

Domain
Group

Modern Slavery Statement 2025



Domain Holdings Australia Limited
ABN 43 094 154 364



Domain Group

Modern Slavery Statement 2025

1. Introduction

This Statement

This Modern Slavery Statement (**Statement**) is made by Domain Holdings Australia Limited ABN 43 094 154 364 (**Domain**) and covers Domain and its controlled entities as at 30 June 2025 (**Domain Group**). The members of Domain Group are listed in the schedule to this Statement.

This Statement is Domain's Modern Slavery Statement pursuant to the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

The purpose of this Statement is to outline Domain Group's approach to ensuring that its business is conducted within a framework that minimises modern slavery risks in its operations and supply chains.

Reporting entity

The reporting entity for the purposes of this Statement is Domain.

This Statement covers the Domain Group. Except where noted otherwise in this Statement, arrangements referred to as those of the Domain Group are applicable to all members of the Domain Group.

Reporting period

This Statement covers the reporting period from 1 July 2024 to 30 June 2025 (**Reporting Period** or **FY25**).

Except where otherwise stated, the descriptions of Domain's business, governance, operations, and supply chains reflect the state of affairs as at the end of the Reporting Period.

2. The Domain Group's Commitment to Human Rights

Domain recognises that freedom from slavery and servitude is a fundamental human right.

Domain Group is committed to conducting its business in a manner that respects and supports human rights, including the human rights of those involved in its operations and supply chains. This commitment is informed by the United Nations (**UN**) Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights, the UN Global Compact and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and has been documented in Domain's Human Rights Policy which is available at Domain's Shareholder Centre website at shareholders.domain.com.au.

In addition to the expectations set out in Domain's Human Rights Policy, Domain's expectations of Domain Group's suppliers are documented in Domain Group's Supplier Code of Conduct, which is also available at shareholders.domain.com.au. Both policies are reviewed periodically to ensure they continue to reflect and engender appropriate aspirations and controls in respect of human rights standards in Domain Group's operations and supply chains.

Domain understands that modern slavery manifests in various forms, often characterised by coercion, threats, or deception used to exploit victims and deprive them of their freedom. Along with traditional slavery and servitude (where individuals are treated as 'property'), modern slavery may take the form of human trafficking, forced labor, debt bondage, forced marriage, or certain egregious forms of child labor and exploitation.

Domain acknowledges that the risks of modern slavery are significant for many people and communities around the world. Modern slavery occurs in Australia, and is prevalent in some other jurisdictions that are major exporters of goods and services to Australia. Domain understands that by holding itself, its controlled entities and their respective suppliers to human rights standards, Domain Group can impact and influence the rights and freedoms enjoyed by, and the quality of life of, its workers and those involved in its supply chains, both in Australia and around the world.

3. Structure of Domain Group

As at the date of this Modern Slavery Statement, Domain is a public company registered under the *Corporations Act 2001* (Cth) (**Corporations Act**). Domain was listed on the Australian Securities Exchange throughout the Reporting Period (ASX:DHG).

Domain's registered office is located at Level 5, 100 Harris Street, Pyrmont, New South Wales 2009.

Throughout the Reporting Period, Domain's largest shareholder was Nine Entertainment Co. Holdings Limited (ASX:NEC, **Nine**). As at the end of the Reporting Period, Nine had a 60.05% shareholding in Domain.

The members of Domain Group as at the end of the Reporting Period were Domain and its controlled entities listed in the schedule to this Statement. All but two of the members of Domain Group are companies incorporated in Australia. The two foreign entities in Domain Group are Domain Group New Zealand Limited (incorporated in New Zealand) and Domain Group Philippines, Inc. (incorporated in the Philippines).

Domain Group is headquartered in Sydney, Australia, with additional offices in Melbourne, Canberra, Brisbane, Perth, Adelaide and Manila (Philippines). Domain also has employees based in New Zealand.

As at 30 June 2025, Domain Group had approximately 1086 employees, the majority of which were ordinarily based in Australia.

4. Governance relating to Modern Slavery during the Reporting Period

Domain's Board of Directors is ultimately responsible for the corporate governance of Domain Group. Details of the Board's responsibilities as at the end of the Reporting Period are set out in the Board's Charter, which is available on Domain's shareholder website, shareholders.domain.com.au.

Throughout the Reporting Period, the Board delegated specific responsibilities for managing and overseeing modern slavery risks, and opportunities for continual improvement, to two Board subcommittees – the Audit & Risk Committee (**ARC**) and the People, Culture & Sustainability Committee (**PCSC**).

Broadly speaking, during the Reporting Period, the ARC was responsible for monitoring and overseeing the controls on risk generally, including supply chain and human rights risks; and the PCSC was responsible for overseeing Domain Group's employment and outsourced labour hire practices, as well as the development of policies and procedures for ensuring Domain Group's operations are managed in compliance with applicable labour laws and human rights standards.

In the Reporting Period, the ARC was responsible for reviewing and approving Domain's annual plan to identify and manage modern slavery risks and to improve Domain Group's posture in this area, received periodic updates from Management on matters relating to Domain Group's supply chain risk management program and provided relevant updates to the Board. In addition, the ARC was responsible for overseeing the development of this Modern Slavery Statement, and submitted it to the Board of Directors for approval prior to lodgement with the applicable regulator. Further details of the ARC's and PCSC's respective responsibilities during the Reporting Period are set out in their Charters, which are available on Domain's shareholder website, shareholders.domain.com.au.

