



This Modern Slavery and Human Trafficking Statement (Statement) is made by Lendi Group Pty Ltd and its controlled entities ('the Lendi Group', 'us', 'we', and 'our'). This Statement outlines the Lendi Group's approach to ensuring our business is conducted in a manner which minimises Modern Slavery risks in our operations and supply chain.

Objective and Scope

This Statement outlines the actions taken by us to identify and prevent slavery and human trafficking across our business and supply chains during the year ended 30 June 2022, and actions currently underway. The Statement is made by the Lendi Group pursuant to the *Modern Slavery Act 2018*.

Our Business

The Lendi Group incorporates the Australian-based businesses and brands of both Lendi and Aussie, each founded as market disruptors with a common purpose of helping Australians get access to better home loan deals, rates, and information. Lendi commenced operations in 2013 to empower borrowers with more transparency and choice while Aussie was founded in 1992 to bring competition to the Australian home lending industry. In 2021, Lendi and Aussie merged to create the Lendi Group and to usher in a new era of seamless connection between customers, lenders, brokers and data.

Driven by its mission to "*Change the way Australians experience property lending, for good*", the Lendi Group is home to Australia's number one home loan platform, a network of over 1,200 brokers, a head office team of over 1,000 people, a loan book of over \$87 billion and a retail footprint of more than 225 stores across Australia. While the Lendi Group only offers services to customers in Australia, we employ team members in Australia and in the Philippines and we procure services from a range of suppliers in Australia and abroad.

The Lendi Group takes the risks of Modern Slavery seriously and we believe in conducting business in a responsible manner. We recognise our responsibility to respect human rights, which we see as fundamental to us making a meaningful contribution to the communities in which we operate and to the supply chains that we utilise. We expect a high standard of human rights performance across our operations and supply chain, including as a provider of services and as an employer and procurer. All Lendi Group directors, employees and contractors are responsible for following relevant policies and acting in an ethical, responsible and lawful manner. This responsibility includes the reporting of any breaches of law or policy or instances where they believe actions would not meet the expectation of regulators, team members, the community and, importantly, our customers.

Our directors and executives are responsible for creating and promoting an environment in which compliance and ethical business practices are expected. Having the right environment and procedures in place around how we do business mitigates the risks of Modern Slavery and promotes human rights. In this Statement, we refer to Modern Slavery as defined in the Modern Slavery Act 2018 and understand this may occur in many forms including human trafficking, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.



Our Modern Slavery Risks

The way we do business at the Lendi Group mitigates the risk of Modern Slavery being present in our business operations. Accordingly, we have tailored our risk processes to ensure that we are focusing our efforts on those areas of highest risk. Based on our Modern Slavery risk assessment, we consider the risk of Modern Slavery to be low for the Lendi Group due to the nature and geographic locations of our people, operations and supply chain. Our risk assessment has identified the following more notable risks.

1. Supply Chains

Our supply chains consist of a range of suppliers for goods and services predominantly:

- Advertising and media
- IT hardware and communications
- Cloud and software services
- Insurance
- Professional services – legal, audit and recruitment
- Building services and office equipment
- Catering and hospitality
- Travel
- Mail and logistics.

We seek to engage with suppliers that have similar values and business ethics to us to minimise risk and we are incorporating Modern Slavery in our contracts with our suppliers to support the potential vulnerability of these suppliers' stakeholders to the risks of Modern Slavery. We carry out relevant due diligence of suppliers to assist in ensuring we engage with moral and ethical businesses.

At the Lendi Group we seek to:

- engage with reputable organisations for products or services;
- undertake due diligence, governance, and appropriate levels of assurance over new and renewed supplier arrangements;
- regularly monitor suppliers and their performance;
- ensure appropriate controls are in place including contractual conditions in relation to Modern Slavery for new supplier contracts.

We procure a range of goods and services from a diverse supply chain. Our supplier arrangements range from one-off purchases with non-contracted suppliers through to multi-year, larger value strategic partnerships. We work mainly with suppliers based in Australia; however, some suppliers are based overseas. Where suppliers are located overseas, we have now included consideration of the Global Slavery Index in our assessment tool to help ensure we only engage with ethical organisations. At the date of this Statement, this tool is applied when we engage with new suppliers and when we renew contracts with existing suppliers.



