



This Modern Slavery and Human Trafficking Statement (**Statement**) is made by Lendi Group Pty Ltd (ACN 648 681 654) and its controlled entities listed in Appendix A (collectively, '**Lendi Group**', '**us**', '**we**', and '**our**'). This Statement outlines Lendi Group's approach to assessing and identifying risks of modern slavery and human trafficking in our operations and supply chains, and the controls and processes that are in place to ensure our business continues to be conducted in a manner which minimises modern slavery risks.

Objective and Scope

This Statement outlines the actions taken by us to identify and prevent modern slavery and human trafficking across our business and supply chains during the year ended 30 June 2024 (**Reporting Period**). The Statement is made by Lendi Group pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**).

In this Statement, we refer to Modern Slavery as defined in the Act and understand this may occur in many forms including human trafficking, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.

Our Business

Lendi Group incorporates the Australian-based businesses and brands of both Lendi and Aussie, each founded as market disruptors with a common purpose of helping Australians get access to better home loan deals, rates, and information. Lendi commenced operations in 2013 to empower borrowers with more transparency and choice while Aussie was founded in 1992 to bring competition to the Australian home lending industry. In 2021, Lendi and Aussie merged to create Lendi Group and to usher in a new era of seamless connection between customers, lenders, brokers and data.

Driven by its mission to "*Change the way Australians experience property lending, for good*", Lendi Group is home to Australia's number one home loan platform, a network of over 1,300 brokers, 800 team members, a loan book of over \$100 billion and a retail footprint of more than 216 stores across Australia. While Lendi Group only offers services to customers in Australia, we employ team members throughout Australia and in the Philippines and we procure services from a range of suppliers in Australia and abroad.

Our Governance Structures

Our directors and executives are responsible for creating and promoting an environment in which compliance and ethical business practices are expected, including conducting our business in a way that mitigates the risks of Modern Slavery and promote human rights. This is reflected in our 'compliance by design' approach which establishes in-built guardrails that support and promote compliance in day-to-day operations.

Lendi Group's senior leadership team are responsible for the wellbeing of all team members and for the Group's regulatory and legal compliance. Our Senior Leaders report to the Chief Executive Officer who, in turn, reports to Lendi Group Board and Board, Audit and Risk Committee. This reporting includes regular updates on various areas of compliance and regulatory matters, including Modern Slavery.



Our approach to Modern Slavery

Lendi Group recognises the importance of respecting human rights, which we see as integral to us making a meaningful contribution to the communities in which we operate and to the supply chains that we utilise. We take the risk of Modern Slavery very seriously and consider it fundamental that we conduct our business in a responsible manner. This is embodied in the Group's value of "**keeping home loans human**" which emphasises the importance of people in our operations and within the community in which we operate.

We expect a high standard of human rights performance from everyone involved in our business. This is a key consideration in everything we do: throughout our team, our operations and our supply chain, including as an employer and as a provider and user of services. All Lendi Group directors, employees and contractors are expected to comply with relevant policies and act in an ethical, responsible and lawful manner. This responsibility includes the reporting of any breaches of law or policy or instances where it is believed actions would not meet the expectation of regulators, team members, the community and, importantly, our customers. We empower our people to speak up when they see things that aren't right.

Our Modern Slavery Risks

We continue to analyse and assess our supply chains and operations to identify Modern Slavery and human trafficking related risks. Based on our Modern Slavery risk assessment, we consider the risk of causing, contributing to, or being linked to instances of Modern Slavery to be low for Lendi Group. This is due to the nature and geographic locations of our people, operations and supply chains. Our risk assessment has identified the following as the most high-risk areas for our business:

1. Supply Chains

Our supply chains consist of a range of suppliers for goods and services. Key categories of goods and services include:

- Advertising and media
- IT hardware and communications
- Cloud and software services
- Insurance
- Professional services – legal, audit and recruitment
- Building services and office equipment
- Catering and hospitality
- Travel
- Mail and logistics

We procure a range of goods and services from a diverse supply chain. Our supplier arrangements range from one-off purchases with non-contracted suppliers through to multi-year, larger value strategic partnerships. We work mainly with suppliers based in Australia; however, some suppliers are based overseas.