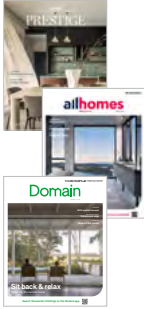
At a Management level, during the Reporting Period, Domain Group's Supply Chain Oversight Committee (**Oversight Committee**) had ultimate Management-level accountability for overseeing modern slavery risks, and for ensuring that the ARC and PCSC were afforded the oversight necessary for them to effectively discharge their duties pertaining to modern slavery risk management. The Oversight Committee was supported by a Supply Chain Oversight Working Group (**Working Group**) comprising members of Domain Group's Legal, Procurement, Finance, People and Performance, and Environment, Social and Governance (**ESG**) teams, who carried out relevant day-to-day operational activities such as supply chain mapping, modern slavery risk assessments, communicating Domain Group's human rights expectations to Domain's workforce and suppliers and maintaining appropriate records. Consistent with Domain Group's 'continuous improvement' approach to the management of modern slavery risks, the Working Group was also responsible for considering the effectiveness of Domain's actions in relation to modern slavery risk management and developing new strategies to improve Domain Group's posture going forward.

5. Operations of Domain Group

Initially launched as a home and lifestyle section of Fairfax Media Newspapers in 1996, today, Domain Group is a leading Australian property marketplace, with the purpose to inspire confidence in life's property decisions.

Domain's business operates across two main segments: **Core Digital** (including Residential, Media, Developers & Commercial, Agent Solutions and Domain Insight) and **Print** (through the distribution of Domain, Domain Prestige and Allhomes magazines). These segments and their respective business offerings are summarised below.

Business offerings	Description	Brands
Core Digital		
Residential	Domain's Core Residential business comprises the Domain and Allhomes portals that offer online residential listings of 'for sale' and rental properties across web, mobile and social media platforms. Domain is used by millions of Australians to browse, search, buy, rent and sell property. Allhomes is one of the most well-known and trusted property website brands in the Australian Capital Territory and Southern New South Wales.	 
Media, Developers & Commercial	Media: offers digital display advertising and marketing opportunities that enable brands and corporations to connect with Domain's quality consumer audiences. Developers: provides listings and advertising related to residential property developments. Commercial: delivers digital subscription, listings and display advertising for a range of sectors including office, retail, industrial and businesses for sale.	  
Agent Solutions	Agent Solutions includes a suite of digital workflow tools that help agents build profitable and sustainable businesses, including: Pricefinder: produces property data, insights and reporting tools. Real Time Agent: delivers digital agency agreements, auction tools and contracts, helping remove paperwork for agents to increase efficiency. LeadScope: provides valuable actionable insights to agents through its AI-driven predictive technology, identifying properties that are most likely to come to market. Realbase: offers leading campaign management platforms Realhub and CampaignTrack, social media marketing solution AIM and digital proposal tool Engage. Homepass: an open-for-inspection tool.	        
Domain Insight	Domain Insight delivers high quality property data, property valuation services, insights and data platforms to consumers, agents, governments, financial institutions and other corporations. Solutions include: Pricefinder: a property research platform which provides extensive insights and reporting tools. Automated Valuation Model (AVM): a valuation solution which delivers real-time property valuation for approximately 13 million residential properties in Australia. Insight Data Solutions (IDS): a property data business acquired by Domain in 2021, which services the government sector with statutory valuations, insights and analytics through its VM Online platform.	  

Business offerings	Description	Brands
Print		
Print publications	Domain's print publications connect agents and vendors with a high quality, high intent and exclusive audience that has limited overlap with digital platforms. Print revenue comprises lifestyle content and property listing advertising in the Domain, Domain Prestige and Allhomes magazines. Domain and Domain Prestige are distributed through Nine's leading publications, The Sydney Morning Herald, The Age and The Australian Financial Review, whilst Allhomes is available through The Canberra Times. The Victorian edition of Domain Prestige is also distributed directly to letterboxes in select suburbs of Victoria.	

6. Supply Chains of Domain Group

Domain Group's supply chain consists of a range of suppliers of goods, products and services, predominantly in the following industries:

- cloud and software services;
- advertising and media including media agencies, production companies, advertising platforms and social media platforms;
- IT hardware and telecommunications;
- print services and distribution;
- data and information services;
- outsourced labour services;
- professional services such as legal, investment banking, tax, accounting and recruitment; and
- building services, facilities management and office equipment.

Domain Group's material suppliers (determined by value of expenditure) are based in Australia, the United States of America, Ireland, the United Kingdom, New Zealand, Singapore, Belgium and the Netherlands, all of which are jurisdictions which are rated low for prevalence of modern slavery practices in the Global Slavery Index.¹

A small number of material suppliers are located in other jurisdictions that are rated higher for prevalence of modern slavery practices, including the Philippines, China and India.²

¹ Walk Free 2023, Global Slavery Index 2023, Minderoo Foundation. Available from: walkfree.org/global-slavery-index (**Walk Free Global Slavery Index 2023**).

² Walk Free Global Slavery Index 2023.

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

Domain considers that its overall exposure to operational and supply chain modern slavery risks is low. The assessments performed and actions taken during the Reporting Period in arriving at this view are detailed further in this section.

