



**Mutual
Marketplace**

Modern Slavery Statement

Reporting Period July 2022 - June 2023

Executive Summary

Reporting Period July 2022 -June 2023

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Chairman and General Manager's Statements

Mutual Marketplace is committed to the long-term effort needed to diminish modern slavery from its supply chains and operations. To that end, Mutual Marketplace continues to engage and work closely with subject matter experts on modern slavery. We consider our modern slavery responsibilities to be an important component of our broader corporate social responsibility and human rights obligations.

Mutual Marketplace recognises that the efforts and measures in this Statement build upon earlier phases implemented since the introduction of the Act, in Mutual Marketplace's targeted efforts to identify and manage modern slavery risk.

This Statement is the fourth Statement pursuant to section 16 of the *Modern Slavery Act 2018* (Cth) for Mutual Marketplace for the period from 1 July 2022 to 30 June 2023 and covers the group of entities consisting of:

- Mutual Marketplace Pty Ltd (ABN 35 615 297 820)
- Mutual Marketplace Property Pty Ltd (ABN 45 100 215 932) and
- Mutual Marketplace Legal Pty Ltd (ABN 39 658 736 540).

In addition to meeting the specific legal reporting requirements under the Act, this Statement sets out Mutual Marketplace's methodology, key findings and planned framework for future action during upcoming reporting periods in relation to modern slavery risk identification and management.

This Modern Slavery Statement was approved by the Mutual Marketplace Pty Ltd Board of Directors on 2 November 2023 as principal governing body for the Mutual Marketplace Group, and is signed by Vince Pace as Chairman of the Board of Directors of Mutual Marketplace Pty Ltd.



General Manager
Gerard McCormack



Chairman
Vince Pace

Mandatory Criteria 1: Identifying the reporting entity

This joint Modern Slavery Statement (Statement) is made pursuant to the *Modern Slavery Act 2018* (Cth) (the Act) and covers the activities of the reporting entity Mutual Marketplace Pty Ltd ABN 35 615 297 820 (Mutual Marketplace) and its controlled entities (Mutual Marketplace Group) as of 30 June 2023.



Mandatory Criteria 2: Describe the reporting entity's structure, operations, and supply chains

Structure

Mutual Marketplace is an Australian Proprietary Company, 50% owned by Credit Union Australia Ltd (trading as Great Southern Bank) and 50% by Heritage and People's Choice Limited (formerly Australian Central Credit Union Ltd).

Mutual Marketplace has 2 subsidiaries:

- Mutual Marketplace Property Pty Ltd
- Mutual Marketplace Legal Pty Ltd.

Both subsidiaries are 100% controlled by Mutual Marketplace Pty Ltd and are based in Australia. Mutual Marketplace Property Pty Ltd manages Australian property leases and Mutual Marketplace Legal is an Incorporated Legal Practice.

The reporting entity's registered office is:

Level 6, Suite 6A, 300 George St
Brisbane QLD 4000

Operations

Mutual Marketplace Group is a provider of shared services, primarily within the Australian credit union industry, which include procurement, property leasing, risk, corporate credit card and expense management, and legal services.



FINANCE

Managing monthly expenses including the application of corporate credit cards, provision of software and following up outstanding transactions.



RISK

End to end risk management support from supplier onboarding and prequalification to ongoing performance and risk management.



PROCUREMENT

Providing end to end procurement services including source to contract, procure to pay, supplier relationship management and contract management.



LEGAL

Provision of legal services to Mutual Marketplace including contract review, negotiation and execution. Mutual Marketplace Legal also provides direct services as an Incorporated Legal Practice.



PROPERTY

Providing end to end property leasing services including market assessment and site selection, contract negotiations, agent and landlord relationship management, lease management and rent and outgoings invoice payments

Supply Chains

Over 90% suppliers directly engaged by Mutual Marketplace are based in Australia. Mutual Marketplace also engages with suppliers located in the United States, Thailand, Ireland, India, United Kingdom and New Zealand.

