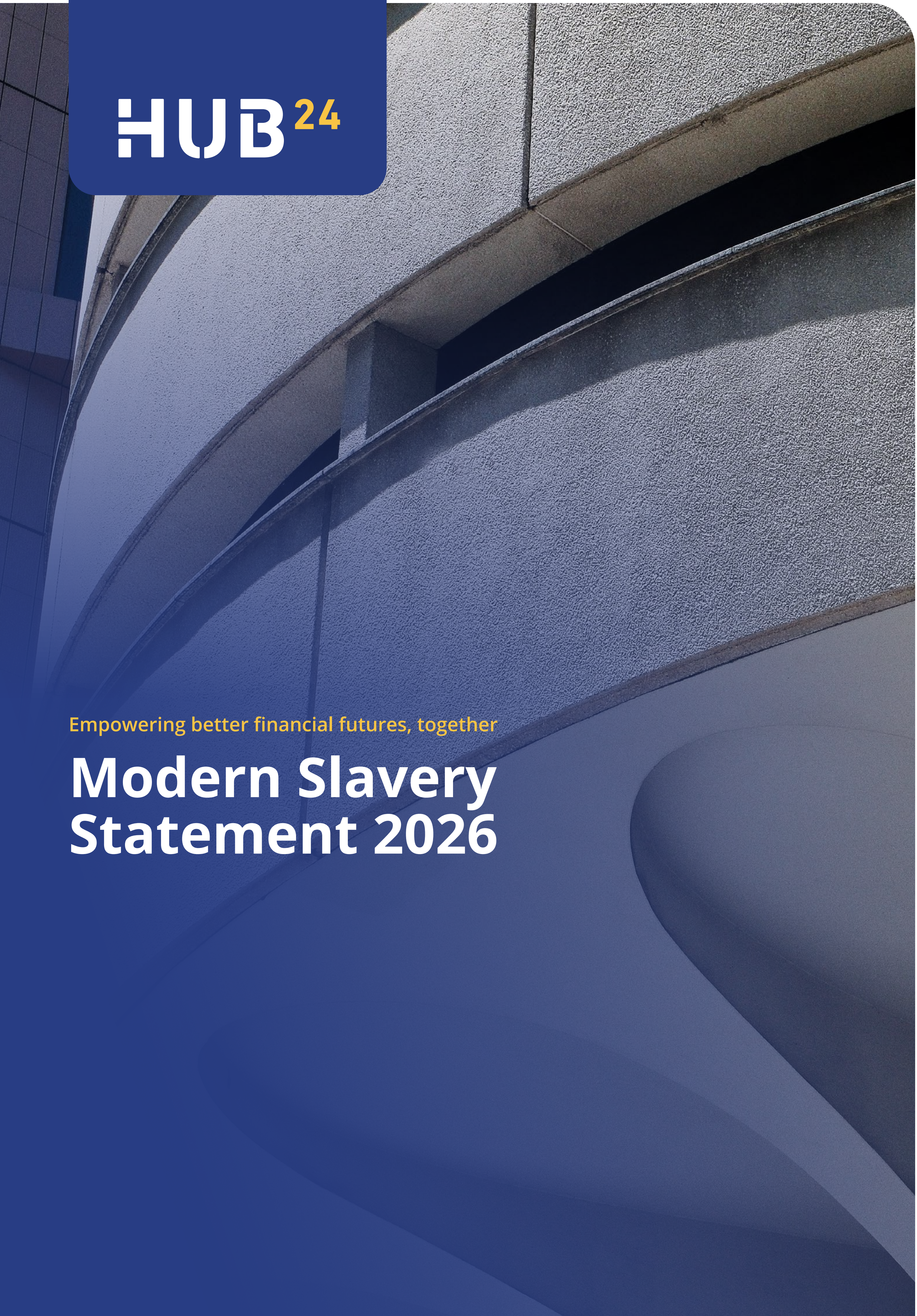


Empowering better financial futures, together

Modern Slavery Statement 2026

Modern Slavery Statement 2026

Our Modern Slavery Statement is a Joint Statement made by HUB24 Limited and HUB24 Custodial Services Ltd. HUB24 Limited submits this Joint Statement on behalf of both reporting entities.

In this Joint Statement, the expressions “we”, “us”, “our”, “the Group” and “HUB24” refer to all reporting entities covered by the Statement. Unless otherwise noted, we operate under group-wide policies and procedures to identify, assess and address modern slavery risk.

This Statement is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) and outlines the actions taken by HUB24 to identify and mitigate modern slavery risk in our value chain during the financial year ended 30 June 2026, as well as our ongoing commitment to continuous improvement.

References to “modern slavery” follow the definitions in the *Modern Slavery Act 2018* (Cth), including slavery, servitude, forced or compulsory labour and human trafficking.

Contents

A message from the Managing Director & CEO

Welcome to HUB24's Modern Slavery Statement for FY26, detailing our progress in managing modern slavery risk across our operations, people and supply chains.

Andrew Alcock
Managing Director & CEO, HUB24 Limited

At HUB24, our purpose is empowering better financial futures together. This extends beyond financial outcomes to how we operate as a business, including our responsibility to uphold human rights and act ethically across our operations and supply chain.

As we present our Modern Slavery Statement for FY26, we recognise that modern slavery risk remains a significant and persistent global issue. It continues to cause profound harm to individuals and communities, while generating substantial illegal profits that reinforce exploitation, organised crime and systemic inequality. This underscores the importance of active, ongoing efforts by organisations to identify and address these risks.

The regulatory environment in Australia is also evolving, with a clear shift toward increased accountability. Proposed reforms to the Modern Slavery Act, including potential civil penalties and strengthened due diligence expectations, alongside the establishment of the Anti-Slavery Commissioner, signal a move beyond disclosure to more active management of modern slavery risk.

In this context, HUB24 continued to strengthen its approach during FY26. Key activities included undertaking an updated supplier risk assessment to improve our understanding of modern slavery risk across our supply chain, enhancing our Whistleblower Policy, and updating our annual mandatory training program to reinforce employee awareness. Together, these initiatives support a more consistent and risk-based approach to identifying and managing modern slavery risk.

This Statement outlines our progress and areas of focus going forward. While our approach continues to evolve, we remain committed to continuous improvement and to embedding responsible business practices that support sustainable growth and maintain the trust of our stakeholders.

Mr Andrew Alcock
Managing Director & CEO, HUB24 Limited

This statement was approved by the HUB24 Limited Board on 14 August 2026.

Our structure, operations, and supply networks

Our Structure

Operating and financial review

Group overview

HUB24 Limited ("the Company") is a financial services Company that was established in 2007 and is a leading provider of integrated platform, technology and data solutions to the Australian Wealth industry.

The HUB24 Group's purpose is to *'empower better financial futures, together'*. To fulfil this purpose, the HUB24 Group delivers platform and technology solutions that empower financial professionals to deliver better financial futures for their clients.

