

**HUMM GROUP LIMITED'S**

# **MODERN SLAVERY STATEMENT 2021**

**DECEMBER // 2021**

[shophummm.com/humm-group/](https://shophummm.com/humm-group/)

hummm group limited  
ABN 75 122 574 583

---

# STATEMENT FROM THE CHAIRMAN AND CEO.

**hummgroupp creates innovative payment products that make life easier and more affordable for our customers, helps businesses to grow and accelerates the development of innovative payment solutions.**

**This statement for hummgroupp was approved by the board of hummgroupp limited as the parent entity on 21 December 2021.**

This Joint Modern Slavery Statement has been prepared in accordance with the *Modern Slavery Act 2018* (the “Act”). The Statement describes the risks of modern slavery in the operations and supply chains of hummgroupp and includes information on the actions taken to address those risks for the financial year ending 30 June 2021. This Joint Modern Slavery Statement has been prepared by hummgroupp limited (ASX: HUM) (“hummgroupp”), an ASX-listed company, on behalf of hummgroupp and its associated subsidiaries, including hummgroupp cards pty ltd and FlexiRent Capital Pty Ltd, being the relevant reporting entities under the Act.

hummgroupp understands the important role that the Group can play in respecting and promoting human rights and eradicating modern


slavery. This statement covers all three reporting entities and the remainder of the companies in the Group.

Our **Code of Conduct** outlines our expectations of everyone we employ and those with whom we do business. We also have clear onboarding and vetting process in place for both employees and suppliers. In addition, our **Whistleblower Protection Policy** ensures that employees and anyone who works with us can speak freely about any concerns they have, including those related to our external partnerships, without fear of reprisal.

This statement for hummgroupp was approved by the board of hummgroupp limited as the parent entity of the Group, including hummgroupp cards pty ltd and FlexiRent Capital Pty Ltd, on 21 December 2021.



**Christine Christian AO**  
hummgroupp Chairman  
21 December 2021



**Rebecca James**  
hummgroupp CEO  
21 December 2021

# OUR COMMITMENT.

**hummg**roup provides its ongoing support for the purpose and intent of the Act, and will continue to take the actions necessary to minimise the risk of modern slavery within our operations and supply chain.

# STRUCTURE, OPERATIONS AND SUPPLY CHAIN.

## ABOUT US

**hummg**roup is a diversified full-service payments company with leading offerings in Buy Now Pay Later (BNPL), revolving credit, and SME finance. **hummg**roup developed some of Australia and New Zealand's most exciting and accessible consumer finance products including **hum**m buy now pay later, **bundll**, **hum**m90 and **hum**mpro. **hummg**roup designs products around the core needs of financially savvy consumers spanning millennial spenders through to young families, and also provides financial solutions for small and medium enterprises ("SMEs"). **hummg**roup facilitates purchases for over 2.7 million customers and operates in Australia, New Zealand, Ireland and the United Kingdom, with Canada the newest location in the **hummg**roup family.

We employ more than 700 people across five countries and their wellbeing remains a primary concern. We also believe that courtesy should be extended to the employees of our suppliers.

## WHERE WE OPERATE

**hummg**roup operates in Australia, Canada, Ireland, New Zealand and the UK, with our head office in Sydney. During the year we had offices in Adelaide, Melbourne, Auckland, Dublin, Belfast and, most recently, Toronto. We have senior management in place within every location.

