

# **Keystart Loans Limited**

(ABN 27 009 427 034 | Australian Credit Licence 381437)

## **Modern Slavery Statement 2025**

*We wish to acknowledge the Traditional Custodians of the land we operate on, the Whadjuk people of the Noongar nation. We also wish to acknowledge and respect their continuing culture and the contribution they make to the life of this city and region.*



## Message from our Chair

Our purpose at Keystart is to make the dream of an affordable home a reality for more people.

We believe that the right to housing is more than shelter, it encompasses access to affordable and secure homes that help individuals and families live happy and healthy lives. This is more important than ever, as the journey to home ownership has become more challenging, including through increased costs of living, record population growth and constrained supply.

We recognise our duty to respect the International Bill of Human Rights, and our responsibility as an employer to respect the International Labour Organisation Core Conventions.

We acknowledge our business impacts the lives and fundamental rights of people in Western Australia and beyond. This includes the risk of links between our business and modern slavery and human rights issues, through our products or our general corporate operations. The decisions we make and the suppliers we choose to deal with can affect the risk that a person becomes a victim of modern slavery.

It can be difficult to identify perpetrators and even the victims of modern slavery. The size of Keystart also means we have limited ability to influence in the markets and industries we operate. Despite these challenges it is important – and consistent with our purpose and culture – that we continue to improve our practices to better address the risks of modern slavery.

We are pleased that, as shown in this statement, we have continued to take meaningful steps towards better identifying and addressing the risk of modern slavery in the past financial year.

Effective 1 July 2025, our operations were restructured to consolidate multiple related entities into a single government trading enterprise, known as Keystart (ABN 74 917 542 588). This new entity will report on our future progress from the next financial year.

A handwritten signature in black ink, appearing to read "Glyn Yates".

Glyn Yates  
Chairperson  
Keystart Loans Limited

This statement was approved by the board of Keystart Loans Limited, as trustee for the Keystart Housing Scheme Trust, in its role as principal governing body on 3 December 2025

## 1. Reporting entity

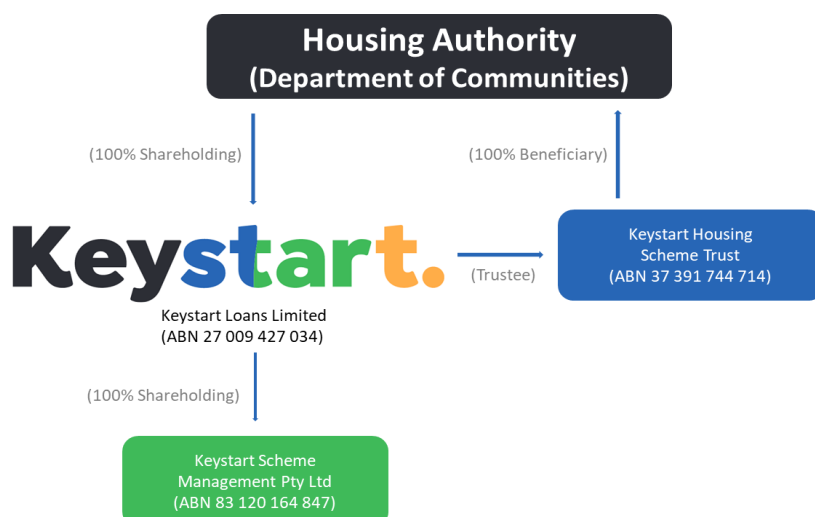
This statement is prepared on behalf of Keystart Loans Limited (ABN 27 009 427 034), together with its controlled entities, as trustee for the Keystart Housing Scheme Trust (ABN 37 391 744 714) (**Keystart Trust**) (collectively “**Keystart, our or we**”).

This statement outlines Keystart’s actions to identify and mitigate the risk of modern slavery occurring in its business and supply chains, over the financial year ending 30 June 2025 (**FY25**). This statement has been prepared to comply with the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**). The content of this statement is accurate as at the end of the FY25 reporting period.

On 1 July 2025, Keystart’s business (including all of its supplier contracts) was transferred to Keystart (ABN 74 917 542 588), a statutory corporation established pursuant to the *Keystart Act 2024* (WA), as part of a restructure of Keystart to a single government trading enterprise. Moving forward, Keystart (ABN 74 917 542 588) will assume responsibility as the reporting entity for modern slavery disclosures.

## 2. Reporting entity’s structure, operations and supply chains

### Structure



Keystart is a non-listed public company incorporated under the *Corporations Act 2001* (Cth) and regulated by the Australian Securities and Investments Commission. Keystart holds an Australian Credit Licence under the *National Consumer Credit Protection Act 2009* (Cth).

