



Joint Modern Slavery Statement

30 June 2023

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01. Introduction

This Modern Slavery Statement (**Statement**) is Finder's second Statement and covers the period 1 July 2022 to 30 June 2023 (**Reporting Period**).

This Statement has been prepared in accordance with the Modern Slavery Act 2018 (**Australian Act**) in Australia and the Modern Slavery Act 2015 (**UK Act**) in the United Kingdom and applies to the following subsidiaries of Finder.com Pty Ltd (**Finder**), which are reporting entities under the applicable Act:

- **Australian Act:** Hive Empire Pty Ltd (trading as 'finder.com.au'); and
- **UK Act:** Finder.com UK Comparison Ltd.

Finder recognises the prevalence of modern slavery across the globe and the devastating impact it has on communities and individuals. As such, we have a zero-tolerance approach to any form of forced labour and remain committed to upholding the protection of human rights in our operations and supply chain.

02. About us



OUR OPERATIONS

Finder commenced operations in 2006 and since then, has become a global provider of product and service comparison and personal finance management services for consumers. Our mission is to equip consumers with the tools and information they need to be able to make better financial decisions. We do this by publishing factual information of a general nature on our Australia, Canada, UK and USA websites to enable consumers to:

- Easily research and compare products and services (across personal banking, credit, insurance, utilities, travel, shopping and more) offered by third-party providers (**partners**);
- Read our internal expert reviews of products and services;
- Stay abreast of industry-related news and insights; and
- Read educational and informative content, such as our articles and “how-to” guides, to improve their financial knowledge and make informed purchase decisions.



OUR VALUES

We are a purpose-led business that acknowledges our responsibility to help a broad range of stakeholders. One of our company values is to “empower people” and this value calls on our crew to put people at the centre of their decision making on both internal and external projects. This Statement and the associated initiatives has been compiled and managed by our Modern Slavery Working Group that is made of representatives from our Business



OUR CORPORATE STRUCTURE

Operations, People & Culture, Legal and Finance functions.

Finder operates in Australia, Canada, UK and USA through Finder.com Pty Ltd’s subsidiaries, namely:

- **Hive Empire Pty Ltd (trading as ‘finder.com.au’):** the operating subsidiary responsible for www.finder.com.au, www.findershopping.com.au and www.top10petinsurance.com.au. Hive Empire Pty Ltd holds an Australian Credit Licence and is authorised as a Corporate Authorised Representative (432664) of Finder.com.au Pty Ltd’s Australian Financial Services Licence (547310).
- **Finder.com Comparison UK Ltd:** the operating subsidiary responsible for www.finder.com/uk (including the employment and outsourcing of human resources in the UK to Finder for deployment in its local operations). Finder.com Comparison UK Ltd is authorised by the Financial Conduct Authority (786446).
- **Finder.com Comparison Service Canada, Inc:** the operating subsidiary responsible for www.finder.com/ca (including the employment and outsourcing of human resources in Canada to Finder for deployment in its local operations).
- **Finder.com LLC:** the operating subsidiary responsible for www.finder.com (including the employment and outsourcing of human resources in the USA to Finder for deployment in its local operations).
- **Creditcard.com.au Pty Ltd:** the operating subsidiary responsible for credit card, debit card and prepaid card

comparison on www.creditard.com.au and www.debitcards.com.au. Creditcard.com.au Pty Ltd is 100% owned by Hive Empire Pty Ltd.

- **WhatPhone Pty Ltd:**
the operating entity for mobile phone and broadband plan comparison on www.whatphone.com.au. WhatPhone Pty Ltd is 100% owned by Finder Ventures Capital 1 Pty Ltd which is a wholly owned subsidiary of Finder.com Pty Ltd.
- **Finder Ventures Pty Ltd:**
the operating subsidiary that owns and operates the Finder mobile application in Australia.
- **Finder Wallet Pty Ltd:**
the operating subsidiary for Finder’s cryptocurrency trading service in Australia.
- **Finder Crew Pty Ltd:**
the local subsidiary that employs crew in Australia and outsources Australian crew to Finder for deployment in its operations.
- **Finder Philippines ROHQ:**
the local subsidiary that employs crew in the Philippines and outsources Filipino crew to Finder for deployment in its operations.
- **Finder.com Poland sp. z. o.o:**
the local subsidiary that employs crew in Poland and outsources Polish crew to Finder for deployment in its operations.