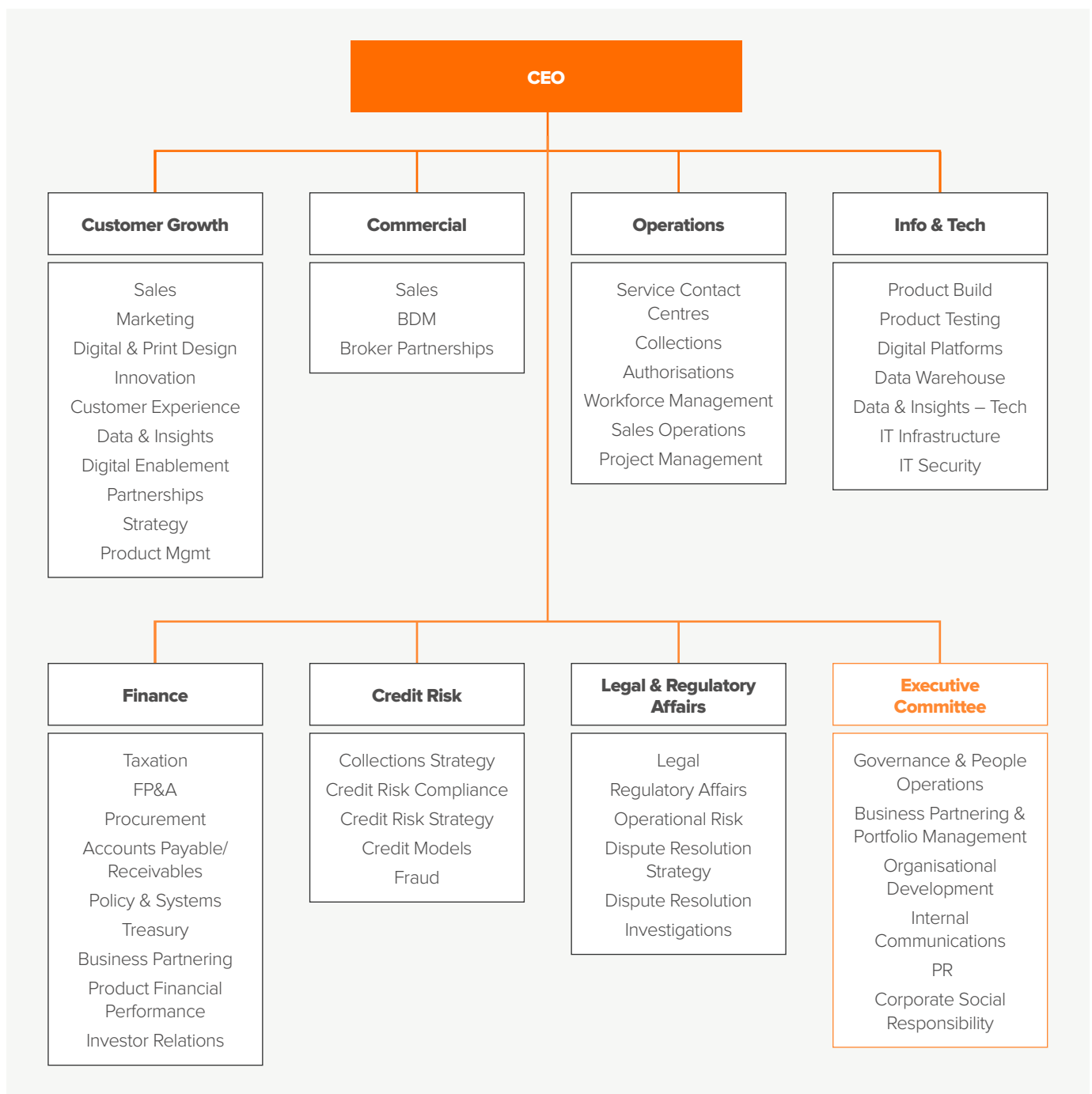
In addition, we contract call centre services from an Australian-based company with operations in Manila. This call centre team is carefully managed by a full-time **hummg**roup employee on-location, under the oversight of a member of the Executive team.

