

FINDEX

Modern Slavery Statement

2020-2021 Australian
Financial Year

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Modern Slavery Statement

Statement

This Modern Slavery Statement, made by Findex (Aust) Pty Ltd (Findex), is the second statement to be made in compliance with the *Modern Slavery Act 2018 (Cth)* (the "Act") and has been prepared in respect to the financial year ending 30 June 2021. Findex acknowledges responsibility under the Act and will ensure transparency in respect to the organisation and its suppliers of goods and services.

As a good corporate citizen, Findex is dedicated to operating in an ethical and law-abiding manner and expects our suppliers to share these values. We seek to minimise the risk of modern slavery occurring in our operations and supply chains.

The purpose of this statement is to outline Findex's approach to ensuring our business and supply chains are conducted within a framework that mitigates modern slavery risk.

As outlined in the FY20 Modern Slavery statement, Findex had committed to continuous improvement and undertaking proactive steps to ensure that modern slavery does not occur in our own business and supply chains, particularly within our internal risk and procurement functions.

During FY2021, the following key actions have been adopted:

- Implemented Findex's first Modern Slavery Policy, providing guidance in reference to the following:
 - Findex's supplier risk assessment processes for the purposes of identifying and assessing modern slavery risks in our current operations and supply chains, and prospective suppliers.
 - Processes to monitor suppliers who may pose a higher modern slavery risk and mitigate those associated risks.
 - Incorporation of modern slavery compliance requirements into procurement contractual processes.
 - A definition of the metrics Findex uses to assess effectiveness in combatting modern slavery risk in our operations and supply chains.
 - An agreed procedure for responding to modern slavery cases.

- Risk screening on existing suppliers, including assessing existing suppliers and future suppliers to differentiate between low, medium and high-risk categories of procurement relating to modern slavery compliance. Distributed a Findex modern slavery questionnaire to suppliers who pose a higher risk of modern slavery.
- Organisational-wide awareness and stakeholder engagement on the modern slavery compliance requirements, including the delivery of awareness training on modern slavery to Findex staff. A Modern Slavery e-Learning module has been added onto the Findex IQ platform (Findex's e-Learning platform).

The Board of Directors have validated this statement and the approach to be compliant with the Act.













Our structure and operations

Findex (Aust) Pty Ltd ABN 84 006 466 351 is a subsidiary of Findex Group Limited ABN 40 128 588 714. As one of the largest privately-owned providers of integrated financial advisory and accounting services in Australia and New Zealand, Findex has close to 3,000 staff, geographically dispersed throughout 100 offices. With \$17bn under advice, our team has more than 30 years' experience delivering business advisory, wealth management, audit, performance consulting, accounting and tax services. Findex is the fifth largest accounting firm in Australia and 95% of our Partnership group across Australia and New Zealand are equity holders in our business.

Findex exists to enrich the lives of the people, businesses and communities we work with through smart solutions, a one best way approach and an integrated delivery method via our Family Office model (Diagram 1). Findex understands the importance of a holistic service offering that enables its clients to meet their goals, needs and expectations.

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This approach encompasses:

-  Wealth Management
-  Specialist Services, including Specialist Tax
-  Self-Managed Super Fund
-  Business Advisory
-  Lending
-  Corporate Finance
-  Tax Advisory
-  Audit and Assurance
-  Accounting
-  Corporate Benefits
-  Risk Insurance and General Insurance
-  Risk and Management Consulting

Findex Group Ltd is governed by a Board. The Board has ultimate responsibility for the Group's internal quality control and risk management.

The responsibility for managing the day-to-day operations of the Group is held within the Management Team. This includes responsibility for developing, implementing and monitoring quality control and risk-related matters. The management team comprises Senior Management and regional Executive Managing Partners.

During the reporting period this statement covers, the Risk Management Team has actively engaged and consulted with the Management Team, and updated the Board with progress as we continue to mature our approach to modern slavery processes and deliver upon our key focus areas outlined in our FY20 statement.

During the current reporting period, the Management Team has signed-off and approved the Findex Modern Slavery Policy which includes details of the Act's 2018 reporting requirements; information regarding the actions we intend to take to address these requirements. The policy applies to all Findex Senior Executives, Directors, employees, secondees, consultants and contractors ("employees") in all businesses and subsidiaries (including offshore locations), within Findex. The Management Team have over-sight of all entities which Findex Group Limited owns.

Supply chains

Findex's supply chains consist of goods and services which support our corporate operational departments and client facing services lines. Findex largely operates in a sector that is generally considered a low risk for modern slavery, however, we recognise we can be indirectly exposed to modern slavery risks through our supply chains.

The majority of goods and services Findex procures are acquired from locally based suppliers in our operating countries of Australia and New Zealand. Excluding remuneration, our major categories of procurement include:

- Rent and Infrastructure (facilities management: cleaning, parking, energy, etc.).
- IT and Communications (including software).
- Professional Fees (consultancy, audit fees, etc.).
- Travel and Entertainment.
- Marketing and Merchandising.
- General Office Costs (postage, stationery, etc.).
- Human Resources (professional development, recruitment, staff welfare, etc.).

