Gentrack Group Ltd
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Gentrack Group Limited Modern Slavery Statement
For the year ended 30 September 2025

This statement is made on behalf of Gentrack Group Limited ("Gentrack" and together with its subsidiaries, the "Gentrack Group") for the financial year ending 30 September 2025. It has been prepared pursuant to the requirements of the UK Modern Slavery Act 2015 and Australian Modern Slavery Act 2018 and in accordance with the legislation pursuant to the locations Gentrack Group operates within.

This statement was approved by the Gentrack Group Limited Board (including its subsidiaries) on 17 February 2026.



Andy Green, CBE
Chairman

Introduction

Gentrack Group is a global software and services business with operations and customers across Europe, North America, Middle East, and Asia-Pacific. We are committed to upholding human rights and ensuring that all business is conducted according to ethical, professional, and legal standards in a fair, honest, and open manner. The Gentrack Group is dedicated to conducting its business and all its relationships based on integrity and respect.

Our Business

For the financial year ending 30 September 2025, Gentrack was a New Zealand public company limited by shares and listed on the New Zealand Stock Exchange (NZX) and Australian Stock Exchange (ASX). A New Zealand incorporated company, its principal corporate office is in Auckland, New Zealand, with corporate offices during the reporting period in other countries including United Kingdom, Singapore, India, and Australia. Gentrack owns various subsidiary companies, including:

- Gentrack Limited (New Zealand)
- Gentrack Group Australia Pty Limited (Australia)
- Gentrack Pty Limited (Australia)
- Gentrack UK Limited (United Kingdom)

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- Gentrack Holdings (UK) Limited (United Kingdom)
- Gentrack (Singapore) Pte Ltd (Singapore)
- Gentrack Software Private Limited (India)
- Veovo Group Limited (New Zealand)
- Veovo Holdings Denmark AS (Denmark)
- Veovo AS (Denmark)
- Veovo Inc (United States of America)
- Veovo NZ Limited (New Zealand)
- Veovo UK Limited (United Kingdom)
- Veovo IP Limited (New Zealand)
- Gentrack Information Systems Technology Company (Saudi Arabia)
- Gentrack France SAS (France)

Our Operations

Gentrack Group provides leading utilities across the world with innovative technology solutions. Our main business activities include billing, CRM, collections, and meter data management solutions for energy, water, and airport utility companies, as well as software to enable airports to run more efficiently. We employ over 800 people worldwide, predominantly utility software experts, with the majority employed in New Zealand, Australia, India, and the United Kingdom. The services we procure are predominantly provided in New Zealand, Australia, UK & Europe, and the goods we procure are manufactured across the world, including the United States, Europe, and Asia.

Our Supply Chains

Our supply chain relationships include suppliers from the following sectors:

- Information, communications, and technology
- Property services (including facilities management, utilities, cleaning, waste management, and security)
- Consulting and contracting services
- Marketing, including print and marketing services
- Office supplies

Our Values, Policies, and Governance

Our values drive decisions and how we interact with our customers, partners, shareholders, and each other. We have a policy framework in place that is designed to incorporate the Gentrack Group values and commitments. Together with the Gentrack

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Modern Slavery Policy ("Policy") and internal frameworks and procedures, are included the following commitments:

- Gentrack Group, through its recruitment programme and people management activities, has processes in place that are designed to prevent and detect modern slavery and human trafficking. Gentrack Group's programme in this regard contains the following elements:
    - The Policy articulates Gentrack Group's commitment to preventing violations of the United Kingdom Modern Slavery Act 2015 within its operations and supply chain as well as the Australia Modern Slavery Act of 2018;
    - Communication of the Policy and all relevant elements of the programme to all employees throughout Gentrack Group and to our business partners and supply chain;
    - The assessment of modern slavery and human trafficking risks within the Gentrack Group and its supply chain and the development of effective, efficient, and transparent controls to reduce exposure to those risks;
    - The adoption of appropriate due diligence on business partners, agents, contractors, consultants, subcontractors, and suppliers coupled with a requirement to incorporate the principles of the United Kingdom and Australia Modern Slavery Acts of 2015 and 2018 respectively; and
    - Education of all relevant individuals throughout the company so that compliance with its policies and procedures is a duty of all relevant employees at all levels and so that individuals can recognize and take steps to report and avoid the same.
- While the Policy was initially introduced in response to the UK Modern Slavery legislation and updated to include the Australia Modern Slavery legislation, it applies to all directors, officers, and employees of the Gentrack Group.
- All employees are invited to comment on the Policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the Gentrack Group's People Experience team.
- In addition to the Policy, there is a Code of Conduct which serves as a guide for how Gentrack Group people conduct themselves in all aspects of their business.
- Other complementary policies include:
    - Risk Management Policy
    - Health and Safety Policy
    - Contract Management Policy

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Risk Assessments

We have a zero-tolerance approach to all forms of modern slavery and human trafficking within our business. Accordingly, risk assessments have identified the following areas that may pose risks:

Labour Risks

These include violations of labour rights, such as forced or compulsory labour, inadequate wages and benefits, excessive work hours, and the use of child labour. In response, mitigations include:

- A remuneration policy and governance framework which ensures equitable wages and benefits for all Gentrack Group employees
- Ensuring contracted labour is paid in accordance with industry benchmarks in the relevant location
- A contractual requirement on third parties to comply with all relevant legislation

Product and Services Risk

While services are considered to be a low-risk area for Gentrack Group, we are introducing a new Supplier Code of Conduct to help with due diligence and ongoing monitoring of supplier practices to identify any areas of concern is undertaken as part of our customer engagement model. It is acknowledged that supply chains are far-reaching and therefore visibility is not possible over all areas which may involve modern slavery risks. However, we incorporate environmental, social, and ethical considerations into our supplier selection process.

Effectiveness of Our Approach

The vast majority of our operations, people, and customers are located in countries with strong labour, employment, and anti-corruption legislation, which means there is a lower risk of modern slavery than may otherwise be the case. However, we will continue to approach this with our zero-tolerance approach and monitor and evolve policies and approaches as appropriate.

We encourage direct dialogue with our colleagues and conduct annual engagement surveys for feedback. Monthly and Quarterly Business Reviews ensure effective and commercial financial management and risk reviews at a Group level including good governance and compliance. We operate in accordance with the local legislation employment law in all applicable countries, including compliance with required consultation; one-to-one or collective, as appropriate, for any organisational changes. Gentrack Group is committed to taking meaningful action to identify, mitigate, and manage any modern slavery risks and to continuously improving our approach.

Consultation with Related Entities

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All entities owned or controlled as part of Gentrack Group operate under a suite of common policies and programs, including the Policy. We consult with our Executive team regularly to review and evolve our policy based on customer feedback obtained from tenders and from employees in our various subsidiaries. As mentioned above, we engage regularly with our colleagues in all companies in the Gentrack Group using engagement surveys for feedback.

Continuous Improvement

We are dedicated to continuous improvement in our approach to modern slavery. Our policies are housed on a central intranet, allowing for employee engagement, comments, and continuous improvement. Additionally, we ensure our policies undergo regular legal review to reflect the latest legislation and best practices across our global footprint.