

Domain  
Group

Modern Slavery  
Statement

2022



# Domain Group Modern Slavery Statement 2022

## 1. Introduction

### This Statement

This modern slavery statement (**Statement**) is made by Domain Holdings Australia Limited ABN 43 094 154 364 (**Domain**) and covers Domain and its subsidiaries as at 30 June 2022 (**Domain Group**). The members of the Domain Group are listed in the schedule to this Statement.

This Statement is Domain's modern slavery statement for the purposes of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

The purpose of this Statement is to outline the Domain Group's approach to ensuring that its business is conducted within a framework that minimises modern slavery risks in its operations and supply chains.

### Reporting entity

Domain is the reporting entity for the purposes of this Statement.

This Statement covers the Domain Group. Except where noted otherwise in this Statement, arrangements referred to as those of the Domain Group in this Statement are those of all members of the Domain Group.

### Reporting period

This Statement covers the reporting period from 1 July 2021 to 30 June 2022 (**Reporting Period**).

## 2. The Domain Group's Commitment to Human Rights

Domain is committed to conducting its activities in a manner that respects human rights.

Domain recognises that modern slavery can occur in different ways and can take many forms, including slavery (where powers relating to the right of 'ownership' are exercised) and slavery-like practices including servitude, forced labour and deceptive recruiting for labour or services. Domain is aware that the devastating health and economic crisis caused by the COVID-19 pandemic has increased the risk of modern slavery and other forms of exploitation for many people and communities.

Domain also recognises that freedom from servitude is a fundamental human right. Domain respects human rights and is committed to conducting the Domain Group's activities in a manner that supports human rights across all of its operations.

Domain's approach to human rights is based on doing business in a way that respects the rights and dignity of people, avoids human rights abuses and upholds applicable legal requirements. Domain's position on human rights is informed by the United Nations (**UN**) Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights and the UN Global Compact and has been documented in Domain's Human Rights Policy, available at Domain's Shareholder Centre website at [shareholders.domain.com.au](https://shareholders.domain.com.au).

Domain expects high standards of human rights performance across the Domain Group's operations and supply chains. Domain recognises the Domain Group's ability to impact and influence the human rights of a variety of its stakeholders, including in its role as a provider of products and services, as an employer, and as a procurer. Domain is committed to working closely with its stakeholders to identify and understand the Domain Group's impacts, to ensure negative impacts are reduced and positive impacts are enhanced.

### 3. Structure of the Domain Group

Domain is a public company registered under the *Corporations Act 2001* (Cth) (**Corporations Act**) and listed on the Australian Securities Exchange (ASX:DHG) with statutory revenue in the Reporting Period of \$357.0 million.

Domain's registered office is located at Level 5, 100 Harris Street, Pyrmont, New South Wales 2009.

Domain's largest shareholder is Nine Entertainment Co. Holdings Limited (ASX:NEC), with a 60.06% shareholding.

The members of the Domain Group are listed in the schedule to this Statement and include wholly-owned subsidiaries and joint ventures. All but two of the members of the Domain Group are companies incorporated in Australia.

As at 30 June 2022, the Domain Group had approximately 1,125 employees, the majority of which are ordinarily based in Australia.

During the Reporting Period (in April 2022), Domain acquired (via a subsidiary) Realbase Pty Ltd, the largest real estate campaign management technology platform in Australia and New Zealand. Realbase has operations and employees in New Zealand and the Philippines, which became those of the Domain Group. Further information in relation to business acquisitions by Domain during the Reporting Period is set out below.

### 4. Operations of the Domain Group

Domain is an online property marketplace that provides a range of solutions, services and data to consumers, agents and other stakeholders with an interest in the Australian commercial and residential property markets.

Domain is home to one of the largest portfolios of property technology brands in Australia under one roof, which makes it well placed to continue to innovate and add value to consumers, agents, developers, corporates, government and other players in the broader property industry.

