



# 2023 MODERN SLAVERY STATEMENT

## INTRODUCTION & REPORTING ENTITY

**This Modern Slavery Statement (the Statement) is made pursuant to the Australian Commonwealth's Modern Slavery Act 2018 (Australian Act) and the United Kingdom's Modern Slavery Act 2015 (UK Act) by ColCap Financial Limited (ACN 650 487 353) (ColCap) and its related bodies corporate (the Group). This is ColCap's fourth Statement under the Australian Modern Slavery Act and our second under the UK Modern Slavery Act. It covers the period 1 January 2023 to 31 December 2023 (2023).**

In this Statement use of the words "the Group", "ColCap Group", "we", "us" or "our" refers to ColCap and its subsidiaries, including any entities that the reporting entity controls and entities in which the reporting entity has an ownership interest exceeding 50%, unless otherwise stated. The risks and actions described in this Statement are those which relate to the business of the Group.

Unless otherwise indicated, monetary amounts in this Statement are reported in Australian dollars and the data and information provided is as of 31 December 2023.

This Statement outlines the actions taken by the Group to identify, assess and mitigate modern slavery and human trafficking risks in our operations and supply chains during 2023. In preparing this Statement, all the Group's entities were engaged and consulted.

ColCap's success is measured not only by commercial outcomes but by our overall contribution to the communities in which we do business. We believe that we must make a genuine positive difference in that context.

ColCap achieves this through the choices that we make about the products we provide, how we run our business, who we choose to engage with, and through the commitments we make to our customers and communities over the long term.

Our mission is to bring innovative solutions to our community. At the heart of this mission is our focus on acting with integrity and respect as we strive to deliver value by daring to challenge. In accordance with our mission, ColCap is committed to protecting and advancing human rights within the jurisdictions that we conducted business or had a physical presence in 2023, namely Australia, the United Kingdom, and the Philippines.

Modern slavery is a serious and multi-dimensional issue requiring ongoing and coordinated action. The role we play in combatting modern slavery is a responsibility we take very seriously. We aim to leverage a long-term and sustainable approach that uses commercial responses to societal challenges, while ensuring that we engage in ethical business practices.

This Statement covers the products, operations, and supply chain of the Group. It also provides insight into the modern slavery risks that we identified in our products, operations, and supply chain across 2023 along with the actions that we took to address these risks as an employer, lender, service provider, acquirer of goods and services, and donor to charitable organisations.

Page 12 outlines the reporting criteria that this statement adheres to under the Australian and UK Acts respectively and identifies where each criteria is addressed.

**ColCap Financial Limited  
(ACN 650 487 353)  
is the Group's sole Reporting Entity  
pursuant to section 14 of the Australian Act  
and section 54 of the UK Act.**

### In 2023 the ColCap Group comprised:

ColCap Financial Limited  
Consortia Group Holdings Pty Limited  
Austrata Finance Pty Ltd  
AVA U2 Pty Ltd  
ColCap Financial Overseas Holdings Limited\*  
ColCap Financial UK Limited\*  
ColCap Investments Pty Ltd  
ColCap Pty Limited  
ColCap Servicing Pty Ltd  
Columbus Capital Financial Pty Limited  
Columbus Capital Funds Management Pty Limited  
Columbus Capital Pty Limited  
Elizabeth RR No.1 Limited\*  
Elizabeth RR No.2 Limited\*  
Granite Home Loans Pty Ltd  
Homestar Finance Pty Ltd  
Molo Tech Limited\*  
Molo Holdings No.1 Limited\*  
Molo Holdings No.2 Limited\*  
Molo Holdings No.3 Limited\*  
Origin Mortgage Management Services Pty Ltd  
Pharos AQ 2020 Pty Ltd  
Pharos AQ-L 2021 Pty Ltd  
Pharos AQ 2021 Pty Ltd  
Pharos AQ 2021V Pty Ltd  
Pharos AQ 2022 Pty Ltd  
Pharos AQ 2023 Pty Ltd  
Pharos AQ NTX Pty Ltd  
Pharos AQ Pty Ltd  
Pharos CB 2020 Pty Ltd  
Pharos IAC 2017-2 Pty Ltd  
Pharos IAC 2018-1 Pty Ltd  
Pharos IAC 2019-3 Pty Ltd  
Pharos IAC 2020 Pty Ltd  
Pharos IAC 2023V Pty Ltd  
Pharos IAC Pty Ltd  
Pharos IAC-H 2021 Pty Ltd  
Pharos IAC-L 2021 Pty Ltd  
Pharos NB 2021 Pty Ltd  
Pharos NB 2022 Pty Ltd  
Pharos NB Pty Ltd  
Pharos RV Pty Ltd  
Pharos WBC 2023 Pty Ltd  
Xpress Loans Direct Pty Ltd  
Xpress Loans Pty Ltd

