

Modern Slavery Statement FY2021

Objective and scope

This Modern Slavery and Human Trafficking Statement (Statement) is made pursuant to the Modern Slavery Act 2018 by Mortgage Choice Pty Limited (ABN 57 009 161 979) (Mortgage Choice) relating to the financial year 1 July 2020 to 30 June 2021 (FY2021). Mortgage Choice and its subsidiary FinChoice Pty Ltd (FinChoice) are subject to the requirements of the Australian Modern Slavery Act 2018 (Cth) and these requirements are incorporated in this Statement.

This Statement applies to Mortgage Choice and its subsidiary FinChoice Pty Ltd, referred to collectively hereafter as Mortgage Choice, 'us' and 'we'. From 1 July 2021 the entirety of the available shares in Mortgage Choice were acquired by a wholly owned subsidiary of REA Group (ABN 068 349 066) (REA) and accordingly for the financial year 1 July 2021 to 30 June 2022 Mortgage Choice will be consolidated into the REA Statement.

Mortgage Choice is committed to achieving a high level of ethical behaviour and integrity in the conduct of its operations. We recognise that we have responsibilities to our employees, franchisees, customers and the broader community and aim to have a positive impact on society.

The consultation process included engagement with the Chief Executive Officer and common Company Secretary for FY21 for both entities. The Boards of each reporting entity have approved this statement and further information about the approval of this statement is set out on page 6.

1. About our business and its risk regarding modern slavery practices

During the entirety of FY2021 Mortgage Choice (then Mortgage Choice Limited) was an ASX listed (MOC) Mortgage Broking firm offering expert assistance with home loans, car loans and insurance, commercial loans, home buildings and contents insurance, landlord insurance, equipment finance, business finance and mortgage protection insurance through a network of franchise businesses across Australia. Mortgage Choice assisted customers with obtaining A\$12.9 billion in home loans in FY21.

FinChoice provides expert financial advice and assistance with personal insurance, superannuation, investment, budgeting, debt management, retirement planning and estate planning through a network of franchise businesses across Australia. FinChoice has over A\$1.39 billion in funds under management on behalf of our clients as at 30 June 2021.

In FY2021 we were headquartered in North Sydney, Australia with over 100 employees across 5 locations around Australia.

Risk of modern slavery practices

We take the risk of modern slavery seriously and support maintenance of human rights for all on a fundamental moral basis. All employees and directors are responsible for knowing and following the ethical, legal and policy requirements that apply to their jobs and for reporting any suspected breaches of law or our Supplier code of conduct. Our executives and managers are accountable for creating and promoting a workplace environment in which compliance and ethical business conduct are expected, encouraged and supported. The way we do business greatly mitigates the risk of modern slavery being present in our business. However, we do recognize that we have a responsibility to minimize the risk of modern slavery becoming present in our supply chains in a proactive manner. Accordingly, we have tailored our risk processes to ensure that we are focusing our efforts on those areas that present an elevated risk of exposure.

Service Providers

In FY2021 Mortgage Choice considered its supply chains to include whether any further due diligence was required as a result of the changed way of working as a result of the COVID-19 Pandemic. Mortgage Choice's supply chains include suppliers for goods and services provided in respect of:

- Recruitment,
- Travel,
- Marketing and Communication,
- Mail and Logistics,
- IT and Telecommunications,
- Cleaning,
- Catering and Hospitality
- Facilities Management,
- Business Process Outsourced administration.

We seek to engage suppliers that have similar values and business ethics to ourselves to minimize risk. Mortgage Choice engages the support of business processing offshore suppliers and the review of the supply chain continues to acknowledge the potential vulnerability of the employees of these suppliers to the risks of Modern Slavery. As previously disclosed Mortgage Choice engages in heightened due diligence including understanding the terms of the agreement between the supplier and employee as to salary rate, mandated break times and loading for overtime, public holidays and non working days. Mortgage Choice's due diligence also includes a physical premises inspection prior to onboarding a new Business Process Outsourcing supplier however the COVID-19 Pandemic impacted the ability of Mortgage Choice to perform such premises

inspections. Accordingly, there was no changes to the Business Process Outsourced administration supply panel during the FY22 Financial Year.

