



MODERN SLAVERY STATEMENT

Reporting Period
1 July 2021 - 30 June 2022



Contents

EXECUTIVE SUMMARY

MUTUAL MARKETPLACE'S POSITION

MANDATORY CRITERIA

01. Mutual Marketplace's Position

02. Describe the reporting entity's structure, operations, and supply chains

- » Mutual Marketplace provides the following services
- » More information about the breadth of our Category Management

03. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns and controls

- » As reported by Walk Free, this is the Global Slavery Index heat map and country ratings
- » Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes
- » Describe how the reporting entity assesses the effectiveness of these actions
- » Initial Risk Assessment
 - Figure 1: Classification of Mutual Marketplace's Tier 1 Supply Chain
- » Ongoing Risk Management
 - Effectiveness Framework

POLICY AND SUPPLIER CONTRACTS REVIEW

INTERNAL EDUCATION AND TRAINING

NEXT STEPS FOR MODERN SLAVERY RISK ASSESSMENT AND REMEDIATION

CERTIFICATION AND STATEMENT OF CONFORM

Executive Summary

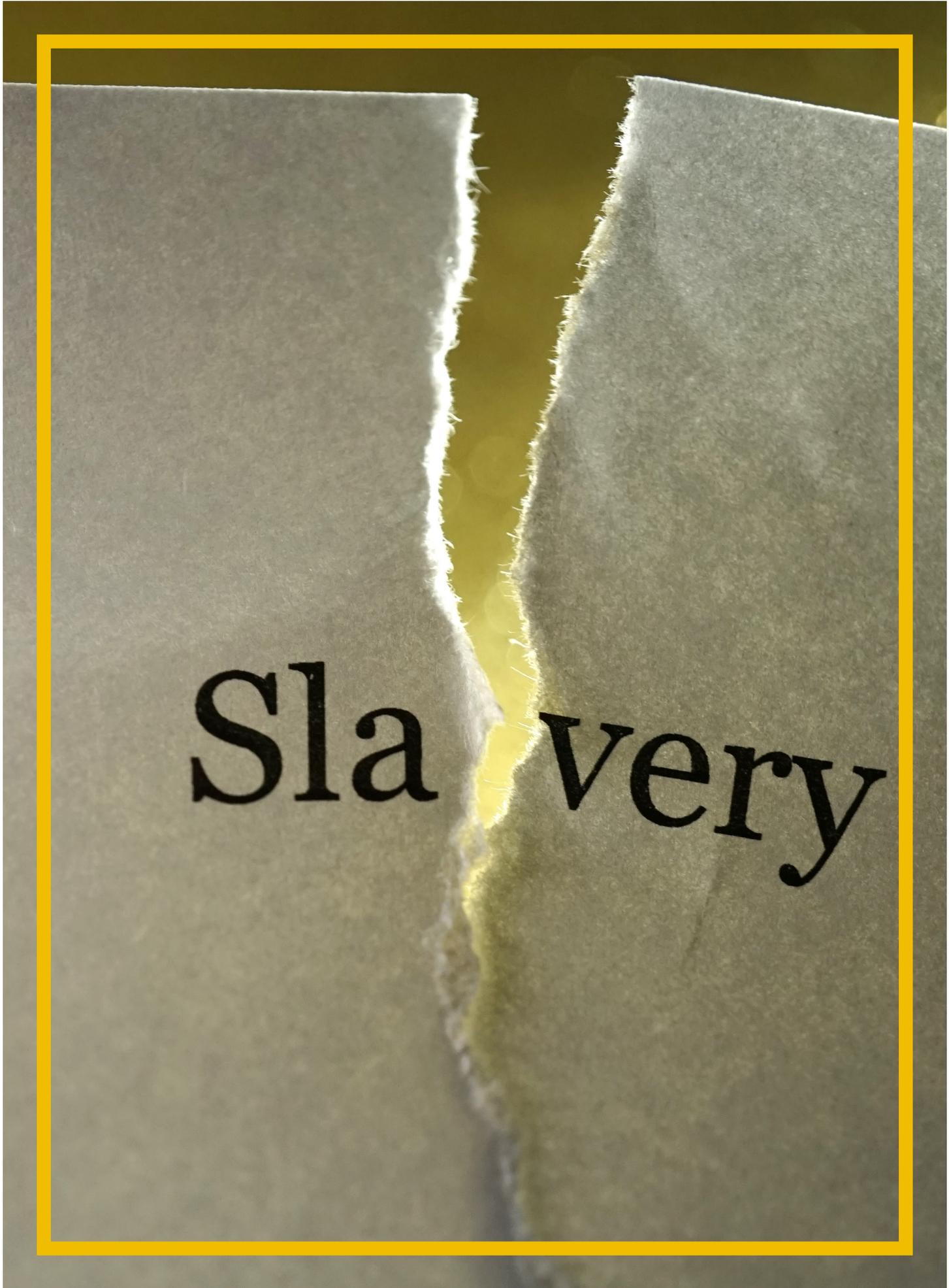
01. This Modern Slavery and Human Trafficking Statement (Statement) is made pursuant to the Modern Slavery Act 2018 (Cth) (the Act) by Mutual Marketplace Pty Ltd ABN 35 615 297 820 (Mutual Marketplace) in respect of Mutual Marketplace and its 'reporting entities' as defined in the Act ("Mutual Marketplace Group" or "the Group") as of 30 June 2022.
02. Mutual Marketplace falls within the scope of a reporting entity under the Act, being an Australian entity with a minimum annual consolidated revenue of \$100 million and must publish annually a statement to the Modern Slavery Statement Register disclosing risks of modern slavery in their supply chains and actions to address those risks.
03. This statement has been prepared to meet the following applicable mandatory requirements of the Act:

Mandatory criteria

- 3.1. Identify the reporting entity.
- 3.2. Describe the reporting entity's structure, operations and supply chains.
- 3.3. Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities it owns or controls.
- 3.4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.
- 3.5. Describe how the reporting entity assesses the effectiveness of these actions.
- 3.6. Any other information that the reporting entity, or the entity giving the statement, considers relevant.

Mutual Marketplace's Position

04. Mutual Marketplace accepts that, like all global businesses of a certain scale, the incidence of modern slavery deep within its supply chains is likely an unfortunate reality, rather than some theoretical notion.
05. Mutual Marketplace is committed to a long-term effort to diminish modern slavery from its supply chains and operations. To that end, we have engaged and worked closely with, subject matter experts on modern slavery over the course of 2019-2022. We consider this to be an important component of our broader corporate social responsibility and human rights obligations.
06. Mutual Marketplace recognises that the efforts and measures defined in this Statement are the initial recognized phases, since the introduction of the Act, in its targeted efforts to carry out uniform and evidence-based modern slavery remediation. What is contained in this Statement is not put forward as the attainment of an end goal in itself but rather a roadmap to build upon the encouraging early steps that are underway.
07. In addition to meeting the specific legal reporting requirements under the Act, this Statement sets out Mutual Marketplace's methodology, key findings and planned framework for future action during upcoming reporting periods in relation to modern slavery risk identification and remediation.



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Mandatory Criteria

Mandatory criteria

1- Identify the reporting entity

08. Mutual Marketplace Pty Ltd ABN 35 615 297 820 / ACN 615 297 820 is the reporting entity.

Mandatory criteria

2- Describe the reporting entity's structure, operations, and supply chains

09. Structure:

- 9.1. Mutual Marketplace is an Australian Proprietary Company, 50% owned by Credit Union Australia Ltd (trading as Great Southern Bank) and 50% by Australian Central Credit Union Ltd (trading as People's Choice).
- 9.2. We have 2 subsidiaries, Mutual Marketplace Property Pty Ltd and Mutual Marketplace Legal Pty Ltd. Both subsidiaries are 100% controlled by Mutual Marketplace Pty Ltd and are based in Australia. Mutual Marketplace Property Pty Ltd manages Australian Property Leases and Mutual Marketplace Legal is an Independent Legal Practice.
- 9.3. The reporting entity's registered office is:
- Level 6, Suite 6A, 300 George St
Brisbane QLD 4000
- 9.4. The approximate number of workers employed by Mutual Marketplace Pty Ltd, and any related entities is 26.

