

Modern Slavery Statement



This joint modern slavery statement (**Statement**) has been prepared in line with the requirements of the *Australian Modern Slavery Act 2018 (Cth)* (**Act**). This Statement covers the reporting entities Property Exchange Australia Limited and PEXA Group Limited, as well as PEXA Group Limited's operating subsidiaries and controlled entities for the financial year ended 30 June 2023 (**PEXA Group**). This Statement does not cover non-controlled entities or non-operated joint venture operations.

This Statement sets out the actions taken by PEXA Group to identify, assess, and address modern slavery risks across its operations and supply chains for the reporting period ended 30 June 2023.



The PEXA Group proudly acknowledges Australia's Aboriginal and Torres Strait Islander communities and their rich cultures and pays respect to elders past and present.

We recognise and value the ongoing contribution of Aboriginal and Torres Strait Islander people, and communities, to Australian life and how this enriches us. We embrace the spirit of reconciliation, working towards the equality of outcomes and ensuring an equal voice. We accept the invitation to walk with First Nations Peoples to a better future for us all.

Managing Director & Chief Executive Officer statement

Our Commitment to Ethical and Responsible Business

Our purpose is connecting people to place. Together with our global network, we are on a journey to revolutionise the way people buy and sell property.

Our focus on ethical governance practices is fundamental to PEXA Group's ability to deliver lasting value for our people, communities and planet. PEXA Group's responsibility to champion and support internationally proclaimed human rights is critical to how we operate and approach sustainability. This position extends to how PEXA Group approaches and mitigates the risks of modern slavery throughout its business and supply chain.

During the year we developed our program further and continued to identify and address potential risks of modern slavery. We have expanded our Responsible Sourcing Policy, uplifted our governance and engagement with suppliers and ensured that our Modern Slavery training module was compulsory for all employees.

This FY23 Modern Slavery Statement outlines our progress made during the year and how we will continually improve and evolve our program.

Yours sincerely



Glenn King
Group Managing Director & Chief Executive Officer

Purpose: Connecting People to Place

About PEXA Group

Reporting Entity, Structure, and Operations

PEXA is a world-leading, ASX-listed digital property exchange platform and property insights solutions business. PEXA Group’s companies consist of PEXA Group Limited (a public company listed on the Australian Securities Exchange) and a number of wholly owned subsidiaries in Australia and the UK. This includes Property Exchange Australia Limited (PEXA), the entity that operates the platform known as ‘PEXA’. As the main operating entity within the PEXA Group, PEXA is the entity that enters into the majority of supplier contracts and has responsibility for managing the global supplier base.

In addition to the Australian property exchange business, PEXA Group, through its controlled subsidiaries, operates data insights and a ventures business (focused on delivering new digital property products) in Australia. PEXA Group has also established operations in the UK seeking to expand PEXA’s digital property exchange business in that market.



PEXA Exchange

World-leading digital property lodgement and settlement platform



PEXA Digital Growth

Property insight solutions enriching PEXA’s customer proposition



PEXA International

Leveraging PEXA’s unique IP into major Torrens Title markets

BRANDS



A World-First Initiative

PEXA is one of the only platforms in the world that enables lodgement of documents with land registries and payment of settlement funds at the same time. Robust, secure, and fast, our superior property settlement experience is trusted by more than 10,000 legal and conveyancing firms and 160 financial institutions. To date, the platform has facilitated 16 million of property settlements, worth more than \$3 trillion in property value.

Built by the Industry, for the Industry

Created in partnership with enterprising individuals from government, banking, legal, and conveyancing communities, PEXA meets the needs of everyone, from lenders to homeowners. As those needs are always changing, PEXA collaborates with members wherever possible. As a result of our laser focus on members, PEXA is proud of its industry leading brand trust score and strong customer effort score (+81).

Our People and Environmental, Social, and Governance (ESG)

In late 2022, PEXA launched our Employee Value Proposition and PEXA Academy to invest in future leadership. We are committed to setting our people up for success and achieving compliance, including providing clear expectations around behaviours and responsibilities.

Employees are based across Australia and premises in Leeds, UK. Given the nature of PEXA Group's business, team members are mostly desk-based. PEXA Group has a strong, inclusive culture reflected in its employee engagement scores and recognised by industry.

