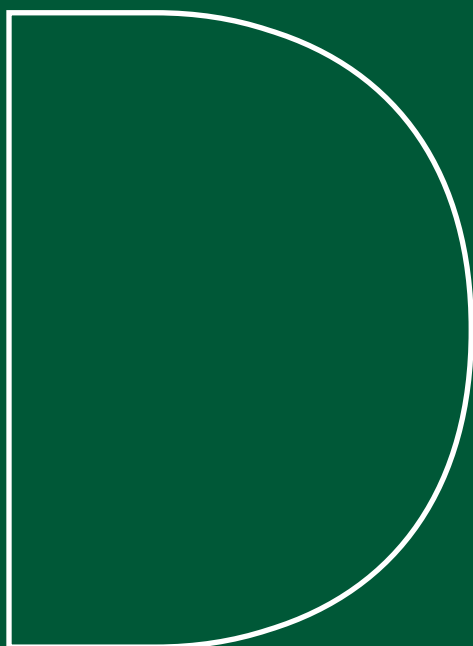


Domain  
Group

# Modern Slavery Statement 2024



Domain Holdings Australia Limited  
ABN 43 094 154 364



# Domain Group

# Modern Slavery Statement 2024

## 1. Introduction

### This Statement

This Modern Slavery Statement (**Statement**) is made by Domain Holdings Australia Limited ABN 43 094 154 364 (**Domain**) and covers Domain and its controlled entities as at 30 June 2024 (**Domain Group**). The members of the Domain Group are listed in the schedule to this Statement.

This Statement is Domain's Modern Slavery Statement pursuant to the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

The purpose of this Statement is to outline the Domain Group's approach to ensuring that its business is conducted within a framework that minimises modern slavery risks in its operations and supply chains.

### Reporting entity

The reporting entity for the purposes of this Statement is Domain.

This Statement covers the Domain Group. Except where noted otherwise in this Statement, arrangements referred to as those of the Domain Group are applicable to all members of the Domain Group.

### Reporting period

This Statement covers the reporting period from 1 July 2023 to 30 June 2024 (**Reporting Period** or **FY24**).

## 2. The Domain Group's Commitment to Human Rights

Domain recognises that freedom from slavery and servitude is a fundamental human right. Domain Group is committed to conducting its business in a manner that respects and supports human rights, including the human rights of those involved in its operations and supply chains. Domain Group's commitment to upholding human rights is informed by the United Nations (**UN**) Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights and the UN Global Compact and has been documented in Domain's Human Rights Policy, available at Domain's Shareholder Centre website at [shareholders.domain.com.au](https://shareholders.domain.com.au). Domain's expectations of the Domain Group's suppliers are documented in Domain Group's Supplier Code of Conduct, which is also available at [shareholders.domain.com.au](https://shareholders.domain.com.au).

Domain recognises that modern slavery takes a number of different forms that may be characterised by the presence of the use of coercion, threats or deception to exploit victims and deprive them of their freedom. Examples of modern slavery include human trafficking, forced labour, debt bondage, forced marriage and the worst forms of child labour, as well as more traditional forms of slavery and servitude (where powers relating to the right of 'ownership' are exercised with respect to human beings).

Domain is aware that the risks of modern slavery are significant for many people and communities around the world. Modern slavery occurs in Australia, and is prevalent in some other jurisdictions that are major exporters of goods and services to Australia. Domain recognises that given the international components of its operations and supply chain, it has the ability to impact and influence the human rights of workers around the world by holding itself and its suppliers to human rights standards.

Domain Group conducts its operations in a manner that respects the human rights of its workers, in accordance with its Human Rights Policy. Domain Group also expects its suppliers to comply with the human rights standards articulated in the Domain Group Supplier Code of Conduct.

Both policies are available at [shareholders.domain.com.au](https://shareholders.domain.com.au).

### 3. Structure of the Domain Group

Domain is a public company registered under the *Corporations Act 2001* (Cth) (**Corporations Act**) and listed on the Australian Securities Exchange (ASX:DHG).

Domain's registered office is located at Level 5, 100 Harris Street, Pyrmont, New South Wales 2009.

Domain's largest shareholder is Nine Entertainment Co. Holdings Limited (ASX:NEC), with a 60.05% shareholding as at 30 June 2024.

The members of the Domain Group as at the end of the Reporting Period were Domain and its controlled entities listed in the schedule to this Statement. For part of the Reporting Period, the Domain Group included two joint venture entities – Domain Insure Pty Ltd (ABN 19 619 826 096) and Digital Home Loans Pty Limited (ABN 39 619 694 156) (**Divested Joint Venture Entities**). Domain's interests in both joint ventures were divested during the Reporting Period. All but two of the members of the Domain Group are companies incorporated in Australia. The two foreign entities in the Domain Group are Campaigntrack Limited (incorporated in New Zealand) and Realbase Inc. (incorporated in the Philippines).

