Modern Slavery Statement

Introduction

This document is a Modern Slavery Statement (Statement) issued by Puzzle Partners Consulting Pty Ltd, (Puzzle).

This Statement is voluntary as Puzzle is not required to comply with the Act in respect of the financial year to which the Statement relates. This Statement is not published on the Australian Government's Modern Slavery Register website (https://modernslaveryregister.gov.au).

This Statement outlines our commitment, and steps taken, to identify and address modern slavery risks within our business and supply chain to address the requirements of the Act.

About us

Founded in 2003, Puzzle is a privately owned company and is one of Australia's leading workplace consultancies. We specialise in change management, communication and design, behavioural science, organisational change, strategy, and transition.

Puzzle recognises that modern slavery is a crime and a violation of fundamental human rights, and as such, adopts a zero tolerance policy to all forms of modern slavery, human trafficking, all forms of servitude, and forced and compulsory labour within its business and supply chain.

Our Structure, Operations and Supply Chain

Puzzle is a family owned Private Company registered in Australia (ABN 69 107 246 926) and does not own or control other entities. Headquartered in Sydney, Puzzle employs less than 30 people, all located in Australia. Our business is people intensive, not capital intensive with a low level of purchases from third parties; our workforce accounts for around 75% of our expenses.

Puzzle is engaged exclusively in workplace consulting and serves as a trusted advisor and strategic partner to our clients across multiple sectors, including within Australia's top 100 companies, and federal, state and local government agencies.

As a small, consulting business Puzzle has a relatively simple supply chain. The external vendors we procure goods and services from fall primarily into four broad categories:

- **Professional and employee related services:** legal, tax, audit/accountancy advice, external training and recruiting providers, employee insurance and other providers.
- **Workplace services:** services that support the running of our day-to-day business (e.g., cleaning, catering, office equipment maintenance services, office supplies and the leasing of our office spaces).
- **Technology and data services:** systems, software and hardware purchased to provide the technology infrastructure required to undertake our business, and IT support services.
- **Travel services:** as an organisation serving clients across Australia, our staff undertake travel; including occasional overseas travel for professional development, speaking engagements etc.

Our goods and services are sourced and procured in Australia, with the majority sourced from Australian-based suppliers and contractors.

Risks of Modern Slavery Practices in Operations and Supply Chain

Given the nature of our business, the likelihood of causing, being linked to, or contributing to modern slavery is negligible. Nonetheless, we remain vigilant and proactive in ensuring that our practices and those of our partners align with our values of integrity and respect for human rights.

Puzzle fosters a corporate culture and environment that empowers our people and consults with them on key matters encouraging open, respectful two-way communication. We provide fair remuneration, are an equal opportunity employer and advocate mutual respect between employees and management.

Our supply chain predominantly consists of goods and services that support our people to deliver consultancy services, including the physical premises we occupy, facilities we use (photocopiers, office supplies, etc), insurers, maintenance contracts, software licences and IT infrastructure.

We consider there is minimal risk to Puzzle being directly linked to modern slavery practices given our supply chain profile. However, Puzzle acknowledges that some of our goods and services may be indirectly procured from third parties whose employees are from vulnerable geographical locations or low social economic backgrounds.

We believe that the most vulnerable sectors within our supply chain are likely to be cleaning and security services provided by landlords or building managers, and technology hardware provider who may source parts from developing countries or countries where the risk of modern slavery is higher.

As part of our services, we may also procure physical relocation related services on behalf of our clients when they are moving premises. We recognise that the risks of modern slavery may exist within this industry given the transient nature and composition of its workforce, including migrants, those from low social economic backgrounds etc. We also acknowledge that Puzzle's reputation may be impacted if any of these service providers are associated with, or participate, in modern slavery practices.

Actions Taken to Assess and Address Risks

Policies and Procedures

Puzzle is committed to incorporating socially and environmentally sustainable behaviour into everything we do, including sound governance and engagement with our employees, our community, and our environment. We utilise our procurement practices and employment policies to help mitigate the risks of slavery and human trafficking in our business.

We treat our employees with dignity and respect and adhere to all applicable industrial relation laws and the National Employment Standards. We utilise our employment policies to help mitigate the risks of slavery and human trafficking in our business. These policies and procedures include:

- Code of Conduct Policy
- Complaint Procedure
- Corporate Social Responsibility Statement
- WHS Management Policy & Manual
- Workplace Discrimination, Harassment & Bullying Policy

Supply Chain

As part of our formal procurement process when seeking relocation related services, Puzzle requests that a potential supplier provide information about how it has identified and assessed modern slavery risks within its business or its supply chain, as well as mitigation actions it has taken to prevent or remediate these risks.

The answers provided by the potential supplier are used as part of the formal evaluation process, and help our clients make an informed decision about which supplier to engage, and whether they wish to undertake remediation discussions, impose contract conditions etc.

Consultation Process

As there are no subsidiaries or entities owned or controlled by Puzzle, this requirement is not applicable.

Other Relevant Information

This Statement will be reviewed annually and updated as necessary.

Approval



Name: Katherine Divett

Title: Chief Executive Officer

Dated: 31 October 2026