

# Modern Slavery Statement 2021

REA Group Ltd (ACN 068 349 066)

realestate.com.au Pty Limited (ACN 080 195 535)

## REA Group is a multinational digital advertising business specialising in property.

REA Group's purpose is to 'change the way the world experiences property' by:

- providing compelling property advertising services for real estate agents and property developers;
- providing digital tools, information and data for people interested in property; and
- helping property buyers and owners to finance their property needs.

This statement is a joint modern slavery statement (Statement) for the year ended 30 June 2021 covering REA Group Ltd (REA Ltd) and its wholly owned subsidiary realestate.com.au Pty Limited (realestate.com.au), with both REA Ltd and realestate.com.au being reporting entities under the Modern Slavery Act 2018 (Cth) (Act). This Statement is prepared for the purposes of, and in accordance with, section 14 of the Act.

As at 30 June 2021, REA Ltd was the ultimate holding company of 43 subsidiaries, including realestate.com.au (collectively, REA Group, We, Our or Us). This Statement sets out the steps that REA Ltd and realestate.com.au (and where applicable, any entities owned or controlled by REA Ltd and realestate.com.au) have taken to assess and address risks of modern slavery within REA Group's operations and supply chains. REA Ltd and realestate.com.au have shared internal policies and procedures and shared procurement, finance, risk, people and culture and legal functions. Where this Statement describes steps taken by REA Group to assess and address modern slavery risks, those steps have been taken on behalf of both reporting entities.

1. A full list of REA Ltd's controlled entities is set out at pages 118-9 of [REA Group's 2021 Annual Report](#) and annexed to this Statement. A simplified corporate structure chart is also annexed.
2. Mortgage Choice Limited (ABN 57 009 161 979) was acquired by REA Group Ltd under a Scheme of Arrangement effective 18 June 2021, with an implementation date of 1 July 2021. Mortgage Choice Limited is a reporting entity under the Act and will lodge its own modern slavery statement for the year ended 30 June 2021.

## Our commitment to human rights

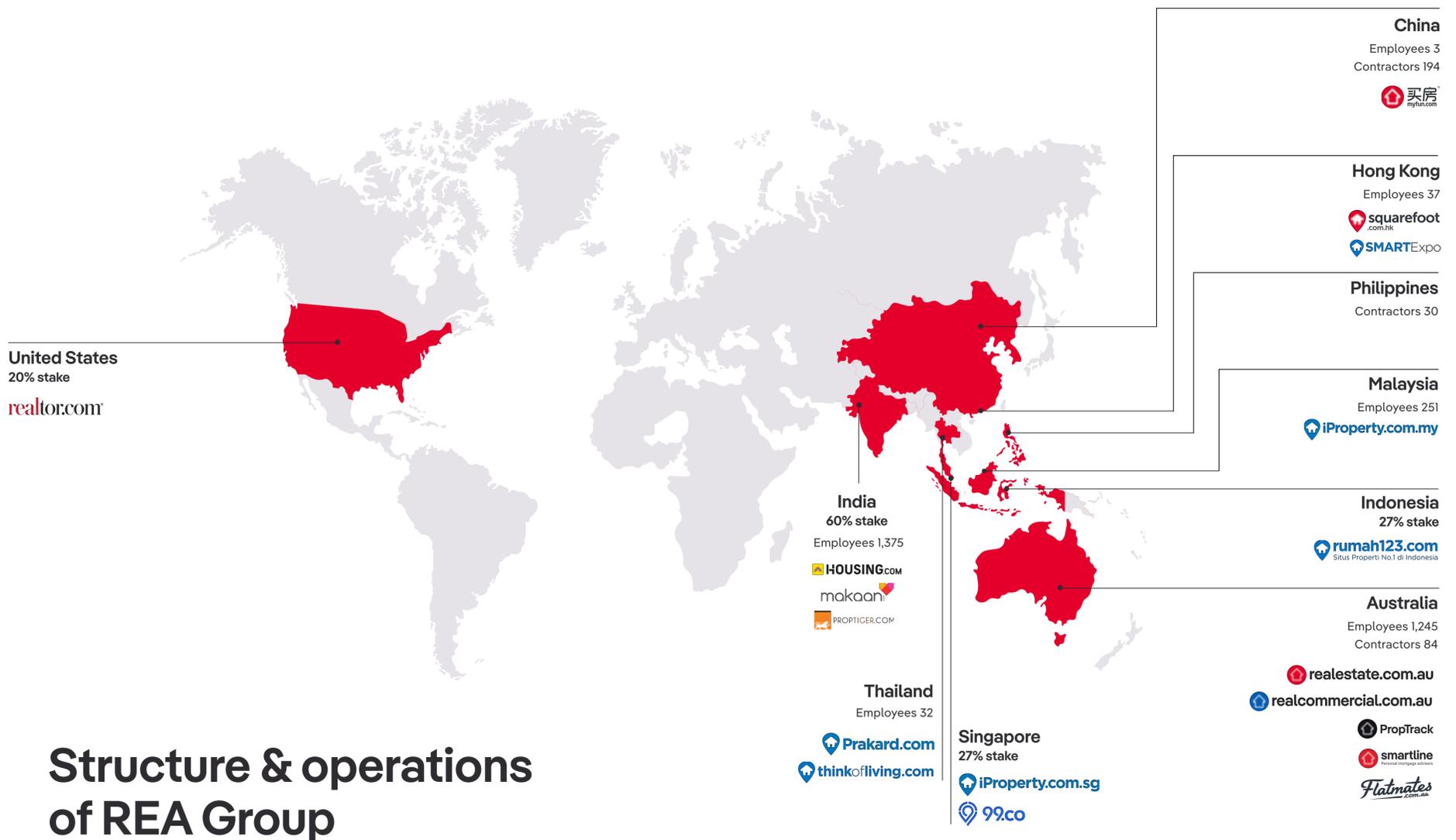
REA Group recognises the importance of combating modern slavery, which adversely affects workers and communities worldwide.

We are committed to respecting and promoting human and labour rights within our operations and supply chains. Doing business in a way that promotes the highest levels of business ethics and integrity is central to how we operate, and REA Group's value of "Do it with Heart" reflects the importance we place on caring for our workforce, customers, consumers and our broader community.

We have developed processes to ensure that we act responsibly and with care to protect against risks of modern slavery. REA Group is committed to taking action to identify, assess and address risks of modern slavery in our operations and supply chains.