Domain Group is headquartered in Sydney, with additional offices in Melbourne, Canberra, Brisbane, Perth, Adelaide and the Philippines. Domain also has employees based in New Zealand.

As at 30 June 2024, the Domain Group had approximately 1087 employees, the majority of which were ordinarily based in Australia.

### 4. Governance relating to Modern Slavery

Domain's Board of Directors is ultimately responsible for the corporate governance of the Domain Group. Details of the Board's responsibilities are set out in the Board's Charter, which is available on Domain's shareholder website, [shareholders.domain.com.au](https://shareholders.domain.com.au).

The Board has delegated specific responsibilities for managing and overseeing modern slavery risks, and opportunities for continual improvement, to two Board subcommittees – the Audit & Risk Committee (**ARC**) and the People, Culture & Sustainability Committee (**PCSC**).

Broadly speaking, the ARC is responsible for monitoring and overseeing the controls on risk generally, including supply chain and human rights risks; and the PCSC is responsible for overseeing Domain Group's employment and outsourced labour hire practices, as well as the development of policies and procedures for ensuring Domain Group's operations are managed in compliance with applicable labour laws and human rights standards. The ARC is also involved in reviewing and approving Domain's annual plans to identify and manage modern slavery risks and to improve Domain Group's posture in this area, receives periodic updates from Management on matters relating to Domain Group's supply chain management program and provides updates to the Board. In addition, the ARC reviews and submits Domain Group's annual Modern Slavery Statement to the Board for approval as required by the Modern Slavery Act. Further details of the ARC's and PCSC's respective responsibilities are set out in their Charters, which are available on Domain's shareholder website, [shareholders.domain.com.au](https://shareholders.domain.com.au).

At a Management level, during the Reporting Period, Domain Group's Modern Slavery Statement Committee (**MSS Committee**), described in Domain's Modern Slavery Statement for the reporting period ended 30 June 2023, was reformed into a Supply Chain Oversight Committee (**Supply Chain Oversight Committee**) with a broader ambit than the MSS Committee had previously.

The Supply Chain Oversight Committee has ultimate Management-level accountability for ensuring that Domain Group's supply chain risk management program is implemented and appropriately managed, and for ensuring that the ARC and PCSC receive the reporting and oversight they require in order to effectively discharge their duties pertaining to modern slavery. The Supply Chain Oversight Committee is supported by a Supply Chain Oversight Working Group (**Working Group**) comprising members of Domain Group's Legal, Procurement, Finance, People Experience and ESG teams, who carry out relevant day-to-day operational activities such as supply chain mapping, conducting modern slavery risk assessments, communicating Domain Group's human rights expectations to suppliers and maintaining appropriate records. Consistent with Domain Group's 'continuous improvement' approach to the management of modern slavery risks, the Working Group is also responsible for developing new strategies to improve Domain Group's anti-modern slavery posture and proposing such strategies to the Supply Chain Oversight Committee for escalation to the ARC, PCSC and/or Board as appropriate.

## 5. Operations of the Domain Group

Domain Group is a leading property technology and services business that is home to one of the largest portfolios of property brands in Australia. Domain's purpose is to inspire confidence in life's property decisions. Domain Group achieves this through addressing the challenges facing consumers, agents, developers, governments and financial institutions via a suite of tools spanning the four components of Domain's Marketplace model:

- Core Listings;
- Agent Solutions;
- Domain Insight; and
- Consumer Solutions.

**Core Listings** connects agents and corporates with Domain's high quality, engaged audiences across web, mobile, print and social platforms. The business comprises:

- the residential and developer listings sites Domain and Allhomes, each offering a portal for residential property listings and advertising;
- Commercial Real Estate (CRE), offering a portal for commercial property listings and advertising; and
- Domain Media, which provides display advertising and marketing opportunities for brands and corporations.

**Agent Solutions'** digital workflow tools are designed to inspire confidence at each step of the agent property journey, and help agents build profitable and sustainable businesses. Domain's Agent Solutions include Pricerfinder, Realbase, Real Time Agent and LeadScope.

**Domain Insight** leverages Domain's broad property ecosystem to provide high quality property data, insights and data platforms to consumers, agents, government, financial institutions and other corporates. Products in this vertical include property research platform Pricerfinder, Domain Insight's Automated Valuation Model, Insight Data Solutions, and Domain's proprietary predictive models.

**Consumer Solutions** is building direct-to-consumer services to inspire confidence at every stage of the consumer property journey.

## 6. Supply Chains of the Domain Group

The Domain Group's supply chain consists of a range of suppliers of goods, products and services, predominantly in the following industries:

- cloud and software services;
- advertising and media including media agencies, advertising platforms and social media platforms;
- IT hardware and telecommunications;
- print services and distribution;
- data and information services;
- outsourced labour services;
- professional services such as legal, investment banking, tax, accounting and recruitment; and
- building services and office equipment.