\* Company Registered In The United Kingdom

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## ABOUT COLCAP | STRUCTURE & OPERATIONS

**ColCap is a leading non-bank financial institution specialising in prime residential mortgage lending, in Australia and the United Kingdom.**

Entities within the Group also provide products, services, and infrastructure to facilitate the provision of mortgage loan products to borrowers. Group entities also undertake third party loan servicing and trust management activities. The ColCap Group's business is funded through a combination of bank balance sheet warehouses and wholesale term capital market transactions (securitisation transactions) as well as fees it receives in its various products and services.

### Our Values

Our core values are the guideposts that help to ensure our decisions and behaviors are the right ones, as seen over the long term. They explain who we are and what we stand for, and they provide a roadmap for continued success.

Every day we seek to ensure that these core values demonstrate themselves in our products, our working relationships, our interactions with customers and our business operations.

### Core Businesses

We serve our customers through four businesses: Origin Mortgage Management Services, Homestar Finance, Granite Home Loans, and Molo. These businesses serve around 115,000 customers in Australia and the United Kingdom. Our customers range from individual borrowers purchasing their first home to investors seeking specialist mortgages. 96% of ColCap's loan portfolio is originated through our Australian businesses.



**Care for our people**



**Own what we do**



**Lead by example**



**Curious and innovative**



**Act with integrity and respect**



**Put the customer first**

**ORIGIN**

Origin is an Australian wholesale distribution business that primarily provides white label residential mortgage loans originated by Mortgage Managers under their brands.

**homestar**  
finance

Homestar is an Australian retail mortgage management businesses that provide loans directly to retail consumers which includes loan products for owner occupied and investment purposes as well as SMSF and construction loans.

**GRANITE**

Granite is an Australian funder of residential mortgage loans originated primarily through mortgage aggregators and mortgage broking groups.

**molo**

Molo is a United Kingdom based digital mortgage lender offering Molo-branded loans direct to borrowers and through intermediaries. The business is initially targeting Buy-to-Let mortgages and in time will provide regulated mortgages.

ColCap's lending businesses are funded through a combination of bank balance sheet warehouses and wholesale term capital market transactions (securitisation transactions).

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## ABOUT COLCAP | STRUCTURE & OPERATIONS

### People

The Group employs a professional, adult, workforce where the risk of modern slavery is generally expected to be low. All employees and contractors are employed / engaged in compliance with local laws, including meeting any requirements in relation to child labour. Some of the Group's employees in Australia and the United Kingdom are immigrants or skilled workers holding work visas, and similarly are employed in compliance with local laws and in accordance with the relevant jurisdiction's immigration criteria.

As of 31 December 2023, ColCap had 321 full-time equivalent permanent employees and contractors, 94 of which were employed in Australia, 180 in the Philippines, and 47 in the United Kingdom.

### Locations

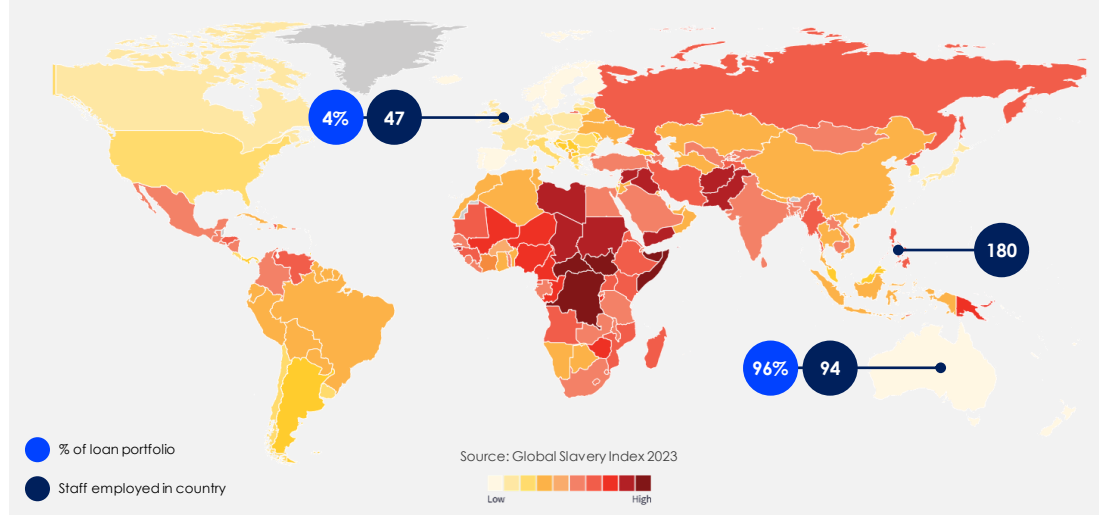
The group operates across three main jurisdictions; Australia, the United Kingdom, and the Philippines. Most of our people who are employed / engaged in Australia are based at the Group's corporate head office in Sydney. Our business in the United Kingdom is headquartered in London and a number of our people work remotely across the country.