Mutual Marketplace predominantly procures goods and services for its customers across the following categories:



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

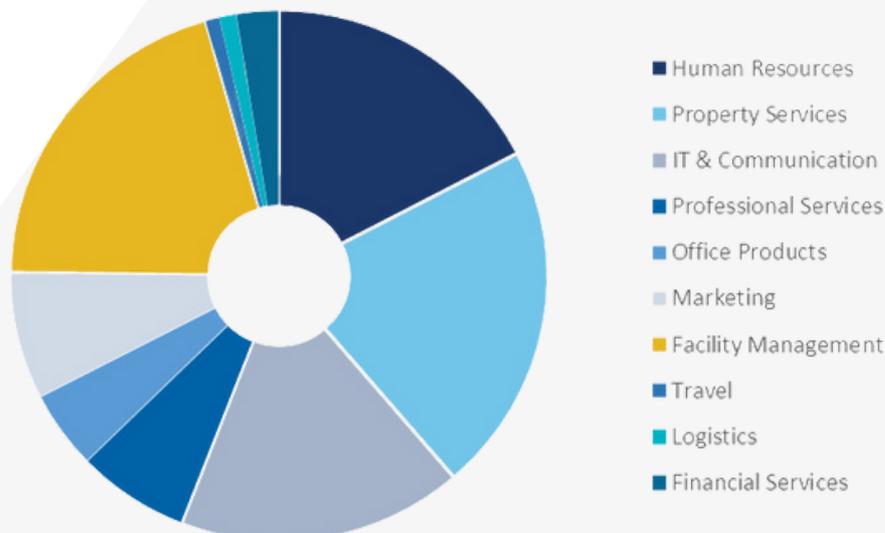
Risk Assessment

The primary purpose of Mutual Marketplace's initial risk assessment was to identify areas of greatest modern slavery risk in its supply chain. This provided a baseline which guided the focus of Mutual Marketplace's subsequent and ongoing modern slavery due diligence and remediation activities.

Incorporating company data throughout global markets, Mutual Marketplace utilises technology on SAP Ariba to trace the inputs required to produce products and services sourced within our supply chain.

The information below has been obtained for purposes of risk identification under the Act. This information does not confirm the actual existence or non-existence of slavery in Mutual Marketplace's supply chains or operations and assists Mutual Marketplace in determining where instances of slavery may exist. The analysis was undertaken at the industry and country level and does not account for variances at the entity, region, or product levels.

Figure 1: Classification of Mutual Marketplace's Supply Chain Categories



Source: TechOne analysis

Our analysis indicates the highest risk of modern slavery in Mutual Marketplace’s supply chain is through the sourcing of:

- (a) Information technology and communication services provided from India;
- (b) Electronic devices (e.g. laptops), equipment and peripherals from China; and
- (c) Cleaning services provided in Australia.