2. Actions taken by Mortgage Choice to address Modern Slavery risks - FY2021

In FY2021, Mortgage Choice continued to embed the Modern Slavery due diligence process for new supplier relationships. We continue to ensure that new and renewed supplier contracts contain appropriate warranties and obligations relating to the prevention of Modern Slavery and human trafficking.

Due Diligence Processes

Mortgage Choice performs due diligence when considering obtaining goods or services from new suppliers, or reviewing its arrangements with existing suppliers. The organisation's due diligence and reviews include:

- Considering the geographic location of the supplier;
- Considering the activities to be performed or goods to be supplied by the supplier;
- Seeking feedback from franchisees

Where an elevated risk of Modern Slavery is identified, the organisation performs enhanced due diligence

Code of Conduct

Our Codes of Conduct continue to be reviewed to bolster our commitment to addressing Modern Slavery risks in our business and driving accountability for ethical business practices across our organisation. From FY22 these Codes of Conduct will be replaced with those of the REA Group.

Monitoring Supplier Code of Conduct

The Supplier Code of Conduct sets out the minimum expectations for our suppliers and third party labour providers related to ethical practices including addressing Modern Slavery risks in their business. We continue to build awareness with our suppliers and employees in relation to the Supplier Code of Conduct. From FY22 the Supplier Code of Conduct will be replaced with REA Group's Supplier Code of Conduct.

Supply contract provisions

Our template supply contracts include the requirement for suppliers to:

- Comply with Mortgage Choice's Supplier Code of Conduct
- Comply with all applicable anti-slavery and human trafficking laws
- Notify us of any actual or suspected breach of any Modern Slavery laws

- Provide warranties that they have complied with Modern Slavery laws

We continued to embed the expectation with our suppliers that they will engage with their suppliers on similar terms. We wish to work in partnership with our suppliers to address risks of Modern Slavery that exist.

Training

We have continued with our education of for relevant staff in our business in procurement, recruitment, compliance, legal and risk teams to raise awareness of Modern Slavery risks and how they may arise in our business.

Whistleblower policy

Mortgage Choice maintains a Whistleblower policy appropriate for the size and scale of the organisation. The Whistleblower policy includes the ability for suppliers and their employees to provide a report to Mortgage Choice and receive protections under the Whistleblower policy. This commenced on 1 January 2020 and will be replaced with REA Group's Whistleblower policy and associated processes in FY22.

Remediation

Mortgage Choice remains committed to reviewing reported concerns or incidents and, if substantiated, taking appropriate steps to address the issues raised.

We are also committed to maintaining the integrity of the reporting and investigation processes. All substantiated incidents of Modern Slavery will be formally documented, investigated and reported to the General Counsel & Company Secretary, and to the Audit & Risk Committee.

3. COVID-19 impacts on Mortgage Choice

Mortgage Choice took steps to protect vulnerable workers in our global supply chain from the impacts of COVID-19. In particular, Mortgage Choice continued to support individuals to provide services remotely to ensure an ongoing safe working environment.

4. Assessment of effectiveness

The effectiveness of mitigation actions taken will be generally assessed by:

- Concerns or complaints raised internally or externally being collated and escalated as required for executive team review
- Policies and procedures being subject to regular internal review
- Regular monitoring of suppliers

All contracts are required to undergo legal review prior to execution. This review allows suppliers' acceptance of template Modern Slavery provisions to be monitored and reported to the Chief Financial Officer who in FY21 was ultimately responsible for risk management in the organisation.

5. Next Steps

We are fully committed to the highest ethical standards and will continue to review the effectiveness of our policies, procedures and training to improve our ability to detect, mitigate and reduce the risk of Modern Slavery and human trafficking with our business and supply chain. For FY22, we intend to follow through with the following key actions:

1. rollout of the REA Group Modern Slavery Policy, Supplier Code of Conduct, modern slavery risk assessment criteria and Supplier Assessment Questionnaire to the Mortgage Choice business;
2. integrating the Mortgage Choice business with REA Group's procurement and supplier due diligence processes;
3. further embedding the Supplier Code of Conduct into the contracts of higher risk suppliers, as those contracts come up for renewal; and
4. undertaking modern slavery due diligence on an expanded group of REA Group suppliers.

6. Authority

This statement was approved by the Boards of Mortgage Choice Pty Limited and FinChoice Pty Ltd on 20 December 2021.

Signed



Janelle Hopkins
Director