

Modern Slavery Statement

Plenti Group Limited
2025



Acknowledgement of Country

Plenti respects and honours Aboriginal and Torres Strait Islander Elders past, present and future. We acknowledge the stories, traditions and living cultures of Aboriginal and Torres Strait Islander peoples on this land and commit to building a brighter future together.

We recognise the Gadigal people of the Eora Nation, who are the traditional custodians of the land on which Plenti's Sydney office stands, and the Kaurna people as the traditional owners of the Country where our Adelaide team is located.

A message from our CEO

This is Plenti's third Modern Slavery Statement (**Statement**), covering the reporting period between 1 April 2024 to 31 March 2025 (**Reporting Period**). It outlines the steps we have taken to identify and manage modern slavery risks in our operations and supply chain, and how we are addressing our obligations under the Modern Slavery Act 2018 (Cth) (**Act**).

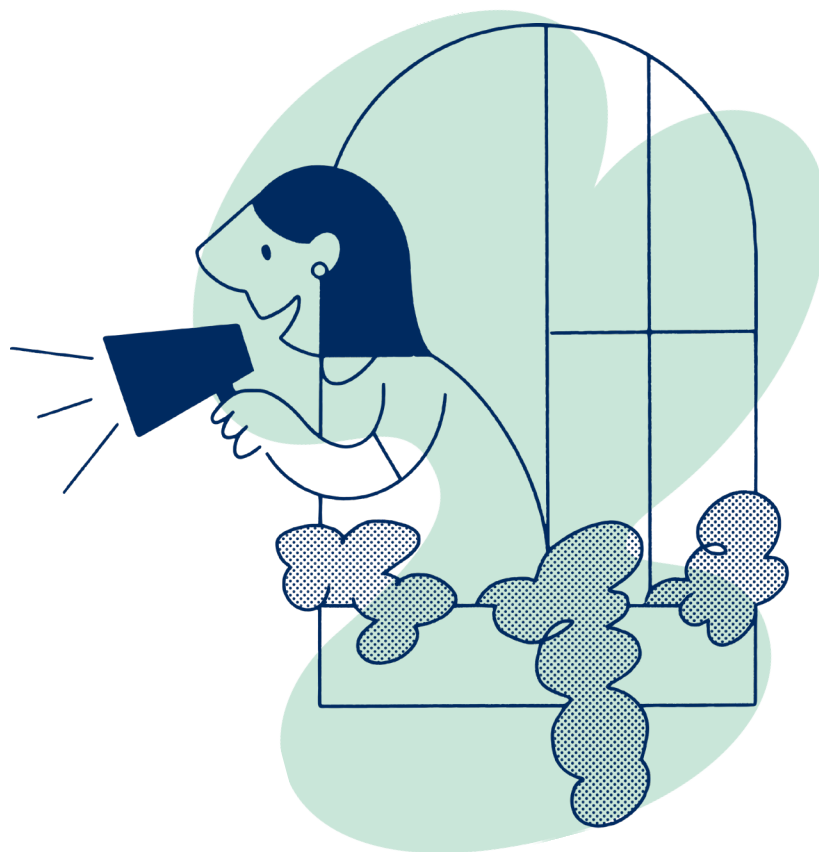
This is a joint Statement made pursuant to the Act covering Plenti Group Limited and its wholly owned subsidiaries set out in Section 7 of this Statement (for the purposes of this statement collectively referred to as "**Plenti**", "**we**" or "**our**"). Plenti takes a group approach to modern slavery as all Plenti entities operate in the same sector as a single consolidated group and are subject to the same policies and processes.

We recognise that modern slavery is a significant global issue which can occur anywhere, not just in developing countries and economies. We support the objectives of the Act and commit to minimise the risk of modern slavery within our operations and supply chain.

The Board of Plenti Group Limited (**Board**) has approved this statement on behalf of the reporting entities.