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

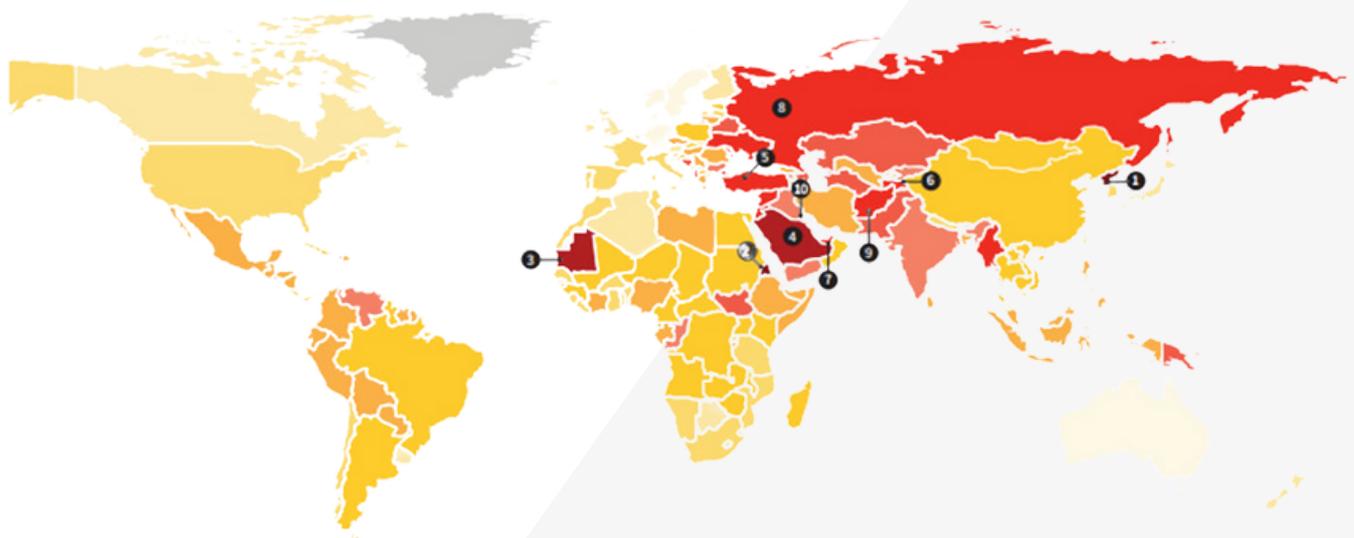


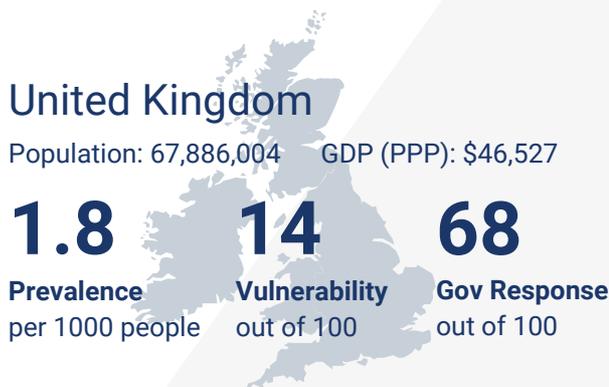
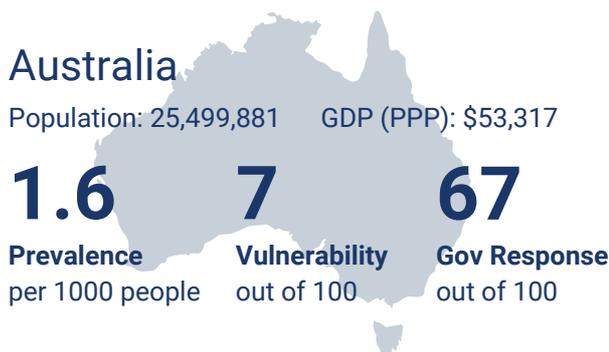
Figure 5
Estimated prevalence of modern slavery by country
 (noting estimated prevalence per 1,000 population for the 10 countries with highest prevalence)



Rank	Country	Prevalence
1	North Korea	104.6
2	Eritrea	90.3
3	Mauritania	32.0
4	Saudi Arabia	21.3
5	Türkiye	15.6
6	Tajikistan	14.0
7	United Arab Emirates	13.4
8	Russia	13.0
9	Afghanistan	13.0
10	Kuwait	13.0

Source: The Minderoo Foundation Pty Ltd, 2023 - <https://downloads.walkfree.org/gsi2023/data-maps.pdf>

The information below indicates the ratings on the global slavery index based on the countries of suppliers servicing Mutual Marketplace, and our customers, that have annual spend in excess of AUD\$1 million. These countries equate to 95% of Mutual Marketplace’s total supplier spend. This indicates the level of risk in each country by showing the estimated proportion of population living in modern slavery per thousand people along with the estimated vulnerability to modern slavery. As a result, Mutual Marketplace is able to identify the countries that are deemed a higher risk (ie., India) enabling us to undertake an appropriate level of due diligence to assess slavery risks.



Source: The Minderoo Foundation Pty Ltd, 2023 - <https://www.walkfree.org/>

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

(a) Debt bondage

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

(b) Deceptive recruiting for labour or services

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

(c) Forced labour

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

Whilst the risks to Mutual Marketplace for these types of modern slavery is low within Australia, that risk is increased by the volume of spend going to India and the heightened risk within India.



Mandatory Criteria 4: Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

Policy and Supplier Contracts Review

Mutual Marketplace has undertaken a comprehensive update of its internal governance policies to specifically address its modern slavery risks.

The key policy elements incorporated into the suite of policy documents includes:

- (a) Contractual terms addressing modern slavery and the ethical conduct of suppliers included in all new supplier contracts;
- (b) Modern slavery included in the Corporate Social Responsibility Policy; and
- (c) Inclusion of labour and human rights expectations of suppliers into the Supplier Code of Conduct.

During FY2023 Mutual Marketplace also moved existing suppliers over to its new templated contracts when contracts were either renewed or new contracts with suppliers were negotiated.

Internal Education and Training:

Mutual Marketplace's staff members receive education and training on modern slavery risks within supply chains and operations, which forms an important component of our risk and remediation strategies. That training occurs during onboarding, and is refreshed with further training of all staff annually. The internal education and training is primarily in the form of virtual and face-to-face training with staff members.

Through increasing the level of formal knowledge and training regarding the risks of modern slavery, Mutual Marketplace believes it has become more effective in its ongoing commitment to the elimination of such practices in its supply chains and operations. Our education program has involved the following modules: introduction; identifying modern slavery risks in operations and supply chains; due diligence, addressing modern slavery through supplier engagement; remediation; and measuring effectiveness.

All staff members are expected to be aware of modern slavery risks in our operations, and further educational material about modern slavery is made available to all employees through Mutual Marketplace's internal platforms.