Those staff and contractors who are located in the Philippines are based in Manila. Our operations in Manila are focused on providing services to our businesses in Australia and the United Kingdom through the wholly owned ColCap Servicing Pty Ltd – Philippine Branch Office. We do not engage in the provision of financial services in the Philippines.

### Governance

ColCap's Board retains oversight of Modern Slavery risk. Modern Slavery considerations are integrated into business strategy, operations and risk management where relevant. The Board annually approves the Group's Modern Slavery

Locations where ColCap operates and employs staff overlaid on estimated country vulnerability to modern slavery.



Statement. The Board is supported in its role by the Board Risk Committee (BRC) which has accountability for oversight of the Group's risk profile and risk management. This includes Modern Slavery risk, within the context of Board determined risk appetite. Ultimate responsibility for risk oversight, risk appetite and risk management rests with the Board.

The BRC refers material matters to the Board in accordance with its charter, making recommendations to the Board concerning the Group's current and future risk appetite, risk management strategy and particular risks or risk management practices, including those related to human rights.

The Group's Chief Executive Officer and its Chief Operations Officer oversee enterprise-wide risk management through the Executive Committee and its supporting sub-committees. The Group's

Chief Legal Risk and Governance Officer is accountable for the management of modern slavery risk as informed by the Group's Risk Management Practices.

### Managing ESG Risk

We take a risk-based approach to managing ESG issues, including human rights-related issues like modern slavery and human trafficking. ColCap regularly looks for opportunities to enhance its ESG risk management processes, which includes how it identifies, assesses, mitigates and monitors potential risk areas where the Group could be exposed to human rights concerns, including modern slavery and human trafficking

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## ABOUT COLCAP | SUPPLY CHAIN

### Supply Chain

We seek to do business with suppliers and other third parties that have similar values, ethics and sustainable business practices, including those related to modern slavery.

The Group procures a range of goods and services from a diverse supply chain. Our supplier arrangements range from one-off purchases with noncontracted suppliers through to multi-year, large value strategic partnerships governed by master agreements. We recognise that our suppliers play an important role in helping us to positively contribute to the social, economic, and environmental wellbeing of the communities that we are part of. Therefore, a modern slavery assessment forms part of our review of all potential and ongoing engagements with Material suppliers.

Material suppliers are deemed to be those with whom we have an on-going contract for services with a value of over \$50,000, including our funding partners. Suppliers that were used only once during the year (and will not be used again) are also not considered to be 'material'. *The majority of our direct material suppliers are based in Australia, the United Kingdom, and the USA.*

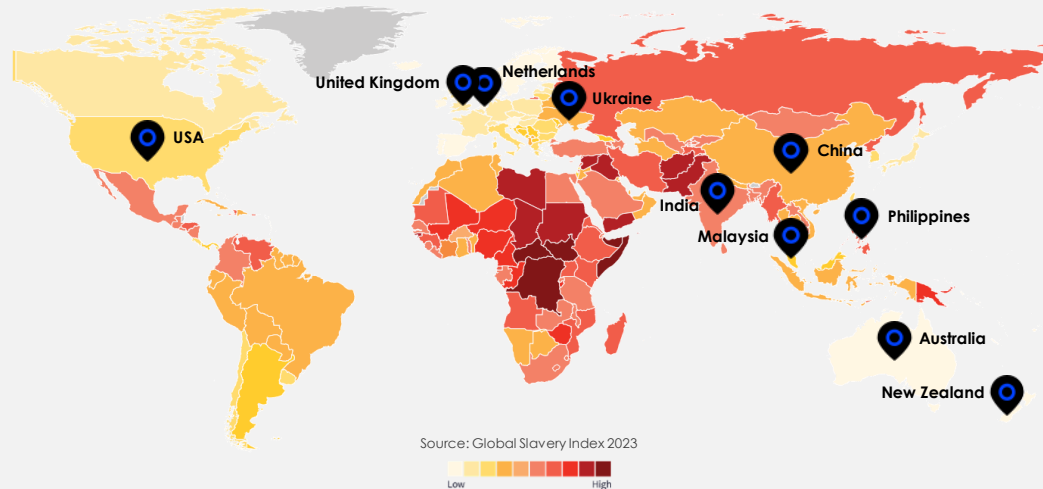
Our assessment of suppliers has been developed to consider the likelihood of modern slavery risk within our supply chain and to assist us in determining whether a supplier is high risk. A supplier could be considered high risk due to several factors, including criticality of services, impacts on customers, exposure to financial crime, ability to meet regulatory / legal requirements and/or operating in or providing goods or services from higher risk countries or from industries considered to be at high risk of modern slavery.

