

FINDEX

Modern Slavery Statement

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Statement

This Modern Slavery Statement, made by Findex (Aust) Pty Ltd (Findex), is the first statement to be made in compliance with the *Modern Slavery Act 2018 (Cth) (the "Act")* and has been prepared in respect to the financial year ending 30 June 2020.

Findex acknowledges responsibility under the Act and will ensure transparency in respect to the organisation and its suppliers of goods and services. As a good corporate citizen, Findex is dedicated to operating in an ethical and law-abiding manner and expects our suppliers to share these values. We seek to minimise the risk of modern slavery occurring in our operations and supply chains.

The purpose of this statement is to outline Findex's approach to ensuring our business and supply chains are conducted within a framework that mitigates modern slavery risk. Findex is committed to continuous improvement and taking proactive steps to ensure that modern slavery does not occur in our own business and supply chains.

The Board of Directors have validated this statement and the approach to be compliant with the Act.

Our structure and operations

Findex (Aust) Pty Ltd ABN 84 006 466 351 is a subsidiary of Findex Group Limited ABN 40 128 588 714. As one of the largest privately-owned providers of integrated financial advisory and accounting services in Australia and New Zealand, Findex has close to 3,000 staff, geographical dispersed throughout 100 offices. With \$17bn under advice, our team has more than 30 years' experience delivering business advisory, wealth management, audit, performance consulting, accounting and tax services. Findex is the fifth largest accounting firm in Australia and 95% of our Partnership group across Australia and New Zealand are equity holders in our business.

Findex exists to enrich the lives of the people, businesses and communities we work with through smart solutions, a one best way approach and an integrated delivery method via our Family Office model (Diagram 1). Findex understands the importance of a holistic service offering that enables its clients to meet their goals, needs and expectations.

This approach encompasses:

-  Wealth Management
-  Specialist Services, including Specialist Tax
-  Self-Managed Super Fund
-  Business Advisory
-  Lending
-  Corporate Finance
-  Tax Advisory
-  Audit and Assurance
-  Accounting
-  Corporate Benefits
-  Risk Insurance and General Insurance
-  Risk and Management Consulting

Findex Group Ltd is governed by a Board. The Board has ultimate responsibility for the Group's internal quality control and risk management.

The responsibility for managing the day-to-day operations of the Group is held within the management team. This includes responsibility for developing, implementing and monitoring quality control and risk-related matters. The management team comprises Senior Management and regional Executive Managing Partners.

Supply chains

Findex's supply chains consist of goods and services which support our corporate operational departments and client facing services lines. Findex largely operates in a sector that is generally considered a low risk for modern slavery, however, we recognise we can be indirectly exposed to modern slavery risks through our supply chains.

The majority of goods and services Findex procures are acquired from locally based suppliers in our operating countries of Australia and New Zealand.

Excluding remuneration, our major categories of procurement include:

- Rent and Infrastructure (Facilitates Management: cleaning, parking, energy, etc.).
- IT and Communications (including software).
- Professional Fees (consultancy, audit fees, etc.).
- Travel and Entertainment.
- Marketing and Merchandising.
- General Office Costs (postage, stationery, etc.).
- Human Resources (professional development, recruitment, staff welfare, etc.).

Findex has several policies in place which guide our staff and promote a culture of compliance, honesty, and ethical behaviour. The most relevant policies and procedures we have in place, which mitigate against the risk of modern slavery, include:

- Code of Conduct.
- Whistleblower Policy.
- Fraud and Corruption Policy.
- Expense Authorisation and Payment Policy.

Findex has developed and is implementing a Modern Slavery Action Plan to ensure we comply with the Act and the Reporting Requirement. In addition, our procurement strategic plan for 2021 includes the development of a Procurement Policy to formally document the established procurement processes currently undertaken when onboarding suppliers. Before the introduction of the Act, these assessment processes included legal, IT, risk and privacy reviews to ensure suppliers were compliant with best practices in their respective fields.

More recently, additional supplier assessments have included consideration of a supplier's social, environmental and ethical impacts.

