

HUMM GROUP LIMITED

MODERN SLAVERY STATEMENT 2022

DECEMBER // 2022

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hummm Group Limited
ABN 75 122 574 583

STATEMENT FROM THE CHAIRMAN AND CEO.

hummgroupprovides easy instalment plans which enable businesses and consumers to make bigger purchases. hummgroupprovides facilitates purchases for almost 2.6 million customers and operates in Australia, New Zealand, Ireland, Canada and the United Kingdom.

This Joint **Modern Slavery Statement (Statement)** has been prepared in accordance with the *Modern Slavery Act 2018 (Cth)* and the *Modern Slavery Act 2015 (UK)* (the **Act**). The Statement describes the actions taken by **hummgroupprovides** and its relevant subsidiaries to address modern slavery and human trafficking risks in its operations and supply chains for the financial year ending 30 June 2022.

This Statement has been prepared by **hummm** Group Limited ACN 122 574 583 (ASX: HUM) (“**hummgroupprovides** or the Group”) on behalf of **hummgroupprovides** and its subsidiaries, including **flexicommercial** Pty Limited ACN 644 644 860 and FlexiRent Capital Pty Ltd ACN 064 046 046, being the relevant reporting entities under the Act and Humm Group Limited (NI 675430).

hummgroupprovides understands the important role that it can play in respecting and promoting human rights and eradicating modern slavery. Our **Code of Conduct** outlines our expectations of our employees and those with whom we conduct business. We have onboarding and vetting processes in place for both employees and suppliers. In addition, our **Whistleblower Protection Policy** ensures that employees and anyone who works with us can speak freely about any concerns they have, including those related to our external partnerships, without fear of reprisal.

This Statement has been approved by the Board of **hummgroupprovides** as the parent entity of the Group, including **flexicommercial** Pty Limited ACN 644 644 860, FlexiRent Capital Pty Ltd ACN 064 046 046 and Humm Group Limited (NI 675430), on 22 June 2023.



Andrew Abercrombie
hummgroupprovides Chairman



Rebecca James
hummgroupprovides CEO

1. In respect to the process of consultation between the reporting entities, the sole director of **flexicommercial** Pty Limited and FlexiRent Capital Pty Ltd is the Chief Financial Officer of **hummgroupprovides** who has contributed to and reviewed this Statement.

STRUCTURE, OPERATIONS AND SUPPLY CHAIN.

ABOUT US

hummgroup is a diversified financial services company that provides easy instalment plans which enable businesses and consumers to make bigger purchases. **hummg**roup facilitates purchases for almost 2.6 million customers and operates in Australia, New Zealand, Ireland, Canada and the United Kingdom.

Our principal activities include the provision of:

- >> Commercial Lending in Australia and New Zealand;
- >> Point of Sale Payment Plans;
- >> Australia Cards (**hummg**®90, Lombard and Once); and
- >> New Zealand Cards (including Farmers Finance Card, Farmers Mastercard®, Q Card, Q Mastercard® and Flight Centre Mastercard®).

We employ more than 500 people across five countries and their wellbeing remains a primary concern. We also believe that courtesy should be extended to the employees of our suppliers.

WHERE WE OPERATE

hummgroup operates in Australia, Canada, Ireland, New Zealand and the United Kingdom, with our head office in Sydney. During the year we had offices in Adelaide, Melbourne, Auckland, Dublin, Belfast and, most recently, Toronto. We have senior management in place within every location.

