

Think Tank Group Pty Limited Modern Slavery Statement

1. Identification of the Reporting Entity

This modern slavery statement is made on behalf of Think Tank Group Pty Ltd (“TTG”) (ABN 75 117 819 084) and its controlled entities. This statement identifies the actions TTG has taken to recognise, assess and address modern slavery risks across its operations and supply chains for the period 1 January 2025 to 31 December 2025 prepared in accordance with sections 14 and 16 of the Modern Slavery Act 2018 (the Act).

2. Introduction

At Think Tank Group Pty Ltd (“TTG”), we acknowledge our responsibility to identify and manage the risks of modern slavery within our operations and supply chains. As a regulated financial services provider with a national presence, TTG is committed to conducting business in a manner that is ethical, transparent, and fair. We strive to uphold human rights and prevent exploitation by embedding sustainable and responsible practices across our organisation.

TTG’s supply chain includes providers of information and communications technology, recruitment services, property and facilities management, and other professional services. While our direct supply chain is predominantly Australian-based and assessed as low risk, we recognise that indirect risks may arise through global sourcing of goods and services.

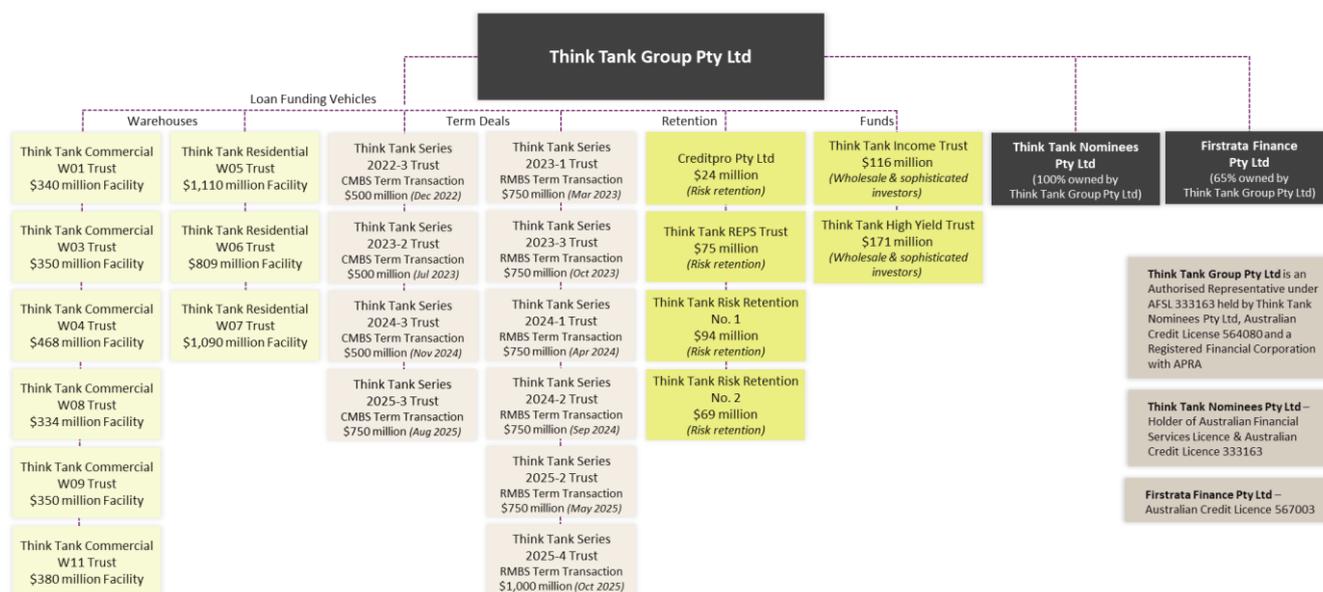
This statement outlines the actions TTG has taken during the reporting period to assess and address modern slavery risks across our business and controlled entities. It reflects our commitment to continuous improvement, stakeholder engagement, and compliance with the Commonwealth Modern Slavery Act 2018.

3. Structure, Operations, and Supply Chains

Structure

Think Tank Group Pty Ltd (“TTG”) is a sole operating entity within the Thinktank Group. TTG is a privately owned company, incorporated under the Corporations Act 2001, commencing business in July 2006 as a non-bank provider of commercial and residential property finance. with registered office in Sydney, NSW. TTG employs approximately 200 staff, with offices in Sydney, Melbourne, Brisbane and Perth, , and provides commercial and residential property finance to self-employed individuals and SMEs across Australia.

