

# Modern Slavery Statement 2023

REA Group Ltd (ACN 068 349 066)

realestate.com.au Pty Limited (ACN 080 195 535)

Mortgage Choice Pty Ltd (ACN 009 161 979)

## REA Group is a multinational digital advertising business specialising in property.

REA Group's purpose is to 'change the way the world experiences property' by:

- providing compelling property advertising services for real estate agents and property developers;
- providing digital tools, information and data for people interested in property; and
- helping property buyers and owners to finance their property needs.

This statement is a joint modern slavery statement (**Statement**) for the year ended 30 June 2023 covering REA Group Ltd (**REA Ltd**) and its wholly owned subsidiaries realestate.com.au Pty Limited (**realestate.com.au**) and Mortgage Choice Pty Ltd (**Mortgage Choice**). While only REA Ltd and realestate.com.au are reporting entities under the *Modern Slavery Act 2018 (Cth)* (**Act**), we have elected to report on Mortgage Choice as part of this Statement. This Statement is prepared for the purposes of, and in accordance with, section 14 of the Act.

As at 30 June 2023, REA Ltd was the ultimate holding company of 28 subsidiaries, including realestate.com.au and Mortgage Choice (collectively, **REA Group, We, Our or Us**). This Statement sets out the steps that REA Ltd, realestate.com.au, Mortgage Choice (and where applicable, any entities owned or controlled by REA Ltd, realestate.com.au and Mortgage Choice) have taken to assess and address risks of modern slavery within REA Group's operations and supply chains. REA Ltd, realestate.com.au and Mortgage Choice have shared internal policies and procedures and shared procurement, finance, risk, people and culture and legal functions. Where this Statement describes steps taken by REA Group to assess and address modern slavery risks, those steps have been taken on behalf of all three reporting entities.

<sup>1</sup> A full list of REA Ltd's subsidiaries is set out at pages 112-113 of [REA Group's 2023 Annual Report](#) and annexed to this Statement. A simplified corporate structure chart is also annexed.

## Our commitment to human rights

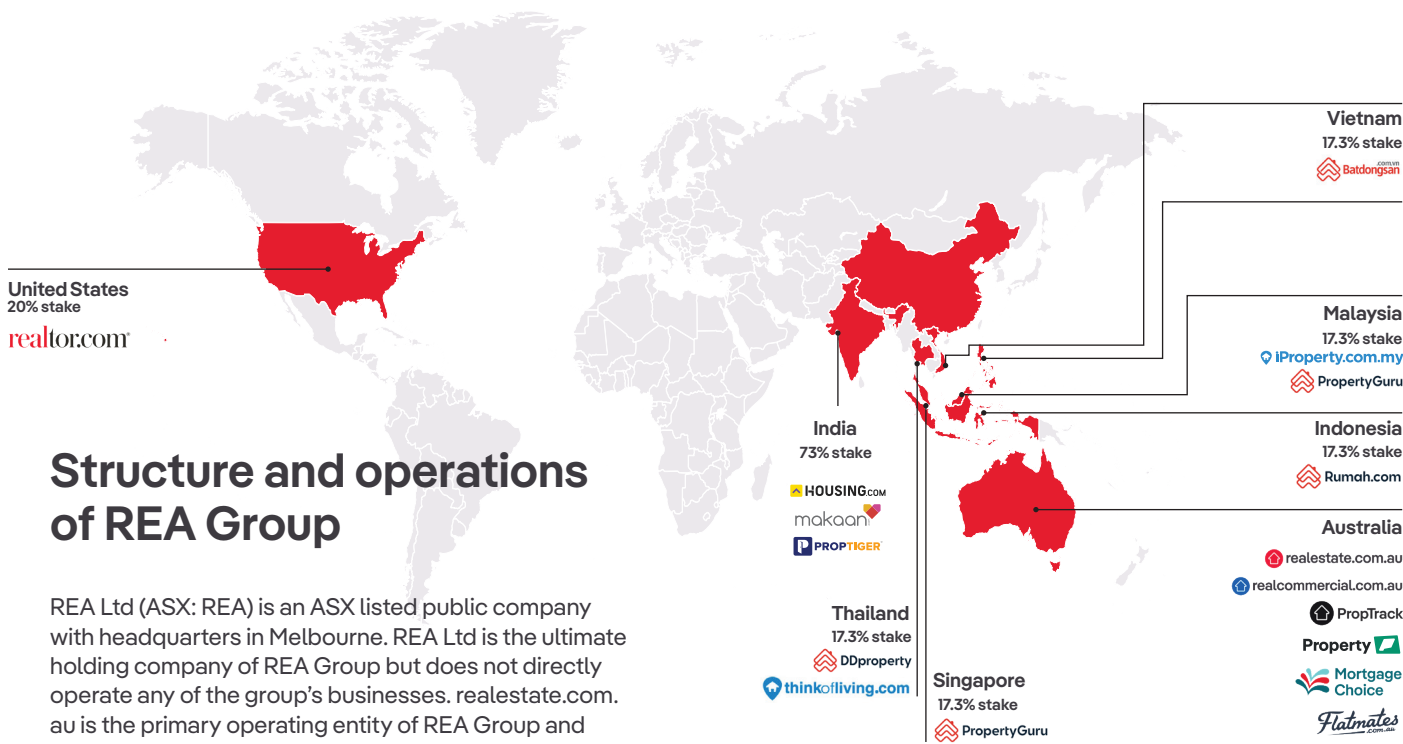
REA Group recognises the importance of combating modern slavery, which adversely affects workers and communities worldwide.

We are committed to respecting and promoting human and labour rights within our operations and supply chains. Doing business in a way that promotes the highest levels of business ethics and integrity is central to how we operate, and REA Group's value of "Do it with Heart" reflects the importance we place on caring for our workforce, customers, consumers and our broader community.

We have developed processes to ensure that we act responsibly and with care to protect against risks of modern slavery. REA Group is committed to taking action to identify, assess and address risks of modern slavery in our operations and supply chains.

