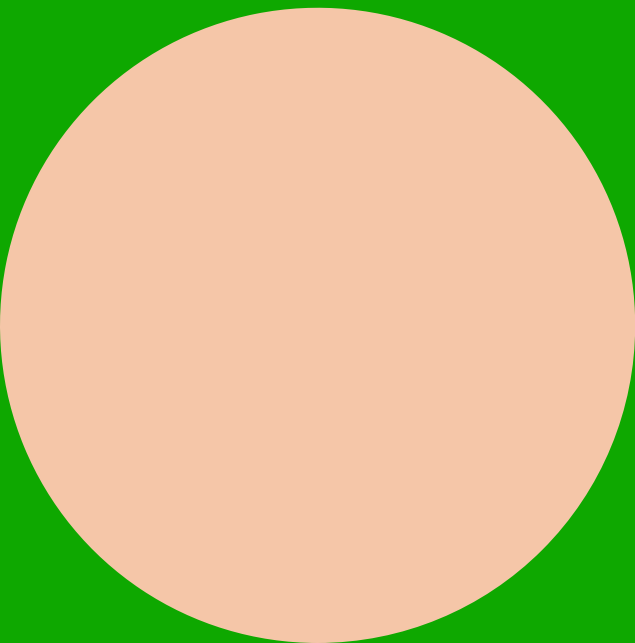


Domain

Modern Slavery Statement 2021

Domain Holdings Australia Limited
ABN 43 094 154 364



Domain Group Modern Slavery Statement 2021

This modern slavery statement (**Statement**) is made by Domain Holdings Australia Limited (**Domain**) and covers Domain and its subsidiaries as at 30 June 2021 (**Domain Group**).

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

This Statement covers the reporting period from 1 July 2020 to 30 June 2021 (**Reporting Period**).

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.

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 chain.

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 \$294.2 million.

Domain's largest shareholder is Nine Entertainment Co. Holdings Limited (ASX:NEC), with a 59.04% shareholding.

The other members of the Domain Group are Domain's subsidiaries (within the meaning of the *Corporations Act*). A list of Domain Group's subsidiaries as at 30 June 2021 can be found in Domain's financial statements in its Annual Report for the Reporting Period available at Domain's Shareholder Centre website at shareholders.domain.com.au.

As at the date of this Statement, Domain Group has approximately 750 employees who are ordinarily based in Australia. Prior to the COVID-19 pandemic, all of Domain's employees were based in Australia. Some of Domain Group's employees are currently working remotely from overseas on a temporary basis due to travel restrictions or family circumstances relating to the COVID-19 pandemic. However, the substantial majority of Domain Group's employees are still working in Australia.

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.

All subsidiary members of the Domain Group are subject to the same policies as Domain and have Domain-nominated Directors on the Board. They utilise the same centralised Domain supplier procurement and finance teams for onboarding any material suppliers and use the same centralised Domain people employee experience team. 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. Accordingly, Domain considers that it has undertaken an effective consultation process and has effective oversight of the activities, people and supply chains of the whole of the Domain Group.

Operations of the Domain Group

Domain encompasses a portfolio of brands that support it to be a leading property marketplace in Australia for consumers, agents and organisations with an interest in the Australian property market.

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

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

As a customer-centric property marketplace, Domain is committed to making the property journey easier, more enjoyable and more connected at every stage; this is all part of the Domain Group's solutions working 'better together'. Domain leverages its unique data, products and technology to deliver solutions to its customers that are found only on Domain.

Headquartered in Sydney, the Domain Group is driven by a group of passionate people based all across the country with offices in Melbourne, Canberra, Brisbane, Perth and Adelaide. 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 live those environments.

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: legal, accounting, recruitment
- 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.

The Domain Group's Commitment to Human Rights

Domain 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.

Domain expects high standards of human rights performance across the Domain Group's operations and supply chain. 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 reduce negative impacts and to enhance positive ones.

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

Domain considers that Domain Group's risks of modern slavery practices are low due to the nature and geographic location of its people, operations and supply chain:

People: Domain's employees are for the most part skilled professionals working in Australia. They do not hold roles or positions that are at high risk or vulnerable to slavery or human trafficking.

Operations: The Domain Group's products are principally online and are primarily developed within Australia with only a small amount of the technology and product work undertaken overseas through an outsourced labour hire supplier.

Supply chain: The Domain Group sources third party goods and services from reputable suppliers located primarily in low risk countries. The nature of the goods and services that it procures are not typically the type that are at risk of slavery and human trafficking.

Risk areas: Although Domain considers its overall modern slavery risk to be low, it recognises that its risks are heightened marginally in two areas: (1) Domain's use of outsourcing of some services particularly where the labour hire is from higher risk countries and (2) the purchase of branded employee clothing and goods. The steps taken in respect of these two recognised higher risk areas are addressed in this Statement.

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

Modern Slavery Governance, Policies, Working Groups and Systems

Governance: 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.

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 the supply chain including:

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

The first of these three policies are applicable to all Domain Directors, employees, contractors and others.

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.

Copies of these policies are available at Domain's Shareholder Centre website at shareholders.domain.com.au.