There have been no substantive changes to our supply chain from the prior reporting period that have been identified as negatively impacting the Group's exposure to modern slavery risk.

#### Supply chain types that ColCap is exposed to.



#### Locations (by Country) of material suppliers overlaid on estimated country vulnerability to modern slavery.



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## RISK OF EXPOSURE

**ColCap is committed to operating in a manner consistent with the United Nations Guiding Principles on Business and Human Rights (UNGPs). We are continuing to work on integrating the UNGPs internally. ColCap takes a Group-wide approach to managing modern slavery risks in its operations and supply chain. In this Statement, unless stated otherwise, we describe our modern slavery risks based on the inherent factors that ColCap is exposed to (see illustration below).**

We recognise that there are potentially multiple areas of modern slavery risk across our operations and supply chain given their global nature. We have assessed our modern slavery risk against the financial services we provide, the scope and scale of our supply chain, and with consideration to the UNGPs.

### Defining Modern Slavery Risk<sup>1</sup>

Modern slavery is the serious exploitation of a person that undermines their freedom. When modern slavery occurs, a person cannot refuse or leave their work due to threats, violence, coercion, abuse of power or deception<sup>2</sup>.

Modern slavery occurs in a variety of forms including: human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. Our definition of modern slavery risk includes explicit links between modern slavery and labour rights violations that are significant and systemic.

*Modern slavery risk is the potential for ColCap to cause, contribute to, or be directly linked to one or more types of modern slavery through our products, operations, and / or supply chains.*

1. We use the Australian modern slavery legislation and reputable research to guide our approach to defining modern slavery.  
2. As defined in the Australian Modern Slavery Act 2018 (Cth).

### Identifying Modern Slavery Risk

We seek to identify our salient modern slavery risk exposures according to where we could potentially cause or contribute to significant negative human rights impacts based on the exposure types outlined below.

Our identification of modern slavery risk exposures incorporated the Global Slavery Index report (GSI report). The GSI report highlights a series of compounding crises over the last five years that

have increased the prevalence of modern slavery. Factors that have contributed to the rise in modern slavery include increasing and more complex armed conflicts, widespread environmental degradation, assaults on democracy in many countries, a global rollback of women's rights, and the lingering economic and social impact of the COVID-19 pandemic. We also recognise that these factors have impacted employment and education, which has increased poverty and unsafe migration that together have raised the level of modern slavery risk generally.

#### Inherent modern slavery risk factors that ColCap is exposed to.



##### Geographic

Location-specific exposure to modern slavery, based on societal vulnerabilities, including basic labour rights and working conditions, inequality, political stability, corruption, safeguarding of civil and political rights, discrimination, and gender equality.



##### Sector

Industry-specific exposure to modern slavery, based on competitive, market, and other forces that leave certain product and / or service types vulnerable to labour exploitation and other forms of modern slavery.



##### Business Model

Business-specific exposure to modern slavery, based on internal decisions about geographic distribution of supply chains, the degree of outsourcing, dependence on high-risk inputs, and sourcing of products with established links to forced labour.



##### Vulnerable People

Exposure to modern slavery because of interactions with individuals or groups of people who are or could be more readily exposed, or susceptible to harm (in a human rights context), or unable to advocate for themselves in exploitative or detrimental employment situations.



##### Situations

Situation-specific exposure to modern slavery controversies, based on alleged or verified failures to respect international norms on modern slavery by government, industry, individuals, religious institutions, and charities.

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## RISK OF EXPOSURE

### Assessing Modern Slavery Risk

Our annual risk assessment process considers the inherent modern slavery risk exposure factors in our products, operations, and supply chain. Inherent exposures are those which exist because of the nature and / or scope of the product, operational activity, or supplier before any mitigating actions (controls) are taken to alter the risk's potential impact or likelihood of occurring.