The Domain Group's material suppliers (determined by value of expenditure) are mainly based in Australia, the United States of America, Ireland, the United Kingdom, New Zealand and Singapore, all of which are jurisdictions which are rated low for prevalence of modern slavery practices in the Global Slavery Index.<sup>1</sup>

A small number of material suppliers are located in other jurisdictions that are rated higher for prevalence of modern slavery practices, including the Philippines and India.

The supply chains of the Divested Joint Venture Entities described in part 3 of this Statement were substantially similar to those of the Domain Group.

<sup>1</sup> Walk Free 2023, Global Slavery Index 2023, Minderoo Foundation. Available from: [www.walkfree.org/global-slavery-index](http://www.walkfree.org/global-slavery-index) (**Walk Free Global Slavery Index 2023**).

## 7. Overall Risk Assessment for Reporting Period

Having undertaken an assessment of the modern slavery risks in Domain Group's operations and supply chains, Domain considers its overall risk level for the Reporting Period to have been low.

**Operations:** Domain Group's operations are primarily conducted by skilled professionals working in Australia, New Zealand and the Philippines. Wherever they are located, Domain Group employees are managed and supported through a centralised Domain Group People Experience team, supported by employment policies and practices that are underpinned by a respect for the universal human rights of workers. Domain recognises that the Philippines is a higher risk jurisdiction than Australia and New Zealand, being ranked the 36<sup>th</sup> highest prevalence country for modern slavery risks globally out of 160 countries, compared to Australia and New Zealand which rank #149 and #148 respectively.<sup>2</sup> However, Domain took a range of steps in the Reporting Period to actively monitor for modern slavery risks in its Philippines operations and none were detected. Further details of the steps taken during the Reporting Period to monitor for relevant risks are provided in section 9 of this Statement under "Maintaining an offshore workforce in the Philippines".

**Supply Chains:** In respect of the Reporting Period, Domain conducted modern slavery risk assessments of 262 FY24 suppliers to the Domain Group, accounting for 90% of expenditure across the Domain Group over the Reporting Period. The methodology that was applied was consistent with that applied in previous reporting periods and is described in greater detail in section 8 of this Statement. Having conducted the review, Domain did not identify any incidences of high modern slavery risk in its supply chain. In addition, the majority of material suppliers to the Domain Group were assessed as presenting low risk. Further details are available in section 8 of this Statement under "Supply Chain Mapping and Assessments".

## 8. Actions and Procedures Undertaken in Reporting Period to Assess and Address Modern Slavery Risks

At a high level, Domain's supply chain risk management program for the Reporting Period, across the Domain Group, comprised:

- **Supply Chain Mapping and Assessments:** Assessing suppliers for modern slavery risks;
- **Policy Framework:** Having and enforcing appropriate policies in order to ensure Domain Group's direct operations are conducted in accordance with human rights standards;
- **Setting Clear Supplier Expectations:** Clearly conveying Domain's human rights standards to suppliers and reinforcing those expectations at regular intervals;
- **Training and Awareness:** Ensuring that Domain Group staff and suppliers are aware of Domain's commitments to upholding human rights standards and are empowered to raise concerns, should they arise;
- **Escalation Mechanisms:** Maintaining effective communication channels to ensure that staff and suppliers have the means to raise concerns and that those concerns are appropriately escalated and managed; and
- **Continuous Improvement Measures:** Reflecting on the effectiveness of initiatives, identifying opportunities for improvement in Domain's supply chain management program and developing specific strategies for implementation.

A description of the Domain Group's activities during the Reporting Period in each of these areas is provided below.

### Supply Chain Mapping and Assessments

During the Reporting Period, Domain maintained its previously reported process of reviewing material suppliers in the Domain Group's supply chain. The purpose of this review was to enable Domain to identify and monitor risks of modern slavery in the Domain Group's supply chain. As in the previous reporting period, materiality was measured by value of expenditure and the review determined supplier risk levels with reference to factors such as:

- the supplier's country of registration;
- the types of services performed and their industry;
- whether the supplier has a published modern slavery statement (or otherwise has published information in relation to modern slavery risks in its supply chains); and
- other readily available public information and information provided by the supplier.

During the Reporting Period, reviews were conducted with respect to:

- 262 suppliers that collectively represented approximately 90% of the procurement expense of the Domain Group; and
- suppliers categorised as potentially having a higher modern slavery risk (due to their geographical locations, for example).

<sup>2</sup> Walk Free Global Slavery Index 2023.

Applying the above risk assessment framework, Domain identified that:

- no material suppliers to the Domain Group were 'high risk';
- 108 material suppliers were 'medium risk'; and
- the majority of material suppliers were 'low risk'.