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Section	Requirement	Reference in our statement
16(1)(a)	Identify the reporting entity	Introduction <b>page 01</b>
16(1)(b)	Describe the structure, operations and supply chains of the reporting entity	Structure & operations of REA Group <b>page 03</b>  REA Group's Supply Chains <b>page 04</b>
16(1)(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Overview of modern slavery risks <b>page 07</b>  Risks that we cause, contribute to or are linked to modern slavery practices through our operations or supply chains <b>page 08</b>
16(1)(d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Actions taken by REA Group to assess and address modern slavery risks, including due diligence and remediation processes <b>page 09</b>  Supplier due diligence for higher risk suppliers <b>page 09</b>  Remediation processes <b>page 11</b>
16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions	Assessing the effectiveness of our actions <b>page 12</b>  Key performance indicators <b>page 12</b>
16(1)(f)	Describe the process of consultation with any entities that the reporting entity owns or controls	Consultation between REA Ltd, realestate.com.au and their subsidiaries <b>page 12</b>
16(1)(g)	Include any other information that the reporting entity considers relevant	Other relevant matters - COVID-19 impacts <b>page 13</b>  Modern Slavery Policy <b>page 13</b>



## Structure & operations of REA Group

REA Ltd (ASX: REA) is an ASX listed public company with headquarters in Melbourne.

REA Ltd is the ultimate holding company of REA Group but does not directly operate any of the group's businesses. Realestate.com.au is the primary operating entity of REA Group and is responsible for operating the group's well known property advertising websites in Australia.

As at 30 June 2021, REA Group had direct business operations through subsidiaries in Australia, Malaysia, Thailand, Hong Kong, China and India, as well as minority shareholdings in businesses operating in Singapore, Indonesia and the United States.<sup>3</sup> A simplified corporate structure chart for REA Group is annexed to this statement.

### Our workforce

**Direct workforce:** REA Group's direct workforce consists of over 2,900 skilled employees, including software developers and engineers, digital product managers, marketing and sales staff, customer service, finance, risk, procurement, cybersecurity and legal personnel. These employees are predominantly full-time employees and work from REA Group offices.

REA Group's subsidiary Smartline acts as the franchisor of a mortgage broking franchise which supports 420 Smartline franchisees.

**Indirect workforce:** REA Group has an indirect workforce consisting of 194 skilled technology contractors based in Xian, China and 30 administrative contractors based in Manila, Philippines. These workers are engaged through consultancy companies based in Australia, with service delivery taking place from offshore offices of these consultancies.

### Main operating activities of controlled entities:

Development and operation of websites and mobile software applications for the advertising of real estate.

### Key brands

- Australia:** realestate.com.au, realcommercial.com.au, Flatmates
- China:** 买房 myfuu.com
- Hong Kong:** squarefoot.com.hk, SMARTExpo
- India:**
- Malaysia:** iProperty.com.my
- Thailand:** thinkofliving.com, Prakard.com

Development and provision of digital tools and data services for the real estate industry.

- Australia:** PropTrack, realestate.com.au

Provision of mortgage broking services through a network of franchisee brokers and a digital home loan experience.

- Australia:** smartline

<sup>3</sup> A full list of REA Ltd's subsidiaries is set out at pages 118-9 of REA Group's 2021 Annual Report and annexed to this Statement.

## REA Group's investment activities

REA Group held minority stakes in a number of property advertising portals in overseas markets, including, as at 30 June 2021:

- a 20% interest in realtor.com in the United States; and
- a 27% interest in iproperty.com.sg and 99.co in Singapore and rumah123.com in Indonesia.

REA Group also holds minority interests in the following Australian based real estate tech businesses:

- a 27% interest in Managed, an Australian property management software platform;
- a 22% interest in Realtair, an Australian provider of workflow tools for real estate agents;
- a 27% interest in Campaign Agent, an Australian provider of buy now pay later solutions for the real estate market; and
- a 34% interest in Simpology, an Australian business providing mortgage application and e-lodgement solutions for the broking and lending industries.

In December 2020, REA Group increased its ownership interest in Elara Technologies Pte Ltd (Elara), the operator of housing.com, proptiger.com and makaan.com in India. As at 30 June 2021, REA Group holds a controlling 60% interest in the Elara business and is in the process of integrating the Elara business with REA Group systems and policies.

While REA Group generally holds board seats on companies in which it has minority interests, it is not involved in the day-to-day operations of these businesses.

## REA Group's supply chains

### Operating Model

REA Group operates a central procurement team located in Melbourne that is responsible for high value or complex procurement of goods and services, on behalf of REA Group businesses.

This team administers several of the key policies addressing supply chain risks, including modern slavery risks. Lower value procurement decisions are decentralised across REA Group's various business units and geographies.

The nature of REA Group's supplier relationships is highly variable. REA Group has written contracts with most suppliers, which are on a rolling 1-2 year contract cycle. Some supplier arrangements are subscription based and can be varied or terminated on a short notice period.

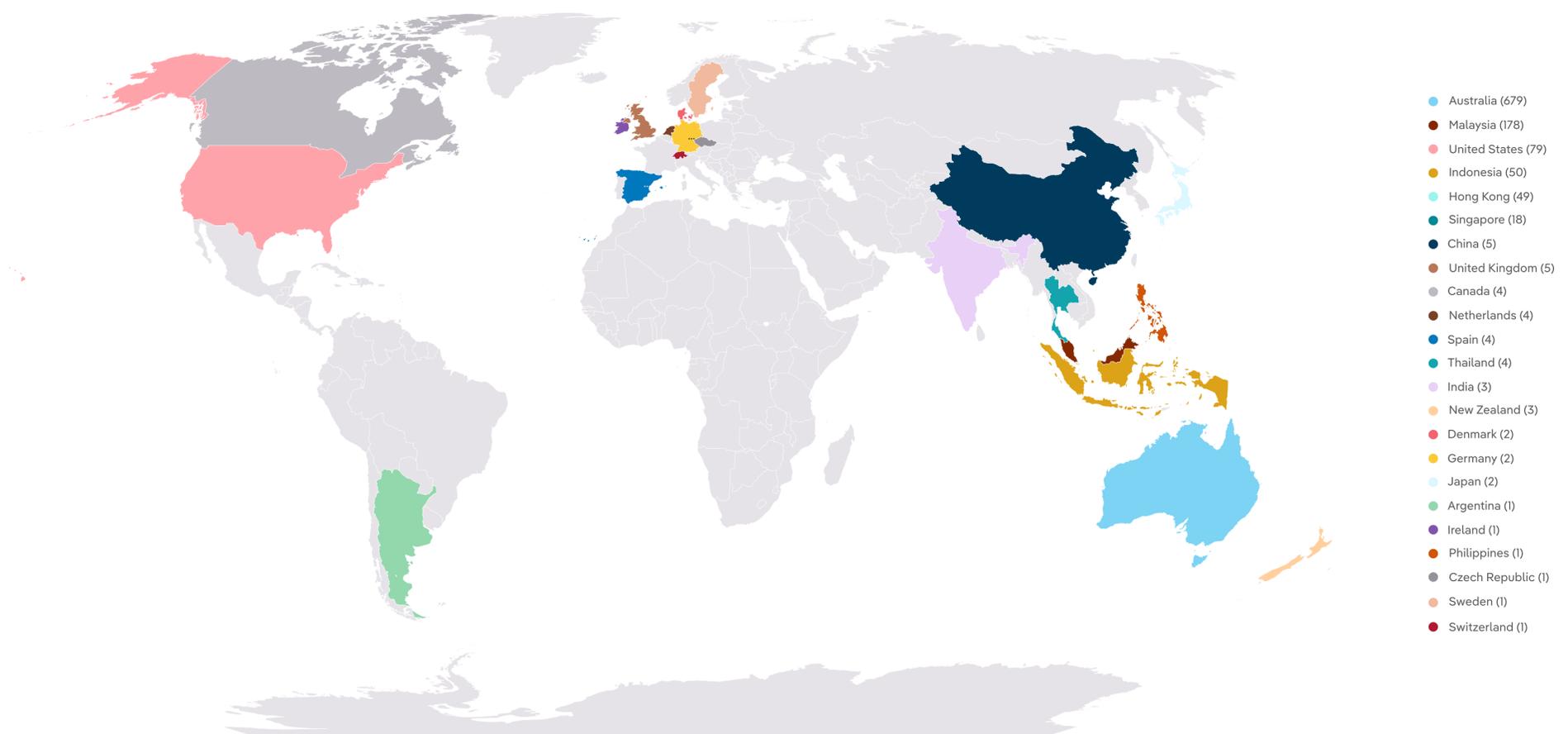
Elara, which became a controlled entity of realestate.com.au from December 2020, operates its own procurement, legal and risk management functions. As at 30 June 2021, Elara and its businesses in India operated independently and had not been integrated with REA Group. Because the Elara business only recently became a controlled entity, its supply chain has been described separately in this statement.