## HOW WE OPERATE

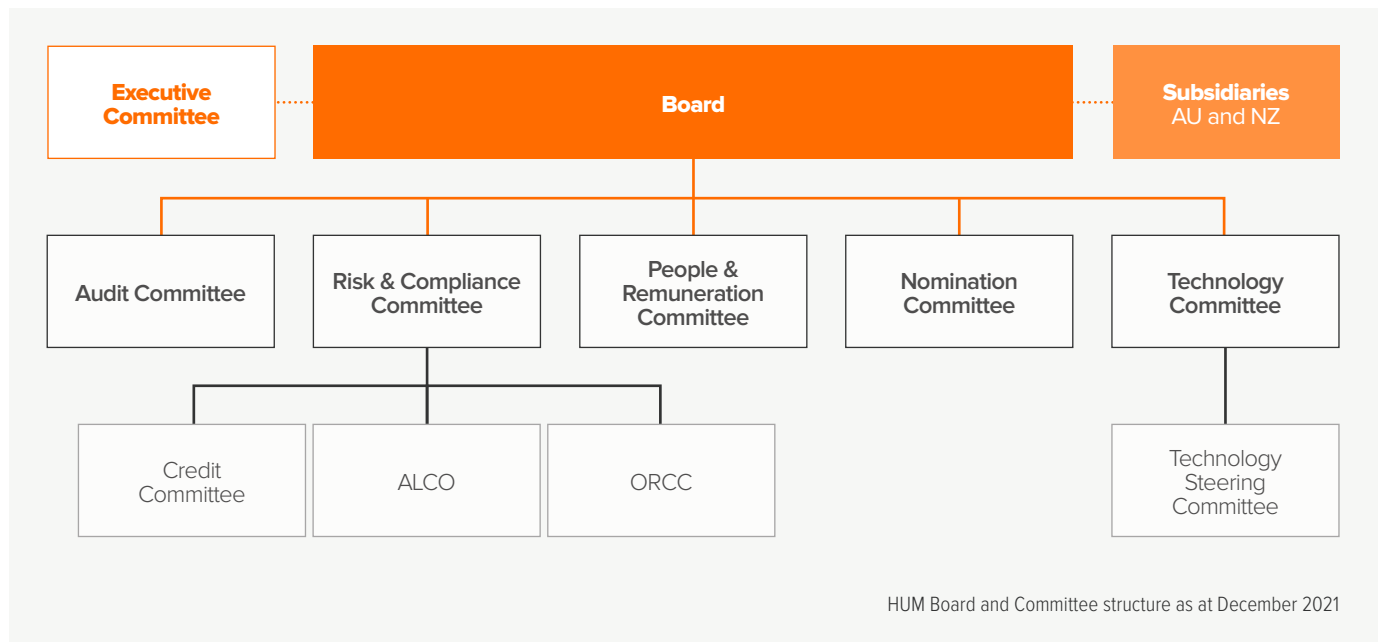
hummgroupproducts and services are predominantly designed, built, developed and delivered by employees of hummgroupproducts who work within our offices, supported by world class partners where specific expertise is required.

The risks of using an outsourced provider for call centre services have been carefully assessed and managed over the long history we have had with our provider, and hummgroupproducts believes that this thorough and careful management has eliminated the risk of modern slavery and ensured the wellbeing of all Manila-based contact centre staff is maintained. This has been a particular focus during the challenges experienced (and ongoing) as a result of the COVID-19 pandemic.

## OPERATIONAL STRUCTURE



## HUMMGROUP GOVERNANCE STRUCTURE



## OUR MODERN SLAVERY RISK AREAS.

Modern slavery includes 8 types of serious exploitation: trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and child labour. **hummg**roup has identified risk areas where there is a potential risk of modern slavery existing: third party contracting arrangements, high-risk geographies and goods and services, migrant workers.

- 01 Offshore vendors:** **hummg**roup has many offshore vendors, but none, as noted elsewhere in this statement, which are located in the 10 countries reported in the 2018 Global Slavery Index as taking the least action to respond to modern slavery.
- 02 Contingent workforce and managed services:** while **hummg**roup has contracts with a number of highly skilled specialists to provide professional and consultancy services, these are almost exclusively based in the jurisdictions in which we operate (and not any high-risk countries).
- 03 Overseas operations:** **hummg**roup does not currently operate in any high-risk locations, and has senior management in place within all operating locations.
- 04 Facilities management:** **hummg**roup procures various categories of services including cleaning, mechanical, electrical, information technology, hygiene specialists, caterers, and maintenance services. The workers within these supply chains can be from vulnerable populations, including migrant workers and workers from low socioeconomic backgrounds. This escalates the risk of modern slavery when it is not managed carefully. **hummg**roup chooses its suppliers in these areas after careful review of their practices.

---

# WHERE WE SOURCE.

As a fintech **hummg**roup has a third-party supply chain which is relatively simple in support of our provision of digital lending products and services.

We have not identified any specific instances of modern slavery within our operations or supply chain, and believe that the risks of modern slavery existing in our operations are low. **hummg**roup uses predominantly Australian and New Zealand based suppliers, which are governed by those countries' strong labour and modern slavery protections, and provide mainly professional services (including legal, financial, data analytics, data security and IT services) and employ qualified personnel, primarily under high standard labour laws.