At a high level, Domain's supply chain risk management program for the Reporting Period comprised:

- **Assessing and Addressing Operational Risk:** Assessing operations for risk factors and taking action to mitigate identified risks;
- **Assessing and Addressing Supply Chain Risk:** Including assessing all suppliers for modern slavery risks, determining whether suppliers who were identified as high- or medium-risk should remain in Domain's supply chain, and offboarding suppliers where appropriate;
- **Policy Framework:** Having and enforcing appropriate policies in order to ensure Domain Group's direct operations are conducted in accordance with human rights standards;
- **Setting Clear Supplier Expectations:** Clearly conveying Domain's human rights and supply chain standards to suppliers and reinforcing those expectations at regular intervals;
- **Training and Awareness:** Ensuring that Domain Group staff and suppliers are aware of Domain's commitments to upholding human rights standards and are empowered to raise concerns, should they arise;
- **Escalation Mechanisms:** Maintaining effective communication channels to ensure that staff and suppliers have the means to raise concerns and that any such concerns are appropriately escalated and managed; and
- **Continuous Improvement Measures:** Reflecting on the effectiveness of initiatives, identifying opportunities for improvement in Domain's supply chain risk management program and developing specific strategies for implementation.

A description of Domain Group's activities during the Reporting Period in each of these areas is provided below.

Assessing and Addressing Operational Risk

Domain has a range of measures in place to assess and address operational risk factors. These include having a strong culture of respect for individual freedoms and human rights (see in sections 2 and 4 of this Statement), a clear policy framework in place that is regularly reviewed for compliance with local laws and workplace health and safety standards (see this section 7 under "Policy Framework"), and well established escalation and grievance mechanisms in place so that staff are empowered to seek support and raise concerns should they arise (see this section 7 under "Escalation Mechanisms").

During the Reporting Period, Domain did not detect any incidents of modern slavery in its operations, and modern slavery risks throughout Domain Group's operations were determined to be low. Domain Group's operations were primarily conducted by skilled professionals working in Australia, New Zealand and the Philippines. Regardless of where they were located, Domain Group employees were managed and supported through a centralised Domain Group People and Performance team, supported by employment policies and practices that are underpinned by a respect for internationally recognised human rights. By contrast with Australia and New Zealand, which respectively rank #149 and #148 out of 160 countries globally for prevalence of modern slavery risk, Domain recognises that the Philippines is a higher risk jurisdiction, being ranked the 36th highest prevalence jurisdiction.³ However, Domain took a range of steps in the Reporting Period to monitor for modern slavery incidents in its Philippines operations and none were detected.

Overall, Domain considers that its operational risk factors in the Reporting Period were broadly consistent with the prior reporting period and assesses its exposure to modern slavery risk in its operations in the Reporting Period to have been minimal. However, Domain recognises that certain attributes of its business operations do give rise to some risk. The key modern slavery risk factors in Domain Group's operations are set out below, along with a description of the measures implemented to monitor and manage those risks.

³ Walk Free Global Slavery Index 2023.

Risk

Measures implemented during Reporting Period

Maintaining an offshore workforce in the Philippines

While the majority of Domain Group staff are located in Australia and a small number are located in New Zealand (which are low risk jurisdictions for modern slavery⁴), Domain Group maintains an offshore workforce in the Philippines, which is a relatively higher-risk jurisdiction.⁵

- **Screening and benchmarking:** Domain implemented and maintained a range of processes and procedures to ensure that all Domain Group employees in the Philippines have legal rights to work, are over the age of 18 and are paid fair wages.
- **Local legal counsel retainer:** Domain Group maintained a retainer with a local law firm in the Philippines to perform a range of tasks such as providing advice on local labour laws and reviewing employment contracts for compliance with applicable legal standards.
- **Centralised group-wide administration:** Employment practices in the Philippines were monitored by Domain Group's centralised People and Performance team and conducted in compliance with local labour laws and applicable human rights standards.
- **Site visits:** During the Reporting Period, senior staff from Domain Group's Australian offices attended the Philippines office and confirmed on the basis of their inspections that employment practices in the Philippines appeared to be appropriate and aligned with Domain Group's standards.
- **Monitoring for grievances:** As noted below, Domain maintained a range of employee engagement monitoring and grievance reporting mechanisms which are available to all Domain Group staff, including employees in the Philippines. There were no complaints raised during the Reporting Period regarding modern slavery risk in Domain Group's Philippines operations.

Outsourced labour hire

Domain periodically uses outsourcing arrangements for technology and product work. Domain acknowledges that outsourced labour hire arrangements present risks, and that these risks may be less visible to Domain than if the relevant workers were directly employed by Domain Group. The risk is elevated where the labour hire arrangements involve offshore work in higher risk jurisdictions.

- **Onboarding and ongoing review:** During the Reporting Period, outsourced labour hire service providers were subjected to screening for modern slavery risk factors. The specific steps taken varied from engagement to engagement depending on the circumstances and geographic location. At a minimum, the screening process included the supplier being provided with the Supplier Code of Conduct at six month intervals and being asked on each occasion to contact Domain if they had any concerns about their ability or willingness to comply with it. No such concerns were raised by Domain's outsourced labour hire partners during the Reporting Period.
- **Higher risk engagements:** Higher risk engagements, such as those involving workers in higher risk jurisdictions, may be subjected to additional modern slavery screening and audit requirements. Measures adopted with respect to such offshore labour hire providers include requiring the supplier to expressly agree to modern slavery compliance obligations as part of the contracting process and reserving rights for Domain to conduct compliance audits.
- **Enhanced oversight:** During the Reporting Period, Domain identified one new outsourced labour hire provider as having elevated modern slavery risks as a result of geographic factors. Domain mitigated the risk involved in using the relevant supplier by including modern slavery compliance and audit requirements in the applicable contractual terms and deploying a model under which the outsourced labour resources had direct relationships with and oversight by senior Domain staff. The contractual measures assisted in setting appropriate expectations with the supplier and giving Domain the ability to take action in the event that its expectations were not met. The operating model gave Domain enhanced oversight over the individuals providing the outsourced labour, reducing the possibility that modern slavery risks would subsist undetected.

