



## Modern Slavery Statement for Financial Year FY23

### 1. ISELECT PTY LTD MODERN SLAVERY STATEMENT

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (the **Act**) by iSelect Pty Ltd (**iSelect**) in respect of iSelect and its wholly owned subsidiaries (**iSelect Group**) and relates to the Australian financial year 1 July 2022 to 30 June 2023. iSelect's corporate structure is detailed in Annexure A to this Statement. iSelect is the only reporting entity in the iSelect Group.

iSelect acknowledges that slavery can occur in many forms as detailed in the Act including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against the risks of any form of Modern Slavery taking place within the business or our supply chain.

### 2. ABOUT OUR BUSINESS

#### *Corporate Structure*

iSelect is one of Australia's leading destinations for comparison and purchasing across insurance, utilities and personal finance products. Our vision is to make Australians' lives easier by saving them save time, effort and money.

In December 2022, Innovation Holdings Australia Pty Ltd (**Innovation Holdings**) acquired the remaining shares in iSelect. Innovation Holdings previously owned approximately 26% of the shares in iSelect. At the same time, iSelect was delisted from the ASX and remains a private company.

Innovation Holdings is a subsidiary of a group of companies comprising Reef Holdings Limited, Theseus (Monaco) SARL and several associated entities (**IHA Group**). IHA Group owns Compare The Market Pty Ltd. A subsidiary of IHA Group, Auto & General, underwrites and distributes home, motor and travel insurance in Australia, primarily under the brand 'Budget Direct'.

As well as our flagship iSelect brand, the iSelect Group also owns energy comparison website Energy Watch. iSelect also partners with Fair Comparison, Lendi, Lifebroker, BizCover, Choosi and CIMET (in which iSelect hold a 49% ownership), to provide personal finance, home loans, life insurance and income protection, business insurance, pet insurance, internet and mobile phone plans respectively.

#### *Our operations*

iSelect is based in Melbourne, Australia. The iSelect Group employs approximately 270 staff, all of whom reside in Australia. The majority of our staff are currently engaged on a hybrid model, working 3 days per week in our office and otherwise work remotely. A number of our staff reside out of Victoria and work remotely full-time. Our employees are largely full-time workers (237 full time, 31 part time and 1 casual) and fulfil a broad spectrum of roles including finance, sales, commercial, marketing, executive, professional services, technology, clerical and HR. We have adopted policies that require our staff to be treated fairly and equally. Staff also have written employment agreements and some staff are covered by Awards.

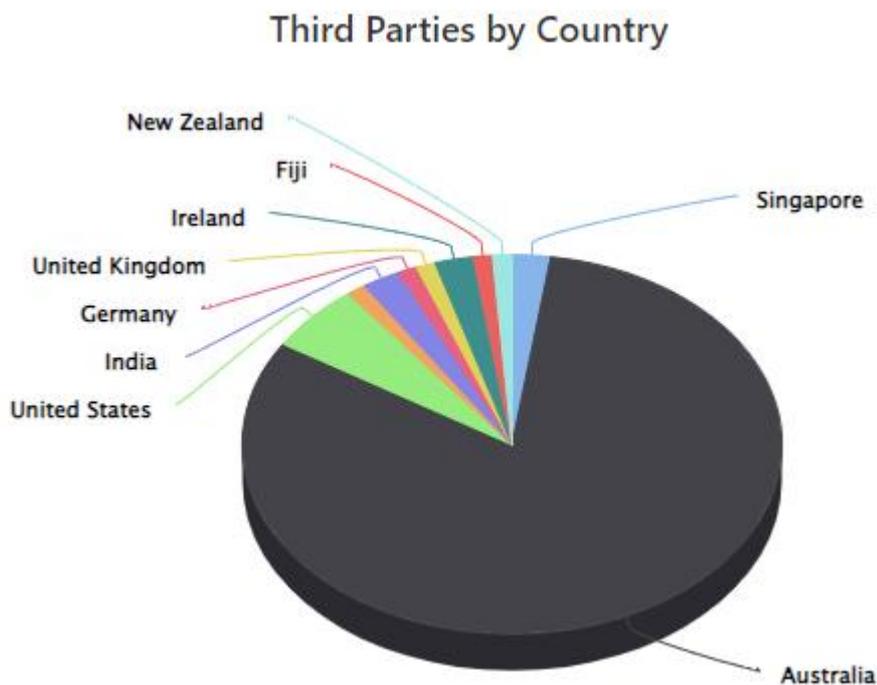
Recruitment agencies are engaged to assist with executive vacancies and specialist technical roles, however the bulk of iSelect's recruiting is managed internally.