# Contents

Section	Requirement	Reference in our Statement
16(1)(a)	Identify the reporting entity	Introduction <b>page 1</b>
16(1)(b)	Describe the reporting entity's structure, operations and supply chains	Structure and operations of REA Group <b>page 3</b> REA Group's supply chains <b>page 5</b>
16(1)(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Overview of modern slavery risks <b>page 7</b> Risks that we cause, contribute to or are linked to modern slavery practices through our operations or supply chains <b>page 8</b>
16(1)(d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Actions taken by REA Group to assess and address modern slavery risks, including due diligence and remediation processes <b>page 9</b> Supplier due diligence for higher risk suppliers <b>page 9</b> Remediation processes <b>page 12</b>
16(1)(e)	Describe how the reporting entity assesses the effectiveness of these actions	Assessing the effectiveness of our actions <b>page 13</b> Key performance indicators <b>page 13</b>
16(1)(f)	Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Consultation between REA Ltd, realestate.com.au, Mortgage Choice and their subsidiaries <b>page 14</b>
16(1)(g)	Provide any other relevant information	Not applicable



## Structure and operations of REA Group

REA Ltd (ASX: REA) is an ASX listed public company with headquarters in Melbourne. REA Ltd is the ultimate holding company of REA Group but does not directly operate any of the group's businesses. realestate.com.au is the primary operating entity of REA Group and is responsible for operating the group's well known property advertising websites in Australia. Mortgage Choice is the franchisor for the Mortgage Choice broking franchise which has operations across Australia.

As at 30 June 2023, REA Group had direct business operations through subsidiaries in Australia and India. REA Group also holds minority shareholdings in Move, Inc., located in the United States, PropertyGuru Group Ltd, a NYSE listed entity which operates businesses in Malaysia, Singapore, Indonesia<sup>2</sup>, Thailand and Vietnam as well as some Australian technology businesses, which are listed in the simplified corporate structure chart for REA Group annexed to this Statement.<sup>5</sup>

### Our workforce

#### Direct workforce

REA Group's direct workforce consists of over 3,300 skilled employees, including software developers and engineers, digital product managers, marketing and sales staff, customer service, finance, risk, procurement, cybersecurity, human resources and legal personnel. These employees are predominantly full-time employees who work from REA Group offices or at home under hybrid work arrangements.

97% of REA employees are on permanent contracts. The remaining 3% are predominantly fixed term roles covering parental leave or for short term projects.

During FY23, REA Group's subsidiary Smartline acted as the franchisor of a mortgage broking franchise which supported 300 Smartline franchisees (who have now all transitioned to operating under the Mortgage Choice brand). Mortgage Choice operated as the franchisor of a mortgage broking franchise which supported 518 Mortgage Choice franchisees.

#### Indirect workforce

REA Group has an indirect workforce consisting of 198 skilled technology contractors based in China, 14 skilled technology contractors based in India and 112 contractors based in Manila, Philippines.<sup>4</sup> These workers are engaged through consultancy companies based in Australia, with service delivery taking place from offshore offices of these consultancies.

#### Main operating activities of controlled entities

#### Key brands

Development and operation of websites and mobile software applications for the advertising of real estate.

Australia: realestate.com.au  
 realcommercial.com.au  
 Flatmates.com.au  
 Property

India: HOUSING.COM  
 makaan  
 PROPTIGER

Development and provision of digital tools and data services for the real estate industry.

Australia: PropTrack  
 realestate.com.au

Provision of mortgage broking services through a network of franchisee brokers and a digital home loan experience.

Australia: Mortgage Choice

<sup>2</sup> PropertyGuru Group Ltd has announced that its business in Indonesia will cease to operate effective 30 November 2023.

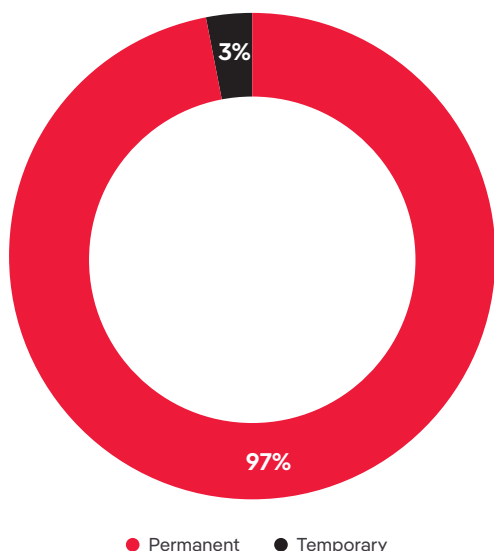
<sup>3</sup> A full list of REA Ltd's subsidiaries is set out at pages 112-113 of [REA Group's 2023 Annual Report](#) and annexed to this Statement.

<sup>4</sup> The contractors based in the Philippines support Mortgage Choice and its franchisees with a range of functions including compliance, franchise operations and broker support.

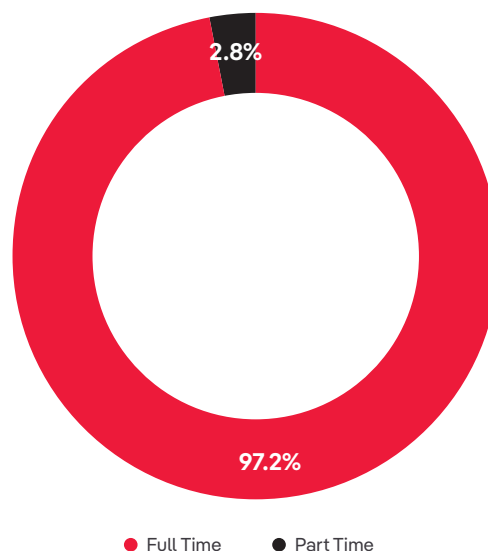
# Structure and operations of REA Group

continued

### REA Group Employees by Contract Type



### REA Group Employees by Role Type



## REA Group's investment activities

As at 30 June 2023, REA Group held a controlling 78.0% interest in REA India Pte. Ltd. (**REA India**), the operator of Housing.com, Makaan.com, and PropTiger.com in India.

REA Group held minority stakes in the following property advertising portals in overseas markets as at 30 June 2023:

- a 20% interest in Move, Inc., the operator of realtor.com in the United States; and
- a 17.3% interest (undiluted) in PropertyGuru Group Ltd, which operates property advertising portals in Malaysia, Singapore, Thailand, Vietnam and Indonesia.<sup>5</sup>

While REA Group generally holds board seats for companies in which it has minority interests, it is not involved in the day-to-day operations of these businesses.

As at 30 June 2023, REA Group also held minority interests in the following Australian-based real estate tech businesses:

- a 26.8% interest (undiluted) in Managed Platforms Pty Ltd, an emerging property management software platform;
- a 37.1% interest (undiluted) in Realtair Pty Limited, a digital platform providing end-to-end technology solutions for the real estate transaction process;
- a 29.4% interest (undiluted) in Campaign Agent Pty Ltd, Australia's leading provider in vendor paid advertising and home preparation finance solutions for the Australian real estate market<sup>6</sup>;
- a 35.2% interest (undiluted) in Simpology Pty Limited, a leading provider of mortgage application and e-lodgement solutions for the broking and lending industries; and
- a 16.7% interest in each of Scaleup Mediafund 2.0 Pty Limited, Scaleup Mediafund Management Pty Ltd and Scaleup Mediafund 3.0 Trust, an Australian dedicated media-for-equity fund.