Finder’s corporate structure is set out in Appendix A to this Statement.



OUR OPERATIONS

Finder is headquartered in Sydney, Australia and also has international offices in:

- New York, USA;
- London, UK; and
- Wroclaw, Poland.

During the Reporting Period, Finder engaged approximately 300 “crew” (consisting of permanent and temporary employees) to perform skilled roles in digital publishing, copywriting, software engineering, product management, marketing, public relations, customer care, finance, cybersecurity and legal. Crew in Australia, Canada, Philippines, Poland, UK and USA were engaged by Finder pursuant to an outsourcing arrangement with their local subsidiary employer.

Approximately 50% of our crew were based in Australia, 3% in Canada, 10% in the Philippines, 12% in Poland, 11% in the UK and 10% in the USA. The remaining 4% of crew were based internationally in:

| COUNTRY | NUMBER OF CREW |
|----------------------|----------------|
| Bangladesh | 2 |
| India | 3 |
| Italy | 1 |
| Lithuania | 1 |
| Mexico | 1 |
| Netherlands | 1 |
| New Zealand | 1 |
| Pakistan | 1 |
| Singapore | 2 |
| Spain | 1 |
| United Arab Emirates | 1 |

In addition to our crew, we also engaged approximately 73 independent contractors/freelancers on a temporary basis through Upwork Global Inc. (**Upwork**), Finders external independent contractor/freelancer hire platform (refer to section 3.2 of this Statement for more information).

OUR SUPPLIERS

In the Reporting Period, we acquired goods and services from over 600 direct suppliers to facilitate our operations. Our suppliers mainly consisted of multinational organisations to small businesses in Australia, Canada, UK and USA, including:

- business and professional services (accounting and legal firms);
- office-related services (leased office premises, utilities (energy and broadband), catering and cleaning);
- computer hardware suppliers;
- computer software suppliers (Google and AWS cloud hosting and infrastructure, cybersecurity and data analytics);
- advertising services (digital advertising on third-party social media platforms and websites, such as Facebook and PR/media agencies); and
- independent contractors, freelancers and consultants outsourced through Upwork.

Over 62% of our annual procurement spend in the Reporting Period was attributable to cloud-based hosting, infrastructure and advertising services supplied by US-based multinationals, Google, Amazon Web Services and Facebook.

03. Our Risk Areas

RISK ASSESSMENT METHODOLOGY

We refreshed our initial supply-chain map to identify any material changes in Finder's supply chain structure and resulting risk trends. The objective of this exercise was to re-evaluate Finder's "low" modern slavery risk rating for the Reporting Period by assessing, against external data and research such as the Global Slavery Index:

- industry and types of goods and services supplied;
- geographic location of supplier operations;
- visibility over supplier operations;
- nature of labour arrangement and practices; and
- existing or planned modern slavery risk mitigation.

No material changes or adverse findings were made in the course of our assessment. As such, we have maintained our "low" rating for modern slavery risk for the Reporting Period.

OUR RISK AREAS

We continue to assess the inherent risk of modern slavery practices within our direct operations as "low" due to the majority of our crew being employed in highly skilled roles and based in countries with strong labour laws and human rights protections, such as Australia, Canada, UK and USA. According to Global Slavery Index data, these markets are assessed as having a low prevalence of modern slavery practices.

