
Modern
Slavery
Statement

HUB24

Modern Slavery Statement

YEAR ENDED 30 JUNE 2023

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Introduction

At HUB24 our purpose is empowering better financial futures together. HUB24 leads the wealth industry as a provider of integrated platform, technology, and data solutions.¹ We seek to make a difference in our customers' lives by connecting them to innovative solutions that create better outcomes. We are proud of our brand and reputation, and we maintain high standards of ethics and conduct.

In line with the UN Guiding Principles on Business and Human Rights, HUB24 recognises the duty of States to protect human rights as well as the responsibility of businesses to respect human rights. Modern slavery involves the most serious forms of human exploitation and takes many forms including: human trafficking, slavery, servitude, forced labour, debt bondage, deceptive recruitment for labour or services, forced marriage, and child exploitation/labour.²

We recognise that the nature and reach of our business may expose us to the risk of modern slavery in our value chain (our people, our operations, partners and customers, and our supply chain), and we are committed to identifying and mitigating these risks.

This Statement is made by HUB24 Limited (ACN 124 891 685) pursuant to section 13(1) of the Modern Slavery Act 2018 (Cth). It constitutes the Statement of HUB24 Limited and its owned and controlled entities (together the HUB24 Group). Our Statement outlines the actions undertaken by HUB24 to identify and mitigate the risk of modern slavery occurring in our value chain during the financial year ending 30 June 2023 as well as our ongoing commitment to continuous improvement.³

We are delighted to share with you HUB24's Modern Slavery Statement and we look forward to keeping you updated as we work to continuously improve our identification, management, and mitigation of modern slavery risk exposure.



Andrew Alcock
Managing Director and CEO
HUB24 Limited



Paul Rogan
Board Chair
HUB24 Limited

1. Best Platform Overall in the 2022 Adviser Ratings Financial Advice Landscape Report.

2. *Modern Slavery Act 2018* (Cth), and the associated Guidance for Reporting Entities published by the Department of Home Affairs, Australian Border Force.

3. This Statement has been prepared in accordance with the requirements of Section 16 of the *Modern Slavery Act 2018* (Cth). The Statement applies to all entities within the HUB24 Group that are subject to the provisions of that Act.

Our structure, operations, and supply chain

OUR STRUCTURE

HUB24 Limited (HUB24, the Group or the Company) is a financial services company that was established in 2007 and is a leading provider of integrated platform, technology and data solutions to the Australian wealth industry.

We operate our business under the following brands:



Our online products and services are offered and supplied in Australia. Our customers can access our online platform both in Australia and globally.

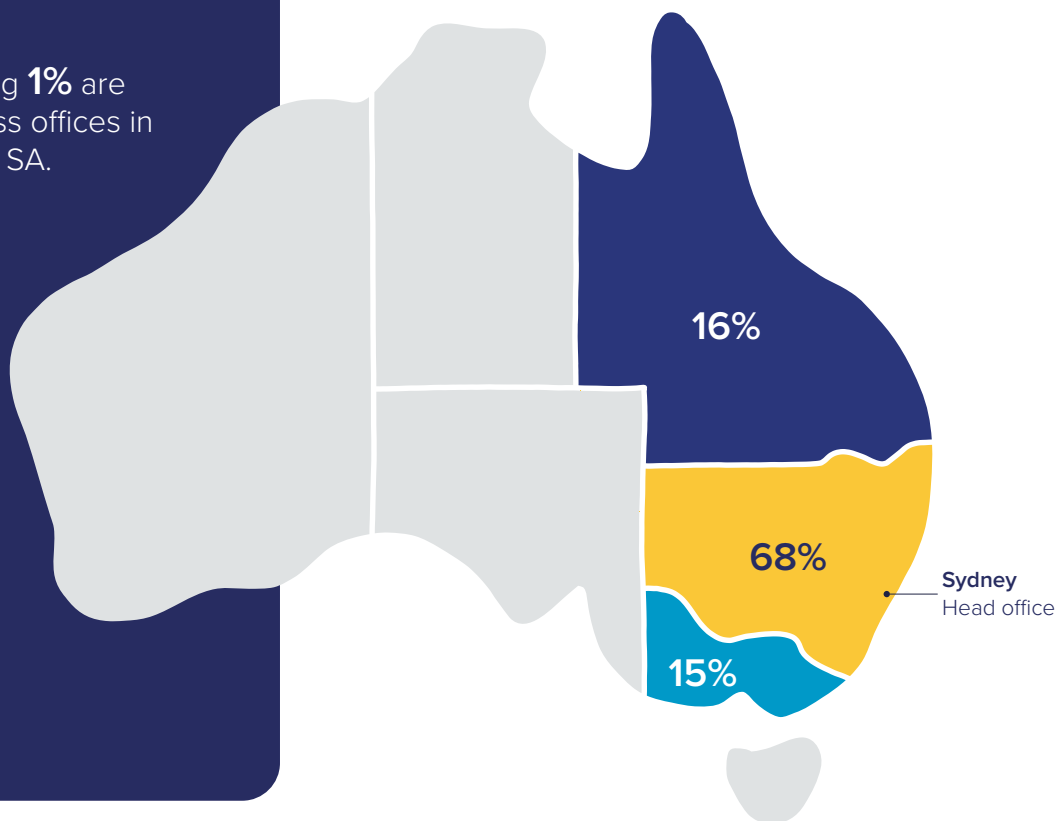
OUR OPERATIONS

Our core operations are performed from our registered offices located at Level 2, 7 Macquarie Place, Sydney NSW 2000 and Level 20, 580 George Street, Sydney NSW 2000.