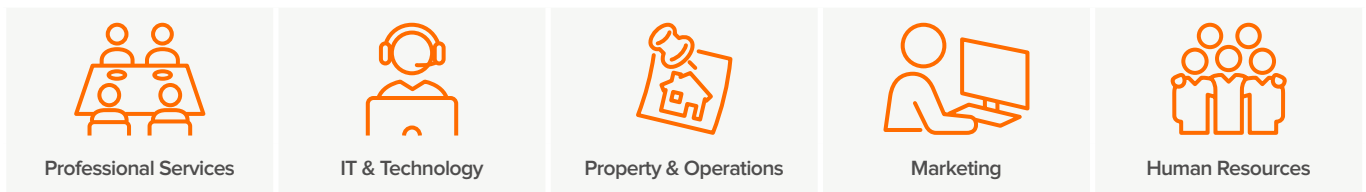
Additionally, our suppliers which are headquartered or based offshore provide products or services which are largely office-based or professional activities.

None of our suppliers are based in any of the 10 countries whose governments have been reported in the 2018 Global Slavery Index as taking the least action to respond to modern slavery.

Notwithstanding the foregoing, **hummg**roup will continue to monitor and assess the risk of modern slavery in the Group's existing and new operations. Our template contracts contain modern slavery related clauses, and we negotiate to include relevant provisions in any new arrangements undertaken on contractual documentation prepared by our counterparts.

It is expected that our suppliers will always act in a way that is consistent with our approach and will also adopt policies and/or processes which support the identification and eradication of modern slavery risks in their operations and supply chains.

## MAJOR CATEGORIES OF PROCUREMENT INCLUDE:



Where **hummg**roup identifies any non-compliance with its modern slavery stance it will endeavour to work with the supplier to take corrective action. Where corrective action cannot be achieved, **hummg**roup may suspend or terminate the relationship with that supplier.

# MEASURING EFFECTIVENESS.

Building on the steps completed in the previous year, **hummg**roup continues to review its risk assessment and management processes, and is developing a Group-wide modern slavery policy, and supporting training program.

**hummg**roup plans to continue expanding the range of suppliers who will be the subject of risk assessments, and will, where it has identified a need, work with our suppliers on implementing corrective actions.

**hummg**roup acknowledges that, as this is an ongoing journey which requires effort and focus across periods, we must continue to refine our approach and influence change with the suppliers with whom we operate.

# MODERN SLAVERY POLICY AND TRAINING.

hummgroupp is in the process of developing a group Modern Slavery Policy, to be submitted to the hummgroupp Board of Directors for approval. Once finalised it will be published on the hummgroupp website, and provided to our partners and suppliers.

The new policy will be supported by a training and education program, with a focus on our team members with procurement and engagement responsibilities. The intent of the modern slavery training will be for the participants to gain an understanding of the following:

- >> Overview of the *Modern Slavery Act 2018*.
- >> What modern slavery is or could be, how to identify where the different types of modern slavery could occur.
- >> hummgroupp's approach to modern slavery, and modern slavery risk management.
- >> Implementing and supporting the hummgroupp risk management process.
- >> Reporting of actual or potential occurrences of modern slavery.
- >> Modern slavery statement reporting.

We also updated our learning modules, HR policies and employment offer letters to underline this obligation for our people and ensure it remains front of mind for everyone.

# CONCLUSION.

**hummgroupp understands the importance of eliminating modern slavery and the role that the Group can play in eliminating this unacceptable practice from our operations and supply chains. While there is work which has been done over the course of our two reporting periods, hummgroupp recognises that this is a continuing journey requiring ongoing diligence and attention. hummgroupp will continue to enhance and embed the modern slavery risk management strategy to further reduce the Group's exposure to modern slavery risks, as well as working with suppliers to help eliminate modern slavery in their supply chains.**

**This statement was approved by the Board of Directors of the hummgroupp limited, on behalf the company and its relevant subsidiaries on 21 December 2021.**

---

hummgroupp limited  
ABN 75 122 574 583  
Level 1, 121 Harrington Street  
The Rocks NSW 2000  
Australia

[shophumm.com/humm-group/](https://shophumm.com/humm-group/)

