



INVESTORS  
CENTRAL

ACN 143 097 385

# MODERN SLAVERY STATEMENT

Investors Central Limited

2025





## ■ IMPORTANT NOTICES

This Modern Slavery Statement (**Statement**) is made in accordance with the Modern Slavery Act 2018 (Cth) (**Act**) by Investors Central Limited ACN 143 097 385 (**Investors Central**) and its corporate subsidiaries (collectively referred to as **the Group**).

In this Statement a reference to "Investors Central", "we" and "our" is a reference to Investors Central Limited ACN 143 097 385 and its corporate subsidiaries for the period between 1 July 2024 to 30 June 2025 inclusive (**Reporting Period**).

The reporting entities and corporate subsidiaries captured by this Statement during the Reporting Period were Fin One Pty Ltd ACN 139 719 903, Finance One Commercial Pty Ltd ACN 634 900 548, Finance One Home Loans ACN 687 479 894, Strategic Collections Pty Ltd ACN 141 566 403, Commercial Credit Control Pty Ltd ACN 072 640 601, Fin One Services Pty Ltd ACN 654 881 160 and Finance One Management Pty Ltd ACN 675 105 478.

This statement may reference events occurring after 30 June 2025. Where this Statement contains forward-looking statements, these statements are based upon current expectations in regard to future events and there can be no representation or warranty that any forward-looking statements will be achieved.

## ■ INTRODUCTION

The Group recognises that human rights are of critical importance to its employees, shareholders, customers and the communities in which it does business. It acknowledges its responsibility to safeguard human rights through ethical and sustainable business practices. As well it recognises that modern slavery is a complex problem that can take multiple forms.

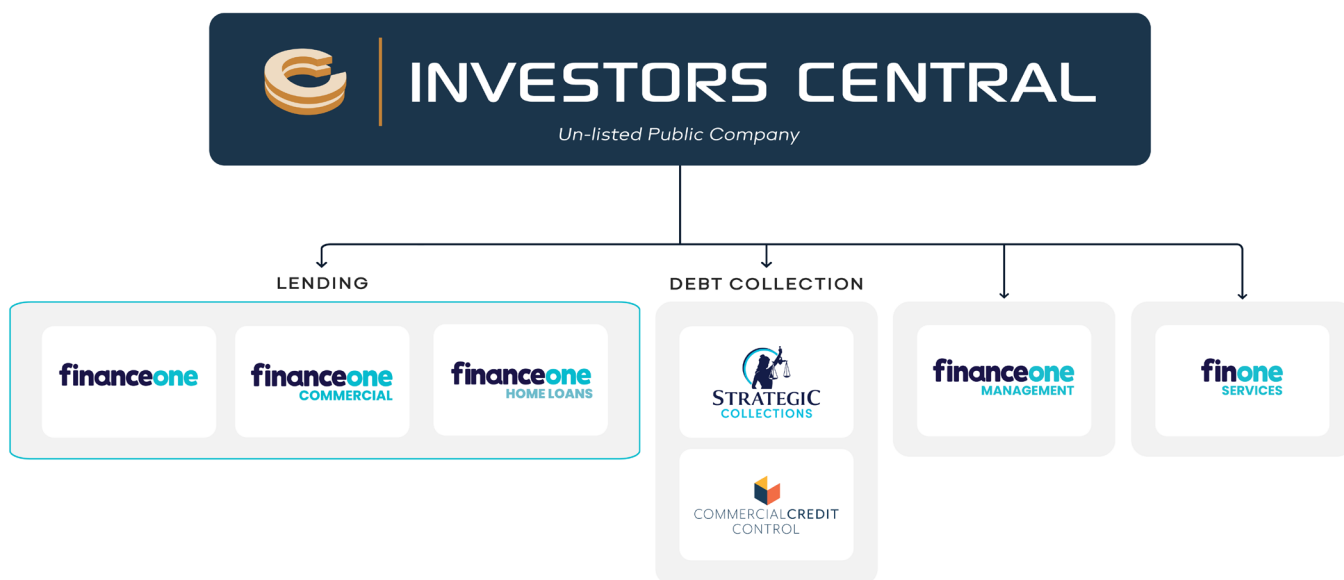
Modern slavery is fundamentally unacceptable within our business and addressing modern slavery risks is an important element in our overall approach to business and human rights.

This statement sets out the steps taken by the Group during the Reporting Period in identifying, assessing and managing modern slavery risks to ensure that modern slavery and human trafficking do not exist within its business and supply chains.

## ■ OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

### 3.1 STRUCTURE

Founded in 2010, Investors Central is an Australian unlisted public company that operates through wholly owned corporate subsidiaries, including entities which hold Australian Credit Licences enabling the Group to conduct its core business activities; lending and debt collection.