As at 30 June 2023, the Group employed 838 people on a full-time equivalent (FTE) basis. Approximately 65% of our people are dedicated to product innovation, technology, and customer service. Our people are employees on permanent, fixed term contracts, casual contracts, and direct contracts. Approximately 87% of our people are employed on a permanent basis.

Our people are situated nationally, with our Head Office located in Sydney.

The remaining **1%** are located across offices in TAS, WA and SA.





PLATFORM

The Platform segment comprises the HUB24 investment and superannuation platform (HUB24 platform), the Xplore Wealth investment and superannuation platform (Xplore Wealth platform), Portfolio Administration & Reporting Services (PARS) and myprosperity.

The HUB24 and Xplore platforms are used by financial professionals to efficiently administer their clients' investments held through a superannuation and investment product under custodial arrangements.

As one of the fastest growing platform providers in the market, the HUB24 platform is recognised for providing choice and innovative product solutions. It offers financial professionals and their clients a comprehensive range of investment options, including market leading managed portfolio solutions, and enhanced transaction and reporting functionality.

The Xplore platform provides complementary capabilities including high net worth product features, managed accounts, superannuation services and PARS capability. Xplore's products and services are being migrated to the HUB24 platform throughout FY23 and FY24.

In addition, HUB24 also offers PARS, a non-custody portfolio service which provides administration, corporate action management and tax reporting services for financial professionals and their clients.

myprosperity

myprosperity, acquired by HUB24 in May 2023, is a leading provider of client portals for accountants and financial advisers. It is an all-in-one secure portal that delivers a total view of household wealth, making it easier for households to collaborate with their financial professionals across all aspects of their financial lives. myprosperity's client portal is used by over 440 accounting and financial advisory firms, as well as approximated 63,000 households¹.



TECHNOLOGY SOLUTIONS

The Technology Solutions segment comprises Class and HUBconnect.

Class

Class is a pioneer in cloud-based wealth accounting and is recognised as one of Australia's most innovative technology companies.

Class delivers trust accounting, portfolio management, legal documentation, corporate compliance and SMSF administration solutions to over 6,000 customers across Australia who depend on Class to drive business automation, increase profitability and deliver better client service.

Class's core offering is self-managed superannuation fund (SMSF) administration software. Its solutions have gained industry recognition for product innovation and customer service excellence.

Customers using the Class Super, Class Portfolio and Class Trust solutions represented over 202,000 accounts as of 30 June 2023. Class also operates in the document and corporate compliance segment through the service offerings provided under the NowInfinity brand².

NowInfinity is a leading cloud-based entity management and corporate compliance solution. In the Investment Trends 2022 SMSF Adviser & Accountant Report, NowInfinity was recognised as the most used legal document provider for SMSF related legal compliance.

HUBconnect

HUBconnect provides technology and data services to the wealth industry, delivering innovative solutions to enable financial professionals to efficiently run their businesses and service their clients.

HUBconnect leverages data and technology capability to provide solutions that solve common challenges faced by stockbrokers, licensees and professional advisers in the delivery of financial advice. Through innovative technology such as machine learning, artificial intelligence, and natural language processing, HUBconnect integrates, refines, stores and supplies structured and unstructured data. Through integrated data feeds, automated reporting and analytics, HUBconnect delivers efficiencies for some of the time-consuming and costly processes that increase the cost of delivering advice. HUBconnect serves a growing number of respected and high-profile financial services companies and their clients.

HUB24 is a strategic shareholder in Diverger Limited (Diverger), which is a diversified financial services business providing integrated accounting and wealth management services to the Australian Market. Under a Technology Partnership and Distribution agreement Diverger is a cornerstone client for HUBconnect's data and technology services.

HUBconnect Broker has a long history of working with stockbrokers to deliver innovative business reporting and support tools. HUBconnect Broker streamlines and integrates client data and connects to a range of broking business reporting and back-office support tools that provide key insights and enable the efficient delivery of stockbroking operations.

1. HUB24 data as at June 2023.

2. NowInfinity is a wholly owned subsidiary of Class.

Our structure, operations, and supply chain

continued

OUR SUPPLY CHAIN

Our business is primarily office-based encompassing hybrid workings arrangements for Our People. The types of goods and services we procure are mainly in relation to the HUB24 Platform Service. Our supplier arrangements range from one-off purchases with non-contracted suppliers through to multi-year, large value strategic partnerships governed by supplier contracts. Across these main supplier categories, we have identified more than 500 suppliers that support us in operating our business.

Whilst these suppliers are primarily located in Australia, we also work with suppliers based in other countries, including the United States of America, the United Kingdom, Ireland, India, Israel, Macedonia, The Netherlands, Philippines, Ukraine, and Vietnam.