Adam Bennett
Chief Executive Officer



Our progress

Plenti has taken a series of actions to assess and address identified risks, including by undertaking due diligence and ensuring appropriate grievance mechanisms and remediation processes are in place. Plenti has assessed the effectiveness of these actions as follows:

Measure	Rating	Actions
Consultation and Governance		
Engage relevant stakeholders	3	Engaged with suppliers, employees and external board and committee members.
Ensure an appropriate compliance framework is in place	3	Plenti has a comprehensive modern slavery compliance framework, including modern slavery and other supporting policies, modern slavery training, quality assurance and compliance processes.
Implement and review staff training	4	Reviewed and updated employee modern slavery training, with 100% of employees trained.
Risk management and sourcing		
Identify and map supply-chain risks	4	Plenti further developed its supply-chain mapping by reference to the NSW Anti-slavery Commissioner's Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply-Chains and Inherent Risk Identification Tool.
Develop risk assessment process	4	Plenti improved its risk assessment processes by reference to the NSW Anti-slavery Commissioner's Inherent Risk Identification Tool and assessed over 70 suppliers through the improved process.
Conduct risk assessment on suppliers	4	Plenti has completed a risk assessment on suppliers which represent 92% of Plenti's spend on suppliers during the Reporting Period, including 100% of Plenti's key service providers.
Ensure modern slavery risk is dealt with in supplier contracts	3	Plenti has maintained its modern slavery clauses in all template agreements and continued to request relevant clauses be included in all non-template supplier agreements.
Select appropriate suppliers	4	Plenti refused to engage a supplier it identified as high-risk and identified suitable alternative suppliers.
Conduct customer due diligence	4	Plenti has incorporated new content responsive to modern slavery risk in its AML/CTF policies and procedures, which identify, mitigate and manage the risk of money laundering and terrorism financing.
Remediation and reporting		
Provide access to effective grievance mechanisms	4	Plenti has a number of grievance mechanisms, including internal incident forms and publicly available contact details for complaints and whistleblowers (eligible recipients).
Resolve grievances	3	Plenti has not received any grievances relating to modern slavery.
Data collection and reporting	4	As a result of the improvements Plenti made to its supply-chain and supplier risk assessments, it has broadened the data it collects about suppliers which has enabled it to better report on its modern slavery risks.

4 - Exceeds expectations; 3 - Meets expectations; 2 - Developing; 1 - Needs improvement

About us

Our approach to modern slavery

We acknowledge that modern slavery takes many forms and generally refers to any practice where, as the result of force, coercion, threat, deception or abuse of power, a person takes control over another. This may include servitude, forced labour, deceptive recruiting for labour or services, forced marriage, debt bondage, human trafficking and child labour.

We have a 'zero tolerance' approach to modern slavery in our operations but acknowledge that it may exist in our supply chain. As such, we are responsible for taking proactive and meaningful steps to address its root causes and work towards preventing it in the future.

Our approach to modern slavery is driven by our Risk Management Framework and supported by our values.

Risk Management Framework

Our Risk Management Framework sets out how we have embedded risk management in our operations and decision making and enables us to proactively identify, respond to, and manage risk. Additionally, the Risk Management Framework including our Risk Management Policy clearly articulates the roles, responsibilities and accountabilities of individuals and committees involved in the risk management process.

Additional information about our Risk Management Framework is set out in our Corporate Governance Statement and Audit and Risk Committee Charter, which are available on our website.

Our values

The establishment of Plenti in part reflected an ambition to enable borrowers and investors to participate in a more fair and equitable financial system. Intrinsically linked to this ambition is our commitment to providing value to our borrowers and investors, and contributing positively to the environment and community in which we operate.

Plenti's Values are a pillar of our culture and the framework which empowers Plenti's employees to identify, analyse, plan and act upon risk:

- **Be the best:** We're a high-performance team with ideas that make a difference.
- **Do what's right:** Our decisions matter.
- **Make it happen:** We keep it simple, do it together, and get the job done.
- **Think like a customer:** We never forget that our customers are what it's all about.



Plenti's structure, operations and supply chains

Operations

Plenti is a technology-led consumer lending and investment business listed on the Australian Securities Exchange. As at 31 March 2025, we had funded over \$6bn in cumulative loans to over 250,000 borrowers with over 26,000 registered investors on our platform. Our core business activities include:

Consumer lending: Plenti provides consumer lending products to finance the purchase of a range of goods and services. The consumer lending products provided by Plenti include automotive, green and personal loans.

Commercial lending: Launched in 2021, Plenti provides finance to commercial customers, including companies and sole traders, for the purchase of vehicles for commercial use.

Plenti Lending Platform: The Plenti Lending Platform provides a unique platform for retail investors to make a fixed-income investment in loans financed by Plenti.

Plenti Wholesale Lending Platform: The Plenti Wholesale Lending Platform provides a platform for wholesale investors to invest their funds in loans financed by Plenti.