### Overview of REA Group supply chains<sup>4</sup>

Total tier 1 suppliers: 1,108

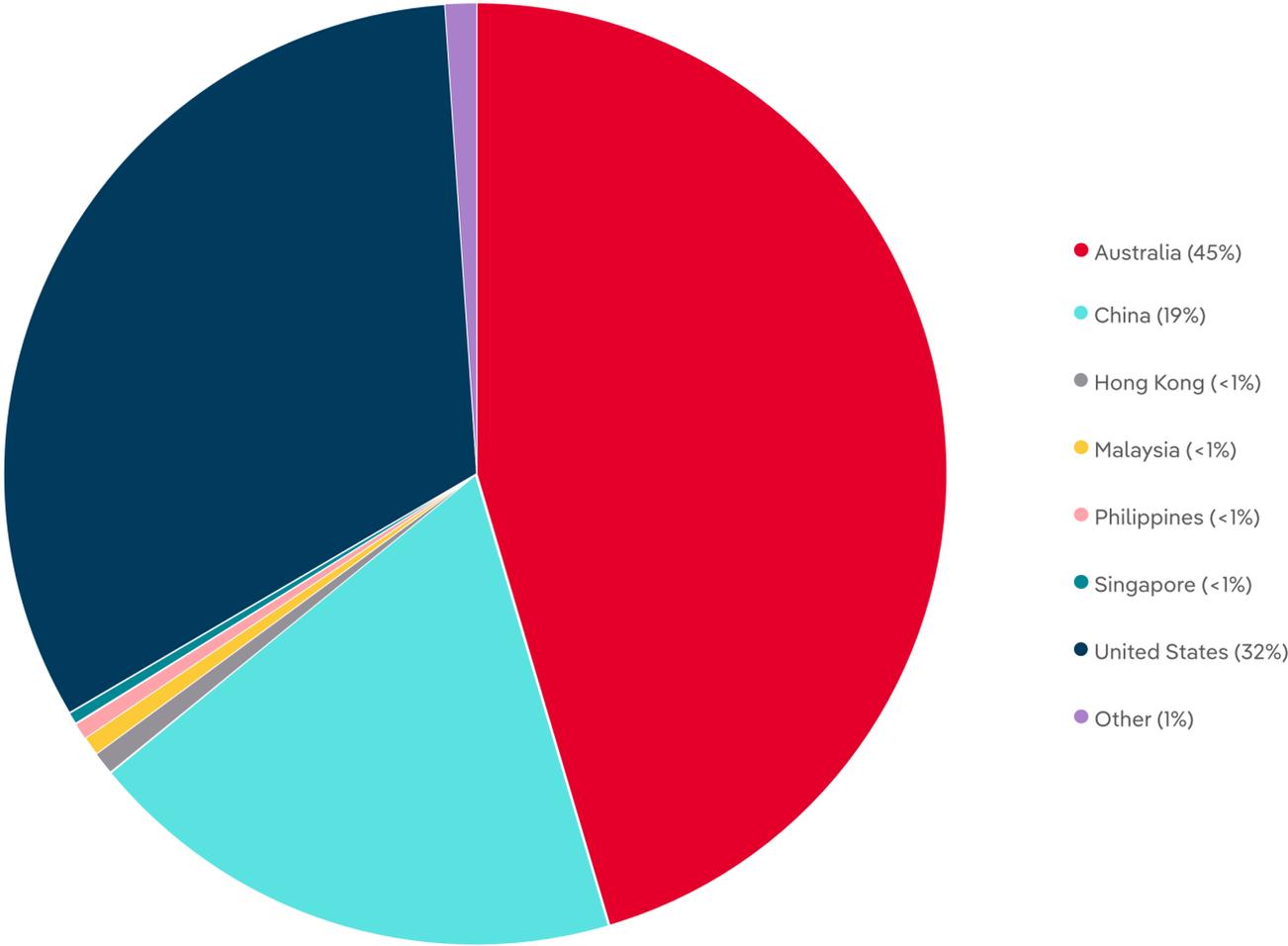
Total FY21 spend: AUD \$152.3m

### Location of Tier 1 Suppliers

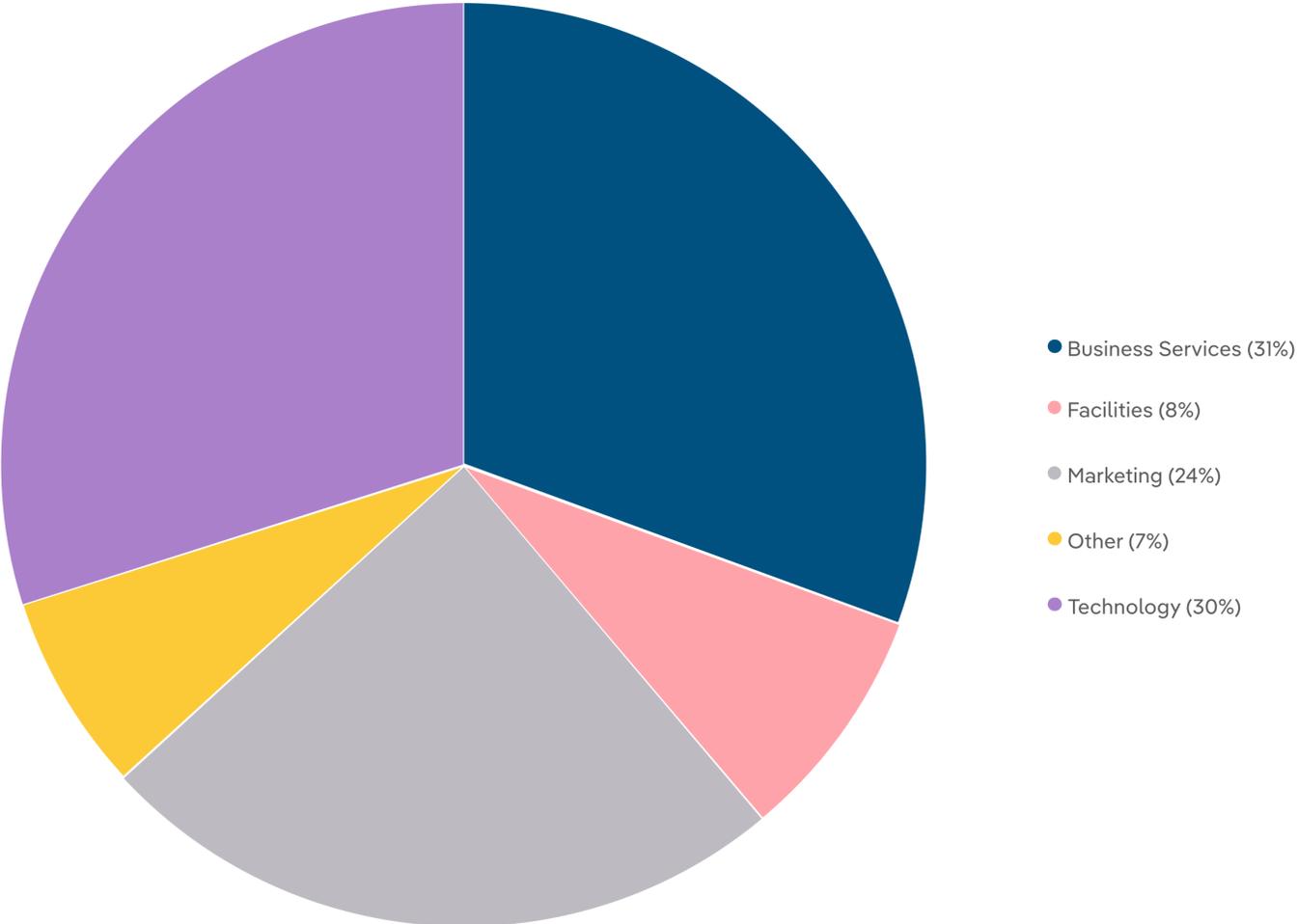


4. REA Group, excluding Elara operations in India.

### Tier 1 Supplier Spend by Country

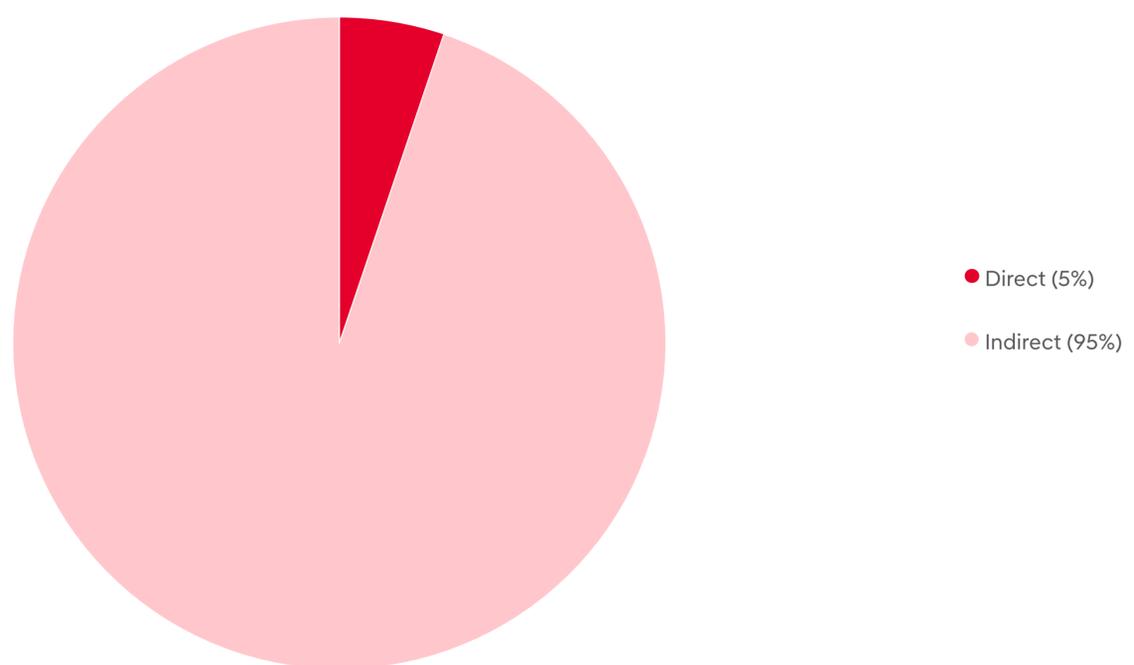


### Spend by Procurement Category



Spend Category	Examples of goods and services	Key sourcing countries
Business services	<ul style="list-style-type: none"> <li>• External contractors</li> <li>• Technology consulting</li> <li>• Accounting, audit and legal services</li> <li>• Administrative support</li> </ul>	Australia, China, Philippines
Technology	<ul style="list-style-type: none"> <li>• Software licences</li> <li>• Cloud infrastructure</li> <li>• Hardware and data</li> <li>• Analytics services</li> </ul>	Australia, United States
Marketing	<ul style="list-style-type: none"> <li>• Media and advertising</li> <li>• Creative agencies</li> <li>• Sponsorships</li> <li>• Events</li> <li>• Merchandise</li> </ul>	Australia, United States
Facilities	<ul style="list-style-type: none"> <li>• Rent</li> <li>• Office fit out</li> <li>• Cleaning and catering</li> </ul>	Australia, Hong Kong, China, Malaysia, Thailand
Other	<ul style="list-style-type: none"> <li>• Staff related expenses</li> </ul>	Australia, Hong Kong, China, Malaysia, Thailand

### Suppliers by direct/indirect procurement



5% of REA Group's suppliers are responsible for 'direct' procurement categories, being the core goods and services that contribute to REA Group's product offerings. On a spend weighted basis, these 'direct' suppliers account for 52% of REA Group's total procurement expenditure.

### Overview of Elara supply chains

Total tier 1 suppliers: 394  
 Total FY21 spend: AUD\$21.5m  
 Supplier spend by country: India (99.3%), United States (<1%), Spain (<1%), Germany (<1%), Australia (<1%).

# Overview of Modern slavery risks

We have carried out a risk assessment of the potential for modern slavery practices within the operations and supply chains of REA Group.

The assessment of modern slavery risks was carried out by representatives from REA Group's central procurement, risk and legal functions, based in Australia.

