

MODERN SLAVERY STATEMENT 2024



YellowBrickRoad
Home Loans

1. MODERN SLAVERY STATEMENT

- 1.1 This Modern Slavery Statement (this Statement) is made by Yellow Brick Road Holdings Ltd (YBR) under section 13(1) of the Modern Slavery Act 2018 (Cth) (the Modern Slavery Act).
- 1.2 YBR is a reporting entity under the Modern Slavery Act. This Statement sets out the measures we are taking to ensure that modern slavery practices are not taking place within our organisation or our supply chain.

2. STRUCTURE OF YBR GROUP

- 2.1 YBR is a company incorporated in Australia. All the YBR related entities are wholly owned entities except Resi Wholesale Funding Pty Ltd (RWF) which is a 50% joint venture with Magnetar Financial LLC. YBR Mortgage Support Services Inc is a wholly owned company incorporated in the Philippines on 28 February 2024.
- 2.2 The following companies form part of the corporate structure of YBR:

Company Name	Country of Incorporation	Ownership Interest
Yellow Brick Road Holdings Ltd	Australia	100%
Exchange IQ Advisory Group Pty Ltd	Australia	100%
ACN 128 650 037 Pty Ltd	Australia	100%
Yellow Brick Road Finance Pty Ltd	Australia	100%
Vow Financial Group Pty Ltd	Australia	100%
Yellow Brick Road Aggregation Pty Ltd	Australia	100%
RESI Mortgage Corporation Pty Ltd	Australia	100%
YBR Administration Services Pty Ltd	Australia	100%
Loan Avenue Holdings Pty Ltd	Australia	100%
YBR Services Pty Ltd	Australia	100%
Yellow Brick Road Group Pty Ltd	Australia	100%
ACN 125 664 593 Pty Ltd (In Liq)	Australia	100%
ACN 124 480 084 Pty Ltd (In Liq)	Australia	100%
Boreanaz Pty Ltd*	Australia	-
Carithas Pty Ltd*	Australia	-
Skasgard Pty Ltd*	Australia	-
ACN 124 553 206 Pty Ltd	Australia	100%
ACN 126 061 569 Pty Ltd	Australia	100%
Finance Analysis Services of Australia Pty Ltd*	Australia	-
Vow Financial Holding Pty Ltd	Australia	100%
Vow Financial Planning Pty Ltd*	Australia	-
National Brokers Group Pty Ltd	Australia	100%
The Money Factory Pty Ltd	Australia	100%
The Mortgage Professionals Pty Ltd	Australia	100%
Select Mortgage Finance Pty Ltd	Australia	100%
Australian Property Finance Pty Ltd*	Australia	-
Vow Wealth Management Pty Ltd	Australia	100%
Ironbark Mortgage Solutions Pty Ltd	Australia	100%
National Brokers Group Holdings Pty Ltd	Australia	100%
National Brokers Group Leasing Pty Ltd	Australia	100%
Loan Avenue Pty Ltd*	Australia	-
Resi Wholesale Funding Pty Ltd	Australia	50%
YBR Mortgage Support Services INC	Philippines	99.98%

*De-registered on 6 February 2023.

Except YBR Mortgage Support Services Inc, the rest of the companies are incorporated in Australia. In this Statement, YBR Holdings, together with its wholly owned subsidiaries and joint venture are referred to as 'YBR'. A reference in this Statement to 'we' or 'our' is a reference to the YBR Group.

3. YBR BUSINESS OPERATION

- 3.1 YBR's operations span across Australia and its employees are based throughout Australia and in the Philippines. YBR's head office is in Sydney, New South Wales (NSW) and another office in Newcastle, NSW. YBR does not have an office in Philippines and all the Philippines employees work remotely from home. YBR has 89 employees, with 64 employees in NSW, and the rest based in other Australian states and Philippines. It has 25 employees based in Philippines. YBR staff across the YBR Group work from its offices and remotely from home. The staff located in other states outside NSW work remotely from home. YBR does not have any clients in Philippines, only employees as the Philippines operation solely provides corporate support services to the YBR Group and there are no revenue generating activities in Philippines.
- 3.2 YBR is a mortgage aggregator acting in an intermediary capacity between lenders and brokers. YBR facilitates mortgage/finance brokers accessing loans and financial products (residential mortgages, commercial loans, asset finance products and personal loans) from a range of lenders for their customer. YBR also provides business and learning support; compliance support and platforms to its brokers to assist with the running of their businesses. YBR also makes available to its brokers a range of insurance products through referrer arrangements with insurers. Insurance offerings include life insurance and general insurance.
- 3.3 RWF is a securitisation funding business with its primary role being the funding of home loans to Resi Home Loans through the process of securitisation.

4. SUPPLY CHAIN

- 4.1 The categories of goods and services procured are:
- ♦ technology services;
 - ♦ insurance;
 - ♦ residential property valuation;
 - ♦ banking and finance;
 - ♦ office space;
 - ♦ other professional services (including research and analysis, accounting, legal and consulting);
 - ♦ human resources;
 - ♦ credit bureaus;
 - ♦ travel;

- cleaning;
- office consumables;
- hospitality; and
- catering services.

4.2 YBR has contracts with outsource service providers who provide us with finance, administration and technology services and these contractors are based within and outside of Australian jurisdiction. Before entering into any contract, we conduct due diligence on contractors and the contracts includes a provision regarding the local labour legislation and regulations; and compliance with relevant modern slavery laws. Due to the locations of some of these operations, there could be a higher risk of modern slavery practices occurring on the basis of their geography.