### Policy Framework

Throughout the Reporting Period, the Domain Group had a range of formal policies in place that promote ethical and legal business conduct, both internally and within its supply chains, including Domain's:

- Human Rights Policy;
- Code of Conduct;
- Speak Up (whistleblower) Policy;
- Anti-Bribery and Corruption Policy; and
- Supplier Code of Conduct.

The Human Rights Policy, Code of Conduct, Speak Up and Anti-Bribery and Corruption Policies relate to Domain Group's operations and are applicable to all Domain Group Directors, employees and contractors, among others.

The Supplier Code of Conduct applies to Domain Group's supply chain, and sets out minimum standards that the Domain Group expects of its suppliers.

Copies of these policies are available at Domain's Shareholder Centre website at [shareholders.domain.com.au](http://shareholders.domain.com.au). The policies that apply to Domain Group staff are also available on Domain Group's staff intranet for ease of reference and the Supplier Code of Conduct is communicated to new suppliers prior to onboarding and reinforced by follow up communications at regular intervals (see "Settling Clear Supplier Expectations" below for further information).

During the Reporting Period, all relevant policies were reviewed by Management to determine whether changes were required in order to improve Domain's supply chain risk management posture. The review resulted in the ARC and the Domain Board approving updates to the Supplier Code of Conduct. Among other things, the updates aim to drive positive change for the benefit of workers in Domain Group's indirect supply chain by requiring direct suppliers to:

- take active steps to monitor and manage modern slavery risks in their own operations and supply chains;
- maintain effective grievance mechanisms to enable their stakeholders to raise concerns; and
- report incidents to Domain with promptness and transparency.

The updated Supplier Code of Conduct was adopted by the Board on 21 May 2024 and communicated to all Suppliers on 1 June 2024.

### Setting Clear Supplier Expectations

As noted above, Domain's Supplier Code of Conduct sets out the minimum standards that the Domain Group expects of its suppliers. As explained above under "Policy Framework", those minimum standards were increased during the Reporting Period in an effort to drive better outcomes through Domain Group's indirect supply chain.

Domain communicates and reinforces its expectations that suppliers to the Domain Group comply with the Supplier Code of Conduct in a number of ways.

- **Onboarding:** The majority of Domain Group's suppliers are directly engaged by Domain or one of its wholly owned subsidiaries and onboarded using a centralised vendor management system (**VMS**). These suppliers were provided with the Supplier Code of Conduct and asked to positively acknowledge and agree to the terms of the Supplier Code of Conduct as a condition of onboarding to the VMS. A small number of Domain's wholly owned subsidiaries are not currently using Domain's centralised VMS. Suppliers to these entities were notified of the Supplier Code of Conduct as part of onboarding and were asked to contact Domain Group if they had concerns regarding their ability to comply with it. Across Domain and its wholly owned entities, where a supplier rejected or raised concerns about its ability to comply with the Supplier Code of Conduct, Domain contacted the supplier to assess their specific concerns and assess whether they were an appropriate supplier for Domain Group.
- **Procedures for non-wholly owned joint venture entities:** While the Divested Joint Venture Entities were part of the Domain Group, Domain worked with its joint venture partners to ensure suppliers to the joint ventures were provided with the Supplier Code of Conduct.

- **Regular reinforcement:** In addition to providing suppliers with the Supplier Code of Conduct during the onboarding process, at regular intervals (approximately every six months) Domain Group reminds suppliers of the expectation that they comply with it. In these communications, Domain reminds suppliers to read and familiarise themselves with the Supplier Code of Conduct and requires them to contact Domain Group if they have any concerns or are unable to comply with it for any reason.

## Training and Awareness

During the Reporting Period, Domain continued its efforts to provide training and raise awareness among the Domain Group workforce and its supply chain of the importance of combating modern slavery. For example:

- Domain's supply chain risk management program and the mechanisms for raising relevant concerns were a subject of a business-wide All Hands meeting and were covered in broadly distributed internal communications;
- members of Domain's Working Group undertook training and research on a range of industry approaches to monitoring and addressing modern slavery risks, applied those learnings within their roles in the Working Group and cascaded their knowledge within their respective functions (where relevant); and
- Domain amended its Supplier Code of Conduct to expressly require Domain Group's direct suppliers to ensure that their personnel who are responsible for monitoring modern slavery risks are appropriately trained.

## Grievance Mechanisms & Engagement Monitoring

Throughout the Reporting Period, Domain maintained a range of grievance mechanisms to ensure that people involved in its operations and supply chain had access to appropriate channels to be able to communicate any concerns regarding modern slavery risks (among other issues) and that any identified incidents would be escalated and remediated.

