

# Modern Slavery Statement



This joint modern slavery statement (Statement) has been prepared and submitted by PEXA Group Limited ACN 629 193 764 and on behalf of Property Exchange Australia Limited ACN 140 677 792, each a reporting entity under the *Modern Slavery Act 2018 (Cth) (Act)*. In this Statement, these entities are collectively referred to as the 'PEXA Group'.

This Statement sets out the actions taken by PEXA Group to identify, assess, and address modern slavery risks across its operations and supply chains for the reporting period ended 30 June 2021.

## Our commitment to ethical and responsible business

PEXA Group's focus on ethical governance practices is fundamental to PEXA Group's ability to deliver lasting value for its people, communities and our planet. PEXA Group's responsibility to champion and support internationally proclaimed human rights is critical to how we operate and approach sustainability. This position extends to how PEXA Group approaches and mitigates the risks of modern slavery throughout its business and supply chain.

## Transforming property experiences for everyone

### **About PEXA Group**

These days, when Australians buy or sell a house, chances are their transactions will happen online. That's because back in 2010, PEXA Group began a journey that would ultimately revolutionise the way Australians exchange property. Backed by a government initiative aimed at creating less paperwork, process times and margin for error, PEXA Group set about modernising the AU\$9 trillion residential property market.

The PEXA Group of companies consists of PEXA Group Limited (a public company listed on the Australian Securities Exchange) and a number of wholly owned subsidiaries. This includes Property Exchange Australia Limited (PEXA), the entity that operates the platform known as 'PEXA'. As the main operating entity within the PEXA Group, PEXA is the entity that enters into the majority of supplier contracts and has responsibility for managing the supplier base.

### **A world-first initiative**

PEXA is one of the only platforms in the world that enables lodgement of documents with the land registry and payment of settlement funds at the same time. Robust, secure and fast, our superior property settlement experience is trusted by more than 9,700 legal and conveyancing firms and 150 financial institutions with more than AU\$2 trillion in property value transacted via the platform to date.

### **Built by the industry, for the industry**

Created in partnership with enterprising individuals from government, as well as the banking, legal and conveyancing communities, PEXA meets the needs of everyone, from lenders to homeowners. And because those needs are always changing, PEXA collaborates with members wherever possible. In the last year alone, 86% of our platform enhancements came from member feedback.

### **Here to help you home**

Today, with more than 10 million transactions (and counting) completed, PEXA provides 20,000 families a week with a fast, safe and efficient property settlement.

## PEXA Group's supplier base and risk profile of modern slavery practices

PEXA Group complies with the Act. In turn, PEXA Group requires all suppliers to adhere to and maintain operating standards in accordance with our [Responsible Sourcing Policy](#).

PEXA Group has a supplier base of approximately 500 suppliers, which provide direct and indirect services and products. This supplier base is predominately made up of Australian-based businesses and are concentrated within two substantial categories of spend:

1. professional and technology services (including advisory, consulting, development and managed services); and
2. technology covering infrastructure services, software applications, and hardware.

Other notable procurement categories for PEXA Group include recruitment services, facilities management, and marketing.

PEXA Group's business activities do not directly intersect with high risks sectors, however we have identified that the use of services managed by third party providers such as labour hire, outsourced activities and sub-contracting may represent a potential risk if third parties are not compliant with labour legislation and standards.

## Actions taken to assess and address modern slavery risks

During the reporting period, PEXA Group undertook the following actions to assess and address modern slavery risks:

- A Responsible Sourcing Policy was approved by the board of directors of PEXA Group Limited that addresses areas of modern slavery, discrimination, safe working conditions, environmental protection and approach to remediation.
- Internal Responsible Sourcing policy training undertaken by employees across the PEXA Group.
- Launched a program of work in partnership with Sedex, a leading ethical monitoring trade service provider. Sedex supported PEXA Group with supplier reviews, oversight of compliance activity, global notifications and insights.
- Undertook an assessment of the PEXA Group supplier base to determine where inherent risks could exist within PEXA Group's supply chain.
- Incorporated the Responsible Sourcing Policy in the onboarding of new suppliers.
- Inclusion of modern slavery questions within PEXA's third party risk assessment which forms part of the supplier onboarding process.

As a result of the above activities, PEXA Group identified three key suppliers that were considered "high risk" due to their offshore operations which directly support the services and products they provide to PEXA Group. These suppliers are described below:

1. A top tier consultancy that has an offshore managed service team providing skilled technology staff. PEXA has a long-standing, strategic relationship with this supplier.
2. A newly appointed technology consultancy firm to support PEXA's international growth strategy providing technology design and engineering resources from offshore locations.
3. A supplier that sources branded merchandise for PEXA, that is manufactured and fulfilled offshore.

PEXA Group reviewed these suppliers in more detail and verified that these suppliers are effectively managing their modern slavery risks.

## Path of Continual Improvement

PEXA Group is committed to continually improving its approach to identifying, addressing and mitigating modern slavery risks. PEXA Group continues to work in collaboration with its suppliers to achieve the objectives of the Act.

For the reporting period ending 30 June 2022, the actions that the PEXA Group will take to improve its approach will include the following activities:

- PEXA Group's Responsible Sourcing Policy to undergo an annual review;
- supply contract templates to be updated to include clauses to address modern slavery risks;
- ongoing supplier risk reviews will continue in partnership with Sedex, to address any changes in modern slavery risks in the supply chain;
- identification of a group of suppliers that are considered to be "medium risk" within the supply chain and will engage with these suppliers to ensure compliance;
- employee training will be conducted by Sedex to strengthen awareness on modern slavery risks; and
- incorporate modern slavery oversight within PEXA's Risk and Compliance Committee.

To assess the effectiveness of its actions, PEXA Group will continue to undertake the following activities:

1. assess the percentage of staff responsible for supplier engagement who have read and understood the terms of the Responsible Sourcing Policy; and
2. assess the number of suppliers that have completed the third-party risk assessment and agreed to comply with PEXA's Responsible Sourcing Policy.

PEXA Group supports the objectives of the Act and is committed to identifying and addressing risks and any impact of modern slavery in its operations and supply chains.

## Consultation and Approval of Statement

This Statement was prepared by PEXA Group Limited in consultation with management of Property Exchange Australia Limited, including representatives from the legal, risk and procurement departments. PEXA's Chief Transformation Officer is responsible for preparing this Statement and approved this Statement prior to submission to the board of Property Exchange Australia Limited.

As Property Exchange Australia Limited is the main operating entity within the PEXA Group and is responsible for managing the supplier base, it was considered appropriate that the board of Property Exchange Australia Limited approve this Statement prior to submission. The Statement has been prepared in accordance with a policy adopted by the principal board of the PEXA Group.

This Statement was approved by the board of directors of Property Exchange Australia Limited on 23 December 2021.

A handwritten signature in black ink, appearing to read "G. King".

Glenn King  
PEXA Group Managing Director and CEO