



## COG Financial Services Limited - Modern Slavery Statement

### Reporting Period: 1 July 2022 to 30 June 2023

COG Financial Services Limited ACN 100 854 788 of Level 1, 72 Archer Street, Chatswood NSW 2067 (**COG**) and its related bodies corporate (**the COG Group**) (which includes Platform Consolidated Group Pty Ltd ACN 609 245 981), has developed this Modern Slavery Statement (**Statement**) in line with the *Modern Slavery Act 2018* (Cth) (**the MSA Act**) in respect of the COG Group. This Statement outlines the actions taken by the COG Group to identify and address modern slavery risks in the COG Group's operations and supply chains during the reporting period 1 July 2022 to 30 June 2023 (**FY2023**).

#### **Commitment and values**

The COG Group is committed to responsibly assessing and addressing modern slavery risks in its operations and supply chains by taking all appropriate steps to ensure that the COG Group has no part – whether direct or indirect – in the provision of modern slavery and human trafficking throughout its operations and supply chains.

#### **About the COG Group**

The COG Group is an Australian Stock Exchange (ASX:COG) listed financial services organisation providing a range of financial products and services through the COG Group's broker and aggregation businesses and its finance leasing business. The COG Group's businesses operate exclusively in Australia, with some support services provided from various locations in South-East Asia.

Further details on the COG Group's activities and performance can be found on COG's website <https://www.cogfs.com.au/about/>.

#### **Structure, operations and supply chain**

The COG Group provides broker and finance services throughout its various businesses and operates exclusively in Australia. The majority of COG Group customers are individuals and small and medium sized enterprises.

The COG Group has offices in all States of Australia and the vast majority of COG Group staff are employed in Australia, however there are a handful of staff that are located in South-East Asia. Many of our staff hold relevant professional memberships and accreditations.

Apart from a handful of staff in South-East Asia, COG's operations and supply chain is limited to Australia, other than ad hoc purchases including things like office stationery, branded goods, catering, consumables, etc. which are sourced in Australia but may have been produced overseas. Where appropriate, due diligence on vendors is undertaken to ensure that the COG Group is not contributing to human rights violations, including modern slavery.



### **Assessment and mitigation of modern slavery risks**

Given the evolving nature of modern slavery, the COG Group continually reviews and considers the risks associated with modern slavery as an essential part of its business ethics, particularly where there is any likelihood of there being a risk of harm to people.

The COG Group continues to assess its business model and geographical footprint. Given the level of control the COG Group has over its operations, managed through frameworks and policies and the location of COG Group offices, the COG Group believes that its material exposure to modern slavery is limited to support services and supply chain.

As a financial services organisation with a professional workforce, the COG Group considers the risk of modern slavery within its direct business operations to be low. However, the COG Group recognises that through its support services, some of which are sourced in South-East Asia, it could be indirectly exposed to the risk of modern slavery and human trafficking.

Over the FY2023 reporting period, the COG Group has maintained and progressed its group-wide approach to modern slavery by maintaining and improving its previously implemented risk management processes to identify, assess, mitigate and monitor potential risk areas where it could be exposed to human rights concerns, including modern slavery and human trafficking.

The COG Group continues to engage AS White Global Pty Ltd, which is an Australian company of long-standing and strong reputation, to source support services and resources in South-East Asia. The COG Group also receives from AS White Global Pty Ltd an annual confirmation of that company's commitment to complying with the MSA Act.

The COG Group's approach to assessing and mitigating modern slavery risks includes reviewing and where necessary updating due diligence procedures and the requirement for suppliers to provide copies of their statements and policies relating to the MSA Act.

Modern slavery risks are more likely to exist where the principles of human rights are not respected and accordingly the COG Group's strategy to assess and mitigate modern slavery risks focuses on systems and processes to identify, prevent and remedy any actual or potential adverse human rights impacts under the areas of compliance, work culture, people, technology, governance, remediation and stakeholder engagement.

As a financial institution, the COG Group acknowledges that modern slavery and human trafficking is a potential risk in relation to financing activities. To address this risk the COG Group has credit risk policies and processes which incorporate a risk-based approach to assess any human rights risk (which incorporates modern slavery and human trafficking) as a part of its credit risk assessment and due diligence.



The COG Group acknowledges that it is vital to continually review its supply chain and operations to reduce the possibility of any of the COG Group's business activities contributing to, or facilitating, any form of modern slavery.

Additionally, the COG Group is committed to maintaining an open working environment in which employees, directors, contractors and suppliers are able to raise concerns regarding any actual or suspected unethical, unlawful or undesirable conduct freely and without fear of reprisal and/or intimidation. To support this commitment, the COG Group maintains a Code of Conduct, a Whistleblower Protection Policy, an Anti-bribery and Corruption Policy and other policies and statements which are available on COG's website, <https://www.cogfs.com.au/corporate-governance/>.

Onboarding and training for all COG Group employees covers obligations under COG Group policies on issues such as health, safety, wellbeing, harassment and bullying, discrimination and privacy.

COG has engaged the services of Access EAP to ensure that all employees have access to mental health and counselling services.

The COG Group's policies are made available to all employees and suppliers via the COG website and COG Group websites and our Group Whistleblower Protection Policy ensures any concerns can be raised safely, quickly and confidentially through various channels.

The COG Group continues to monitor the effectiveness of the processes and procedures that it has put in place to address the modern slavery risks that the COG Group may cause, contribute to, or be directly linked to, in line with the UN Guiding Principles. The COG Group continues to regularly assess the effectiveness of its actions in identifying and managing modern slavery risks by tracking its actions and outcomes, partnering with suppliers and other external partners and undertaking regular internal governance and external assurance processes. Based on the results of these processes, the COG Group will adapt and strengthen its actions to continually improve its response to human rights violations, including modern slavery.

### **Assessment**

The COG Group is pleased to confirm that during FY2023 it has not identified nor been made aware of any instances or allegations of modern slavery and/or human trafficking activities associated either directly or indirectly with its operations or that of its suppliers.

If the COG Group suspects modern slavery, it will ensure that appropriate action is taken including:

- Investigating the alleged conduct, either internally or externally via an independent third party; and
- Engaging with suppliers to express concern and working with them to address and remediate the situation.



If a supplier is unwilling or unable to remediate any such issue, the COG Group would take necessary action, including:

- Abstaining from entering a contractual arrangement or terminating the contract; and/or
- Reporting the suspected conduct to the relevant authorities.

COG has consulted with all companies within the COG Group in the development of this Statement and this Statement has been approved by the COG Board.

A handwritten signature in black ink that reads 'A. D. Bennett'.

Andrew Bennett

Group Chief Executive Officer

11 December 2023