We do not consider the location of remote crew in the Philippines and Poland to affect our "low" risk rating. Our global People

policies regarding compensation, time-off, whistleblower reporting and grievance handling apply to all crew, regardless of their country of residence. All crew are engaged pursuant to a written employment agreement that upholds their employment entitlements and benefits in accordance with applicable labour laws (after obtaining further advice from external local legal counsel). We honour our commitment to our crew on an ongoing basis, for example by undertaking an annual company-wide review of crew compensation to ensure that all crew continue to be paid above their country's applicable minimum wage and ensuring global application of our People policies related to compensation, time off, grievance handling and whistleblower reporting.

In the Reporting Period, we engaged approximately 73 independent contractors through Upwork on a temporary basis, the majority of which were identified as located in a country assessed as having higher prevalences of modern slavery, including:

| COUNTRY | NUMBER OF UPWORK CONTRACTORS |
|----------------------|------------------------------|
| Brazil | 3 |
| India | 4 |
| Lebanon | 1 |
| Mexico | 7 |
| Nepal | 2 |
| Philippines | 51 |
| United Arab Emirates | 1 |

Notwithstanding their country of residence, we consider that there is a low risk of the occurrence of modern slavery in connection with our arrangement with Upwork, based on the skilled nature of the roles our Upwork contractors were deployed to, across our Publishing and Editorial, Finance, People and Culture, Marketing, Client Services, Product and Technology, Data/Analytics and Marketing teams. Additionally, the results of our due diligence and assessment of Upwork's modern slavery practices satisfied us that Upwork had implemented appropriate controls and measures to address such risks. Specifically, we considered Upwork's:

- **Global Human Rights Policy:** outlines Upwork's commitment to honour internationally recognised human rights principles and the expectations of its team members and suppliers.
- **Human Rights Commitment:** outlines the steps taken by Upwork to address possible human rights risks across its operations, supply chain and on its work marketplace.
- **Supplier Code of Conduct:** outlines the expectations of Upwork's suppliers in relation to human rights and fair labour practices, and the specific steps taken by Upwork to address human rights risks across its supply chain.

We outsource the back-end operations and customer support capabilities required to operate www.energy.finder.com.au to CIMET Sales Pty Ltd (**CIMET**). Although CIMET is a private company incorporated in Australia, the personnel it deploys to Finder are based in India, which is a country assessed with a higher prevalence of modern slavery practices. Accordingly, we regularly engage in dialogue with CIMET and undertake monthly monitoring and reporting to ensure timely identification and resolution of issues. CIMET is also subject to a contractual

agreement with Finder which contains explicit commitments from CIMET to comply with applicable laws. As at the end of the Reporting Period, Finder has not been notified of any suspected or actual incident regarding modern slavery in CIMET's operations or supply chain.

Our sector-based risk assessment was substantiated by resources from the Walk Free Foundation and the Australian Border Force. Our analysis of the data indicates that our primary suppliers in terms of spend are in low-risk sectors such as cloud software and advertising services. That said, we did identify suppliers from higher-risk industries such as cleaning services, catering services and clothing production, however these suppliers represent a small proportion of our overall spend.

04. Our Actions

In the Reporting Period, we undertook the following initiatives to address the risks of modern slavery in our operations and supply chain:



STRENGTHENED SUPPLIER GOVERNANCE

We strengthened our supplier governance by implementing further checks and controls to adequately assess and manage the modern slavery risks presented by new suppliers, and renewing suppliers on an annual basis.

Prior to engaging or renewing a supplier, our Business Operations team kick-off the supplier assessment process, seeking consultation from our Legal and/or Security teams, where identified as required. Legal and Security teams document their assessment of the risks that may potentially arise in relation to the supplier, and the recommended controls for the treatment or mitigation of

the identified risks (which may take the form of proposed amendments to the supplier agreement, or review of the supplier's certifications and internal documentation). We understand that the onus is on Finder to take every reasonable precaution against modern slavery, not just taking the word of suppliers.



PEOPLE POLICY FRAMEWORK

Our ongoing commitment to upholding and protecting the human rights of our crew worldwide continues to be reflected in our Supplier Code of Conduct and our global and country-specific People policies, such as:

- Global Compensation Policy;
- Global Diversity and Inclusion Policy;
- Global Grievance Handling Policy;
- Global Safe Workplace Policy; and
- Whistleblower Policy.