These mechanisms included:

- maintaining and monitoring the [supplychain@domain.com.au](mailto:supplychain@domain.com.au) email address, which is highlighted in the Supplier Code of Conduct as a pathway for suppliers to raise their concerns; and
- Domain's whistleblower policy, referred to as the "Speak Up Policy". The Speak Up Policy, including details of the Speak Up Hotline, Domain's whistleblower hotline, is available at Domain's Shareholder Centre website at [shareholders.domain.com.au](http://shareholders.domain.com.au). The Speak Up Hotline is a confidential, independent, externally managed hotline which enables whistleblowing reports to be made, including on an anonymous basis if preferred. It is referenced in the Code of Conduct and the Supplier Code of Conduct as a means by which staff and suppliers can raise complaints and concerns regarding unethical conduct in a confidential manner.

In addition to monitoring and managing grievances, Domain proactively undertakes employee engagement monitoring every six months. Among other things, all staff are encouraged to complete an anonymous Domain Group-wide engagement survey, the results of which assist Domain to gauge whether the Domain Group's operations are conducted in a manner that is supportive of the rights and dignity of its workers. Engagement surveys include questions regarding the perceived fairness of working conditions, including the availability of appropriate levels of flexibility and autonomy, as well as free text sections in which employees can anonymously raise their views and concerns. Domain actively seeks to manage any complaints or concerns raised in engagement surveys.



## Continuous Improvement Measures

During the Reporting Period, Domain undertook a comprehensive review of its supply chain governance and risk assessment processes and developed a range of strategies to improve Domain Group's posture going forward.

The measures undertaken during the Reporting Period are summarised below.

- **Governance enhancements:** The Working Group undertook a holistic governance review and implemented a range of incremental improvements, including:
  - developing and adopting an internal charter for the Supply Chain Oversight Committee to clearly articulate its roles and responsibilities, and the matters delegated to the Working Group;
  - refreshing the membership of the Supply Chain Oversight Committee and the Working Group to ensure all functional areas with responsibility for parts of Domain's supply chain risk management program are represented and accountabilities are clear;
  - appointing a Chair and a Secretary to each of the Supply Chain Oversight Committee and the Working Group to support the governance, administration and record keeping practices of those bodies;
  - reviewing the cadence for reporting on modern slavery risks and opportunities to the Board, ARC and PCSC;
  - reviewing all relevant Domain Group policies from a modern slavery risk perspective; and
  - developing a formal annual calendar of activities to assist in better coordinating the various parts of Domain's supply chain risk management program.

- **Development of new risk screening processes:** During the Reporting Period, the Working Group developed a new procedure for screening for modern slavery risks in Domain Group's supply chain (**Assessment Matrix**). The new Assessment Matrix was approved by the Supply Chain Oversight Committee during the Reporting Period and will be trialled during the reporting period commencing 1 July 2024.

Under the new Assessment Matrix, Domain Group staff will be required to undertake a modern slavery risk assessment in respect of all proposed procurement activity. Where the initial risk assessment indicates that certain risk factors are present (for example, that the goods are of a sort that are generally associated with elevated modern slavery risk, such as textiles), staff will be required to make the purchase from a supplier that is on a shortlist of pre-diligenced suppliers (**Approved Suppliers**), or to submit the proposed purchase to the Working Group for review and approval. The Working Group will undertake detailed due diligence prior to determining whether the purchase can proceed or whether an alternative, lower-risk supplier should be identified and engaged.

The Working Group will consider a range of factors in clearing suppliers for the Approved Supplier list or approving purchases from suppliers who are not on that list. Relevant considerations will include whether the supply is of a sort that involves significant direct or indirect supply chain risks of modern slavery (for example, supplies of clothing and information technology hardware), geographic prevalence information, the supplier's willingness to positively confirm its acceptance of the Supplier Code of Conduct, the supplier's own modern slavery reporting and monitoring practices, whether the supply is an essential or discretionary business requirement, and the availability and accessibility of alternative suppliers with lower risk profiles.

- **Identifying and mitigating process departures:** During the Reporting Period, there was one instance in which branded merchandise was acquired without first being assessed through Domain's usual enhanced risk assessment process for "Elevated Risk Goods" (as defined in section 9 of this Statement). The enhanced process is described in section 9 of this Statement under "Purchasing Elevated Risk Goods". That departure from proper process was a result of human error. The Working Group was made aware of the issue and is in the process of implementing controls which are expected to limit the potential for recurrence, including by designing an automated risk assessment workflow which, when implemented, will include modern slavery risk assessments as a mandatory threshold step in Domain Group's procurement process.



## 9. Identifying Risks and Taking Action to Mitigate them

Notwithstanding that Domain considers the Domain Group to have had an overall low level of exposure to modern slavery risks over the Reporting Period, Domain has identified and considers the following risks to be the key modern slavery risks in the Domain Group's operations and supply chain and has implemented the measures detailed below to monitor and manage those risks.

