

2020 Modern Slavery Statement

This is Columbus Group's first Modern Slavery Statement which outlines the steps we have taken to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chains during the financial year ending 30 June 2020.

About the Columbus Group

This 2020 Modern Slavery Statement has been prepared in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)* and it covers the activities of Columbus Capital Pty Ltd ACN 119 531 252 (**Columbus**), as well as its trading name Origin Mortgage Management Services, its wholly owned subsidiary Homestar Finance Pty Ltd ACN 109 413 498 (**Homestar**) and its other subsidiaries and controlled entities within its Corporate Group (the **Columbus Group**).

Columbus's registered business address is Level 12, 77 Castlereagh Street, Sydney NSW 2000, Australia.

Modern Slavery Risk Appetite

In accordance with our Corporate Risk Appetite, the Columbus Group does not condone any form of slavery-like practices.

Columbus Group Business

Columbus is an Australian Financial Services Licensee and also an Australian Credit Licensee with its subsidiary Homestar and both are regulated by the Australian Securities and Investments Commission (**ASIC**). The Columbus Group operates in the Australian financial services and mortgage lending market and provides various loan administration, financial advisory, residential mortgage, consumer and commercial lending services. The Columbus Group has over \$6.5 billion of loan assets under management.

The Columbus Group has over 156 employees located in Australia and the Philippines. In the Philippines, its wholly owned subsidiary provides administrative and client services to the Columbus Group clients and customers.

Our Business and Supply Chains

We deal with a number of companies that supply us with a broad range of products and services. In many cases those companies also have extensive supply chains. In terms of modern slavery, we were particularly focused on those supply chains where there was a higher degree of sub-contracting and outsourcing to developing countries and we paid particular attention to our technology and IT hardware supply chains and/or any providers of our branded merchandise. Our supply chains also include the provision of office services and office supplies, such as cleaning and office hardware and stationery. We also have commercial relationships with mortgage managers and their brokers who provide loan referrals to the Columbus Group and these are stable long-term relationships.

Our major areas of spend fall within:

- IT and telecommunications;
- Business services which include banking services, security of systems, professional services, tools of trade, office services and supplies;
- Customer engagement which includes marketing, services supporting our products, our digital channels and call centres; and
- Employment costs which includes recruitment and training.

Commitment to Modern Slavery

At Columbus we recognise the responsibility that we have as a commercial organisation to prevent and combat modern slavery in our business and the supply chains we participate in. We aim to achieve this by operating in a manner that is ethical, transparent and fair and we have designed our policies and procedures to drive this behaviour in our business.

We demonstrate our commitment through our formal policies that we have in place that are intended to promote ethical and legally compliant business conduct. Our policies contribute to our commitment to prevent violations of human rights such as modern forms of slavery in our business and demonstrate our commitment through our:

- Employee Code of Conduct,
- Whistleblowing Policy; and
- Anti-Money Laundering Policy and Procedure.

Potential risks in our operations and supply chains

We undertook a review of potential risk of modern slavery practices across our operations and supply chains.

For this Statement, we have focused more on the potential risks to people rather than risks to our business entities.

As a result, the Columbus Group has been able to identify areas with no or low risk, for example, in any operational activities that are directly undertaken by Columbus Group employees and covered by our internal policies, procedures and processes.

Continuing to address the risk of modern slavery practices

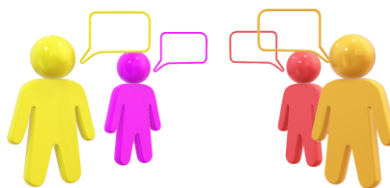
Over the next financial year we will continue to review our business operations and supply chains and we will focus on the following areas to ensure that we have robust processes in place to minimise the risk of modern slavery in our operations and supply chains:

Governance



- we will be incorporating our approach to address the various risks of modern slavery practices in our compliance framework and assurance processes
- we will be reviewing and updating our suite of risk-related policies and governance control measures

Staff Awareness



- We will be delivering appropriate Modern Slavery training to our staff to increase awareness

Suppliers



- We are prioritising our supplier engagement activities
- reviewing our Supplier Engagement Principles and our supplier on-boarding requirements

These measures will ensure that our organisation has robust and effective processes that are firmly embedded in how we do business.

This 2020 Modern Slavery Statement was approved by the Board of Directors of Columbus Capital Pty Ltd ACN 119 531 252 on 31 March 2021.

Ilias Pavlopoulos

Ilias Pavlopoulos
Chief Operating Officer
23 June 2021