

# Modern Slavery Statement FYE 2025

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## Identify the reporting entity

This Modern Slavery Statement is prepared by ORDE Financial Pty Ltd ABN 27 634 779 990 (**ORDE Financial**) in its own capacity and in its capacity as the trustee of ORDE Capital Management Limited ABN 13 636 165 378 (**ORDE, we or us**).

This statement relates to the reporting period Financial Year 2025 (1 July 2024 to 30 June 2025) in accordance with the requirements under the *Modern Slavery Act 2018 (Cth)* and has been approved by the Board of ORDE.

We are committed to upholding human rights and maintaining ethical business practices across all aspects of our operations and supply chain. We do not tolerate any form of modern slavery, including forced labour, human trafficking, or child exploitation. We actively assess and monitor our suppliers and partners to ensure compliance with the *Modern Slavery Act 2018 (Cth)*, and we aim to identify and mitigate the risk of modern slavery within our business operations and supply chain.

## Describe the reporting entity's structure, operations and supply chains.

### Business Structure

ORDE Financial Pty Ltd is the main operating entity within the ORDE Financial Group and conducts credit activities under Australian Credit Licence number 522079. Its responsible entity, ORDE Capital Management Limited, holds both an Australian Credit Licence (523150) and an Australian Financial Services Licence (523150), authorising it to operate Managed Investment Schemes for retail and wholesale investors. At the time of this statement, the scheme is not yet operational.

ORDE Financial's head and registered office is located at Level 15, 31 Queen Street, Melbourne VIC 3000. As at the date of this statement, the company employs 180 staff, the majority of whom are based in Victoria, and a smaller number located in other Australian states as well as offshore in India and the Philippines.

### Operations

ORDE Financial is a non-bank specialist lender that provides consumer finance solutions to a diverse range of borrowers. All lending is secured by registered first mortgages over real property in Australia. ORDE offers a suite of loan products including residential, commercial, self-managed super fund, and construction loans, designed to meet the needs of both individual and small to medium enterprise borrowers. ORDE Financial sources its funding from Australian and international financial institutions both privately and in the public capital markets and private investors to undertake its lending activity. Loan origination is conducted exclusively through a network of accredited mortgage brokers located throughout Australia.

The below graphic represents the geographical regions of our operations. For the context of modern slavery, this map, and the supply chain maps that follow, have been overlaid with the colour tier system of the [Trafficking in Persons Report](#).



**■ Tier 1**

Countries and regions whose governments, at the date of this assessment, fully meet the Trafficking Victims Protection Act's (TVPA) minimum standards.

**■ Tier 2**

Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, but are making significant efforts to meet those standards.

**■ Tier Special Case**

Due to civil conflict and humanitarian crises, gaining information is difficult and a tier has not been assigned.

**■ Uncategorised**

At the date of this assessment, insufficient information is available about these countries or regions and a tier has not been assigned.

**■ Tier 2 Watch List**

Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, and as the (increasing) number of victims is significant without proportional action, and/or no evidence of increased efforts to combat trafficking has been provided.

**■ Tier 3**

Countries and regions whose governments do not, at the date of this assessment, fully meet the minimum standards and are not yet making significant efforts to do so.

## Supply Chain

ORDE Financial's supply chain comprises 109 external service providers delivering a wide range of services critical to its operations. These include banking and financial services, professional services, IT infrastructure and software, risk and compliance platforms, insurance, property valuation, legal and settlement services, marketing and facilities management. The supplier base reflects a diverse mix of domestic and international partners, supporting ORDE's lending, governance, and operational functions across Australia and offshore.

The supply chain is primarily concentrated in Australia, with some suppliers operating or headquartered in jurisdictions such as the United States, India, and the Philippines. All suppliers are engaged under formal agreements or statements of work, with varying contract terms and renewal mechanisms.

This structure supports ORDE Financials' operational needs while requiring ongoing oversight to identify, assess, and mitigate modern slavery risks. The organisation maintains a register of service providers and conducts periodic reviews to ensure compliance with ethical sourcing standards and legislative obligations under the Modern Slavery Act.