4 According to the Walk Free Global Slavery Index 2023.

5 According to the Walk Free Global Slavery Index 2023.

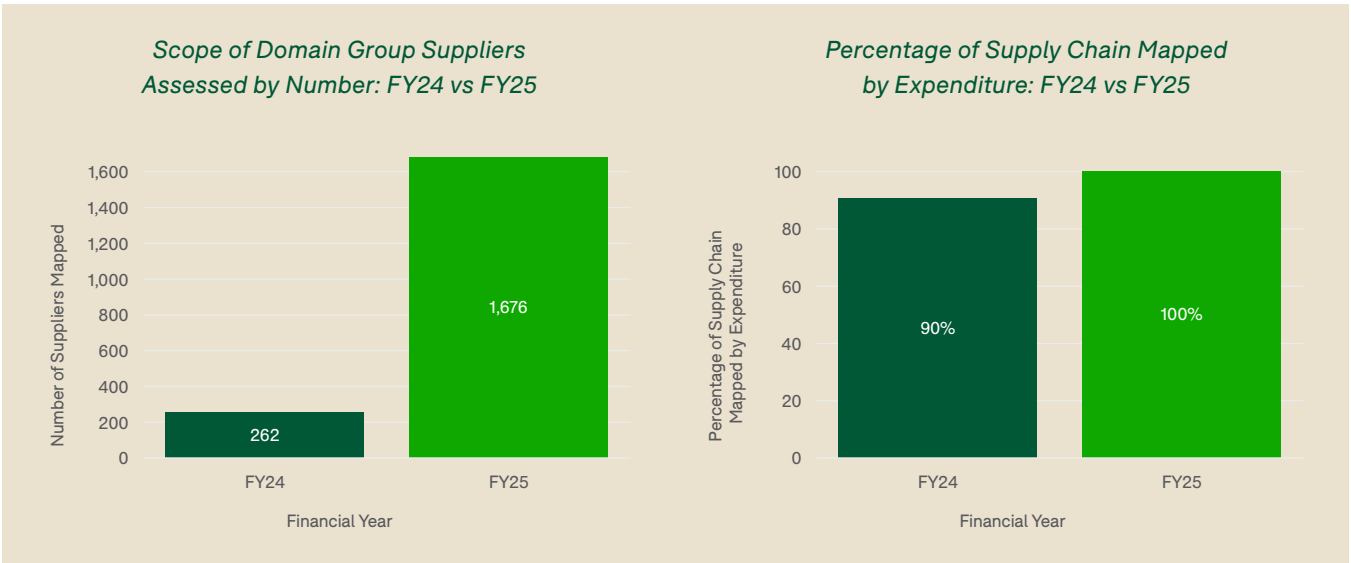
Assessing and Addressing Supply Chain Risk

In respect of the Reporting Period, Domain conducted modern slavery risk assessments for all direct suppliers to Domain Group (up from 90% by expenditure in the previous reporting period). Having conducted this review, 96.96% of suppliers to Domain Group were assessed as low risk. As a result, overall, Domain considers its supply chain risk level to be low.

The methodology that was applied in carrying out these risk assessments differs from that applied during previous reporting periods, and Domain considers that its revised methodology provided a more empirical and nuanced view of modern slavery risks in Domain Group’s supply chain than the methodology used previously. The methodology adopted for the FY25 Reporting Period is described in greater detail below.

Supply Chain Mapping and Assessments

In the FY25 Reporting Period, Domain broadened the scope of its supply chain mapping and assessment exercise to cover 1676 suppliers, being 100% of all direct suppliers to Domain Group. This marked an improvement on previous periods, where the review process was limited to material suppliers by expenditure (262 direct suppliers accounting for approximately 90% of expenditure across Domain Group).



This expanded scope of review was coupled with the application of a new approach to assessing risk, in an attempt to provide a more comprehensive view of modern slavery risk within Domain Group’s supply chain (**FY25 Risk Matrix**).

By contrast with the methodology deployed by Domain in FY24 (which had a greater focus on geographic risk factors), under the FY25 Risk Matrix, the nature of the supply and the modern slavery risk factors in the relevant supply chains for producing those supplies for the Australian market were given greater weight in Domain’s risk assessment process. The range of factors considered by Domain in assigning a risk rating to each direct Domain Group supplier included:

- the nature of the supply;
- whether the supply is of a sort that is identified on the Walk Free Global Slavery Index⁶ as being associated with elevated operational or supply chain modern slavery risks when imported into or sold in the Australian market (such as IT hardware);
- geographic risk factors including available information about whether the supplier operates in a jurisdiction where modern slavery risks are known to be elevated;
- whether the supplier had expressly agreed to Domain’s Supplier Code of Conduct (or had its own equivalent policies and had committed to complying with them); and
- certain other publicly available information about the supplier, including the content of the supplier’s own modern slavery reporting (if available).

Unlike Domain’s FY24 risk assessment framework, which concluded with the assignment of a risk rating, Domain’s FY25 Risk Matrix both assigned a risk rating and also prescribed a range of actions to be taken in relation to those suppliers that were identified as posing medium or high risks of modern slavery. See “Taking Action to Address Supply Chain Risk” below for further information.