In FY23, our total supplier and other third-party spend has been across the following categories:

Supplier Category	Description of spend	% of spend
Professional services	Includes legal, accounting, audit, insurance, other consulting services, contractors	45
Financial services	Includes Sub-custody services	20
Software services	Software procurement and licensing services	17
Property management	Office premises, construction, and fit out projects in our corporate offices	7
Third party trustee and responsible entity services	Includes Superannuation Trustee services in relation to HUB24 Super	3
IT services	Includes IT and telco hardware or consumables	2
Third party Responsible Entity services	Includes Responsible Entity services in relation to HUB24 Managed Portfolio Service	1
Investment Management	Includes Sub-investment management services	1
Investment facilities	Includes banking	1
IT consulting	IT and technology advisory services	1
Telecommunications	Networks	1
Recruitment	Labour hire agencies	1

Our progress in FY23

Based on our determination of the scope of HUB24's modern slavery risk exposure and our approach, our progress to mitigate and manage modern slavery risk exposure in FY23 is summarised below with reference to the key focus area of governance, and our three key areas of modern slavery risk:

Key focus area / Modern slavery risk exposure area



Our governance (a key focus area)

Key Actions

- The HUB24 Group Risk Taxonomy was revised and now more explicitly incorporates human rights and modern slavery risk.
- The HUB24 Group Risk Appetite Statement was updated, and Key Risk Indicators for the group risk profile were enhanced.
- External expertise was obtained to assist with the review and refresh of HUB24's core values.
- The HUB24 Group Sustainability Council continues to provide oversight on the progress of our seven ESG focus areas.
- We have aligned our focus areas to the UN Sustainability Development Goals (SDGs), including SDGs on gender equality, decent work, and economic growth.
- We commenced a strategic review of our Sustainability and ESG commitments and actions, engaging an external consultant to provide further insights on our opportunities to further our agenda around diversity and inclusion, environmental impact, community engagement and enhancing the overall sustainability of our product and business.

Key focus area / Modern slavery risk exposure area



Our operations, partners and customers

Key Actions

- We enhanced the governance and oversight framework for Australian Financial Services Licensees (AFSL) using the HUB24 platform including by revising the Charter of the HUBAC (Advice Committee). This framework manages the risks arising from our relationships with AFSL advisers using our Platform.
- We have continued to implement revised advice licensee agreements that contain uplifted modern slavery provisions, for new platform usage terms to be made available.
- We conducted our annual Advice Licensee compliance attestation. We received a positive response of 97% to questions pertaining to Modern Slavery risk.
- We continued to support financial advisers with ESG education and the availability of over 150 ESG investment options on the HUB24 platform to support client ESG preferences.
- We continued to operate our governance and oversight framework for Investment Managers using the HUB24 platform including regular meetings of the HUBIC (Investment Committee).
- We enhanced our customer screening capability to help identify suspected instances of modern slavery.

Key focus area / Modern slavery risk exposure area



Our suppliers

Key Actions

- We continue to review and approve all new supplier arrangements through a standard checklist. The checklist must be reviewed and signed off before a supplier agreement is executed which ensures that commercial managers have considered the implications of modern slavery before entering into any agreement.
- The HUB24 Investment Committee continues to provide oversight of Investment Managers, including selection appointment, compliance and performance.
- We reviewed our vendor management framework as part as uplifting our supplier management.
- We continue to manage our supplier relations and performance levels through periodic supplier reviews.

Our progress in FY23

continued

Key focus area / Modern slavery risk exposure area

Our people



Key Actions

- We formally launched our HUBempower community giving program across the HUB24 Group, governed by an employee member council. HUBempower encourages our people to engage and contribute to communities across Australia via our charity partners, provides volunteer leave for all team members, and gift-matches donations to their chosen charity.
- We introduced employee timesheets from 1 July 2023 to ensure accurate timekeeping records are captured for all employees covered by a modern award. A monthly reconciliation is undertaken to monitor completion and audit working hours against eligible entitlements to ensure compliance with legislative requirements.
- We conducted a detailed review of relevant employment legislative changes to ensure working arrangements, employment contracts, policies and payroll practices were consistent and compliant. This included a detailed review of all modern awards applicable to our workforce and roles across the Group.
- We introduced our first risk culture survey and scored a Group total of 80% for questions relating to our people's wellbeing with a participation rate of 79% across the group.
- We conducted regular employee engagement surveys, recording a score of 74% in FY23 (up from 72% in FY22) with 90% participation across the Group.
- We promoted People risk in our revised risk taxonomy to be a standalone risk with enhanced Key Risk Indicators reported quarterly.
- We continue to use market data from external remuneration benchmarking and reviews, including conducting our gender pay gap analysis to understand trends and remunerate our people accordingly. HUB24's remuneration approach reinforces our commitment to fairness and equity for all our people.
- We continue to attract diverse talent through Graduate, Intern, and STEM Returners programs.
- We continue to provide flexible and hybrid working options for our team, managing work life balance, important face to face connection with colleagues and maintaining a focus on productivity and quality service to our clients.
- We launched the new Sonder Employee Assistance Program to provide access to free 24/7 medical, mental health and safety support for our people and their immediate family members and continues to grow in employee take up and participation.
- We have increased our focus on Psychosocial Hazard education and awareness, including launching an employee representative consultation committee to socialise resources and communications in relation to identification, management and mitigation of psychosocial hazards in the workplace.
- We launched a refreshed recognition program 'HUBheroes', recognising and rewarding our people and enhancing our values-based culture.
- We continued to invest in workplace learning including technical, leadership and soft skills learning offerings, including conducting talent reviews and providing internal development and promotion opportunities within the business.
- We achieved 100% training completion rate for all staff mandatory e-learning was achieved (including Modern Slavery, Anti-bribery & Harassment, Discrimination, Conflicts of Interest, Anti-money laundering & terrorism financing, Work, Health & Safety, and Whistleblower Protection).