As a non-bank lender, Fin One Pty Ltd, Finance One Commercial Pty Ltd and Finance One Home Loans (**Finance One**) writes consumer and commercial loans, taking a compassionate and flexible approach to lending. The business model has traditionally been based on servicing borrowers that fall outside traditional lenders' guidelines or are underserved by larger lenders, providing more Australians with an opportunity to access finance.



In 2021, the Group diversified its business activities and established a debt collection division, Strategic Collections and Commercial Credit Control. In 2021, the Group established Fin One Services and in 2024, the Group established a new subsidiary, Finance One Management. These subsidiaries currently provide limited services for the Group, with the intention that further services are to be delivered over time.

The Group strives to tailor finance solutions for everyday Australians. Integral to Finance One's flexible strategy is embedding a culture that encourages responsibility with credit for our people to conduct themselves in accordance with the Group's values of Customer Commitment, Accountability, Empowerment and Integrity.



The Group believes in fairness, genuine respect, real service, and a compassionate approach when working with customers to overcome any loan difficulties.

Our supply chain includes technology services (both hardware and software), marketing services, hospitality and entertainment, corporate travel and transportation, courier and postal services, facility services as well as labour and consultancy services.

### 3.2 OPERATIONS AND SUPPLY CHAIN

As a company in the heavily regulated financial services sector, the Group sees the risk of it causing or contributing to modern slavery, as largely being with its supply chain.

The Group has three leased office spaces, with headquarters located in Townsville, Queensland, a second office in Brisbane CBD and a third office on the Gold Coast. Finance One lends to borrowers in each State and Territory in Australia.

As of 30 June 2025, the Group had 222 employees, spread throughout its Queensland offices.

The Group engages many suppliers who provide general and specialist goods and services that are critical to supporting our offices and business processes. These range from technology, contracting staff overseas and logistics to cleaning, marketing and promotion.

Based on dollar value, the three largest categories of direct supplier spend by the Group are:

- Marketing and promotion;
- Technology and telecommunications; and
- Facilities.

Some of the Group's business-critical staff are based in Manila, Philippines and are contracted via an external hiring provider. The Group has contracted with this organisation since 2019 and maintains a close relationship and high level of oversight regarding employee remuneration, benefits and engagement.

The Group expects its suppliers and other people with whom it has business relationships to

respect human rights and will not knowingly or recklessly engage services where it could be complicit in human rights abuses.

## ■ MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

The Group has determined that the risk of modern slavery within its business operations and supply chain are relatively low.

The Group remains committed to ensuring that appropriate mechanisms are implemented to better detect and assess the potential exposure and hazards of modern slavery. It continuously seeks to understand the complexities and risks of modern slavery, and the various ways in which it presents itself in operations and supply networks.

### 4.1 SECTOR AND INDUSTRY RISK

The financial services sector in which the Group operates is heavily regulated and governed by, reports to, and shares data with the:

- Australian Securities and Investments Commission (ASIC)
- Australian Prudential Regulation Authority (APRA)
- Australian Transaction Reports and Analysis Centre (AUSTRAC)
- Australian Financial Complaints Authority (AFCA)
- Australian Taxation Office (ATO)

The Group's reporting ties with ASIC, AUSTRAC, and the ATO assist it to detect financial crimes often tied to human exploitation. Sharing data with these regulators, enables the Group to monitor for 'red flags', such as unusual transaction patterns, that may signal forced labour among suppliers or customers.

The Group is committed to eliminating the financial incentives that drive modern slavery.

### 4.2 EMPLOYEES AND OPERATIONS RISK

The Group's personnel recruiting and management operations, as well as its remuneration practices, are consistent with financial services industry practices across Australia and are competitive in order to compete for and retain talent.

Staff remuneration consists of both fixed and variable components, which are dependent on the attainment of corporate and financial objectives as well as the individual achieving a positive assessment against their own goals.

The Group is dedicated to creating a safe working environment in which employees are appreciated, valued, respected and treated fairly and equally in all aspects of their work. Our Group's Code of Conduct outlines the obligations and responsibilities that each employee has and should follow when dealing with other employees, our customers and other businesses/suppliers, including with regards to human rights, well-being and physical safety.

### 4.3 GEOGRAPHIC RISKS

The risks of modern slavery may be heightened in some of the Group's operations due to geographical location. The Group maintains a limited and concentrated supply chain with the

bulk of suppliers based within Australia. Accordingly, the Group's operations and supply chain do not present a significant geographic risk of modern slavery.

A small proportion of the Group's staff are on contract from an outside organisation which is headquartered in Manila, Philippines. The Global Slavery Index Report (GSI) found that the estimated prevalence of modern slavery in Philippines was 7.8 per 1,000 people, whilst the prevalence in Australia was 1.6 per 1,000 people. This indicates that the risk of modern slavery occurring in the Philippines is higher than in Australia. For this reason this supplier is continuously monitored to ensure they do not engage in modern slavery.

None of the Group's suppliers are situated in any of the ten countries whose governments have been accounted by the GSI as taking minimal action to address current subjugation and modern slavery.