PEXA Group has several internal policies to ensure our values are upheld, including our Code of Conduct and Ethics and Diversity and Inclusion Policy. Over the past year, PEXA Group has achieved a 52:48 gender diversity split.

In line with our Risk Appetite Statement, PEXA provides a safe, inclusive, diverse, and supportive environment - which is fundamental to our success. All employees have a duty to act responsibly and in accordance with the Statement, and relevant Work, Health, and Safety standards detailed in the Work Health & Safety Policy.

During the year, an inaugural ESG materiality assessment was conducted to ensure we focus on our most material ESG issues to our business and our stakeholders. PEXA has undertaken significant work over the past two years to establish our Environmental, Social and Governance (ESG) framework to leverage our insights and advance material issues of social significance, such as housing affordability, sustainability, wellbeing, and diversity. In FY24, PEXA will refresh our ESG framework to support the management of our key ESG risks and opportunities in adherence to a changing regulatory corporate governance environment.

Governance, Risk Management, and Policies

PEXA Group is committed to providing a workplace that is inclusive, protects human rights, and ensures appropriate governance across all operations. Policies have been designed to provide a workplace culture of cohesion, diversity, collaboration, health and safety, and free from discrimination. PEXA continues to review and expand our approach to managing modern slavery risk. PEXA Group corporate governance and policies that support our Modern Slavery Statement include:

- [Corporate Governance Statement](#)
- [Whistleblower Policy](#)
- [Code of Conduct and Ethics](#)
- [Anti-Bribery and Corruption Policy](#)
- [Diversity and Inclusion Policy](#)
- [Responsible Sourcing Policy](#)

PEXA Group’s policies are reviewed annually (including modern slavery controls), approved by the relevant Board and or Board Committee, and are publicly available on the company website. PEXA Group’s Modern Slavery Statement and policies are also available on the company intranet for all employees to access.

PEXA Group’s risk management framework is designed to identify material financial and non-financial risks that may impact our ability to achieve our strategic objectives. Core to this framework is the Board’s establishment of risk appetite for PEXA Group.

Table 1 demonstrates the three lines of defence model for compliance with the Group’s risk appetite and its risk management framework.



Business leaders are responsible for identifying and managing risks within their respective areas. PEXA Group’s risk management function establishes our risk management framework and

challenges the effectiveness of management's compliance with it. Internal auditors undertake various independent assessments to ensure effective risk compliance.

The office of the Chief Financial and Growth Officer has the responsibility to prepare this statement (in partnership with business units), and for managing modern slavery risks, with guidance and oversight from the Executive Leadership Team and Board Audit and Risk Committee. The Board Audit and Risk Committee has responsibility for the management of modern slavery risks and associated program activities.

Each year, the Modern Slavery Statement is presented to the Board Audit and Risk Committee as an agenda item for discussion, input and approval. The Board Audit and Risk Committee Charter is available on the company website: [Audit and Risk Committee Charter](#).

PEXA Supply Chain and Modern Slavery Risks



Supply Chain Governance

PEXA Group is committed to identifying and addressing risks of modern slavery in its operations and supply chains. We will routinely review the effectiveness of our policies and practices, utilising our whistle-blower line (where appropriate), to help identify issues, and conducting an internal audit programme.

PEXA Group maintains its Responsible Sourcing Policy sets out the minimum standards we expect from our suppliers and partners. The Policy is applicable for all suppliers and contractors of the PEXA Group as well as any other third party, including those who perform services for, or on behalf of the PEXA Group. The PEXA Group includes PEXA Group Limited and subsidiaries, including Digital Completion UK Ltd.

The purpose and intent of this policy is for suppliers of goods and services to PEXA Group to align with PEXA Group values, adhere to PEXA Group's high standards, environmental sustainability practices, and comply with labour standards and business integrity.



Modern Slavery Risk Areas

PEXA Group's business activities do not substantively intersect with categories that represent a high risk for modern slavery. PEXA Group's products are technology-based with our employees predominantly based in Australia and the UK. However, we have identified that the use of services managed by third-party providers such as labour hire, outsourced activities, and sub-contracting, may represent a potential risk if third parties are not compliant with labour legislation and standards.



