

MODERN SLAVERY STATEMENT 2021



YellowBrickRoad
Home Loans

1. MODERN SLAVERY STATEMENT

- 1.1 This Modern Slavery Statement (this Statement) is made by Yellow Brick Road Holdings Ltd (YBR) under section 14(1) of the Modern Slavery Act 2018 (Cth) (the Modern Slavery Act).
- 1.2 YBR is a reporting entity under the Modern Slavery Act. This Statement sets out the measures we are taking to ensure that modern slavery practices are not taking place within our organisation or our supply chain.

2. STRUCTURE OF YBR GROUP

- 2.1 YBR is a company incorporated in Australia and is listed on the Australian Securities Exchange (ASX). All the YBR related entities are wholly owned entities except Resi Wholesale Funding Pty Ltd (RWF) which is a 50 % joint venture with Magnetar Financial LLC.
- 2.2 The following companies form part of the corporate structure of YBR:

Name	Principal place of business / Country of incorporation	Ownership interest	
		2021 %	2020 %
Yellow Brick Road Group Pty Ltd	Australia	100%	100%
Skasgard Pty Ltd	Australia	100%	100%
Loan Avenue Pty Ltd	Australia	100%	100%
Carithas Pty Ltd	Australia	100%	100%
Boreanaz Pty Ltd	Australia	100%	100%
Yellow Brick Road Investment Partners Pty Ltd	Australia	100%	100%
ExchangeIQ Advisory Group Pty Ltd *	Australia	100%	100%
Yellow Brick Road Services Pty Ltd	Australia	100%	100%
Yellow Brick Road Accounting and Wealth Management Pty Ltd	Australia	100%	100%
Yellow Brick Road Financial Planners Pty Ltd	Australia	100%	100%
Yellow Brick Road Finance Pty Ltd	Australia	100%	100%
Yellow Brick Road Accounting and Taxation Services Pty Ltd	Australia	100%	100%
Yellow Brick Road Wealth Management Pty Ltd	Australia	100%	100%
Resi Mortgage Corporation Pty Limited	Australia	100%	100%
Vow Financial Holding Pty Limited	Australia	100%	100%
Vow Financial Group Pty Ltd	Australia	100%	100%
The Mortgage Professionals Pty Ltd	Australia	100%	100%
Vow Financial Pty Ltd	Australia	100%	100%
The Money Factory Pty Ltd	Australia	100%	100%
NBG Holdings Pty Ltd	Australia	100%	100%
Vow Wealth Management Pty Ltd	Australia	100%	100%
Ironbark Mortgage Solutions Pty Ltd	Australia	100%	100%
NBG Pty Ltd	Australia	100%	100%
FASA Pty Ltd	Australia	100%	100%
Australian Property Finance Pty Ltd	Australia	100%	100%
NBG Leasing Pty Ltd	Australia	100%	100%
Select Mortgage Finance Pty Ltd	Australia	100%	100%
Vow Financial Planning Pty Ltd	Australia	100%	100%
Loan Avenue Holdings Pty Ltd	Australia	100%	100%
Money Management Pty Ltd	Australia	100%	100%

* formerly known as Yellow Brick Road Investment Services Pty Ltd

Each of these companies is incorporated in Australia. In this Statement, YBR Holdings, together with its wholly owned subsidiaries and joint venture are referred to as 'YBR'. A reference in this Statement to 'we' or 'our' is a reference to the YBR Group.

3. YBR BUSINESS OPERATION

- 3.1 YBR's operations span across Australia and its employees are based throughout Australia. YBR's head office is in Sydney, New South Wales (NSW). YBR has 80 employees, with 73 employees in NSW and the rest based in other Australian states. It also has another office in Newcastle, NSW. YBR does not have any operations, staff or offices located in jurisdictions outside of Australia. YBR staff work across the YBR Group from its offices and remotely from home. The staff located in other states outside NSW work remotely from home.
- 3.2 YBR is a mortgage aggregator acting in an intermediary capacity between lenders and brokers. YBR facilitates mortgage/finance brokers accessing loans and financial products (residential mortgages, commercial loans, asset finance products and personal loans) from a range of lenders for their customer. YBR also provides business and learning support; compliance support and platforms to its brokers to assist with the running of their businesses. YBR also makes available to its brokers a range of insurance products for distribution to customers through a referrer arrangement with insurers. Insurance offerings include life insurance and general insurance.
- 3.3 RWF is a securitisation funding business with its primary role being the funding of home loans to Resi Home Loans through the process of securitisation.

