



Vestone Capital Modern Slavery Statement

Financial Year 2025

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Introduction

We recognise that modern slavery persists, and we are committed to contributing to its eradication in all its forms. We firmly believe that working free from slavery is a fundamental human right and a core principle of our commitment to creating a safe and secure work environment.

Vestone Capital respects fundamental human rights as set out in the *Universal Declaration of Human rights* and codified in the *International Covenant on Civil and Political Rights*, the *International Covenant on Economic, Social and Cultural Rights* and core *International Labour Organisations*. Vestone recognises the duties of both states and businesses in protecting human rights and eliminating modern slavery from all business functions.

This statement outlines Vestone Capital's actions in relation to activities undertaken to identify and mitigate the risk of modern slavery and human trafficking occurring within its supply chains and business functions for the financial year ending 30 June 2025. Whilst Vestone holds no obligation to report under the *Modern Slavery Act (Cth)*, we voluntarily report to emphasise our support in mitigating these risks.

This is a Voluntary Statement made pursuant to S.6 of the *Modern Slavery Act 2018* (Cth)

Vestone Capital's Business and Supply Chain

Structure and Operations

Vestone Capital is a standalone and independent asset financier, created by joint venture of Macquarie Group and Mitsubishi HC Capital. The Vestone workforce consists of approximately 70 staff members, all domestically based. Our products include Rental and Operating Lease, Chattel Mortgage and Finance Lease. We have two avenues of acquiring customers:

(i) Direct

Vestone Capital's direct business acquisition occurs through direct relationships with Vestone and the end-customer. Both Vestone and the end-customer have full visibility of each party and directly interact.

(ii) Vendors and Introducers

Vestone Capital's Vendor and Introducers channel operates where there is a party operating as an intermediary between Vestone and the end-customer. This can happen through a Principal and Agency Agreement where Vestone remains undisclosed, or through introduction where the end-customer has visibility and knowledge of Vestone being the financier.

Supply Chain

Vestone employs third party suppliers to provide goods and services in the ordinary course of business operations. This chain consists primarily of low-risk professional services which work in support of the key business functions, predominantly operating domestically within Australia. Where international resources are utilised, enhanced supplier accreditation is required. The key components they supply us with include:

- **Real estate:** the offices we work from.
- **Technology:** such as IT hardware and software.
- **Business services:** products that we buy into our office, for example furniture, stationery and marketing items, etc.
- **Travel services:** organising travel and accommodation requirements
- **Professional services:** such as external training services and legal support services

Vestone also finances assets for our clients and therefore works with the suppliers of these assets. This supply chain also consists of low-risk providers operating domestically and internationally and undertake a thorough supplier accreditation onboarding process. The key suppliers under this channel include:

- **Wholesalers:** entities that supply assets or equipment directly from the manufacturer. They are typically the original source of the goods being financed.

- **Resellers / distributors:** intermediaries who purchase assets or equipment from wholesalers or manufacturers and then sell them to end customers or other businesses. They do not manufacture the goods themselves but facilitate their distribution.

Whilst the risk is minimal it is crucial that there is supplier governance to ensure that proper practices are being implemented within our supply chain. Any breaches to our policies by suppliers will be flagged and investigated by our senior management. Further information surrounding supply chain policy as well as onboarding of new suppliers will be covered in the respective section.

Risk Assessment

The risks of modern slavery practices mean the potential of an entity to cause, contribute to or be directly linked to modern slavery. Vestone Capital's business does not operate in sectors identified as one of forced labour exploitation in the Global Estimates of Modern Slavery. All business operations as of the time this report is produced, are located within Australia. Australia is fully compliant with the Trafficking Victims Protection Act's minimum standards. Therefore, Vestone operates as a low-risk business in regard to modern slavery.

Whilst our risk level is low, Vestone still upholds policies and prevention mechanisms to mitigate any future risks.

Governance and Policy

Vestone supports fundamental human rights as set out in the *Universal Declaration of Human Rights* and core *International Labour Organisation* conventions. In line with the *UN Guiding Principles on Business and Human Rights*, Vestone recognises the duty of States to protect human rights and the responsibility of businesses to respect human rights. Vestone aims to identify and mitigate the risk of modern slavery and human trafficking occurring within its supply chain or business operations. Vestone has policies and procedures that govern the way it operates. These are relevant to how Vestone manages potential human rights related issues with regard to its employees, supply chain and business operations and include:

- **Code of Conduct Policy** – sets out the conduct expected from our management team, employees, contractors, and suppliers. The policy is set out in alignment with international human right principles, including those concerning modern slavery and child labour. The policy dictates how all business decisions and procedures are to be conducted and has clear provisions which do not tolerate any form of modern slavery, human trafficking, or abusive treatment in any part of our business.