Our approach


A RISK-BASED APPROACH

HUB24 takes a risk-based approach to identifying and assessing modern slavery risk in our operations and supply chain. Our modern slavery risk assessment considers the four key modern slavery risk factors¹ of:

Modern slavery risk factor	Description
Vulnerable populations	Groups more likely to be exposed to harm or unable to advocate for themselves in exploitative situations. Examples of vulnerable populations include low skilled, temporary, and seasonal workers as well as immigrant workers.
High-risk geographies	Countries or regions which are known to have higher human rights risks, including modern slavery risk. Prevalence of modern slavery risk is highest in Africa and Asia Pacific, followed by Europe and the Arab States ² , however it exists in every country including in Australia.
High-risk sectors	Industries, products, and services regarded as having more significant inherent modern slavery risk. Examples include IT supply chains, raw materials, agriculture, manufacturing, construction, cleaning, hospitality, and food services.
High-risk business models	Business models that have higher human rights risks, including modern slavery risk. Examples include labour hire outsourcing with high use of precarious labour, low-cost goods and services, sourcing in countries with contested land use, and complex supply chains with limited visibility ³ .


Based on these risk factors⁴, we seek to define the scope of our potential modern slavery risk exposure by identifying the potential for HUB24 to cause, contribute to, or be directly linked to modern slavery through our operation and supply chain⁵. Our risk management response will vary according to our level of involvement in adverse human rights impacts.


We have established a Modern Slavery Risk Assessment Methodology for our suppliers which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location and specific entity risk. Overall, and based on our assessment, our Supply Chain Modern Slavery Risk Profile is low. Our assessment of our Modern Slavery Risk Profile as it applies to our Suppliers is summarised below:



Sector / Industry
The large majority of suppliers were assessed as falling within the professional technology and financial services industry in Australia. These sectors typically carry a low level of risk associated to modern slavery practices.


Other sectors and industries include marketing media, telecommunications, financial education, compliance, and property management.


 **Low risk**




Product / Service
Risks associated with a specific product or service were assessed as low for the period. This is predominantly as a result of the profile of our core suppliers who specialise in technology, software, financial services, and professional services.


We have minimal exposure to suppliers with cyclical production and/or high-risk raw material usage to manufacture the products and services that we consume.

 **Low risk**




Geographic
The large majority of suppliers are headquartered in Australia, and as such our geographic exposure risk to modern slavery practices during the period was deemed low. The remaining portion of suppliers are predominantly based in the USA, United Kingdom and Europe. During FY23, there were no suppliers identified that were headquartered in 'high risk'⁶ jurisdictions.

 **Low risk**



Specific Entity
There were no specific entities identified during the period that we deemed as having significant risks associated with modern slavery practices.

 **Low risk**

1. Modern Slavery risk factors are summarised from sources including the Global Slavery Index -2018, and the Australian Human Rights Commission/KPMG "Financial Services and Modern Slavery practical responses for managing risk to people" (2021)
 2. Global Slavery Index 2018.
 3. <https://shiftproject.org/resource/business-model-red-flags>
 4. And financial sector risk prevalence indicators from the Monash Centre for Financial Studies (MCFS) Modern Slavery Research Project.
 5. Modern Slavery Act 2018 (Cth) and the Global Slavery Index 2018.
 6. Global Slavery Index 2018 published by the Walk Free Foundation.

Our approach

continued

HUB24 MODERN SLAVERY RISK EXPOSURE

Modern slavery risk exposure area

Our people



Types of modern slavery risk potential exposure ¹	HUB24 potential continuum	Inherent overall risk rating	Key Factors <i>(see also key risk mitigants identified elsewhere in this Statement for each modern slavery risk exposure area)</i>
Deceptive recruiting for labour services	Cause	Low	There may be risk of exploited labour within our workforce. This risk may be higher in countries that are higher risk for modern slavery and/or indirect employment-arrangements including those with lower-skilled workers. HUB24 has a predominantly directly employed professional workforce located within Australia.
Slavery	Cause		
Servitude	Cause		
Debt Bondage	Cause		
Forced labour	Cause		
Human Trafficking	Cause		
Child labour/exploitation	Cause		
Forced Marriage	Directly linked		

Modern slavery risk exposure area

Our suppliers



Types of modern slavery risk potential exposure ¹	HUB24 potential continuum	Inherent overall risk rating	Key Factors <i>(see also key risk mitigants identified elsewhere in this Statement for each modern slavery risk exposure area)</i>
Deceptive recruiting for labour services	Directly linked	Medium to low risk ²	As a purchaser of goods and services, there may be a risk that we could be involved in modern slavery if it is present in our supply chain. Our level of involvement may be influenced by our sourcing and procurement practices. Our risk may be higher where we procure goods and services that are manufactured in, or use raw materials sourced from industries or countries that are higher risk for modern slavery. Based on our supply chain profile, risk of modern slavery in the direct suppliers on our Supplier Register is low. We recognise that this risk may increase further down our supply chain where we have less visibility, and influence.
Slavery	Directly linked		
Servitude	Directly linked		
Debt bondage	Directly linked		
Forced labour	Directly linked		
Human trafficking	Directly linked		
Child labour/exploitation	Directly linked		
Force marriage	Directly linked		

1. Our determination of exposure by modern slavery risk type is partially influenced by the Financial Sector Risk Prevalence Indicators established by the December 2021 “Measuring Disclosure of modern slavery statements ASX300 Companies,” white paper of the Monash Centre for Financial Studies. See further Appendix 3.
 2. Across HUB24’s twelve supplier categories we rated six categories medium risk and six categories low risk.

