

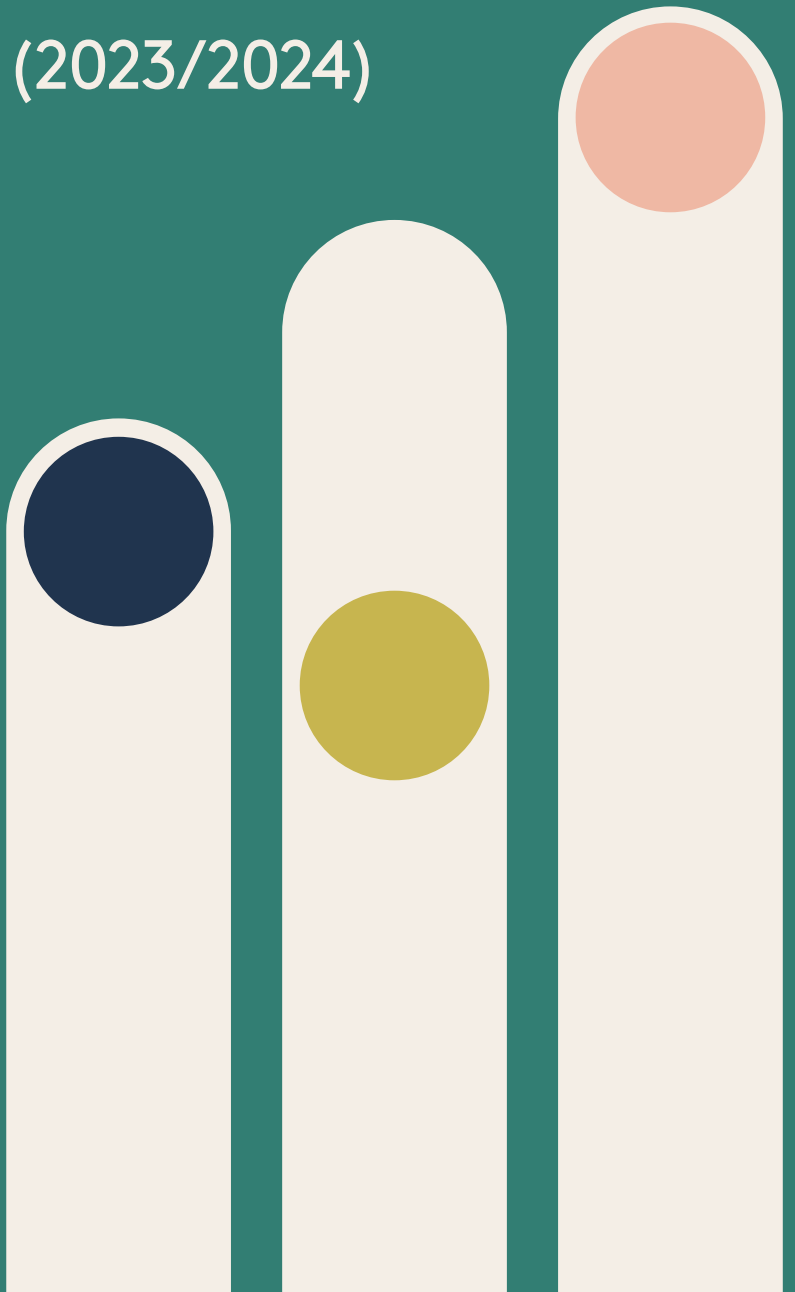
Modern Slavery Statement.

Loan Market Group (2023/2024)

Better begins *here*



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Introduction

This Modern Slavery Statement is a joint statement (**Statement**) made by Loan Market Group Pty Ltd (ABN 83 105 221 967) (**LMG**) and the following subsidiaries:

- Loan Market Pty Ltd (ABN 89 105 230 019) (**Loan Market**)
- LMG Broker Services Pty Ltd (ABN 67 632 405 504) (**Broker Services**)
- PCF Group Pty Ltd (ABN 35 645 708 087) (**PCF**)
- Professional Lenders Association Network of Australia Pty Ltd as trustee for PLAN Australia Unit Trust (ABN 24 086 084 832) (**Plan**)
- Pennley Pty Ltd as trustee for Pennley Unit Trust (ABN 53 348 526 415) (**Choice**)
- Finance & Systems Technology Pty Ltd (ABN 86 092 660 912) (**Fast**),

(collectively, **the Group**) under section 14(1) of the *Modern Slavery Act 2018* (Cth) (**Act**).