The Domain Group's business consists of Domain and its subsidiaries including companies operating the Allhomes, BidTracker, Commercial Real Estate, Domain Home Loans, Homepass, Insight Data Solutions, Pricerfinder, Real Time Agent and Realbase brands.

Domain's purpose is to inspire confidence in life's property decisions and Domain delivers this by offering a suite of products and solutions for every step of the property journey.

Headquartered in Sydney, the Domain Group is driven by a group of passionate people based all across Australia with offices in Melbourne, Canberra, Brisbane, Perth and Adelaide and operations in New Zealand and the Philippines. Domain's values drive its strong culture, and Domain is committed to ensuring it acts in a way that supports the environments it works in, and its customers who live in those environments.

### 5. Supply Chains of the Domain Group

The Domain Group's supply chains consist of a range of suppliers supplying goods and services predominantly in the following industries:

- Cloud and software services;
- Advertising and media including media agencies, advertising platforms, social media platforms;
- IT hardware and telecommunications;
- Print services and distribution;
- Data and information services;
- Outsourced labour services;
- Professional services such as legal, investment banking, tax, accounting and recruitment; and
- Building services and office equipment.

The Domain Group's material suppliers (determined by value of expenditure) are mainly based in Australia, the United States of America, Ireland, the United Kingdom, New Zealand and Singapore.

Beyond this substantive group of suppliers, there are a few suppliers in other overseas jurisdictions that are rated low for prevalence of slavery practices in the Global Slavery Index and a very small number in other jurisdictions that are rated slightly higher for prevalence of slavery practices, including the Philippines and India. In this Statement, Domain has identified the additional steps the Domain Group takes for suppliers in these higher rated jurisdictions.

## 6. The Domain Group's Risks of Modern Slavery Practices in Operations and Supply Chains

Domain has undertaken assessments of modern slavery risks in the Domain Group's operations and supply chains over the Reporting Period. Having undertaken these assessments, Domain considers that the risk of modern slavery practices in the Domain Group's operations and supply chains is low, primarily due to the following key factors:

<b>People</b>	<p>The Domain Group's main asset is its people.</p> <p>Domain Group employees are for the most part skilled professionals working in Australia.</p> <p>As noted above, Domain acquired Realbase during the Reporting Period. Some Realbase staff are ordinarily based in New Zealand and the Philippines. Post-acquisition, these persons are Domain Group employees.</p> <p>Domain considers New Zealand to be a comparable jurisdiction to Australia in relation to modern slavery risks (it being ranked #164 on the Global Slavery Index Prevalence Index of estimated prevalence of modern slavery by country, with Australia ranked #163).</p> <p>Domain acknowledges that modern slavery risks in the Philippines may be higher. Domain Group employees ordinarily located in the Philippines are also for the most part skilled professionals, working in the technology industry.</p> <p>Domain Group employees, wherever they are located, are managed and supported through a centralised Domain People Experience team and employment processes, and as noted below Domain adopts a 'group-wide' approach to assessing modern slavery risks in its operations.</p>
<b>Operations</b>	<p>Domain Group products are principally online and primarily developed within Australia under the oversight of Domain's People Experience (for personnel) or Product and Technology (for outsourced labour) functions.</p> <p>Technology and product work undertaken overseas is done:</p> <ul style="list-style-type: none"> <li>• For Realbase staff – by persons ordinarily based in New Zealand or the Philippines and employed by a Domain Group member incorporated in that country; or</li> <li>• Otherwise, for a small amount of such work – through an outsourced labour hire supplier that has been subjected to various checks in accordance with Domain's modern slavery risk assessment process (detailed below in section 7(ii) of this Statement ("Undertaking supplier assessments")).</li> </ul>
<b>Supply chains</b>	<p>The Domain Group sources third party goods and services from reputable suppliers located primarily in low risk countries.</p> <p>The nature of the goods and services that it procures are not typically the type that are at risk of slavery and human trafficking.</p>

Notwithstanding the above, in assessing Domain Group's operations and supply chains over the Reporting Period, Domain identified three main factors that may increase the risks of modern slavery in Domain Group's operations and supply chains:

<b>Geographic risks</b>	Domain's offshore workforce and use of offshore outsourcing arrangements, particularly where the personnel are ordinarily located in higher risk countries.
<b>Sector and industry risks</b>	Domain's purchase of branded employee clothing and goods (assessed in light of the textiles and fashion industry having high modern slavery risks because of its characteristics, products and processes).
<b>Acquisition risks</b>	<p>Domain's acquisition of businesses with existing operations and supply chains that may involve the Domain Group being exposed to modern slavery risks not previously present in its operations and supply chains (such as Domain acquiring businesses with workforces located offshore in a jurisdiction in which the Domain Group has not previously operated).</p> <p>During the Reporting Period, Domain acquired Insight Data Solutions (in October 2021) and Realbase (in April 2022). Realbase's operations included staff ordinarily located in New Zealand and the Philippines.</p>

Section 7(iii) of this Statement ("Identifying risk areas and taking actions to address them") sets out steps taken by Domain in order to manage these risk areas.

## 7. Actions and Procedures Undertaken in Reporting Period to Assess and Address Modern Slavery Risks

During the Reporting Period, Domain continued to implement elements of its pre-existing modern slavery framework and enhanced its practices. In addition, Domain adopted new processes, and identified areas for enhancement in future reporting periods.

The following specific actions and procedures were undertaken in the Reporting Period to assess and address modern slavery risks:

- (i) Actively implementing relevant policies, including Domain's Supplier Code of Conduct;
- (ii) Undertaking supplier assessments;
- (iii) Identifying key risk factors and taking action to manage them;
- (iv) Improving governance and oversight of modern slavery risks;
- (v) Maintaining relevant working groups, systems and processes; and
- (vi) Enhancing its people experience processes.

Further information in relation to these actions and procedures is set out below.

### i. Actively implementing relevant policies, including Domain's Supplier Code of Conduct

#### **Policies**

In addition to the Human Rights Policy noted above, the Domain Group has formal policies in place that promote ethically and legally compliant business conduct, both internally and within its supply chains, including:

- Code of Conduct;
- Speak Up (Whistleblower) Policy;
- Anti-Bribery and Corruption Policy; and
- Supplier Code of Conduct.

The first three of these policies pertain to Domain's operations and are applicable to all Domain Directors, employees and contractors, among others.

The Supplier Code of Conduct applies to Domain's supply chain, and sets out minimum standards that the Domain Group expects of its suppliers.

Copies of these policies are available at Domain's Shareholder Centre website at [shareholders.domain.com.au](http://shareholders.domain.com.au).

During the Reporting Period, the first of these three policies were added to a Domain staff intranet for easy reference by Domain Group staff.

## **Supplier Code of Conduct**

The Supplier Code of Conduct sets out minimum standards that the Domain Group expects of suppliers, including that they not engage in, or tolerate the use of forced, bonded, compulsory labour, slavery or human trafficking, the use or threat of physical or other punishment, or the physical, sexual or psychological abuse or inhumane treatment of workers.

The specific actions Domain took to in the Reporting Period in order to ensure suppliers accepted and complied with the Supplier Code of Conduct are set out in this Section:

### **Onboarding**

Throughout the Reporting Period, prior to onboarding, Domain provided new suppliers with Domain's Supplier Code of Conduct and requested that they acknowledge and agree to comply with its terms. Where a supplier did not agree to do so, Domain's Finance function contacted the supplier to assess their specific concerns regarding the Code and determine whether they were an appropriate supplier for the Domain Group. There were limited circumstances in which suppliers who refused to comply with Domain's Supplier Code of Conduct were approved for onboarding. For example, where a supplier refused to adopt Domain's Supplier Code of Conduct because they had their own equivalent company-wide policies, Domain may have chosen to onboard the relevant supplier without an express adoption of Domain's Code. As a general rule, suppliers were expected to adopt Domain's Code as a condition of being accepted into Domain's supply chain.

