Qoria

2025 Modern Slavery Statement

About this statement

This statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) (Act) on behalf of Qoria Limited (ABN 33 167 509 177) (Qoria). References to 'we', 'us', 'our' and 'the Group' are references to Qoria and its subsidiaries.

The Act requires businesses operating in Australia that met the $100m consolidated revenue threshold during a financial reporting period to describe the risks of modern slavery in their operations and supply chains and the actions they have taken during the reporting period to assess and address those risks.

This statement is Qoria's inaugural report covering the financial year ending 30 June 2025.

The table below sets out the mandatory reporting requirements in the Act and where each has been addressed within this statement.

Mandatory reporting requirements	Location
Identify the reporting entity and describe its structure, operations and supply chains.	Part 1
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Part 2
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.	Part 3
Describe how the reporting entity assesses the effectiveness of these actions being taken to assess and address modern slavery risks.	Part 4
Describe the process of consultation with any entities the reporting entity owns or controls.	Part 5

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1. Qoria's Structure, Operations, and Supply Chains

Structure & operations

Qoria is an Australian publicly listed company (ASX: QOR). Its registered office and principal place of business is Level 3, 45 St Georges Terrace, Perth WA 6000, Australia.

Qoria is a technology company operating in child digital safety, parental control and school safety solutions. Products include cloud-hosted software platforms, devices integration and education/training programmes.

We operate globally under the following brands:

Linewize (North America)

Helping schools, students and families develop better digital habits with the most comprehensive solutions in North America.

Linewize (New Zealand)

Helping schools and their communities raise the bar in student digital wellbeing to levels never before seen.

Linewize (Australia)

Working with schools to transform student wellbeing and learning outcomes.

Smoothwall

A pioneer in digital safeguarding solutions for schools, Smoothwall has been the UK market leader for over two decades.

Qustodio

Over 8 million parents trust Qustodio's parental control tools to keep their kids' screen time safe and balanced.

ySafe

ySafe's award-winning team provides cyber safety education and support to schools across Australia.

The Qoria ecosystem is a platform from which cyber safety settings, advice, and support can be delivered across any network and any device – offering a universal approach to cyber safety at home, at school and anywhere in between. The innovation of the Qoria ecosystem is that it not only supports the needs of schools and parents but also that it also permits telecommunication service providers and device manufacturers to embed world's-best practice cyber safety into their offerings.

The principal activities of the Group during the year have been continued sales and distribution, marketing and customer support of its suite of cyber safety products and services. There have been no other significant changes in the nature of these activities during the financial year.

We have global reach and local presence. It allows us to maximise the availability of our solutions whilst meeting the unique needs of the schools and communities we serve. The map below shows our locations around the world.

Qoria employs around 600 people working across 10 countries, looking after 32,000 schools, supporting 8 million parents and helping to keep 27 million children safer than they were before.

Our employees perform a variety of roles within the following departments:

- Customer Support and Delivery – providing comprehensive assistance to our customers.

- Engineering – responsible for designing and delivering exceptional software solutions.

- Security, Privacy and ET – provides a secure, trusted and productive technology environment and products.

- Marketing – responsible for driving demand for our products and services.

- Operations – responsible for the operational aspects of the business, including channel, sales and success teams.

- Product – responsible for ensuring the successful delivery of solutions, product development and management solutions.

- People – dedicated to fostering a thriving work environment, maintaining essential foundations to ensure our people and the business can operate smoothly and developing talent strategy.

- Corporate and Finance – responsible for overseeing financial operations, promoting the company to investors and ensuring compliance.

Qoria supports a hybrid working model that offers flexibility around when and where our employees work, in order to encourage employees to work in a way that helps them be productive and maintain a health balance. This means that employees work a combination of from our offices located in the map above and remotely.