Keystart Trust is a trust established to provide housing finance to eligible borrowers. The Housing Authority (Department of Communities) is the sole beneficiary of the Keystart Trust, and 100% shareholder of its trustee, Keystart.

Keystart Scheme Management Pty Ltd (**Keystart Management**) is a subsidiary of Keystart and performs operational functions (including the employment of Keystart employees) associated with the performance of Keystart’s role as trustee for the Keystart Trust.

### Operations

Our mission is to provide transitional finance solutions for affordable home ownership in a sustainable way for the benefit of our Western Australian community.

Established in 1989 as an initiative of the Government of Western Australia, we provide low deposit home loans to West Australians unable to meet the deposit requirements of mainstream lenders.

We do this through providing a range of loans that have low entry costs, with low deposit requirements and no lender's mortgage insurance, to support West Australians to get into their own home sooner.

We also facilitate shared ownership home loans, working with a range of partners that fund a portion of the purchase price of a house. This means the customer only requires a loan for the remaining share of the property, reducing the loan amount.

We have arrangements with other organisations to provide broader access to home loans for West Australians.

Examples of the above arrangements include:

- Managing a portfolio of home loans for Bendigo Bank following an equitable assignment of these loans to Bendigo Bank in September 2016; and
- An arrangement with the Housing Authority (Department of Communities) to provide shared-ownership home loans.

We raise funds for our lending and operations through the issue of redeemable preference shares to the Housing Authority (Department of Communities). We receive applications for loans directly from customers and through a network of mortgage brokers.

Our office is located at Level 3, 502 Hay Street, Subiaco, Western Australia 6008. We employ 147 people working across seven business areas:

- Credit Decisioning;
- Credit Management;
- Customer Experience;
- Finance;
- Information, Communication and Technology;
- Legal and Risk; and
- Organisational Capability.

As a non-listed public company under the *Corporations Act 2001* (Cth), an independent board of directors oversees our operations.

### Supply chain

We engage a broad range of suppliers to help enable our business and assist our staff to remain connected and engaged with our customers.

Many of our supplier arrangements are stable long-term relationships governed by a contract. For regularly used services including recruitment, property services, marketing, legal and valuation services we look to establish panel arrangements with several suppliers for a term of three to five years. However, when the need arises, we engage suppliers on a short-term basis or for one-off purchases.

The main types of goods and services we purchase to support our operations are in the following areas:

- Office stationery and supplies;

- IT hardware;
- IT software;
- Consulting services (e.g., audit, legal, software development and support, recruitment and professional services);
- Marketing services (e.g., graphic design, web design and merchandise); and
- Property services (e.g., real estate services and maintenance).

### 3. Risk of modern slavery

#### Higher risk goods and services

During FY25, we used 215 suppliers, comprising of 184 existing suppliers used in previous financial years and 31 new suppliers.

Due diligence was completed for all 31 new FY25 suppliers, based on a combination of:

- supplier responses to our modern slavery questionnaire;
- a review of each supplier's own disclosures, including modern slavery statements for those suppliers that are reporting entity; and/or
- information publicly available on suppliers from third party sources such as Know the Chain and the Business & Human Resources Centre.

Consistent with previous years, there were four areas of higher risk identified across the goods or services we purchase. We used a total of 21 suppliers in these higher risk areas in FY25, as set out below:

- **IT hardware (6 suppliers)**
  - geographic risk due to production location of laptops, computers and mobile phones;
  - product risk due to use of products associated with risk of forced labour, e.g., laptops, computers and mobile phones.
- **Property services (5 suppliers)**
  - sector risk due to use of low skilled workers and hazardous work;
  - supply chain risk due to use of sub-contracting;
  - product risk due to use of products associated with risk of forced labour, e.g., bricks and timber.
- **Marketing services (4 suppliers)**
  - geographic risk due to production location of apparel and merchandise;
  - product risk due to use of products associated with risk of forced labour, e.g., apparel and clothing accessories.
- **Fresh fruit and coffee (6 suppliers)**
  - sector risk due to use of seasonal and low skilled workers;
  - product risk due to use of products associated with risk of forced labour, e.g., coffee;
  - geographic risk due to production location.

Of the 21 suppliers in these higher risk categories, all of these were existing suppliers used in previous financial years.

While acknowledging that level of spend is not an indicator of the risk of modern slavery, our spend on the above suppliers is minor as a proportion of procurement spend.

### Geographic risks

Whilst most of our suppliers are based in Australia, during FY25 we also used suppliers based in the USA (16 suppliers), New Zealand (2 suppliers), Hong Kong (1 supplier) and the European Union (6 suppliers).

Based on the nature of the services provided (consulting services, software licences and software as a service) and the level of modern slavery risk for each country, we consider these overseas suppliers to be low risk.

### Limitations on our understanding of risk

While we are not aware of any incidents of modern slavery relating to any of our suppliers, this does not conclusively mean there is no modern slavery in our supply chain.