5. **POLICIES AND PROCEDURES TO ADDRESS MODERN SLAVERY RISKS**

5.1 YBR's most salient risks of modern slavery may exist in the later tiers of the supply chain supporting the provision of certain product categories, such as technology hardware and other office equipment, furniture, utilities, uniforms, merchandise, and consumables. In addition, there may be potential risks of modern slavery in procurement of services from third-party vendor industries such as cleaning, property maintenance, security, food services, transportation services, courier services, and accommodation. The risk of modern slavery in these industries may be intensified in countries outside of Australia jurisdiction which are susceptible to higher prevalence of modern slavery.

5.2 YBR has an established set of policies and procedures that governs the way it operates. Some of the policies outlined below are relevant to how YBR manages potential modern slavery related issues regarding its business operations and supply chain:

- (a) Risk Management Policy;
- (b) Code of Conduct;
- (c) Whistleblower Policy;
- (d) Conflict of Interest Policy;
- (e) Outsourcing Policy; and
- (f) Compliance Manual.

Our policies and procedures collectively assist in identifying areas of concern so that mitigating action can be taken to lessen modern slavery risks in our supply chain. Our Whistleblower Policy describes how the Whistleblower Channel operates and how stakeholders, including employees, can utilize it to raise a concern. The Whistleblower Policy enables stakeholders to raise concerns through a confidential and anonymous channel. The Whistleblower Policy illustrates how the Whistleblower Program will receive, assess, investigate, and resolve concerns, including modern slavery related concerns. In 2024, no concerns were received related to modern slavery.

- 5.3 YBR also has adequate monitoring systems in place to monitor potential risks of modern slavery. As a part of our control system to mitigate against modern slavery and associated risks in our supply chain we negotiate with our suppliers to include contractual provisions which require compliance with the Modern Slavery Act. YBR will take reasonable steps to ensure that its suppliers are aware that they are expected to adhere to the standards expected by YBR in accordance with YBR Supplier Code of Conduct.

6. RISK IDENTIFICATION, MANAGEMENT AND MITIGATION IN OPERATIONS AND SUPPLY CHAINS

- 6.1 YBR has undertaken a risk assessment of our operations and supply chain. Based on our assessment we consider the risk of modern slavery in our organisation and supply chain to be very low.

- 6.2 YBR mainly deals with individuals, trusts, corporations, and partnerships whose offices and employees are located in Australia which is a low-risk location. We also ensure that goods and services we procure are predominantly from countries that have been identified as low-risk locations. For the procurement of goods and services from overseas jurisdictions such as Philippines we take into consideration the values and reputation of the supplier rather than focusing on price alone as part of our due diligence exercise.

7. EFFECTIVENESS OF OUR ARRANGEMENTS

- 7.1 As part of our compliance framework, we assess the effectiveness of our system by conducting regular assessment of our suppliers' contractual arrangements with us. The YBR Legal and Compliance team also conducts reviews of the due diligence conducted by YBR staff to ensure that the necessary standards are being observed.

8. PROCESS OF CONSULTATION

- 8.1 The related corporate entities and corporate functions within YBR Group were consulted in the drafting of this statement, including: Legal, Compliance, Sales, Learning and Development, Human Resources, Information Technology, Marketing; and other internal stakeholders. All YBR Group entities are covered by the Group Policies, Procedures and Practices, to which this statement relates. Accordingly, these internal stakeholders provided input in relation to YBR and its wholly owned or controlled subsidiaries.

9. FUTURE COMMITMENTS

- 9.1 YBR will focus on reviewing and updating its policies with the aim of embedding the spirit of the Modern Slavery Act for new and existing supply arrangements. We will also be enhancing the training for relevant employees involved in the procurement of products and services in our supply chain.
- 9.2 All third-party arrangements, including those related to outsourcing, will be subject to due diligence which assesses the risk profile, the nature and business model of all third-parties' susceptibility to modern slavery risks. In order to enhance the rigour and frequency of initial and ongoing third-party risks we will augment the due-diligence assessment as well as controls. We will include contractual clauses specific to modern slavery in all contracts and provide a modern slavery checklist to guide managers who are conducting due-diligence assessments.
- 9.3 We will also request third-party suppliers in all jurisdictions to provide us with a copy of their Modern Slavery Statement or attestation as confirmation of their

compliance with applicable Modern Slavery laws and regulation. In line with our continuous improvement approach, we will continually make improvements to ensure that supplier due diligence requirements exist at the outset and during the life of a contract and include consideration of the risks associated with the activities being outsourced.

10. APPROVAL AND SIGNATURE

10.1 This Statement was approved by the Board of Directors of YBR.



Mark Bouris

Executive Chairman

Yellow Brick Road Holdings Ltd

APPENDIX 1

The table below outlines the mandatory Modern Slavery criteria (as set out in the Modern Slavery Act) and reference to the page within the YBR Modern Slavery Statement which addresses the requirements:

MODERN SLAVERY ACT REQUIREMENT	YBR MODERN SLAVERY STATEMENT
Identify the reporting entity (16(1)(a))	2. Structure of YBR Group
Describe the structure, operations and supply chains of the reporting entity. (16(1)(b))	3. YBR Business Operation 4. Supply Chain
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls. (16(1)(c))	5. Policies and Procedures to Address Modern Slavery Risks
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to address those risks, including due diligence and remediation processes. (16(1)(d))	6. Risk identification, Management and Mitigation in Operations and Supply Chains
Describe how the reporting entity assess the effectiveness of such actions. (16(1)(e))	7. Effectiveness of our Arrangements
Describe the process of consultation with any entities that the reporting entity owns or controls. (16(1)(f)).	8. Process of Consultation
Provide any other information that the reporting entity or the entity giving the statement considers relevant. (16(1)(g))	9. Future Commitments
Provide the details of approval by the principal governing body of the reporting entity (16(2)).	10. Approval and Signature