Employment Arrangements

All employees of Mutual Marketplace are employed directly within the Mutual Marketplace Group, and most employees are on permanent contracts. This significantly reduces the risk of modern slavery arising through employment.

Ongoing Supplier Due Diligence and Monitoring

Following the assessments undertaken across Mutual Marketplace's supply chain following the introduction of the Act, Mutual Marketplace has implemented a ongoing program of work to continuously assess and monitor Modern Slavery Risks.

Mutual Marketplace leverages the SAP Ariba platform to identify supply chain risks, including Modern Slavery, using the Supplier Lifecycle and Performance (SLP) and Risk modules. These modules were created to improve transparency across supply chains and comply with the Act. Through these modules we are able to proactively monitor supplier risk, conduct assessments of suppliers against modern slavery standards, and provide input to enable Mutual Marketplace to mitigate risk.

As part of its broader due diligence program, Mutual Marketplace engages with new suppliers on or prior to onboarding by requesting certain information through the issuing of questionnaires, including a mandatory modern slavery questionnaire. Once onboarded, both new and existing suppliers are required to respond to the modern slavery questionnaire on an annual basis with responses to the modern slavery questionnaires being assessed.

As a result of applying these processes, Mutual Marketplace has received increased responses to its modern slavery questionnaires as follows.

Year	Completed Modern Slavery Questionnaires
FY 2023	227
FY 2022	30
FY 2021	6
FY 2020	Nil

These increased responses provide Mutual Marketplace with stronger due diligence and assessment of its supply chain modern slavery risk.

Mutual Marketplace also monitors media alerts daily on its suppliers, as these can identify potential modern slavery compliance issues. This monitoring is undertaken through SAP Ariba, which gathers data from multiple service providers, public and private, including articles, news reports, company information and other third-party content. SAP Ariba assigns suppliers a risk level, which is updated based on media alerts, company information, country risk and natural disasters which may impact that supplier or supply chain.

Ongoing Governance Controls

As part of its continuous improvement activities, Mutual Marketplace continues to review and update its internal governance policies to address and mitigate operational risks, including modern slavery risk.

Mutual Marketplace has a group wide incident management process for the reporting of incidents, including those relating to modern slavery. That process includes incident identification, assessment, investigation and remediation, and includes periodic reporting to the Mutual Marketplace Board of Directors.

Addressing Risk

Mutual Marketplace is continuously assessing the nature and extent of modern slavery risks with the aim of prioritising risk mitigation and situation specific responses. The categorisation methodology is based upon whether a particular identified modern slavery risk has been caused by (most direct link), contributed to, or linked with (least direct link) Mutual Marketplace’s direct business activities. Due to the nature and geographic location of Mutual Marketplace’s core business activities, it is likely that the majority of risks will lie within the less direct categories. That likelihood does not affect our commitment to measure the effectiveness of our modern slavery risk assessment and remediation activities, as outlined below.

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

Next Steps for Modern Slavery Risk Assessment and Remediation

Although our modern slavery risk profile has been assessed as low, we accept that modern slavery is a significant issue requiring continued diligence, attention and focus. We remain alert to potential incidents of modern slavery risks, and diligent about potential modern slavery issues deep within supply chains of services and products purchased or engaged by Mutual Marketplace.

We will continue to:

- Expand our due diligence activities across our supply chain and better understand the modern slavery risks within the extended tiers of the supply chain,
- Evolve our operational and governance practices, and

Work proactively with our suppliers in mitigating modern slavery risks.



Mandatory Criteria 5: Describe how the reporting entity assesses the effectiveness of these actions

Mutual Marketplace has a modern slavery working group consisting of the General Manager, General Counsel, Head of Procurement, Senior Legal Counsel and the Risk and Compliance Analyst. This working group assesses the effectiveness of our controls by:

- reviewing the due diligence and monitoring activities outlined above; and
- assessing the effectiveness of those activities.

The working group liaises with other key management personnel in undertaking the above reviews and assessments.



Mandatory Criteria 6: Describe the process of consultation with any entities the reporting entity owns

Mutual Marketplace has adopted a Group wide approach to managing modern slavery risk within its business and supply chains. The overall governance structures and shared services between the entities in the Mutual Marketplace Group encourages ongoing consultation between each Mutual Marketplace entity. For example, the subsidiary entities either have common board members with the Mutual Marketplace Pty Ltd Board of Directors or have board members who are from the Mutual Marketplace Pty Ltd executive team and modern slavery working group. Further, each entity reports to and is accountable to the Mutual Marketplace Board of Directors.

Mandatory Criteria 7: Provide any other relevant information

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Modern Slavery Statement

Reporting Period July 2022 - June 2023

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