

Modern Slavery Statement 2020



Contents

1. Our structure, business and supply chains	3
2. Policies and governance	4
3. Risk assessment and mitigation.....	5
4. Our due diligence process	5
5. Training and capacity building.....	6
6. Looking ahead.....	6

This statement, pursuant to the Australian Modern Slavery Act 2018 (“the Act”) (Cth), sets out the actions taken by Money3 Corporation Limited ABN63 117 296 143 and its controlled entities (together referred to as the “Money3 Group”) to address modern slavery in our business and supply chain over the financial year ended 30 June 2020. This statement also includes the planned actions to mitigate the risk in future periods.

This statement is made after due consultations with key stakeholders in Money3 Corporation Limited and its controlled entities, including the CEO, CFO, COO, Risk Manager, the relevant Business Unit Leaders and their team. The Money3 Group’s Modern Slavery Statement 2020 was approved by its Board of Directors on 22 March 2021.

1. Our structure, business and supply chains

Structure

Money3 Corporation Limited is a publicly listed company incorporated in Australia, comprising of 13 wholly owned Australian subsidiaries, trading as Money3 and 9 wholly owned New Zealand subsidiaries trading as Go Car Finance.

At 30 June 2020, Money3 employed 195 staff at its head office in Melbourne, Australia (including sales staff), and 59 in Auckland, New Zealand.

Business

Money3 is a specialist provider of consumer finance for the purchase and maintenance of a vehicle in Australia and New Zealand. Our operations in Australia and New Zealand are focused on broker and dealer channels, and increasingly, a strong direct channel to market.

Supply chains

The Company has a relatively simple supply chain consisting of the purchase of office supplies, office equipment, uniforms for staff and procurement of professional services. The Company expects its suppliers and other persons with whom it has business relationships to respect human rights. The Company will not knowingly engage services where it could be complicit in human rights abuses.

Money3 Group has over 300 active suppliers across 10 supply categories that represent our major supply chain activities.

- Technology Services – computer hardware, telecommunication, software, data hosting and related services;
- Office Supplies – groceries, uniforms, stationery, first aid products;
- Building Services – plumbing, electrical, fire services, pest services;
- Marketing Services – digital advertising, industry reports, corporate promotions;
- Office Services – utilities, rental agent, copier services, document destruction, hygiene and cleaning services;
- Banking, funding and Corporate Services – transactional banking, debt financiers, stock exchange, stock brokers, legal services, insurance providers including brokers, conference room hire, etc.;
- Debt Collection Services – debt collector services, skip tracing, repossession agents and towing services;
- Credit Support Services – credit bureau, car valuation, bank statements, ID verification;
- Staff Services – recruitment services, job ads, workers compensation, employee assistance program, flu vaccinations; and
- Finance Broker / Dealers – finance brokers and car dealers.

1. Our structure, business and supply chains (cont.)

Countries in Money3's direct supply chain are predominantly located in:

- Australia
- New Zealand
- North America

Operations in
Australia and New
Zealand

Work force consists
of over 250 staff

Over 300 active
suppliers and ~\$15m
in annual spend

2. Policies and governance

Money3 Group has a strong corporate governance framework, overseen by the Audit and Risk Management Committee. Formal policies are already in place to promote ethical and responsible business practices. Several of these policies are relevant to modern slavery. This includes:

- Code of conduct
- Human rights policy
- Harassment and bullying policy
- Whistle-blower policy

Money3 Group has **zero tolerance** for any form of slavery practices, human trafficking, forced child labour or child exploitation. Money3 Group encourages the reporting of unlawful / unethical behaviour by its directors, employees, contractors and agents and actively promotes ethical behaviour and protection for those who report violations.

If Money3 Group becomes aware of suppliers or third parties that has been associated with human rights violations, appropriate action will be taken in a timely manner. These actions include engaging with the relevant parties to promote good practice and / or avoiding or exiting the business relationship.

Our corporate website contains more detail on our approach to corporate governance.

3. Risk assessment and mitigation

We have conducted a risk assessment of suppliers in our operations and supply chain with respect to modern slavery risks.

Money3 Group operates in a low-risk sector (being financial markets). We considered the following risks:

- **Low risk: Possibly cause** modern slavery practices - Money3 Group has not identified any direct cause of modern slavery practices; for example, in any operational activities that are directly undertaken by Money3 Group employees.
- **Low risk: Contribute** to modern slavery practices - Money3 Group has identified there may be a small risk of contribution to practices through indirect suppliers; for example, where a local supplier sources material such as uniforms, utility consumables, technology hardware and services from an overseas supplier who may have a record of modern slavery practices.
- **Low risk: Directly linked** to modern slavery practices - Money3 Group has not been able to identify any direct linkage to modern slavery practices, for example, engagement with a supplier that employs modern slavery practices.

In assessing these risks, we considered specific factors such as:

- geographic location of supplier;
- value of spend;
- type of products or services procured, and
- suppliers' policies around modern slavery and human rights.

In addition to that, we referred to industry information such as modern slavery data and resources published by Non-Government Organisations ("NGO") and international organisations such as the International Labour Organisation and the Walk Free Foundation.

4. Our due diligence process

Our Procurement team have a number of risk mitigation and strong procurement procedures in place including our Supplier Engagement Principles and supplier on-boarding requirements.

Our due diligence process for supplier risk management considers the potential risks of engaging or extending a relationship with a supplier. Contracts above a certain threshold are required to be approved by the Board prior to entering into a relationship.

A risk rating is assigned to each supplier which is evaluated on a periodic basis. For significant suppliers, the Chief Operating Officer conducts periodic discussions with the suppliers on their service level performance, changes in their business practices and any key issues affecting their business.

5. Training and capacity building

During the reporting period, we held focus group sessions at executive management levels to create awareness around the risks of modern slavery practices including the requirements under the Act. We developed relevant policies covering conduct, human rights, etc. and enhanced procedures on procurement and supplier onboarding.

Staff were provided training on key policies in line with the Money Group's annual training program.

6. Looking ahead

Over the next year, our key focus areas include:

- Reviewing and updating our risk management policies and control measures;
- Enhance the due diligence process on procurement of suppliers and ongoing monitoring of current suppliers;
- Rolling out and implementation of a modern slavery clause in our contracts with suppliers;
- Continued engagement with our suppliers to support implementation of the Act and any relevant remediation actions;
- Increased audits on policy compliance over procurement, supplier onboarding and ongoing monitoring to ensure design and operating effectiveness of relevant controls; and
- Training programs to all staff within the Money3 Group to create awareness about modern slavery and specific training to procurement staff to detect risks of modern slavery in our supply chain.