



Joint Modern Slavery Statement

Ray White and Loan Market Group (2021/2022)

This is the third modern slavery statement (**Statement**) for the group of entities controlled by Group Administration Australia Pty Limited (**GAA**) ABN 30 010 374 731. The Statement describes the actions GAA has taken for the 2021/2022 financial year to prevent and address modern slavery issues in its operations and supply chains in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**).

Slavery is a crime and violates fundamental human rights. GAA is committed to ethical business practices and legal compliance and expects its staff, franchisees, members and suppliers to embrace that commitment. A snapshot of our work in this reporting period to combat modern slavery issues shows that we have:

- Consolidated and expanded our supply chain mapping exercise – no materially direct exposure to modern slavery issues identified, however, GAA recognises that this is a complex and ongoing exercise;
- Reviewed our human rights policy for staff, franchisees, members and suppliers – confirmation that GAA does not tolerate any form of modern slavery; and
- Commenced training senior staff to help them identify and manage any modern slavery issues in GAA's procurement space.

1 . Structure

The entities in the GAA group operate in a diverse range of industries and sectors, including:

- real estate agents (largely operating as independently owned franchisees) in the residential, commercial and rural property markets as well as hospitality, boats and property management – Ray White;
- property funds investment and advisory – White & Partners;
- mortgage broking and aggregation – Loan Market Group;
- financial advisory services – Wealth Market Group;
- home utility connection services – Home Now;
- services to assist with moving house, including arranging insurance, removalists and home improvement services – Concierge; and
- software development and licensing services – NurtureCloud.

GAA has determined that the following group entities satisfy the requirements for reporting contained in the Act (and this Statement is a joint statement under the Act on behalf these reporting entities):

- The Ray White (Real Estate) Partnership (**RayWhite**) ABN 21 464 496 649; and
- Loan Market Group Pty Ltd (**LoanMarket Group**) ABN 83 105 221 967.

During the 2021/22 financial year, certain changes in ownership and control occurred within the GAA group that will likely result in this being the final joint modern slavery statement that GAA will prepare. It is expected that, if any future statements are required, Ray White and Loan Market Group will prepare them separately.

Ray White

Ray White is a household name in Australasia, a name synonymous with the property and real estate industry. Established in 1902 in the small Queensland country town of Crows Nest, Ray White has evolved into Australasia's most successful residential real estate business, with over 1,000 individual franchised offices across Australia, New Zealand, Indonesia and various other countries. Ray White today is still a family-owned business, now spanning residential, commercial and rural property as well as hospitality, boats and property management.

Loan Market Group

Loan Market was founded in 1994 by GAA and is the largest and fastest-growing mortgage aggregator in Australasia. Proudly family-owned and led, the Loan Market Group supported a network of over 6,000 brokers across Australia and New Zealand across four brands – Loan Market, PLAN, Choice and FAST, all of which are committed to helping people achieve their financial and lifestyle goals.

2. Operations

The entities in the GAA group operate from business premises in most mainland States of Australia and across New Zealand. GAA entities employed approximately 720 people during the current reporting period and the workforce is comprised primarily of office-based professionals and other skilled labour.

GAA operates in various industries and sectors. Its most significant business operations involve entities in Ray White and Loan Market Group.

Ray White is a franchisor and its network of businesses are granted franchises entitling them to operate in the real estate industry, generally under the Ray White brand. Ray White provides professional, administrative, management, training, bookkeeping and technology services to its franchisees.

Loan Market Group grants its network of brokers rights entitling them to operate in the mortgage broking industry either under the Loan Market brand (operating as franchisees) or under the PLAN, Choice or FAST brands under which brokers operate their own named business. Loan Market Group provides professional, administrative, management, compliance, training and technology services to its brokers.

Having regard to industries in which the entities in the group operate and the nature of its workforce, GAA considers the risk of modern slavery issues in its operations to be very low.

Although the franchisees and brokers in the Ray White and Loan Market Group networks are independently owned and operated businesses, and so fall outside the scope of this Statement, because of the close connection **between** these entities, GAA is considering expanding its modern slavery action plan in future reporting periods to monitor more closely the operations of its franchisees and brokers.

3. Supply Chain

For the 2021/2022 financial year, GAA again mapped its supply chain and identified the largest suppliers by dollar value to Ray White and Loan Market Group. GAA also identified within this group of suppliers those that might be expected to pose the greatest modern slavery risk having regard to the industries in which those suppliers operate, their primary place of operation and the goods and services supplied.

The scope of GAA's modern slavery review focused on suppliers that accounted for approximately 75% and 80% of the total supplier spend by Ray White and Loan Market Group respectively. Reflecting GAA's commitment to its modern slavery action plan, this group expanded upon the number of suppliers reviewed in the previous year. These suppliers operate in the following industries, none of which are flagged as high risk from a modern slavery perspective:

- banking and financial services (including credit cards);
- legal, accounting and other professional services;
- real estate and leasing;
- internet, software and technology services;
- conferences and events; and
- media, advertising and recruitment services.

All but two of these suppliers were identified as being based predominantly in Australia, New Zealand or the United States. These two offshore businesses have previously been reviewed by Loan Market Group prior to being engaged as suppliers. As no slavery-related issues have been raised, GAA remains of the view that it is not necessary to conduct a more detailed modern slavery review of these suppliers. However, an on-site inspection is planned to occur during 2022/23 as part of the next stage of GAA's modern slavery action plan.