## Risks in our operations

REA Group is a designer and developer of digital products and software experiences and a provider of mortgage broking services. Due to the nature of REA Group's services, their predominantly online distribution channels and the skilled workers that contribute to them, we consider that the inherent risk of modern slavery practices within our operations is generally low.

## Risks in our supply chains

We have assessed the inherent risk of modern slavery practices in our supply chains, having regard to:

1. the supplier's country of operation;<sup>5</sup>
2. the types of goods or services supplied; and
3. propensity for use of unskilled, transient or migrant labour in the supplier's industry.

These risk factors were identified having regard to third party data sources, such as the Walk Free Global Slavery Index 2018.

Based on the high level risk assessment that was completed, we have determined that the inherent risk of modern slavery practices within REA Group's contracted supplier relationships is generally low. This is because REA Group's expenditure is weighted toward lower risk supplier categories such as technology (software, data and communications), business services and marketing.

REA Group's risk profile is further reduced because a large majority of REA Group's suppliers are based in developed economies with stronger labour laws and lower prevalence of modern slavery practices.

We have identified the following as procurement categories that may carry a higher inherent risk of forced labour, bonded labour or other modern slavery practices:

- **External contractors** – REA Group engages third party consultancies which provide REA Group with specialised software development services from an offshore delivery centre based in Xian, China as well as administrative support services from an office based in Manila, Philippines.

- **Merchandise and branded clothing** - REA Group sources branded clothing for its workers as well as merchandise (pens, notebooks, drink bottles, umbrellas, coffee cups, phone chargers and carry bags) which is distributed to REA Group customers. These goods are typically manufactured in China and may carry elevated modern slavery risks.
- **Cleaning services** – REA Group has contracted cleaning service providers at its offices in Australia and Asia. Those cleaners work from REA Group's offices but REA Group does not otherwise have direct oversight of their employment arrangements.
- **Computer hardware and peripherals** – REA Group purchases laptops, mobile phones and other computer peripherals through resellers based in Australia. These products may include components or minerals sourced from countries with higher prevalence of modern slavery.
- **General offices supplies** – REA Group purchases a range of general office supplies, including coffee, tea, foodstuffs, office furniture, printing materials and stationery which are purchased from generalist retailers. These goods may include materials or components that are sourced from or assembled in developing markets. REA Group has no visibility over these supply chains and limited capacity to conduct due diligence on these procurement categories because they represent a small spend category.

REA Group's geographic footprint has changed significantly over the last 24 months, with the divestment of our Singapore and Indonesian operations in March 2020, the acquisition of a controlling stake in our Indian operations, Elara, in December 2020, the divestment of our Malaysian and Thai operations in August 2021 and the divestment of our Hong Kong operations in November 2021.

Due to the changing footprint and supply chains within our Asian operations and because of the imminent divestment of some operations, REA Group did not undertake an exhaustive review of all Asian suppliers in FY2021. With the consolidation of the business moving forward, REA Group intends to streamline processes for the review of supply chain arrangements within our remaining offshore operations.

5. With emphasis in FY2021 being on suppliers with operations in South East Asia and the subcontinent, Africa and Eastern Europe, which align with higher risk regions under the Walk Free Global Slavery Index 2018.

# Risks that we cause, contribute to or are linked to modern slavery practices through our operations or supply chains

## Risks that we cause modern slavery practices through our operations

We consider the inherent risk that REA Group directly causes forced labour, human trafficking or other modern slavery practices through its operations is low. REA Group's direct workforce in Australia and Asia consists primarily of highly skilled technology workers, product, sales and marketing staff and support services staff.

These employees are predominantly full-time employees who are employed in accordance with local labour laws, paid fairly at market rates and typically work during business hours from an office setting.

We also consider the inherent risk of usage of underage or child labour within REA Group's operations to be low. In particular, due to the specialised nature of the digital products created by REA Group, employment candidates have typically completed tertiary study and significantly exceed the minimum working age.

## Risks that we contribute to modern slavery practices through our operations and supply chains

REA Group acknowledges that in the absence of suitable controls, it could contribute to modern slavery practices through:

- unrealistic pricing or delivery expectations for certain procurement categories (eg. branded merchandise and garments); and
- the usage of outsourced labour in developing markets over which REA Group has less control.

Some of the steps taken to address these risks are set out in the sections Ethical Procurement Training and Management of outsourced labour suppliers.

## Risks that we are linked to modern slavery practices through our operations or supply chains

### Our offshore operations:

While REA Group's overall risk profile is low, it is possible that REA Group could be linked to modern slavery practices through its minority and majority stakes in overseas property advertising portals.

In particular, portals operating in India, Indonesia, Malaysia and Thailand have a higher inherent risk of being linked to modern slavery practices due to less stringent governance than the standards and processes applied in Australia and a higher prevalence of modern slavery practices in these territories.<sup>6</sup>

Due to the largely independent operation of the Indian and Indonesian operations, REA Group did not have direct oversight of the procurement decisions and some facets of the governance structures of these businesses during FY2021. REA Group is in the process of uplifting the governance processes and policies of the Elara business in India, which became a controlled entity of REA Group during FY2021.

REA Group retained full operational control of iproperty.com.my in Malaysia and thinkofliving.com and prakard.com in Thailand during FY2021 and these businesses retained the policy settings and controls which are described later in this statement.

Notwithstanding that they operate in higher risk jurisdictions, we consider that the risk within these operations is inherently low because their workforces consist of skilled professionals who work in an office setting and support the delivery of digital products, websites and mobile software applications.

Further, the procurement categories of these businesses are predominantly lower risk technology (software, data and communications), business services and facilities categories.

### Our indirect workforce:

As part of its operations, REA Group has an indirect workforce consisting of highly skilled technology contractors based in Xian, China and administrative contractors based in Manila, Philippines. These contractors are engaged through consultancy companies based in Australia, with service delivery taking place from offshore offices of these consultancies.

Given that REA Group does not directly employ these workers, set their working conditions, or manage the offshore delivery centres, there is a higher inherent risk of modern slavery amongst this workforce. Both of these suppliers were screened during FY2021 using the measures described in this statement (see Supplier Due Diligence) and the screening revealed no issues of concern.

# Actions taken by REA Group to assess & address modern slavery risks, including due diligence & remediation processes

## Assessing modern slavery risks within REA Group's supply chains

### **Supplier risk assessments:**

During FY2021, a high level risk assessment of REA Group's suppliers<sup>7</sup> was conducted based on the following criteria:

1. the supplier's country of operation;
2. the types of goods or services supplied; and
3. propensity for use of unskilled, transient or migrant labour in the supplier's industry.

These criteria were used to identify a shortlist of suppliers which had an elevated inherent risk of modern slavery practices. REA Group shortlisted approximately 1% of its tier one suppliers that met one or more of the identified risk factors.