Structure

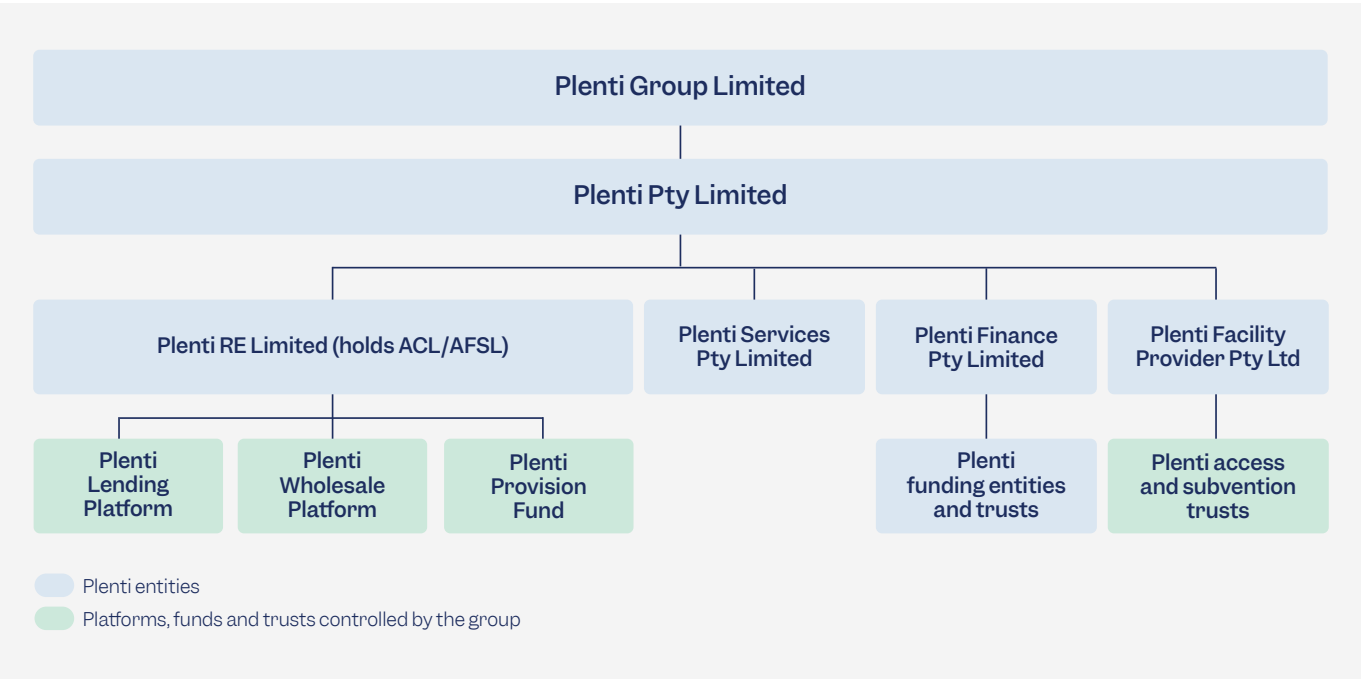
Plenti Group Limited operates its core business activities through its wholly-owned subsidiary companies, which include:

Plenti Pty Limited: the main operating subsidiary in Plenti's corporate group.

Plenti RE Limited: holds an Australian Financial Services Licence and an Australian Credit Licence, which enables Plenti to undertake a majority of its core business activities. Plenti RE Limited is also the Responsible Entity of the Plenti Lending Platform and trustee of the Plenti Wholesale Lending Platform.

Plenti Finance Pty Limited: the main funding subsidiary of Plenti and the credit provider under loans funded by Plenti as part of our securitisation program.

A simplified version of Plenti's corporate structure is provided below:

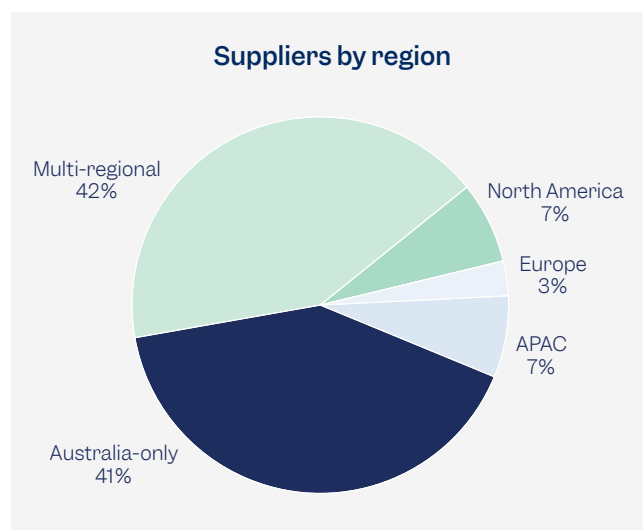
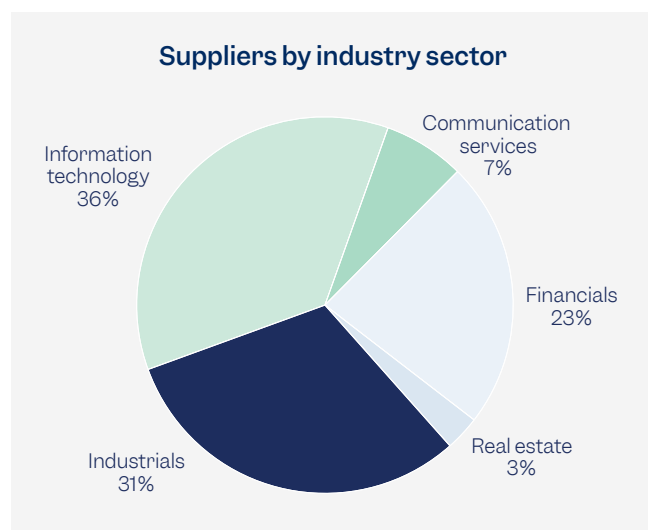


As at 31 March 2025, Plenti employed over 200 staff, with a majority based in either our head office in Sydney or our second office in Adelaide. A small number of our employees were also based in each of Queensland, Victoria, Western Australia and overseas.

During the Reporting Period, Plenti contracted approximately 15 personnel in Vietnam through an external labour hire arrangement to provide IT engineering services. We maintain close relationships with our external labour hire provider to ensure we retain a high level of oversight over their operations, including the wellbeing and treatment of our contracted personnel.

Suppliers

To support our offices and core business activities, we engage a wide range of suppliers ranging from multinational organisations to small businesses. In the Reporting Period, we acquired goods and services from over 250 direct suppliers. Plenti has conducted risk assessments on over 130 suppliers which make up over 92% of Plenti's spend on suppliers during the Reporting Period. Of these suppliers, most provide services in the Information Technology (36%) and Industrials (31%) sectors.



Partners

Plenti partners with a range of businesses to assist with distribution of our products, most of whom are based in Australia. These partners include advertisers, finance brokers, renewable energy providers, automotive dealers and manufacturers and loan comparison websites. Plenti considers its partners to be suppliers for the purposes of this Statement and its obligations under the Act. These Partners undergo a separate onboarding and accreditation process prior to distributing our products.

Our supply chain is made up of tiers. Tier 1 in our supply chain comprises the suppliers with whom we have a direct contractual relationship and Tier 2 comprises the suppliers of our Tier 1 suppliers.

Our risk areas

Modern slavery in our operations

As a financial services organisation with a primarily permanent Australian workforce on whom we conduct extensive background screening checks, we have assessed the risk of modern slavery occurring within our operations to be low.

Industry - we operate in the financial services industry group which, according to the NSW Anti-slavery Commissioner's Inherent Risk Identification Tool, presents a minor risk of modern slavery. Our business model does not have the characteristics which enable significant power differentials between employers and workers, such as work seasonality, non-seasonal volatility or restricted competition for labour.

Products - we offer a range of financial (credit and investment) products which, according to the NSW Anti-slavery Commissioner's Inherent Risk Identification Tool, presents a minor risk of modern slavery. Our products are digital and do not rely on vulnerable populations for their manufacture. As such, they do not expose us to the types of modern slavery risks which are more commonly associated with other classes of products, such as agriculture or manufacturing. While we engage a labour-hire provider in Vietnam to provide IT engineering services, these services are not considered low-skilled and we have taken reasonable steps to mitigate the associated modern slavery risk.

Regulatory - our business operates within a tightly enforced regulatory environment which includes comprehensive and effective laws relating to wages, unfair dismissal, collective bargaining and dispute resolution. Additionally, as described in this Statement, we have robust risk and governance frameworks to ensure any modern slavery risks are identified, assessed, documented and mitigated.

