

ALTX FINANCIAL
GROUP

Modern Slavery Statement

2025

1. Background

AltX Financial Group acknowledges its responsibility to identify, mitigate and address the risk of modern slavery within its business operations, supply chains, and commercial relationships. AltX recognises that modern slavery presents serious human rights risks and that addressing these risks is both a legislative requirement and a core ethical obligation.

AltX is committed to conducting its business in a transparent, responsible and sustainable manner. This includes working with suppliers, contractors and partners to promote ethical labour practices and respect for human rights across our value chain.

This Modern Slavery Statement is prepared in accordance with the Modern Slavery Act 2018 (Cth) and outlines the steps taken by AltX to identify and manage modern slavery risks during the reporting period.

2. The reporting entity to which this Modern Slavery statement applies

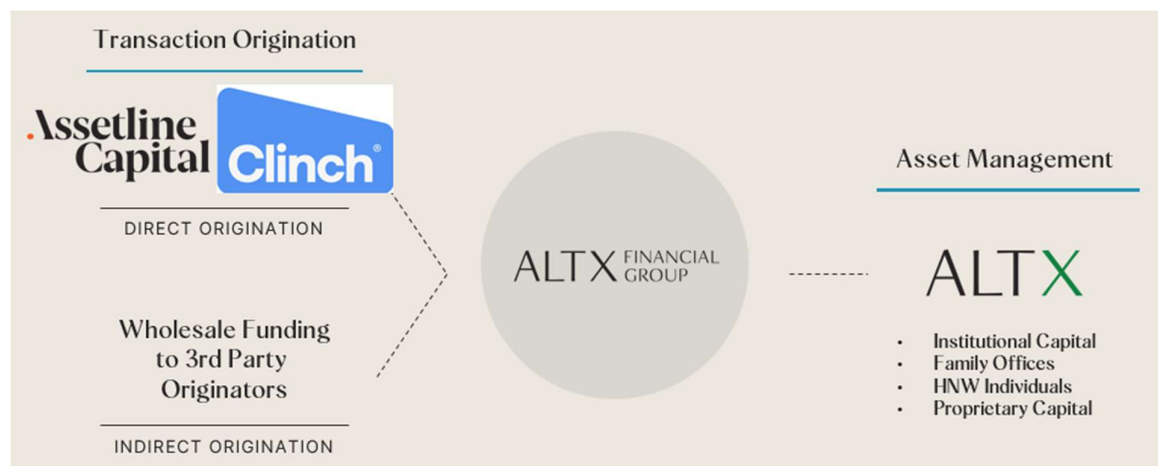
This Modern Slavery statement applies to AltX Ventures Holdings Pty Limited (ABN 15 710 131 449) ("the AltX Group") and the entities it owns or controls (together, AltX Financial Group).

3. AltX Financial Group's structure, operations and supply chains

3.1 Structure

AltX Financial Group is a privately owned financial services company incorporated in Australia. The business was established in 2012 as Assetline Capital, providing non-bank lending solutions to small and medium-sized businesses. Since that time, AltX has expanded its operations and now operates under a holding company structure with multiple operating business units.

AltX Financial Group originates and manages private debt capital transactions through an integrated lending and funds management model.



AltX Financial Group's operating businesses include:

- **Assetline Capital** – a non-bank lender providing tailored property-secured finance solutions to business and consumer borrowers.
- **Clinch** – a specialist short-term consumer property lender.
- **AltX** – a private credit fund manager offering wholesale investors access to real estate debt opportunities originated by the Group.
- **365 Funding** – a wholesale funding platform providing lending capital to approved third-party lenders (sub-originators).

AltX Financial Group is headquartered in Sydney, with offices in Melbourne, Brisbane and Perth, and employs approximately 75 people.

The Group does not operate outside Australia. Certain operational functions are supported by a small, outsourced workforce engaged through a reputable Australian provider.