### **Enforcement**

In addition to the onboarding process, Domain Group suppliers are regularly reminded of the Supplier Code of Conduct.

During the Reporting Period, Domain continued to send the Supplier Code of Conduct by email to suppliers every six months. Suppliers continue to be asked to take the time to read and familiarise themselves with the Supplier Code of Conduct and are encouraged to contact Domain if they have any concerns or are unable to comply with the Supplier Code of Conduct for any reason.

Supplier assessments were also undertaken in respect of material suppliers – see section 7(ii) of this Statement ("Undertaking supplier assessments").

As noted above, during the Reporting Period, Domain acquired the Insight Data Solutions and Realbase businesses. The suppliers of these entities were included in the first 'reminder' of the Supplier Code of Conduct after acquisition for consistency across the Domain Group.

Some members of the Domain Group are joint ventures that are not wholly-owned by Domain. Where Domain's Finance team does not directly manage onboarding of suppliers to these entities, the team liaises with its joint venture partners and completes 'spot checks' to identify any gaps in Domain's processes to ensure suppliers to these joint ventures, like suppliers of wholly-owned Domain Group members, agree to and are captured in regular reminders of the Supplier Code of Conduct.

## **ii. Undertaking supplier assessments**

During the Reporting Period, Domain maintained its existing process of reviewing material suppliers in the Domain Group's supply chain every 6 months, including material suppliers of both Domain and the other members of the Domain Group.

As in the previous reporting period, materiality was measured by value of expenditure. The review covered 40 suppliers that collectively represented approximately 75% of the procurement expense of the Domain Group, and suppliers assessed as potentially being in higher categories of risk (such as due to their geographical locations).

Suppliers were assessed for risks of modern slavery practices based on:

- The supplier's country of registration;
- The types of services and industry;
- Feedback supplied by Domain's own staff (including from physical or virtual inspections of the supplier's premises and working environments);
- Whether the supplier has a published modern slavery statement (or otherwise has published information in relation to modern slavery risks in its supply chains); and
- Other readily available public information and information provided by the Supplier.

Applying this risk framework, Domain was able to identify material suppliers to the Domain Group that were considered 'no risk' or 'low' risk.

### iii. Identifying key risk factors and taking actions to manage them

As noted above, Domain has identified three main risks factors for modern slavery in relation to its operations and supply chains: geographic risks, sector and industry risks, and acquisition risks. Domain recognises that its modern slavery risk is heightened by its recent acquisition of a sizable workforce in the Philippines, as well as its use of outsourced labour services to countries that have a higher risk rating than Australia.

During the Reporting Period, Domain undertook actions to assess and address these risks:

#### **Geographic risks**

**Employees in the Philippines:** As noted above, during the Reporting Period, Domain acquired Realbase. Realbase has a subsidiary company (Realbase Inc.) incorporated in the Philippines, the employing entity for Realbase staff ordinarily located in the Philippines. These staff members are now Domain Group employees.

Prior to the acquisition, Domain undertook extensive due diligence in relation to Realbase, including engaging Philippines lawyers to review Realbase's employment practices and other operations in the Philippines.

Since completing the acquisition, all offshore employees who joined the Domain Group as a result of the acquisition have been brought under the oversight of Domain's group-wide People Experience function which (among other things) is responsible for ensuring that Domain's employment practices are fair and compliant with Domain's Human Rights Policy. Domain is continuing its work with its lawyers in the Philippines to ensure compliance with local industrial relations law and Domain Group's employee experience standards.

**Outsourced labour hire:** Domain utilises outsourced labour hire arrangements for a small amount of technology and product work. Domain acknowledges that modern slavery risks may exist due to unfair working conditions for people who are employed by third party labour hire companies.

In acquiring outsourced labour hire services, Domain undertakes a variety of steps (depending on the circumstances and geographic location) to ensure that the supplier is reputable and will provide a safe environment for its labour force.