The Statement describes the actions LMG has during the financial year ended 30 June 2024 (**reporting period**) to identify and reduce the risks of modern slavery in our operations and supply chains in accordance with the Act.

Slavery is a crime and violates fundamental human rights. LMG is committed to ethical business practices and legal compliance and we expect our staff to embrace that commitment. During the reporting period we have:

- conducted a targeted risk assessment on modern slavery within our existing operations and supply chain
- undertaken multiple site inspections of our key offshore service providers' offices in the Philippines
- expanded the provision of modern slavery training to all corporate staff in Australia to reflect our commitment to ensuring that every employee, not just senior management and those involved in procurement, understands how they can help us identify and manage modern slavery risks
- analysed the actions of our peers in addressing modern slavery risks, to assist with identifying any opportunities for improvement
- ensured, where commercially appropriate, that new and any existing material supply arrangements that have been renegotiated include obligations on the supplier to comply with modern slavery laws.

Structure and Operations

LMG was founded in 1994 and is the largest and most progressive aggregator group across Australia and New Zealand. We act primarily as an intermediary between lenders and a community of over 6,000 brokers and advisers through Loan Market, Broker Services, Plan, Choice and Fast. Our goal is to help brokers to deliver great customer outcomes and run better, more profitable businesses.

In addition, we also make a range of insurance products available to brokers for distribution to customers through referral arrangements with insurers.

Proudly family-owned and led, we provide professional, administrative, management, compliance, training and technology services to the brokers that engage us, enabling those brokers to offer their customers products from more than 65 banks and lenders. At the end of the reporting period, we provided services to 429 franchisees who chose to operate their businesses under the Loan Market Brand and a further 2,057 businesses operating under their own brands.

We also operate businesses in complementary sectors that support our primary operations, including SaaS through MyCRM Pty Ltd (ABN 13 611 785 561).

We provide mortgage aggregation services in New Zealand through a local subsidiary, NZ Financial Services Group Ltd.



Operations

The Group operates from business premises in Sydney, Brisbane, Melbourne, Perth and Adelaide, and in Auckland and Wellington in New Zealand. The Group employed 401 people in Australia and a further 33 in New Zealand at the end of the reporting period. The workforce is comprised primarily of office-based professionals and other skilled labour.

Our workforce comprises of sales and distribution professionals, technology developers and support staff, finance, tax, legal, customer operations and engagement, marketing, data analytics, payroll, administrative and HR teams. The majority of our workforce is engaged on an ongoing basis, although we utilise a small pool of casual employees, contractors and external consultants.

All of our employees are over 18 years and receive written contracts of employment.

Most of our staff are not covered by modern awards, although we are a member of the Financial Institutions Remuneration Group Inc (**FIRG**) and lodge data with FIRG twice annually. All of our employees are paid more than minimum wage and we utilise the data available as a FIRG member and review staff salaries annually against market data to ensure that our staff are fairly remunerated.

Additionally, we have several policies, procedures, codes of conduct, and standards that reflect our ethics and values. They guide the way we treat our employees and demonstrate our commitment to conducting business with integrity, probity, and accountability.

These policies include:

- Employee Code of Conduct
- Grievance Procedure
- Whistleblower Policy
- Flexible Working Policy
- Bullying, Harassment & Discrimination Policy

We operate a number of programmes to support professional development and the health and safety of our staff, including operating an Employee Assistance Program to support staff in dealing with personal, family and/or work-related concerns. We aim for continuous improvement in our treatment of our staff and frequently review the efficacy of our programmes in rewarding and supporting them.