Risk	Measures implemented during Reporting Period
<p><b>Maintaining an offshore workforce in the Philippines</b></p> <p>While the majority of Domain Group staff are located in Australia and a small number are located in New Zealand (which are low risk jurisdictions for modern slavery<sup>3</sup>), Domain Group maintains an offshore workforce in the Philippines, which is a relatively higher-risk jurisdiction.<sup>4</sup></p>	<ul style="list-style-type: none"> <li>• <b>Screening and benchmarking:</b> Domain has implemented and maintained a range of processes and procedures to ensure that all Domain Group employees in the Philippines have legal rights to work, are over the age of 18 and are paid fair wages.</li> <li>• <b>Local legal counsel retainer:</b> Domain Group has a retainer with a local law firm in the Philippines to perform a range of tasks such as providing advice on local labour laws and reviewing employment contracts for compliance with applicable legal standards.</li> <li>• <b>Centralised group-wide administration:</b> Employment practices in the Philippines are closely monitored by Domain Group's centralised People Experience team and conducted in compliance with local labour laws and applicable human rights standards.</li> <li>• <b>Site visits:</b> During the Reporting Period, senior staff from Domain Group's Australian offices attended the Philippines office and confirmed on the basis of their inspections that employment practices in the Philippines appear to be appropriate and aligned with Domain Group's standards.</li> <li>• <b>Monitoring for grievances:</b> As noted above, Domain has maintained a range of employee engagement monitoring and grievance reporting mechanisms which are available to all Domain Group staff, including employees in the Philippines. There were no complaints raised during the Reporting Period regarding modern slavery risk in Domain Group's Philippines operations.</li> </ul>
<p><b>Outsourced labour hire</b></p> <p>Domain periodically uses outsourcing arrangements for a small amount of technology and product work. Domain acknowledges that outsourced labour hire arrangements present risks, and that these risks may be less visible to Domain than if the relevant workers were directly employed by Domain Group.</p>	<ul style="list-style-type: none"> <li>• <b>Screening:</b> In acquiring outsourced labour hire services, Domain undertakes a variety of steps to ensure that the supplier is reputable and will provide a safe environment for its labour force. The specific steps taken vary from engagement to engagement depending on the circumstances and geographic location. At a minimum, the screening process includes the supplier being provided with the Supplier Code of Conduct every six months and being asked on each occasion to contact Domain if they have any concerns about their ability or willingness to comply with it. No such concerns were raised by Domain's outsourced labour hire partners during the Reporting Period.</li> </ul>
<p><b>Purchasing Elevated Risk Goods</b></p> <p>As with most technology and technology-reliant businesses, Domain Group's supply chain includes information technology hardware such as computers, television screens, tablets and mobile phones.</p> <p>Domain Group also acquires small amounts of coffee, cocoa, office equipment and branded merchandise.</p> <p>These goods have been identified by Walk Free as being imports that are at risk of being produced under conditions of modern slavery.<sup>5</sup></p> <p>In this Statement, these goods are referred to as "<b>Elevated Risk Goods</b>".</p>	<ul style="list-style-type: none"> <li>• <b>Review of Modern Slavery Statements from suppliers of Elevated Risk Goods:</b> During the Reporting Period, members of the Working Group reviewed the Modern Slavery Statements of a range of Domain Group's suppliers of Elevated Risk Goods in order to determine the extent to which such suppliers are monitoring and addressing modern slavery risks in their own supply chains. This has assisted Domain in developing a more nuanced view of Domain Group's indirect supply chain risks.</li> <li>• <b>Threshold screening for certain Elevated Risk Goods:</b> Where Domain Group proposes to purchase clothing or branded merchandise, a special committee has been created to undertake initial checks of the proposed supplier before the supplier proceeds to the centralised supplier assessment process.</li> <li>• <b>Risk Assessment:</b> During the Reporting Period, suppliers of Elevated Risk Goods were subjected to Domain's usual modern slavery risk assessment processes (described in Section 8 above under "Supply Chain Mapping and Assessments"). On screening, none were identified as being high risk for modern slavery. In addition, none declined the Supplier Code of Conduct or raised any concerns regarding their ability to comply with it.</li> </ul>

<sup>3</sup> According to the Walk Free Global Slavery Index 2023.

<sup>4</sup> According to the Walk Free Global Slavery Index 2023.

<sup>5</sup> Walk Free country study, Australia. Available from: [www.walkfree.org/global-slavery-index/country-studies/australia;](http://www.walkfree.org/global-slavery-index/country-studies/australia;) [www.walkfree.org/global-slavery-index/methodology/methodology-content/#g20-imports](http://www.walkfree.org/global-slavery-index/methodology/methodology-content/#g20-imports)

## 10. Assessment of Effectiveness of Actions

Domain is committed to testing the effectiveness of its processes to identify opportunities for enhancement and drive positive change. This commitment to continual improvement in effectiveness is reflected in the “Continuous Improvement Measures” described above in section 8 of this Statement.