Geography - we operate in Australia which, according to the Global Slavery Index, has a strong government response to modern slavery and very low modern slavery vulnerability and prevalence. This is linked to Australia's regulatory environment (discussed above) but more broadly relates to Australia's strong government response to modern slavery. This includes the strong legal mechanisms Australia has implemented to address identified instances of modern slavery and high levels of effort to address the underlying modern slavery risk factors, such as implementing the Modern Slavery Act.

Risk assessment methodology

Our modern slavery risk assessment primarily comprises of two parts: a supply-chain mapping exercise and a desktop audit. In developing our modern slavery risk assessment, we determined it was appropriate to focus on our Tier 1 suppliers as we have control over which suppliers we engage directly and can more easily engage with those suppliers to minimise any modern slavery risks in our supply chain. During the Reporting Period, we reviewed the adequacy and effectiveness of our risk assessment.

Supply-chain mapping

We further developed our supply-chain mapping by reference to the NSW Anti-slavery Commissioner's Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply-Chains and Inherent Risk Identification Tool. This involved incorporating updated definitions and inherent modern slavery risk ratings associated with product procurement categories. We considered this exercise was necessary to ensure Plenti's overarching risk profile and assessment methodology remained appropriate and consistent with best practice.

Desktop audit

To ensure we that we continue to capture any potential or actual modern slavery risk that may exist in each key Tier 1 supplier's business, we undertook a desktop audit and risk assessment of over 70 suppliers, including all key service providers which represents over 92% of Plenti's spend on suppliers during the Reporting Period.

The desktop audit and risk assessment identifies information we consider to be most relevant to modern slavery risk, including:

- (a) industry and types of goods and services supplied;
- (b) geographic location of supplier operations;
- (c) production or distribution reliance on vulnerable populations;
- (d) supply chain model;
- (e) visibility over supplier operations;
- (f) nature of labour arrangement and practices; and
- (g) existing or planned modern slavery risk mitigation.

This methodology has enabled us to identify the most material modern slavery risks presented by our suppliers.

In future reporting periods, we expect to expand our desktop audit review to a larger proportion of Tier 1 suppliers before assessing suppliers in additional tiers.

Modern slavery risks in our supply chain

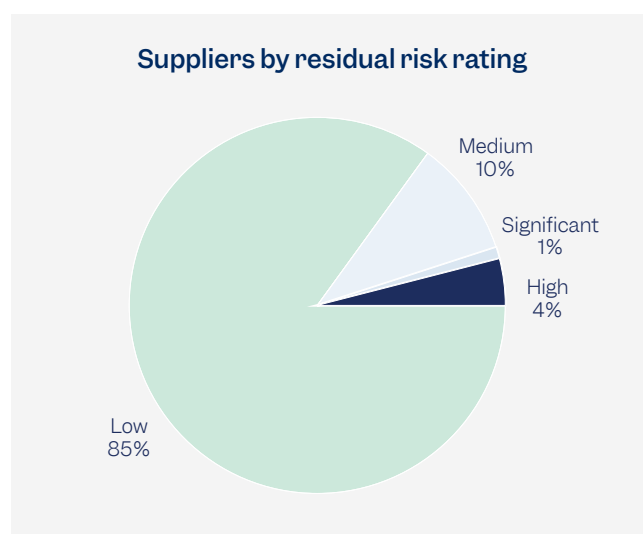
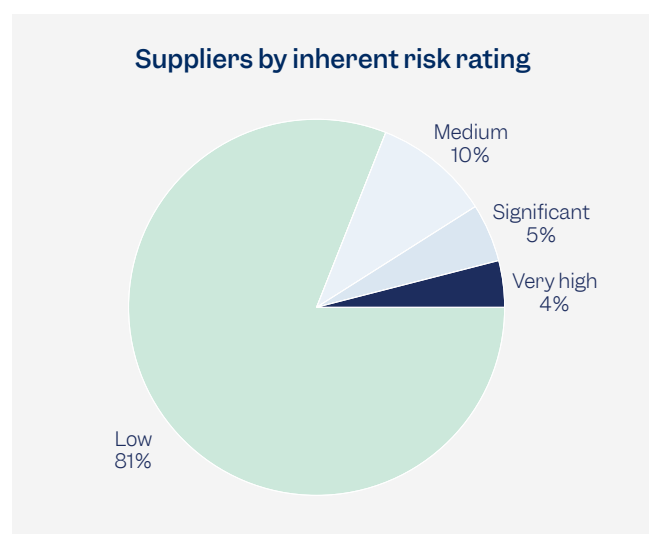
We acknowledge that our activities are not remote from modern slavery risks. In order to conduct our core business activities, we form a wide variety of complex relationships with suppliers in a range of industries in Australia and overseas. Our operations and supply-chains inevitably expose us to modern slavery risks which we seek to identify through our risk assessment process described above.