Supplier Locations

PEXA Group has an active supplier base of approximately 670¹ suppliers, which provide direct and indirect services and products to PEXA’s Australian and UK operations. This supplier base is predominately made up of suppliers or subsidiaries in Australia:



Supplier Spend Categories

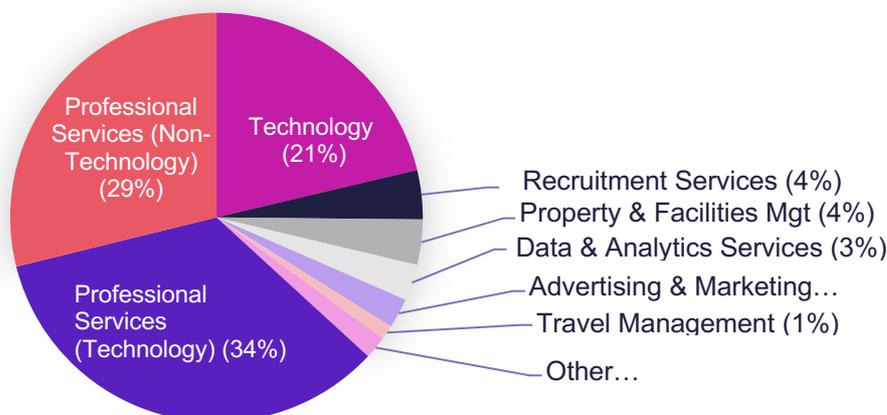
PEXA Group suppliers are concentrated within two substantial categories of spend, totalling \$107.86M for FY23:

1. \$68.09M for professional services (including advisory, consulting, technology development and non-technology managed services); and
2. \$22.95M for technology (including infrastructure services, managed technology services, software applications, and hardware).

Other notable supply categories for PEXA Group include, data & analytics services, recruitment services, property & facilities management, and advertising & marketing.

¹ Active suppliers are based on spend data above \$3000 (AUD) accrued during FY23, excluding payment of government duties and payments, based on PEXA’s position as at 30 June 2023.

FY23 Supplier Categories



How PEXA Group Assesses and Addresses Modern Slavery Risks

During the reporting period, PEXA Group undertook the following actions to assess and address modern slavery risks:



Responsible Sourcing Policy

The Responsible Sourcing Policy was updated and endorsed in October 2022 to reflect PEXA Group’s expansion into multiple jurisdictions (namely Australia and the UK), and to include:

- PEXA Group’s commitment to assist victims in case of breaches.
- PEXA Group reserves the right to terminate supplier agreements in case of serious breaches.
- Encouragement and guidance for suppliers to go beyond compliance with the applicable laws via continuous improvement activities.
- Reporting forums to assist suppliers and PEXA Group to address concerns, such as governance meetings, engagement through the business relationship manager, escalation through the GM Sourcing & Partnerships, and the third-party whistleblower service.



Training

- Employee training material has been developed and refreshed to reflect Australian and UK jurisdiction specific modern slavery requirements and details.
- Refreshed employee training has been conducted via PEXA Group’s Learning Management System to strengthen awareness on modern slavery risks, and the refreshed responsible sourcing policy. Additionally, training has been expanded to include various PEXA Group subsidiaries acquired through the course of FY23.

- Mandatory training rolled out to all 793 Australian based PEXA Group employees and contingent labour in April 2023, with a total of 714 completed by end of June 2023.
- Training was rolled out to 43 UK based employees in April 2023, with a total of 40 completed by end of June 2023.