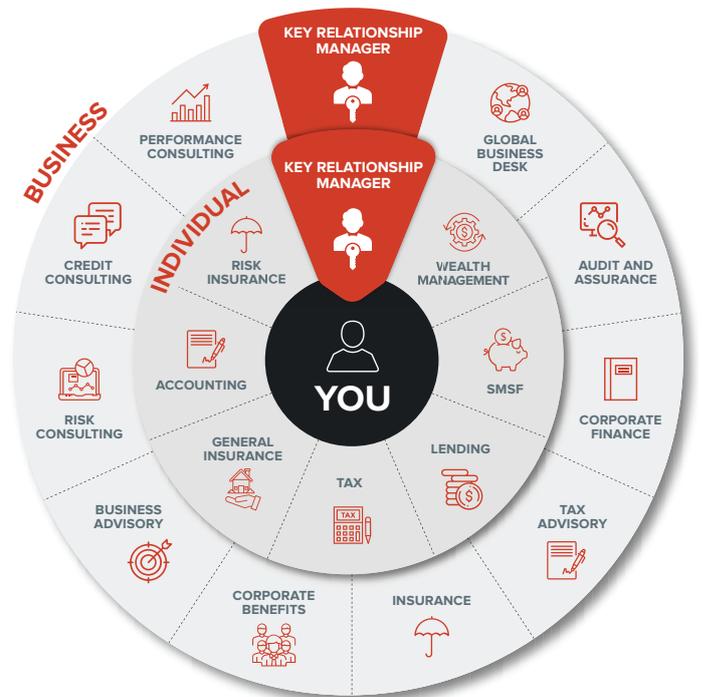


Diagram 1: Integrated delivery method via our Family Office model

Recognising that our greatest risk of modern slavery is in our supply chains, Findex has established and commenced implementing processes to review our risk across current and potential future supply chains for all corporate departments and service lines. More specifically, these include risk screening for all existing and future suppliers in relation to modern slavery compliance. Once the risk level has been determined for a supplier, Findex has committed to undertaking remedial actions as required.

In our preliminary assessment, we have identified some procurement categories which pose a higher risk of modern slavery, including:

- Facility service providers (e.g. cleaning and premises maintenance).
- Information Technology hardware.
- Findex branding office suppliers, which may have been sourced offshore (e.g. Findex branded garments) – (reference: Global Slavery Index).
- Offshore suppliers.

Findex has a whistleblowing facility which allows employees to report instances of improper conduct. The Whistleblower Policy comprises several policies and codes that promote a culture of compliance, honesty and ethical behaviour within Findex.

During FY2020, there were no reports of modern slavery within Findex operations or supply chains. If modern slavery related issues are identified, we will work with the supplier to develop corrective actions with agreed deliverables and time-frames as part of a remediation plan.

Findex has adopted a continuous improvement approach to our modern slavery processes. During FY2021, our key focus will be:

- Continued organisational-wide awareness and stakeholder engagement on the modern slavery compliance requirements. This includes the delivery of awareness training on modern slavery to Findex staff and our suppliers.
 - Undertake a risk screening on existing suppliers using the information captured in the Department/Service Modern Slavery registers. This includes assessing existing suppliers and future suppliers to provide sufficient information that can differentiate between low, medium and high-risk categories of procurement relating to modern slavery compliance.
 - Distribute a modern slavery questionnaire to suppliers who pose a higher risk of modern slavery. This can be utilised as a tool to assist Findex and our suppliers to:
 - Identify and assess modern slavery risks in Findex's procurements.
 - Identify mitigation efforts to combat the risk of modern slavery in Findex's procurements.
 - Foster collaboration between Findex and our suppliers to address these risks.
- Introduce Findex's first Modern Slavery Policy, which will document key processes and procedures for identifying modern slavery risk and assessing the risk of modern slavery in the procurement of goods and services, including:
 - Findex's supplier risk assessment and process of identifying and assessing modern slavery risks in our operations and supply chains, and prospective suppliers.
 - A process to monitor higher modern slavery risk suppliers and mitigate associated risks.
 - An agreed procedure for responding to modern slavery cases.
 - A definition of the metrics Findex will use to assess our effectiveness in combatting modern slavery risk in our operations and supply chains.
 - Incorporation of modern slavery compliance requirements into procurement contractual processes.



Spiro Paule
**Managing Director &
Chief Executive Officer**
Findex Group Limited
24 February 2021



Tony Roussos
**Executive Director &
Chief Operations Officer**
Findex (Aust) Pty Ltd
24 February 2021