



# Joint Modern Slavery Statement

For the period 1 July 2021 to 30 June 2022

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## Introduction

Modern slavery remains prevalent across the globe and we know that it has a devastating impact on communities and individuals round the world. As a result, Finder has a zero-tolerance approach to forced labour in all the forms it may take and we are taking active steps to reduce the risk of it occurring in our operations and our supply chains.

This statement outlines our approach to addressing modern slavery and acts as a joint Modern Slavery Statement (Statement) for the financial year ended 30 June 2022 covering Finder.com Pty Ltd (Finder) and its wholly owned subsidiaries which include Hive Empire Pty Ltd (finder.com.au) and finder.com Comparison UK Ltd (together with the Finder Group). It is prepared for the purposes of, and in accordance with, the Modern Slavery Act 2018 (Cth) in Australia and the Modern Slavery Act 2015 in the United Kingdom.

The statement is structured as follows:

- About Finder and our operations
- Our modern slavery risks
- The actions we are taking to address these risks

### **Our commitment to protecting human rights**

Finder is aware of the damage that is done by modern slavery all around the world and we are fully committed to protecting human rights within our operations and our supply chains. 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 work has been compiled and managed by our Modern Slavery Working Group that is made of representatives from our Corporate Social Responsibility, Public Affairs, People & Culture, Legal and Finance functions.

## About Finder and our operations

Finder is a multinational financial technology business that builds and operates comparison websites and personal finance apps in countries around the globe. Finder's purpose is to "help people make decisions that change their lives for the better" and we do this by:

- Offering comprehensive comparison services including guides, tools and calculators;
- Building personal finance management apps that sit at the heart of consumers' finances; and
- Offering a platform for providers in the spaces we compare to communicate to customers about their propositions.

Finder operates websites in 35 countries including Australia, New Zealand, the United States of America, the United Kingdom and Singapore, among others. Our primary operating entity in Australia is Hive Empire Pty Ltd (trading as finder.com.au) and our primary operating entity in the United Kingdom is finder.com Comparison UK Ltd. We currently have offices located in 6 cities around the world in Sydney, New York, Denver, London, Singapore and Wroclaw.

### Our crew

We call our employees our crew here at Finder. Over 400 people work for our company around the world in a variety of skilled roles including digital publishing, copywriting, software engineering, product management, marketing, public relations, customer service, finance, cybersecurity and legal services. Our crew are located all around the world but the majority are based in Australia, the United States of America, the United Kingdom, Singapore or Poland.

### Our supply chain

Finder is a digital business that has a relatively simple supply chain. Our major third-party suppliers which account for over 9% of our annual procurement spend include:

- Suppliers of advertising services (particularly digital advertising services)
- Suppliers of outsourced, freelance or contracted labour
- Suppliers of technology services (particularly cloud computing and cybersecurity services)
- Suppliers of data and analytics services
- Suppliers of professional services (particularly accounting and legal services)
- Suppliers of office-related services (particularly catering and cleaning services)

## Overview of modern slavery risks

Our Modern Slavery Working Group has carried out a geographical and sector-based risk assessment of the potential for modern slavery practices to be present in the direct operations and supply chain of the Finder business. Overall, we consider the Finder business to have a low risk of contributing to modern slavery.

### Risks in our operations

Finder is a digital business that builds online and app-based financial services for consumers in the developed world. As a result our employees tend to be highly skilled and working in countries with strong labour laws such as Australia, the United Kingdom and the United States of America. This means that the inherent risk of modern slavery practices within our direct operations is relatively low for the majority of the business. We have identified some of our crew that are residents of countries like the Philippines, Pakistan, Thailand and Macedonia where there is a higher risk of modern slavery.

### Risks in our supply chain

We have done both a geographic and sector-based risk assessment of our primary suppliers. Analysis of our suppliers spanning for the financial year ending in June 2022 show our suppliers are primarily located in Australia, the United States and the United Kingdom. Based on data from the Global Slavery Index<sup>1</sup> we know that these markets are relatively low-risk markets for modern slavery practices. Our analysis did also identify a number of smaller suppliers in higher-risk markets including the Philippines, India and Belarus. It is important to note that these countries do pose a higher risk of modern slavery practices and we will be taking steps to better continue to monitor the practices of our suppliers.