As mentioned earlier in this Statement, we undertake annual reviews of each crew's compensation. This exercise includes benchmarking crew compensation against the market by geography, job family and job level each year, to ensure our compensation remains fair and competitive. We also conduct annual reviews of gender pay equity and minimum wages to ensure we pay fairly and equitably for work delivered.



PURCHASE ORDER AND PROFORMA MODERN SLAVERY TERMS

We finalised pro-forma modern slavery clauses for inclusion in our contractual agreements with suppliers identified as "high" modern slavery risk following our internal supplier onboarding/risk management assessment. Where our Legal team advises that it is necessary, the internal supplier relationship owner is assigned responsibility

for ensuring that the final supplier agreement incorporates our pro-forma clauses prior to execution/signature. This is critical to ensure that Finder obtains robust commitments from its suppliers in writing regarding the effective management and mitigation of modern slavery risks in the supplier's operations and supply chain. Should the supplier fail to comply, Finder would be able to enforce its rights under the supplier agreement, to either compel the supplier's compliance with the applicable clause or to cease its relationship with the supplier by terminating the arrangement early.



REDUCTION IN OUTSOURCED PERSON

Since the end of the Reporting Period, we implemented a cross-company and departmental restructure of Finder's operations. This resulted in a reduction in the number of contractors engaged internationally through any external labour hire platform.

We continue to monitor our arrangements with freelancer and contractor crew on a regular basis. We conduct periodic reviews against contractor employment types to reflect appropriate classifications and local working rights, and consult with external local legal counsel, where required.

We replaced Upwork with Deel, Inc. (**Deel**), another independent contractor/freelancer management platform, and continue to monitor our relationship with Deel closely to ensure that we retain a high level of oversight over its operations, including the wellbeing and treatment of outsourced crew. Deel undertakes initial and ongoing identity verification and background checks for all personnel outsourced through its platform to Finder. Through these checks, we are able to authenticate that the individuals we engage in

our operations are of good character and who they say they are.

05. Planned Future Actions

To continue to maintain oversight and management of modern slavery risks in our operations and supply chain, we intend to deliver on the following initiatives:

- Implement pro-forma purchase order and modern slavery terms and conditions in all new and renewal supplier agreements where supplier is internally assessed as "high" modern slavery risk;
- Operationalise finalised Supplier Code of Conduct in our procurement processes to better manage the ongoing risk of modern slavery with existing suppliers;
- Embed finalised Supplier Code of Conduct into existing supplier agreements; and
- Continue to closely work with and monitor Deel, particularly in respect of remote international crew located in higher risk countries such as Philippines, India, Bangladesh;
- Company-wide ongoing training and awareness of crew about modern slavery issues, measuring changes in awareness of risk, appropriate decision making and swift action as appropriate; and
- Continuing to review our grievance procedures and whistle-blowing procedures for reports of actual or suspected incidents related to modern slavery.

06. Assessing Effectiveness of Our Actions

As part of Finder's second Statement, we commit to assessing the effectiveness of the actions in place at least annually. This will be the responsibility of the Modern Slavery Working Group to remain accountable for its assessments and actions throughout the year.

We also recognise that each crew can contribute to combating modern slavery and consequently reporting of such risks will be included in our existing Compliance Breach Register. The handling of any modern slavery risks reported will be carried out in accordance with our Compliance Program, and will be tabled for discussion at the quarterly Compliance Committee meeting.

07. Consultation

In preparing this Statement, information concerning modern slavery risks and compliance has been obtained from key staff of each subsidiary of the Finder Group named in this Statement, and reviewed by the boards of each company.

08. Approval

This Statement was approved by the Board of Finder.com Pty Ltd on behalf of each of its subsidiaries named in this Statement on 18 July 2024.

Signed by:



Frank Restuccia
Founder, CEO, Executive Director

Finder Group Corporate Structure (30th June 2023)