6 Walk Free Global Slavery Index 2023.

Outcomes of Risk Assessment

In assessing the 1676 suppliers engaged to provide goods, services or other supplies to Domain Group during the Reporting Period against its FY25 Risk Matrix, Domain identified that of Domain Group’s suppliers for the Reporting Period:

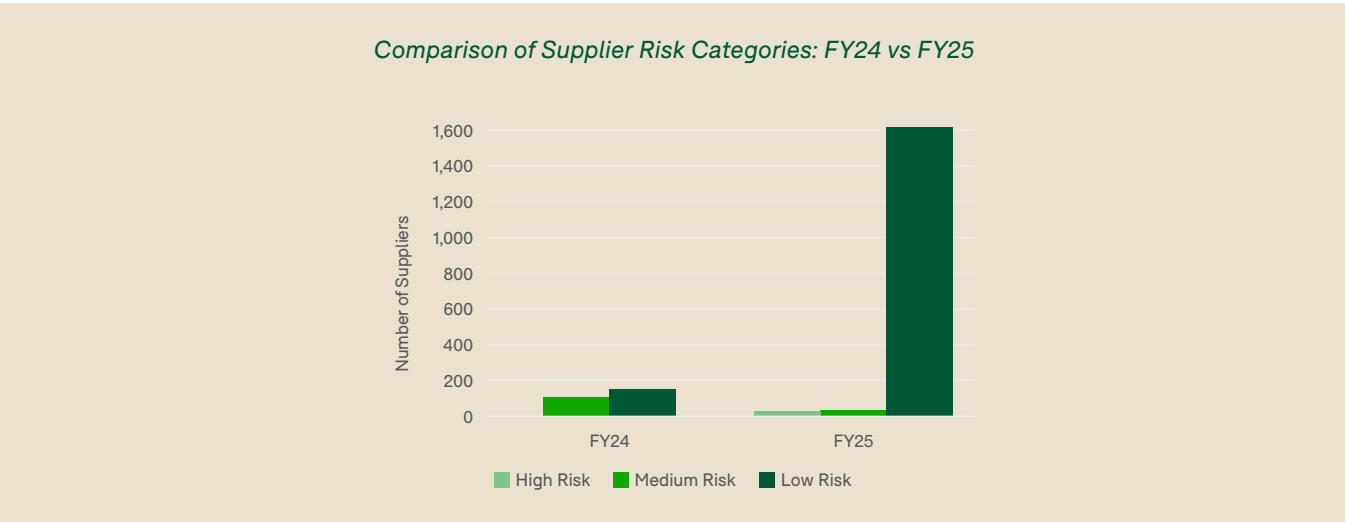
- 1625 suppliers were ‘low risk’, equating to 96.96% of Domain’s direct supply chain by number of suppliers;
- 26 suppliers were ‘medium risk’, equating to 1.55% of Domain’s direct supply chain by number of suppliers; and
- 25 suppliers were ‘high risk’, equating to 1.49% of Domain’s direct supply chain by number of suppliers.



Understanding the Changes in Risk Profile over Time

There has been a change in the number and proportions of low-, medium- and high-risk suppliers identified by Domain in respect of the Reporting Period when compared to the numbers in those categories in the previous reporting period, as set out below.

Financial Year	High Risk Suppliers	Medium Risk Suppliers	Low Risk Suppliers
FY24	0	108	154
FY25	25	26	1625



There was a considerable shift in the total number of suppliers per risk category as between FY24 and FY25. However, the underlying size and composition of Domain’s supply chain was relatively consistent over the two periods. Domain considers that the year-on-year differences in numbers of suppliers per category are an outcome of using a more detailed risk matrix in FY25, rather than a change in underlying risk levels. By broadening the risk mapping exercise to 100% of the direct supply chain and applying a more nuanced assessment methodology, Domain considers that it has incrementally improved its understanding of its supply chain during the Reporting Period.

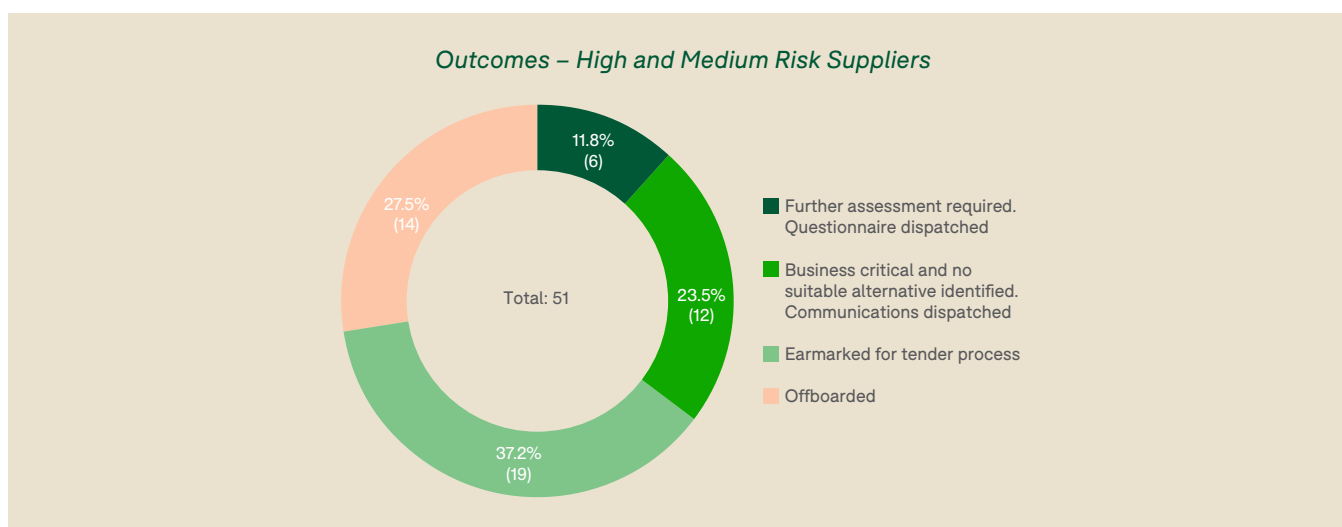
Importantly, FY25 is the first reporting period in respect of which Domain has identified high risk suppliers in its supply chain. Domain considers that the identification of high risk suppliers this year is a beneficial outcome of its investment in supply chain mapping and demonstrates its increased risk awareness. Identifying high risk suppliers also positions Domain to take action to address risk in a more targeted fashion in future reporting periods.