During the Reporting Period, Domain assessed the effectiveness of its supply chain risk management program through:

- **Dialogue with and ongoing monitoring of suppliers:** Domain Group maintains an ongoing dialogue with its suppliers on modern slavery, including through reviewing material suppliers every six months. These monitoring activities enable Domain to determine whether its existing practices remain effective in maintaining an ethical supply chain.
- **Whistleblowing and employee engagement monitoring:** Domain’s practices of continually monitoring whistleblowing complaints and employee engagement enable Domain to ensure that employees and members of the Domain Group supply chain are empowered to raise concerns and identify any areas for improvement in the effectiveness of Domain’s supply chain risk management program. During the Reporting Period, no complaints of modern slavery practices were raised through these channels.
- **Reviewing own practices:** During the Reporting Period, the Working Group undertook a thorough review of Domain’s supply chain oversight processes. This review resulted in a range of governance improvements and the development of the new Assessment Matrix that Domain Group will trial during the reporting period commencing 1 July 2024. Further details of the resulting process improvements are provided above in section 8 of this Statement under “Continuous Improvement Measures”.
- **Reviewing alternative practices:** During the Reporting Period, members of the Working Group attended modern slavery training, reviewed other organisations’ Modern Slavery Statements and considered the due diligence methodologies employed by other businesses. This review assisted the Working Group to identify strategies to improve the effectiveness of Domain’s processes.
- **Standing agenda items:** An assessment of the effectiveness of past actions is a standing agenda item for Working Group meetings. This agenda item provides an opportunity for the Working Group to identify inefficiencies, bottlenecks or gaps in their processes and build strategies to address them.

## 11. Process of Consultation with Owned or Controlled Entities

This Statement has been made in consultation with and on behalf of all members of Domain Group.

The members of the Domain Group – many of which do not have physical operations, assets or employees – are subject to the same policies as Domain and have Domain-nominated Directors on their Boards. Domain Group members use the same centralised Purchasing, Procurement, Treasury and Finance teams for onboarding any material suppliers, and use the same centralised Domain People Experience team for managing and supporting personnel. Those centralised functions, in turn, report to Domain Management. As part of its consultation process with Domain Group controlled entities, Domain has engaged with the Directors on subsidiary Boards, the centralised functional teams and the members of Domain Management that they report to.

For part of the Reporting Period, the Domain Group included the Divested Joint Venture Entities. While those entities were controlled by Domain, Domain’s joint venture partners had performed certain corporate head office functions for the Divested Joint Venture Entities, including managing some of their suppliers. Where the Divested Joint Venture Entities did not use Domain’s centralised functions for supplier arrangements, members of the Working Group liaised with the relevant joint venture partners to ensure that critical actions and processes described in this Statement were performed, such as regularly reminding Domain Group suppliers of the Supplier Code of Conduct.

Domain considers that it has undertaken an effective consultation process that reflects the relationship between the members of the Domain Group, and has effective oversight of the Domain Group’s activities, people and supply chains. The Company Secretary of Domain, who is also the Company Secretary of almost all members of the Domain Group, has participated in the process of preparing this Statement.

## 12. Other Relevant Information

### a. Mandatory criteria under the Modern Slavery Act

Under the Modern Slavery Act, a Modern Slavery Statement must address seven mandatory criteria. Those criteria are set out in section 16 of the Modern Slavery Act. The table below sets out where each criterion is addressed in this Statement.

Criterion	Section of Modern Slavery Act	Relevant section(s) of this Statement
Identify the reporting entity.	Section 16(1)(a)	Section 1 ( <i>Introduction</i> )
Describe the structure, operations and supply chains of the reporting entity.	Section 16(1)(b)	Section 3 ( <i>Structure of the Domain Group</i> ) Section 5 ( <i>Operations of the Domain Group</i> ) Section 6 ( <i>Supply Chains of the Domain Group</i> )
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.	Section 16(1)(c)	Section 7 ( <i>Overall Risk Assessment for Reporting Period</i> ) Section 9 ( <i>Identifying Risks and Taking Action to Mitigate them</i> )
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.	Section 16(1)(d)	Section 8 ( <i>Actions and Procedures Undertaken in Reporting Period to Assess and Address Modern Slavery Risks</i> ) Section 9 ( <i>Identifying Risks and Taking Action to Mitigate them</i> )
Describe how the reporting entity assesses the effectiveness of such actions.	Section 16(1)(e)	Section 10 ( <i>Assessment of Effectiveness of Actions</i> )
Describe the process of consultation with any entities that the reporting entity owns or controls.	Section 16(1)(f)	Section 11 ( <i>Process of Consultation with Owned or Controlled Entities</i> )
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Section 16(1)(g)	Section 12 ( <i>Other Relevant Information</i> )

## b. FY25 Priorities and actions

The following is a summary of some of the key priorities and actions Domain intends to focus on in the reporting period commencing 1 July 2024:

- implementing the Assessment Matrix described in section 8 of this Statement;
- reviewing the effectiveness of the Assessment Matrix and considering whether changes are required for the FY26 reporting period (commencing 1 July 2025); and
- commencing the rollout of a digital workflow to include modern slavery risk assessments as gateway steps for Domain Group's procurement activities.