<sup>5</sup> As noted above, in August 2023, PropertyGuru Group Ltd announced that its business in Indonesia would cease to operate effective 30 November 2023.

<sup>6</sup> REA Group acquired 100% of Campaign Agent Pty Ltd on 5 July 2023.

# REA Group's supply chains

## Operating model

REA Group operates a central procurement team located in Melbourne that is responsible for high value or complex procurement of goods and services, on behalf of REA Group businesses. This team administers several of the key policies addressing supply chain risks, including modern slavery risks. Lower value procurement decisions are decentralised across REA Group's various business units and geographies.

The nature of REA Group's supplier relationships is highly variable. REA Group has written contracts with most suppliers, which are generally on a rolling 1-2 year contract cycle. Some supplier arrangements are subscription based and can be varied or terminated on a short notice period.

REA India operates its own procurement, legal and risk management functions. REA India has adopted policies and procedures which mirror those of REA Group Australia, with localisation as appropriate to comply with local law or custom.

## Overview of REA Group supply chains

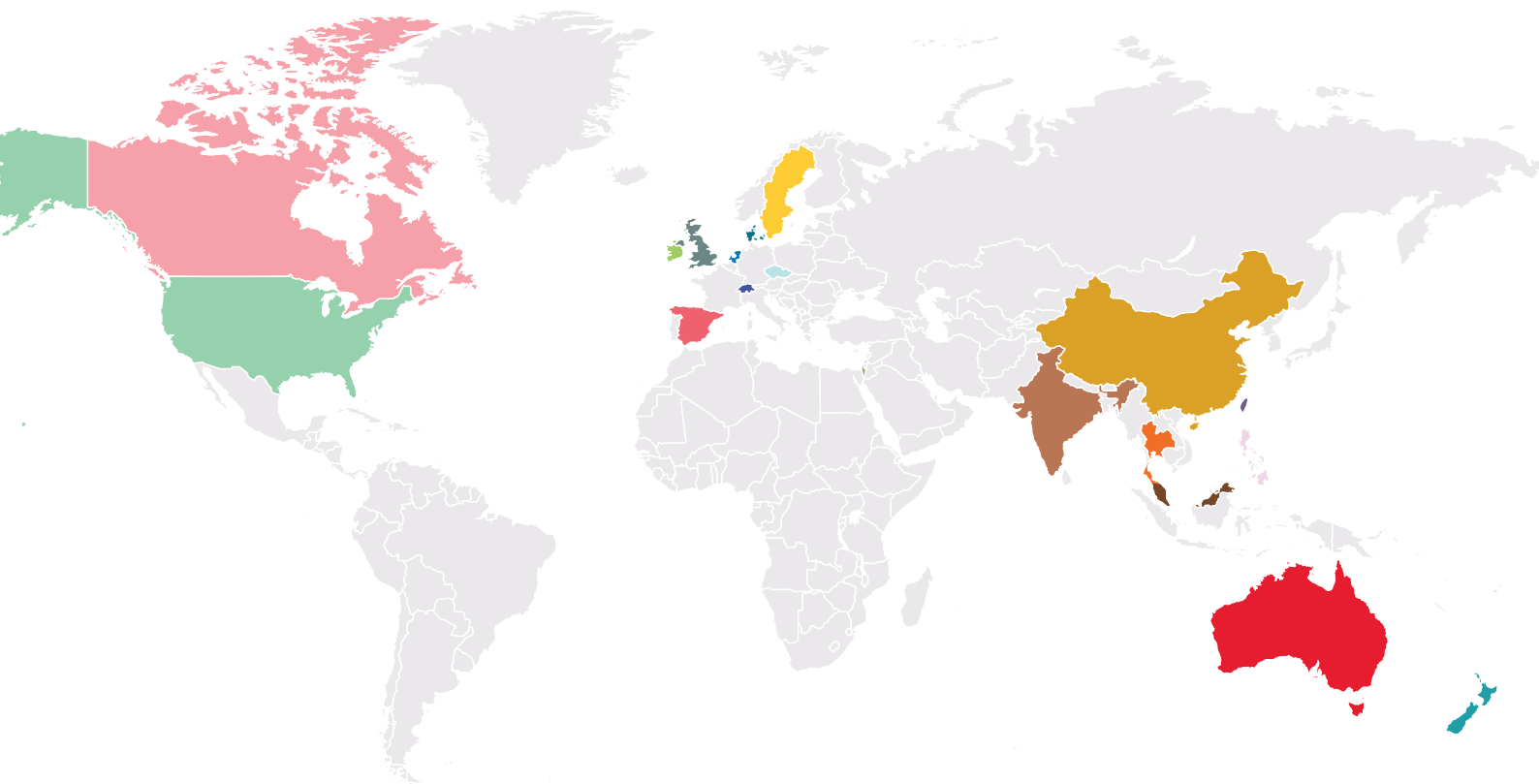
Total tier 1 suppliers engaged in FY23:

**1,357**

Total FY23 spend:

**AUD \$264.2m**

## Location of Tier 1 Suppliers

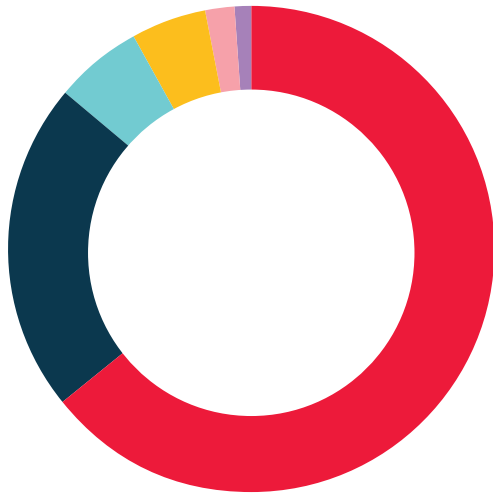


- Australia (778)
- Canada (3)
- Czech Republic (1)
- Hong Kong (2)
- India (472)
- Ireland (11)
- Macau (1)
- Malaysia (1)
- Netherlands (2)
- New Zealand (3)
- Philippines (1)
- Singapore (10)
- Sweden (1)
- Switzerland (1)
- Taiwan (1)
- Thailand (1)
- United Kingdom (9)
- United States (54)
- Israel (1)
- Spain (3)
- China (1)