The suppliers flagged under the risk assessment included organisations with operations or supply chains in Australia, China, India, the Philippines and Romania, with services provided by those suppliers including cleaning services, administrative support, software development and consulting, adtech support, market research and merchandise sourcing.

REA Group will be continuing to refine these criteria to ensure that they reflect the changing geographic footprint of REA Group's global operations.

### **Supplier due diligence for higher risk suppliers:**

REA Group has adopted further due diligence measures for suppliers assessed as having a higher inherent modern slavery risk.

Based on the risk assessment criteria above, a Supplier Assessment Questionnaire was sent to approximately 1% of REA Group's tier one suppliers.

The Questionnaire comprises 20 questions relating to the policies and procedures of the supplier, their supply chain visibility, modern slavery responsibility, training programs, response processes and employment conditions. The Questionnaire also requires explicit acceptance of the REA Group Supplier Code of Conduct and disclosure of any instances of non-compliance with the Code.

The completed Supplier Assessment Questionnaires were reviewed by members of REA Group's legal and risk teams. The review did not reveal any indicators or instances of modern slavery practices within the shortlisted group of suppliers. However, the process did result in several suppliers implementing new modern slavery policies.

REA Group takes a flexible approach to reviewing responses to questionnaires, having regard to the supplier's industry and size. REA Group looks for indicators of poor governance or exploitative labour practices across all questionnaire responses but does not expect small suppliers to have the same systems and frameworks as a large supplier. For example, we would not necessarily expect small suppliers to have a formal human rights or modern slavery policy or specific staff training programmes for modern slavery.

However, REA Group would expect that all suppliers have processes to check that they are not using child labour, that they are not retaining workers' documentation and that they provide their employees with pay slips and a contract of employment in a language they understand. For suppliers of goods, we would also expect there to be a level of visibility around the sourcing of products and a pathway toward increasing visibility of supply chains, including through due diligence programs.

REA Group will continue to expand its supplier due diligence program in FY2022, including by adopting formal screening criteria which can be consistently applied across all REA Group entities.

## Addressing modern slavery risks within REA Group's supply chains

### **Supplier Code of Conduct<sup>8</sup>**

REA Group's [Supplier Code of Conduct](#) sets out the minimum standards required of suppliers in the areas of workers' rights and human rights, anti-bribery and anti-corruption laws and other laws in relation to business integrity, privacy, health and safety, and environmental considerations.

Suppliers must also have adequate policies and procedures in place to monitor compliance with these laws and must ensure that any authorised sub-contractors also comply with these minimum standards.

All new suppliers are sent the Supplier Code of Conduct as part of supplier onboarding. REA Group recommunicated a copy of the Supplier Code of Conduct to all REA Group suppliers by an email communication sent in June 2021.

In FY2021, REA Group began to embed compliance with the Supplier Code of Conduct, and related audit obligations, into the contracts of certain suppliers that were deemed to carry an elevated risk of modern slavery practices based on our risk assessment criteria.

7. This risk assessment was focused primarily on (i) suppliers of REA Group Australia, (ii) joint suppliers of REA Group Australia and Asia. It did not include a risk assessment of Elara's suppliers and was not a complete review of all REA Asia suppliers. The risk categories were determined by reference to the Walk Free Modern Slavery Index 2018.

8. The Supplier Code of Conduct applies to suppliers of all REA Group entities, except Elara subsidiaries which will be adopting their own Supplier Code of Conduct.

## Case Study

In FY2021, REA Group commenced negotiations with a new supplier for the sourcing and supply of branded merchandise, including pens, notebooks, drink bottles, umbrellas, coffee cups, phone chargers and carry bags.

Prior to the supplier being approved for onboarding, they were required to complete REA Group's Supplier Assessment Questionnaire. The questionnaire response was reviewed by a member of the REA Group legal team and all responses and internal controls disclosed by the supplier were deemed satisfactory.

As part of the approval of the supplier, custom amendments were included in the supplier's contract, including obligations for the supplier to comply with REA Group's Supplier Code of Conduct and for its suppliers and sub-contractors to comply with the same standards, a right of termination in the event of breach of REA Group's Supplier Code of Conduct, a supplier warranty that it would conduct its own due diligence of its suppliers and annual audit rights.

### Ethical Procurement Training

In FY2021, REA Group's central procurement team all completed ethical procurement and supply training provided online by the Chartered Institute of Procurement & Supply.

This important step was taken to ensure that REA Group procurement personnel can recognise indicators of modern slavery practices and that REA Group can address the risk that REA Group could contribute to modern slavery practices through unrealistic expectations about the price or delivery timeframes to be met by suppliers.

### Management of outsourced labour suppliers

REA Group has a number of practices which provide oversight of day to day working conditions for outsourced workers:

- realestate.com.au's Offshore Delivery Manager visits the Xian delivery centre operated by its outsourced consultants, on a quarterly basis. Other REA Group procurement and engineering staff visit the Xian delivery centre on an ad-hoc basis. In person visits to the Xian delivery centre have been placed on hold since the outbreak of COVID-19;
- realestate.com.au has open video links with the Xian delivery centre on a daily basis as well as regular ad-hoc video conferences between Australian and Xian software developers;

- Smartline mortgage brokers have direct 1:1 relationships with outsourced administrative support staff in the Philippines and communicate on a daily basis; and
- REA Group's expenditure with the outsourced providers is in line with market rates.

REA Group will assess the appropriateness of future onsite audits at the offices of its offshore labour suppliers. Onsite audits were not possible during FY2021 due to the travel restrictions imposed as a result of the COVID-19 pandemic.

## Addressing modern slavery risks within our operations

### REA Group Policy Framework

REA Group has a detailed governance and policy framework which significantly reduces the risk of modern slavery practices within REA Group's direct workforce and operations. This includes:

- the REA Group Code of Conduct, Employment Handbook and Equality in Employment Policy which together set out the behavioural standards required of all REA Group employees. The Code of Conduct also applies to contractors, consultants and visitors working for REA Group;
- the REA Group Risk Management Policy which sets out the framework for identifying and managing strategic, operational, compliance and regulatory risk across REA Group's businesses;
- the REA Group Procurement Policy which set out the process for engaging and onboarding new suppliers, including relevant management approvals;
- REA Group's Contract Approval Procedure which requires a business lead to obtain approvals from legal, risk, procurement and finance business partners before a new contract can be signed by management. This process assists in surfacing relevant key supplier risks to management, prior to a new supplier being onboarded;
- the Permanent Residency at REA Group Policy which sets out the circumstances in which REA Group will sponsor employees for permanent residency;
- REA Group's anti bribery and corruption program and its related policy; Doing Business Ethically and with Integrity; and
- REA Group's Whistleblower Policy.

This policy framework assists in embedding a strong culture of compliance across REA Group's operations. REA Group's policies and processes are periodically reviewed to ensure they remain fit for purpose.

### **Employee onboarding controls**

REA Group has controls which reduce the risk that we could inadvertently employ individuals that are under the minimum working age.

