

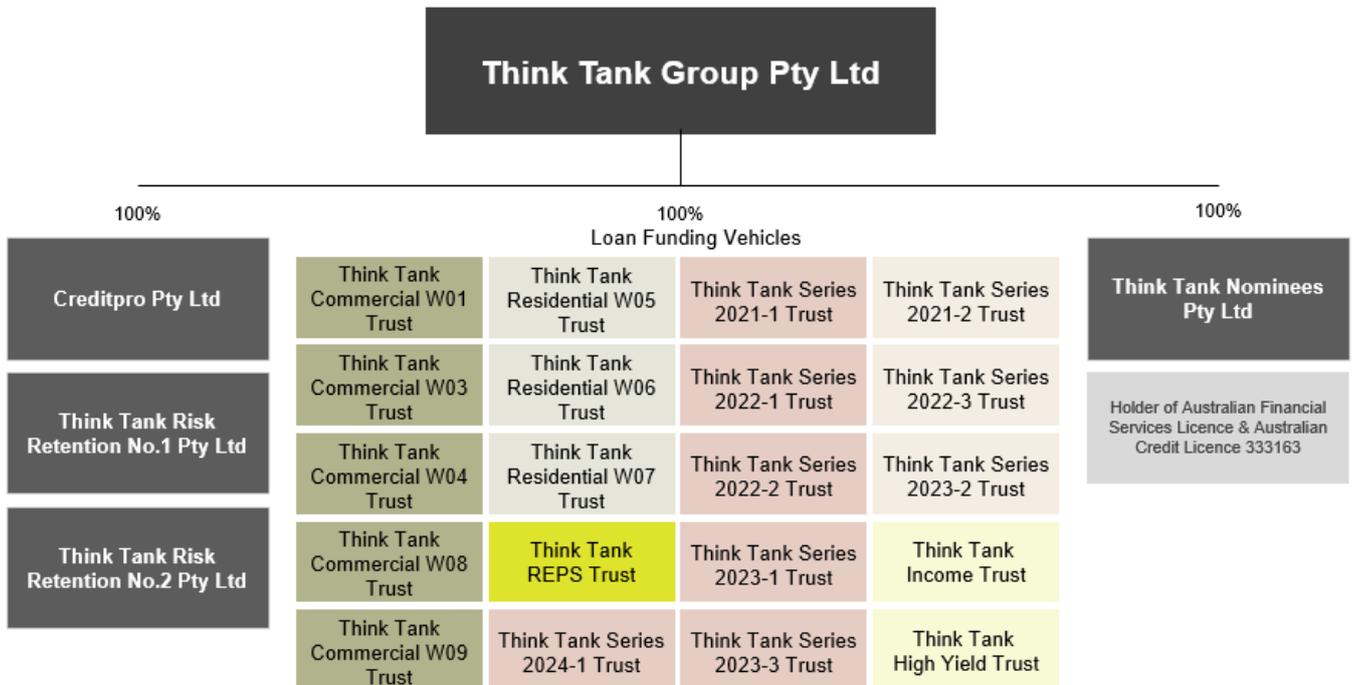
# Modern Slavery Statement

This modern slavery statement is made on behalf of Think Tank Group Pty Ltd (“TTG”) (ABN 75 117 819 084) and its controlled entities, under the Modern Slavery Act 2018 (the Act). This statement identifies the actions TTG has taken to recognise, assess and address modern slavery risks across its operations and supply chains for the period 1 January 2024 to 31 December 2024.

Modern slavery is defined as a range of practices that include trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, child labour, and deceptive recruiting for labour services. TTG acknowledges that modern slavery can occur within the Financial Service sector and may be exposed within its operations and supply chains. TTG is committed to fulfilling its ongoing responsibilities in eliminating modern slavery.

## Company Structure

Think Tank Group Pty Ltd is a privately owned company incorporated in Australia under the Corporations Act, commencing business in July 2006 as a non-bank provider of commercial and residential property finance. Think Tank Nominees Pty Ltd and Creditpro Pty Ltd are wholly owned subsidiaries of TTG.



In this Statement TTG, together with its majority owned subsidiaries and trusts, are referred to as 'the TTG Group'. A reference in this Statement to 'we', 'our', 'Thinktank,' or 'TTG' is a reference to the TTG Group.

## **Thinktank Group Operations**

Thinktank employs approximately 200 people with its main office located in Sydney, New South Wales, and satellite offices in Perth, Melbourne and Brisbane. The company is governed by a board structure reflecting industry leading practice in operational risk management and prudential oversight.

### **Think Tank Group (TTG)**

TTG has become established as one of Australia's leading property funding specialists to the self employed and SME sector, offering a cross section of loan products enabling borrowers to purchase, refinance and release equity from residential and commercial properties around Australia.

Thinktank commercial and residential loans are primarily originated via individually accredited and regulated finance brokers. TTG complies with the Fair Work Act and National Employment Standards and only employs staff who live and are permitted to work in Australia. Our Code of Conduct affirms our commitment to compliance with equal employment opportunity laws and other applicable civil rights and labour laws.