4. SUPPLY CHAIN

- 4.1 The categories of goods and services procured are:
- technology services,
 - insurance,
 - residential property valuation,
 - banking and finance,
 - office space,
 - other professional services (including research and analysis, accounting, legal and consulting),
 - human resources,
 - credit bureaus,
 - travel,
 - cleaning,
 - office consumables,
 - hospitality and
 - catering services.

5. GOVERNANCE TO ADDRESS MODERN SLAVERY RISKS

- 5.1 Our board, executive and audit and risk committee provide direction and leadership to implement appropriate levels of governance. This includes ensuring, that in dealing with suppliers, our decisions are based on transparency integrity, responsibility and performance to promote the long-term sustainability and success of our business.
- 5.2 Suppliers are expected to ensure that all employees and contractors engaged within their business are legally entitled to work and that no forms of slavery or human trafficking are evident in the provision of products and services to YBR.
- 5.3 YBR has an established set of policies and procedures that governs the way it operates. Some of the policies outlined below are relevant to how YBR manages potential modern slavery related issues regarding its business operations and supply chain:
- (a) Risk Management Policy;
 - (b) Code of Conduct;
 - (c) Whistleblower Policy;
 - (d). Conflict of Interest Policy;
 - (e) Outsourcing Policy; and
 - (f) Compliance Manual

Our policies and procedures collectively demonstrate that we currently have in place the necessary arrangements to identify and assess potential modern slavery risks in our supply chain to mitigate the risk of modern slavery occurring in our supply chains.

- 5.4 YBR also has adequate monitoring systems in place to monitor potential risks of modern slavery. As a part of our control system to mitigate against modern slavery and associated risks in our supply chain we negotiate with our suppliers to include contractual provisions which require compliance with the Modern Slavery Act. Our employees who are involved in the procuring of goods and services will also assess the risk of modern slavery as a part of the due diligence exercise for all procurement.

6. RISK IDENTIFICATION, MANAGEMENT AND MITIGATION IN OPERATIONS AND SUPPLY CHAINS

- 6.1 YBR has undertaken a risk assessment of our operations and supply chain and based on our assessment we consider the risk of modern slavery in our organisation and supply chain to be very low.
- 6.2 YBR mainly deals with individuals, trusts, corporations, and partnerships whose offices and employees are located in Australia which is a low-risk location. We also ensure that goods and services we procure are predominantly from countries that have been identified as low-risk locations. If we procure any goods and services from overseas jurisdictions, we take into consideration the values and reputation of the supplier rather than focusing on price alone as part of our due diligence exercise.

7. EFFECTIVENESS OF OUR ARRANGEMENTS

- 7.1 As part of our compliance framework we assess the effectiveness of our system by conducting regular assessments of our suppliers contractual arrangements with us. The YBR Legal and compliance team also conducts reviews of the due diligence conducted by YBR staff to ensure that the necessary standards are being observed.

8. FUTURE COMMITMENTS

- 8.1 YBR Group will focus on reviewing and updating its Outsourcing policy with the aim of embedding the spirit of the Modern Slavery Act for new and existing supply arrangements. We will also be enhancing the training to the relevant employees involved in the procurement of products and services in our supply chain.
- 8.2 This Modern Slavery Statement is made by YBR for the financial year ending 30 June 2021. This Statement was approved by the Board of Directors of YBR.



Mark Bouris

Executive Chairman

Yellow Brick Road Holdings Ltd

APPENDIX 1

The table below outlines the mandatory Modern Slavery criteria (as set out in the Modern Slavery Act) and reference to the page within the YBR Modern Slavery Statement which addresses the requirements:

MODERN SLAVERY ACT REQUIREMENT	YBR MODERN SLAVERY STATEMENT
Identify the reporting entity	2. Structure of YBR Group
Describe the structure, operations and supply chains of the reporting entity	3. YBR Business Operation 4. Supply Chain
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	5. Governance to Address Modern Slavery Risks
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to address those risks, including due diligence and remediation processes	6. Risk identification, management and mitigation in Operations and Supply Chains
Describe how the reporting entity assess the effectiveness of such actions	7. Effectiveness of our Arrangements
Describe the process of consultation with any entities that the reporting entity owns or controls	2. Structure of YBR Group
Provide any other information that the reporting entity or the entity giving the statement considers relevant	8. Future Commitments