Key staffing metrics

Measures	Unit	FY2023	FY2024	FY2025
% of our staff are based outside of Australia	%	66%	67%	72%
% of our leaders are held by individuals outside of Australia	%	60%	64%	69%
% of female Directors on the Board	%	17%	17%	17%
% of staff in full time employment	%	93%	89%	89%
% of staff <36 years of age	%	54%	53%	53%
% of staff 36-55 years of age	%	44%	44%	43%
% of staff 55+ years of age	%	2%	3%	3%

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Supply Chain

Qoria's procurement spend in FY25 was approximately AUD47m and the main categories included:

- Cloud infrastructure and data centre providers (Cloud services, hosting, and security services)

- Software development and third-party SaaS vendors (analytics, monitoring, authentication, third-party libraries)

- Hardware manufacturers and device OEMs for any devices Qoria integrates or distributes

- Professional services suppliers (consultants, legal, accounting, cyber security specialists, training providers, technology consultants and HR services)

- Sales, marketing and distribution partners and local resellers/implementers (international partners/agents)

- Office services and facilities (IT hardware, office supplies, professional services, commercial leases, office cleaning and maintenance, utilities)

- Other costs of raising capital and debt (bank and financial services fees)

- Travel and entertainment

- Regulatory and compliance fees (i.e. ASX, ASIC, share registry services)

- Employee benefits providers

Our direct suppliers are predominately based in the countries of our four main operating segments, namely: the US, UK, Australia and Europe. However, many of our suppliers are multinational companies that are likely to operate and source materials globally.

2. Modern Slavery Risks in our Operations and Supply Chain

Operations

Based on the workforce profile of the Group (largely knowledge based and non-manual roles), the lower inherent risks of modern slavery in the software sector, combined with our compliance with all applicable industrial relations laws and workplace policies, we are of the view that there is a low risk of modern slavery in our operations.

Of the countries in which we have offices, Sri Lanka is the only country deemed to have an increased prevalence of, and vulnerability to modern slavery according to the Global Slavery Index. On a scale of 0 to 100, with 100 being the highest vulnerability to modern slavery, Sri Lanka is rated as 56 and has above average vulnerability for the region.[1]

However, for the reasons described above in relation to our workforce profile and the workplace measures outlined in Part 3 of this statement, we are of the view that the risk of modern slavery in our engineering hub operations in Sri Lanka is low.

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[1] https://cdn.walkfree.org/content/uploads/2023/09/07191559/GSI_Snapshot_SriLanka_v5-1.pdf

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Supply Chain

There are inherent risks of modern slavery, including the worst forms of child labour, forced labour, debt bondage and human trafficking, in sectors with complex supply chains that rely on workforces with low barriers to entry, and in countries with a higher vulnerability to modern slavery due to weakened rule of law and worker protections.

In our procurement categories, there are increased risks of modern slavery in the supply chain of IT hardware, electronics, office furniture and consumables and corporate merchandise. There are also increased inherent risks of modern slavery in the operations and supply chains of outsourced call centres operating in higher risk jurisdictions and facilities management providers, particularly in office cleaning and maintenance services. As a result, we may be linked to modern slavery via the business practices and supply chains of our direct suppliers.

The use of temporary workers is also considered an area of increased risks of exploitation due to issues such as job insecurity and migrant workers paying recruitment fees leading to situations of debt bondage. However, the types of temporary workers we engage are not vulnerable to these types of risks given they typically perform office-based roles requiring skills, experience and qualifications.

Our partners or contractors may also use local temporary workers. The risks described above in relation to temporary workers may be amplified in countries with increased vulnerability to modern slavery.

3. Actions Taken to Assess and Address Modern Slavery Risks

The measures we have in place to ensure that our employees are engaged are designed to foster better staff retention. The effect of these measures also mitigates conditions that can lead to situations of worker exploitation akin to modern slavery. An overview of our measures are set out below:

Employee surveys

We regularly measure engagement through an annual employee survey, complemented by biannual pulse surveys. These surveys help us understand how our people are feeling, identify areas for improvement, and track progress over time. We partner with a specialist third-party provider to run these programs, allowing us to benchmark our results against industry peers and leading practices.