Taking Action to Address Supply Chain Risk

Where a supplier was categorised as presenting medium or high risks for modern slavery in its operations or supply chains, additional consideration was given to whether the supplier was appropriate to remain in Domain Group's supply chain or whether the supplier should be offboarded, receive further communication from Domain or be marked for detailed reassessment and considered for potential replacement by an alternative supplier.

The following actions were taken in relation to the 51 suppliers who were identified as presenting medium or high levels of risk:

- 14 were offboarded as suppliers from Domain's purchasing system;
- 19 were earmarked for assessment against alternative suppliers and possible replacement via future planned tender processes. These suppliers remain in Domain's supply chain pending the tender processes;
- 12 were identified as being business critical suppliers without suitable alternatives at this time. Those suppliers remain in Domain Group's supply chain for the time being notwithstanding their risk profile. The Working Group provided such suppliers with further communications in Q1 of FY26 to underscore Domain's interest in those suppliers' modern slavery risk posture and the expectation that they take action to identify and address modern slavery risks in their operations and supply chains; and
- 6 were classified as requiring further assessment in order to finalise their risk ratings. Those suppliers were sent a detailed modern slavery questionnaire in Q1 FY26 to empower Domain to make informed decisions about their appropriateness to remain in Domain's supply chain.



Policy Framework

Throughout the Reporting Period, Domain Group had a range of formal policies in place that promote ethical and legal business conduct, both internally and within its supply chains, including Domain's:

- Human Rights Policy;
- Code of Conduct;
- Speak Up (whistleblower) Policy;
- Anti-Bribery and Corruption Policy; and
- Supplier Code of Conduct.

The Human Rights Policy, Code of Conduct, Speak Up Policy and Anti-Bribery and Corruption Policy relate to Domain Group's operations and are applicable to all Domain Group Directors, employees and contractors, among others.

The Supplier Code of Conduct applies to Domain Group's supply chain, and sets out minimum standards that Domain Group expects of its suppliers.

Copies of these policies are available at Domain's Shareholder Centre website at shareholders.domain.com.au. The policies that apply to Domain Group staff are also available on Domain Group's staff intranet for ease of reference, and the Supplier Code of Conduct is generally communicated to new suppliers as part of onboarding and reinforced by follow up communications at regular intervals (see "Settling Clear Supplier Expectations" below for further information).

During the Reporting Period, all relevant policies were reviewed by Management to determine whether changes were advisable, including from a modern slavery risk management perspective. The review resulted in the PCSC and the Domain Board approving updates to the Human Rights Policy, which now expressly states Domain's commitments to:

- safe and healthy work environments for Domain's people and suppliers;
- the protection of vulnerable groups; and
- prohibiting forced labour, human trafficking and hazardous child labour in Domain's operations and supply chains.

The updated Human Rights Policy was adopted by the Board on 27 May 2025. Opportunities for improvement of the Supplier Code of Conduct were also identified and are planned to be proposed to the relevant governing body of Domain in the FY26 reporting period.

Setting Clear Supplier Expectations

As noted above, Domain's Supplier Code of Conduct sets out the minimum standards that Domain Group expects of its suppliers.

Domain communicates and reinforces its expectations that suppliers to Domain Group comply with the Supplier Code of Conduct in a number of ways.

- **Inclusion in standard form supplier contracts:** During the Reporting Period, Domain updated relevant standard form contracts to include provisions which contractually obligate suppliers to comply with Domain's Supplier Code of Conduct or to have and comply with their own equivalent policy or policies.
- **Onboarding:** The majority of Domain Group's suppliers are directly engaged by Domain or one of its wholly owned subsidiaries and onboarded using a centralised vendor management system (**VMS**). During the Reporting Period, new suppliers onboarded through the VMS were provided with the Supplier Code of Conduct and asked to positively acknowledge and agree to the terms of the Supplier Code of Conduct as a condition of onboarding. A small number of Domain's wholly owned subsidiaries are not currently using Domain's centralised VMS. New suppliers to these entities were notified of the Supplier Code of Conduct as part of or within 6 months after onboarding. Across Domain and its controlled entities, where a supplier rejected or raised concerns about its ability to comply with the Supplier Code of Conduct, Domain liaised with the supplier to understand their specific concerns and the Chair of the Working Group was engaged to assess whether they were suitable for admission to, or continued participation in, Domain Group's supply chain.
- **Regular reinforcement:** In addition to providing suppliers with the Supplier Code of Conduct during or after the onboarding process, at regular intervals (approximately every six months) Domain Group reminds suppliers of the expectation that they comply with it. In these communications, Domain reminds suppliers to read and familiarise themselves with the Supplier Code of Conduct and requires them to contact Domain Group if they have any concerns or are unable to comply with it for any reason. This process was complied with during the Reporting Period.

Training and Awareness

Domain remains committed to raising awareness and providing appropriate training to its workforce on combating modern slavery. Our efforts during the Reporting Period included:

- **Business-wide communications:** In March 2025, Domain staff received communications highlighting Domain's program for assessing and addressing modern slavery risk, and the mechanisms for raising concerns.
- **Training and research:** Members of Domain's Working Group participated in training and research on subjects including legal developments and industry approaches to monitoring and addressing modern slavery risks. They applied these learnings in their roles and shared their knowledge within their respective functions where relevant.
- **Policy updates:** Domain's Human Rights Policy was amended to include aspirations related to Domain Group's supply chain, expressly stating the Group's commitment to prohibiting forced labor and human trafficking in its operations and supply chains.