Contract Templates

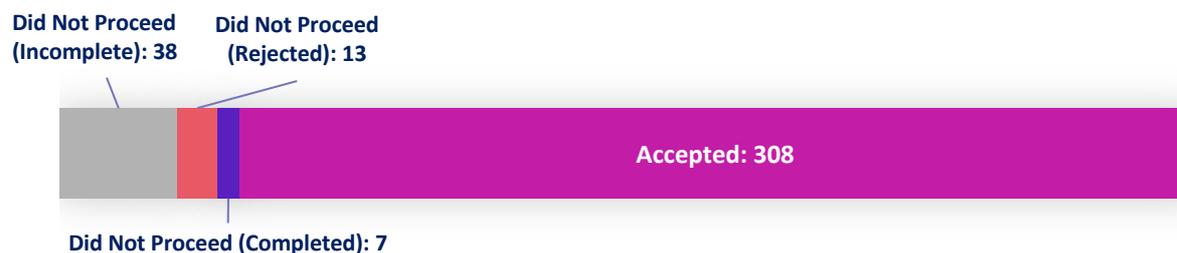
- Supply contract templates updated to include refreshed clauses addressing modern slavery risks. This includes the addition of additional contract templates aimed at the most prevalent spend categories:
 - Consulting Services (Technology and non-Technology).
 - Technology Development Services.
 - Technology Implementation and Integration Services.
 - Technology Support & Maintenance Services.
 - Technology Managed Services.



Supplier Risk Assessments

- Ongoing assessments of the PEXA Group supplier base to determine where inherent risks could exist within PEXA Group’s supply chain. Significant focus has been given to assessing the supplier risks associated with incoming suppliers to PEXA Group as a result of new PEXA Group entities from mergers & acquisition activity.
- Inclusion of a modern slavery and responsible sourcing compliance statement within PEXA Group’s third-party desktop risk assessment, forming part of the supplier’s commitment to PEXA during the onboarding process:
 - 366 supplier assessments were conducted.
 - 308 suppliers were accepted for onboarding.
 - 58 assessments were rejected or did not proceed.
 - 0 assessments were rejected due to modern slavery concerns.

FY23 Modern Slavery Supplier Assessments



Path of Continual Improvement

PEXA Group is committed to continually improving its approach to identifying, addressing, and mitigating modern slavery risks. We will continue to work in collaboration with our suppliers to identify and address modern slavery risks in PEXA Group's supply chains.

For the reporting period ending 30 June 2024, the actions that the PEXA Group will take to improve its approach will include, but are not limited to, the following activities:

- PEXA Group has joined the Global Compact Network of Australia in support of the guiding principles.
- Suppliers identified as "Medium" risk will be engaged by PEXA Group to determine level of compliance².
- PEXA Group will engage with its suppliers that constitutes an estimated 80% of company spend, to understand their modern slavery commitments and program maturity. We will continue the dialogue with our suppliers to understand third-party risk with intention to evolve this engagement to include other tiers of suppliers over time.
- PEXA Group will continually explore and value our relationships with relevant bodies in the modern slavery space to ensure we are aligned with leading organisations that can support our continual improvement. We will develop our engagement as a new participant of the Global Compact Network Australia as a new member of the Modern Slavery Community of Practice.
- PEXA will continue to develop its Responsible Sourcing Policy to ensure it continues to develop ethical business relationships and systems and controls to identify and address modern slavery risks in PEXA Group's supply chains.

To assess the effectiveness of its actions, PEXA Group will continue to undertake the following activities:

1. Ensure it remains a mandatory requirement for all team members to have read and understood the terms of the Responsible Sourcing Policy. Employees must acknowledge that they have read and understood the Policy as part of their compliance training.
2. Assess the number of suppliers that have completed the third-party risk assessment and agreed to comply with PEXA Group's Responsible Sourcing Policy and Modern Slavery requirements.
3. Continually monitor PEXA Group's supplier ecosystem, policy, practices and tools for opportunities to improve modern slavery risk identification and mitigation. This includes taking a deeper dive to understand those suppliers using monitoring tools that can potentially flag instances of modern slavery in the supply chain and other risks.

² Due to a refocus on new suppliers to PEXA's supplier ecosystem resulting from acquisitions during FY23, Medium risk supplier assessment activities have been carried forward to FY24.

PEXA Consultation and Approval of Statement

This Statement has been approved by PEXA Group's Executive Leadership Team and the Board Audit and Risk Committee. It was prepared in consultation with PEXA Group's management, including representatives from the corporate affairs, legal, risk, ESG and sourcing & partnerships departments. PEXA's Chief Financial & Growth Officer is responsible for preparing this Statement and approved this Statement prior to submission to the board of PEXA Group Limited.

This Statement was approved by the board of directors of PEXA Group Limited on 30 November 2023.



Glenn King

PEXA Group Managing Director and CEO