In 2025, we achieved our highest-ever engagement survey participation rate, with 90% of employees taking part. This strong response highlights the commitment of our people and the value they place on having their voices heard.

Employee compensation and share scheme

Qoria is committed to offering market-competitive compensation packages that include salary, benefits, and incentives. We leverage a specialist third-party platform, to ensure our compensation decisions are transparent, data-driven, and aligned with global market standards. Salaries are above the minimum wage and all of our employees receive a written contract.

We have a number of checks and balances in place to ensure compliance with minimum wage requirements in each jurisdiction:

- Our local HR, payroll or legal specialists (either internal or external consultants) ensure wage updates are tracked, audited and implemented promptly when laws change.

- Our HR and payroll teams have access to subscriptions for regulatory update services or tools to notify of changes to wage requirements (amongst other things).

- Our employees are provided with clear payslips for transparency of hourly rate and hours worked.

- We maintain a secure whistleblowing reporting channel where workers can report underpayments concerns safely.

Our Employee Share Scheme (ESS) is a cornerstone of Qoria's commitment to fostering ownership and long-term engagement. By offering shares to employees, we empower them to take an active role in the company's success and align their personal growth with the broader impact we aim to achieve as an organisation. Participation in the ESS program is close to 100% demonstrating a strong alignment between our employees' goals and Qoria's long-term vision.

Preliminary Due Diligence

In preparation for our inaugural report, we reviewed our procurement spend and main categories of spend to gain a better understanding of potential modern slavery risks in our procurement of goods and services. We identified that many of our key multinational suppliers in the technology sector were themselves reporting entities either in Australia, the UK or other jurisdictions. Their published statements shed light on the risks of modern slavery in their operations and supply chains, which in turn, informs our own supply chain risks.

Some of our smaller computing solutions suppliers are not reporting entities but they typically sourced hardware and materials from global manufacturers that meet the reporting thresholds and are required to publish conflict minerals reports and other disclosure reports.

The process of reviewing our procurement categories has provided us with insights on strategies for supplier engagement on the topic of modern slavery and the potential leverage we may have to drive these conversations with select suppliers moving forward.

Remediation

Qoria's Whistleblower Policy outlines our commitment to ethical conduct, transparency, and the protection of individuals who report misconduct. In line with global standards and regulatory requirements, we provide a secure online reporting channel, delivered through a third-party system, that enables employees to raise concerns anonymously and confidentially.

The policy is reviewed regularly to ensure it remains clear, robust and aligned with the needs of our global workforce.

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4. Assessing the effectiveness of our actions

During FY25, our focus was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. As we enter our second year of reporting, we have developed a set of goals as we work towards an uplift of our measures to mitigate modern slavery risks. We will track our progress against these goals and report on the outcome in our FY26 modern slavery statement.

1. **Supplier mapping & due diligence**

   ○ Create a prioritised supplier register based on inherent higher risk industries and spend thresholds.

   ○ Develop and implement a supplier due diligence questionnaire to assist in the modern slavery risk assessment of our priority suppliers.

   ○ Review the results of the due diligence and identify suppliers requiring further engagement based on modern slavery red flags identified via a questionnaire process.

2. **Procurement processes**

   ○ Incorporate and embed modern slavery due diligence into procurement practices.

   ○ Develop and publish a Supplier Code of Conduct.

3. **Training and awareness**

   ○ Develop and deliver bespoke training for procurement, legal, HR and country managers about modern slavery risks and red flags.

4. **Board oversight & governance**

   ○ Including progress updates on these goals periodically to improve board oversight of our activities and commitment to achieve year on year improvement.

5. Consultation and approval

Qoria consulted with its subsidiaries and controlled entities in the preparation of this statement. Qoria has a centralised finance function lead from the Perth head office, which has visibility over global procurement and a global HR / payroll function which has visibility over global people related matters. Both the centralised finance function, the global payroll and all local HR functions have been included in developing this statement.

This statement has been reviewed and approved by the Board of Qoria and signed by a member of the Board.

Tim Levy, Managing Director