Examples include Domain conducting reference checks on the supplier's reputation, having the supplier complete a questionnaire that focuses on human rights and safe working environments, having the supplier acknowledge and agree to the Supplier Code of Conduct, checking if the supplier has relevant company policies in place, visiting the overseas site or having the supplier provide photographs of working environments.

#### **Sector and industry risks**

Throughout the Reporting Period, Domain maintained a working group that reports to the Chief People & Sustainability Officer and assesses potential suppliers where Domain has been considering acquiring goods that may fall into higher risk categories, for example employee branded clothing (such as t-shirts, sweatshirts, hats), or branded merchandise (such as water bottles, coffee cups, stickers).

This group takes into account a number of factors, including:

- the country of origin;
- whether the supplier is a reputable supplier;
- the quality of the materials; and
- the environmental impact of the goods.

These are initial checks that are undertaken before the supplier proceeds to the centralised supplier assessment process undertaken by Domain's Finance function described above.

In addition, during the Reporting Period Domain adopted internal 'Swag Guidelines', which apply to anyone wishing to order merchandise (clothing, drinkware, stationery and similar items) for or on behalf of anyone at the Domain Group, or organising any merchandise for employees. These Guidelines set out a process to order 'swag' under the oversight of Domain's People Experience function to ensure, among other things, the minimisation of risks of modern slavery in the Domain Group's supply chains, consistent with the Domain Group's commitment to human rights. Applying the Swag Guidelines, Domain has selected a supplier of 'swag' which meets the Domain Group's standards for human rights throughout their production operations. Domain declined to purchase merchandise from two alternative suppliers on the basis that they did not meet Domain Group's standards.

### **Acquisition risks**

As noted above, during the Reporting Period, Domain acquired two existing businesses: Insight Data Solutions (in October 2021) and Realbase (in April 2022).

Following acquisition, Domain incorporated suppliers of the acquired businesses into the Supplier Code of Conduct and supplier assessment processes noted above to maintain consistency across the Domain Group.

Domain assessed modern slavery risks in the operations and supply chains of Insight Data Solutions and Realbase, as these became those of the Domain Group. Domain considered that Domain's risks of modern slavery practices remain low following these acquisitions. Most suppliers and employees of these businesses are located in Australia or New Zealand and are not of a higher risk profile (such as by geographic risk or sector and industry risk) compared to suppliers of the other members of the Domain Group.

The actions Domain Group took during the Reporting Period to manage the geographic risk factors involved in the Realbase acquisition, are detailed above under "Geographic risks".

#### **iv. Improving governance and oversight of modern slavery risks**

The Domain Group has senior leaders who are responsible for human resources, risk and legal compliance. Those senior leaders report to the Chief Executive Officer, who in turn reports to the Domain Audit and Risk Committee and the Domain Board of Directors.

During the Reporting Period, Domain developed and adopted a formal plan:

- to guide the preparation and lodgment of this Statement; and
- to establish a committee composed of key members of its Executive Leadership Team (including its CFO, Group General Counsel & Company Secretary and Chief People & Sustainability Officer) to oversee this process (the **Modern Slavery Statement Committee** or **MSS Committee**).

The plan was presented to the Domain Board of Directors.

The MSS Committee met multiple times during the Reporting Period to approve the plan, consider existing actions, identify 'bottlenecks' and consider improvement opportunities. Domain will maintain this process and its focus on continuous improvement for the next reporting period (the financial year ending 30 June 2023).

#### **v. Maintaining relevant working groups, systems and processes**

Domain has an internal team within its Finance function that is responsible for identifying and implementing robust procurement processes for the Domain Group and identifying and managing any identified risks within the supply chain as part of the supplier on-boarding process. There is also a team responsible for undertaking the spot checking process that is described in this Statement to identify any lapses or weaknesses in the Domain Group's internal processes and any risks that may have developed since a supplier was onboarded.

In addition to the above working groups that form part of its Finance function, Domain's People Experience team has an internal team that is responsible for ensuring that Domain follows appropriate hiring practices and that Domain employees' working conditions in Australia and abroad are safe and fair.