Operating segments and principal activities

The HUB24 operates two revenue generating segments and a corporate segment as shown in the diagram below:

HUB24 Limited
(ASX: HUB)

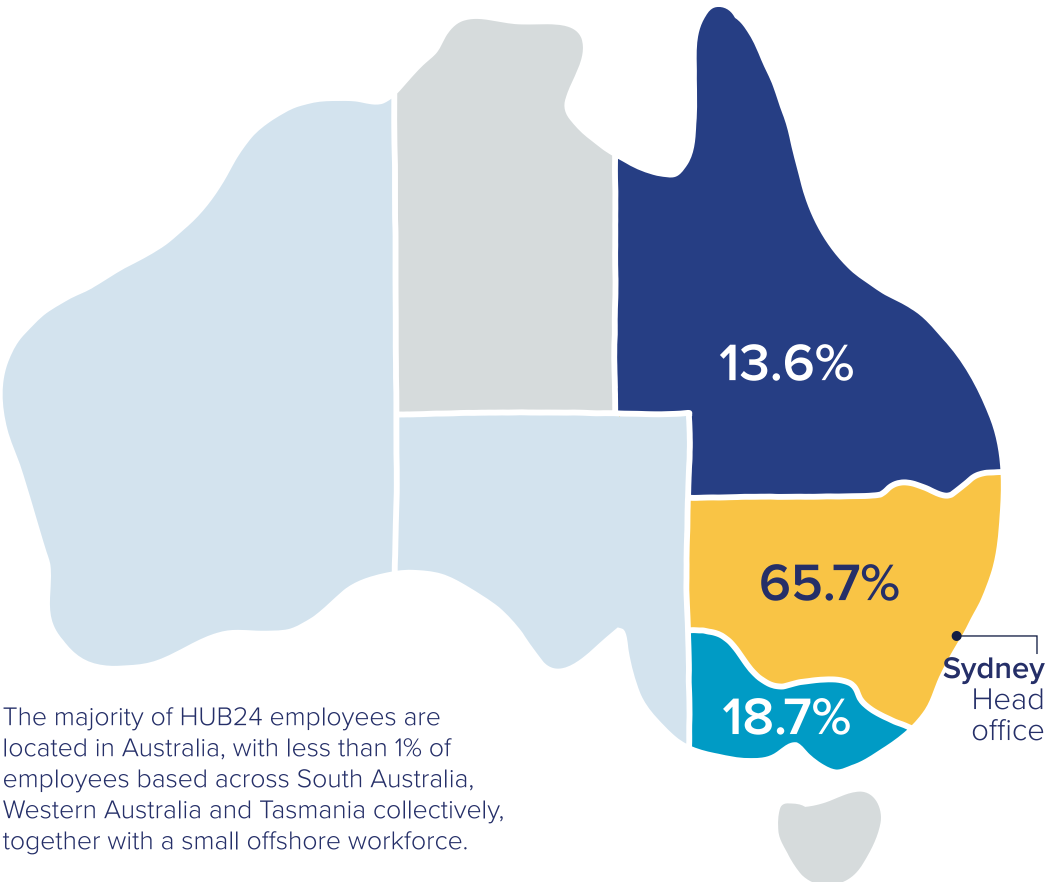
Platform	Tech Solutions	Corporate
HUB24 platform PARS myprosperity	Class NowInfinity HUBconnect	Group support functions Strategic investments Treasury

Our Operations

Our core operations are performed from our registered offices located at Level 17, 5 Martin Place, Sydney NSW 2000.

As at 30 June 2026, the HUB24 Group employed 1,096 people on a full-time equivalent (FTE) basis (FY25: 962). Our workforce consists of employees on permanent, fixed-term, and casual contracts, with around 89.4% employed on a permanent basis.

Our people are situated nationally, with our Head Office located in Sydney.



The majority of HUB24 employees are located in Australia, with less than 1% of employees based across South Australia, Western Australia and Tasmania collectively, together with a small offshore workforce.

Our structure, operations, and supply networks

Platform

The Platform segment comprises the HUB24 investment and superannuation platform (HUB24 platform), Portfolio Administration & Reporting Services (PARS) and myprosperity.

HUB24 platform

The HUB24 Group is an issuer of financial services products including the HUB24 platform, which is used by financial professionals to efficiently administer, invest and report on their clients' assets. The HUB24 platform offers a comprehensive range of investment products to suit individual client needs through superannuation or other legal structures.

As one of the fastest growing platform providers in the market, the HUB24 platform is recognised for providing choice and innovative product solutions. It offers financial professionals and their clients a comprehensive range of investment options, including market- leading managed portfolio solutions, and enhanced transaction and reporting functionality.

PARS

HUB24 also offers PARS, a non-custody portfolio service which provides administration, corporate action management and tax reporting services for financial professionals and their clients with a 'whole of wealth' view of their assets.

myprosperity

myprosperity is a leading provider of client portals for accountants and financial professionals. The all-in-one secure portal delivers a total view of household wealth, making it easier for households to collaborate with their financial professionals across all aspects of their financial lives. myprosperity's client portal is used by 545 accounting and financial advisory firms, representing circa 132,000 households.[1]

Tech solutions

The Tech Solutions segment comprises Class, NowInfinity and HUBconnect.

Class and NowInfinity

Class delivers trust accounting, portfolio management, legal documentation, corporate compliance and SMSF administration solutions to around 6,800 customers[2] across Australia who utilise Class to drive business automation, increase profitability and deliver better client service.

Class's core offering is self-managed superannuation fund (SMSF) administration software. Its solutions have gained industry recognition for product innovation and customer service excellence.

Customers using the Class Super, Class Portfolio and Class Trust solutions represented circa 227,000 accounts as at 30 June 2026.

NowInfinity operates in the legal entity document and corporate compliance segments.

HUBconnect

HUBconnect provides technology and data services to the wealth industry, delivering innovative solutions to enable financial professionals to efficiently run their businesses and service their clients.

HUBconnect leverages data and technology capability to provide solutions that solve common challenges faced by stockbrokers, licensees and professional advisers in the delivery of financial advice.

HUBconnect Broker has a long history of working with stockbrokers to deliver innovative business reporting and support tools. HUBconnect Broker streamlines and integrates client data and connects to a range of broking business reporting and back-office support tools that provide key insights and enable the efficient delivery of stockbroking operations.

For financial advisers and licensees HUBconnect utilises innovative technology such as machine learning, artificial intelligence, and natural language processing. HUBconnect integrates, refines, stores and supplies structured and unstructured data.

Through integrated data feeds, automated reporting and analytics, HUBconnect delivers efficiencies for some of the time-consuming and costly processes that increase the cost of delivering advice. HUBconnect serves a growing number of respected and high profile financial services companies and their clients.

1. HUB24 data as at 30 June 2026.
2. Class service providers represents practices of accountants, administrators and advisers as at 30 June 2026.