2. Our Employees and Contractors

The majority of our employees and contractors are skilled individuals based in Australia. They do not hold roles that are high risk or vulnerable to slavery or human trafficking. We also have employees in the Philippines. We have policies and processes in place to ensure that our employees in the Philippines are provided with a fair and equitable working environment in accordance with Filipino employment obligations. Our employees in the Philippines are all on permanent employee contracts and receive remuneration in excess of the local minimum wages. Lendi Group's Flex First approach which includes both location and time flex elements, is applied to all employees regardless of location, including throughout Australia and the Philippines.

3. Procurement of Branded Promotional Material

While our overall assessment of the procurement of goods results in a low Modern Slavery risk, we recognise that some goods and services carry a higher Modern Slavery and human trafficking risk. Of the goods and services that Lendi Group procures from third parties, we recognise that the purchase of branded promotional material, including clothing and goods falls within an area that carries a higher risk of Modern Slavery. The steps taken in relation to this are addressed in this Statement.

Actions Taken and Resources to Address Modern Slavery Risks

We expect everyone at Lendi Group to conduct themselves in line with our strong values that promote doing the right thing. To achieve this, we have taken the following actions in the Reporting Period:

Employee training:

Prior to the Reporting Period, Lendi Group implemented a compulsory training program for all employees and contractors. The purpose of the training was to raise awareness about Modern Slavery, provide education on potential risk areas, and outline Lendi Group's efforts to mitigate these risks within our operations and supply chains. Modern Slavery has continued to be part of the mandatory training schedule, serving both as a periodic update and an introduction for new team members. It emphasizes the critical role each team member plays in the prevention of Modern Slavery, reinforcing our "**Act like you own it**" Group principles. All team members are encouraged to be vigilant and report any suspicions or warning signs to ensure swift investigation and action.

Policies:

Our commitment to human rights is supported by our policies. Existing policies are routinely reviewed and updated and we also continue to implement additional policies to address any areas where we see benefit in setting out guidelines or procedures for how teams manage and address specific business risks or areas. At the end of the Reporting Period, there were a number of Lendi Group policies in place which support the Group's commitment to human rights and addressing Modern Slavery risk. These policies include:

- **Broker Governance Policy** – this policy requires that all brokers act in accordance with the highest standards of ethical behaviour at all times



- **Supplier Governance Framework** – this policy outlines the triggers for initiating supplier due diligence, supplier risk classification and the onboarding and ongoing minimum risk management obligations associated with these suppliers
- **Conflict Management Policy** – this policy provides guidance on identifying and managing conflicts and includes a specific section on how to identify and avoid any forms of Bribery and Corruption and any forms of Modern Slavery
- **Employee Code of Conduct** – the code further embeds our values into how employees behave and what they can expect when working at Lendi Group. It includes an obligation for all Lendi Group team members to behave in a professional and respectful manner. This includes the importance of the Group's principle to be "**Radically Transparent**"
- **Whistleblower Policy** – our Whistleblower Policy supports the Group's expectation that team members, suppliers and other associates of the Group be open and speak up and report any concerns or matters of conduct which they reasonably suspect to be unethical or corrupt. The Policy provides mechanisms for such reports and confirms that whistleblowers will receive all protections provided at law. This policy is cited in our Modern Slavery training module as a way in which suspicious conduct could be reported.

Suppliers:

Lendi Group has a dedicated procurement function that works closely with our risk, compliance and legal teams to implement and maintain a supplier governance framework. This framework includes the onboarding and contract renewal processes and procedures for all new and existing suppliers.

Review and refinement of our supplier onboarding processes is a perpetual process aimed at ensuring we continue to identify and minimise any risks that may be present in our supply chain.

Our current supplier engagement process includes:

- Where practicable, utilising Lendi Group's template supplier contract which incorporates robust Modern Slavery provisions requiring suppliers:
 - ensure that all services will be conducted in compliance with Modern Slavery laws;
 - use best endeavours to monitor, identify and minimise any risks of Modern Slavery or human trafficking that may be present in their operations and supply chains;
- Conducting high-level checks for published modern slavery contraventions, with any identified concerns, reports or flags included in the overall risk assessment and mitigation process.