10. Operations:

- 10.1. Mutual Marketplace is a provider of procurement, supplier risk services, corporate card management, shared service and accounts payable services for the Australian credit union industry. The entities operations are located exclusively in Australia.
- 10.2. Mutual Marketplace employs 26 people across two offices in Brisbane and Adelaide.
- 10.3. Mutual Marketplace enters into contracts with our suppliers. These are generally in the form of master services agreements, statements of work and purchase order terms and conditions. These relationships range from short-term and changeable to more stable longer-term relationships.

Mutual Marketplace provides the following services:



ACCOUNTS PAYABLE

- Invoice Processing
- Corporate Credit Card Solution
- Accounts Payable Outsourcing
- Payroll Outsourcing



SUPPLIER MANAGEMENT

- Procurement
- RFP, RFQ, RFx Services
- Aggregation Opportunities
- Tiered and Scale Discounts



RISK MANAGEMENT

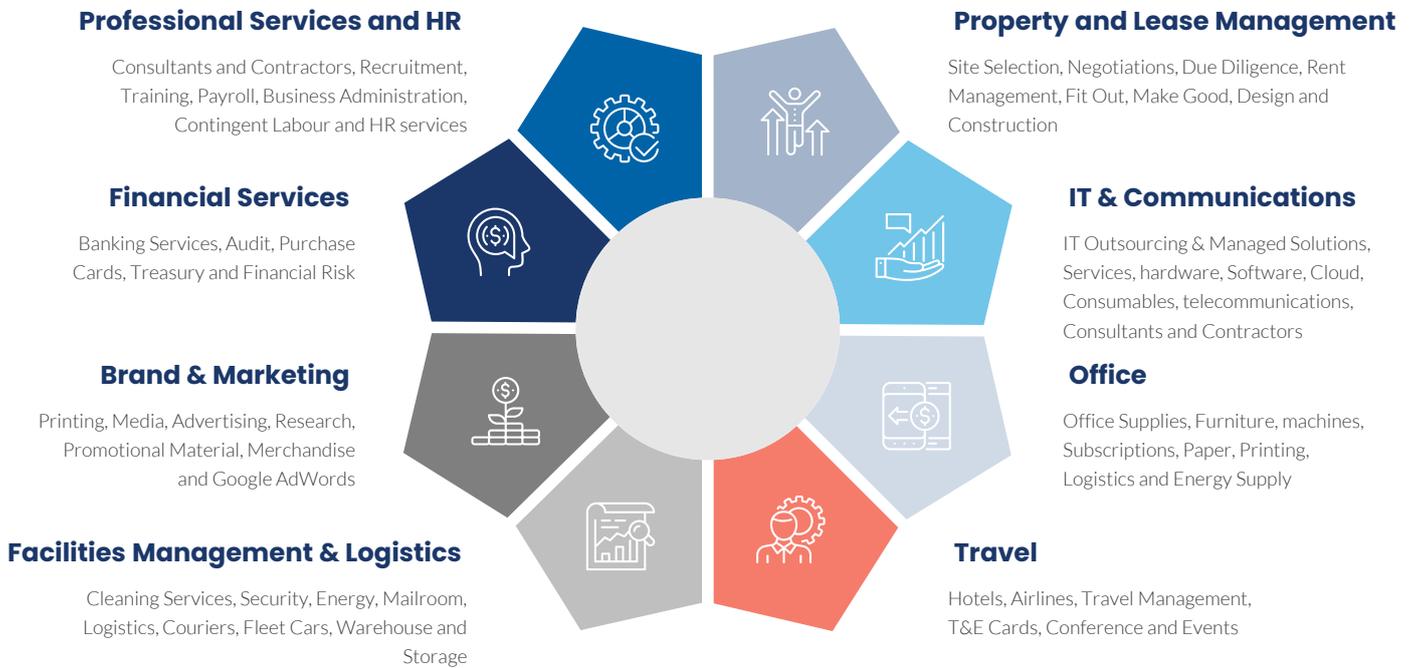
- Due Diligence
- Media Monitoring
- CPS220 Compliance
- Supplier Risk Management
- Modern Slavery Risk Assessment



LEGAL

- Legal Services
- Customer Support Service
- Full Suite of Precedent Contracts
- Compliance with APRA, ATO and ASIC
- In-House as a Service – Access to ADI Experienced Legal Support

More information about the breadth of our Category Management:



11. Supply Chains:

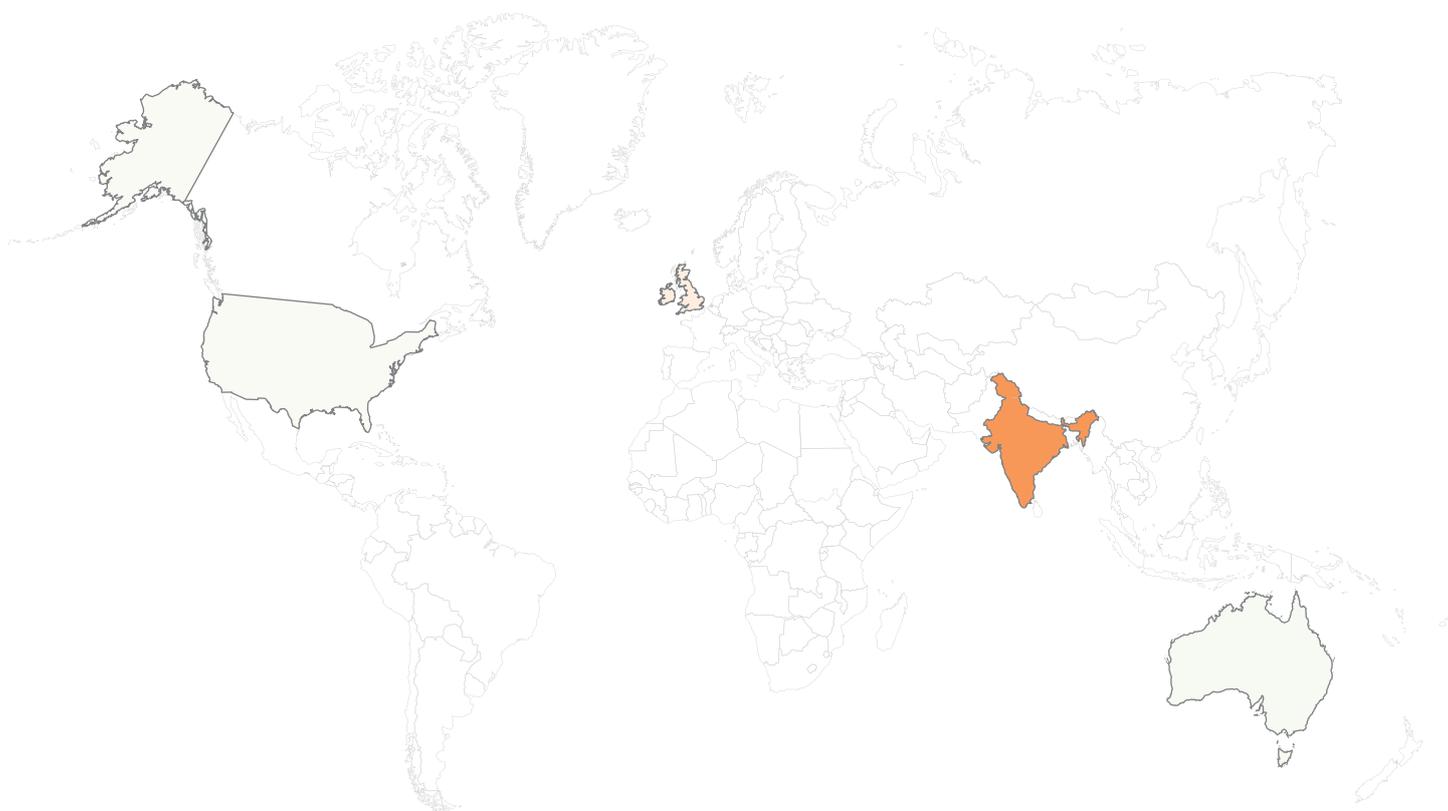
- 11.1. Over 90% of suppliers engaged by Mutual Marketplace are based in Australia. In addition to this, Mutual Marketplace engages with suppliers located in the United States, Europe, India, New Zealand, Canada and South Africa.
- 11.2. Mutual Marketplace predominantly procures goods and services for its customers that relate to banking and finance services such as IT and communication services, IT and communication hardware, contractors and consultants, office supplies, uniforms, merchandise, advertising and promotional items, building maintenance and fit out, cleaning services, physical security services, and travel services.