Our structure, operations, and supply networks

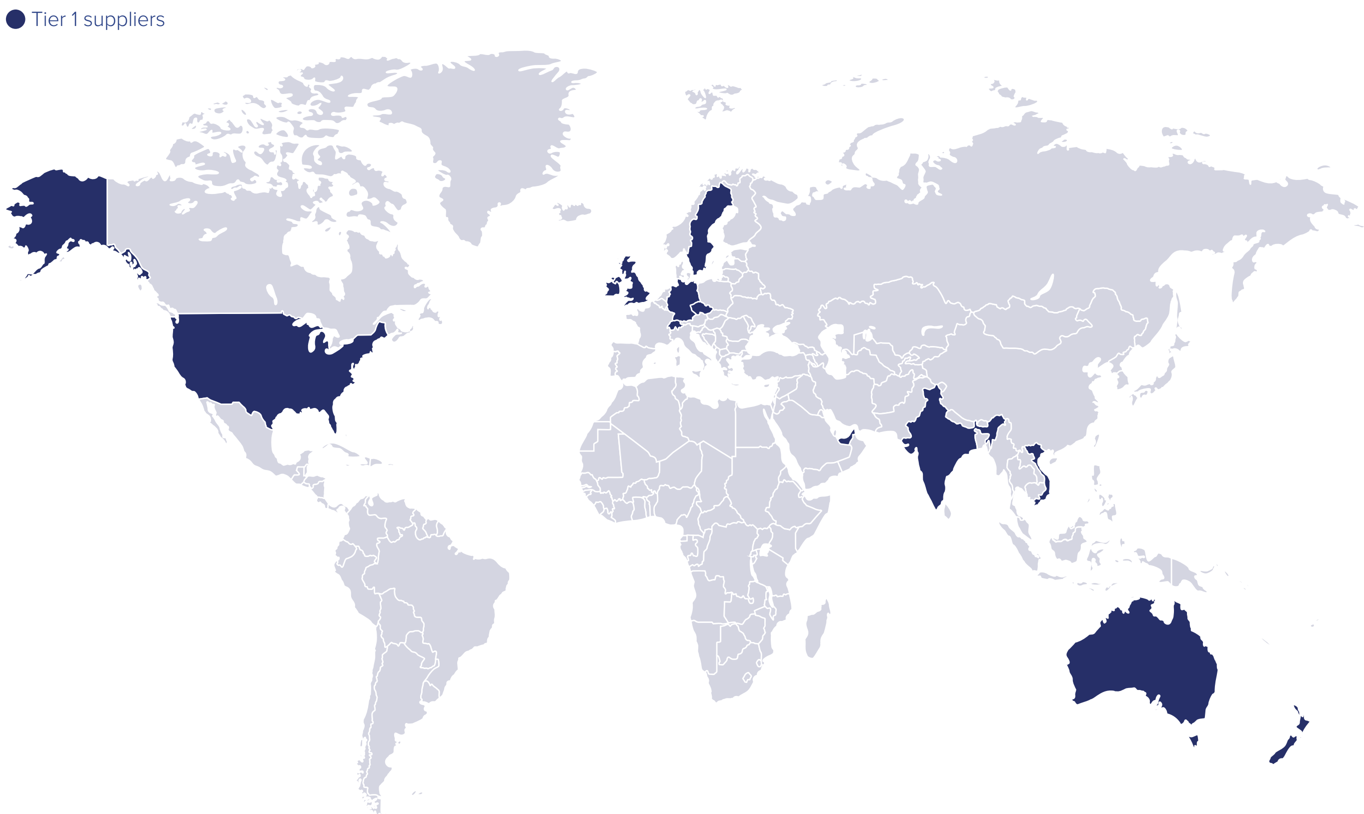
Corporate

The Corporate segment comprises Group support functions together with strategic investments, dividends and interest earnings. As all strategic investments are minority non-controlling holdings, dividends from these investments are recognised within this segment, and valuation movements on these investments are recognised at fair value through other comprehensive income.

Our Supply chain profile

Our business is primarily office-based encompassing hybrid working arrangements for Our People. The types of goods and services we procure are mainly in relation to the HUB24 Platform Service. Our supplier arrangements range from one-off purchases with non-contracted suppliers through to multi-year, large value strategic partnerships governed by supplier contracts.

In FY26, more than approximately 96% of the Group's external vendor payments were with tier 1[1] (direct) suppliers located in Australia and the United States. The remaining included countries such as Vietnam, Singapore, Sweden, United Kingdom, India, Germany, New Zealand, Switzerland, Czechia, United Arab Emirates and Ireland. Refer to the below figure, which illustrates the geographic distribution of the Group's tier 1 suppliers during FY26.



1. Tier 1 suppliers are suppliers with whom HUB24 has a direct contractual relationship and from whom HUB24 directly procures goods or services. This information is sourced using external vendor payment data from our accounts payable system. It excludes credit card spend, employee expenses and taxes. No accounting treatments are applied.

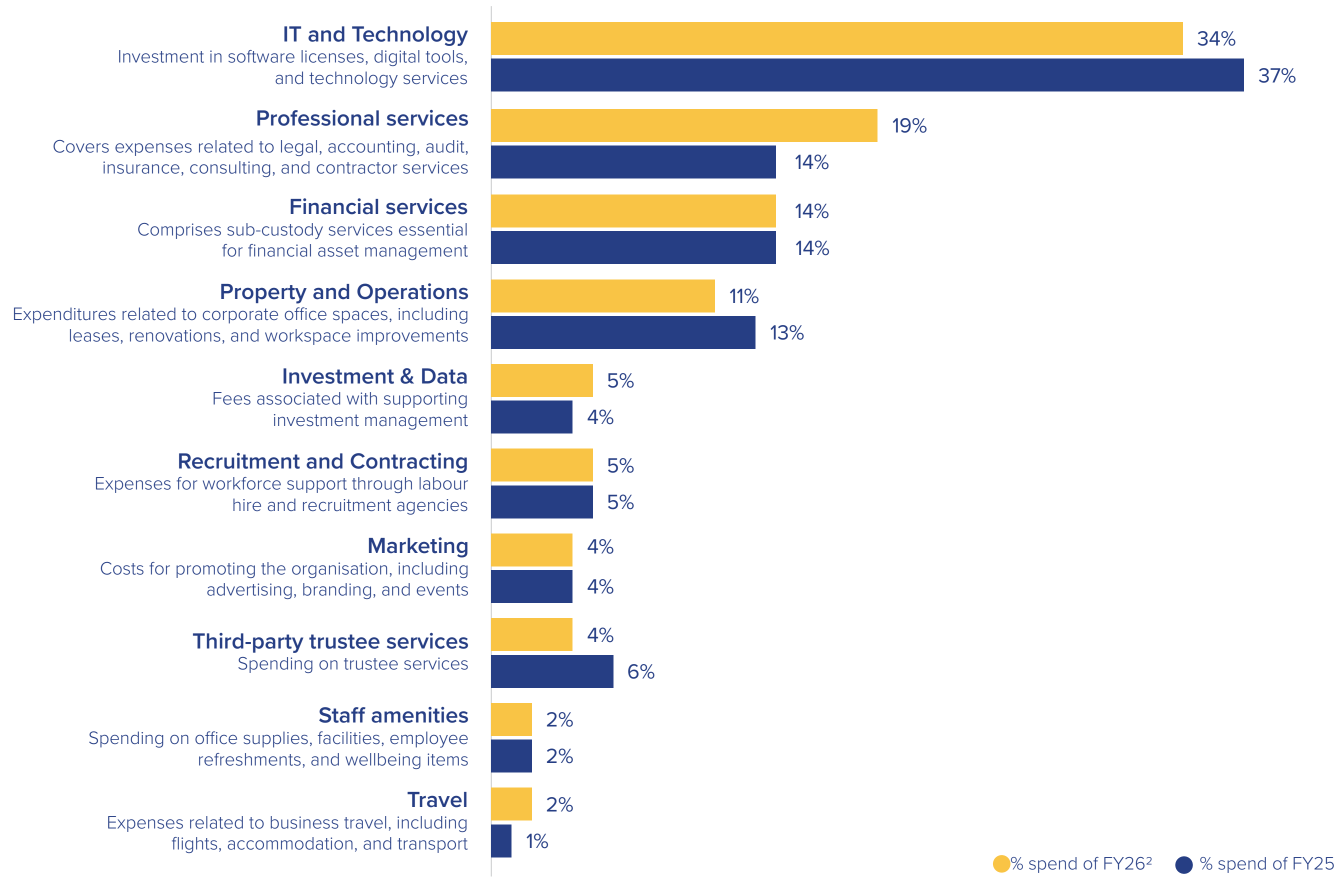
While HUB24's direct supplier relationships are primarily with providers of technology, professional, financial, property and operational services, we recognise that modern slavery risk may arise further within our extended supply chains. These extended supply chains may include subcontracted labour arrangements, outsourced service providers, technology hardware manufacturing, facilities and cleaning services, travel and accommodation providers, and other third-party suppliers operating across multiple jurisdictions. As a result, our assessment considers both direct supplier relationships and potential modern slavery risk that may exist beyond Tier 1 suppliers, acknowledging that visibility over Tier 2 and deeper supply chains remains limited.