### ***Our supply chain***

During the reporting year, we engaged approximately 260 suppliers, including products and services in categories such as technology, hardware, software, business and professional services, marketing, utilities, leasing premises and other corporate services. Our largest supplier spend was in the following sectors: marketing, IT hardware and technology, contracting/consulting services and occupancy costs. The iSelect Group engages contractors for compliance, IT support and technology development based in Fiji, India and Philippines. Many of iSelect's key suppliers, particularly overseas contractors, are part of stable long-term relationships.

In FY23, iSelect has implemented a mandatory modern slavery questionnaire for suppliers that is supported by the ethiXbase 360 Third-Party Risk Management Platform. This has provided us greater visibility and transparency over our supply chain and any Modern Slavery risks they may present. As an example, the below chart demonstrates the low-risk location of the majority of iSelect's suppliers.



### **3. RISK IDENTIFICATION**

At iSelect, we are committed to monitoring our Modern Slavery risk profile and having appropriate controls in place. We are continuing to develop risk management processes to monitor, evaluate and mitigate risks of Modern Slavery in our operations and supply chains.

The risks of Modern Slavery practices within our business were assessed on their potential to cause, contribute to or be directly linked to Modern Slavery through our operations and supply chains, as grounded in the human rights due diligence framework outlined in the United Nations Guiding Principles on Business and Human Rights.

#### ***Operations***

We do not consider that we have a significant risk of Modern Slavery in our operations. Our staff are all paid above minimum wage and are largely administrative. Our policies and procedures, and award



coverage for some staff, also provide protections from Modern Slavery. Our review of our Whistleblower reports has not identified any reports with red flags for Modern Slavery.

iSelect is a minority shareholder in CIMET and that business is also in our supply chain. CIMET has indicated that it is not aware of Modern Slavery in its operations or direct supply chains.

### ***Supply chains***

iSelect's risk management controls have not identified or provided any evidence or allegations of human trafficking/slavery activities against any of our suppliers. In addition, there have been no instances of Modern Slavery complaints received through our public Whistleblower process and procedure.

## **4. RISK MANAGEMENT AND DUE DILIGENCE**

### ***Policies***

We are committed to protecting the rights of our employees and continue to have the following policies in place to protect human rights:

- (a) iSelect Code of Conduct
- (b) Diversity and Inclusion Policy
- (c) Equal Employment Opportunity Policy
- (d) Whistleblower Policy

Our Whistleblower Policy is publicly available online. Employees, suppliers and members of the public may report incidents to iSelect's external independent whistleblower service, Your Call. Your Call is a company that accepts anonymous reports. A report may be made using Your Call's online form that can be accessed from their website.

### ***New strategies***

To manage the risks of Modern Slavery in our supply chain, iSelect has undertaken the following measures in the reporting year:

- Reviewed and updated its Modern Slavery Policy;
- Assessed key suppliers via a Modern Slavery questionnaire;
- Conducted an on-site Modern Slavery and human rights due diligence review over a number of days with a key overseas supplier based in Fiji;
- Embedded a Supplier Code of Conduct in our procurement processes to better manage the ongoing risk of Modern Slavery

We have determined that it's important to ensure our staff understand Modern Slavery risks in order to manage that risk. Accordingly, an annual enterprise-wide training program was implemented in FY21 to all existing employees. All new employees are required to complete a tailored induction program, which includes educating them on Modern Slavery. In FY23, our employees recorded a completion rate of 97% for our Modern Slavery online training module.



## 5. EFFECTIVENESS OF OUR ACTIONS

### *Corporate Governance*

All of the iSelect companies operate under a common set of policies and procedures. Responsibility for our Modern Slavery policy sits with the Board. Updates are provided quarterly to the LRC Governance Forum. Our Modern Slavery Officer is responsible for developing and implementing our anti-slavery program.

At iSelect we are committed to monitoring our Modern Slavery risk profile having appropriate controls in place. iSelect is continuing to develop risk management processes to monitor, evaluate and mitigate potential risks of where we could be exposed to Modern Slavery.

### *Future Program*

iSelect has a number of formal and informal feedback mechanisms across its operations and works hard to create a culture where employees can share their concerns. In FY24, the success of the Modern Slavery Policy within our business and supply chain will be assessed via the following measures:

- (a) ongoing training and capacity building of staff about modern slavery issues, measuring changes in awareness of risk, appropriate decision making and swift action as appropriate;
- (b) continuing to review our grievance procedures and whistle-blowing procedures for reports that potentially related to Modern Slavery; and
- (c) increasing the visibility, leverage and oversight of suppliers in relevant goods and services supply chains, including by way of comparing results of our online supply chain risk assessment questionnaire year-on-year.

iSelect recognises COVID-19 may have increased modern slavery risks in some of our operations and supply chains. Despite this, iSelect continued to engage with suppliers to mitigate the impact of COVID-19 and has implemented risk management processes to monitor, evaluate, assess and mitigate potential risks where we could be exposed to Modern Slavery.