ColCap is inherently exposed to a high level of modern slavery risk given the global nature of our products, operations, and supply chain. We consider the overall residual risk of modern slavery in our products, direct operations, and supply chain to be moderate. This is due the non-complex nature of our business, our highly skilled nature of our professional workforce, robust Board level oversight, our policies and controls, our approach to supplier governance, and having an accessible whistleblower mechanism.

No direct suppliers were based in any of the ten high risk countries that are taking the least action to respond to modern slavery<sup>1</sup>.

### A Continually Evolving Risk

We recognise that modern slavery occurs at one end of a spectrum, ranging from decent work and respect for human rights, through to substandard working conditions and serious exploitations of human rights. ColCap understands that a person or group's experience may move on this spectrum over time or be disproportionately impacted where underlying vulnerabilities exist, creating challenges in identifying instances of modern slavery.

The Group's exposure to modern slavery risks is expected to change over time, as our business changes or as external factors influence our exposure.

<b>As a financial services provider</b>	The risk that a customer or group of customers may be vulnerable to exploitation, are already exposed to / experiencing modern slavery, or misuse our products to facilitate or benefit from activities that involve modern slavery.	<input type="radio"/> Cause <input checked="" type="radio"/> Contribute <input checked="" type="radio"/> Directly Linked <input type="radio"/> No Involvement
<b>As a provider of wholesale securities</b>	The risk that securities placed in the market by ColCap are taken up by investors who are connected with, facilitate, or benefit from modern slavery.	<input type="radio"/> Cause <input checked="" type="radio"/> Contribute <input checked="" type="radio"/> Directly Linked <input type="radio"/> No Involvement
<b>As a Service provider</b>	The risk that parties (who we provide services to) use our services to facilitate or benefit from activities that involve modern slavery or that they perpetrate, rely on, or benefit from, modern slavery in their own products, operations, and / or supply chains.	<input type="radio"/> Cause <input checked="" type="radio"/> Contribute <input checked="" type="radio"/> Directly Linked <input type="radio"/> No Involvement
<b>As an employer</b>	The risk that our workers (including contractors) are exploited, prevented from exercising their labour rights, or subjected to seriously unfavorable / adverse working conditions that are incompatible with their human rights.	<input checked="" type="radio"/> Cause <input type="radio"/> Contribute <input type="radio"/> Directly Linked <input type="radio"/> No Involvement
<b>As a supporter of communities</b>	The risk that our sponsorships, partnerships, grants or charitable donations allow the recipients or people / entities associated with them to facilitate or benefit from activities that involve modern slavery.	<input type="radio"/> Cause <input checked="" type="radio"/> Contribute <input checked="" type="radio"/> Directly Linked <input type="radio"/> No Involvement
<b>As a purchaser of goods and services</b>	The risk that we procure goods (or that there are components within goods that we procure) that are manufactured or sourced using modern slavery or that we procure services from a provider that connected to, facilitates, or benefits from modern slavery.	<input type="radio"/> Cause <input checked="" type="radio"/> Contribute <input checked="" type="radio"/> Directly Linked <input type="radio"/> No Involvement

1. As defined in the Global Slavery Index 2023.

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## ACTION | 2023 SUMMARY

**Across 2023, ColCap delivered several key actions as we continued to mature our modern slavery practices in our operations and supply chains. We have been monitoring the effectiveness of our processes and procedures to address modern slavery risk that our business could cause, contribute to, or be directly linked to.**

This page summarises the key actions in relation to Modern Slavery that were undertaken by ColCap in 2023. Modern slavery risk is proactively managed via the group-wide Governance, Risk, and Compliance (GRC) Framework.

### Embedded Our Framework

Across 2023 ColCap continued work on embedding our Modern Slavery Framework (Framework). The framework assists and guides us in identifying and managing our modern slavery risks in our operations and supply chains. *Note: This framework is being uplifted into a Management Standard as part of our revised governance approach across the Group.*

### Embedded Whistleblowing

Following its initial implementation in 2022, we undertook further training and awareness activities to embed a culture of 'speaking up' within our business. Modern slavery is a form of reportable conduct under ColCap's Whistleblowing Standard. Through this mechanism, employees or workers within our supply chain can report any concerns anonymously through our third-party whistleblower hotline.

### Increased Internal Awareness

We continued to promote internal awareness of modern slavery and its risks across our operations and supply chain across the year through various activities. We have proactively encouraged our staff in all geographies to be aware of what Modern Slavery can look like and remain vigilant.