In addition to the MSS Committee described above, during the Reporting Period, Domain facilitated regular and open communication between its Finance, Legal and People Experience functions to provide a forum to consider modern slavery risks and opportunities for improvement.

The MSS Committee and each of the working groups described above use systems and processes to ensure that relevant information is collected and stored appropriately and can be reviewed and verified, if required. For example, records of supplier acknowledgement and agreement to the Supplier Code of Conduct are stored in Domain's finance system either automatically as part of the standard supplier onboarding process or uploaded manually so these are stored in a common, easily-accessible location.

#### **vi. Enhancing its people experience processes**

During the Reporting Period, Domain's People Experience team have implemented systems and processes to ensure that all Domain employees are recruited with the full knowledge of the role that they will undertake and appropriate checks are undertaken to ensure that employees are over the age of 18, have appropriate rights to work and are paid a reasonable wage for the work that they do.



As noted above, Domain has grown by acquiring existing businesses, where employees have already been recruited. Where Domain has acquired businesses with existing employees, post-acquisition recruitment for these businesses will be done in the same way.

## 8. Assessment of Effectiveness of Actions

Domain is committed to continuous improvement. During the Reporting Period, it identified its modern slavery framework as a key area for development and focused on assessing the effectiveness of its actions and identifying areas for development and enhancement.

During the Reporting Period, Domain assessed the effectiveness of the Domain Group's actions to assess and address modern slavery risks through:

- Dedicated governance oversight;
- Spot checking suppliers;
- Employee engagement monitoring;
- Monitoring whistleblowing complaints; and
- Information sharing and feedback loops.

Further information in relation to these actions and procedures is set out below.

### ***Dedicated governance oversight***

As noted above, during the Reporting Period, Domain developed and adopted a plan to guide the preparation and lodgment of this Statement and established the MSS Committee comprised of key members of its Executive Leadership Team to oversee Domain's anti-modern slavery practices and reporting.

Among other things, in overseeing the preparation of this Statement, the MSS Committee reviewed Domain's existing practices and reflected on their efficacy and suitability in light of the Domain Group's current modern slavery risk profile.

Domain will also prepare a plan for its statement for the next reporting period (the financial year ending 30 June 2023) and as part of this will maintain its focus on identifying how its actions are making a difference.

### ***Spot checking suppliers***

Domain Group is committed to maintaining an ongoing dialogue with its suppliers on modern slavery. Domain undertakes bi-annual monitoring and spot-check assessments of existing suppliers to Domain Group. These monitoring activities enable Domain to determine whether its existing practices remain effective in maintaining a supply chain free of modern slavery.

### ***Employee engagement monitoring***

Domain undertakes biannual staff engagement monitoring. Among other things, all staff are encouraged to complete engagement surveys which assist Domain in gauging whether its operations are conducted in a manner that is supportive of the rights and dignity of its workers.

Engagement surveys include questions regarding the perceived fairness of pay and working conditions, including the availability of appropriate levels of flexibility and autonomy. Responses to these questions assist Domain in identifying any unfair or inappropriate managerial practices.

### **Monitoring whistleblowing complaints**

#### **Whistleblowing**

Domain has a Speak Up Policy (**Whistleblower Policy**). The Speak Up Policy, including details of the Speak Up Hotline (the **Stopline Hotline**), is available at Domain's Shareholder Centre website at [shareholders.domain.com.au](http://shareholders.domain.com.au). The Stopline Hotline is a confidential, independent, externally managed hotline which also enables whistleblowing reports to be made anonymously.

In addition to the Speak Up Policy, Domain has internal Whistleblower Guidelines which are intended to support and guide those receiving, coordinating or investigating whistleblower reports, as well as those wishing to investigate whistleblower reports under the Speak Up Policy. Domain has created Whistleblower Guidelines for those involved in receiving, coordinating or investigating a whistleblower report, or wishing to make reports and for recipients of Whistleblower reports.