#### **4.4 ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

The Group periodically reviews its supply chain and the potential for modern slavery in certain industries it does business with, such as hospitality, marketing, transportation, and building and maintenance services. These industries may be susceptible to poor labour standards and exploitation and are of higher risk of modern slavery.

For potential suppliers considered high risk businesses within the Group's supply chain, there is robust regular examination of their:

- organisational structure, including whether they are subject to the Act and have a modern slavery statement;
- workforce details;
- supply chain management; and
- employment conditions and workplace environment.

Over the Reporting Period, the Group has set out to improve its capability and the education of its decision-makers about modern slavery. The Group is committed to a continuous improvement approach, ensuring it remains equipped to assess and respond to modern slavery risks should they be identified in future periods

Prior to onboarding with the Group, all new employees undergo several background checks, including a National Police Check and an ASIC Bankruptcy and Disqualified Check. Once the required checks are satisfied, each new employee must read and acknowledge all applicable Group policies, including the Policies set out in Section 4.5 of this Statement.

The Group also conducts modern slavery training to ensure managers and senior staff who are involved with supplier procurement better understand how to identify, mitigate and report modern slavery risks.

#### **4.5 POLICIES**

The Group's policies and procedures promote and encourage good practices and behaviours and protect the human rights of its people, external stakeholders, consumers and suppliers.

These policies are applicable to our Board of Directors and all employees, officers, contractors, consultants and other persons that act on behalf of the Group. The following policies are particularly important to this process:

#### **4.5.1. Modern Slavery Policy**

The Group's Modern Slavery Policy outlines our zero-tolerance approach to modern slavery for all employees, contractors, and other stakeholders and outlines the potential risks of modern slavery in our operations and supply chains.

The implementation of the modern slavery policy also reinforces to key stakeholders, including suppliers, the Group's commitment to identifying and mitigating these risks. This policy is reviewed on an annual basis.

#### **4.5.2. Whistleblower Policy**

Employees, contractors, and consultants who report unethical or illegal behaviour in the workplace are encouraged and protected by the Group's Whistleblower Policy. Employees can utilise our informant channels to raise their interests/concerns (anonymously) and without fear of repercussions.

Under the Whistleblower Policy "Any conduct that poses a serious risk to the health and safety of other persons in the workplace; public health and safety; the financial system or to the environment" is considered as a disclosable matter. Any instance of modern slavery in our operations or supply network would count as an activity that poses a risk to public health and safety, and this policy enables the reporting of a potential occurrence of modern slavery.

#### **4.5.3. Anti-Money Laundering and Counter-Terrorism Financing Program**

By performing customer and investor due diligence, the Group aims to detect and prevent the financial system from being misused in criminal activities, including money laundering and terrorist financing, for the safety and security of our customers and society.

#### **4.5.4. Supply Chain Management**

Assessment of modern slavery risk forms is part of the assessment of potential supplier engagements. The Group requires potential suppliers to complete its standard Vendor Security Questionnaire and Modern Slavery Questionnaire. These Questionnaires include questions to assist the Group with due diligence to assess the risk of modern slavery in our supply chain and other accessible environmental, social and governance information related to them.

Whilst most of the Group's suppliers are based in Australia, some of its suppliers are based abroad. Where suppliers are located overseas, the Global Slavery Index is used as an assessment tool to help ensure only ethical organisations are engaged with.

## **■ ASSESSING THE EFFECTIVENESS OF OUR ACTIONS AND CONTINUOUS DEVELOPMENT**

The Group has a cross functional team which oversees its compliance with and the effectiveness of its modern slavery strategy. This team periodically reviews internal policies and training on modern slavery and ensures ongoing and new suppliers are assessed for modern slavery risks. It conducts internal audits, to ensure policies and training remain fit-for-purpose and are aligned with evolving risks.

The Group is committed to respecting human rights and will continue to review and enhance our existing policy framework. The Group is committed to continuous employee training particularly

for managers and senior staff involved in supplier procurement, to ensure awareness regarding modern slavery and its potential to exist in our supply chain.

The Group acknowledges that continuously and honestly evaluating the effectiveness of our current actions is an essential step to identify and prevent modern slavery in our operations and supply chain.

Over the next 12 months the Group intends to develop and implement a Supplier Code of Conduct which sets out expectations for third party suppliers to conduct their business in a manner consistent with the Group's commitment to addressing modern slavery.

## ■ APPROVAL

This statement was made pursuant to the reporting requirements under the *Modern Slavery Act 2018* (Cth) and constitutes the Group's modern slavery statement for the financial year ending 30 June 2025.

The Board of Directors of Investors Central approved this statement on behalf of the Group on 31 December 2025.



**JOSEPH MCSHANAG**

Chairman, Investors Central Limited  
31 December 2025



**JAMIE MCGEACHIE**

Managing Director, Investors Central Limited  
31 December 2025





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