### Rolled-out Updated Internal Training

We implemented updated modern slavery training (via our digital learning platform as a mandatory annual module for all employees and contractors) that included information on how to identify and respond to modern slavery risks and red flags.

### Continued Implementation of Contract Clauses

For all new material supplier engagements, we continued to implement modern slavery compliance clauses in the relevant contracts and other documents that we rely on to manage our supplier arrangements and interactions.

### Reaffirmed Our Supplier Code of Conduct

We have reiterated to our material suppliers the needed for them to meet our Supplier Code of Conduct which outlines our expected behaviors in relation to the human rights of all people providing services to ColCap. We restated our absolute commitment to ensuring that all people are respected.

### Uplifted Our Supplier Questionnaire

As part of our annual cycle of reviews, we enhanced the level and scope of questions that we asked our suppliers about their own modern slavery risk exposure and actions. We sought to gain a better understanding of where suppliers that are used by our suppliers may be operating in high modern slavery risk jurisdictions.

### Established Our ESG Working Group

We have established a Group-wide working group for Environmental, Social, and Governance matters, including modern slavery. The working group is led by the Group's Chief Operations Officer (COO) and includes key staff with specialist subject matter expertise from across our business.

**ColCap recognises that modern slavery is continually evolving. We remain vigilant about and mindful of its many forms.**



Child Labour



Human Trafficking



Debt Bondage



Deceptive Recruiting



Slavery



Servitude



Forced Labour



Forced Marriage

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## ACTION | OUR POLICIES & COMMITMENTS

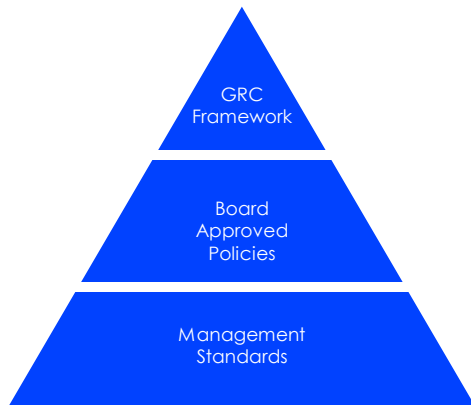
### Governance Instruments For Modern Slavery

We continue to draw on applicable legislation and regulatory guidance along with the operational principles outlined by the UNGPs, to inform how we address the risk of modern slavery through our policies and commitments. To address potential and actual modern slavery risk exposures across the ColCap Group, we maintain the frameworks, policies, standards, and codes that are listed in the table on the right.

Our staff and suppliers are held accountable against the minimum requirements and expectations set out in these instruments. Material breaches / failures are addressed via our internal consequence management mechanisms (for staff / contractors) and contractual mechanisms (for suppliers).

### GRC Hierarchy

The Group uses a three-tier GRC hierarchy that covers modern slavery. Our policies set out our principles and each management standard sets out the minimum requirements (including expected controls) that our business areas must meet.



Policy / Commitment	Description	<span style="color: blue;">●</span> Under Development / Review During 2023
<b>Governance, Risk, and Compliance Framework</b>	Our GRC Framework is the peak instrument for the management of risk (including modern slavery risk) across the Group. It sets out our intent along with the overarching structures and key components.	
<b>Risk Appetite Statement (RAS)</b>	The Risk Appetite Statement expresses the risk-taking limits that have been set by ColCap's Board. They inform our decision making and the key risk indicators highlight the level of risk that is present in our business.	
<b>Governance Policy</b>	The Governance Policy sets out the basis for the Groups structured approach to ensuring that the right decisions (as seen over the long term) are made in line with regulatory and community expectations.	
<b>Social and Environmental Responsibility Policy</b>	This Policy seeks to ensure enduring prosperity for our stakeholders and communities. In the Policy, we have identified the protection of human rights as a priority for the Group.	
<b>Modern Slavery Standard</b>	Previously known as our Modern Slavery Framework, the Standard formalises our approach to and the minimum requirements for managing the risk of modern slavery across the Group.	
<b>Whistleblowing Standard</b>	Our Management Standard for Whistleblowing formally recognises that modern slavery breaches form part of misconduct that can be reportable.	
<b>Consequence Management Standard</b>	The Group's Consequence Management Standard sets out how we identify, grade, and respond to misconduct and material breaches (deliberate or inadvertent).	
<b>Assurance Standard</b>	This Management Standard provides the basis for how ColCap ensures that we are meeting our obligations in a safe and effective manner. It encompasses the validation of our modern slavery commitments.	
<b>Code of Conduct and Business Ethics</b>	ColCap's Code of Conduct and Business Ethics applies to everyone who has been engaged by the group to perform a role within our business. It provides clear expectations for how our people are to behave.	
<b>Supplier Code of Conduct</b>	Our Supplier Code of Conduct sets out minimum expectations (including those related to modern slavery) that we require suppliers to meet.	