Mandatory criteria

3- Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns and controls

12. All employees of Mutual Marketplace are employed directly. Most employees are on permanent contracts. As this significantly reduces the risk of modern slavery our assessment considers risks linked to our supplier contracts. Our analysis indicates the highest risk of modern slavery in our supply chain is through the sourcing of our information technology and communications in India.

As reported by Walk Free, this is the Global Slavery Index heat map and country ratings



Source: The Minderoo Foundation Pty Ltd, 2018 - <https://www.globalslaveryindex.org/2018/data/maps/#prevalence>

Based on suppliers servicing MM and our customers, this is how they rate on the global slavery index. These countries referenced hold over a \$1m in procurement spend for MM.

PREVALENCE

Low  High

	INDIA	AUSTRALIA	IRELAND	UNITED KINGDOM	UNITED STATES
Population	1,309,053,980	23,799,556	4,700,107	65,397,080	319,929,162
GDP(PPP)	\$6,583	\$46,790	\$71,405	\$43,081	\$57,638
Prevalence Index Rank	53/167	163/167	147/167	132/167	158/167
Government Response Rating	B	BBB	BB	BBB	BBB
Estimated Number Living in Modern Slavery	7,989,000	15,000	8,000	136,000	403,000
Estimated Proportion Living in Modern Slavery	6.10/1000	0.65/1000	1.67/1000	2.08/1000	1.26/1000
Vulnerability to Modern Slavery	55.49/100	4.27/100	10.35/100	11.13/100	15.88/100

13. Through our risk assessment process, Mutual Marketplace has identified the following forms of modern slavery that are at the greatest risk of being in our supply chain:

13.1. Debt bondage

Debt bonded labour occurs when a person is forced to work to repay a debt or other obligation.

13.2. Deceptive recruiting for labour or services

Deceptive recruiting for labour or services occurs in situations where the victim is deceived about whether they will be exploited through a type of modern slavery.

13.3. Forced labour

Forced labour occurs when workers are not compensated at fair market rates. Any type of labour can become forced labour such as indentured labour, prison labour, child labour and labour that forces hazardous conditions on workers.

Whilst the risks to MM for these types of Modern Slavery is low domestically, due to the volume of spend going to India and the heightened risk within that country it increases MM's risk exposure. What will help manage and mitigate this risk in FY23 is our partnership with FRDM.



Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

14. Mutual Marketplace identifies suppliers with modern slavery risks through Ariba Supplier Lifecycle and Performance and Risk modules. The SLP and Risk module was created with the intention of improving transparency across supply chains and complying with the Australian Modern Slavery Act 2018. Additionally, it allows the Risk and Compliance Officer to monitor supplier risk proactively, conduct assessments of vendors against modern slavery standards and mitigate risk. This process can be triggered at any time for any supplier once the supplier has registered on the Ariba Network. During the 2022 financial year, 30 suppliers have completed our modern slavery questionnaire, which is up from 6 who completed the risk assessment in FY21 and zero in FY20
15. Mutual Marketplace monitors media alerts against suppliers which can identify potential modern slavery compliance issues. Ariba gathers data from multiple service providers, public and private, including articles, news reports, company information and other third-party content. Suppliers are assigned a risk level by Ariba, this can automatically change dependent on media alerts, company information, country risk and natural disasters which may impact the business or supply chain.
16. We aim to ensure the entities in our supply chain comply with our modern slavery policies by including modern slavery clauses in all contracts with vendors where the activity may pose a modern slavery risk.
17. In the last reporting period, Mutual Marketplace had undertaken a comprehensive update of its internal governance policies to specifically address its modern slavery risk. Since this initiative, we have continued to take actions to reduce our modern slavery risks. Mutual Marketplace implemented a Corporate Social Responsibility Policy which includes modern slavery, this policy is included in our education program when onboarding new staff members. The education program has involved the following modules: introduction; identifying modern slavery risks in operations and supply chains; due diligence, addressing modern slavery through supplier engagement; remediation; and measuring effectiveness. All staff members are expected to be aware of modern slavery risks in our operations and educational material about modern slavery is made available with all employees.