Our risk assessments identified a range of inherent risks present within our supply chain, such as:

- **Industry:** Our suppliers operate primarily in five sectors: Information Technology (36%), Industrials (31%), Financials (23%), Communication Services (7%) and Real Estate (3%). The NSW Anti-slavery Commissioner's Inherent Risk Identification Tool typically associates the relevant Financials, Real Estate and Industrials sectors as low inherent risk and the Information Technology and Communications sectors as high inherent risk.
- **Geography:** 55% of suppliers presented a low inherent vulnerability as determined by reference to the Global Slavery Index Vulnerability rating, with only one supplier presenting a very high inherent vulnerability.

To manage these inherent risks, we have implemented controls to reduce both the likelihood and consequence of supply chain risk. These controls include:

- Providing suppliers with Plenti's Supplier Code of Conduct;
- Inserting modern slavery clauses in supplier contracts; and
- Confirming suppliers have released a modern slavery statement.



Our actions

During the Reporting Period, in addition to reviewing and updating our modern slavery risk assessment as set out above, we reviewed relevant components of our governance and policy framework to ensure that they continue to be appropriate and effective in managing modern slavery risks within our operations and supply chains.

Governance and policy framework

Each of the following statements, policies and codes assists us to identify, assess, document and mitigate our modern slavery risks and were reviewed during the Reporting Period or have been reviewed since the end of the Reporting Period.

Corporate Governance Statement

We are committed to effective and responsible corporate governance and believe that good governance outcomes are achieved through exemplary ethics, transparency, and openness.

Our corporate governance statement describes the framework we have implemented to establish the roles, duties and responsibilities of Plenti's Board and management, and incorporates Plenti's values, Code of Conduct and risk management framework. The corporate governance framework has been designed to reinforce Plenti's commitment to always acting lawfully, responsibly and ethically in pursuing its business operations and strategic objectives.

Modern Slavery Policy

Our Modern Slavery Policy sets out our approach to managing our modern slavery risk and includes practical guidance and procedures to ensure we appropriately identify, assess, document, report and mitigate our modern slavery risks.

The policy demonstrates our commitment to respecting and supporting the dignity, well-being and human rights of our employees and those who we engage with through our supply chain. This commitment is based on the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and our approach is based on the UN Guiding Principles on Business and Human Rights.

Vendor Management Policy

The purpose of our Vendor Management Policy to capture our existing strategies for managing supply-chain risks and set out the process necessary to manage a range of new and emerging supplier risks. In accordance with this policy, we review all new suppliers to identify, assess, document and mitigate all relevant risks prior to outsourcing any of our processes or services. This policy was updated in the Reporting Period to reflect the improvements made to the supplier onboarding process as set out below.

Employees and training

Prior to starting at Plenti, all new employees undergo a number of background checks, including a national criminal history and bankruptcy check. If these checks are completed successfully, all new employees are required to read and acknowledge all relevant company policies, including our Modern Slavery Policy, which is reviewed at least biennially.

We also conduct annual reviews of our modern slavery training and assessment to ensure all employees better understand how to identify, mitigate and report modern slavery risks.

Consultation and approval

To implement our modern slavery response program, we consulted with key stakeholders from relevant parts of the organisation, including legal and compliance, sales, procurement and people and culture. As all Plenti entities operate as a single consolidated group, detailed consultation with individual entities is not necessary.

Prior to approval by the Board, this statement was reviewed by key members of our Executive Committee, some of whom are also directors of the subsidiaries of Plenti Group Limited listed below:

Entity	ABN
Plenti Group Limited	11 643 435 492
Plenti Pty Limited	29 161 376 638
Plenti Finance Pty Limited	82 636 759 861
Plenti RE Limited	57 166 646 635
Plenti Services Pty Limited	55 672 878 018
Plenti Facility Provider Pty Limited	97 628 882 673
Plenti Corporate Funding No. 1 Pty Limited	12 657 687 986
Plenti Risk Retention No. 2 Pty Limited	20 659 573 627
Plenti Risk Retention No.1 Pty Limited	76 659 572 237