In REA Group's operations, an underage candidate would be identified through our new employee screening process, including through the interview stage, completion of tax authority forms or through photo identification provided by candidates.

In India, Elara's Human Resources Information System does not allow for the creation of profiles or release of employment offers to individuals aged under 18 years.

### **Assessing modern slavery risks within REA Group investments**

In FY2021, REA Group increased its shareholding in Elara which operates housing.com, proptiger.com and makaan.com in India. REA Group now holds a 60% majority interest in Elara.

Given that Elara operates in the developing Indian market, it carries a higher inherent risk of modern slavery practices than REA Group's Australian operations. During FY2021, REA Group carried out preliminary scoping work for modern slavery risks within Elara's operations. This consisted of Elara completing REA Group's Supplier Assessment Questionnaire for high risk suppliers.

The questionnaire did not reveal any indicators of modern slavery practices. However, the questionnaire did reveal opportunities to enhance governance through adoption of REA Group's modern slavery risk management processes and policies.

### **Addressing modern slavery risks within REA Group investments**

As part of the ongoing integration of the Elara business in India, Elara will be adopting localised versions of REA Group's Supplier Code of Conduct, modern slavery risk assessment criteria, Supplier Assessment Questionnaire and a new Modern Slavery Policy.

Elara already has its own Whistleblower Policy and Safecall reporting service as a mechanism for reporting of labour violations or modern slavery practices. Elara procurement personnel will also be completing ethical procurement and supply training.

## **Remediation processes**

### **Whistleblower Policy**

REA Group's Whistleblower Policy allows for anonymous complaints to be made by REA Group employees, officers, consultants, sub-contractors and suppliers and their employees in relation to conduct that is illegal, fraudulent, corrupt, unethical, or that entails unsafe work practices, abuse of authority or other acts that are inconsistent with REA Group values and behaviours, including modern slavery practices such as people trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment and child labour. The policy is published in English, Chinese and Thai.

Elara retains its own Whistleblower policy covering the operations of the Indian businesses housing.com, proptiger.com and makaan.com.

Complaints can be made to the REA Group Executive Leadership Team, Chief Risk Officer or anonymously to the Chair of the Audit, Risk and Compliance Committee, via report to the independently operated Safecall whistleblower hotline, which is available in Australia, Hong Kong, Malaysia and Thailand. Reports outside these regions can be made online at <https://www.safecall.co.uk/report/>. REA Group has received no complaints concerning modern slavery risks, through its whistleblower service.

The REA Group Whistleblower Policy and Safecall whistleblower hotline were brought to the attention of high risk suppliers through the Supplier Assessment Questionnaire as well as via an email communication sent to all REA Group suppliers in June 2021. REA Group has not received any reports of modern slavery risks or breaches of the Supplier Code of Conduct, via its whistleblower channels.

### **Supplier feedback**

REA Group has made available a contact point for concerns or feedback concerning its Supplier Code of Conduct through its central procurement team. REA Group has received no notifications from any supplier in relation to their inability or refusal to comply with the Supplier Code of Conduct, since it was implemented in July 2019.

### **Responding to reports or indicators of modern slavery**

REA Group will promptly investigate any reports through the above channels which relate to potential violations of labour laws or reports of forced labour, child labour or other modern slavery practices.

If REA Group's supplier due diligence reveals process deficiencies or areas of concern in a supplier's practices, we will work proactively with the supplier to improve its governance and practices. If areas of concern are not remedied, REA Group will reassess its future relationship with the relevant supplier and outcomes may include suspension or termination of supplier relationships.

# Assessing the effectiveness of our actions

In preparing this Statement, REA Group formed a modern slavery governance group comprising representatives from its shared procurement, risk, legal and sustainability functions.

The modern slavery governance group will continue to meet on a quarterly basis in order to monitor the effectiveness of our modern slavery risk management processes, including by reviewing feedback from REA Group’s internal audit team and the outcome of any future onsite audits of key suppliers.

From FY2022, REA Group will also assess the effectiveness of its modern slavery governance processes based on the following KPIs. These will be measured against baseline metrics from FY2021.

## Key performance indicator

Training	The percentage of REA Group’s central procurement team that have received ethical procurement and supply training.
Supplier engagement	<ul style="list-style-type: none"> <li>The number of Supplier Assessment Questionnaires issued and completed each year; and</li> <li>The percentage of Supplier Assessment Questionnaires with concerns flagged.</li> </ul>
Grievances	The number of whistleblower complaints related to modern slavery risks received each year.
Remediation	The number of remediation actions taken with suppliers.

## Future measures

REA Group has identified the following as intended actions during FY2022:

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

# Consultation between REA Ltd, realestate.com.au and their subsidiaries

In preparing this Statement, REA Group’s modern slavery governance group consulted with procurement, risk and legal representatives from the Elara business in India and the procurement and risk representatives for REA Group’s Asian operations.

This included video conferences with responsible personnel in relevant REA Group business units, which was supplemented with written feedback.

REA Group’s modern slavery governance group has also consulted with the Elara business in relation to the rollout of REA Group policies and procedures, as part of the integration of the Elara business.

## Other relevant matters

### COVID-19 impacts

The COVID-19 pandemic and associated government travel restrictions have limited the ability of REA Group personnel to visit offshore delivery centres in Xian, China and Manila, Philippines. This is an important control in REA Group's oversight of the working conditions of its indirect workforce. REA Group intends to recommence site visits to these locations once travel restrictions and health conditions permit.

REA Group personnel have worked remotely since March 2020, with limited periods of office work between government lockdowns. REA Group has implemented a number of initiatives to assist its employees to manage the impacts of a prolonged period of work from home arrangements.

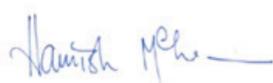
These include implementing an employee wellbeing program, meeting free and Zoom free times to address employee fatigue, mental health awareness initiatives and wellness profiling by an external consultancy to track any areas of concern amongst REA Group's workforce.

### Modern Slavery Policy

REA Group adopted a new Modern Slavery Policy on 14 December 2021 which will also be rolled out to the Elara business during FY2022.

REA Group is committed to identifying, assessing and addressing risks of modern slavery practices in its operations and supply chains. We will be continually monitoring the effectiveness of the steps set out in this Statement and improving practices to mitigate modern slavery risks.

The board of directors of REA Group Ltd and the board of directors of realestate.com.au Pty Limited have each reviewed and approved this Statement for the year ended 30 June 2021 on 17 December 2021.