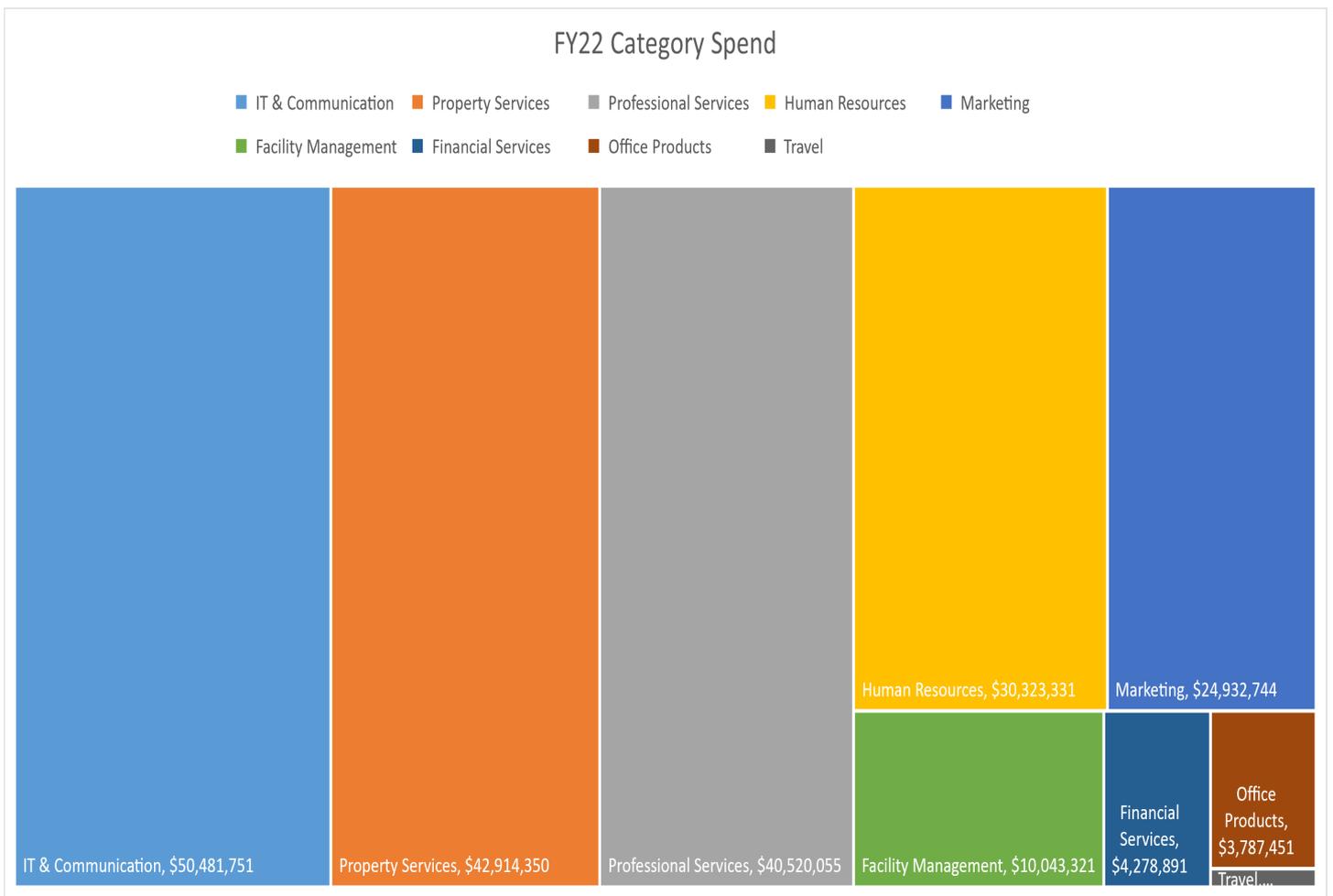
Describe how the reporting entity assesses the effectiveness of these actions

18. Mutual Marketplace has a modern slavery working group consisting of the General Manager, General Counsel and the Risk and Compliance Officer. This working group assesses the effectiveness of our controls by identifying high risk areas of modern slavery in our supply chains.