## 6. CONSULTATION

Employees from multiple departments provided input in relation to this statement, including human resources, legal & compliance, finance and IT. The executives responsible for each of these departments have responsibility over all entities in the iSelect Group in relation to their relevant department. Accordingly, both iSelect Pty Ltd and all its controlled entities were consulted in relation to this Statement.

This statement was approved by the Board of iSelect Pty Ltd on 16 December 2023.

Signed:

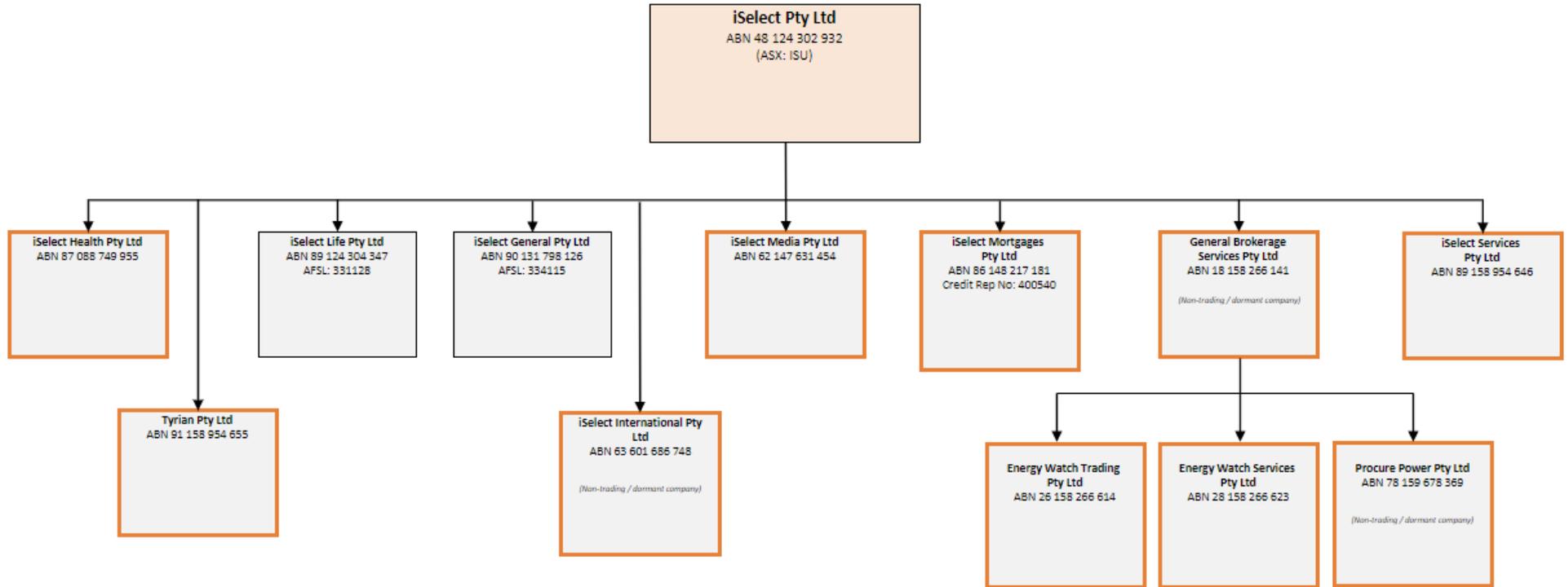
DocuSigned by:  
A handwritten signature in black ink that reads "Brodie Arnhold".

6555B966A0401Q3  
Name: Brodie Arnhold (Chairman)

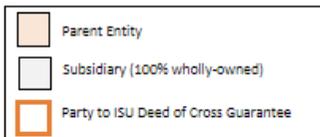
Date: 18 December 2023



ANNEXURE A



Legend:





## Annexure B

	<b>Mandatory criteria</b>	<b>Page number/s</b>
a)	Identify the reporting entity	<b>1</b>
b)	Describe the reporting entity's structure, operations and supply chains.	<b>1-2, Annexure A</b>
c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	<b>2-3</b>
d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	<b>3</b>
e)	Describe how the reporting entity assesses the effectiveness of these actions.	<b>4</b>
f)	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	<b>4</b>