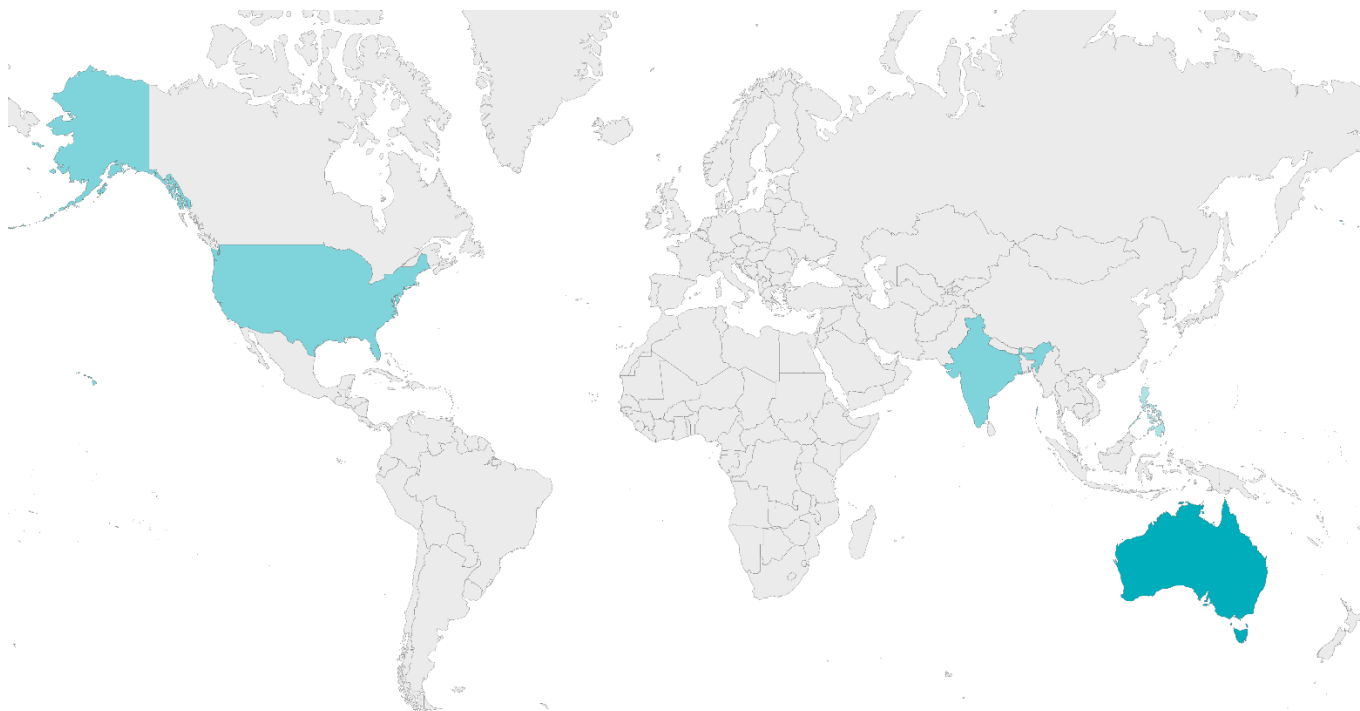
Our suppliers operate in the following sectors:

- Accommodation and Food Service Activities
- Administration and Support Services
- Agriculture, Forestry, and Fishing
- Arts, Entertainment and Recreation
- Building services contractor
- Cleaning
- Construction
- Domestic work
- Education
- Electricity, Gas, Steam and A/C supply
- Finance and Insurance
- Government administration, Defence and Social Security
- Health and Social Work
- Information and Communication
- International organisations, Diplomatic and Consular Services
- Labour hire
- Maintenance and Repair of motor vehicles
- Manufacturing
- Mining and Quarrying
- Personal services
- Professional and Scientific Services
- Real estate
- Retail
- Security services
- Transportation and Storage
- Water supply, Sewerage and Waste Management
- Wholesale

Our suppliers operate in many locations across the world, including:

- Australia
- Hong Kong
- India
- Philippines

- United States of America



**Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.**

Modern slavery refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.

The International Labour Organisation estimates that over 50 million people around the world are victims of modern slavery. In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent business practices that lead to modern slavery.

**Operations**
















ORDE Financial’s operations are primarily office-based and professional in nature, with most staff located in Victoria and a small number based in other Australian states and offshore in India and the Philippines. While the inherent risk of modern slavery within our direct operations is considered low due to the nature of our workforce and regulatory environment, we acknowledge that offshore arrangements – particularly in jurisdictions with weaker labour protections – may carry elevated risks. These include potential exposure to unfair labour practices, lack of transparency in subcontracting, and limited oversight of employment conditions. ORDE Financial remains committed to monitoring these arrangements and ensuring that all employment practices, whether domestic or offshore, align with our ethical standards and obligations under the *Modern Slavery Act 2018 (Cth)*.

## Supply Chain

Our suppliers operate, produce, and source across several/ different sectors. Some of these sectors can be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).

The below graphics show the high-risk sectors of operation, production, and sourcing for our suppliers. The numbers in the following graphics describe how many suppliers are in the corresponding sectors.