The key inputs to our operations include technology and software services, professional and advisory services, financial and investment services, recruitment and workforce support services, property and facilities services, and other third-party providers that support the delivery of our platform, technology and wealth management solutions. These key inputs are reflected in the supplier spend categories outlined below.

Our major categories of supplier and third-party spend include:

- Professional Services
- IT and Technology
- Recruitment and Contracting
- Property and Operations
- Financial Services
- Third-party Trustee Services
- Investment and Data Services
- Travel
- Staff Amenities
- Marketing

Total supplier and other third-party spend in FY26 across major categories:[1]



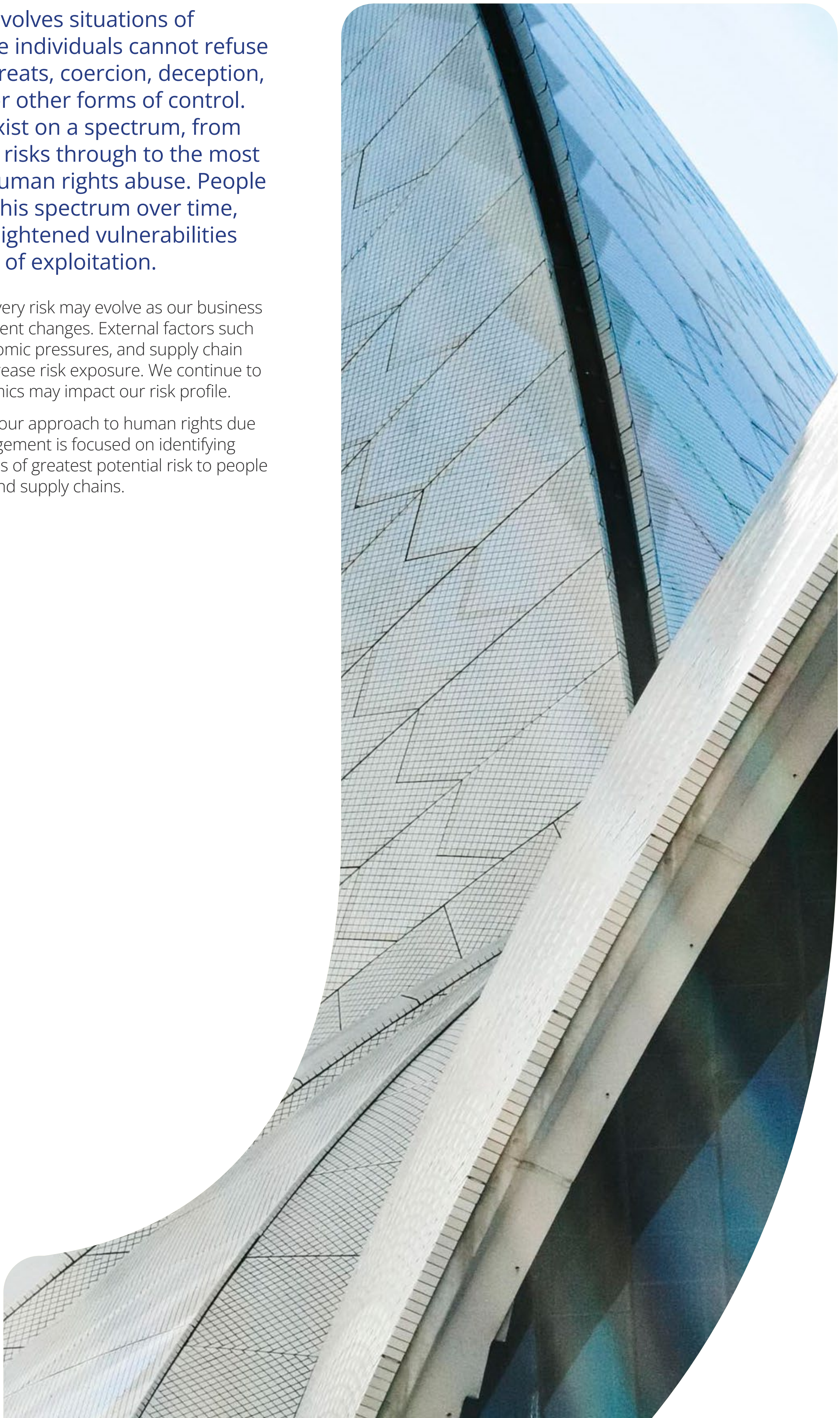
1. This information is sourced using external vendor payment data from our accounts payable system. It excludes credit card spend, employee expenses and taxes. No accounting treatments are applied.

Identifying and assessing modern slavery risk

Modern slavery involves situations of exploitation where individuals cannot refuse or leave due to threats, coercion, deception, abuse of power, or other forms of control. These practices exist on a spectrum, from less visible labour risks through to the most severe forms of human rights abuse. People may move along this spectrum over time, and those with heightened vulnerabilities are at greater risk of exploitation.

For HUB24, modern slavery risk may evolve as our business and operating environment changes. External factors such as global conflicts, economic pressures, and supply chain disruptions can also increase risk exposure. We continue to assess how these dynamics may impact our risk profile.

Given these challenges, our approach to human rights due diligence and risk management is focused on identifying and addressing the areas of greatest potential risk to people across our operations and supply chains.



Identifying and assessing modern slavery risk

Our risk identification and assessment processes

The processes we use to identify and assess our modern slavery risk are specific to the various roles we play as a platform provider. The diagram below outlines our general approach:

1 Understanding modern slavery risk factors and indicators

We continue to monitor and build our understanding of emerging typologies of modern slavery and the factors that may indicate its presence, which include:

Geographic risk

Countries / regions which are known to have higher human rights risks, including modern slavery risk. E.g. conflict, weak rule of law, corruption, displacement and state failure to protect human rights.

Vulnerable groups risk

Groups more likely to be exposed to harm or unable to advocate for themselves in exploitative situations. E.g. migrant workers, children, base skill workers.

Business model risk

Business models that have higher human rights risks, including modern slavery risk. E.g. labour hire and outsourcing, third-party contracting arrangements.

Sector or category risk

Industries, products and services regarded as having more significant inherent modern slavery risk. E.g. services, good not for resale, raw materials, high levels of seasonality.

2 Conducting risk assessments

We incorporate modern slavery risk into our risk assessments processes to identify and manage potential modern slavery risk and impacts across our business.

Workforce

We implement rigorous recruitment procedures, including verifying the right to work and conducting background checks on all prospective employees. Our workforce predominantly comprises skilled labour, and we do not employ children in any capacity. In addition, we comply with relevant Work, Health & Safety legislation and Modern Award requirements for salary and entitlements.

Supply chain

Suppliers are assessed based on sector/industry, type of products/services, geographic location and entity-specific factors.