# REA Group's supply chains

continued

### Tier 1 Supplier Spend by Country



● Australia (65%) ● India (22%) ● United States (6%)  
 ● Ireland (5%) ● Singapore (2%) ● Other (<1%)

### Spend by Procurement Category



● Marketing (28%) ● Business Services (20%)  
 ● Technology (30%) ● Other (11%)  
 ● Facility Services (11%)

Spend Category	Examples of goods and services	Key sourcing countries
<b>Business services</b>	<ul style="list-style-type: none"> <li>External contractors</li> <li>Technology consulting</li> <li>Accounting, audit and legal services</li> <li>Administrative support</li> </ul>	Australia, Singapore, Philippines, United States
<b>Technology</b>	<ul style="list-style-type: none"> <li>Software licences</li> <li>Cloud infrastructure</li> <li>Hardware and data</li> <li>Analytics services</li> </ul>	Australia, Ireland, United States, India
<b>Marketing</b>	<ul style="list-style-type: none"> <li>Media and advertising</li> <li>Creative agencies</li> <li>Sponsorships</li> <li>Events</li> <li>Merchandise</li> </ul>	Australia, United States, India, Ireland
<b>Facilities</b>	<ul style="list-style-type: none"> <li>Rent</li> <li>Office fit out</li> <li>Cleaning and catering</li> </ul>	Australia, India
<b>Other</b>	<ul style="list-style-type: none"> <li>Staff related expenses</li> <li>Travel</li> <li>Entertainment</li> </ul>	Australia, India

# Overview of modern slavery risks

We have carried out a risk assessment of the potential for modern slavery practices within the operations and supply chains of REA Group.

The assessment of modern slavery risks was carried out by representatives from REA Group's central procurement, risk and legal functions, based in Australia, and members of REA India's procurement function. These representatives form part of REA Group's modern slavery governance group.

## Risks in our operations

REA Group is a designer and developer of digital products and software experiences and a provider of mortgage broking services. Due to the nature of REA Group's services, their predominantly online distribution channels and the skilled workers that contribute to them, we consider that the inherent risk of modern slavery practices within our Australian operations is low.

REA India operates in a market which has a higher inherent risk of modern slavery practices due to weaker legal and governance standards. REA India has sought to address the risks of operating in this market by adopting robust policies and due diligence processes, in line with those adopted by REA Group Australia.

## Risks in our supply chains

We have assessed the inherent risk of modern slavery practices in our supply chains, having regard to:

1. the supplier's country of operation;<sup>7</sup>
2. the types of goods or services supplied;<sup>8</sup> and
3. propensity for use of unskilled, transient or migrant labour in the supplier's industry.

These risk factors were identified having regard to third party data sources, such as the Walk Free Global Slavery Index 2018 and 2023 (released May 2023).

Based on the risk assessment that was completed, we have determined that the inherent risk of modern slavery practices within REA Group's contracted supplier relationships is generally low. This is because REA Group's expenditure is weighted toward lower risk supplier categories such as technology (software, data and communications), business services and marketing. REA Group's risk profile is further reduced because a large majority of REA Group's suppliers are based in developed economies with stronger labour laws and lower prevalence of modern slavery practices.

We have identified the following as procurement categories that may carry a higher inherent risk of forced labour, bonded labour or other modern slavery practices:

- **External contractors** – REA Group engages third party consultancies which provide REA Group with specialised software development services from offshore delivery centres based in Xi'an, China and Gurgaon, India<sup>9</sup> as well as administrative support services from Manila, Philippines.
- **Merchandise and branded clothing** – REA Group sources branded clothing for its workers as well as merchandise (pens, notebooks, drink bottles, umbrellas, coffee cups, phone chargers and carry bags) which is distributed to REA Group customers. These goods are typically manufactured in China and may carry elevated modern slavery risks.
- **Cleaning services** – REA Group has contracted cleaning service providers at its offices in Australia and India. Those cleaners work from REA Group's offices but REA Group does not otherwise have direct oversight of their employment arrangements.
- **Computer hardware and peripherals** – REA Group purchases laptops, mobile phones and other computer peripherals through resellers based in Australia. These products may include components or minerals sourced from countries with higher prevalence of modern slavery.
- **General office supplies** – REA Group purchases a range of general office supplies, including coffee, tea, foodstuffs, office furniture, printing materials and stationery which are purchased from generalist retailers. These goods may include materials or components that are sourced from or assembled in developing markets. REA Group has no visibility over these supply chains and limited capacity to conduct due diligence on the suppliers in these procurement categories because the majority of the products are purchased on an ad hoc basis.

<sup>7</sup> With emphasis in FY2023 being on suppliers with operations in countries with a higher vulnerability to modern slavery practices due to weaker governance and labour laws. These are countries with an overall risk rating of > 40.0 in the 2018 Walk Free Global Slavery Index. The list of countries has been reviewed and adjusted following the release of the 2023 Walk Free Global Slavery Index in May 2023.

<sup>8</sup> With a focus on suppliers of electronics, clothing, branded merchandise, cleaning services, local drivers and security services.

<sup>9</sup> There are also a small number of contractors based in other cities in China and India who support the work carried out by the offshore delivery centres.



# Risks that we cause, contribute to or are linked to modern slavery practices through our operations or supply chains

## Risks that we cause modern slavery practices through our operations

We consider the inherent risk that REA Group directly causes forced labour, human trafficking or other modern slavery practices through its operations is low. REA Group's direct workforce in Australia and India consists primarily of highly skilled technology workers, product, sales and marketing staff and business support services staff. These employees are predominantly full-time employees who are employed in accordance with local labour laws, paid fairly at market rates and typically work during business hours from an office setting or at home under hybrid work arrangements.

We also consider the inherent risk of usage of underage or child labour within REA Group's operations to be low. In particular, due to the specialised nature of the digital products created by REA Group, employment candidates have typically completed tertiary study and significantly exceed the minimum working age.

## Risks that we contribute to modern slavery practices through our operations and supply chains

REA Group acknowledges that in the absence of suitable controls, it could contribute to modern slavery practices through:

- unrealistic pricing or delivery expectations for certain procurement categories (eg. branded merchandise and garments); and
- the usage of outsourced labour in developing markets over which REA Group has less control.

Some of the steps taken to address these risks are set out in the sections *Ethical Procurement Training* and *Management of outsourced labour suppliers*.