2. Our Employees and Contractors

The majority of our employees and contractors are skilled individuals based in Australia. They do not hold roles that are high risk or vulnerable to slavery or human trafficking. We also have employees in the Philippines. We have policies and processes in place to ensure that our employees in the Philippines are provided with a fair and equitable working environment. Our employees in the Philippines are all on permanent employee contracts and receive remuneration in excess of the local minimum wages.

3. Procurement of Branded Promotional Material

While our overall assessment of procurement of goods results in a low Modern Slavery risk, we recognise a marginally higher risk in the purchase of branded promotional material, including clothing and goods. The steps taken in relation to this are addressed in this Statement.

Steps Taken and Resources to Address Modern Slavery Risks

At the Lendi Group we believe it is important to understand that low spend does not always equate to low risk. It is the business owner's responsibility to understand the potential risks of any activities or transaction to ensure that these risks are effectively managed and to comply with Lendi Group policies and external regulations. We expect everyone at the Lendi Group to conduct themselves in line with our strong values that promote always doing the right thing.

Governance:

The Lendi Group has senior leaders who are responsible for team member well-being, risk, and regulatory/legal compliance. Those leaders report to the Chief Executive Officer who, in turn, reports to the Lendi Group Board and Board Audit and Risk Committee.

Policies:

Our commitment to human rights is supported by our policies, including:

- Broker Governance Policy (incorporating a Code of Conduct)
- Supplier Governance Framework
- Whistleblower Policies.

Suppliers:

At the date of this Statement, as part of the Risk, Compliance and Legal function, the Lendi Group has a team responsible for implementing and maintaining a supplier governance framework to identify and manage risk within the supply chain, as part of the onboarding and contract renewal processes.

The Lendi Group reviews its supplier risk assessment (performed on new suppliers and as contracts are renewed) to assess the Modern Slavery risks associated with the supplier, including the supplier's ethical standing and suitability. Should a matter be identified, this will be assessed and, where required, appropriate mitigation strategies will be documented and monitored. Should the matters identified not be able to be appropriately mitigated, suitable alternative suppliers will be identified.

Due diligence is performed when considering new suppliers, or when renewing existing supplier arrangements. Our due diligence process includes financial, security and reputation reviews of potential



suppliers and business partners, including assessment of the risk associated with geographical location. For example, we consider:

- Any known unethical practices identified during the supplier selection and engagement process;
- Existence of media articles that may indicate unethical supplier practices; and
- The supplier's reputation in the community.

Modern Slavery clauses, including a requirement to be in full compliance with all laws, rules and regulations applicable to suppliers are now included in new supplier contracts. We also establish an expectation with our suppliers that they engage with their suppliers on similar terms.

Conduct Expectations:

We maintain appropriate conduct expectations (for example in Lendi Group contracts and policies) and codes of conduct to reflect our values and to include an obligation for all at the Lendi Group to behave in a professional and respectful manner, in line with our values, policies and procedures.

Whistleblower Policies:

The Lendi Group's Whistleblower Policies recognises the ability for third parties, including suppliers and their employees, to provide a report and receive protections under the relevant legislation and to allow individuals to anonymously report or raise any concerns or suspected unethical or corrupt behaviour.

Reporting:

The Lendi Group is committed to investigating any reported concerns or incidents, and if substantiated, taking appropriate steps to address matters raised. All substantiated incidents of Modern Slavery will be formally investigated and reported to the Lendi Group Board Audit and Risk Committee, and to relevant regulatory bodies, if required.

Next Steps

The Lendi Group is committed to the highest ethical standards and will regularly review the effectiveness of our policies, procedures, and training to improve our ability to detect, mitigate and reduce the risk of Modern Slavery within our business. We have identified the following key actions that are currently underway:

1. Ongoing and continuous review of our supplier arrangements and procurement processes to ensure compliance with the Modern Slavery Act.
2. Inclusion of relevant supplier contract clauses as part of the supplier onboarding process.
3. Design and roll out of Modern Slavery training to relevant employees and contractors; and
4. Publishing this Statement on the Lendi Group website and making it available to other parties, as required.

This statement was approved by the Board of Directors of Lendi Group Pty Ltd on 17 November 2022.

Signed by:

David Hyman
Director, Lendi Group Pty Ltd
Chief Executive Officer, Lendi Group