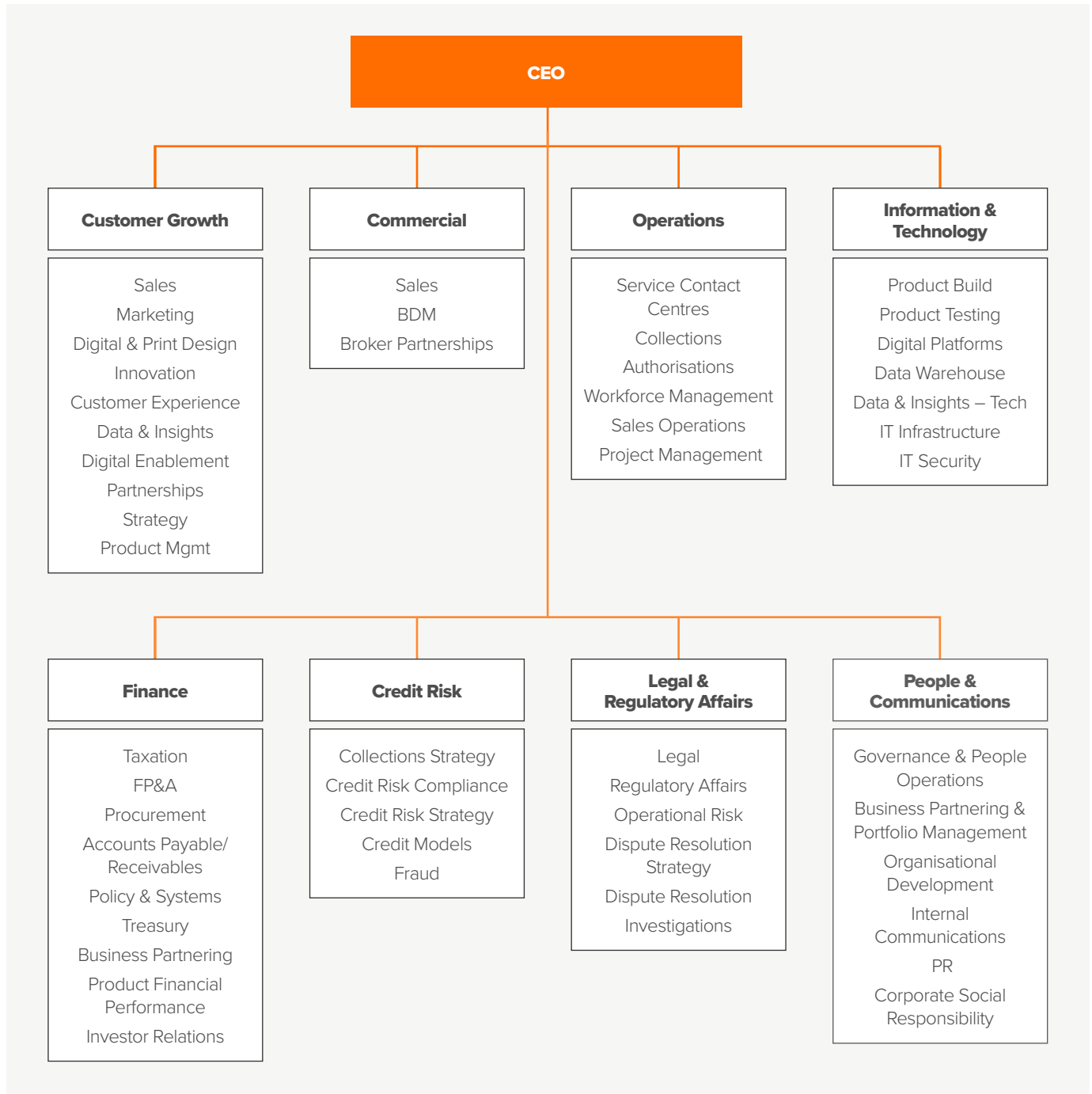
In addition, we contract call centre services from an Australian-based company with operations in Manila. This call centre team is carefully managed by a full-time **hummg**roup employee on-location, under the oversight of a member of the Executive team.

HOW WE OPERATE

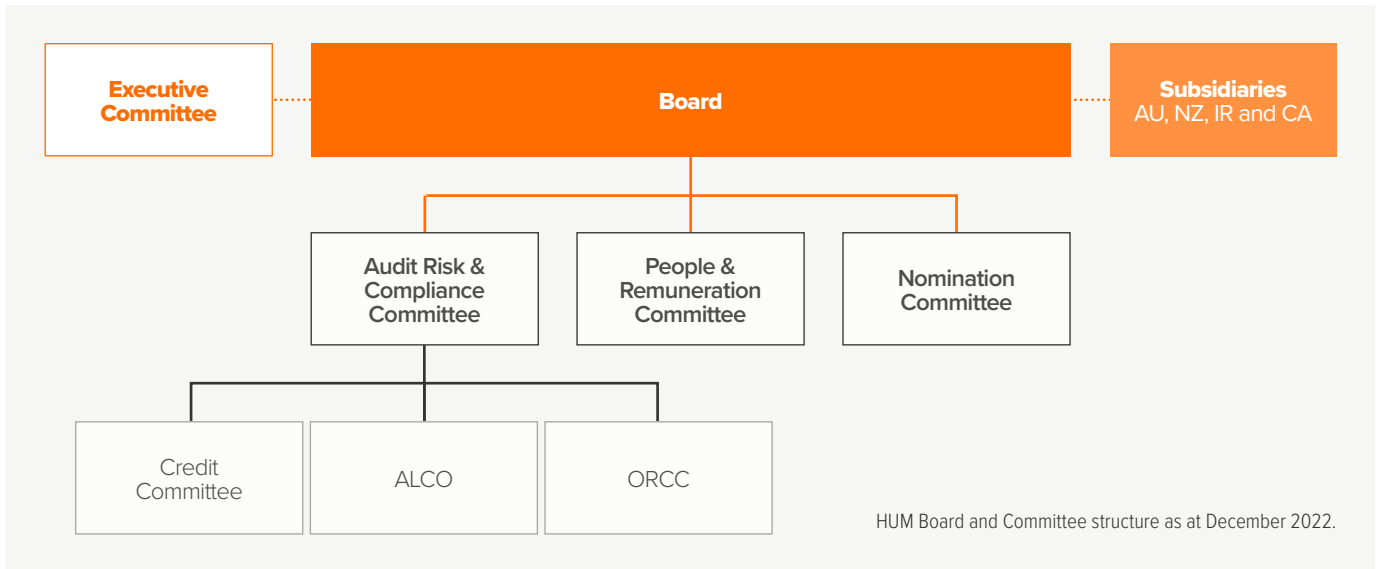
hummgroup products and services are predominantly designed, built, developed and delivered by employees of **hummg**roup who work within our offices, supported by world class partners where specific expertise is required.