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## ACTION | KEY ACTIONS IN 2023 AND PLANNED ACTIONS IN 2024

### Detection, Investigations, & Response

When a modern slavery concern is raised, the Group conducts any required investigations in accordance with regulatory requirements along with our stated policy and procedures. This may include reporting the matter to law enforcement. In some instances we may raise a Suspicious Matter Report with AUSTRAC.

Should a SMR be raised, this may also trigger 'tipping off' provisions under section 123 of Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth), which can limit the Group's ability to disclose details of reported matters.

Possible instances of modern slavery may also be identified, investigated, and addressed indirectly through of alternate risk management activities, particularly those related to customer onboarding, financial crime management, and human resource management.

Depending on the situation, ColCap may engage directly with a supplier, third party, or customer to better understand how they are responding to instances of modern slavery. Following this engagement, we may include relevant clauses in contracts, may terminate an agreement, or exit a relationship where it is determined that the party is not managing their response appropriately.

Our ongoing risk management activities across the Group did not detect a modern slavery incident related to our products, operations, or direct supply chain in 2023. We will continue to enhance our ability to identify modern slavery incidents (including those beyond our direct supply chain) in 2024. Our planned actions in this area will allow us to improve the linkages between our identification of risk, design of controls, and detection / reporting / learning from incidents. There were no Whistleblower cases directly associated with modern slavery. The Group did not identify any instances of possible human exploitation by our customers during 2023.

### Partnering For Success

The Group partners with a range of external organisation to improve the reach and effectiveness of our risk management approach and activities. In 2024 we are seeking to leverage external inputs and data to improve our supplier risk rating assessments.

### Strengthening Our Approach To Human Rights

ColCap has taken several steps to improve the way we consider and address the human rights impacts by enhancing our understanding of these risks. We have sought to embed our commitments in relation to human rights within our GRC Framework and made several updates to our related governance instruments, including those related to vulnerable customers, and ESG.

Our focus on human rights has also continued to enhanced training that supports capability building for our people. Across 2024 we will be seeking to improve the way in which we monitor and report on our human rights impact. The Group will continue to strengthen the way that we respond to and remediate adverse human rights impacts where we identify that we have caused, contributed to, or are directly linked to them.

### Relationship To Financial Crime

In addition to modern slavery risk, customers who are engaged in modern slavery may pose money laundering risks to the Group. For example, customers may launder the proceeds from slavery and cash activity associated with human trafficking through their accounts, or via our loan products. We undertake customer due diligence and transaction monitoring activities to identify, manage and mitigate the risk that its products and services might be used to launder money or fund terrorism. These activities may identify modern slavery activity by customers of ColCap and require appropriate responses.

#### Key Actions In 2023

<b>Ongoing Risk Assessment</b>	We regularly considered our assessment of modern slavery risk within the context of operating environment change, business change, and new supplier arrangements.
<b>Supplier Contract Clauses</b>	We sought to ensure that contracts with material suppliers contained appropriate modern slavery clauses.
<b>Annual Material Supplier Questionnaire</b>	Our suppliers were asked to tell us about their exposure to, risk assessment of, and actions in relation to modern slavery.
<b>Training &amp; Awareness</b>	Staff ad contractors across the Group undertook a range of online training courses to improve their understanding of modern slavery.
<b>Whistleblower Hotline</b>	We maintained our independent and externally accessible whistleblower hotline so there was an anonymous way of raising modern slavery concerns.

#### Planned Actions In 2024

<b>Governance</b>	Conduct modern slavery maturity assessment to inform 2025 planning and uplift.
<b>Awareness &amp; Capability</b>	Improve modern slavery awareness in conjunction with the parties who use our services.
<b>Stakeholder Engagement &amp; Due Diligence</b>	Establish a contract clause deviation and controversies register and introduce digital questionnaires for supplier monitoring.
<b>Assurance</b>	Conduct targeted assurance across select high-risk tier one suppliers and review modern slavery control designs.

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## EFFECTIVENESS & ENTITY CONSULTATION

ColCap is committed to conducting our business in a way that respects human rights and reduces the risk of modern slavery. Our focus has been on implementing our updated training / awareness actions along with our enhanced due diligence approach. We have sought to further incorporate our UK businesses into our Group-wide approach to modern slavery.