## Risks that we are linked to modern slavery practices through our operations or supply chains

### Our offshore operations

While REA Group's overall risk profile is low, it is possible that REA Group could be linked to modern slavery practices through its minority and majority stakes in overseas property advertising portals. In particular, portals operating in India, Indonesia, Malaysia, Thailand and Vietnam have a higher inherent risk of being linked to modern slavery practices due to less stringent governance than the standards and processes applied in Australia and a higher prevalence of modern slavery practices in these territories.<sup>10</sup>

Due to the independent operation of the Indonesia, Malaysia, Thailand and Vietnam operations (of which REA Group holds only a minority interest) REA Group did not have direct oversight of the procurement decisions and some facets of the governance structures of these businesses during FY2023. Over the last year, REA Group has uplifted the governance processes and policies of the REA India business (including a new modern slavery framework, whistleblower policy and vendor due diligence process, amongst others) so that they now mirror those of REA Australia.

Notwithstanding that our offshore operations operate in higher risk jurisdictions, we consider that the risk within these operations is inherently low because their workforces consist of skilled professionals who work in an office setting and support the delivery of digital products, websites and mobile software applications. Further, the procurement categories of these businesses are predominantly lower risk technology (software, data and communications), business services and facilities categories.

### Our indirect workforce

As part of its operations, REA Group has an indirect workforce consisting of highly skilled technology contractors based in Xian, China and Gurgaon, India and administrative contractors based in Manila, Philippines. These contractors are engaged through consultancy companies based in Australia, with service delivery taking place from offshore offices of these consultancies. Given that REA Group does not directly employ these workers, set their working conditions, or manage the offshore delivery centres, there is a higher inherent risk of modern slavery amongst this workforce. Two of these suppliers completed third party social audits during FY2022 (see *Supplier Due Diligence*).

<sup>10</sup> Walk Free Global Slavery Index 2018, p.156-8, 178-9.

# Actions taken by REA Group to assess and address modern slavery risks, including due diligence and remediation processes

## Assessing modern slavery risks within REA Group's supply chains

### Supplier risk assessments

A high-level risk assessment of new REA Group suppliers<sup>11</sup> on-boarded during FY2023 was conducted based on the following criteria:

1. the supplier's country of operation;
2. the types of goods or services supplied; and
3. propensity for use of unskilled, transient or migrant labour in the supplier's industry.

These criteria were used to identify suppliers which had an elevated inherent risk of modern slavery practices. During FY2023, REA Group Australia identified 1.5% of its active tier one suppliers that met one or more of the identified risk factors. The suppliers flagged under the risk assessment included organisations with operations or supply chains in Australia, India, the Philippines, Nigeria and Ukraine, with goods and services provided by those suppliers including cleaning services, administrative support, software development and consulting and merchandise sourcing.

REA India completed a similar risk assessment across its suppliers, with 5% of its tier one suppliers shortlisted. This included suppliers providing outsourced labour, merchandise, IT procurement and electronics.

### Supplier due diligence for higher risk suppliers

REA Group has adopted further due diligence measures for suppliers assessed as having a higher inherent modern slavery risk.



During FY2023, a Supplier Assessment Questionnaire was sent to the REA Group Australia and REA India tier one suppliers which met one or more of the identified risk factors (as outlined above). The questionnaire comprises 25 questions relating to the policies and procedures of the supplier, their supply chain visibility, modern slavery responsibility, training programs, response processes and employment conditions. The questionnaire also requires explicit acceptance of the REA Group Supplier Code of Conduct and disclosure of any instances of non-compliance with the Code.

The completed Supplier Assessment Questionnaires were reviewed by members of REA Group Australia's legal and procurement teams and REA India's procurement team. The review did not reveal any indicators or instances of modern slavery practices within the shortlisted group of suppliers.

However, a small number of suppliers in India were flagged as providing insufficient information in response to the questionnaire (refer *Results of supplier screening* below).

REA Group takes a flexible approach to reviewing responses to questionnaires, having regard to the supplier's industry and size. REA Group looks for indicators of poor governance or exploitative labour practices across all questionnaire responses but does not expect small suppliers to have the same systems and frameworks as large suppliers. For example, we would not necessarily expect small suppliers to have a formal human rights or modern slavery policy or specific staff training programmes for modern slavery. However, REA Group would expect that all suppliers have processes to check that they are not using child labour, that they are not retaining workers' documentation and that they provide their employees with pay slips and a contract of employment in a language they understand. For suppliers of goods, we would also expect there to be a level of visibility around the sourcing of products and a pathway toward increasing visibility of supply chains, including through due diligence programs.

### Results of supplier screening

	 REA Group	 REA India
Questionnaires sent	13	13
Suppliers cleared	13	7
Suppliers flagged	0	5
Withdrawn	0	0
Deactivated vendors	0	1

<sup>11</sup> The risk categories were determined by reference to the Walk Free Modern Slavery Index 2018.

## Actions taken by REA Group to assess and address modern slavery risks, including due diligence and remediation processes

continued

In Australia, REA Group sent questionnaires to 13 tier one suppliers. All 13 suppliers were cleared based on questionnaire responses. In addition, two suppliers were also cleared based on publicly available materials.

REA India sent questionnaires to 13 suppliers and all responded. Of the suppliers that completed questionnaires, five suppliers did not supply sufficient information and/or documentation in response to the questions included in the modern slavery questionnaire. REA India has requested that these five suppliers provide further information and, depending on REA India's satisfaction with the information provided, the suppliers may be asked to undertake a modern slavery compliance training module. One supplier has been deactivated as the project it was working on has now been completed.

### Supplier audits

In FY2022, REA Group engaged Elevate, a leading provider of sustainability and supply chain services, to conduct social audits of two suppliers based in China and the Philippines. The suppliers provide outsourced software development and outsourced administrative support respectively for REA Group's Australian businesses. The social audits were conducted in accordance with the Elevate Responsible Sourcing Assessment (ERSA) methodology.

The social audits made findings in relation to working hours and administrative and record keeping practices. These matters were addressed through corrective action plans implemented during FY2023. The social audits did not identify any modern slavery risks or practices.

REA Group did not conduct any supplier audits during FY2023.

## Addressing modern slavery risks within REA Group's supply chains

### Supplier Code of Conduct

REA Group's [Supplier Code of Conduct](#) sets out the minimum standards required of suppliers in the areas of workers' rights and human rights, anti-bribery and anti-corruption laws and other laws in relation to business integrity, privacy, health and safety, and environmental considerations. Suppliers must also have adequate policies and procedures in place to monitor compliance with these laws and must ensure that any authorised sub-contractors also comply with these minimum standards. REA India has adopted a similar Supplier Code of Conduct for its suppliers.