Operations

We assess how ESG and human rights considerations, including modern slavery, are integrated into their processes.

3 Assessing our potential level of involvement

We use the United Nations Guiding Principles on Business and Human Rights (UNGPs) to understand how modern slavery risk may arise in our business (including our supply networks):

Cause

A company may cause modern slavery if its own activities directly result in modern slavery occurring. For example, if HUB24 directly employed workers but failed to pay them, restricted their freedom of movement, or subjected them to coercion.

Contribute

A company may contribute to modern slavery where its actions or omissions are significant in facilitating, incentivising or encouraging modern slavery. For example, if HUB24 required a supplier to deliver services at unsustainably low cost or within unrealistic timeframes, creating pressure that resulted in exploitative labour practices, HUB24 may be considered to have contributed to that risk.

Directly linked

A company may be directly linked to modern slavery if its operations, products or services are directly linked to modern slavery carried out by another party with which it has a business relationship. For example, if a supplier providing IT hardware to HUB24 sourced components from regions with high prevalence of forced labour.

No involvement

A company may not be linked to a modern slavery impact where the impact occurs outside of its operations, supply chains and business relationships. For example, where modern slavery occurs within a supplier network that has no contractual, commercial or operational connection to HUB24, the company would have no involvement in that impact.

4 Ongoing management of our modern slavery risk profile

The three stages outlined help us identify and assess potential modern slavery risk within HUB24. These risks are managed through our Risk Management Framework and supported by key policies (detailed on p.8).

Identifying and assessing modern slavery risk

Our Policy Framework

Our frameworks and policies provide the foundation for identifying and managing risks across our business and supply chain supporting our human rights commitments. Key policies include:

HUB24 Group Risk Management Framework

Sets out HUB24's approach to identifying, assessing, monitoring and managing risk across the Group.

HUB24 Group Anti-Bribery & Corruption Policy

Sets out HUB24's approach to preventing, detecting and responding to bribery and corruption risks.

HUB24 DBG AML/CTF Program

Sets out HUB24's approach to identifying and managing money laundering and terrorism financing risks.

HUB24 Group Whistleblower Policy

Sets out the standards and processes for reporting and managing concerns about misconduct, unethical behaviour or breaches of laws, policies and procedures.

HUB24 Group Code of Conduct

Sets out the standards, behaviours and expectations for our people in performing their roles and responsibilities.

HUB24 Group Grievance Policy

Sets out HUB24's approach to receiving, assessing and resolving grievances fairly and consistently.

HUB24 Group Work Health & Safety Policy

Sets out HUB24's approach to maintaining a safe and healthy workplace and meeting work health and safety obligations.

HUB24 Group Vendor Management Framework

Sets out HUB24's approach to managing supplier relationships in accordance with our risk appetite, values and regulatory obligations.

HUB24 Advice AFSL Governance Framework

Sets out HUB24's approach to the oversight and governance of advice licensees we contract with.

HUB24 Investment Governance Framework

Sets out HUB24's approach to the onboarding, monitoring and governance of third-party investment products and investment managers, including due diligence, oversight and escalation of investment-related risks.

HUB24 Group Information Security Policy

Sets out the minimum information security requirements expected of suppliers and third-party service providers.

HUB24 Group Donations Policy

Sets out HUB24's approach to managing political and non-political donations.

Identifying and assessing modern slavery risk

Determining our modern slavery risk profile

We apply the UNGPs, together with the modern slavery risk types sourced from Australia's *Modern Slavery Act 2018* (Cth) guidance to our key business operations to determine how modern slavery risk may arise in our business and qour what our modern slavery risk profile is.

The below assessment reflects the Group's exposure to key modern slavery risk types, having regards to:

- The nature of our operating model and workforce
- The extent of control we have over activities (cause, contribute, directly linked)
- Our supplier profile and reliance on third-party and extended supply chains
- Geographic exposure and known industry risk indicators.

The assessment indicates that exposure to modern slavery risk types (including forced labour, human trafficking and forced marriage) arises primarily through indirect linkages in the supply chain, particularly where suppliers may utilise offshore labour or subcontracted service models.

While HUB24's direct supplier relationships are predominantly with Australian-based organisations operating in professional services, financial services and technology sectors, our overall supply chain risk profile is assessed as medium. This reflects the potential for modern slavery risk to arise within extended supply chains where visibility may be limited, including through offshore labour arrangements, subcontracting models and suppliers operating across higher-risk sectors or jurisdictions. As a result, our assessment considers both direct supplier relationships and potential risks that may exist deeper within the supply chain.

The Group currently has limited visibility over extended (Tier 2+) supply chains, and as such the assessment is based on available supplier information and recognised risk indicators, rather than direct evidence of occurrence. This represents an area of ongoing focus.Our assessment of our FY26 modern slavery risk profile on an inherent basis is summarised below:

Identified modern slavery risk types	Our capacity as an employer impacting Our People			Our capacity as a procurer of goods & services			Our Capacity as an Investment Platform, Issuer of Financial Products and Services and as a Service Provider to Third-Party Issuers			Our Capacity as a provider of technology solutions		
UNGP (involvement type)	Cause	Contribute	Directly linked	Cause	Contribute	Directly linked	Cause	Contribute	Directly linked	Cause	Contribute	Directly linked
Deceptive recruiting for labour or services	🟢	🟢	🟢	No	🟢	🟡	No	🟢	🟢	No	🟢	🟢
Slavery	🟢	🟢	No	No	🟢	🟡	No	🟢	🟢	No	🟢	🟢
Forced labour	🟢	🟢	No	No	🟢	🟡	No	🟢	🟢	No	🟢	🟢
Debt bondage	No	No	No	No	🟢	🟡	No	No	🟢	No	🟢	🟢
Human trafficking	No	No	No	No	🟢	🟡	No	No	🟢	No	🟢	🟢
Child labour/ exploitation	No	No	No	No	🟢	🟡	No	No	🟢	No	🟢	🟢
Worst forms of child labour	No	No	No	No	🟢	🟡	No	🟢	🟢	No	🟢	🟢
Forced marriage	No	No	No	No	🟢	🟡	No	No	🟢	No	🟢	🟢
Overall risk profile	Low			Medium			Low			Low		

Identifying and assessing modern slavery risk

Potential modern slavery risk across our business

We assess and manage the risk of modern slavery as it relates to our various roles through our business operations

Modern slavery risk across our value chain

HUB24's Capacity as an Employer (Impacting Our People) — Risk Profile: Low

HUB24 does not consider it is likely to cause or contribute to modern slavery as an employer. As HUB24 operates in Australia, governed by strong employment laws and ethical practices, there is a low risk of modern slavery within our workforce. The HUB24 workforce is employed on a permanent, fixed-term and casual basis. Every employee is issued an individual employment contract, ensuring they are provided with the minimum or above salary and entitlements according Modern to the Banking, Finance & Insurance Award and the National Employment Standards. HUB24 adheres to all Work, Health & Safety legislation and requirements to ensure the safety and wellbeing of our workforce.

HUB24's Capacity as a Procurer of Goods and Services — Risk Profile: Medium

We recognise that HUB24 may be directly linked to modern slavery risk through our supplier relationships. This may include the procurement of goods or services where modern slavery occurs in a supplier's operations or supply chain. It may also include services provided by suppliers, contractors, outsourced providers or offshore service providers where workers are exploited in delivering those services or in related supply chains, particularly workers who may be more vulnerable to exploitation, including temporary visa holders, children and young people, lower skilled workers and other vulnerable workers. This may occur deep in supply chains where HUB24 has limited visibility beyond Tier 1 (direct) contracting relationships.