3.2 Products

Lending Products

AltX Financial Group provides a range of specialist non-bank lending solutions, including:

- SME bridging finance
- Construction and development finance
- Long-term property-secured loans for self-employed and consumer borrowers
- Short-term consumer bridging loans via Clinch
- Private lending solutions outside standard bank parameters
- First-home buyer deposit products (Generate Loans)

Investment Products

AltX offers wholesale investors exposure to property-backed private credit opportunities, including:

- Investments in individual real estate debt transactions
- Investments through AltX's managed credit funds

3.3 Operations and employment practices

All AltX Financial Group operations are conducted within Australia and are subject to applicable financial services, employment, and corporate governance laws.

The Group holds and operates under an Australian Financial Services Licence and an Australian Credit Licence.

Employees are engaged under individual employment contracts, and employment practices are aligned with federal and state workplace legislation. AltX Financial Group maintains internal policies covering ethical conduct, employment practices and workplace protections.

Supply Chains

AltX Financial Group's supply chain primarily consists of professional and support services required to deliver lending and investment activities. These include:

- Capital providers and investors
- Mortgage brokers and distribution partners
- Legal, compliance and regulatory advisers
- Information technology and software providers
- Office, facilities and administrative service providers
- An outsourced workforce engaged through a third-party Australian provider

AltX Financial Group's supply chains are predominantly service-based and located within Australia.

4. The Risks of modern slavery practices in the operations and supply chains of AltX Group and the entities it owns or controls

AltX Financial Group operates in sectors where the inherent risk of modern slavery is considered low; however, the Group acknowledges that risks may still arise through indirect business relationships.

Potential areas of modern slavery risk include:

- **Supplier engagement**
Certain suppliers and contractors may operate in industries historically exposed to labour exploitation risk, including construction, facilities management, technology services and professional consulting.
- **Lending and investment activities**
Through construction and development finance, there is an indirect risk that borrowers, developers or project participants may engage subcontractors operating in higher-risk environments.
- **Outsourcing arrangements**
While outsourced services are provided by an Australian company, there remains a need to ensure appropriate labour practices are maintained throughout subcontracting arrangements.

Following assessment, AltX Financial Group considers the risk of modern slavery within its direct operations to be extremely low, with limited indirect risk arising through third-party relationships.

5. Actions taken by AltX Financial Group to assess and address modern slavery risks

AltX Financial Group integrates modern slavery considerations into its broader approach to environmental, social and governance (ESG) management. Respect for human rights across the value chain is reflected within the Group's ESG Policy and supplier engagement practices.

Key actions include:

- engaging reputable Australian service providers with publicly articulated commitments to ethical labour practices
- considering modern slavery risk during supplier selection and ongoing relationship management
- maintaining internal governance frameworks that promote ethical conduct and accountability

AltX Financial Group's outsourced workforce provider, TryPod Australia Pty Ltd, maintains a Modern Slavery Policy outlining its commitment to ethical employment practices and human rights protections.

Should any indicators of modern slavery be identified, AltX Financial Group is committed to promptly investigating the matter and taking appropriate remedial action.

6. How AltX Financial Group assesses the effectiveness of these actions

AltX Financial Group evaluates the effectiveness of its modern slavery risk management approach through ongoing governance and oversight arrangements.

This includes:

- periodic review of ESG-related risks and controls
- engagement with internal stakeholders across business units
- quarterly ESG Committee meetings, during which third-party practices and emerging risks are considered

Findings from these reviews inform continuous improvement of policies and processes.

7. The process of consultation by AltX Financial Group

This Statement was prepared in consultation with senior executives and representatives from across AltX Financial Group's operating businesses to ensure it accurately reflects the Group's operations, risks and practices.

8. Other relevant information

At the date of this Statement, there is no additional information required to be disclosed.

This Statement was approved by the Board of AltX Ventures Holdings Pty Limited on 24 March 2026 and is signed by Nicholas Raphaely in his role as the Key Principal.



Nicholas Raphaely
Director
AltX Ventures Holdings Pty Limited
24 March 2026