All new suppliers must agree to REA Group's Supplier Code of Conduct as part of supplier onboarding or REA must be satisfied that the supplier complies with equivalent obligations pursuant to its own internal policies and procedures. REA also sends periodic reminders to all its suppliers about compliance with the REA Group Supplier Code of Conduct, with the latest email reminder sent in June 2023.

In FY2023, REA Group continued to embed compliance with the Supplier Code of Conduct, and related audit obligations, into the contracts of certain suppliers that were deemed to carry an elevated risk of modern slavery practices based on our risk assessment criteria.

### Contractual clauses

REA Group's standard form supplier agreements include appropriate modern slavery clauses requiring suppliers to comply with the REA Group Code of Conduct, take reasonable steps to identify, assess and address risks of modern slavery practices in their operations and supply chains and to promptly remediate any harm to impacted individuals which is uncovered as a result of these due diligence processes. Where REA Group is contracting on a supplier's standard contract terms and the supplier falls within REA Group's risk criteria, REA Group will seek to include modern slavery compliance clauses in the contract.

### Ethical procurement training

Since FY2021, all members of REA Group's central procurement team have completed ethical procurement and supply training provided online by the Chartered Institute of Procurement & Supply.

This training is undertaken to ensure that REA Group procurement personnel can recognise indicators of modern slavery practices and that REA Group can address the risk that it could contribute to modern slavery practices through unrealistic expectations about the price or delivery timeframes to be met by suppliers.

# Addressing modern slavery risks within REA Group's supply chains

continued

## Annual employee compliance training

In FY2022, REA India incorporated an interactive modern slavery training module into its annual compliance refresher course. To date, the training has been completed by 1,587 employees of REA India (99.94% of employees).

In FY2023, REA Group Australia implemented a similar module into its annual new employee onboarding training and refresher compliance training.<sup>12</sup> The training was completed by 1,439 employees (98% of employees).

## Supplier training

In FY2023, REA Group did not request any supplier to complete a modern slavery training module. REA India is awaiting further information from the 5 suppliers that were flagged as part of the supplier screening before determining whether to request that these suppliers undertake further training.

## Management of outsourced labour suppliers

REA Group has a number of practices which provide oversight of day to day working conditions for outsourced workers:

- realestate.com.au employees have regular video conferences with software developers at the Xi'an and Gurgaon delivery centres;
- Smartline and Mortgage Choice mortgage brokers have direct 1:1 relationships with outsourced administrative support staff in the Philippines and communicate on a daily basis;
- REA Group's expenditure with the outsourced providers is in line with market rates; and
- REA Group completed onsite audits of one supplier in China and one in the Philippines during FY2022. While no modern slavery issues were identified, corrective action plans were implemented for these suppliers during FY2023 for working hours and administrative and record keeping practices (see *Supplier Audits*).

## Addressing modern slavery risks within our operations

### REA Group Australia Policy Framework

REA Group has a detailed governance and policy framework which significantly reduces the risk of modern slavery practices within REA Group's direct workforce and operations. This includes:

- REA Group's Modern Slavery Policy and Framework;
- the REA Group [Code of Conduct](#), Employment Handbook and Equality in Employment Policy which together set out the behavioural standards required of all REA Group employees. The Code of Conduct

also applies to contractors, consultants and visitors working for REA Group;

- the REA Group [Risk Management Policy](#) which sets out the framework for identifying and managing strategic, operational, compliance and regulatory risk across REA Group's businesses;
- the REA Group Procurement Policy which sets out the process for engaging and onboarding new suppliers, including relevant management approvals;
- REA Group's Contract Approval Procedure which requires a business lead to obtain approvals from legal, risk, procurement and finance business partners before a new contract can be signed by management;
- the Permanent Residency at REA Group Policy which sets out the circumstances in which REA Group will sponsor employees for permanent residency;
- REA Group's anti bribery and corruption program and its related policy; [Doing Business Ethically and with Integrity](#); and
- REA Group's [Whistleblower Policy](#).

This policy framework assists in embedding a strong culture of compliance across REA Group's operations. REA Group's policies and processes are periodically reviewed to ensure they remain fit for purpose.

### REA India Policy Framework

REA India has its own localised policies, which closely align to the corresponding policy framework of REA Group Australia. This includes the:

- REA India Modern Slavery Policy and Framework;
- REA India Supplier Code of Conduct;
- REA India Whistleblower Policy; and
- REA India Employee Code of Conduct.

REA India has also adopted REA Group Australia's Risk Management Policy.

### Employee onboarding controls

REA Group has controls which reduce the risk that we could inadvertently employ individuals that are under the minimum working age.

In REA Group's Australian operations, an underage candidate would be identified through our employee screening process, including through the interview stage, completion of tax authority forms or through photo identification provided by candidates.

In India, REA India's Human Resources Information System does not allow for the creation of profiles or release of employment offers to individuals aged under 18 years.

<sup>12</sup> Employees who have been at REA Group Australia for more than 12 months are required to complete annual refresher compliance training.

# Addressing modern slavery risks within REA Group's supply chains

continued

## Assessing modern slavery risks within REA Group investments

REA Group does not have processes for assessing modern slavery risks within businesses in which it holds only a minority interest.

REA India utilises the same risk assessment processes and procedures as REA Group Australia.

## Remediation processes

### Whistleblower Policy

REA Group's [Whistleblower Policy](#) allows for anonymous reports to be made by REA Group employees, officers, consultants, sub-contractors and suppliers and their employees (and all relatives, dependents and spouses of these individuals) in relation to conduct that is illegal, fraudulent, corrupt, unethical, or that entails unsafe work practices, abuse of authority or other acts that are inconsistent with REA Group values and behaviours, including modern slavery practices such as people trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment and child labour. REA India retains its own Whistleblower policy covering the operations of the Indian businesses housing.com, proptiger.com and makaan.com. It is published on each of these websites and has been brought to the attention of local staff and contractors.

Reports can be made to the REA Group Executive Leadership Team, Chief Risk Officer or anonymously to the Chair of the Audit, Risk and Compliance Committee, via the independently operated Safecall whistleblower hotline (available in Australia and India) or by making a report online at [www.safecall.co.uk/report](http://www.safecall.co.uk/report) (available to individuals located in all regions). Separate to the REA Group channels, individuals can also make disclosures to any of the individuals specified under the whistleblower protection laws (e.g. any director or company secretary of REA Ltd or a related body corporate, legal practitioners for the purposes of obtaining legal advice, auditors or regulatory bodies, amongst others).