Grievance Mechanisms & Engagement Monitoring

Throughout the Reporting Period, Domain maintained a range of grievance mechanisms to ensure that people involved in its operations and supply chain had access to appropriate channels to be able to communicate any concerns regarding modern slavery risks (among other issues) and that any identified incidents would be escalated and remediated.

These mechanisms included:

- maintaining and monitoring the supplychain@domain.com.au email address, which is highlighted in the Supplier Code of Conduct as a pathway for suppliers to raise their concerns; and
- Domain's whistleblower policy, referred to as the "Speak Up Policy". The Speak Up Policy, including details of Domain's whistleblower hotline, is available at Domain's Shareholder Centre website at shareholders.domain.com.au. The Speak Up Hotline is a confidential, independent, externally managed hotline which enables whistleblowing reports to be made, including on an anonymous basis if preferred. It is referenced in the Code of Conduct and the Supplier Code of Conduct as a means by which staff and suppliers can raise complaints and concerns regarding unethical conduct in a confidential manner.

In addition to monitoring and managing grievances, Domain proactively undertakes employee engagement monitoring every six months. Among other things, all staff are encouraged to complete an anonymous Domain Group-wide engagement survey, the results of which assist Domain to gauge whether Domain Group's operations are conducted in a manner that is supportive of the rights and dignity of its workers. The engagement surveys completed during the Reporting Period included questions regarding the perceived fairness of working conditions, including the availability of appropriate levels of flexibility and autonomy. The more comprehensive annual survey also included free text sections in which employees could anonymously raise their views and concerns. Domain actively seeks to manage any complaints or concerns raised in engagement surveys.

Continuous Improvement Measures

FY25 Risk Assessment Matrix

As noted above, in FY25, Domain implemented a new methodology for screening modern slavery risks across 100% of its direct suppliers, a shift from the FY24 system that only assessed material suppliers by expenditure. The new procedure was developed by Domain during the FY24 reporting period and applied for the first time in FY25. Domain considers that the FY25 Risk Matrix has provided a broader and a more nuanced and empirical view of its supply chain than the previous risk assessment methodology. By prescribing actions to be taken in response to a medium or high risk rating, Domain considers that the FY25 Risk Matrix has also improved the overall efficacy of Domain's anti-modern slavery program, driving incremental change in the composition of Domain's supply chain.

Due Diligence Methodologies

As part of Domain's commitment to continuous improvement, during the Reporting Period, the Working Group invested time in investigating alternative market approaches to modern slavery due diligence. This included completing a proof of concept with an ESG data and due diligence provider, and developing a questionnaire that was sent to select medium and high risk suppliers in Q1 FY26. Both initiatives were geared at incrementally improving Domain's understanding of modern slavery risks in Domain Group's operations and supply chain over time, and its ability to take targeted action to address risk where it exists.

8. How Domain assesses the Effectiveness of its Actions

Domain is committed to reviewing the effectiveness of its processes. Insights gained from assessing the effectiveness of Domain's actions in previous reporting periods enabled Domain to identify opportunities for enhancement and drive year-on-year progress in its efforts to assess and address modern slavery risks.

During the Reporting Period, Domain assessed the effectiveness of its supply chain risk management program in the following ways.

- **Reviewing own practices:** The Working Group reviewed the key components of Domain's modern slavery compliance program. At the conclusion of this review process, a report was produced for the Oversight Committee outlining the efficacy of the existing risk management program and recommending action to be taken in FY26 to improve effectiveness.
- **Reviewing alternative practices:** Members of the Working Group considered the FY25 Risk Matrix against a range of alternative modern slavery risk assessment practices, such as the engagement of third party due diligence service providers and the deployment of questionnaires and other information gathering tools to increase visibility of supply chain risk. These alternative practices served as a point of comparison for the Working Group in assessing the efficacy of its current practices.

- **Whistleblowing and employee engagement monitoring:** Domain's practices of continually monitoring whistleblowing complaints and employee engagement enable Domain to ensure that employees and members of Domain Group's supply chain are empowered to raise concerns and identify any areas for improvement in the effectiveness of Domain's modern slavery risk management program. During the Reporting Period, no complaints of modern slavery practices were raised through these channels.

9. Process of Consultation with Owned or Controlled Entities

This Statement has been made in consultation with and on behalf of all members of Domain Group.

The members of Domain Group – many of which do not have physical operations, assets or employees – are subject to the same policies as Domain and have Domain-nominated Directors on their Boards. Domain Group members use the same centralised Purchasing, Procurement, Treasury, Legal and Finance teams for onboarding any material suppliers, and use the same centralised Domain People and Performance team for managing and supporting personnel. Those centralised functions, in turn, report to Domain Management. As part of its consultation process with Domain Group controlled entities, Domain has engaged with Directors on subsidiary Boards, centralised functional teams and the members of Domain Management that they report to.

Domain considers that it has undertaken an effective consultation process that reflects the relationship between the members of the Domain Group, and has effective oversight of Domain Group's activities, people and supply chains. The Company Secretary of Domain, who is also the Company Secretary of almost all members of the Domain Group, has participated in the process of preparing this Statement.

10. Other Relevant Information

a. Mandatory criteria under the Modern Slavery Act

Under the Modern Slavery Act, a Modern Slavery Statement must address seven mandatory criteria. Those criteria are set out in section 16 of the Modern Slavery Act. The table below sets out where each criterion is addressed in this Statement.