HUB24's Capacity as an Investment Platform, Issuer of Financial Products and Services and as a Service Provider to Third-Party Issuers — Risk Profile: Low

HUB24's operations encompass both our role as an investment platform, issuer of financial products and services, and service provider to third-party issuers. While our direct exposure to modern slavery risk in this capacity is considered low, we recognise that we may be directly linked to modern slavery risk through investment products available on our platform and administered products.

These risks may arise through the operations and supply chains of investment issuers, fund managers and underlying investee entities, particularly where they operate in higher-risk sectors, industries or geographic regions. While HUB24 does not control the operations or employment practices of these entities, we seek to manage these risks through our investment governance arrangements, due diligence processes and ongoing monitoring activities.

HUB24's Capacity as provider of technology solutions — Risk Profile: Low

Through Class, NowInfinity and HUBconnect, HUB24 provides software, data, administration and compliance solutions to accountants, SMSF administrators, advisers, stockbrokers and other financial services professionals. As a technology and data services provider, our operations are predominantly office-based and supported by a professional workforce within Australia.

Our direct exposure to modern slavery risk is considered low. However, we recognise indirect risks may arise through our supply chain and business relationships, including technology vendors, cloud service providers and outsourced service providers. HUB24 seeks to identify and manage these risks through its supplier due diligence and risk assessment processes.

Identifying and assessing modern slavery risk

Modern slavery risk in our supply network

The inherent risk assessment process of the Group's suppliers considers several indicators of modern slavery risk including sector and industry, the type of products and services, geographical location and specific entity risk. External resources, such as the Global Slavery Index, the Australian Human Rights Commission and the Australian Government's Guidance for Reporting Entities are all used as inputs into this process. Our assessment of our FY26 Modern Slavery Risk Profile, as it applies to our Suppliers, is summarised in the table below:

Risk exposure by:	Rating	Risk Management Comments
Sector/Industry	Medium	The majority of HUB24's suppliers were assessed as operating within the professional and financial services sectors in Australia. While these sectors are generally considered lower risk than industries traditionally associated with elevated modern slavery risk, potential risks may still arise through outsourced service arrangements, offshore operations and broader supply chains. Other supplier categories assessed as having relatively higher inherent modern slavery risk include technology, marketing, travel, staff amenities, and property and operational services. This assessment reflects the nature of the underlying supply chains supporting these services and does not indicate that HUB24 causes or contributes to modern slavery risk through these supplier relationships.
Product/Service	Low	Risks associated with the products and services procured by HUB24 were assessed as low for the period. This reflects the nature of our core supplier base, which predominantly provides technology, software, financial services and professional services. While some of these sectors may present elevated inherent modern slavery risk due to outsourced service arrangements and broader supply chains, the products and services procured by HUB24 are generally not associated with cyclical production processes, labour-intensive manufacturing or high-risk raw material sourcing. HUB24 has limited exposure to suppliers involved in manufacturing, agriculture, extractive industries or other sectors commonly associated with higher modern slavery risk. We therefore assessed the overall product and service risk for our supplier base as low for the reporting period.
Geographic	Low	The majority of suppliers are headquartered in Australia, and as such our geographic exposure risk to modern slavery practices during the period was deemed low. In addition to the countries outlined in the supply chain profile outlined on page 4, we also engage with strategic partners with operations globally, including in countries such as the Philippines and Egypt for example.
Specific Entity	Low	There were no specific entities of both higher geographic and sector risk identified during the period that we deemed to have significant risks associated with modern slavery practices.

CASE STUDY

Supplier deep dive assessment

In FY26, HUB24 conducted an updated supplier risk assessment, recognising the growth of the group over recent periods and opportunity for continuous improvement. The purpose of the assessment was to identify improved supplier and spend insights to better inform HUB24's risk-based approach to managing modern slavery risk in our supply chains.

This review consisted of:

- leveraging recent investments in internal procurement and ESG capability,
- analysing spend data from the Group's accounts payable systems,
- incorporating third party resources such as the Global Slavery Index, the Australian Human Rights Commission and the Australian Government's Guidance for Reporting Entities recommendations to inform inherent risk ratings of suppliers,
- Engaging HUB24's Sustainability Council on the process and findings.

The outcome of this assessment has led to improved supplier and spend visibility, including an updated spend categorisation framework to better reflect inherent risks (as outlined on p.4). We expect to use these insights to further analyse suppliers of relatively higher geographic and sector risk and prioritise engagement where feasible in future periods.

Actions taken to address modern slavery risk

In FY26, HUB24 brought forward the preparation of its Modern Slavery Statement to align with the Group's broader governance and reporting cycle. This reflects the increasing integration of modern slavery risk considerations into HUB24's risk management, supplier governance and broader business operations.

Addressing modern slavery risk across our operations and supply chain relies on close collaboration with suppliers, partners, internal stakeholders, and investment managers. Our approach is structured around a risk-based assessment process, targeted engagement, and continuous improvement.

Supplier due-diligence and assessment

At HUB24, supplier due diligence is undertaken through our procurement, purchasing and third-party risk management processes. These processes support a risk-based review of new suppliers and service providers before engagement, with the level of assessment informed by the nature of the goods or services, supplier criticality, contractual arrangements, geographic exposure and other relevant risk indicators.

Supplier relationships are managed by accountable Business Owners, with support from Procurement, Group Technology and Risk and Compliance where relevant. For technology suppliers and suppliers providing systems, components or services, additional requirements are set out in our Information Security Policy for Supplier Relationships and related technology procurement processes. Where suppliers are engaged under formal contracts, our standard terms include obligations to comply with applicable modern slavery laws, implement reasonable compliance measures and notify HUB24 of any actual breach.

Progress in FY26

- Conducted an updated supplier risk assessment using supply chain and spend data, improving visibility of supplier risk exposures and supporting a more risk-based approach to modern slavery risk management.
- Enhanced supplier data quality and spend categorisation, providing deeper insights into supplier risk profiles across key spend categories and jurisdictions.

Investment manager due-diligence and managed portfolios

Building on enhancements to HUB24's Investment Manager due diligence processes in FY25, our Investment team include a specific modern slavery question as part of its onboarding of managed funds to the HUB24 Platform. This modern slavery consideration seeks to understand the coverage of investment managers that have procedures and controls in place to identify, investigate, and address the risks and instances of modern slavery in the manager's activities. HUB24 expects to use this information in establishing a baseline for investment manager coverage and identify opportunities for risk-based engagement in future periods.

For our range of Managed Portfolios, HUB24's template contract terms were previously updated to contain modern slavery clauses for new portfolio managers.

Training and awareness for employees

HUB24 has a dedicated modern slavery module as part of its annual mandatory training for all employees. This training helps employees understand what modern slavery is, how to recognise risks, educates them on the appropriate steps for reporting suspected cases and tests knowledge with a short test. This training is an essential part of our compliance framework and is designed to ensure employees understand our policies and the measures we take to mitigate modern slavery risk.

In FY26, this module was reviewed and found to be appropriate given the Group's risk profile, with an opportunity to update test questions. The completion rate of this training was 100% for the reporting period.

Progress in FY26

- Reviewed the annual mandatory modern slavery training module and updated employee assessment questions to reinforce awareness of modern slavery risk indicators, reporting pathways and individual responsibilities.