The REA Group Whistleblower Policy and Safecall whistleblower hotline were brought to the attention of high-risk suppliers through the Supplier Assessment Questionnaire as well as via an email communication sent to all REA Group suppliers in June 2021. The Whistleblower Policy was also brought to the attention of REA Group employees and external contractors based in Xian, China via a blog post and newsletter published in June 2022.

REA Group has not received any reports of modern slavery risks or breaches of the Supplier Code of Conduct, via its whistleblower channels.

## Responding to reports of modern slavery

REA Group will promptly investigate any reports through the above channels which relate to potential violations of labour laws or reports of forced labour, child labour or other modern slavery practices. REA Group will respect the privacy and communication preferences of any complainant during the investigation of any report, including by preserving anonymity of complainants where requested and following up with the complainant after any investigation.

## Responding to indicators of modern slavery or poor governance practices

If REA Group's supplier due diligence reveals process deficiencies or areas of concern in a supplier's practices, we will work proactively with the supplier to improve its governance and practices. If areas of concern are not remedied, REA Group will reassess its future relationship with the relevant supplier, and outcomes may include suspension or termination of supplier relationships.

In FY2023, REA India flagged five suppliers due to incomplete information/documentation being provided and has asked for follow up documentation from all of these suppliers. If REA India is not satisfied the documentation meets REA India's governance processes, it will ask these suppliers to complete a modern slavery training module to uplift their awareness of modern slavery issues.

Where suppliers are flagged using REA Group's risk assessment criteria, but decline to complete REA Group's supplier assessment questionnaire, REA Group will endeavour to assess the supplier based on publicly available materials such as human rights statements, modern slavery policies, ethical sourcing and conflict minerals policies. Where this is not possible, REA Group will deactivate the supplier, so that new orders cannot be placed by employees until due diligence has been completed.

## Supplier feedback

REA Group has made available a contact point for concerns or feedback concerning its Supplier Code of Conduct through its central procurement team. Some suppliers have indicated that they will comply with the standards of their own analogous code of conduct, instead of REA Group's Code. In such situations, REA Group reviews the supplier's code of conduct to ensure it contains equivalent obligations and protections.

# Assessing the effectiveness of our actions

## FY2023 KPIs

In FY2022, REA Group formed a modern slavery governance group comprising representatives from its shared procurement, risk, legal and sustainability functions. The modern slavery governance group met two times in FY2023 and included representatives of the REA Ltd, realestate.com.au, Mortgage Choice and REA India businesses.

Based on the criteria disclosed in REA Group's FY2022 Modern Slavery Statement, below is an update on REA Group's performance against its key performance indicators.

	Key performance indicator	FY2022	FY2023
Training	The percentage of REA Group's central procurement team that have received ethical procurement and supply training.	100%	100%
	The percentage of REA India's procurement team that have received ethical procurement and supply training.	100%	100%
Supplier engagement	The number of Supplier Assessment Questionnaires issued.	73	26
	The number of Supplier Assessment Questionnaires completed.	53 <sup>13</sup> (73%)	25 <sup>14</sup> (96%)
	The percentage of Supplier Assessment Questionnaires with governance concerns flagged/incomplete information.	11% (8)	19% (5)
	The number of modern slavery issues identified.	0	0
Grievances	The number of whistleblower complaints related to modern slavery risks received each year.	0	0
Remediation	The number of remediation actions taken with suppliers.	0	0 <sup>15</sup>

## FY2024 KPIs

In FY2024 REA Group will continue to assess the effectiveness of its modern slavery governance processes based on the following KPIs.

	Key performance indicator
Training	The percentage of REA Group and REA India's procurement team that have received ethical procurement and supply training.
Supplier engagement	<ul style="list-style-type: none"> <li>- The number of Supplier Assessment Questionnaires issued and completed each year;</li> <li>- The percentage of Supplier Assessment Questionnaires with concerns flagged;</li> <li>- The number of suppliers who complete a training module; and</li> <li>- The number of suppliers audited.</li> </ul>
Grievances	The number of whistleblower complaints related to modern slavery risks received each year.
Remediation	The number of remediation actions taken with suppliers.

<sup>13</sup> A further 8 multinational tech hardware suppliers were cleared based on publicly available materials, without completing the questionnaire.

<sup>14</sup> A further 2 multinational tech hardware suppliers were cleared based on publicly available materials, without completing the questionnaire.

<sup>15</sup> No remediation actions were taken as there were no identified instances of modern slavery. However, REA India is engaging with 5 suppliers to obtain additional information and documentation relating to the suppliers' governance processes. Depending on REA India's satisfaction with the information provided, the suppliers may be asked to undertake a modern slavery compliance training module.

## Assessing the effectiveness of our actions

continued

### FY24 Action Plan

REA Group has identified the following as intended actions during FY2024:

- Further embedding the Supplier Code of Conduct into the contracts of higher risk suppliers, as those contracts come up for renewal; and
- Expanding modern slavery training modules to higher risk suppliers.

## Consultation between REA Ltd, realestate.com.au, Mortgage Choice and their subsidiaries

In preparing this Statement, REA Group's modern slavery governance group consulted with procurement, risk, legal and sustainability representatives for REA Group's Australian businesses and with procurement and risk representatives from REA India. This included video conferences with responsible personnel in relevant REA Group business units, which was supplemented with written feedback.

The core modern slavery governance group comprises representatives of the REA Ltd and realestate.com.au entities and a procurement representative of the REA India business.

The boards of directors of REA Group Ltd, realestate.com.au Pty Limited and Mortgage Choice Pty Ltd have each reviewed and approved this Statement for the year ended 30 June 2023 on 3 December 2023.