The goods and services provided by these suppliers do not fall within the list of products that the 2018 Global Slavery Index (2018 GSI) published by the Walk Free Foundation has identified as being most at risk of modern slavery, nor are the suppliers located in any of the ten countries listed as having the highest prevalence of modern slavery.

4. Modern Slavery Risks

GAA recognises that modern slavery is a significant problem and that it can be difficult to identify in global supply chains. However, it has not identified any modern slavery risks that require immediate attention or action, and nor has it identified any high-risk suppliers in its supply chain.

The GAA group operates in lower risk industries and, predominantly, in countries that are not categorised as high risk from a modern slavery perspective. GAA's risk assessment has been based upon the geographic, industry and sector profiles published in the 2018 GSI and having regard to information and resources published by other organisations.

GAA has also had regard to its existing Fair Work and Whistleblowing policies. These policies provide staff and franchisees in the Ray White and Loan Market Group networks with the opportunity to inform us if they have any concerns about contraventions of the Fair Work Act and other legislation guiding the operation of its businesses.

GAA is not aware of any modern slavery issues and did not identify any issues during its investigation of suppliers. GAA recognises that, whilst the processes and policies it has adopted and the steps it has taken to date are a good first step in addressing the risks of modern slavery in its operations and supply chain, more will need to be done in the future.

GAA has also not identified any issues that would suggest modern slavery risks exist within its network of franchised businesses or within any entity in the GAA group. Nor has GAA received any reports from staff or the network about modern slavery issues. These factors lead GAA to believe that the risk of modern slavery issues in its operations and first tier supply chain to be very low.

5. Action Plan

GAA proposes to again review its template clauses that deal with modern slavery issues and to try and incorporate them into contracts and policies with its suppliers and franchisees. These clauses include representations that the supplier or franchisee will not engage in any modern slavery practices, if they discover such practices they will notify GAA, and they will investigate and remediate such conduct, and GAA can require them to produce evidence of compliance with these representations.

GAA proposes reviewing its human rights policy and code of conduct (**Policy**) and will take further steps to remind staff and franchisees that they must comply with the Policy. It makes clear that GAA does not tolerate any form of modern slavery and expects its supply chain to have in place systems, processes and controls to prevent any form of modern slavery from happening in our business and their own. GAA intends to continue focusing on incorporating an obligation on suppliers to which it contracts to comply with the Policy.

During the 2021/2022 financial year, GAA reviewed its supply chain and expanded the suppliers reviewed (by reducing the dollar value threshold for supplies made to Ray White and Loan Market Group). GAA also identified within this group of suppliers those that might be expected to pose the greatest modern slavery risk having regard to the industries in which those suppliers operate, their place of operation and the goods and services risks.

GAA expects it will expand its audit process during 2022/23 by conducting on-site inspections or requesting supplier questionnaires be completed by those suppliers in higher risk categories. This data will help GAA identify if any modern slavery risks exist, and how they can best be addressed, and help determine whether further screening and analysis needs to be conducted before onboarding new suppliers into GAA's supply chain.

GAA's modern slavery training module is proposed to be provided to more GAA staff during 2022/23 to help explain modern slavery practices and raise awareness of this issue. This should help staff to identify risks during the procurement process.

6. Effectiveness

GAA is pleased to confirm that it received no reports of modern slavery practices from staff, suppliers or franchisees during 2021/22. Nor has GAA identified any modern slavery practices during this period.

GAA recognises that the process of assessing and addressing modern slavery risks is a complex and ongoing task. It will continue to review, develop and refine its policies and processes during 2023 and beyond. GAA has made progress in this area by providing online training to some senior staff to help them identify and manage modern slavery risks.

This includes proposing to conduct a more detailed risk review process for some of our suppliers, including on-site inspections and questionnaires for those suppliers either based in higher-risk countries or that supply products identified as being most at risk of having slavery issues.

GAA remains committed to identifying any non-compliance by its suppliers with their modern slavery obligations. Ensuring those suppliers understand that GAA will require them to determine the cause of any problem identified, establish an action plan to correct the problem and report on the outcome of those actions, remains a key part of its Human Rights Policy and contributes to its effectiveness in addressing these risks.

The effectiveness of GAA's modern slavery risk mitigation measures was hampered in part by COVID-19 pandemic restrictions. This included GAA being unable to progress any site inspections on its foreign-based suppliers. With the easing of restrictions in recent times, this action item is planned to be addressed during 2022/23 for some suppliers.

GAA was also not able to expand its modern slavery action plan to monitor the operations of its franchisees and brokers. GAA understands that this limits the effectiveness of its monitoring and control of modern slavery risks. As an initial measure, GAA proposes developing some form of training module that can be provided to the network during 2022/23.

7. Consultation

GAA is fully beneficially owned and controlled by members of the White family. Senior members of the White family are responsible for the key operations of the major entities in GAA group and are also directors of Ray White and Loan Market Group. They were consulted and informed of Australia's modern slavery reporting obligations.

This modern slavery statement was approved and endorsed by the boards of directors of GAA, Ray White and Loan Market Group on 22 December 2022, and is signed by Andrew Jamson in his capacity as director of the respective boards.

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Andrew Peter Jamson

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