For any suppliers that are identified as high risk, we undertake heightened due diligence which includes conducting further investigation and analysis of:

- any known unethical practices identified during the supplier selection and engagement process;
- existence of media articles that may indicate unethical supplier practices; and
- the supplier's reputation in the community.

We believe that focussing on the highest risk areas allows us to best utilise our resources to combat the risks of Modern Slavery and human trafficking. This is an example of the Group's philosophy that we should "**focus on the right things through disciplined prioritisation**".



Effectiveness of actions

At Lendi Group we understand that combatting the risks of Modern Slavery is best achieved by utilising a range of approaches and input from across all areas and stakeholders. We also acknowledge that this is not a set-and-forget matter, it is an ongoing process that requires regular monitoring, review and updates. It is a true reflection of the Group's principle that **"we always create, celebrate, iterate"**.

As we continue to embed and mature our processes and controls to detect and address Modern Slavery risks in our operations and supply chains, during this Reporting Period our focus was on developing targeted process uplift to identify higher risk spend areas within our supply chain and provide effective resources to support our suppliers and risk teams in assessing potential Modern Slavery Risks at the onboarding stage. We are committed to ongoing monitoring of the outcomes of the changes that we have made so that we can continue to adapt and strengthen our actions to achieve ongoing improvement in our response to Modern Slavery.

Consultation Process

Lendi Group operates as an integrated group of companies with policies, systems and approaches that apply broadly across the Group. To prepare this statement, Lendi Group Pty Ltd engaged and consulted with each of the controlled entities covered by this statement, as listed in Appendix A.

Key achievements during the Reporting Period

Lendi Group is committed to the highest ethical standards and continues to review the effectiveness of our approach to improve our ability to detect, mitigate and reduce the risk of Modern Slavery within our business. In our last Modern Slavery Statement we noted certain key actions to achieve during the Reporting Period. We are pleased to confirm that we achieved each of the key actions that we set out to achieve. The key achievements and actions undertaken during the Reporting Period were:

1. Uplift and enhancement of our supplier onboarding processes through development & implementation of a Modern Slavery Self-Assessment questionnaire issued to those new suppliers who were identified as operating in high risk spend areas e.g. Branded goods & merchandise;
2. Development and publication of the Group's first Supplier Code of Conduct to promote and underline our overarching value system and commitment to ethical business engagements including our position on Modern Slavery;
3. Completion of a targeted review of the local services supporting our operations in the Philippines to identify and implement any additional checks and controls that might be prudent to address any Modern Slavery risks; and
4. Published our FY23 Modern Slavery Statement on the Lendi Group website and, where required, made the Statement available to other parties.



Next Steps

In the forthcoming reporting period to 30 June 2025, we have identified the following as our key actions:

1. Assess our existing supplier pool to identify any legacy engagements that do not contain our specific Modern Slavery related provisions, and circulate our Supplier Code of Conduct for their specific awareness; and
2. Expand our sourcing toolkits to include a 'comparison of bid' checklist specifically geared to support team members in incorporating modern slavery risk as part of their supplier evaluation criteria within spend groups associated with a higher modern slavery risk e.g. promotional goods/merchandising.

This statement was approved by the board of Lendi Group Pty Ltd, in their capacity as principal governing body of Lendi Group on 17 October 2024. It is signed by David Hyman in his role as Chief Executive Officer.

David Hyman

Chief Executive Officer

17 October 2024



Appendix A

Reporting Entities for the Group

- Lendi Group Services Pty Ltd
- Lendi Group Finance Pty Ltd
- AHL Holdings Pty Ltd
- Lendi Group Distribution Pty Ltd
- Lendi Pty Ltd
- Digital Home Loans Pty Ltd
- Lendi Group Broking Pty Ltd
- Click Loans Pty Ltd
- Lendi Services Inc.
- Aussie Home Loans Pty Ltd
- Aussiehomeloans.com.au Pty Ltd
- Aussie Homes Platform Pty Ltd