Modern Slavery Statement



This joint modern slavery statement (Statement) has been prepared and submitted by PEXA Group Limited ACN 629 193 764 and on behalf of Property Exchange Australia Limited ACN 140 677 792, each a reporting entity under the *Modern Slavery Act 2018 (Cth)* (Act). In this Statement, these entities are collectively referred to as the 'PEXA Group'.

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 2022.



Our commitment to ethical and responsible business

PEXA Group's focus on ethical governance practices is fundamental to PEXA Group's ability to deliver lasting value for its 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.

Transforming property experiences for everyone

About PEXA Group

These days, when Australians buy or sell a house, chances are their transactions will happen online. That's because back in 2010 PEXA Group began a journey that would ultimately revolutionise the way Australians exchange property. Backed by a government initiative aimed at creating less paperwork, process times and margin for error, PEXA Group set about modernising the AU\$9 trillion residential property market.

The PEXA Group of companies consists 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 and has established operations in the UK seeking to expand PEXA's digital property exchange business to that market.

A world-first initiative

PEXA is one of the only platforms in the world that enables lodgement of documents with the land registry and payment of settlement funds at the same time. Robust, secure and fast, our superior property settlement experience is trusted by more than 9,700 legal and conveyancing firms and 160 financial institutions with more than \$2.4T in property value transacted via the platform to date.

Built by the industry, for the industry

Created in partnership with enterprising individuals from government, as well as the banking, legal and conveyancing communities, PEXA meets the needs of everyone, from lenders to homeowners. And because those needs are always changing, PEXA collaborates with members wherever possible. As a result of that laser focus on our members, PEXA is proud of its industry leading brand trust score and strong net promoter score (+70).



Here to help you home

Today, with more than 12 million transactions (and counting) completed, PEXA provides 20,000 families a week with speedy, safe and efficient access to real-time tracking of their property settlement.

PEXA Group's supplier base and risk profile of modern slavery practices

PEXA Group complies with the Act. In turn, PEXA Group requires all suppliers to adhere to and maintain operating standards in accordance with our <u>Responsible Sourcing Policy</u>.

PEXA Group has an active supplier base of approximately 600 suppliers, which provide direct and indirect services and products to PEXA's Australian and UK operations. This supplier base is predominately made up of Australian-based businesses and is concentrated within two substantial categories of spend:

- 1. professional and technology services (including advisory, consulting, development and managed services); and
- 2. technology covering infrastructure services, software applications, and hardware.

Other notable procurement categories for PEXA Group include recruitment services, facilities management, and advertising & marketing.

PEXA Group's business activities do not directly intersect with high risks sectors, 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.

Actions taken to assess and address modern slavery risks

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

- Supply contract templates updated to include clauses to address modern slavery risks;
- Ongoing supplier risk reviews will continue in partnership with SEDEX, to address any changes in modern slavery risks in the supply chain;
- Identification of a group of suppliers that are considered to be "medium risk" within the supply chain;
- Internal Responsible Sourcing policy training undertaken across the PEXA Group.



- Launched a program of work in partnership with SEDEX, a leading ethical monitoring trade service provider. SEDEX supported PEXA Group with supplier reviews, oversight of compliance activity, global notifications and insights.
- Undertook an assessment of the PEXA Group supplier base to determine where inherent risks could exist within PEXA Group's supply chain.
- Incorporated the Responsible Sourcing Policy in the onboarding of new suppliers.
- Inclusion of modern slavery questions within PEXA's third-party risk assessment which forms part of the supplier onboarding process.
- Completed site visits at two of our "high risk" consultancy suppliers based in India once Covid-19 travel bans were lifted.
- Modern slavery oversight from PEXA's Audit & Risk Committee (ARC) as outlined in the ARC charter.

PEXA Group has reviewed these high-risk suppliers in more detail and verified these suppliers are effectively managing their modern slavery risks.

Path of Continual Improvement

PEXA Group is committed to continually improving its approach to identifying, addressing and mitigating modern slavery risks. It is PEXA Group's responsibility to ensure that it is not complacent in mitigating modern slavery risks and continues to work in collaboration with its suppliers to achieve the objectives of the Act.

For the reporting period ending 30 June 2023, the actions that the PEXA Group will take to improve its approach will include, but are not limited to, the following activities:

- employee training will be conducted by SEDEX to strengthen awareness on modern slavery risks;
- suppliers identified as "Medium" risk will be engaged by PEXA to determine level of compliance; and
- Refresh of Responsible Sourcing Policy to reflect PEXA's expansion into other jurisdictions.

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

- 1. made it compulsory for all personnel to have read and understood the terms of the Responsible Sourcing Policy; a
- 2. assess the number of suppliers that have completed the third-party risk assessment and agreed to comply with PEXA's Responsible Sourcing Policy.

PEXA Group supports the goals and intention of the Act and is committed to identifying and addressing risks and any impact of modern slavery in its operations and supply chains. We will review effectiveness through continual review of our policies and practices, utilising our whistle-blower line where appropriate to help identify issues, and conducting an internal audit programme.

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 and procurement departments. PEXA's Chief Financial Officer is responsible for preparing this Statement and approved this Statement prior to submission to the board of Property Exchange Australia Limited.

This Statement was approved by the board of directors of PEXA Group Limited on 18th November 2022.

Glenn King PEXA Group Managing Director and CEO