Initial Risk Assessment

19. The primary purpose of Mutual Marketplace’s initial risk assessment was to identify areas of greatest modern slavery risk in its supply chain. This provided a baseline which informed the focus of all Mutual Marketplace’s subsequent and ongoing modern slavery due diligence and remediation.
20. Incorporating company data throughout global markets, Mutual Marketplace has utilised technology on SAP Ariba to trace the inputs required to produce products and services sourced from Tier 1 suppliers to Tier 10 suppliers of our supply chain.
21. The information below has been obtained for purposes of risk identification under the Act. No information confirms the actual existence or non-existence of slavery in Mutual Marketplace’s supply chains or operations. The analysis was undertaken at the industry and country level and does not account for variances at the entity, region, or product levels.

Figure 1: Classification of Mutual Marketplace’s Tier 1 Supply Chain



Ongoing Risk Management

Effectiveness Framework

22. Mutual Marketplace acknowledges that the most practically effective and appropriate method of modern slavery due diligence and remediation in an Australian context is still very much in a developing state.
23. Mutual Marketplace is continuously assessing the nature and extent of modern slavery risks with the aim of prioritising risk mitigation and situation specific responses. The categorisation methodology is based upon whether a particular identified modern slavery risk has been caused by (most direct link), contributed to, or linked with (least direct link) Mutual Marketplace's direct business activities.
24. Due to the nature and geographic location of Mutual Marketplace's core business activities, it is inevitable that the majority of risks will lie within the latter categories. However, despite posing specific challenges, Mutual Marketplace does not consider that this means there is lesser obligation, as part of our objectives, to vigorously seek to measure the effectiveness of our modern slavery risk assessment and remediation activities.

Category	Nature of Involvement	Approach for Remediation
Caused	Mutual Marketplace's own acts or omissions and decisions, without contribution from others, caused the harm.	Immediately cease or prevent the action/ omission causing the harm and provide appropriate remediation (i.e., via Mutual Marketplace's Grievance Resolution Policy).
Contributed	Mutual Marketplace has incentivised or facilitated the harm, alongside another entity or through another entity. In all cases of contribution, the contribution must have made the harm more likely and must not be trivial.	Immediately cease or prevent the action, using leverage to mitigate the risk that any remaining impact continues or recurs. Play a direct role in remediation of the harm, sharing responsibility in it. Use third party mediator if companies cannot agree.
Linked	Mutual Marketplace has not caused or contributed to the harm but there is still a direct link between Mutual Marketplace's operations and the harm via a business relationship. There is no need for an immediate relationship: the link may be beyond the first tier of business relationships.	Use leverage to mitigate the risk of the impact continuing or recurring to the greatest extent possible. Mutual Marketplace may also play a direct role in remediation if it wishes.

Policy and Supplier Contracts Review

25. Mutual Marketplace has undertaken a comprehensive update of its internal governance policies so as to specifically address its modern slavery risks.
 26. The key policies we incorporated into our existing suite of policy documents include the following
 - 26.1. Provisions addressing modern slavery in all new supplier contracts
 - 26.2. Inclusion of Modern Slavery into the Corporate Social Responsibility Policy
-

Internal Education and Training

27. Mutual Marketplace's employee education and training on modern slavery risks within its supply chains and operations is an important component of its risk and remediation strategies.
 28. By increasing the level of formal knowledge and training regarding the risks of modern slavery, Mutual Marketplace will be more effective in its ongoing commitment to the elimination of such practices in its supply chains and operations. The education program has involved the following modules: introduction; identifying modern slavery risks in operations and supply chains; due diligence, addressing modern slavery through supplier engagement; remediation; and measuring effectiveness.
 29. The internal awareness raising efforts have primarily been in the form of virtual and face-to-face training with appropriate staff members from Mutual Marketplace will be provided in the next reporting period.
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Next Steps for Modern Slavery Risk Assessment and Remediation

30. Whilst our modern slavery risk profile has been assessed as low, we accept that modern slavery is a significant issue requiring diligence, attention, and focus. We must remain alert to potential incidents or modern slavery risks.
 31. We must remain diligent with respect to potential modern slavery issues deep within supply chains of services and products purchased or engaged by Mutual Marketplace. We are committed to deepening our understanding of the modern slavery risks within the extended tiers of the supply chain, as well as our operational practices.
 32. We've entered into an agreement with FRDM, which is a social tech company with a mission to change the world through supply chain transparency. FRDM drive viral impact throughout our supply chain from tier one suppliers right up to end suppliers. FRDM use international trade databases to create a predictive bill of materials for every purchase. Essentially FRDM breaks down our purchases DNA to determine the component and materials input. Through FY23, FRDM will provide credible signals and reports, along with their proprietary risk algorithms to provide salience and proximity of our supply chain risks.
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Certification and Statement of Conform

This statement was approved by the Board of Mutual
Marketplace Pty Ltd.