Criterion	Section of Modern Slavery Act	Relevant section(s) of this Statement
Identify the reporting entity.	Section 16(1)(a)	Section 1 (<i>Introduction</i>)
Describe the structure, operations and supply chains of the reporting entity.	Section 16(1)(b)	Section 3 (<i>Structure of Domain Group</i>) Section 5 (<i>Operations of Domain Group</i>) Section 6 (<i>Supply Chains of Domain Group</i>)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	Section 16(1)(c)	Section 7 (<i>Actions and Procedures Undertaken in Reporting Period to Assess and Address Modern Slavery Risks</i>)
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Section 16(1)(d)	Section 7 (<i>Actions and Procedures Undertaken in Reporting Period to Assess and Address Modern Slavery Risks</i>)
Describe how the reporting entity assesses the effectiveness of such actions.	Section 16(1)(e)	Section 8 (<i>How Domain Assesses the Effectiveness of its Actions</i>)
Describe the process of consultation with any entities that the reporting entity owns or controls.	Section 16(1)(f)	Section 9 (<i>Process of Consultation with Owned or Controlled Entities</i>)
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Section 16(1)(g)	Section 10 (<i>Other Relevant Information</i>)

b. FY26 Priorities and actions

The following is a summary of some of the key priorities and actions Domain intends to focus on in the reporting period commencing 1 July 2025:

- sending out modern slavery questionnaires to select suppliers identified by Domain as high or medium risk, to assist in developing more nuanced supply chain risk assessments and action plans;
- further considering externally developed due diligence tooling and determining whether and how to integrate appropriate tooling into Domain's modern slavery risk management process; and
- reviewing the FY25 Risk Matrix and considering whether it should be updated to drive improvements in Domain's risk assessment and management processes going forward.

11. Approval of this Statement by Principal Governing Body of Reporting Entity

This Statement has been approved by Domain's Board of Directors in their capacity as the principal governing body of Domain on 25 August 2025.

12. Signature

This Statement is signed by Nick Falloon in his role as Chairman of Domain on 25 August 2025.

A handwritten signature in black ink, appearing to read 'Nick Falloon', with a large, stylized loop at the end.

Nick Falloon

Chairman of Domain

25 August 2025

Schedule – Domain Group members

as at 30 June 2025

Group member name	Country of incorporation	ABN / ACN
Domain Holdings Australia Limited	Australia	43 094 154 364
Alldata Australia Pty Ltd	Australia	44 144 020 744
All Homes Pty Limited	Australia	50 093 012 652
Australian Property Monitors Pty Limited	Australia	42 061 438 006
Bidtracker (VIC) Pty Ltd	Australia	85 611 220 823
Bidtracker Holdings Pty Ltd	Australia	35 620 961 702
Domain Group New Zealand Limited	New Zealand	–
Campaigntrack Pty Ltd	Australia	93 142 537 988
Commercial Real Estate Holdings Pty Limited	Australia	66 605 826 677
Commercial Real Estate Media Nominees Pty Limited	Australia	68 602 681 818
Commercial Real Estate Media Pty Limited	Australia	74 602 679 863
Commercialview.com.au Pty Limited	Australia	84 159 552 771
Domain Group Finance Pty Limited	Australia	89 619 554 602
Domain Operations Pty Limited	Australia	21 617 803 460
Homepass Australia Pty Ltd	Australia	16 602 046 480
Homepass Pty Ltd	Australia	90 600 128 327
IDS Gov Services Pty. Ltd.	Australia	47 629 959 333
Insight Data Solutions Holdings Pty. Ltd.	Australia	21 165 379 644
Insight Data Solutions Pty Ltd	Australia	35 151 319 694
MarketNow Payments Pty Ltd	Australia	68 645 651 967
Metro Media Publishing Pty Ltd	Australia	29 141 396 741
Metro Media Services Pty Ltd	Australia	16 160 994 212
MMP (DVH) Pty Ltd	Australia	83 144 821 269
MMP (Melbourne Times) Pty Ltd	Australia	99 159 873 668
MMP Bayside Pty Ltd	Australia	66 159 319 847
MMP Eastern Pty Ltd	Australia	97 159 661 364
MMP Greater Geelong Pty Ltd	Australia	90 159 938 806
MMP Holdings Pty Ltd	Australia	24 141 277 643
MMP Moonee Valley Pty Ltd	Australia	89 159 873 186
National Real Estate Media Pty Limited	Australia	56 602 439 574
National Real Estate Media Nominees Pty Limited	Australia	60 602 439 592
New South Wales Real Estate Media Pty Limited	Australia	12 602 713 913
Northern Territory Real Estate Media Pty Limited	Australia	14 602 713 922
Property Data Solutions (2) Pty Ltd	Australia	41 650 393 516
Property Data Solutions Pty Ltd	Australia	50 110 242 129
Queensland Real Estate Media Pty Limited	Australia	39 602 734 716
Domain Group Philippines, Inc.	Philippines	–
Realbase Pty Ltd	Australia	92 645 511 422

Group member name	Country of incorporation	ABN / ACN
Realhub Services Pty Ltd	Australia	80 119 877 333
Realhub Studios Pty Ltd	Australia	60 621 531 217
Realhub Systems Pty Ltd	Australia	48 608 435 990
Review Property Pty Ltd	Australia	52 159 320 519
South Australia Real Estate Media Pty Limited	Australia	45 601 949 491
Tasmania Real Estate Media Pty Ltd	Australia	41 602 734 725
Western Australia Real Estate Media Pty Limited	Australia	17 602 692 508
Workstream Technologies Pty Ltd	Australia	72 123 399 155