We also utilise the services of offshore providers to complement our onshore workforce. The services we acquire from these providers are mainly in relation to technology development and administrative support. More detail on these offshore providers is included in the supply chain section of this report.

Having regard to the industry in which we operate and the nature of our workforce, we consider the risk of modern slavery issues in our operations to be very low.

Although the brokers that we support are independently owned and operated businesses, and so fall outside the scope of this Statement, because of our close connection between these entities, we continue to consider how we may offer them more support to mitigate modern slavery risks in their businesses.

Supply Chain

During the reporting period, we again mapped our supply chain and identified our largest suppliers by dollar value. We also identified within this group of suppliers those that might be expected to pose the greatest modern slavery risk having regard to the industries in which those suppliers operate, their primary place of operation and the goods and services they supplied.

Our modern slavery review focused on our first-tier suppliers that accounted for more than 80% of our procurement spend. Reflecting our commitment to our modern slavery action plan, we continue to focus on our material suppliers.

These suppliers operate in the following industries:

- Commercial property leasing, including offices in Sydney, Brisbane, Melbourne, Perth, Adelaide, Auckland and Wellington
- Internet, software and technology services, including property data and analytics
- Banking and financial services (including credit cards)
- Professional services including accounting, legal and tax advisory services
- Insurance broking services including insurance for professional indemnity, directors and officers, occupational safety and health, cyber security and workers' compensation
- Domestic and international travel services and accommodation
- Events management and venue hire
- Media, advertising and recruitment services.

The suppliers we reviewed were predominantly domiciled in jurisdictions identified in the 2023 GSI as having:

- a lower prevalence of modern slavery, including Australia, Canada, Germany and New Zealand; and/or
- a strong governmental response to modern slavery, including Australia, the United Kingdom, USA, Canada and Germany.

We understand that each of our suppliers will, however, have their own global supply chains, which may include suppliers of higher risk jurisdictions or sectors.

During the reporting period, we also contracted with three suppliers who provide offshore based workforces to aid in our operations, all based in the Philippines. Noting that the Philippines was identified as having a modern slavery prevalence index materially greater than Australia, we actively monitor and manage modern slavery risk with these suppliers.

This has included:

- multiple site-visits through the year;
- maintaining regular and direct contact with the Philippines-based workforce, including direct meetings with individual workers;
- obtaining and reviewing copies of their anti-slavery policies; and
- direct welfare check-ins with individual workers following natural disasters.

Modern Slavery Risks

We recognise that modern slavery is a significant problem and that it can be difficult to identify in global supply chains. We have not identified any instances of modern slavery in our operations or supply chains or any first-tier suppliers with modern slavery risk in their operations, including our review of our Philippines-based suppliers described earlier in this statement.

Within our broader supply chain, however, we appreciate that there are suppliers from industries that have been identified as inherently high risk, including:

- cleaning and facilities maintenance
- hospitality, food and agriculture
- electronics and IT hardware
- utilities
- manufacturing, including of corporate merchandise
- logistics including shipping and delivery services.

A number of our key suppliers have identified risks of this nature in their own supply chains.

We operate in lower risk industries and, primarily, in countries that are not categorised as high risk from a modern slavery perspective. Our risk assessment has been based upon the geographic, industry and sector profiles published in the 2023 GSI and having regard to information and resources published by other organisations.

Our Whistleblower Policy applies to reports by staff, suppliers, franchisees and the brokers we support to report possible contraventions of legislation guiding the operation of our businesses. As a responsible franchisor we expect our franchisees to comply with the Fair Work Act, and we promote our Whistleblower Policy to our franchisees and associated personnel. We have reviewed the reports made pursuant to our Whistleblower Policy in the reporting period and have not identified any red flags for modern slavery.

We recognise that the processes and policies we have adopted will need to continue to mature over time to address the risks of modern slavery in our operations and supply chain.