The Group’s structure includes several wholly owned subsidiaries and controlled entities, each with distinct roles:



Operations

- **Think Tank Nominees Pty Ltd (TTN):**

TTN holds an Australian Financial Services Licence (AFSL) and Australian Credit Licence (ACL) (No. 333163). TTN is 100% owned by TTG and serves as a licensing and compliance vehicle for the Group. TTN does not conduct independent operations or have employees; its primary function is to support TTG's regulated activities.

- **Loan Funding Vehicles:**

Think Tank Group (TTG) has established a comprehensive structure of loan funding vehicles to support the origination and securitisation of first mortgage commercial and residential property loans. These vehicles operate under a master trust arrangement and include:

- **Warehouses:** Short-term funding facilities that provide initial capital for loan origination prior to securitisation.
- **Term Deals:** Public and private securitisation transactions that refinance warehouse facilities and provide long-term funding. These include RMBS and CMBS transactions under the Think Tank Series program.
- **Retention Vehicles:** Entities such as Creditpro Pty Ltd and Think Tank Risk Retention trusts, which hold risk retention interests in securitisation transactions to meet regulatory requirements and align TTG's interests with investors.
- **Funds:** Investment trusts such as the Think Tank Income Trust and Think Tank High Yield Trust, which cater to wholesale and sophisticated investors seeking exposure to TTG's loan portfolio.

These trusts and entities exist solely to hold and manage loan assets and funding interests. **They do not have employees, physical operations, or independent procurement activities.**

- **Firstrata Finance Pty Ltd:**

Firstrata Finance Pty Ltd is a 65% owned subsidiary of TTG and holds its own Australian Credit Licence (ACL 567003). Unlike the loan funding vehicles, Firstrata is an operational lending business within the Group. It actively engages in loan origination and servicing activities, providing complementary lending solutions to TTG's core offerings. Firstrata has employees and conducts day-to-day operations to deliver credit products to its customers.

Supply Chain

TTG's supply chain is predominantly onshore, with the majority of direct suppliers located in Australia. Key supply categories include:

- Information, communications, and technology (ICT)
- Human resources and recruitment
- Property and facilities management
- Print, production, and logistics
- Marketing, events, travel, and hospitality

Indirect supply chain exposure may occur through procurement of goods and services (e.g., IT hardware, merchandise, etc) that may originate from overseas.

4. Risks of Modern Slavery Practices in Operations and Supply Chains

Think Tank Group Pty Ltd ("TTG") recognises that modern slavery risks may exist in any business, including financial services. Our FY25 risk assessment considered sector and product risks, geographic risks, and entity risks across our operations and supply chains.

TTG's direct supply chain is assessed as low risk due to its strong Australian focus and the nature of services procured—primarily information and communications technology (ICT), recruitment, property and facilities management, and professional services. However, we acknowledge that indirect risks may arise in upstream supply chains, particularly where goods and services (e.g. IT hardware, merchandise, promotional materials) are sourced globally and may involve complex supply networks.

Potential modern slavery risks in TTG's operations and supply chain include:

- **Suppliers:** TTG may be indirectly linked to modern slavery if any of our suppliers or their subcontractors engage in exploitative practices. This includes risks associated with overseas manufacturing, outsourced service delivery, and labour-intensive industries.
- **Business Operations:**
 - There is a risk that TTG's financial products could be misused by individuals or entities connected to modern slavery, such as through property transactions or business financing.
 - Charitable donations, sponsorships, or third-party partnerships may inadvertently support organisations with links to modern slavery if not properly vetted.

TTG does not make any claims regarding the complete absence of modern slavery within its operations or supply chains, and remains dedicated to ongoing vigilance, due diligence, and continuous improvement. We acknowledge that modern slavery risks are constantly evolving and require proactive management, particularly as our business and supplier relationships develop.

5. Actions taken to Assess and Address Risks of Modern Slavery

TTG has adopted a proactive and structured approach to identifying, assessing, and mitigating modern slavery risks across its operations and supply chains. During FY25, we continued to strengthen our governance framework, enhance supplier engagement, and embed modern slavery awareness throughout the organisation. Our actions are informed by ongoing risk assessments, regulatory guidance, and stakeholder expectations. The residual risk of modern slavery within TTG's operations and supply chain remains assessed as low, based on the nature of our procurement activities and the geographic location of our suppliers.