Findex's internal Procurement and Risk Management teams completed a risk screening on existing suppliers as part our documented process to monitor suppliers who may pose a higher modern slavery risk. These suppliers included facility service providers (e.g. cleaning and premises maintenance), technology hardware providers, Findex merchandise and uniform suppliers, and off-shore outsourcing suppliers. To mitigate any associated risks, these suppliers have been sent a modern slavery questionnaire, with the intention of validating that the supplier is adequately addressing modern slavery risks or if additional action is required. No adverse responses have been provided to date and we will continue to review the responses and work with the suppliers to ensure our compliance.

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Findex has several policies in place which guide our staff and promote a culture of compliance, honesty, and ethical behaviour. The most relevant policies and procedures we have in place, which mitigate against the risk of modern slavery, include:

- Code of Conduct.
- Whistle-blower Policy.
- Fraud and Corruption Policy.
- Expense Authorisation and Payment Policy.

In addition, our procurement strategic plan for 2021 includes the development of a Procurement Policy to formally document the established procurement processes currently undertaken when onboarding suppliers. Before the introduction of the Act, these assessment processes included legal, IT, risk and privacy reviews to ensure suppliers were compliant with best practices in their respective fields.

Findex has a whistleblowing facility which allows employees to report instances of improper conduct. The Whistle-blower Policy comprises several policies and codes that promote a culture of compliance, honesty and ethical behaviour within Findex.

Findex has commenced the development of a Sustainability Strategy, which will address environmental, social and governance pillars. In FY21 Findex seeks to complete our materiality assessment which will identify the key material topics to be addressed within our strategy. Some of our defined material boundaries include respecting human and labour rights within our workforce, operations and supply chain and mitigating the risk of modern slavery occurring in our operations and supply chains. Once developed, our sustainability reporting will present performance on our material boundaries and initiatives addressing our Modern Slavery Statement.

The key metric that Findex will use to assess our effectiveness in combatting modern slavery in our operations and supply chains is the number of suspected modern slavery incident reports received within Findex's operations and supply chains. During FY2021 there were no reports of modern slavery with Findex operations or supply chains.

If modern slavery related issues are identified, Findex will work with the supplier to develop corrective actions with agreed deliverables and timeframes as part of a remediation plan.

Additional Modern Slavery key performance indicators may be considered and introduced during the FY21-22 Year, including:

- The number of modern slavery training and awareness-raising programs completed by Employees
- The number of completed Findex Supplier Questionnaires
- The number of contracts that include modern slavery clauses.

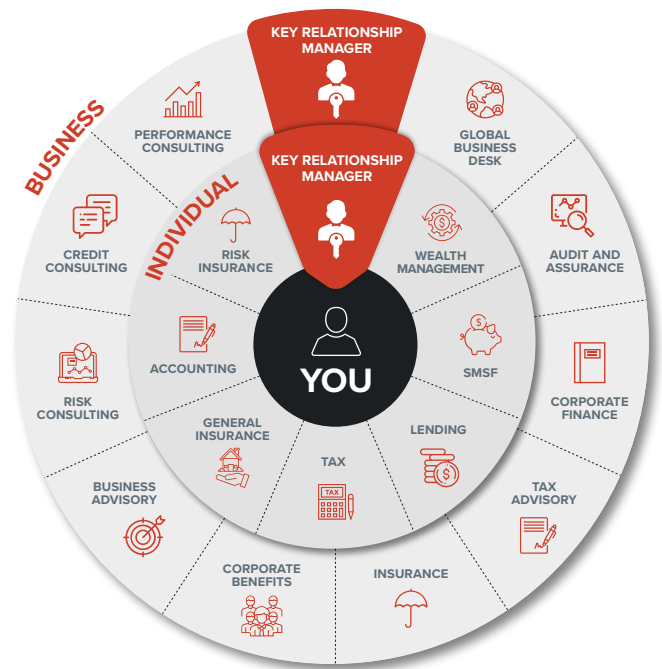


Diagram 1: Integrated delivery method via our Family Office model

Findex has adopted a continuous improvement approach to our modern slavery processes. During FY2022, our key focus will be:

- Continued organisational-wide awareness and stakeholder engagement on the modern slavery compliance requirements, including additional promotion of the Modern Slavery Policy and a promotion of the Modern Slavery e-Learning Module to all Employees, and specially targeted at required completion for our employees who are involved in the procurement processes.
- Progress development of additional Modern Slavery key performance indicators and integrate into the Findex sustainability reporting.

Spiro Paule
Managing Director & Chief Executive Officer
Findex Group Limited
 29 October 2021

Tony Roussos
Executive Director & Chief Operations Officer
Findex (Aust) Pty Ltd
 29 October 2021