

ALTX GROUP

Modern Slavery Statement

2024

1. Background

AltX Group (AltX) recognises its responsibility to identify, mitigate and eliminate any risks of modern slavery within its operations, supply chains, and business relationships. We recognise that addressing modern slavery is not only a legal obligation but also an ethical imperative. We are committed to fostering transparent and sustainable business practices and ensuring that our suppliers, contractors and stakeholders share in this responsibility.

This Modern Slavery Statement has been prepared in response to the federal Modern Slavery Act 2018 (Cth) that requires mandatory reporting and disclosure on the following specific criteria.

2. The reporting entity to which this Modern Slavery statement applies

This Modern Slavery statement applies to AltX Ventures Holdings Pty Limited (ABN 15 710 131 449) ("the AltX Group") and its subsidiary companies.

3. AltX Group's structure, operations and supply chains

3.1 Structure

AltX Group is a private company incorporated in Australia. The business was founded in 2012 as Assetline Capital providing non-bank lending solutions for small to medium sized businesses. Since its founding in 2012, the business has developed and now operates through a holding company structure of the AltX Group, with three main operating units.

The AltX Group originates and manages private capital transactions via an integrated model.



The operating business units consist of Assetline Capital, AltX and a wholesale funding business providing other lenders (Sub-Originators) with wholesale funding to fund the loans that they originate.

Assetline Capital is an established non-bank lender, which provides borrowers with a range of bespoke financing solutions, secured by mortgages against property.

AltX is a private credit fund manager providing institutions, family offices and private wholesale investors with investment opportunities in the loans that are originated by Assetline Capital and its wholesale funding business partners. These investment opportunities provide investors with attractive risk-adjusted returns uncorrelated to public markets.

AltX Group has its head office in Sydney and has offices in Melbourne, Brisbane and Perth. The company employs approximately 60 people.

AltX Group has no operations outside of Australia. It does have a small, outsourced workforce that is engaged and managed by a reputable Australian provider.

3.2 Products

Lending Products

AltX Group funding products provides specialist lending solutions for SMEs, self-employed borrowers and consumers:

- **Bridging Loans (SME)** - Short term capital lending for business owners and property professionals.
- **Construction loans (SME)** - Construction and development capital for new to partially completed builds.
- **Horizon long term loans** - Long term capital lending for self-employed, business owners, SMSF borrowers and consumers.
- **Clinch short term bridging loans** - Short term flexible property lending for consumers with loan terms up to 12 months.
- **Generate Loans** - First home buyers deposit product for consumers.

Investment Products

AltX investment products provide institutions, family offices and private wholesale investors with investment opportunities into real estate debt products with attractive risk-adjusted returns uncorrelated to public markets:

- **Individual deals** - Invest in single deals from a range of curated real estate debt opportunities via the AltX platform.
- **AltX Credit Funds** - Invest in one of AltX's rated funds which invest in real estate debt opportunities originated through the Group.

3.3 Operations

AltX Group only operates in Australia. Its operations include the provision of financial lending and investment opportunities to clients. All operations are conducted in accordance with the relevant legal and regulatory requirements.

The Group, through its subsidiaries holds an Australian Financial Services Licence and an Australian Credit License.

All employees are employed under individual employment contracts and employment arrangements practices are all consistent with Federal and state legislation.

3.4 Supply Chains

AltX Group's supply chain mainly involves the flow of capital, services, and technology to support lending and investment operations. Key components include funding sources such as wholesale funders, institutional investors, private investors, as well as partnerships with brokers, technology providers, and service vendors to facilitate loan origination, loan servicing and funds management.

AltX Group engages third-party providers for legal and regulatory services, IT support, office supplies and facilities management. AltX Group also engages small, outsourced workforce through a third-party provider.

4. The Risks of modern slavery practices in the operations and supply chains of AltX Group and the entities it owns or controls

AltX Group operates in an interconnected business environment that has the potential to expose the business to modern slavery practices. These risks may arise in both direct operations and via its supply chains.

The following areas have been identified as potentially vulnerable to modern slavery risks:

1. Supply Chain Exposure:

- Engaging with suppliers, contractors, and service providers in industries that may be prone to labour exploitation, such as construction, facilities management, technology services, and financial consulting.

2. Indirect Risks through Investment and Lending Activities:

- Financial services activities, including construction finance and lending, carry inherent risks where clients, borrowers, or developers might engage with contractors or subcontractors in high-risk sectors.

3. Outsourcing:

- Outsourcing arrangements may involve businesses operating in regions or industries with a higher prevalence of forced labour or human trafficking.

AltX has assessed the causal, contributory and direct risks of modern slavery practices within its operations to be extremely low.

5. Actions taken by AltX to assess and address modern slavery risks

AltX Group is committed to identifying, mitigating, and addressing modern slavery risks across its operations and supply chains. The Group's ESG Policy considers the protection of human rights across its value chain a fundamental element of social responsibility and a core component of its sustainability vision.

AltX Group's outsource partner, TryPod Australia Pty Ltd, is committed as per their Modern Slavery Policy to upholding the highest standards of ethical conduct and human rights in their operations and supply chains.

AltX Group will respond swiftly to any indicators of modern slavery practices within our operations or supply chains, taking the necessary steps to address the matter and to ensure it is appropriately resolved.

6. How AltX Group assesses the effectiveness of these actions

AltX Group is committed to regularly evaluating the effectiveness of its efforts to mitigate modern slavery risks across operations and supply chains. Feedback from internal and external stakeholders, including employees, clients, and industry partners, plays a crucial role in refining our strategies.

The Group holds a quarterly ESG Committee meeting whereby practices including those of third parties are reviewed to ensure practices are sound.

7. The process of consultation by AltX Group

The AltX Group executives and representatives of each of the business units were involved in the preparation and drafting of this Statement.

8. Other relevant information

At the date of this Statement, there is no other relevant information to provide.

This Statement was approved by the Board of AltX Ventures Holdings Pty Limited on 17 December 2024 and is signed by Nicholas Raphaely in his role as the Key Principal.



Nicholas Raphaely
Director
AltX Ventures Holdings Pty Limited
17 December 2024