TTG is an appointed credit representative (No. 364258) under the Think Tank Nominees Pty Ltd Australian Credit Licence 333163.

### **Think Tank Nominees Pty Ltd (TTN)**

TTN holds an Australian Financial Services Licence (AFSL) and Australian Credit Licence (ACL) (No. 333163) and is 100% owned by TTG.

### **Noteholders**

Creditpro Pty Ltd, Think Tank Risk Retention No.1 Pty Ltd, and Think Tank Risk Retention No.2 Pty Ltd are noteholders in the Group's securitisation funding program and have no day-to-day business function. They are 100% owned by TTG.

### **Loan Funding Vehicles**

TTG has established various loan funding vehicles specifically to support the origination and securitisation of first mortgage commercial and residential property loans. All funding vehicles are created as bankruptcy-remote trusts under a master trust structure.

TTG has been the sole originator and underwriter of mortgages held in all trusts since inception and is responsible for the overall operational management of all the loan funding vehicles including portfolio management, financial management and detailed reporting to investors and stakeholders.

The W01, W03, W04, W05, W06, W07, W08 and W09 trusts are the principal wholesale funding entities supporting the Company's commercial and residential loan origination business activities. Loans are also selectively originated into REPS, Income Trust and the High Yield Trust.

## Supply Chain

All Thinktank operations are maintained onshore. Goods and services are procured from different suppliers, with the majority of direct suppliers being located within Australia. No direct suppliers were identified as being based in any of the 10 countries taking the least action to respond to modern slavery, according to the Global Slavery Index's 2018 findings.

Thinktank's supply chain covers the following key areas and, depending on size, value of goods or services produced, have varying contractual agreements.

- Information, communications, and technology
- Human resources and recruitment
- Property and facilities management
- Print, production, and logistics
- Marketing, events, travel and hospitality

## Addressing and Assessing Risks of Modern Slavery

Thinktank has undertaken a risk assessment of its operations and supply chain for FY24. Based on the assessment and given the singular nature of the services provided by TTG, the residual risk has been assessed as 'low' for the risk of modern slavery being present in the organisation and supply chain.

The evaluation is based upon the following:

- modern slavery risks have been assessed on the demographics of suppliers, economic size of supply spend and the nature of transactions;
- all TTG offices and employees are domiciled in Australia; and
- no goods and services have been procured from high-risk countries as defined by Global Slavery Index;

## Thinktank Policies

TTG has a range of policies that are relevant to addressing modern slavery across our business activities. These include:

- Risk Management Policy
- Code of Professional Conduct
- Supplier Policy
- Diversity Equity and Inclusion Program
- Whistleblower Protection Policy
- AML & CTF Program

We ensure that we are doing everything we can to identify, assess, mitigate and address modern slavery risks, including regularly reviewing policies to determine their effectiveness in addressing modern slavery requirements. Thinktank expects the same standard from all contractors, suppliers and business partners.

## Actions Taken to Address the Risks of Modern Slavery

Thinktank's commitment to addressing modern slavery within the organisation and its supply chain has continued into FY25 through the following:

- Development of an organisation wide training module to raise awareness of modern slavery and Australian legislation and reporting requirements.
- Completed a comprehensive due diligence process on new and existing suppliers, to formally assess their exposure to modern slavery risks.
- Monitoring of any complaints and grievances that may arise, including the investigation of disclosures via our whistle blower process, relating to modern slavery.

During FY24, no modern slavery issues were identified or reported and therefore no remedial action has been taken.

## Assessing Our Effectiveness

Thinktank's focus over the reporting period has been to promote organisation wide awareness of our approach to recognise, assess and address modern slavery risks across our operations and supply chains. Thinktank acknowledges that measuring effectiveness is critical to assist in informing appropriate actions to address risks. The activities used to assess the effectiveness of actions include:

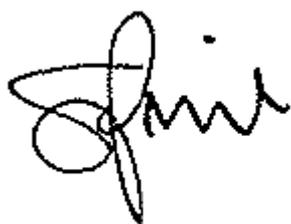
- Identifying new and emerging risks within the supply chain through ongoing monitoring and review.
- Monitoring regulatory changes to stay updated with modern slavery laws and regulations.
- Circulating questionnaires to suppliers to understand their modern slavery position.
- Reviewing questionnaire responses to gain insights into the supply chain, including the identification of weaknesses and concerns.
- Development of the Modern Slavery and Anti-Bribery and Corruption Supplier Procedure.
- Requiring one hundred percent employee participation in modern slavery training modules.

## Future Commitments

Over the next review period Thinktank will focus on:

- Ongoing due diligence to review and strengthen supply chain contracts;
- Uplift of supplier agreements to appropriately contain anti-modern slavery supplier provisions;
- Further develop modern slavery training and increase employee awareness;
- Publish the Modern Slavery Statement on the Thinktank website; and
- Monitor relevant government and industry guidance on the assessment of modern slavery risks.

This statement was approved by the Board of Directors of Think Tank Group Pty Ltd in their capacity of principle governing body of Think Tank Group Pty Ltd on 23rd October 2024.



Simon Price, Chair



Jonathan Street, CEO