## 13. Approval of this Statement by Principal Governing Body of Reporting Entity

This Statement has been approved by Domain's Board of Directors in their capacity as the principal governing body of Domain on 16 August 2024.

## 14. Signature

This Statement is signed by Jason Pellegrino in his role as Chief Executive Officer and Managing Director of Domain on 16 August 2024.



**Jason Pellegrino**  
CEO and Managing Director of Domain  
16 August 2024

# Schedule – Domain Group members

as at 30 June 2024

Group member name	Country of incorporation	ABN / ACN
Domain Holdings Australia Limited	Australia	43 094 154 364
Alldata Australia Pty Ltd	Australia	44 144 020 744
All Homes Pty Limited	Australia	50 093 012 652
Australian Capital Territory Real Estate Media Pty Limited*	Australia	12 602 692 491
Australian Property Monitors Pty Limited	Australia	42 061 438 006
BH Two Pty Ltd	Australia	623 388 723
Bidtracker (NSW) Pty Ltd*	Australia	75 632 740 955
Bidtracker (VIC) Pty Ltd	Australia	85 611 220 823
Bidtracker Holdings Pty Ltd	Australia	35 620 961 702
Bidtracker IP Pty Ltd*	Australia	623 914 830
Campaigntrack Limited	New Zealand	–
Campaigntrack Pty Ltd	Australia	93 142 537 988
Commercial Real Estate Holdings Pty Limited	Australia	66 605 826 677
Commercial Real Estate Media Nominees Pty Limited	Australia	68 602 681 818
Commercial Real Estate Media Pty Limited	Australia	74 602 679 863
Commercialview.com.au Pty Limited	Australia	84 159 552 771
Domain Group Finance Pty Limited	Australia	89 619 554 602
Domain Operations Pty Limited	Australia	21 617 803 460
Homepass Australia Pty Ltd	Australia	16 602 046 480
Homepass Pty Ltd	Australia	90 600 128 327
IDS Gov Services Pty. Ltd.	Australia	47 629 959 333
Insight Data Solutions Holdings Pty. Ltd.	Australia	21 165 379 644
Insight Data Solutions Pty Ltd	Australia	35 151 319 694
MarketNow Payments Pty Ltd	Australia	68 645 651 967
Metro Media Publishing Pty Ltd	Australia	29 141 396 741
Metro Media Services Pty Ltd	Australia	16 160 994 212
MMP (CGE) Pty Ltd	Australia	76 159 660 465
MMP (DVH) Pty Ltd	Australia	83 144 821 269
MMP (Melbourne Times) Pty Ltd	Australia	99 159 873 668
MMP Bayside Pty Ltd	Australia	66 159 319 847
MMP Community Network Pty Ltd*	Australia	92 007 412 008
MMP Eastern Pty Ltd	Australia	97 159 661 364
MMP Greater Geelong Pty Ltd	Australia	90 159 938 806
MMP Holdings Pty Ltd	Australia	24 141 277 643
MMP Moonee Valley Pty Ltd	Australia	89 159 873 186
National Real Estate Media Pty Limited	Australia	56 602 439 574
National Real Estate Media Nominees Pty Limited	Australia	60 602 439 592
New South Wales Real Estate Media Pty Limited	Australia	12 602 713 913

Group member name	Country of incorporation	ABN / ACN
Northern Territory Real Estate Media Pty Limited	Australia	14 602 713 922
Property Data Solutions (2) Pty Ltd	Australia	41 650 393 516
Property Data Solutions Pty Ltd	Australia	50 110 242 129
Queensland Real Estate Media Pty Limited	Australia	39 602 734 716
Realbase Inc.	Philippines	–
Realbase Pty Ltd	Australia	92 645 511 422
Realhub Services Pty Ltd	Australia	80 119 877 333
Realhub Studios Pty Ltd	Australia	60 621 531 217
Realhub Systems Pty Ltd	Australia	48 608 435 990
Review Property Pty Ltd	Australia	52 159 320 519
South Australia Real Estate Media Pty Limited	Australia	45 601 949 491
Tasmania Real Estate Media Pty Ltd	Australia	41 602 734 725
Western Australia Real Estate Media Pty Limited	Australia	17 602 692 508
Workstream Technologies Pty Ltd	Australia	72 123 399 155

\* Entity applied for voluntary deregistration during the Reporting Period. As a result, strike off action was in progress as at 30 June 2024. The entity was deregistered between the end of the Reporting Period and the date of this Statement, effective 31 July 2024.