Modern Slavery Statement

Statement Owner: ReFresh OS Pty Ltd **Effective Date:** 22 May 2026 **Reporting period:** FY2025-26

Reporting status

ReFresh OS Pty Ltd (ACN 687 813 832) does **not currently meet the AUD 100 million consolidated revenue threshold** that triggers mandatory reporting under the *Modern Slavery Act 2018* (Cth). This statement is therefore voluntary. ReFresh intends to publish a Modern Slavery Statement annually whether or not the mandatory threshold applies, to evidence the company's commitment and to satisfy enterprise customer due diligence expectations.

If the Australian Government reduces the threshold (as recommended by the 2023 statutory review), this statement will be amended to a mandatory statement and lodged with the Modern Slavery Register accordingly.

About this statement

This statement is made by ReFresh OS Pty Ltd in respect of the financial year ended **30 June 2026**. It describes the steps ReFresh has taken during the period to identify and address the risks of modern slavery in its operations and supply chains.

This statement also operationalises ReFresh's contractual obligations under §31 of the customer Terms and Conditions (refresh.tech/legal/terms-and-conditions), which commits ReFresh to: comply with applicable Modern Slavery Laws (§31.1); represent that it has not been convicted of and is not subject to investigation under those laws (§31.2); implement and maintain policies and procedures designed to ensure compliance, including supplier and subcontractor due diligence and appropriate training (§31.3); maintain compliance records (§31.4); notify customers promptly of any actual or suspected modern slavery in its operations or supply chain (§31.5); and provide reasonable assistance to support customer compliance (§31.6).

ReFresh confirms each of these representations on the date of this statement.

The reporting entity

Field	Value
Legal entity	ReFresh OS Pty Ltd
ACN	687 813 832
ABN	17 687 813 832
Registered office	28 Pearl Bay Avenue, Mosman, New South Wales 2088, Australia
Structure	Private proprietary company limited by shares
Industry	B2B Software-as-a-Service — psychosocial workplace safety management
Customers	Australian organisations across industry sectors
Jurisdictions of operation	Headquartered in Australia; platform architecture supports EU, US, NZ, SG, CA — currently activated in Australia

Our operations

ReFresh operates a SaaS platform that helps employers identify, assess and manage workplace psychosocial hazards. We employ a small team in Australia, with a roadmap to additional engineering and customer-facing hires as growth allows. We do not operate physical infrastructure, manufacturing facilities, retail outlets, or transport networks.

The core operational footprint:

- Software engineering, product, design, customer success and go-to-market functions
- Cloud-hosted SaaS delivered from AWS (Sydney)
- Office space in Sydney (or distributed remote work arrangements)
- Standard corporate functions (finance, legal, people)

Our supply chain

ReFresh's supply chain is predominantly software and professional services, sourced from established, regulated providers in lower-risk jurisdictions. The material categories are:

Category	Examples	Modern slavery risk assessment
Cloud infrastructure	AWS, Cloudflare	**Low** — large public listed companies with mature ESG/human rights programs
SaaS tools	Vanta, incident.io, JumpCloud, GitHub, Google Workspace, Attio, Stripe, FusionAuth Cloud, Neon, Granola, Fireflies	**Low** — established providers, public reporting in their home jurisdictions
Professional services	Auditors, lawyers, accountants, consultants, insurance brokers	**Low** — regulated professions in Australia
Office	Coworking facility / managed office	**Low** — providers operating under Australian law
IT hardware	Laptops, peripherals	**Low-Medium** — supply chain extends to electronics manufacturing, including in higher-risk jurisdictions
Marketing	Conferences, design, advertising	**Low**

The hardware category (laptops, accessories) is the highest residual modern-slavery risk area. ReFresh purchases through major Australian distributors of OEMs (Apple, Dell, Logitech) who each publish their own modern slavery statements and supply-chain transparency reports.

Risks identified

Across operations and supply chain, the residual modern-slavery risks identified during the period are:

Risk area	Residual rating	Mitigation
Workforce — our own staff	Very low	Australian-employed staff under written contracts; minimum wage compliance; written rosters; whistleblower channel; safe-work obligations

Software supply chain	Low	Major established vendors with their own modern slavery statements and supply-chain controls; sub-processor list reviewed annually
Hardware supply chain (laptops, peripherals)	Low to Medium	Purchase through distributors of OEMs that publish modern slavery statements; preference for refurbished where viable; small purchasing volume limits exposure
Professional services	Very low	Local, regulated providers
Office	Very low	Managed-office provider operates under Australian law

Actions taken during the reporting period

During FY2025-26, ReFresh:

1. **Adopted this voluntary Modern Slavery Statement** and the Modern Slavery & Ethical Sourcing standards within the Third-Party Management Policy
2. **Reviewed sub-processor list** and confirmed each material vendor publishes a modern slavery statement (where in scope of their own jurisdiction's law)
3. **Added modern-slavery awareness** to staff Code of Conduct training
4. **Added a modern-slavery question** to the vendor onboarding security questionnaire for Tier 1 and Tier 2 vendors
5. **Updated the Whistleblower Policy** to make explicit that concerns about exploitative labour conditions — at ReFresh or in our supply chain — are eligible disclosures attracting full protections
6. **Made the Procurement function responsible** for assessing modern-slavery risk on any new vendor engagement and recording it in the Vendor Registry

Assessment of effectiveness

ReFresh assesses the effectiveness of these actions through:

- Annual review of the modern-slavery question responses received from vendors during onboarding and re-attestation
- Annual review of any whistleblower reports relating to exploitative labour conditions (zero in the reporting period)
- Review of supplier modern slavery statements during the annual third-party review under the Third-Party Management Policy
- Tracking of training completion

No findings of modern slavery or material exploitative labour risk were identified during the reporting period.

Process of consultation

ReFresh does not have controlled entities subject to consultation requirements. The Board has been consulted on this statement and approves it.

Board approval

This statement was approved by the Board of ReFresh OS Pty Ltd on **22 May 2026**.

Signature	
Name (CEO)	Harrison Kennedy

Date	22 May 2026

Notification undertaking (T&C §31.5)

If ReFresh becomes aware of any actual or suspected modern slavery in its operations or supply chain, the CEO will notify affected customers promptly per the contractual undertaking in T&C §31.5, and will cooperate in good faith with the customer's investigation and response.

Future commitments

ReFresh commits to:

- Continuing to publish a Modern Slavery Statement annually, irrespective of mandatory reporting status
- Re-assessing supply-chain risk and the effectiveness of mitigations each year
- Adopting a mandatory-form statement and lodging it with the Modern Slavery Register if and when ReFresh either crosses the consolidated revenue threshold or is brought into scope by a lowered threshold
- Strengthening procurement controls as the company grows, in particular for hardware sourcing

Applicable laws, regulations and standards

- *Modern Slavery Act 2018* (Cth) — voluntary statement at current scale
- *Modern Slavery Act 2018* (NSW) — operative provisions limited; largely superseded by the Commonwealth Act, with the NSW Anti-Slavery Commissioner continuing in operation
- *Fair Work Act 2009* (Cth)
- UN Guiding Principles on Business and Human Rights
- ILO Fundamental Conventions
- Customer Terms and Conditions §31 (Modern Slavery)

Version history

Version	Date	Description	Author	Approver
1.0	22 May 2026	Initial policy	Taylor Laing	Harrison Kennedy