Working Groups: 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 Employee Experience team has an internal team that is responsible for ensuring that Domain follows appropriate hiring practises and that Domain employees' working conditions are safe and fair.

Systems and processes: Each of the working groups described above uses systems and processes to ensure that relevant information is collected and stored appropriately and can be reviewed and verified, if required.

Supplier Assessment Process

In early 2020, Domain, including its subsidiaries, undertook a review of material suppliers in the Domain Group's supply chain, continuing an annual process established in 2019 and reported on in Domain's first Modern Slavery statement. As per the review undertaken in 2019, this included material suppliers of both Domain and the other members of the Domain Group. Materiality was measured by value of expenditure and covered 40 suppliers that collectively represented approximately 80% of the procurement expense of the Domain Group.

Expanding on the scope of the review undertaken in 2019, an additional set of international suppliers registered in geographical locations which put them in relatively higher categories of risk than most Domain Group suppliers were also reviewed.

Domain undertook the above risk assessment based on certain criteria including:

- 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
- Whether the supplier had agreed to the supplier Code of Conduct
- Other readily available public information and information provided by the Supplier

As a result, Domain was able to identify suppliers to the Domain Group that were considered 'no risk' or 'low' risk. The risk assessment also identified suppliers that fell into potentially higher categories of risk and deeper assessment was then conducted in respect of those suppliers.

For international suppliers, whose geographical location put them in a relatively higher category of risk than most suppliers to the Domain Group, further assessments were undertaken.

Assessment of Outsourced Labour Services

Domain recognises that its modern slavery risk is heightened by its use of outsourced labour services to countries that have a higher risk rating than Australia. The increased risk may arise from 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 reference checking the supplier's reputation, having the supplier complete a questionnaire that focuses on human rights and safe working environments, checking if the supplier has relevant company policies in place, visiting the overseas site or having the supplier provide photographs of working environments.

Assessment of Specific Higher Risk Goods

During the Reporting Period, where Domain has been considering acquiring goods that may fall into higher risk categories, for example employee branded clothing (T-shirts, sweatshirts, hats etc), or branded merchandise (water bottles, coffee cups, stickers etc), Domain has a working group that reports to the Group Director, Employee Experience and Sustainability that assesses potential suppliers. They take into account a number of factors including the country of origin and whether the supplier is a reputable supplier as well as the quality of the materials and the environmental impact of the goods. These are initial checks that are undertaken before the supplier would proceed to the centralised supplier assessment process undertaken by the Finance function.

Employee Experience Processes

During the Reporting Period, Domain's Employee Experience team have exercised systems and processes that are in place 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 in Australia and are paid a reasonable wage for the work that they do.

Supplier Code of Conduct

The Supplier Code of Conduct sets out minimum standards that the Domain Group expects of suppliers.

During the Reporting Period, Domain continued to send the Supplier Code of Conduct by email to all existing 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 encouraged to contact Domain if they had any concerns or were unable to comply with the Supplier Code of Conduct for any reason.

During the Reporting Period, Domain updated its onboarding process for new suppliers by automating the delivery of the Supplier Code to new suppliers through Domain's self-serve Vendor Portal. As part of the onboarding process, new suppliers are asked to identify whether they are unable to comply with the Supplier Code Of Conduct, which triggers a manual review process of the relevant supplier. This process was established prior to and was maintained during the Reporting Period.

Assessment of Effectiveness of Actions

The Domain Group assesses the effectiveness of its actions in identifying and managing modern slavery risks by tracking its actions and the outcomes of those actions, undertaking regular spot checking and through internal governance.

During the Reporting Period, the Domain Group has reviewed its processes and made changes to make them more effective. An example is changes made to the Domain Group's supplier onboarding process. Those changes will continue to be assessed to ensure that they are working as anticipated, and with a further aim of continually improving the Domain Group's processes.

FY22 Process Enhancements

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

Over the course of the coming reporting period (the period from 1 July 2021 to 30 June 2022), Domain Group will continue to review its supplier arrangements and procurement processes to ensure continued compliance with the Modern Slavery Act.

As part of implementing a new finance system later in the next Reporting Period, Domain will implement a new supplier onboarding process which will include the following:

- A new portal for supplier onboarding requiring a positive confirmation that the supplier agrees to Supplier Code of Conduct. Any non-complying suppliers will be required to contact Domain's Purchasing Team.
- A statement will be added to payment purchase order correspondence sent to suppliers which reminds them of the need to comply with the Supplier Code of Conduct, a link of which will be included in this statement.

Ongoing Monitoring and Auditing

Domain Group is committed to maintaining an ongoing dialogue with its suppliers on modern slavery. Domain is undertaking bi-annual monitoring and spot-check assessments of existing suppliers to Domain Group, as well as undertaking risk assessments of new material suppliers that are on-boarded into Domain Group's supply chain.

Approval of this Statement by Principal Governing Body of Reporting Entity

This Statement has been approved by the Domain Board of Directors.

A handwritten signature in black ink, appearing to read 'JP', with a long horizontal stroke extending to the right.

Jason Pellegrino
CEO and Managing Director
17 August 2021