We have also not identified any issues that would suggest modern slavery issues exist within our franchise network, the other broker businesses that we support or within any Group entity. Nor have we received any reports from staff or the franchisees and other broker businesses we support regarding modern slavery issues. The continued absence of any evidence or concerns regarding modern slavery means we remain of the view that the risk of modern slavery issues in our operations.

Action Plan

Where commercially appropriate and practicable, we continue to incorporate clauses in our supplier agreements to address modern slavery risks. These clauses include representations that the supplier will not engage in any modern slavery practices and, if they discover such practices, they will notify us, and they will investigate and remediate such practices.

Our franchise and broker agreements also require the brokers we support to use reasonable efforts to ensure they, their affiliates and suppliers comply with Modern Slavery laws.

During the reporting period, we continued to review our material suppliers. Our review covered more than 80% of our procurement spend. We also considered which of this group of suppliers might be expected to pose the greatest modern slavery risk having regard to the industries in which those suppliers operate, their place of operation and the goods and services they supplied.

We will continue to require supplier questionnaires be completed by material suppliers who don't currently appear on the Australian Modern Slavery Register. This data will help us identify if any modern slavery risks exist, and how they can best be addressed and indicate whether further screening and analysis needs to be conducted before onboarding new suppliers into our supply chain.

In addition to the questionnaire process, we conduct onsite audit of our key offshore service partners in the Philippines at least annually and undertake site visits throughout the year.

We provide modern slavery training to all of our staff annually to help explain modern slavery practices and maintain awareness of this issue. We expect all of our staff to provide a first line of defence in the identification of modern slavery risks.

We are exploring appropriate resources and training that we can provide to the brokers that we support to raise awareness in the broader community.

We established a working committee that meets regularly to discuss modern slavery issues and the steps that should be considered to assess and address any modern slavery risks. During 2025, the committee will (amongst other things) consider updates to our modern slavery policy documents.

Effectiveness

Our modern slavery working committee has day-to-day responsibility for implementing our commitments and the Board of LMG, being the principal governing body for the reporting entities, oversees our anti-slavery programme.

We are pleased to confirm that we received no reports of modern slavery practices from staff, suppliers, brokers or franchisees during the reporting period. Nor have we identified any modern slavery practices during this period.

We recognise, however, that the process of assessing and addressing modern slavery risks is a complex and ongoing task and understand that our efforts in this area must be monitored, reviewed and updated regularly to ensure they are effective.

Unfortunately, we did not achieve our aim of making training available to brokers during the reporting period. We are prioritising this for 2025.

We remain committed to undertaking risk-based modern slavery due diligence on our Tier 1 suppliers. Ensuring those suppliers understand that we will require them to determine the cause of any problem identified, establish an action plan to correct the problem and report on the outcome of those actions, remains a key part of our strategy and contributes to our effectiveness in addressing these risks.

Consultation

LMG is fully beneficially owned and controlled by members of the White family. Senior members of the White family are directors of Loan Market Group Pty Ltd and are responsible for its key operations. They were consulted and informed of Australia's modern slavery reporting obligations.

Each of the members of the Group share common executives, who are responsible for the entire Group (see page 1 for a list of reporting entities in the Group). This includes all of the members of the modern slavery working committee. The corporations that constitute the Group also all have common directors. Accordingly, each of the members of the Group who are reporting pursuant to this Statement, including their owned or controlled entities, have been consulted in the preparation of this Statement. It was approved by the board of directors of Loan Market Group Pty Ltd (being the principal governing body for the reporting entities) 16 December 2024.

This statement is signed by Ewen Stafford in his role as a director of Loan Market Group Pty Ltd on 19 December 2024.

A handwritten signature in black ink that reads "Ewen Stafford". The signature is written in a cursive, flowing style.

Ewen Stafford
Director, LMG

Annexure – Reporting Criteria

Service/Solution	Page
1 & 2. Identify the reporting entity and describe its structure, operations and supply chains	1-4
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	5
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	6
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	7
6. Describe the process of consultation with any entities the reporting entity owns or controls or other reporting entities if this is a joint statement	8



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