

Modern Slavery Statement and *Policy*

Voluntary statement and policy.

Version v1.0 Approved 8 October 2026 Effective 8 October 2026 Owner Managing Director
Next review October 2027

Document control

VERSION	DESCRIPTION	APPROVED BY	APPROVAL DATE	EFFECTIVE DATE
v1.0	Initial release	Daniel Hooper, Managing Director	8 October 2026	8 October 2026
Policy owner	Daniel Hooper, Managing Director			
Applies to	Shockwave Media Pty Ltd, its directors, employees and contractors, and its suppliers			
Review	Annually. Next review due October 2027, or earlier if law, contract requirements or our operations change materially.			
Published at	shockwavemedia.com.au/government/policies/			

01 Purpose and status

Shockwave Media Pty Ltd is below the A\$100 million consolidated revenue threshold for mandatory reporting under the Modern Slavery Act 2018 (Cth). We publish this statement and policy voluntarily, structured around the mandatory criteria in section 16 of that Act. It also reflects the expectations of the Modern Slavery Act 2018 (NSW), the NSW Anti-slavery Commissioner's Guidance on Reasonable Steps, and the modern slavery clauses in NSW Government Core& and ICT Agreement contracts, including taking reasonable steps across our operations and supply chain, flowing obligations down to suppliers, and notifying government customers of actual or suspected modern slavery.

Modern slavery includes trafficking in persons, slavery, servitude, forced labour, debt bondage, forced marriage, deceptive recruiting and the worst forms of child labour.

02 Our structure, operations and supply chain

We are an Australian engineering studio founded in 2015, based in NSW, with a team of 41. We design, build and support AI systems (LLM applications, agents, RAG and AI automation), custom web applications and portals, iOS and Android apps, websites and content management systems, integrations and APIs, and cloud hosting, together with discovery, UX and ongoing support. Government engagements are delivered by Australian-based staff, with hosting and data in Australia. Our main supply chain categories are:

- ◆ **ICT hardware:** laptops, phones, monitors and peripherals.

- ◆ **Cloud hosting and infrastructure:** hyperscale and other cloud providers operating Australian regions.
- ◆ **SaaS and software:** development, design, collaboration, productivity and security tools.
- ◆ **Professional services and contractors:** specialist contractors, recruitment, accounting, legal and similar services.
- ◆ **Office and facilities:** office supplies, cleaning and facilities services.

03 Risks of modern slavery

We assess our direct operations as lower risk because our work is skilled professional work. The higher risks sit in our supply chain:

CATEGORY	RISK	WHY
ICT hardware	High	Electronics manufacturing and raw-material extraction (for example cobalt, tin, tantalum) carry known forced and child labour risks deep in the supply chain. NSW Government guidance treats hardware procurement as high risk.
Cloud and data centres	Medium	Outsourced cleaning, security and construction services, and server hardware manufacturing.
SaaS vendors	Low to medium	Mostly skilled workforces, but outsourced support, content moderation or data-labelling functions can carry risk.
Contractors and services	Low to medium	Risk of underpayment or exploitative arrangements in labour hire, cleaning and facilities services.

04 Actions: due diligence

- ◆ Maintain a supplier register with a modern slavery risk rating for each material supplier, reviewed annually.
- ◆ Prefer established vendors that publish modern slavery statements, and review those statements for high and medium risk suppliers.
- ◆ Require new and renewing suppliers to accept our Supplier Code of Conduct, and include modern slavery clauses in supplier contracts where we can, including clauses equivalent to the obligations our government customers place on us.
- ◆ Buy hardware through reputable resellers, keep devices in service for longer, and ask high-risk suppliers about their supply chain due diligence.
- ◆ Check that contractors and service providers pay at least lawful minimum wages and entitlements.

05 Grievance mechanism

Anyone, including workers, supplier staff and members of the public, can raise a concern about modern slavery connected to our operations or supply chain via the contact form at shockwavemedia.com.au. Concerns can be raised anonymously. Each concern is reviewed by the Managing Director, treated confidentially, and the person raising it will not be victimised. We aim to acknowledge concerns within 5 business days where contact details are provided. If someone is in immediate danger, contact emergency services. Concerns can also be reported to the Australian Federal Police or the NSW Anti-slavery Commissioner.

06 Remediation

If we find that we have caused, contributed to or are directly linked to modern slavery, we will put the safety and interests of affected people first. We will work with the supplier on a time-bound corrective action plan, seek expert or agency advice where needed, report to authorities where appropriate, and notify affected government

customers as our contracts require. We treat ending a supplier relationship as a last resort, because sudden exit can harm affected workers, but we will do so if a supplier will not remedy the problem.

07 Training and awareness

Staff who buy goods or services, or manage suppliers, receive modern slavery awareness training at induction and annually. All staff are told about the grievance mechanism.

08 Assessing effectiveness

Each year we review: the share of material suppliers risk-rated and covered by the Supplier Code; training completion; grievances received and how they were handled; and any corrective actions. Results are reported to the Managing Director and inform the next statement.

09 Review and approval

This statement and policy is reviewed annually. As a single entity, we have no owned or controlled entities to consult. Based in NSW, Australia. Contact us via shockwavemedia.com.au.

Approval

This statement was approved by the principal governing body of Shockwave Media Pty Ltd on 8 October 2026 and is signed by Daniel Hooper, Managing Director.

Approval date: 8 October 2026 · **Effective date:** 8 October 2026 · **Next review:** October 2027

Signed: Daniel Hooper (signed original held on file)