canada, NDI Group, NDI, NDI ANZ, NDI UK, NDI CA, and HPA.

Nous Australia performs most of the administrative and support functions on behalf of the broader Nous Group, including finance, legal, marketing, and people functions. This supports a coordinated approach to modern slavery risk management and reporting across the entities covered by this Statement.

Relevant Legal, risk, and senior management representatives were consulted in the preparation and review of this Statement, including in relation to Nous Group's operations, supply chain, modern slavery risks, due diligence activities, and other controls. This Statement was reviewed through these group governance arrangements before being considered and approved by the NEB and Timothy Orton (as described below).

The NEB comprises Timothy Orton (Nous Group's Managing Principal and CEO), and a selection of Function Leads and Principals from across Nous Group. The NEB includes representatives from Nous UK, while Nous Canada, NDI Group, NDI, NDI ANZ, NDI UK, NDI CA, and HPA are represented through Nous Group's Managing Principal and CEO.

This Statement was approved by Timothy Orton, the sole director of NGI (the parent company of Nous Group), and sole director of the other Nous Group companies, including Nous Group UK; and by the NEB (the advisory board for the Nous Group).

Other relevant information

NGI is the parent company of Nous Group and operates primarily as a holding company, engaging only a small number of suppliers directly. NGI is included in this joint Statement to support a consistent group-wide approach to identifying and managing modern slavery risks.

Conclusion

Nous Group remains committed to maintaining a proportionate and risk-based approach to identifying and managing modern slavery risks in its operations and supply chain.

Any concerns or suspected instances of modern slavery relating to Nous Group can be reported by emailing governance@nousgroup.com.



Timothy Orton

Managing Principal and CEO of Nous Group

Sole director of NGI and each other Nous Group company