### Our Suppliers Operate in the following High-risk Sectors

	Accommodation and Food Service Activities <b>1</b>		Agriculture, Forestry, and Fishing <b>1</b>
	Building services contractor <b>1</b>		Cleaning <b>1</b>
	Construction <b>1</b>		Domestic work <b>1</b>
	Labour hire <b>1</b>		Maintenance and Repair of motor vehicles <b>1</b>
	Manufacturing <b>1</b>		Mining and Quarrying <b>1</b>
	Personal services <b>1</b>		Retail <b>1</b>
	Security services <b>1</b>		Transportation and Storage <b>1</b>
	Wholesale <b>1</b>		

*Our Suppliers Produce Goods and Provide Services in the following High-risk Sectors*



Construction

**1**



Labour hire

**1**



Personal services

**2**

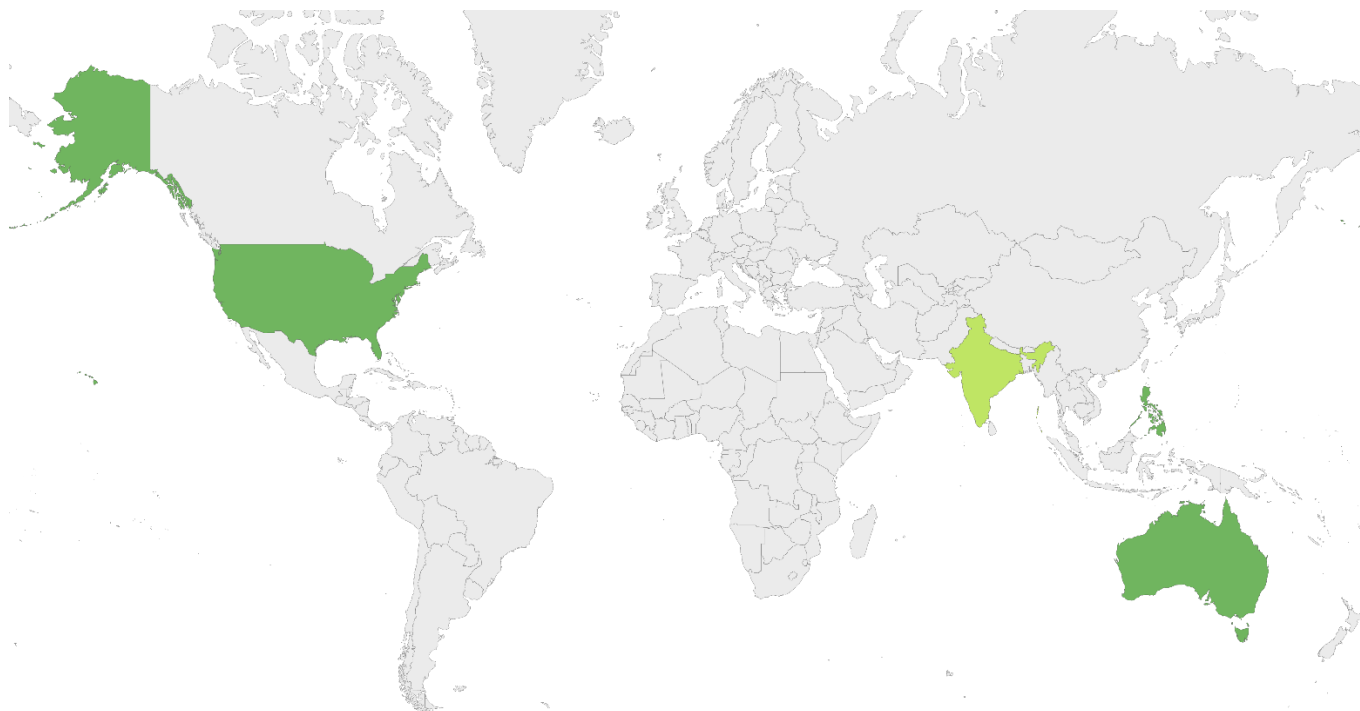


Retail

**1**

Some countries or regions where our suppliers operate can be described as high-risk due to the possibility of a link to human trafficking.

The geographical regions where our supply chain partners operate are shown in the map below. This map has been overlaid with the colour tier system of the [Trafficking in Persons Report](#).



**■ Tier 1**

Countries and regions whose governments, at the date of this assessment, fully meet the Trafficking Victims Protection Act's (TVPA) minimum standards.

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**■ Tier 2 Watch List**

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**■ Tier 3**

Countries and regions whose governments do not, at the date of this assessment, fully meet the minimum standards and are not yet making significant efforts to do so.

Some goods and services produced and sourced by our suppliers can be described as high-risk due to the possibility of a link to modern slavery practices such as forced labour and child labour.