Hamish McLennan  
Chairman  
[REA Group](#)



Owen Wilson  
CEO and Executive Director  
[REA Group Ltd and realestate.com.au Pty Limited](#)  
Executive Director  
[Mortgage Choice Pty Ltd](#)

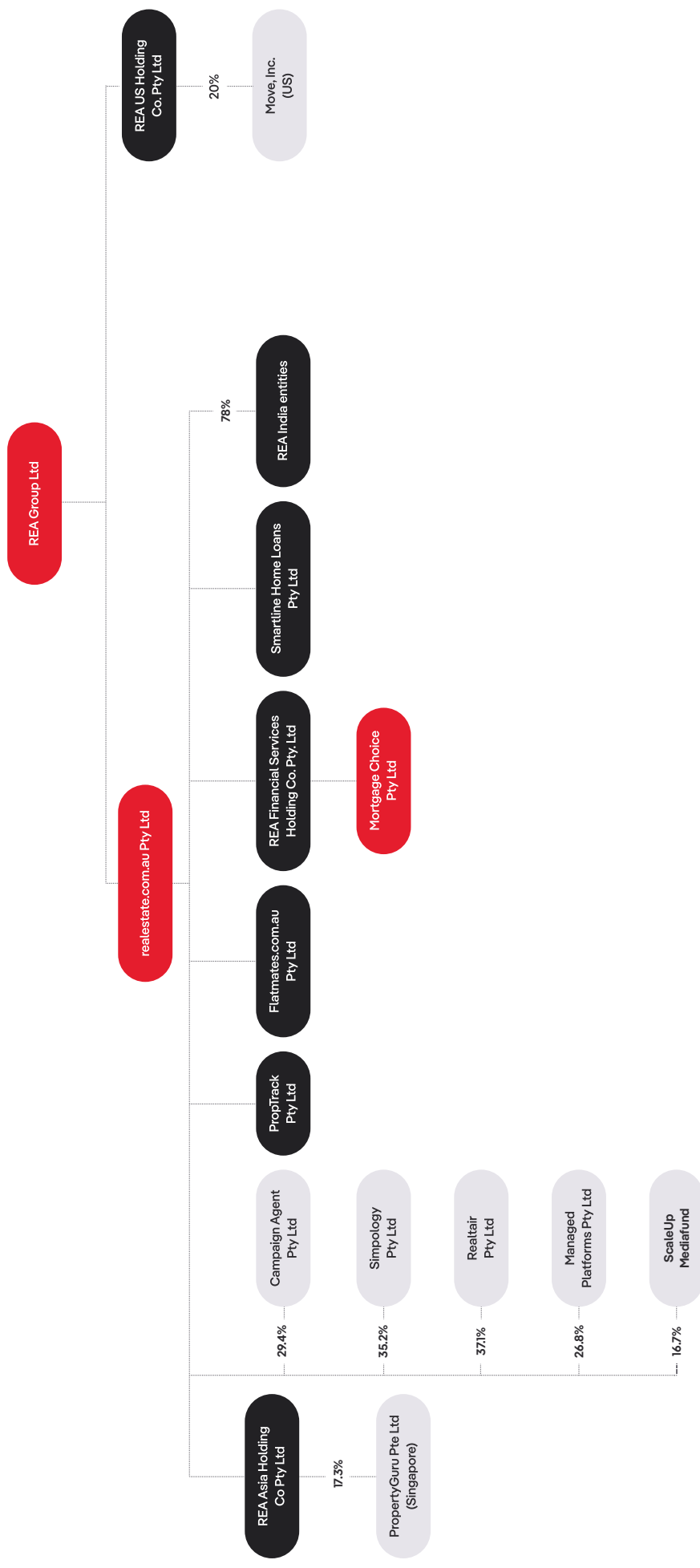
Registered Office  
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# Annexure – REA Group subsidiaries as at 30 June 2023

Name of entity	Country of incorporation	Equity Holding 2023 %	Equity Holding 2022 %
REA US Holding Co. Pty Ltd	Australia	100	100
realestate.com.au Pty Limited	Australia	100	100
iForm Online Pty Ltd	Australia	–	100
Flatmates.com.au Pty Ltd	Australia	100	100
PropTrack Pty Ltd	Australia	100	100
NOVII Pty Ltd	Australia	56.2	56.2
HomeGuru Finance Pty Ltd	Australia	56.2	56.2
REA Financial Services Holding Co. Pty Ltd	Australia	100	100
Mortgage Choice Pty Ltd	Australia	100	100
FinChoice Pty Limited	Australia	100	100
Help Me Choose Pty Limited	Australia	100	100
realestate.com.au Home Loans Mortgage Broking Pty Ltd	Australia	100	100
Smartline Home Loans Pty Ltd	Australia	100	100
Smartline Operations Pty Limited	Australia	100	100
REA Asia Holding Co. Pty Ltd	Australia	100	100
iProperty.com Events Sdn. Bhd.	Malaysia	100	100
Think iProperty Sdn. Bhd.	Malaysia	–	100
REA Hong Kong Management Co Limited	Hong Kong	100	100
GoHome H.K. Co. Limited	Hong Kong	–	100
SMART Expo Limited	Hong Kong	–	100
Big Sea International Limited	British Virgin Islands	100	100
GoHome Macau Co Ltd	Macau	100	100
REA Group Hong Kong Limited	Hong Kong	100	100
REA HK Co Limited	Hong Kong	100	100
REA Group Consulting (Shanghai) Co., Limited	China	100	100
Austin Bidco Pty Ltd	Australia	100	100
iProperty Group Pty Ltd	Australia	100	100
iProperty Group Asia Pte. Ltd.	Singapore	–	100
REA India Pte. Ltd.	Singapore	78.0	73.3
Locon Solutions Private Limited	India	78.0	73.3
Realty Business Intelligence Private Limited	India	–	73.3
PropTiger Marketing Services Private Limited	India	78.0	73.3
Aarde Technosoft Private Limited	India	–	73.3
Makaan.com Private Limited	India	–	73.3
Oku Tech Private Limited	India	62.5	58.6
Blue Sword Real Estate Buying and Selling Brokerage One Person LLC	United Arab Emirates	78.0	73.3
<b>Associates</b>			
Move, Inc.	United States	20.0	20.0
Managed Platforms Pty Ltd	Australia	26.8	27.5
ScaleUp Mediafund 2.0 Pty Limited	Australia	16.7	16.7
ScaleUp Mediafund Management Pty Ltd	Australia	16.7	-
ScaleUp MediaFund 3.0 Trust	Australia	16.7	-
Realtair Pty Limited	Australia	37.1	35.8
Campaign Agent Pty Ltd	Australia	29.4	29.8
Simpology Pty Limited	Australia	35.2	35.2
PropertyGuru Group Limited	Grand Cayman	17.3	17.5



# Annexure – REA Group simplified corporate structure



- Entities make a joint statement under Modern Slavery Act 2018 (Cth)
- Entities covered by the REA Group Ltd, realestate.com.au and Mortgage Choice joint statement under Modern Slavery Act 2018 (Cth)
- Entities in which REA Group holds a minority interest (as at 30 June 2023)

