

Modern Slavery Statement

Document Control

Document History

Version	Date	Section	Amendment	Author
1	15/10/2024	All	Initial draft	Binal Shah

Next Review Date: November 2025

Bluestone will review and may update the Modern Slavery Statement annually. Readers should ensure that they are viewing the latest version.

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This Modern Slavery Statement is prepared in accordance with section 14 of the Modern Slavery Act 2018 (Cth) and outlines our commitment to preventing and addressing modern slavery risks within our operations and supply chains.

1. Introduction and Overview

Bluestone Home Loans is a leading provider of non-conforming home loans in Australia. Our mission is to offer financial solutions to clients who may not qualify for traditional home loans due to unique or challenging financial circumstances.

Bluestone is committed to preventing and addressing modern slavery risks within our operations, business relationships and extended supply chains. Bluestone is committed to fair, ethical and responsible business practices. Bluestone supports fundamental principles of human rights, and at a minimum, abides by the human rights-related laws of the countries in which we operate.

2. Modern Slavery Risks

We have conducted a risk assessment to identify potential areas where modern slavery risks could arise. Key areas of focus include:

2.1. Procurement / Supply Chain

Our supply chain includes various third-party service providers such as legal firms, valuation agencies, professional services and technology vendors that support our lending and loan servicing functions.

We have an established Supplier Management Framework which provides guidance on the selection, management and monitoring of third party suppliers. This framework includes a method by which vendors are classified, a due diligence process for all new vendors and an annual attestation process for all material vendors regarding their compliance with modern slavery laws and regulations.

2.2. People

Bluestone's day-to-day operations are relatively removed from industries and products more commonly associated with modern slavery, such as raw material intensive industries, or physical products that have a predominant overseas manufacturing and sourcing component. Bluestone is domiciled in Australia, which is considered a low-risk jurisdiction due to its strong labour protections and modern slavery legislation. Bluestone also has an office in the Philippines which mainly consists of Lending and Servicing support employees.

All employees are employed in accordance with the applicable local labour laws. All Bluestone employees are required to comply with Bluestone's Code of Conduct.

3. Actions Taken

3.1. Policies and Procedures

Bluestone is committed to identifying, mitigating and eliminating the risks associated with modern slavery in our business and in our supply chains. In addition to a standalone Modern Slavery Policy, we have established and implemented the following policies to help support mitigation of Modern Slavery risks:

- Employee Code of Conduct
- Anti-Money Laundering / Counter-Terrorism Financing Program
- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Third Party Sourcing Policy

3.2. Procurement / Supply Chain

Bluestone is committed to making sure that it does not engage suppliers that breach Modern Slavery legislation. Bluestone completes due diligence for all new outsourced arrangements (covering anti-money laundering, modern slavery and other business ethical checks), as well as a comprehensive annual attestation questionnaire for all material vendors.

Where possible, Bluestone supplier contracts include a clause pertaining to Modern Slavery requiring the Supplier to:

- Provide commitments to eradicating Modern Slavery within its own supply chains;
- Warranting that it has not been convicted of a Modern Slavery offence; and
- Have completed its own due diligence on its supply chain.

Additionally, we reserve the right to terminate any contractual arrangement if there is a breach of these above clauses or Modern Slavery laws.

3.3. People

We have a number of procedures in place in relation to our employees to proactively manage any risk. The following procedures are followed:

- carrying out detailed background checks;
- ensuring all contracts comply with all legal requirements regarding workers' rights; and
- employees are paid in accordance with applicable legislation and industrial instruments including the Fair Work Act 2009 (Cth).

3.4. Training

Annually and as part of the onboarding process, all employees are required to complete training with online assessments across areas such as Code of

Conduct, Fraud and Economic Crime, Whistleblower protection, WHS awareness and Global Anti Bribery and Corruption.

4. Assessing Effectiveness

Internal Review

The Modern Slavery Policy is reviewed on an annual basis and through this process we may revise procedures that support the overall policy based on prior year performance. For example, enhancement of the annual attestation process based on supplier feedback.

Incident Reporting and Response

Modern slavery related incidents are reported, recorded and addressed through the standard Incident reporting process. Any incidents relating to Modern Slavery are used to inform us of any potential issues with our policies or processes that need to be addressed and rectified.

Training and Awareness

We are continually monitoring completion of annual training to ensure these are being done both when joining Bluestone and then annually on the employee's anniversary date.

5. Future Commitments and Actions

We acknowledge that addressing modern slavery is an ongoing process. Challenges include ensuring comprehensive oversight across all suppliers and adapting practices to evolving and emerging risks. We are committed to continuously improving our practices and addressing any identified gaps. We are committed to enhancing our efforts to combat modern slavery including:

- **Policy Updates:** Regularly reviewing and updating our policies to align with emerging best practices and legislative changes. This includes reviewing our code of conduct to ensure it includes explicit commitments to ethical labour practices and human rights.
- **Training:** Enhancing training modules and reviewing whether specific Modern Slavery training can be incorporated into existing training.
- **Supplier:** Review whether any further enhancements can be made to the supplier due diligence and annual attestation process.

6. Approval and Sign-Off

This statement reflects our ongoing commitment to addressing modern slavery risks in our operations and supply chains. It has been developed in consultation with key stakeholders across all entities in scope, including the Executive Team.

It has been approved by the company's Audit and Risk Committee on 24 October 2024 and was approved by the Board of Directors on 18 December 2024.

Signed:

Mark Jones

Mark Jones
Chief Executive Officer
Bluestone Home Loans
19/12/2024

For further inquiries, please contact us at riskandcompliance@bluestone.com.au.