Advice licensee governance

In FY26, HUB24 strengthened its advice governance capability through the appointment of a dedicated Head of Advice Governance. Advice licensees are subject to due diligence during onboarding and ongoing monitoring throughout their relationship with HUB24, including risk assessments, compliance attestations, review of identified risk indicators and governance oversight through established escalation and reporting processes. As part of this framework, all advice licensees complete an annual compliance attestation that includes modern slavery-related declarations, while LRAs incorporate contractual provisions relating to modern slavery. These measures support the identification, assessment and management of modern slavery risk across HUB24's advice network and promote ongoing awareness and accountability among participating licensees.

Actions taken to address modern slavery risk

Financial Crime and Compliance

HUB24 and its business activities are subject to a range of financial crime laws and regulations, including anti-money laundering and counter-terrorism financing (AML and CTF) as well as restrictions relating to sanctions and other criminal activity.

We have processes in place that screens transactions and compares the identifying details of our customers against intelligence lists of sanctioned persons and people convicted of crimes, such as human trafficking. The transaction monitoring capability uses algorithms to identify unusual transactional patterns (for example as might be adopted by people convicted of crimes such as human trafficking) that require further investigation and escalation to regulators.

Industry Engagement and collaboration

Given the complexity of modern slavery, HUB24 recognises the importance of collaboration and enhancing practices in addressing risks across our Industry. We are members of several key bodies that have working groups dedicated to progressing Sustainability and Environment, Social and Governance (ESG) practices, including human rights and modern slavery. Key memberships for FY26 included:

- Financial Services Council (FSC)
- United Nations Global Compact Australia (UNGCA)
- Responsible Investment Association of Australasia (RIAA)
- The Association of Superannuation Funds of Australia (ASFA)

Grievance mechanisms and remediation

HUB24 provides mechanisms for employees, contractors and other eligible stakeholders to raise concerns, complaints and potential human rights issues, including matters that may relate to modern slavery. Concerns are assessed and managed through appropriate governance processes, including HUB24's Incident and Breach Management Framework, grievance handling procedures and whistleblower channels.

- **Our People**

  HUB24's Employee Grievance Handling Policy and Whistleblower Policy provide employees and contractors with mechanisms to raise workplace concerns, grievances, inappropriate behaviour, misconduct or potential breaches of company policies. These policies are underpinned by principles of fairness, confidentiality, dignity, respect and protection from detriment.

- **Suppliers and Other External Stakeholders**

  HUB24's Whistleblower Policy provides a confidential channel for eligible individuals, including current and former employees, contractors, suppliers and their employees, to report concerns relating to misconduct or improper conduct. The policy is designed to ensure disclosures can be made safely and that individuals are protected from detriment and supported throughout the process.

Progress in FY26

- Updated the Group Whistleblower Policy to more clearly align with modern slavery compliance expectations, reinforcing HUB24's commitment to ethical business practices and the protection of human rights across its operations and supply chains.
- Enhanced the policy to provide greater clarity on the reporting and escalation of concerns that may relate to modern slavery, human rights issues or other forms of inappropriate conduct.
- Further strengthened HUB24's approach to psychosocial risk management by enhancing its psychosocial hazard framework, supporting tools and training, and commencing psychosocial hazard risk assessments across all teams to help identify and address workplace risks and support employee wellbeing.

Remediation

Where a modern slavery concern is identified, HUB24 will assess the circumstances of the matter, investigate the potential impact, consider engagement with relevant suppliers or business partners, and seek to support appropriate remediation outcomes for affected individuals where possible. HUB24 would also review the effectiveness of existing controls and implement corrective actions as required.

In FY26, and since the commencement of the Modern Slavery Act 2018 (Cth), HUB24 has not identified any instances of modern slavery through its grievance handling processes, Incident and Breach Management Framework or whistleblower channel.

UN GLOBAL COMPACT

WE SUPPORT

Supporting the United National Global Compact

HUB24 remains a signatory to the United Nations Global Compact, which cover human rights, labour, environment and anti-corruption. In FY26, we reaffirmed our commitment to embedding these principles into our strategy, culture and daily operations, and to engaging in collaborative initiatives that support the United Nations' broader development agenda, including the Sustainable Development Goals (SDGs).

View more information.

Governance and risk management

HUB24 is committed to high standards of corporate governance and risk management, adopting the ASX Corporate Governance Principles and Recommendations (4th Edition). Our governance arrangements are set out in our Corporate Governance Statement, and our approach is detailed in our annual Sustainability Report.

At the commencement of the reporting period to 30 April 2026, the Board had two standing Committees established to assist with the discharge of its responsibilities:

- Audit, Risk and Compliance Committee ('ARCC'), and
- Remuneration and Nomination Committee ('R&NC').

The Board considered its Committee structures and determined to replace the ARCC with an Audit Committee and a Risk Committee, and the R&NC with a Nomination Committee and a People and Culture Committee, effective 1 May 2026. These changes are designed to enable greater focus in each Committee's areas of responsibility and to increase capacity in light of the Group's growth.

Modern Slavery is considered by the Board, its Committees, and management as outlined below.

Board Oversight

HUB24 Limited Board

Reviews and approves HUB24's Modern Slavery Statement, oversees performance, governance frameworks, and culture.

HUB24 Risk Committee

Oversees the Risk Management Framework, modern slavery risk management and recommends the Modern Slavery Statement for Board approval.

Management and execution

Executive Leadership Team

Accountable for modern slavery risk management within their business lines under the Risk Management Framework (RMF).

Sustainability Council

Oversees HUB24's approach to sustainability and modern slavery. The Council works to embed sustainability considerations across operations and monitors progress against the Group's sustainability and human rights goals.

Chief Financial Officer (CFO)

Responsible for procurement and sustainability initiatives across the business, including oversight of the Group's supplier expense management policies and procedures and the Vendor Management Framework.

Chief Risk Officer (CRO)

Responsible for the Risk Management Framework (RMF), which underpins the risk management approach to Modern Slavery.

Chief People Officer (CPO)

Responsible for people-related policies and practices, including remuneration frameworks, employment contracts, workplace health and safety and employee wellbeing. The CPO also oversees recruitment processes and the engagement and oversight of recruitment and workplace service providers to support ethical employment practices across the Group.

Our People

Responsible for identifying, assessing and escalating risks as part of daily operations.

Governance and risk management

Our Risk Governance

HUB24's Board approved Risk Appetite Statement (RAS) and Risk Management Framework (RMF) define the Group's approach to managing risk. These documents ensure the alignment of risk management practices with the Group's strategic objectives, emphasising the importance of addressing modern slavery risk at every level of the organisation.

The RMF is built around seven key components, designed to provide a comprehensive and structured approach to risk management. It aligns with leading industry standards, such as APRA's Prudential Standard CPS 220 Risk Management and the International Standard ISO 31000 Risk Management – Guidelines. At the core of HUB24's framework is a commitment to acting in the best interests of our customers. By proactively managing risks, we aim to deliver fair and effective outcomes that uphold our values and build trust.

To strengthen risk oversight, HUB24 uses a Board-approved Risk Taxonomy to classify and categorise material risks. Sustainability risk, which includes human rights and modern slavery risk, is recognised as one of the Group's twelve material risks. This recognises its potential impacts on the organisation and ensures that it prioritised and addressed effectively.

The Chief Risk Officer (CRO) plays a pivotal role in overseeing the management of modern slavery risk. This involves embedding our organisation's risk governance and ensuring robust strategies are implemented to mitigate them. Each Group Executive is accountable and responsible for managing modern slavery risk within their area of responsibility in accordance with the RMF.