Our approach

continued

Modern slavery risk exposure area



Our operations, partners & customers

Types of modern slavery risk potential exposure ¹	HUB24 potential continuum	Inherent overall risk rating	Key Factors <i>(see also key risk mitigants identified elsewhere in this Statement for each modern slavery risk exposure area)</i>
Deceptive recruiting for labour services	Contribute to	Low	As a financial services provider there may be modern slavery risk exposure through the financial products and services we provide, either on our own or with our partners, and to our customers.
Slavery	Contribute to		
Servitude	Contribute to		We could be involved in modern slavery if our partners or customers use our products and services for activities that involve modern slavery. This risk may be higher where our partners or customers are involved in activities, industries or countries that are higher risk for modern slavery. Modern slavery may be linked to financial crimes such as money laundering, corruption and sanctions.
Debt Bondage	Directly linked		
Forced labour	Contribute to		
Human Trafficking	Directly linked		
Child labour/exploitation	Directly linked		
Forced Marriage	Directly linked		For third party investment options offered on the HUB24 Platform, such as where we provide access to investments managed by external parties, we do not conduct any due diligence or other assessment of how the third parties assess and address their modern slavery risk. The nature of these investments provides limited ability for HUB24 to influence the level of modern slavery risk associated with underlying entities or assets.
			We may risk supporting modern slavery through donations such as where a charity may have modern slavery in its operations or supply chain or our donations may not be used as intended. We manage this risk through the activities of the HUBempower Council and the Group Donations Policy.

1. Our determination of exposure by modern slavery risk type is partially influenced by the Financial Sector Risk Prevalence Indicators established by the December 2021 "Measuring Disclosure of modern slavery statements ASX300 Companies," white paper of the Monash Centre for Financial Studies. See further Appendix 3.

Our approach

continued

GOVERNANCE

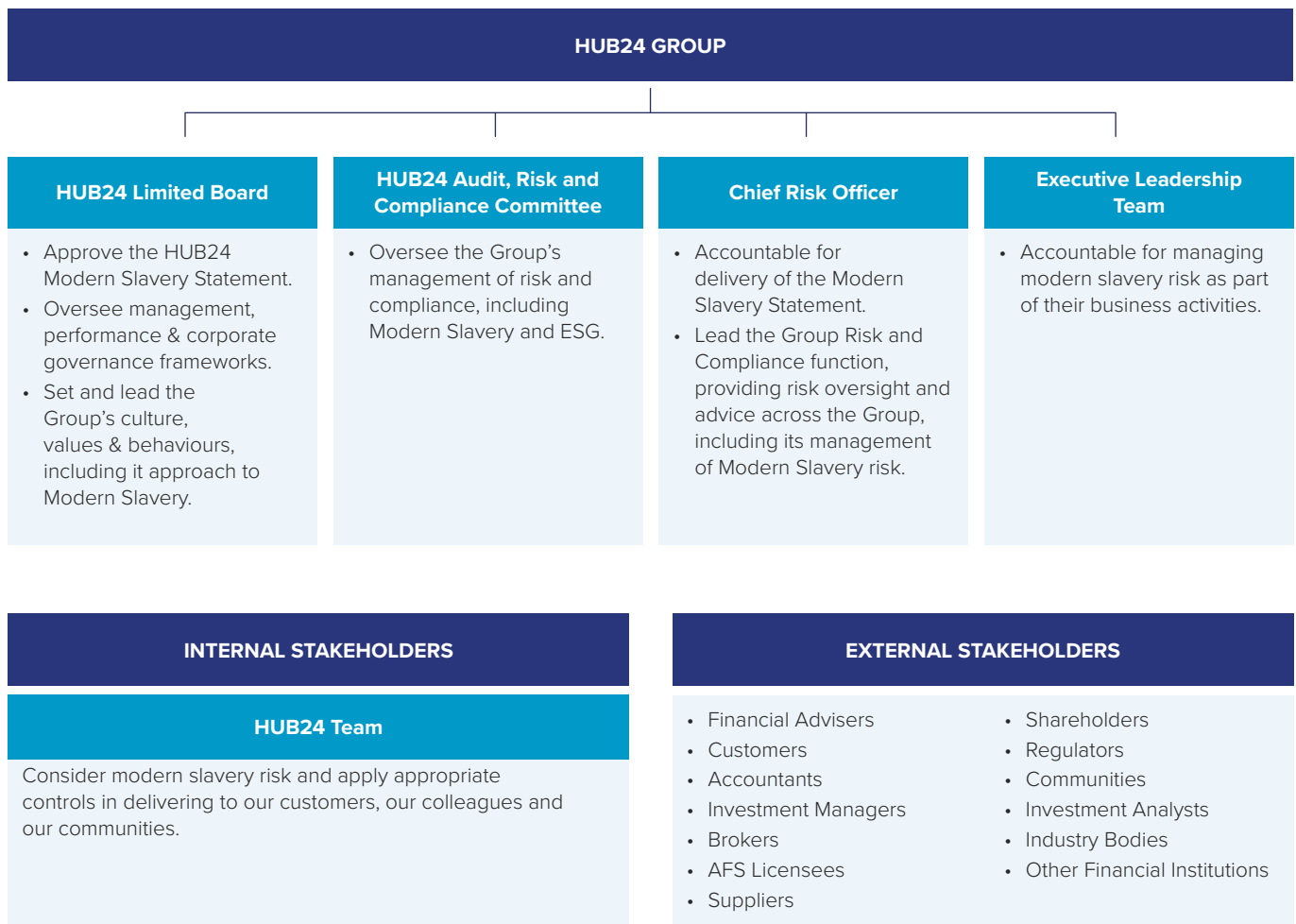
HUB24 has adopted the ASX Corporate Governance Council’s Corporate Governance Principles and Recommendations (4th Edition) and is committed to recognising and managing risk. The Board, places great importance on high standards of governance and regularly reviews its governance practices to address our obligations as a responsible corporate citizen. Members of the Board and our people are responsible for upholding the values of HUB24, as reflected in our [Code of Conduct](#).