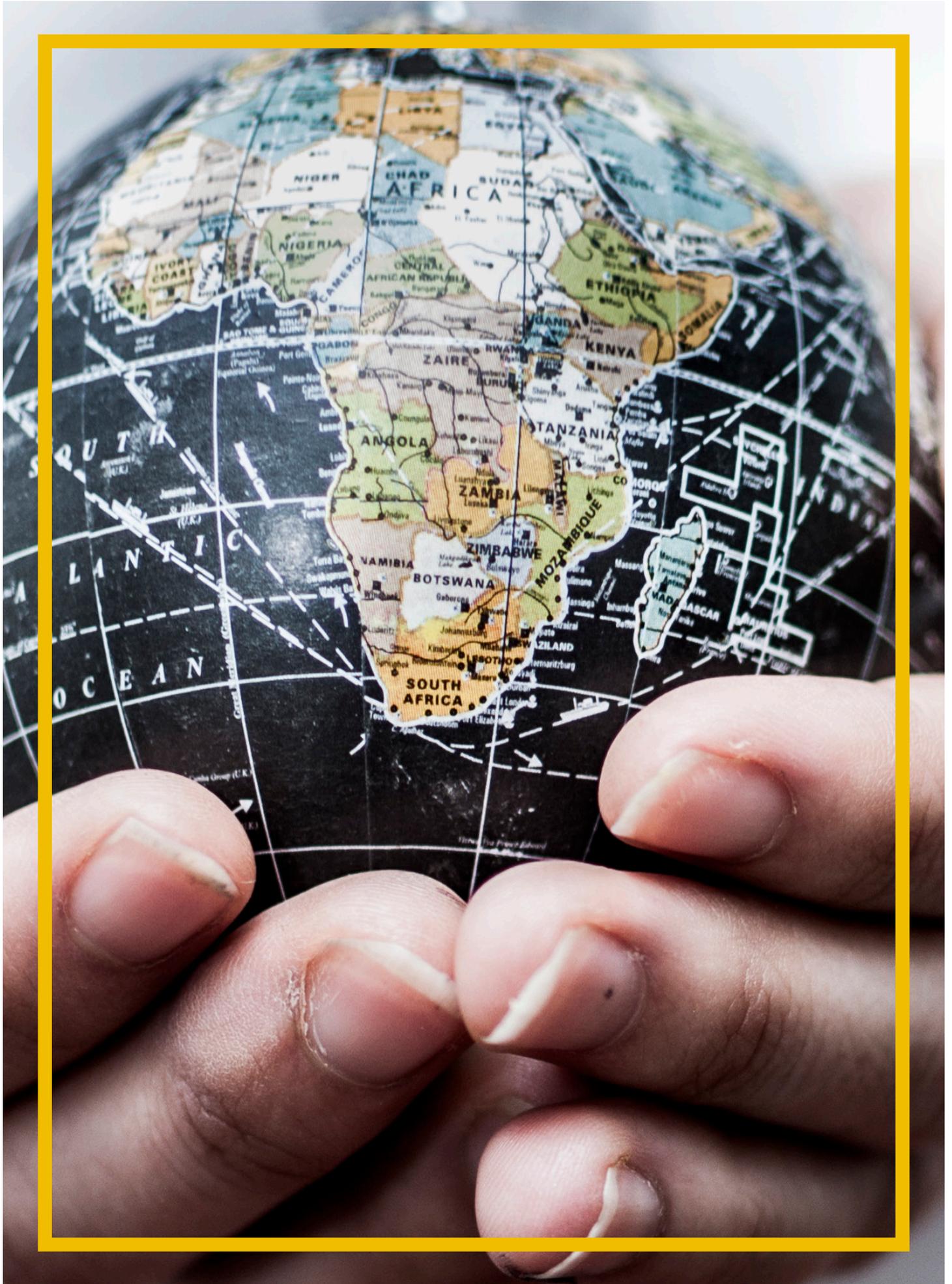
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