We recognize that our approach, must be supported by processes to help identify and understand where high risk areas exist and that effective controls mitigate them appropriately (including having the capability to respond to actual or alleged incidents).

### Measuring Effectiveness

Defining metrics that measure success in uncovering, identifying and managing modern slavery risk is challenging and an evolving discipline. We look at quantitative and qualitative measures to track our progress, inform improvements to our approach, and measure our overall effectiveness across our modern slavery program of work during each financial year. We continue to identify new measures of effectiveness as our approach to modern slavery evolves and new industry benchmarks are established.

We continually assess the effectiveness of our actions in identifying and managing modern slavery risks. Our actions include regular consideration of our corporate governance along with tracking our actions and outcomes. We regularly review our supplier onboarding and monitoring processes. We also review the effectiveness of our policies, procedures, processes, incident reporting, grievance mechanisms and other business reporting.

### Future Focus

The Group plans to review our effectiveness measures in 2024 as part of our continuing efforts to

Focus Area	Measure	2023 Outcome
Governance	Board Risk Committee Meetings	4
	Modern slavery policy breaches	0
Awareness & Capability	Staff / contractor completion of modern slavery training (online)	100%
	Staff / contractor completion of vulnerability training (online)	100%
	Staff / contractor completion of whistleblower training (online)	100%
Stakeholder Engagement & Due Diligence	New supplier contracts with appropriate modern slavery clauses	100%
	Suppliers that completed our 2023 modern slavery questionnaire	71
	Formal requests for proposal that included modern slavery questions.	100%
Assurance	External auditor concerns / qualifications in relation to modern slavery	0

enhance our approach to modern slavery. We will incorporate aspects of our planned maturity assessment in how we determine the success and effectiveness of our improvement efforts across the 2024 year.

### Entity Engagement & Consultation

ColCap reviewed its related bodies corporate and Trusts in order to assess and reconfirm which entities met the threshold for being a reporting entity under the Australian Act and UK Act in 2023.

We maintained ongoing engagement and

consultation across the Group on our collective assessment of and actions in relation to modern slavery during 2023. There was regular contact between our Board and Management, including relevant business areas and the Legal Risk and Governance (LRG) team. This engagement and consultation facilitated collaboration between business representatives (which cover our owned and controlled entities) and subject matter experts on the requirements and preparation of this Statement, as well as identification, assessment and management of modern slavery risk across our business, including supporting tools and resources.

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## REPORTING CRITERIA & APPROVAL

Australian Commonwealth Modern Slavery Act 2018 Mandatory Reporting Criteria	United Kingdom's Modern Slavery Act 2015 Requirements	ColCap's 2023 Modern Slavery Statement Page Reference
1) Identify the reporting entity.	N/A	Page 2
2) Describe the structure, operations and supply chains of the reporting entity.	54(5)(a) the organisation's structure, its business and its supply chains	Pages 3 to 5
3) 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.	54(5)(d) the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	Pages 6 to 7
4) 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.	54(5)(b) its policies in relation to slavery and human trafficking; (c) its due diligence processes in relation to slavery and human trafficking in its business and supply chains; and (f) the training about slavery and human trafficking available to its staff	Pages 8 to 10
5) Describe how the reporting entity assesses the effectiveness of such actions.	54(5)(e) its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	Page 11
6) Describe the process of consultation with any entities that the reporting entity owns or controls. In the case of a reporting entity covered by a statement under section 14 – the entity giving the statement.	N/A	Page 11
7) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A	N/A

### ColCap strives to continually improve our approach to identifying, assessing, and managing modern slavery risks across our operations and supply chains globally.

In accordance with the requirements of section 14(2)(d) of the Australian Modern Slavery Act and section 54(6)(a) of the UK Modern Slavery Act, this Statement was approved by the Board of ColCap Financial Limited (as the *principal governing body*) on 24 June 2024.

ColCap Financial Limited is a 'higher entity' within the meaning of section 14(2)(d)(ii) of the Australian Modern Slavery Act 2018, being the entity in a position to influence or control the other entities covered by this Statement.

This Statement is signed by Jane Tongs as the *responsible member* in her role as Chair of ColCap Financial Limited.



**JANE TONGS** | CHAIRPERSON  
24 June 2024

#### Not Advice

This statement contains general information only and is not intended to provide any form of advice. You should consider whether the information in this statement is suitable for your needs and we recommend that you seek professional advice.

#### No Liability

To the extent permitted by law, no liability is accepted by ColCap Financial Limited or any of its related bodies corporate for any loss or damage as a result of any reliance the information contained within this statement.

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