#### **Employee reports of unethical business practices**

Under the Speak Up Policy, the Audit and Risk Committee or the Board (as applicable) is to be provided with additional information about material incidents that are appropriate to be escalated to that Committee or the whole Board, subject to legally required levels of confidentiality.

### **Information sharing and feedback loops**

Domain has established a number of information and feedback loops to ensure staff are empowered to raise their views regarding the effectiveness of Domain's anti-modern slavery actions.

For example, during the Reporting Period:

- A process was established for regular engagement and feedback between Finance, Legal and People Experience functions – key areas within Domain with responsibility for Domain's procurement and employment practices;
- The MSS Committee met on multiple occasions to consider existing actions, identify 'bottlenecks' to efficacy and consider improvement opportunities;
- Domain hired a Sustainability Officer whose role includes considering modern slavery risks as a core part of Domain's sustainability agenda. Among other things, the Sustainability Officer monitors reporting trends and emerging risks and is tasked with communicating these to key staff within Domain to guide Domain's assessment of the effectiveness of its actions; and
- The Chief People & Sustainability Officer and representatives from Finance and Legal functions met with business units throughout Domain to discuss sustainability matters, including modern slavery risks. These meetings raised awareness about Domain's responsibilities in this area, the importance of its actions and procedures and provided attendees with contact details of staff who Domain employees can contact to raise modern slavery questions and concerns with.

These conversations and feedback loops enable appropriate staff to collate insights from frontline workers as to whether existing anti-modern slavery practices remain appropriate and effective.

Domain recognises and understands the importance of the Modern Slavery Act and is committed to reviewing and assessing the risks in its operations and supply chain and testing the effectiveness of its processes and approach to identify risks and drive change.

Over the course of the coming reporting period (the financial year ending 30 June 2023), Domain will continue to review its supplier arrangements and procurement processes, and as noted above will maintain its dedicated committee to consider these matters, guided by a plan presented to the Domain Board of Directors.

## 9. Process of Consultation with Owned or Controlled Entities

This Statement has been made in consultation with and is made on behalf of all members of Domain Group.

Subsidiary members of the Domain Group – many of which do not have physical operations or assets – are subject to the same policies as Domain and have Domain-nominated Directors on their Boards. Domain Group members use the same centralised Supplier Procurement, Treasury and Finance teams for onboarding any material suppliers, and use the same centralised Domain people experience team for managing and supporting personnel. Those centralised functions, in turn, report to Domain management. As part of its consultation process with Domain Group subsidiaries, Domain has engaged with those Directors on the subsidiary Boards and the centralised functional teams and the members of Domain management that they report to.

Some non-wholly owned Domain Group members are joint ventures between Domain and other parties. Domain's joint venture partners have responsibilities in relation to accounting and other functions in relation to businesses conducted by these Domain Group members. Where these Domain Group members do not use Domain centralised functions for supplier arrangements, Domain teams liaise with Domain's joint venture partners in relation to these arrangements to complete the actions and processes set out in this Statement, such as to regularly remind Domain Group suppliers of the Supplier Code of Conduct.

As noted above, during the Reporting Period, Domain acquired (via a subsidiary) Realbase. Realbase has subsidiary companies incorporated in New Zealand and the Philippines. Domain is in the process of integrating Realbase into the Domain Group, including bringing its operations under shared Domain functions. In the next reporting period (the financial year ending 30 June 2023), this integration process will include greater interaction between Domain centralised function teams and those in the Realbase business, including consultation on modern slavery risks and other matters.

Domain considers that it has undertaken an effective consultation process that reflects the relationship between the members of the Domain Group and has effective oversight of the activities, people and supply chains of the whole of the Domain Group. The Company Secretary of Domain, who is also the Company Secretary of many (but not all) members of the Domain Group, has participated in the process of preparing this Statement.

## 10. Approval of this Statement by Principal Governing Body of Reporting Entity

This Statement has been approved by the Domain Board of Directors in their capacity as the principal governing body of Domain on 16 August 2022.

## 11. Signature

This Statement is signed by Jason Pellegrino in his role as CEO and Managing Director of Domain on 16 August 2022.