Our Approach to Risk Management

HUB24 adopts the Three Lines of Accountability model to clearly define roles and responsibilities in managing risk. This model empowers all Our People to understand their role in risk management (see table below). The Managing Director and Group Executive are accountable for implementing the Group's strategy and managing impacts on its risk appetite and profile. Supporting them, the Group Risk & Compliance function provides independent monitoring, assessment, and insights to ensure effective governance and decision-making.

Three Lines of Accountability	Responsibilities
Internal Audit	• Audit is the Third Line assurance function that provides the Board and the Group Executive with an independent evaluation of the adequacy and effectiveness of the Group's governance, risk management and control environment.
Group Risk & Compliance	• The Second Line sets frameworks, policies and standards for use across the Group and can require the cessation or modification of an activity where these are not followed. • The Second Line also reviews First Line activities and decisions that may materially affect HUB24's risk position and independently evaluates the effectiveness of the First Line's management of risk including controls. • The Second Line provides insight to the First Line, assisting in developing, maintaining and enhancing the first line's approach to risk management and consider and reports on the Group Risk Profile.
Business Units	• The First Line proactively identifies, evaluates, owns and manages the existing and emerging risks in their business. It manages business activities within approved risk appetite and policies. • In managing its risk, the First Line establishes and maintains appropriate governance forums and controls to ensure issues and risk are monitored and/or escalated.

Assessing our effectiveness and performance

Assessing the effectiveness of our actions is critical to driving continuous improvement in our approach to modern slavery risk. HUB24 has identified several metrics to assist in tracking our performance across our key activities.

While our current effectiveness measures focus on employee awareness, training and reporting mechanisms, we recognise the opportunity to further enhance supplier-focused metrics. Future measures may include supplier risk assessment outcomes, due diligence activities undertaken and engagement with suppliers assessed as higher inherent risk.

We monitor Advice Licensee compliance attestations, modern slavery training completion rates, as well as any matters raised through our grievance channels as indicators of the effectiveness of our response to anti-modern slavery.

Effectiveness measure	FY2025	FY2026
Our People [1]		
Completion rate for Modern Slavery Awareness module by HUB24 employees	100%	100%
Completion rate for Whistleblower Protection training by HUB24 employees	100%	100%
Reported incidents of modern slavery through internal employee grievance channel	0	0
Our Operations, Partners, & Customers		
Reported incidents of modern slavery through incident & breach reporting	0	0
Reported incidents of modern slavery through the whistleblower process	0	0
Exceptions identified in annual Advice Licensee compliance attestations related to Modern Slavery risk	0	0

1. Mandatory training covers all HUB24 employees, including permanent and fixed term contractors and casuals. The percentage completion figure includes all employees who completed training in the previous 12 months by their due date and excludes employees on extended leave and new starters with one month or less tenure.

Continuous improvement and future focus

We aim to continuously review and enhance our approach to managing modern slavery risk in our operations and supply chain where we have reasonable control. We have identified the following continuous improvement initiatives to help drive meaningful change:

Continuous improvement initiatives

- **Training:** Deliver targeted training to relevant business areas to strengthen awareness of modern slavery risk, indicators and escalation pathways.
- **Risk Management:** Develop and embed modern slavery Key Risk Indicators (KRIs) within the Risk Management Framework to support ongoing monitoring and reporting to the Risk Committee.
- **Investment managers:** Continue to mature our approach to assessing and managing modern slavery risk within investment manager due diligence and oversight processes.
- **Supplier engagement:** Enhance supplier due diligence activities across higher-risk categories, strengthen cross-functional collaboration, and implement a Supplier Code of Conduct to clearly articulate expectations and support supplier accountability.
- **Industry engagement:** Continue to participate in industry forums and relevant policy consultations to monitor emerging developments and contribute to better practice outcomes.

Consultation & Approval

The HUB24 Group Chief Risk Officer, supported by the HUB24 Group Risk & Compliance function, led the preparation of this Statement. The Group Risk & Compliance function consulted cross-functionally in the preparation of this Statement, including with relevant members of the HUB24 Group Executive and directors of HUB24 Custodial Services Ltd, a reporting entity under the Modern Slavery Act 2018 (Cth).

This Joint Modern Slavery Statement was approved by the Board of HUB24 Limited on 14 August 2026 on behalf of HUB24 Limited and HUB24 Custodial Services Ltd in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

Appendix A – Reporting entities and subsidiaries

This Joint Modern Slavery Statement has been prepared in accordance with section 14 of the *Modern Slavery Act 2018* (Cth) and covers the following reporting entities for the year ended 30 June 2026:

- HUB24 Limited (ABN 87 124 891 685)
- HUB24 Custodial Services Ltd (ABN 94 073 633 664)

The subsidiaries of HUB24 during FY26 included

HUB24 Management Services Pty Ltd	Operating entities
HUB24 Administration Pty Ltd	Operating entities
HTFS HoldCo Pty Ltd	Operating entities
Firstfunds Pty Ltd	Operating entities
HUBconnect Pty Ltd	Operating entities
Agility Applications Pty Ltd	Operating entities
Xplore Wealth Pty Ltd	Operating entities
Investment Administration Services Pty Limited	Operating entities
Margaret Street Financial Holdings Pty Ltd	Operating entities
Margaret Street Administration Services Pty Ltd	Operating entities
Margaret Street Promoter Services Pty Ltd	Operating entities
Myhub solutions Pty Ltd	Operating entities
HUB24 Limited Employee Share Trust	Operating entities

Class Pty Limited	Operating entities
Class Technology Pty Ltd	Operating entities
Class Investment Reporter Pty Ltd	Operating entities
NowInfinity Pty Ltd	Operating entities
NowInfinity 3505 Pty Ltd	Operating entities
myprosperity Pty Ltd	Operating entities
myprosperity Aust Pty Ltd	Operating entities
DIY Master Pty Ltd	Non-operating entities
HUB24 Services Pty Ltd	Non-operating entities
Margaret Street Attorney Services Pty Ltd	Non-operating entities
myprosperity UK Pty Ltd	Non-operating entities
Xplore Business Services Pty Ltd	Non-operating entities
Planner Holdings Pty Limited	deregistered in FY26
PHL Securities Pty Ltd	deregistered in FY26
Topdocs Pty Ltd	deregistered in FY26

Please refer to Page 100 of the HUB24 Annual Report year ending 30 June 2026 for further details of the owned and controlled entities within the HUB24 Group.

Appendix B – How our statement addresses the mandatory criteria

The table below provides reference pages for the relevant disclosures in each criterion for the *Modern Slavery Act 2018* (Cth).

Australian Modern Slavery Act (Cth) mandatory criteria	FY26 Modern Slavery Statement section reference
Section 16(1)(a) Identify the reporting entity	Introduction
Section 16 (1)(b) Describe the structure, operations, and supply chains of the reporting entity	Our structure, operations, and supply chains
Section 16 (1)(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Identifying and assessing our modern slavery risk
Section 16 (1)(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Actions taken to address modern slavery risk Identifying and assessing our modern slavery risk
Section 16(1)(e) Describe how the reporting entity assesses the effectiveness of such actions	Assessing the effectiveness
Section 16(1)(f) Describe the process of consultation with any entities that the reporting entity owns or controls. In the case of a reporting entity covered by a statement under section 14 -the entity giving the statement	Consultation & Approval
Section 16(1)(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Continuous improvement and future focus

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