



## **COG Financial Services Limited - Modern Slavery Statement**

### **Reporting Period: 1 July 2020 to 30 June 2021**

COG Financial Services Limited ACN 100 854 788 of Level 1, 72 Archer Street, Chatswood NSW 2067 (**COG**) and its related bodies corporate (**the COG Group**) has developed this Modern Slavery Statement (**Statement**) in line with the *Modern Slavery Act 2018* (Cth) (**the MSA Act**) in respect of the COG Group. This Statement outlines the actions taken by the COG Group to identify and address modern slavery risks in the COG Group's operations and supply chains during the reporting period 1 July 2020 to 30 June 2021 (**FY2021**).

#### **Commitment and values**

The COG Group is committed to responsibly assessing and addressing modern slavery risks in its operations and supply chains by taking all appropriate steps to ensure that the COG Group has no part – whether direct or indirect – in the provision of modern slavery and human trafficking throughout its operations and supply chains.

#### **About the COG Group**

The COG Group is a financial services organisation providing a range of financial products and services through the COG Group's broker and aggregation businesses and its finance leasing business. The COG Group's businesses operate exclusively in Australia, with some support services provided in various locations in South East Asia.

#### **Assessment and mitigation of modern slavery risks**

As a financial services organisation with a professional workforce, the COG Group considers the risk of modern slavery within its direct business operations to be low. However, the COG Group recognises that through its support services, some of which are sourced in South East Asia, it could be indirectly exposed to the risk of modern slavery and human trafficking.

Over the FY2021 reporting period the COG Group has maintained and progressed its group-wide approach to modern slavery by maintaining and improving its previously implemented risk management processes to identify, assess, mitigate and monitor potential risk areas where it could be exposed to human rights concerns, including modern slavery and human trafficking.

The COG Group has engaged AS White Global Pty Ltd which is an Australian company of long-standing and strong reputation, to source support services and resources in South East Asia. The COG Group also receives from AS White Global Pty Ltd an annual confirmation of that company's commitment to complying with the MSA Act.

The COG Group's approach to assessing and mitigating modern slavery risks includes reviewing and where necessary updating due diligence procedures and the requirement for suppliers to provide copies of their statements and policies relating to the MSA Act.

Modern slavery risks are more likely to exist where the principles of human rights are not respected and accordingly the COG Group's strategy to assess and mitigate modern slavery risks focuses on systems and processes to identify, prevent and remedy any actual or potential adverse human rights impacts under the areas of compliance, work culture, people, technology, governance, remediation and stakeholder engagement.

As a financial institution, the COG Group acknowledges that modern slavery and human trafficking is a potential risk in relation to financing activities. To address this risk the COG Group has credit risk policies and processes which incorporate a risk-based approach to assess any human rights risk (which incorporates modern slavery and human trafficking) as a part of its credit risk assessment and due diligence.



Additionally, the COG Group is committed to maintaining an open working environment in which employees, directors, contractors and suppliers are able to raise concerns regarding any actual or suspected unethical, unlawful or undesirable conduct freely and without fear of reprisal and intimidation. To support this commitment, the COG Group maintains a Whistleblower Protection Policy which is available on COG's website.

The COG Group is monitoring the effectiveness of the processes and procedures that it has put in place to address the modern slavery risks that the COG Group may cause, contribute to, or be directly linked to, in line with the UN Guiding Principles. The COG Group will continually assess the effectiveness of its actions in identifying and managing modern slavery risks by tracking its actions and outcomes, partnering with suppliers and other external partners and undertaking regular internal governance and external assurance processes. Based on the results of these processes the COG Group will adapt and strengthen its actions to continually improve its response to modern slavery.

### **Assessment**

During FY2021, COG did not identify any instances of modern slavery or human trafficking associated directly or indirectly with its operations. In risk assessments undertaken to date in relation to the COG Group's support services, no cases of modern slavery or human trafficking have been identified.

COG has consulted with all companies within the COG Group in the development of this Statement and this Statement has been approved by the COG Board.

A handwritten signature in black ink that reads 'A. D. Bennett'.

Andrew Bennett  
Group Chief Executive Officer  
29 December 2021