

MODERN SLAVERY

STATEMENT – DECEMBER 2021

RESIMAC GROUP LTD



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## 1. Reporting Entity

Resimac Group Limited ("Resimac", "we" or "our") makes this statement in accordance with section 13 of the *Modern Slavery Act* 2018 (Cth) (the "Act") for the financial year ending 30 June 2021.

#### 2. About Us

#### Structure

Resimac is listed on the Australian Securities Exchange and is the ultimate holding company in the Resimac Group, which includes the following subsidiaries (collectively, "Resimac Group"):

- 1. Resimac Limited;
- 2. Resimac Asset Finance Pty Ltd;
- 3. Resimac Financial Services Pty Ltd;
- 4. FAI First Mortgage Pty Ltd;
- 5. Homeloans.com.au Pty Ltd;
- 6. The Servicing Company Pty Ltd;
- 7. Resimac Financial Securities Limited;
- 8. Evergreen Finance Company Pty Ltd; and
- 9. Resimac Home Loans Limited.

Resimac is the only reporting entity in the Resimac Group for the purpose of the Act.

## **Operations & Supply Chains**

Resimac Group has over 35 years of experience delivering home and asset finance solutions in Australia and New Zealand. Resimac Group has offices in Sydney, Australia, and Auckland, New Zealand, and operates support services (via a hosted entity) from Manila, the Philippines. Resimac Group offers products through wholesale (mortgage originator), third-party (broker), and direct to customer distribution channels.

### **Further Information**

Further information about Resimac can be found in Resimac's 2021 annual report, which is available on our website www.resimac.com.au.

#### 3. Our Commitment

We recognise that modern slavery is a crime and a violation of fundamental human rights. We are committed to acting ethically and with integrity in our business dealings and relationships and preventing modern slavery in our own business and to helping prevent modern slavery in our supply chains.

During the reporting period this statement covers, we engaged and consulted with all subsidiaries in the Resimac Group in the development of this statement. We discussed details of the Modern Slavery requirements with relevant stakeholders of the Resimac Group. This included reporting requirements and information regarding the actions we intend to take to address these requirements.



## 4. Modern Slavery Risks & Controls

#### **Inherent Risk**

Resimac's day-to-day operations are relatively removed from industries and products more commonly associated with modern slavery, such as raw material intensive industries, or physical products that have a predominant overseas manufacturing and sourcing component. Furthermore, Resimac is not an authorised deposit taking institution, which significantly reduces the inherent money laundering risk posed by modern slavery.

We have assessed the inherent risk of modern slavery in our operations and supply chain as low.

### **Operations**

Resimac conducts customer due diligence and enhanced due diligence in accordance with its Anti-Money Laundering and Counter-Terrorism Financing Program prior to entering a relationship with a customer or potential customer. As part of this process, Resimac screens for politically exposed persons and persons who are subject to targeted financial sanctions under Australian sanctions law. Resimac also monitors customer transactions for suspicious activity and reports matters to AUSTRAC where a person or transaction is suspected of being linked to a crime.

Resimac staff are employed in accordance with the applicable local labour laws. All Resimac staff are required to comply with Resimac's Code of Conduct, and this requirement extends to Resimac's support service resources in the Philippines.

We have assessed the residual risk of modern slavery in our operations as low.

#### **Supply Chain**

Resimac procures goods and services from reputable providers in accordance with its Procurement Policy, which aims to ensure that Resimac achieves the highest levels of professional standards when making sourcing decisions. Resimac also requires material outsource vendors to complete bi-annual modern slavery attestations against core obligations as part of Resimac's Compliance and Enterprise Risk Monitoring Program.

We have assessed the residual risk of modern slavery in our supply chain as low.

#### **Assessment**

We have based our modern slavery risk assessments on discussions we held with the Resimac Group which we conducted since our inaugural statement was published.

We are committed to building a mature modern slavery framework to prevent modern slavery in our own business and to help prevent modern slavery in our supply chains. We recognise the need to review and assess our actions to identify and address our modern slavery risks in our operations and across our supply chain. This will be an ongoing and evolving process that we are committed to continue to build upon.



We stated in our 2020 statement that as we develop the framework, we will continue to assess its design effectiveness to ensure that it remains fit for purpose and works in congruence with our Three Lines of Defence Model and Compliance and Enterprise Risk Monitoring Program to address modern slavery risks. In 2022 and beyond, we will set continuous improvement measures to reach, so we can look back and assess the effectiveness of our approach.

## 5. Continuous Improvement

### Actions taken to assess and address modern slavery

Since our last statement, we have included modern slavery risk reporting and assessment into our existing compliance framework, group dispute resolution and group complaints framework. This establishes our business's processes in respect of modern slavery and human trafficking concerns, from reporting to the publicly available Resimac Group Whistleblower Policy, to our dispute resolution and complaints remediation policies.

Further, we are working with business procurement to insert relevant modern slavery wording into agreements for all wholesale (mortgage originator), third-party (broker), and direct to customer distribution channels prior to engaging third parties. This will ensure third party onboarding is subject to modern slavery due diligence prior to agreements being accepted. All our agreements require our business partners to meet all legal and regulatory obligations which includes modern slavery obligations.

In terms of our employment regime in the Philippines, prior to engaging operation support services (via a hosted entity) from Manila, Resimac ensures that all employment contracts are equal and fair for our outsourced operatives and their suppliers. As an employer we have regard to modern slavery risk awareness through training and biannual group communications discussing modern slavery and its negative impacts.

In 2022, we intend to continue to further embed dedicated modern slavery controls in our compliance and enterprise risk frameworks, policies and procedures. We also intend to continue to promote organisation-wide awareness of modern slavery in our own business and in our supply chains.

### 6. Contact

Stakeholders and communities may raise any concern regarding modern slavery in our operations or supply chain by email to compliance@resimac.com.au or via our Resimac Group Whistleblowing Policy.

#### 7. Consultation Process

This statement has been approved by the Board of Directors of Resimac.

#### Warren McLeland

Chairman of the Board Resimac Group Limited

Dated: 27 December 2021