Our governance arrangements are set out in our [Corporate Governance Statement](#).

In FY23, HUB24 published its annual [Sustainability Report](#). HUB24’s sustainability approach supports the delivery of the group strategy and aligns to our purpose of empowering better financial futures, together. Our Sustainability Report reflects our commitment to managing the company considering the broader community, customer, environmental and shareholder interests.

HUB24’s Corporate Governance Framework, policies, and practices are designed to ensure the effective management and operation of HUB24 and are regularly reviewed and updated.

The following Board and management arrangements are in place to oversee HUB24’s management of risk including identified modern slavery risks:



Our approach

continued

Our management of modern slavery risk is aligned to our Risk Management Framework and newly revised Risk taxonomy including through the following risk types which are identified as critical to the management of our exposure to modern slavery risk:

Risks identified	Modern Slavery Dimension	Modern Slavery Mitigants
People risk	The risk that the Group fails to comply with legal and regulatory obligations in relation to its employees or those engaged to perform work on behalf of the Group.	<ul style="list-style-type: none"> Employee timesheets to ensure compliance with Modern Award. Review of employment contracts against legislative requirements. External remuneration benchmarking. Employee Assistance Program. Staff training, including mandatory compliance training.
Distribution risk	The risk that the Group does not appropriately perform due diligence, oversee and/or monitor advice licensees.	<ul style="list-style-type: none"> Governance and oversight of advice licensees, overseen by HUBAC. Annual licensee compliance attestation that includes Modern Slavery elements. Standard onboarding process and contractual terms.
Operational risk	The risk that the Group fails to appropriately manage the risks arising from its supplier arrangements.	<ul style="list-style-type: none"> Supplier screening and due diligence processes for our material service providers/ new suppliers prior to the signing of supplier agreements. Specialist IT Procurement capability given higher risk profile of technology service providers. A relationship manager is appointed to each material service provider, and we maintain monitoring and oversight arrangements over these providers. Contractual terms in relation to modern slavery require our suppliers to comply with Modern Slavery Laws, have reasonable measures in place to ensure compliance (including review of supplier's supply chains), and notify HUB24 of breaches of compliance.
Financial Crime and Fraud Risk	The risk that the Group is involved or facilitates money laundering, terrorism financing, acts of bribery or corruption or does not comply with economic and trade sanctions.	<ul style="list-style-type: none"> AML/CTF program that meet regulatory requirements. Initial, enhanced and ongoing due diligence on customer, employees and third parties. Unusual and Suspicious Matter Reporting. Sanctions and Political Exposed Person monitoring. Customer and Employee Screening.
Compliance and Conduct Risk	The risk of failing to comply with compliance obligations, including Modern Slavery legislation.	<ul style="list-style-type: none"> Risk and Compliance Policies and infrastructure to support management of Modern Slavery. Whistleblowing processes.
Reputation and Sustainability Risk	The risk that the Group's reputation is damaged because of a failure to respond to current or emerging social risks, including human rights and Modern Slavery.	<ul style="list-style-type: none"> HUBempower Council monitors community giving program and the Group's engagement in social enterprises. Sustainability Council monitors progress against ESG focus areas.

Our approach

continued

Case study:

New financial crime risk system

In 2023 HUB24 invested in a new software solution to enhance the way we manage financial crime risk. The technology monitors, validates and reconciles organisational data from different platforms and sources. The implementation consolidates our monitoring capability from multiple systems into one with the addition of a leading case management capability. The software screens our customers and monitors our transactions for risk.

Screening involves comparing the identifying details of our customers against intelligence lists of sanctioned persons and people convicted of crimes such as human trafficking. The use of the technology has allowed HUB24 to apply more precise matching logic and improve the breadth and depth of screening.

Transaction monitoring uses algorithms to identify unusual transactional patterns (for example as might be adopted by people convicted of crimes such as human trafficking) that require further investigation. With the new technology, HUB24 can use more advanced algorithms to detect suspicious transactions noise and increase the capacity for investigations.