Our sector-based risk assessment was backed up by resources from the Walk Free Foundation<sup>2</sup> and the Australian Border Force<sup>3</sup>. The analysis showed that our primary suppliers in terms of spend are in low-risk sectors such as advertising and technology services. We did identify higher-risk suppliers providing contracted labour to Finder from higher-risk countries. We also identified suppliers from higher-risk industries such as cleaning services, catering services and clothing production. These suppliers represent a small proportion of our overall spend but do present a higher risk of modern slavery.

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<sup>1</sup> [Global Slavery Index](#), Walk Free Foundation

<sup>2</sup> [Business Toolkit Primer](#), Walk Free Foundation

<sup>3</sup> [Modern Slavery Facts & Figures](#), Australian Border Force

# Actions taken to address modern slavery risks

## Overview of the actions taken in this financial year

### **Formalised Modern Slavery Working Group**

A working group has been formed to act as champions in the business about the importance of identifying and combating modern slavery risks. This is a cross-functional, international group made up of representatives from our Corporate Social Responsibility, Public Affairs, People & Culture, Legal and Finance functions.

### **Drafted our first formal Supplier Code of Conduct**

This year Finder has drafted its first Supplier Code of Conduct that we will roll out across our suppliers in the coming year. This Code of Conduct aligns with our broader approach to modern slavery with specific references to the issues raised in this statement. Once implemented, it will be a requirement for all suppliers to adhere before Finder engages them for work.

### **Undertaken first modern slavery supplier risk assessments**

Our Modern Slavery Working Group completed a geographical and sector-based risk assessment of our suppliers from FY20 to FY22 to better understand the modern slavery risks in our supply chain. This analysis identified the countries where our suppliers are based and the industries that are represented. The modern slavery risk of these countries and sectors was then assessed using external data and research such as the Global Slavery Index.

### **Continued focus on contractor onboarding controls**

Finder works with external marketplace vendors who conduct identification and background checks as part of their onboarding procedures for our contracted and freelance employees. These processes ensure that independent professionals are who they say they are, and are verified with an identification document review and video call.

### **Continued focus on fair compensation for all Finder crew**

Finder reviews compensation for all crew against the market by geography, job family and job level on an annual basis 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.

## Overview of planned future actions

### **Introduce additional due diligence for high-risk suppliers**

We commit to undertaking further investigation of suppliers who we deem to be high risk. We understand that the onus is on Finder to take every reasonable precaution against modern slavery, not just taking the word of suppliers.

### **Conduct internal training on modern slavery issues**

The working group commits to ensuring that all Finder employees, particularly those in roles such as procurement with a high risk of coming into contact with organisations engaging in modern slavery, are given the proper training and processes to identify and exclude suppliers that are engaging in modern slavery. As part of our awareness and training we will seek to ensure that employees are aware of any key updates to our policies and procedures that prohibit modern slavery.

### **Introduce modern slavery-related clauses**

We will include modern slavery-related clauses in contracts with high-risk suppliers. The modern slavery clauses will impose minimum expectations on suppliers to conduct their businesses in a way that effectively mitigates modern slavery risks in their supply chain. If we become aware that a supplier has breached a modern slavery-related term, we may enforce our contractual rights to compel compliance or exercise our power to terminate the contractual arrangement where relevant.

### **Introduce contractor governance models**

We will commit to introduce governance for reviewing freelancer and contractor agreements on a regular basis. Conducting periodic reviews against contractor employment types to reflect appropriate classifications and local working rights.

## Assessing the effectiveness of these actions

As part of Finder's first Modern Slavery Statement, we commit to assessing the effectiveness of the actions in place on at least an annual basis with a view to continuously improve. 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 every employee 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 Risk and Compliance framework.

## 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.

## Approval

This Statement was approved by the Board of Finder.com Pty Ltd on behalf of each of the subsidiaries of the Finder Group named in this Statement on 28 February 2023.

**Signed by:**

A handwritten signature in black ink, appearing to read 'F. Restuccia', written over a horizontal line.

**Frank Restuccia**

Founder, CEO, Executive Director



**Questions?**

Contact the Finder communications team at [comms@finder.com](mailto:comms@finder.com)