Jason Pellegrino  
CEO and Managing Director of Domain  
16 August 2022

# Schedule: Domain Group members

Group member name	Country of incorporation	ABN
Domain Holdings Australia Limited	Australia	43 094 154 364
Alldata Australia Pty Ltd	Australia	44 144 020 744
All Homes Pty Limited	Australia	50 093 012 652
Australian Capital Territory Real Estate Media Pty Limited	Australia	12 602 692 491
Australian Property Monitors Pty Limited	Australia	42 061 438 006
BH Two Pty Ltd	Australia	–
Bidtracker (NSW) Pty Ltd	Australia	75 632 740 955
Bidtracker (VIC) Pty Ltd	Australia	85 611 220 823
Bidtracker Holdings Pty Ltd	Australia	35 620 961 702
Bidtracker IP Pty Ltd	Australia	–
Campaigntrack Limited	New Zealand	–
Campaigntrack Pty Ltd	Australia	93 142 537 988
Commercial Real Estate Holdings Pty Limited	Australia	66 605 826 677
Commercial Real Estate Media Nominees Pty Limited	Australia	68 602 681 818
Commercial Real Estate Media Pty Limited	Australia	74 602 679 863
Commercialview.com.au Pty Limited	Australia	84 159 552 771
Digital Home Loans Pty Limited	Australia	39 619 694 156
Domain Group Finance Pty Limited	Australia	89 619 554 602
Domain Insure Pty Ltd	Australia	19 619 826 096
Homepass Australia Pty Ltd	Australia	16 602 046 480
Homepass Pty Ltd	Australia	90 600 128 327
IDS Gov Services Pty. Ltd.	Australia	47 629 959 333
Insight Data Solutions Holdings Pty. Ltd.	Australia	21 165 379 644
Insight Data Solutions Pty Ltd	Australia	35 151 319 694
MarketNow Payments Pty Ltd	Australia	68 645 651 967
Metro Media Publishing Pty Ltd	Australia	29 141 396 741
Metro Media Services Pty Ltd	Australia	16 160 994 212
MMP (CGE) Pty Ltd	Australia	76 159 660 465
MMP (DVH) Pty Ltd	Australia	83 144 821 269
MMP (Melbourne Times) Pty Ltd	Australia	99 159 873 668
MMP Bayside Pty Ltd	Australia	66 159 319 847
MMP Community Network Pty Ltd	Australia	92 007 412 008
MMP Eastern Pty Ltd	Australia	97 159 661 364
MMP Greater Geelong Pty Ltd	Australia	90 159 938 806
MMP Holdings Pty Ltd	Australia	24 141 277 643
MMP Moonee Valley Pty Ltd	Australia	89 159 873 186
National Real Estate Media Pty Limited	Australia	56 602 439 574
National Real Estate Nominees Pty Limited	Australia	60 602 439 592
New South Wales Real Estate Media Pty Limited	Australia	12 602 713 913

Group member name	Country of incorporation	ABN
Northern Territory Real Estate Media Pty Limited	Australia	14 602 713 922
Property Data Solutions (2) Pty Ltd	Australia	41 650 393 516
Property Data Solutions Pty Ltd	Australia	50 110 242 129
Queensland Real Estate Media Pty Limited	Australia	39 602 734 716
Realbase Inc.	Philippines	–
Realbase Pty Ltd	Australia	92 645 511 422
Realhub Services Pty Ltd	Australia	80 119 877 333
Realhub Studios Pty Ltd	Australia	60 621 531 217
Realhub Systems Pty Ltd	Australia	48 608 435 990
Review Property Pty Ltd	Australia	52 159 320 519
South Australia Real Estate Media Pty Limited	Australia	45 601 949 491
Tasmania Real Estate Media Pty Ltd	Australia	41 602 734 725
Western Australia Real Estate Media Pty Limited	Australia	17 602 692 508
Workstream Technologies Pty Ltd	Australia	72 123 399 155