POLICIES

Several policies are essential to operationalise our commitment and approach to modern slavery risk across our operations and supply chain:

Key focus area / Modern slavery risk exposure area

Our governance



Policies	Purpose
Risk Management Framework	This framework describes HUB24's approach to managing Material Risks. Key elements of the RMF include our Corporate Strategy and Business Plan, our Risk Appetite, and our approach to managing, monitoring, and responding to Material Risks.
Modern Slavery Framework	This framework sets out the programs, processes and tools we have in place to ensure compliance with the Modern Slavery Act. It also provides a consistent framework to effectively manage our ongoing modern slavery risks and enhances our management team's awareness and understanding of modern slavery risks.

Our approach

continued

Key focus area / Modern slavery risk exposure area



Our people

Policies	Purpose
Code of Conduct	Our standards and expectations of our company and people.
Leave Policies	Providing fair and equitable leave benefits including statutory leave benefits, parental leave, special paid leave, domestic violence leave etc.
Equal Opportunity & Anti-Harassment	Covering Bullying, harassment, sexual harassment etc.
Grievance Handling Policy	Our approach to fairly managing grievances.
Group Whistleblower Policy	Our standards and expectations for our people to confidentially raise issues.
Work Health & Safety (WHS) Policy	Our minimum standards for ensuring a safe work environment.

Key focus area / Modern slavery risk exposure area



Our operations, partners & customers

Policies	Purpose
Group Complaints Management Policy	Our approach to managing complaints across the HUB24 Group.
Group Anti-bribery & Corruption Policy	Our minimum standards for ensuring compliance with our anti-bribery & corruption obligations.
Group Sanctions Policy	Our minimum standards for ensuring compliance with our economic and trade sanctions obligations.
AML/CTF Program	Our approach to managing anti-money laundering, terrorist-financing and sanctions risk.
Investment Manager Governance & Oversight Framework	Our approach to managing risks associated with third-party investment managers including oversight.
Advice Licensee Governance Framework	Our approach to managing risks associated with advice licensees, including oversight.
Donations Policy	Our approach to ensuring our values and modern slavery risk management approach is reflected in our charitable donations.

Our approach

continued

Key focus area / Modern slavery risk exposure area

Our suppliers



Policies	Purpose
Group Outsourcing Policy	Our minimum standards for managing third party and associated compliance risks of outsourcing business activities.
Information Security Policy for Supplier Relationships	Our minimum standards for supplier security arrangements.

We otherwise manage our exposure to modern slavery risk in our supply chain through:

Risk Mitigant	Description
Centralised Supplier Register	We maintain a centralised supplier database to assist with the identification, monitoring and supervision of suppliers.
Supplier Screening and Due Diligence	We maintain supplier screening and due diligence processes for our material service providers/new suppliers prior to the signing of supplier agreements.
Procurement and purchasing	We maintain procedures for outsourcing and third-party vendor management.
Supplier Security Policy	Details the requirements that need to be met when engaging with Third Party Suppliers who are providing new systems, components, or services.
Group Technology sourcing	We have a specialist IT Procurement capability within our Group Technology division.
Commercial Manager Process	Each supplier is assigned a responsible Commercial Manager who manages the contractual relationship with the supplier.
Written contracts with suppliers	We enter formal contractual arrangements with our suppliers on terms that reflect the extent and nature of the services provided. Our contractual terms and conditions are aimed at strengthening supplier obligations in relation to modern slavery and require our suppliers to comply with Modern Slavery Laws, have reasonable measures in place to ensure compliance (including review of supplier's supply chains), and notify HUB24 of breaches of compliance.
Material Service Provider Relationship Management	Typically, a relationship manager is appointed to each material service provider, and we maintain monitoring and oversight arrangements over these providers.

REMEDIATION

We provide access to remedy, where appropriate, and we provide mechanisms through which grievances can be raised, including in relation to modern slavery.

When an issue is identified, we manage it through our Incident and Breach Management processes.

Assessing our effectiveness

Assessing the effectiveness of our actions is critical to driving continuous improvement in our approach to modern slavery risk.

Through our Risk Management Framework (which is integrated with our Seven ESG focus areas) we monitor and report to the HUB24 Sustainability Council and the HUB24 Board ARCC a range of indicators to assess the effectiveness of our approach to identifying, assessing, managing, mitigating, and reporting modern slavery risk.

Key indicators in relation to our Governance, and our three main areas of modern slavery risk exposure are summarised as:

Modern slavery risk exposure/focus area	Key Indicators	How we performed in FY23
Governance	<ul style="list-style-type: none"> HUB24 Board ARCC reporting regularly addresses modern slavery risk as covered by the HUB24 Group Risk Profile (see critical risk types at Section 03 of this Statement). HUB24 Sustainability Council reporting regularly addresses the HUB24 seven ESG focus areas as aligned in 2023 to the UN Sustainability Development Goals. Frameworks, policies, and process in place to manage sustainability risk, including human rights and modern slavery risks. Monitor regulatory developments. 	<ul style="list-style-type: none"> The Board approved a new risk taxonomy that more explicitly referenced human rights and modern slavery risk. Group risk profile reassessed and reported quarterly to ARCC, including heightened modern slavery exposures. The Sustainability Council met to monitor and track activities against ESG focus areas. Group Risk and Compliance commenced a refresh of the Group Policy Framework.
Our People	<ul style="list-style-type: none"> Mandatory e-learning all staff training % completion rates. Grievances raised through the Grievance Handling Policy. Reports of modern slavery through the Whistleblower Program. Progress against our ESG focus area of employee engagement. 	<ul style="list-style-type: none"> All employees completed mandatory training, which included references to Modern Slavery and financial crime. Nil grievances or whistleblower reports made in relation to modern slavery. HubEmpower Council established its operating rhythm and commenced advocacy for social enterprises across the Group. Launched a new Employee Assistance Program and Employee Recognition Program.
Our Operations, Partners, & Customers	<ul style="list-style-type: none"> Key financial crime processes including transaction monitoring, and country risk assessments. Reports of modern slavery through the incident & breach reporting program. Exceptions to advice Licensee periodic compliance attestations. Mandate compliance monitoring exceptions in relation to investment manager compliance with mandate (which may include ESG criteria and/or adherence to modern slavery reporting legislation). 	<ul style="list-style-type: none"> A new financial crime system was implemented to enhance our customer and transaction screening processes. Nil incidents relating to modern slavery raised. Modern Slavery questions were included in the AFS licensee attestation. We received a positive response of 97% to questions pertaining to Modern Slavery risk. Uplifted our incident management processes, allowing the linkage of incidents to modern slavery risks.
Our Suppliers	<ul style="list-style-type: none"> % Suppliers outside Australia/in higher risk sectors. % Exceptions identified via supplier due diligence/questionnaires. 	<ul style="list-style-type: none"> Continued to update our contractual terms with suppliers to include specific references requiring Modern Slavery compliance and the obligation to inform us of any modern slavery matters.

Continuous improvement

We aim to continuously review and enhance our approach to modern slavery risk. We have identified the following continuous improvement initiatives:

Modern Slavery risk exposure / focus area	Continuous improvement initiatives
Governance	<ul style="list-style-type: none"> Uplift modern slavery risk management reporting to the HUB24 Board ARCC.
Our People	<ul style="list-style-type: none"> Continue our commitment on engaging our people through regular feedback loops and action planning on areas to improve retention. Evolve our strategy and actions around diversity, equity inclusion, linked to our broader Sustainability and ESG agenda. Continued focus on fair remuneration benchmarking and gender pay gap analysis. Refresh our values to reflect our Group Culture and drive the behaviours that reinforce our commitment to integrity and good corporate governance. Continued focus on our workforce wellbeing to minimise and mitigate potential psychosocial hazards in our workplace and elevate the importance of mental and physical wellbeing. Investment in our talent and leadership to grow career and role model our expected behaviours.
Our Operations, Partners & Customers	<ul style="list-style-type: none"> Continue to refresh the Group Policy Framework, ensuring integration of risk management and business management policies. Further review and enhancement of our Grievance management processes. Monitoring of whistleblowing disclosures as per the Whistleblowing policy.
Our Suppliers	<ul style="list-style-type: none"> Review and investigate a group wide digital solution for our Supplier Register. Enhance our Supplier Register through integration with finance to capture supplier dollar spend data by geography. Establish threshold and assessment criteria for performing enhanced modern slavery risk assessment. Investigate and standardise the due diligence process for the onboarding of new suppliers for all entities in the Group (across our main supplier categories). Improve performance monitoring of all vendors across the group, including a risk-based overlay. Uplift the vendor management framework.

Consultation & approval

The HUB24 Group Chief Risk Officer supported by the HUB24 Group Risk & Compliance function led the preparation of this Statement.

The HUB24 Group Risk & Compliance function consulted cross-functionally in the preparation of this Statement, including with the HUB24 Group Executive team.

This Statement was approved by the HUB24 Limited Board Audit Risk and Compliance Committee on 14 November 2023. The Statement was tabled for noting at relevant Subsidiary Board Audit Risk and Compliance Committees.

Appendix 1 – Entities owned or controlled by HUB24

The subsidiaries of HUB24 during the FY23 included:

- HUB24 Custodial Services Limited ABN 94 073 633 664
- HUB24 Management Services Pty Ltd ABN 59 135 332 320
- HUBconnect Pty Ltd ABN 80 140 899 252
- Agility Applications Pty Ltd ABN 76 124 078 315
- Xplore Wealth Pty Limited ABN 34 128 316 441
- Class Pty Limited ABN 70 116 802 058
- Class Technology Pty Limited ABN 46 121 158 503
- NowInfinity Pty Ltd ABN 16 54 927 376
- myprosperity Pty Ltd ABN 40 149 786 489

Please refer to Page 74 of the HUB24 Annual Report year ending 30 June 2023 for further details of the owned and controlled entities within the HUB24 Group.

Appendix 2 – Mandatory criteria reference table

The table below provides reference pages for the relevant disclosures in each criterion for the *Modern Slavery Act 2018* (Cth).

Modern Slavery Act (Cth) Mandatory Criteria	HUB24 Statement section reference	Page
Section 16(1)(a) Identify the reporting entity	Introduction	1
Section 16 (1)(b) Describe the structure, operations, and supply chains of the reporting entity	Our structure, operations, and supply chains	2
Section 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	Our Approach	7
Section 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	Our Approach Our Progress in FY23	7 5
Section 16(1)(e) Describe how the reporting entity assesses the effectiveness of such actions	Assessing the effectiveness of our actions	15
Section 16(1)(f) Describe the process of consultation with any entities that the reporting entity owns or controls. In the case of a reporting entity covered by a statement under section 14 – the entity giving the statement	Consultation & approval	16
Section 16(1)(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Continuous improvement	16

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