We identified the following limitations on our understanding of our modern slavery risks:

a) Lack of Engagement

We had previously encountered difficulties in obtaining responses to our modern slavery questionnaire from a small number of our suppliers, usually large multinational companies, whose goods and services we procure on a self-serve basis.

To mitigate this risk, we implemented our new vendor due diligence framework, which assists us in assessing modern slavery risks using publicly available information.

b) Inactive Suppliers

We recently identified an issue in relation to engaging inactive suppliers with out of date or incomplete modern slavery due diligence. The issue related to a single supplier who had been inactive prior to the commencement of our modern slavery obligations. We have since completed the necessary due diligence for that supplier and will implement a process for inactive suppliers to prevent the issue arising again.

c) Second Tier Suppliers and Beyond

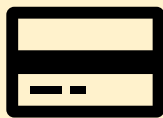
We also acknowledge that we currently have limited direct visibility over second tier and beyond suppliers.

## 4. Actions to address risk

In our previous statement we expressed an intention to commence a range of initiatives in support of identifying and managing modern slavery risk. These initiatives, and the progress towards them during FY25, were as follows:

Initiative	Outcome
<b>Implementing an improved vendor due diligence form</b>	We implemented an improved vendor due diligence form which contains risk assessments for different supplier-related risks, including modern slavery risk. This new form has improved our risk assessment of modern slavery by providing enhanced guidance on how users can assess the responses to the modern slavery questionnaire and form a view on modern slavery risk.
<b>Identifying contracts that contain modern slavery clauses and those that do not</b>	We reviewed our supplier contracts and identified those that do not contain a modern slavery clause. We are exploring how we can utilise this data to uplift our procurement and embed more robust contractual arrangements with our suppliers around modern slavery compliance.
<b>Finalised outstanding modern slavery due diligence for existing active suppliers</b>	We identified 22 suppliers from last financial year ( <b>FY24</b> ), where we were unable to obtain responses to our modern slavery questionnaire. In FY25, we assessed these suppliers for modern slavery risk, using our new vendor due diligence framework.
<b>Monitor and investigate any modern slavery complaints, including as disclosed through whistleblowing</b>	We implemented a process for the monitoring and investigation of complaints relating to modern slavery or human rights impacts more broadly. No such complaints were identified in FY25.

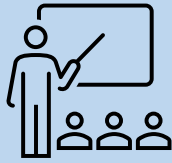
In addition to the above, we took several other actions during FY25, in support of identifying and managing modern slavery risk:



In the past 2 financial years (FY23 & FY24), we acknowledged that we did not have full visibility of our modern slavery risks in relation to suppliers who were paid by credit card. In FY25, we completed a review of all credit card spend and identified a list of regular suppliers, whose services are paid by credit card (e.g. licences, subscriptions and memberships). We completed the necessary due diligence on these suppliers and identified an additional 15 suppliers that have not previously been captured in our modern slavery supplier review. We are creating a process to ensure that due diligence is required and completed where credit cards are used for regular payments.



We reviewed our high-risk suppliers and identified those suppliers with due diligence that was more than 12 months' old. We then re-completed modern slavery due diligence for these suppliers.



During FY25, we continued to provide organisation-wide training on modern slavery through our learning management system and at whole of business showcases / presentations as part of on-going risk and compliance training. We also provided additional training sessions for our Senior and Executive Leadership Teams. Additionally, we uplifted certain policies and processes to ensure greater oversight of modern slavery and other risks.

## 5. Assessing the effectiveness of our actions

During FY25, our focus was to further develop our processes to enhance our visibility around how modern slavery risks could be present in our operations and supply chains, with a focus on further analysis of our existing suppliers. We did this through the actions discussed in the previous section. We also maintained a modern slavery working group, made up of representatives from across the business, to track the progress of actions.

At this stage, due to having a limited dataset, it remains difficult to assess the effectiveness of measures we have undertaken. Our limited dataset is the result of having a relatively small number of suppliers than may be typical of other modern slavery reporting entities in the financial services sector. We also have a relatively stable list of suppliers, with low turnover, which further limits the insights we can gain from our dataset.

In FY26, the new reporting entity, Keystart (ABN 74 917 542 588), will continue Keystart's work on implementing and developing frameworks and processes to ensure that it can review the effectiveness of the actions it takes to assess and address or mitigate modern slavery risks in its operations and supply chains.

## 6. Consultation

This statement was prepared with the benefit of consultation with Keystart Management, the one entity owned and controlled by Keystart. During FY25, all persons contracted by Keystart to carry out our business, were employed by Keystart Management. Our board and the board of Keystart Management consist of the same individuals. As such, Keystart Management was actively involved in all matters covered by this statement throughout FY25.