The following key actions were undertaken during the reporting period:

Supplier Due Diligence

TTG conducted a comprehensive due diligence process on both new and existing suppliers to formally assess their exposure to modern slavery risks.

- All suppliers were required to complete a modern slavery questionnaire, which included questions on governance, sourcing practices, subcontractor management, and grievance mechanisms.
- Responses were reviewed by the compliance team to identify any red flags or gaps in supplier controls.
- Where concerns were identified, TTG engaged directly with suppliers to seek clarification and, where necessary, request improvements or additional documentation.
- Supplier contracts were reviewed to ensure inclusion of anti-modern slavery clauses and expectations for ethical conduct.

Policy Framework

TTG maintains a suite of policies that support the identification and mitigation of modern slavery risks. These policies are reviewed annually and updated as needed to reflect evolving risks and regulatory expectations.

- **Risk Management Policy:** Integrates modern slavery risk into TTG's enterprise risk framework.
- **Code of Professional Conduct:** Sets expectations for ethical behaviour across all staff and contractors.
- **Supplier Policy:** Outlines TTG's requirements for supplier conduct, including compliance with human rights standards.
- **Diversity, Equity & Inclusion Program:** Promotes inclusive practices and safeguards against discrimination and exploitation.
- **Whistleblower Protection Policy:** Provides a confidential mechanism for reporting concerns, including modern slavery.
- **AML & CTF Program:** Includes controls to detect and prevent financial transactions linked to criminal exploitation.

Training and Awareness

TTG continued to invest in staff education to ensure a shared understanding of modern slavery risks and responsibilities.

- All employees were required to complete a modern slavery training module, which covered the definition of modern slavery, risk indicators, reporting obligations, and TTG's internal procedures.
- Training completion was tracked to ensure 100% participation.
- Additional resources and updates were shared via internal communications to reinforce awareness and encourage vigilance.

Monitoring and Remediation

TTG maintains mechanisms to monitor for potential modern slavery concerns and respond appropriately.

- The whistleblower channel was actively monitored for disclosures relating to modern slavery or unethical conduct.
- No complaints or grievances related to modern slavery were received during FY25.
- In the absence of identified issues, no remedial actions were required; however, TTG remains prepared to act swiftly should any concerns arise.

7. Assessing Our Effectiveness

Thinktank's focus over the reporting period has been to promote organisation wide awareness of our approach to recognise, assess and address modern slavery risks across our operations and supply chains. Thinktank acknowledges that measuring effectiveness is critical to assist in informing appropriate actions to address risks. The activities used to assess the effectiveness of actions include:

- Ongoing monitoring of supply chain risks
- Monitoring regulatory changes to stay updated with modern slavery laws and regulations.
- Supplier Due Diligence Questionnaire and evaluation of responses to identify potential modern slavery issues.
- Requiring one hundred percent employee participation in modern slavery training modules.

8. Consultation with Entities Owned or Controlled

TTG undertook a formal consultation process in preparing this statement. As the primary operating entity, TTG reviewed the roles and functions of all subsidiaries and trusts to confirm that they are non-operating vehicles, with no staff, procurement, or independent supply chains. These entities exist solely to hold and manage loan assets or funding interests under TTG's direction.

The only exception is Firstrata Finance Pty Ltd, which is an operational lending business within the Group. Firstrata holds its own Australian Credit Licence and conducts origination and servicing activities with its own staff and systems. TTG consulted with Firstrata to ensure its operations are aligned with Group policies and compliance requirements.

The Board of TTG confirmed that all policies and compliance activities are implemented by TTG and apply across the Group. Should any other subsidiary or trust commence operational activities in the future, TTG will implement a more detailed consultation process as required by law.

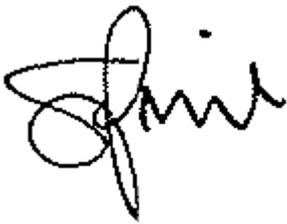
9. Future Commitments

Over the next review period Thinktank will focus on:

- Strengthening supply chain contracts and anti-modern slavery clauses;
- Expanding employee training and awareness;
- Publish the Modern Slavery Statement on the Thinktank website;
- Development of relevant policies and procedures; and
- Monitor relevant government and industry guidance on the assessment of modern slavery risks.

10. Details of approval given by relevant governing body

This statement was approved by the Board of Directors of Think Tank Group Pty Ltd in their capacity of principle governing body of Think Tank Group Pty Ltd in November 2025.



Simon Price, Chair



Jonathan Street, CEO