

FINDEX

Modern Slavery Statement

2021-2022 Australian
Financial Year

1 July 2021 – 30 June 2022

findex.com.au

Modern Slavery Statement

Statement

This Modern Slavery Statement, made by Findex (Aust) Pty Ltd (Findex), is made in compliance with the *Modern Slavery Act 2018 (Cth)* (the "Act") and has been prepared in respect to the financial year ending 30 June 2022. Findex acknowledges responsibility under the Act and will ensure transparency in respect to the organisation and its suppliers of goods and services.

As a good corporate citizen, Findex is dedicated to operating in an ethical and law-abiding manner and expects our suppliers to share these values. We seek to minimise the risk of modern slavery occurring in our operations and supply chains.

The purpose of this statement is to outline Findex's approach to ensuring our business and supply chains are conducted within a framework that mitigates modern slavery risk.

Findex had committed to continuous improvement and undertaking proactive steps to ensure that modern slavery does not occur in our own business and supply chains, particularly within our internal risk and procurement functions.

With a number of key actions adopted in FY21, Findex has delivered upon on its FY2022 improvement key focus areas including:

- Continued organisational-wide awareness and stakeholder engagement on the modern slavery compliance requirements, including socialisation of the Modern Slavery Policy and e-learning module to all employees (some of which were mandatory for specific business areas and roles)¹
- Development of modern slavery key performance indicators and integration into the Findex sustainability reporting.

During FY2022, systems and processes have been introduced to track and monitor modern slavery key performance indicators, including:

- The number of modern slavery training and awareness-raising programs completed by Employees.
- The number of completed Findex Supplier Questionnaires.
- The number of supplier contracts that included modern slavery clauses.

The Board of Directors have validated this statement and the approach to be compliant with the Act.

Our structure and operations

Findex (Aust) Pty Ltd ABN 84 006 466 351 is a subsidiary of Findex Group Limited ABN 40 128 588 714 (Findex Group). As one of the largest privately-owned providers of integrated financial advisory and accounting services in Australia and New Zealand, Findex Group has 2,7000 staff, geographically dispersed throughout 100 offices. With \$17bn under advice, our business has more than 30 years' experience delivering business advisory, wealth management, audit, performance consulting, accounting and tax services. Findex Group is the fifth largest accounting firm in Australia and 95% of our Partnership group across Australia and New Zealand are equity holders in our business.

Findex Group exists to enrich the lives of the people, businesses and communities we work with through smart solutions, a one best way approach and an integrated delivery method via our Family Office model (Diagram 1). Findex Group understands the importance of a holistic service offering that enables its clients to meet their goals, needs and expectations.

¹i.e. those involved in procurement processes

This approach encompasses:



Wealth Management



Specialist Services, including Specialist Tax



Self-Managed Superannuation Fund Administration and Advisory



Business Advisory



Lending



Corporate Finance



Tax Advisory



Audit and Assurance



Accounting



Corporate Benefits



Risk Insurance and General Insurance



Risk and Management Consulting

Findex Group Limited is governed by a Board. The Board has ultimate responsibility for the Group's internal quality control and risk management.

The responsibility for managing the day-to-day operations of the Findex Group is held within the Management Team. This includes responsibility for developing, implementing and monitoring quality control and risk-related matters. The management team comprises of our Senior Leaders.

During the reporting period that this statement covers, the Risk Management team has actively engaged and consulted with the broader Management Team and updated the Board with progress as we continue to mature our approach to modern slavery processes and deliver upon our key focus areas outlined in our FY22 statement.

The Findex Modern Slavery Policy has been approved which includes details of the Acts reporting requirements and information regarding the actions taken to address these requirements. The policy applies to all Findex Senior Executives, Directors, employees, secondees, consultants and contractors in all businesses and subsidiaries (including offshore locations), within Findex Group.

The Management Team have oversight of all entities which Findex Group owns.

Supply chains

Findex's supply chains consist of goods and services which support our corporate operational departments and client-facing service lines. Findex largely operates in a sector that is generally considered a low risk for modern slavery, however, we recognise we can be indirectly exposed to modern slavery risks through our supply chains.