**Hamish McLennan**  
Chairman  
REA Group Ltd

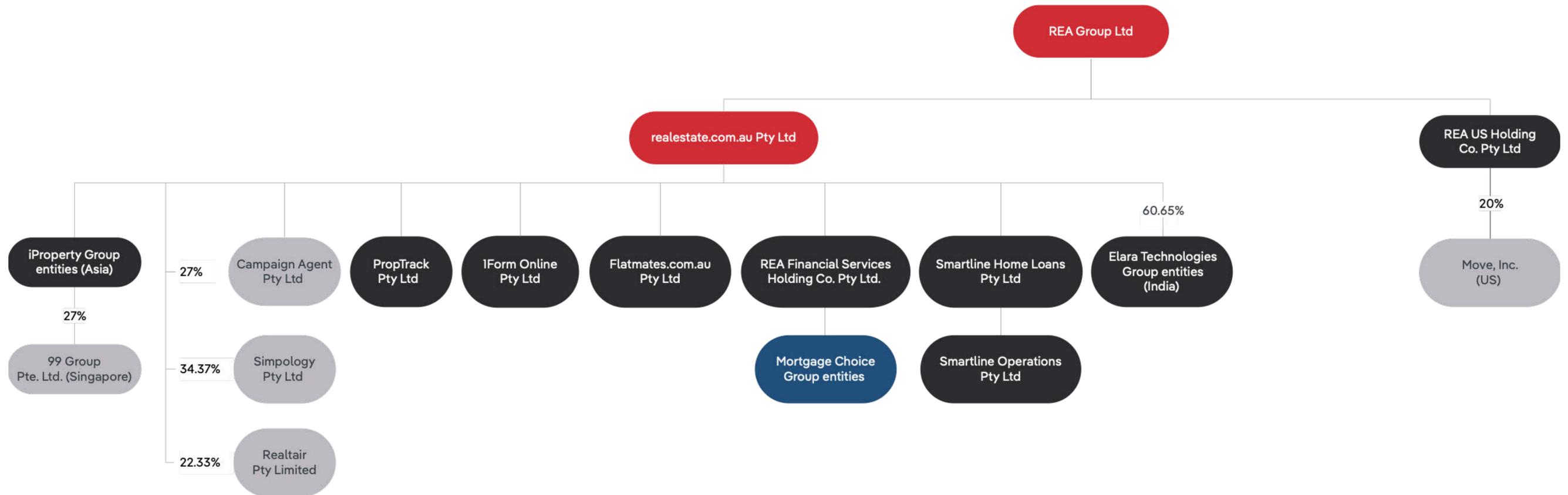


**Owen Wilson**  
CEO and Executive Director  
REA Group Ltd and  
realestate.com.au Pty Limited

## Annexure – REA Group subsidiaries

Name of entity	Country of incorporation	Equity Holding 2021 %	Equity Holding 2020 %
REA US Holding Co. Pty Ltd	Australia	100	100
realestate.com.au Pty Limited	Australia	100	100
1Form Online Pty Ltd	Australia	100	100
Austin Rollco Pty Limited <sup>1</sup>	Australia	–	100
Flatmates.com.au Pty Ltd	Australia	100	100
REA Austin Pty Ltd <sup>1</sup>	Australia	–	100
PropTrack Pty Ltd (previously Hometrack Australia Pty Limited)	Australia	100	100
realestate.com.au Home Loans Mortgage Broking Pty Ltd	Australia	100	100
NOVII Pty Ltd	Australia	56.2	56.2
Ozhomevalue Pty Ltd <sup>2</sup>	Australia	56.2	56.2
REA Financial Services Holding Co. Pty Ltd <sup>3</sup>	Australia	100	–
Mortgage Choice Limited <sup>4</sup>	Australia	100	–
FinChoice Pty Limited <sup>4</sup>	Australia	100	–
Help Me Choose Pty Limited <sup>4</sup>	Australia	100	–
REA Asia Holding Co. Pty Ltd <sup>5</sup>	Australia	100	–
Smartline Home Loans Pty Ltd	Australia	100	100
Smartline Operations Pty Limited	Australia	100	100
Austin Bidco Pty Ltd	Australia	100	100
iProperty Group Pty Ltd	Australia	100	100
iProperty Group Asia Pte. Ltd	Singapore	100	100
IPGA Management Services Sdn Bhd	Malaysia	100	100
iProperty.com Events Sdn Bhd	Malaysia	100	100
iProperty.com Malaysia Sdn Bhd	Malaysia	100	100
Brickz Research Sdn Bhd	Malaysia	100	100
Think iProperty Sdn Bhd	Malaysia	100	100
REA Hong Kong Management Co Limited	Hong Kong	100	100
GoHome HK Co Limited	Hong Kong	100	100
Finance18.com Limited	Hong Kong	–	100
House18.com Services Limited <sup>6</sup>	Hong Kong	–	100
SMART Expo Limited	Hong Kong	100	100
Big Sea International Limited	Macau	100	100
GoHome Macau Co Ltd	Macau	100	100
iProperty (Thailand) Co., Ltd <sup>7</sup>	Thailand	100	100
Prakard IPP Co., Ltd <sup>8</sup>	Thailand	100	100
Kid Ruang Yu Co., Ltd <sup>9</sup>	Thailand	100	100
Flagship Studio Co., Ltd <sup>10</sup>	Thailand	–	100
Prakard.com (Hong Kong) Limited <sup>11</sup>	Hong Kong	–	100
REA Group Hong Kong Ltd	Hong Kong	100	100
Primedia Limited <sup>11</sup>	Hong Kong	–	100
REA HK Co Limited	Hong Kong	100	100
REA Group Consulting (Shanghai) Co. Limited	China	100	100
Elara Technologies Pte. Ltd. <sup>12</sup>	Singapore	60.7	13.5
Locon Solutions Private Limited <sup>13</sup>	India	60.7	–
IREF Solutions Private Limited <sup>13</sup>	India	60.7	–
Realty Business Intelligence Private Limited <sup>13</sup>	India	60.7	–
Sadanika Solutions Private Limited <sup>13</sup>	India	60.7	–
PropTiger Marketing Services Private Limited <sup>13</sup>	India	60.7	–
Aarde Technosoft Private Limited <sup>13</sup>	India	60.7	–
Makaan.com Private Limited <sup>13</sup>	India	60.7	–
Oku Tech Private Limited <sup>14</sup>	India	60.7	–
<b>Associates and joint ventures:</b>			
Move, Inc. <sup>15</sup>	United States	20	20
Managed Platforms Pty Ltd <sup>16</sup>	Australia	27.6	27.8
99 Group Pte. Ltd <sup>17</sup>	Singapore	27	27
ScaleUp Media Fund 2.0 Pty Limited <sup>18</sup>	Australia	16.7	16.7
Realtair Pty Limited <sup>19</sup>	Australia	22.3	–
Campaign Agent Pty Ltd <sup>20</sup>	Australia	27	–
Simpology Pty Limited <sup>21</sup>	Australia	34.4	–

# Annexure – REA Group simplified corporate structure



- Entities making a joint statement under Modern Slavery Act 2018 (Cth)
- Entities covered by the REA Group Ltd and realestate.com.au Pty Limited joint statement under Modern Slavery Act 2018 (Cth)
- Entities in which the REA Group holds a minority interest (as at 30 June 2021)
- Entities covered by the Modern Slavery Statement of Mortgage Choice Group