- **Bullying, Discrimination and Harassment Policy** – provides the minimum standards of respect to be employed within the workplace environment. Ensures no bullying, harassment or discrimination is tolerated by any members within Vestone. This policy also provides avenues for redress if needed and discrete reporting mechanisms to ensure it is a safe workplace.
- **Work Health and Safety Policy** – recognises, supports, and promotes the rights of workers in ensuring they are safe within the workplace. This promotes a healthy workplace culture and mitigates risks of workplace maltreatment.
- **Environmental and Social Risk Policy** – establishes processes for identifying, assessing, managing, mitigating, remediating, and reporting environmental and social risks. This policy mandates notification to senior management if there is any credible allegations or evidence of human rights breaches.
- **AML & CTF Policy** – focuses on Anti-money laundering and Counter-Terrorism Funding, ensuring that Vestone runs credible pre-employment screening on new employees, as well as customer identification. This policy ensures that Vestone is not engaging in employing or funding towards parties engaging in human rights breaches.
- **Supplier Governance Policy** – lies within a broader Business Governance policy. It outlines the necessary onboarding screening needed when hiring new suppliers, as well as the ongoing governance provided. This provides Vestone with an oversight of all suppliers and governance ensuring compliance with human right standards.
- **Supplier Accreditation and Controls Policy** – designed to ensure that all suppliers involved in credit transactions meet rigorous standards of integrity, reliability, and operational transparency. The policy establishes a structured accreditation process that includes credit checks, business verification, and risk assessments to identify and mitigate potential risks, including those related to unethical practices such as modern slavery. By enforcing these controls, Vestone aims to uphold responsible sourcing and maintain a supply chain free from exploitation.
- **Introducer and Supplier Monitoring Framework** – establishes a structured approach to identifying, investigating, and managing misconduct risks associated with introducers and suppliers. The policy supports ethical conduct by monitoring key risk indicators such as fraud,

complaints, early hardship, and recurring incidents, ensuring that all third-party partners uphold the company's standards of integrity and customer fairness. This framework plays a critical role in safeguarding against unethical practices, including those that may contribute to modern slavery, by promoting transparency, accountability, and continuous oversight across the supply chain.

Each policy holds respective escalation and remediation processes available. Non-compliance by an employee, contractor and/or supplier will be reported to Senior Management and may also be reported to the Vestone Capital Board ("the Board") if deemed a significant material breach. There may also be external reporting obligations.

Due Diligence Processes

Vestone has employed processes to effectively conduct due diligence surrounding prospective employees, suppliers, and lessees.

Employees – under our Anti-Money Laundering Policy there is mandatory background screening of any prospective employees prior to any official offer of employment or onboarding.

Suppliers – upon on-boarding new third-party suppliers for the ordinary course of Vestone business extensive due diligence is performed. The Business Governance Policy sets out at a minimum the necessary checks required. These include:

- i. ASIC company search to establish business registration, shareholders, and directors.
- ii. Ensure no material adverse information relating to business.
- iii. Supplier questionnaire including questions surrounding environmental and social responsibility. This is the main level of screening surrounding modern slavery and human trafficking.
- iv. Other checks considered necessary.

This extensive process is to ensure Vestone does not conduct or trade in business with suppliers who are not meeting the necessary human rights standards or cooperating in modern slavery acts.

When onboarding suppliers Vestone finance for customers the accreditation processes are set out in the Supplier Accreditation and Controls Policy:

- i. Conduct an ASIC company search to confirm business registration, shareholders, and directors.

- ii. Obtain and review a credit report to ensure there is no material adverse information. Additional checks are performed for high-risk suppliers or exposures above the defined threshold.
- iii. Supplier assessment including questions surrounding environmental and social responsibility. This is the main level of screening surrounding modern slavery and human trafficking.
- iv. Verify the supplier's online presence, physical business premises, and alignment of goods or services with the lessee's business
- v. Confirm bank details and a secondary verification method to prevent fraud
- vi. Compile a full accreditation pack and obtain appropriate approval based on the supplier's risk profile and exposure level.

As part of our credit assessment process, we conduct due diligence to address risks which are non-financial in nature, such as environmental, social and governance, reputational, and compliance risks such as financial crime. On top of the original processes mentioned above, there is ongoing due diligence reviews. These include re-conducting these processes mentioned as part of an annual review.

Each employee has an obligation to speak up about concerns surrounding modern slavery conduct, as set out in the Code of Conduct Policy.

Effectiveness of our Actions

In assessing the effectiveness of our actions, we undertake the following:

- **Internal Review of policies and procedures** – There is regular review of our policies and procedures, ensuring there is compliance with all regulatory requirements and best practices. This includes review of due diligence and on-boarding mechanisms and ongoing monitoring of suppliers.
- **External scrutiny** – Our modern slavery policies and procedures also receive external scrutiny and are assessed by our clients when they are verifying our position surrounding modern slavery.

Continuous improvement

Vestone will review and enhance its approach to addressing modern slavery risks within its supply chain and parts of its business operations by:

- Continuing to assess new material service providers/vendors through the onboarding process.
- Engaging with material service providers/vendors to ensure they understand and assist them to meet the requirements
- Continuing to assess human rights and modern slavery risks
- Continuing to train all staff on Vestone's Code of Conduct, and other relevant policies
- Continuously reviewing and enhancing supplier accreditation and performance monitoring policies to identify opportunities for improvement and ensure alignment with modern slavery risk management objectives.

Approval

This Modern Slavery Act Statement was approved by the Vestone Capital Board and will be updated annually.

The Board has considered and approved this Statement prior to Publication.



Ian Delaney
Chief Executive Officer