The majority of goods and services Findex procures are acquired from locally based suppliers in our operating countries of Australia and New Zealand. Excluding remuneration, our major categories of procurement include:

- Rent and infrastructure (facilities management: cleaning, parking, energy, etc.).
- IT and communications (including software).
- Professional fees (consultancy, audit fees, etc.).
- Travel and entertainment.
- Marketing and merchandising.
- General office costs (postage, stationery, etc.).
- Human Resources (professional development, recruitment, staff welfare, etc.).

Findex's internal Property and Procurement and Risk Management teams complete a risk screening on existing suppliers as part of our documented process to monitor suppliers who may pose a higher modern slavery risk. These suppliers included facility service providers (e.g. cleaning and premises maintenance), technology hardware providers, Findex merchandise and uniform suppliers, and offshore outsourcing suppliers. To mitigate any associated risks, these suppliers are sent a modern slavery questionnaire, with the intention of validating that the supplier is adequately addressing modern slavery risks or if additional action is required. No adverse responses have been provided to date.

Findex Group has several policies in place which guide our staff and promote a culture of compliance, honesty, and ethical behaviour. The most relevant policies and procedures we have in place, which mitigate against the risk of modern slavery, include:

- Code of Conduct
- Whistle-blower Policy
- Fraud and Corruption Policy
- Expense Policy
- Procurement Policy

During FY23, our Procurement Policy will be reviewed and updated to establish clear principles in our procurement processes to ensure they are effective in achieving our economic, environmental and social objectives. In addition, the processes ensure that any new suppliers being onboarded continue to be assessed for modern slavery risks.

Findex Group has a whistleblowing process which allows employees to report instances of improper conduct. The Whistle-blower Policy comprises several policies and codes that promote a culture of compliance, honesty and ethical behaviour within Findex.

During FY22, Findex Group developed a Sustainability Strategy, which addresses environmental, social and governance pillars. Findex Group also completed our materiality assessment which identified key material topics to be addressed within our strategy. Some of our defined material boundaries include respecting human and labour rights within our workforce, operations and supply chain and mitigating the risk of modern slavery occurring in our operations and supply chains.

Findex Group's **Sustainability Strategy** was launched on 1 July 2022 and outlines our targets and initiatives across environmental, social and governance pillars from FY23 - 27. Our strategy set a target of all our supplier agreements assessed for modern slavery by Property and Procurement staff and that those key staff are engaged and understand modern slavery compliance requirements. Sustainability reporting will present performance on our material boundaries and initiatives addressing our Modern Slavery Statement.

The key metric that Findex Group uses to assess our effectiveness in combatting modern slavery in our operations and supply chains is the number of suspected modern slavery incident reports received. During FY22 there were no reports of modern slavery with Findex Group operations or supply chains.

If modern slavery related issues are identified, Findex Group will work with the supplier to develop corrective actions with agreed deliverables and timeframes as part of a remediation plan.



Diagram 1: Integrated delivery method via our Family Office model

If we identify suspected situations of modern slavery in Findex Group's operations or supply chain, Findex Group will adhere to the procedure outlined within Findex Modern Slavery Policy, to ensure this is reported appropriately.

Findex Group has adopted a continuous improvement approach to our modern slavery processes. During FY23, our key focus will be:

- Continued focus on systems and processes which have been introduced, including:
 - Tracking and monitoring modern slavery key performance indicators.
 - Monitoring developments in modern slavery regulatory reform.
 - Ensuring that Findex is appropriately positioned to adhere to future requirements.
- Findex will review and update our Procurement Policy to advance environmental, social and governance objectives aligned with our Sustainability Strategy. Progress against these targets will be reported annually within our Sustainability Report. Within our strategy, Findex seeks to become a UN Global Compact Signatory by the end of FY25 and will incorporate the 10 principles across human rights, labour, environment and anti-corruption.

Matt Games
Co-Chief Executive Officer
Findex (Aust) Pty Ltd
5 December 2022

Tony Roussos
Co-Chief Executive Officer
Findex (Aust) Pty Ltd
5 December 2022