The geographical regions where our supply chain partners produce and source goods and services that are considered high risk are shown in the maps below.

There is modern slavery risk associated with producing the following goods and services from the countries below:

- Australia
  - Labour hire



## 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.

### Assess

ORDE uses a third-party tool, the [iPRO Modern Slavery Assessment Tool](#) to assess modern slavery risks in our operations and supply chain. The risks identified in the previous section were all identified utilising this assessment tool. ORDE engaged iPro during the reporting period to conduct the assessments on our operations, and a bulk assessment of our top 10 spend digital service providers to prioritise risk evaluation where our operational reliance and financial exposure are most significant. These suppliers deliver critical technology infrastructure, software platforms, and managed services that underpin our lending and compliance operations. The assessment also considered our offshore workforce, which includes developers and testers based in India and the Philippines—jurisdictions that may carry elevated modern slavery risks due to differing labour protections and oversight standards. By focusing on these key digital relationships, ORDE aimed to establish a meaningful baseline of risk, strengthen supplier accountability, and ensure ethical practices across high-impact areas of our supply chain.

Participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned one of the following risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

ORDE also completed a self-assessment using the same process to determine a risk category for our operations:

## Modern Slavery Assessment

### Summary

Your current risk category <sup>①</sup>



#### Low-Risk (No inherent risk)

While inherent risk is low there is still an opportunity to achieve best practice by reducing unmitigated risk.

Inherent risk <sup>①</sup>

**20.00** / 100

= Low

Unmitigated risk <sup>①</sup>

**81.27** / 100

= Inadequate risk control

### Address

Suppliers that completed the self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment.

Action items were also aggregated, giving ORDE Financial a focused view of the most impactful actions that could be taken by suppliers across the supply chain.

We will commence rolling out a supplier follow-up initiative to further discuss the action items and address the risks identified through the assessment. Primarily this involves ensuring that suppliers have the right policies and procedures in place to mitigate inherent risks in their business.

Other ways we are addressing modern slavery risks include the integration of modern slavery as a standing agenda item at ORDE Financial's Audit and Risk Committee, which meets quarterly to oversee risk management and compliance matters. In addition, our commitment is supported by the following internal policies and frameworks:

- Whistleblower Policy
- ESG Statement
- People & Culture Policies (including but not limited to employee code of conduct, remuneration, work-place health and safety)
- Anti-Money Laundering & Counter Terrorism Finance Program

### **Describe how the reporting entity assesses the effectiveness of the actions being taken to assess and address the risks of modern slavery practices in its operations and supply chains.**

We utilise the benchmarking and KPI's in the iPRO Modern Slavery Assessment Tool to assess the effectiveness of our actions.

As this is the first year ORDE Financial has used the iPRO platform to conduct structured assessments and due diligence across our supply chain, we are establishing a baseline of risk insights and supplier engagement. This will enable us to objectively measure the effectiveness of our actions and improvements when assessments are repeated in the next reporting period. We expect future cycles to provide clearer visibility into risk trends, supplier responsiveness, and the impact of our mitigation strategies over time.

The main KPI's we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process.

Each organisation who completed the assessment questionnaire was assessed and given 2 risk scores.

- Inherent Risk Score
- Unmitigated Risk Score

The Inherent Risk Score measures modern slavery risks that are intrinsic/built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The Unmitigated Risk Score measures the organisations risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.

ORDE is provided an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level.

We aim to continuously improve on these KPI's.

As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score by introducing relevant policies and procedures.

We also measure the effectiveness of our engagement with suppliers and will continue to encourage participation in our assessment programme to better identify and mitigate modern slavery risks in our supply chain.

### Reporting Period Year KPI's

This is the score for ORDE Financial.

Our Operations Risk Scores	
Inherent Risk Score	20.00 / 100
Unmitigated Risk Score	81.27 / 100

Aggregated Supply Chain Risk Scores	
Inherent Risk Score	29.44 / 100
Unmitigated Risk Score	28.96 / 100
Currently, our suppliers are evenly distributed between the risk categories of Low-Risk (No inherent risk) and Medium-Risk (Partial risk control).	

Supplier Assessment Completions	
Completions	9 / 10
Completion Rate	90%

**Describe the process of consultation with any entities that the reporting entity owns or controls**

All entities within the ORDE Group have been consulted and are covered by this Statement.

**Provide any other relevant information**

This will be considered over the course of the next reporting period once we gain maturity of process and expand our review of further suppliers currently engaged or to be engaged.


**Approval and Sign Off**

Signed for and on behalf of ORDE Holdings Pty Ltd and associated entities.

**Paul Wells**

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Director name



Director signature

**Ryan Harkness**

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Director Name



Director signature