The risks of using an outsourced provider for call centre services have been carefully assessed and managed over the long history we have had with our provider, and **hummg**roup believes that this thorough and careful management has eliminated the risk of modern slavery and ensured the wellbeing of all Manila-based contact centre staff is maintained. This has been a particular focus during the challenges experienced (and ongoing) as a result of the COVID-19 pandemic.

OPERATIONAL STRUCTURE



HUMMGROUP GOVERNANCE STRUCTURE



OUR MODERN SLAVERY RISK AREAS.

Modern slavery includes 8 types of serious exploitation: trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and child labour. hummgroup's major categories of procurement include professional services, IT and digital technology, business operations, marketing and human resources. We have identified the following areas of risk of modern slavery practices in our operations and supply chains:

- 01 Contingent workforce and managed services:** while hummgroup has contracts with a number of highly skilled specialists to provide professional and consultancy services, these are almost exclusively based in the jurisdictions in which we operate.
- 02 Overseas operations:** except as noted below, hummgroup does not currently operate in any high-risk locations, and has senior management in place within all operating locations.
- 03 Facilities management:** hummgroup procures various categories of services including cleaning, mechanical, electrical, information technology, hygiene specialists, caterers, and maintenance services. The workers within these supply chains can be from vulnerable populations, including migrant workers and workers from low socioeconomic backgrounds. This escalates the risk of modern slavery when it is not managed carefully. hummgroup chooses its suppliers in these areas after undertaking appropriate due diligence.

As a fintech hummgroup has a third-party supply chain which is relatively simple in support of our provision of digital lending products and services.

We have not identified any specific instances of modern slavery within our operations or supply chain, and believe that the risks of modern slavery existing in our operations are low. hummgroup uses predominantly Australian, United States, United Kingdom and New Zealand based suppliers, which are governed by strong labour and modern slavery protections, and mainly provide professional services (such as legal, financial, data analytics, data security and other IT services) and employ qualified personnel.

Additionally, our suppliers which are headquartered or based offshore provide products or services which are largely office-based or professional activities and not in high risk modern slavery categories.

None of our suppliers are based in any of the 10 countries whose governments have been reported in the **2018 Global Slavery Index** as taking the least action to respond to modern slavery, except for a supplier which has existing operations in, amongst other countries, Philippines. This supplier provides call centre services from Manila and hummgroup is comfortable that based on the public disclosure of its modern slavery practices by way of lodgement of a **Modern Slavery Statement** for the FY22 period that it has taken appropriate action to ensure modern slavery does not take place and is prevented within its business or supply chains.

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS.

hummgroup continues to develop its Group **Modern Slavery Policy** and its education program, with a focus on our team members with procurement and engagement responsibilities. The intent of the modern slavery training is for the participants to gain an understanding of the following:

- >> Overview of the *Modern Slavery Act 2018*.
- >> What modern slavery is or could be, and how to identify where the different types of modern slavery could occur.
- >> **hummg**roup's approach to modern slavery, and modern slavery risk management.
- >> Implementing and supporting the **hummg**roup risk management process.
- >> Reporting of actual or potential occurrences of modern slavery.
- >> Modern slavery statement reporting.

hummgroup continues to monitor and assess the risk of modern slavery in the Group's existing and new operations with appropriate due diligence and adherence with the Group's **Modern Slavery Policy**. This will be done by including, where possible, modern slavery clauses in supplier contracts and requests for confirmation of modern slavery compliance and practices at onboarding and periodically.

It is expected that our suppliers will always act in a way that is consistent with our approach to modern slavery compliance and will also adopt policies and/or processes which support the identification and eradication of modern slavery risks in their operations and supply chains.

Where **hummg**roup identifies any non-compliance with its modern slavery stance it will endeavour to work with the supplier to take corrective and remediation action. Where this cannot be achieved, **hummg**roup may suspend or terminate the relationship with that supplier.

MEASURING EFFECTIVENESS.

hummgroupp continues to review and monitor the effectiveness of its risk assessment and management processes to address the modern slavery risks in its business and supply chain. We assess the effectiveness of our actions in identifying and managing modern slavery risks by continual review of and compliance with our Group **Modern Slavery Policy**, education of hummgroupp employees in respect of modern slavery and enforcing a process to monitor the risk of modern slavery in our supply chains.

hummgroupp will, where it has identified a risk of modern slavery, work with our suppliers on implementing corrective actions.

hummgroupp acknowledges that, as this is an ongoing journey which requires effort and focus across periods, we must continue to refine our approach and influence change with the suppliers with whom we operate.

CONCLUSION.

hummgroupp understands the importance of eliminating modern slavery and the role that the Group can play in eliminating this unacceptable practice from our operations and supply chains. hummgroupp recognises that this is a continuing journey requiring ongoing diligence and attention. hummgroupp will continue to enhance and embed the modern slavery risk management strategy to further reduce the Group's exposure to modern slavery risks, as well as working with suppliers to help eliminate modern slavery in their supply chains.

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