



INVESTORS CENTRAL

# MODERN SLAVERY STATEMENT | 2024

## ■ IMPORTANT NOTICES

This Modern Slavery Statement is made in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**) by Investors Central Limited ACN 143 097 385 and covers the activities of the reporting entities and their related bodies corporate (collectively referred to as **Finance One Group**). The parent entity of Finance One Group is Investors Central Limited.

In this Group statement a reference to "Finance One", "we" and "our" is a reference to Finance One Group. This statement is for the period 1 July 2023 to 30 June 2024 (**Reporting Period**).

The related bodies corporate captured by this statement during this period were Fin One Pty Ltd ACN 139 719 903, Finance One Commercial Pty Ltd ACN 634 900 548, 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.

The statement is made on behalf of Finance One Group and has been prepared on the basis of consultation with each company – and their senior executives – covered by the statement.

## ■ INTRODUCTION

At Finance One, we recognise that human rights is an area of importance to our employees, shareholders, customers and the communities in which we do business. We also acknowledge our responsibility in seeking to safeguard human rights through ethical and sustainable business practices. Finance One 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 Group statement sets out the steps taken by Finance One during the Reporting Period to ensure we minimise the risks of modern slavery and human trafficking existing within our business and supply chain.

## ■ OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Founded in 2010, Finance One has taken a compassionate and flexible approach to lending to everyday Australians. We strive to find finance solutions for everyone. 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 Finance One's values of Customer Commitment, Accountability, Empowerment and Integrity.

  
**Customer  
Commitment**

  
**Accountability**

  
**Empowerment**

  
**Integrity**

Headquartered in Townsville, Queensland, we are a non-bank lender, which writes consumer and commercial loans. We also have a debt collection arm that purchases and collects debt.

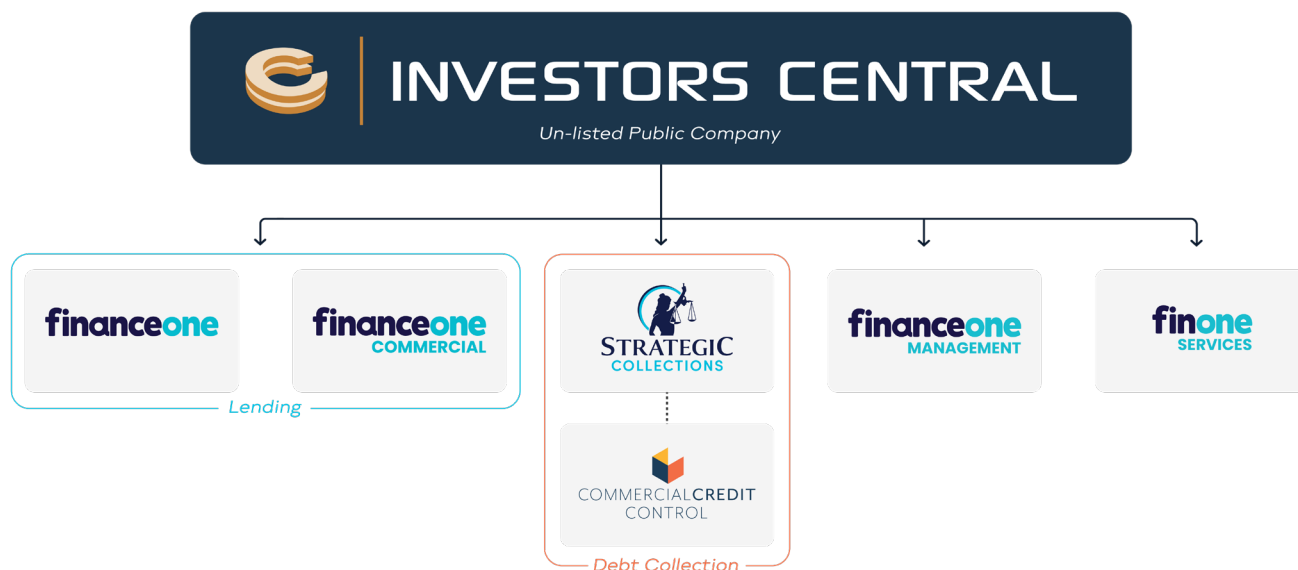
Our lending business model is predominantly based on servicing borrowers that fall outside traditional lenders' guidelines, providing more Australians with an opportunity to access finance to improve their quality of life.

We believe in fairness, genuine respect and real service, plus a firm but compassionate approach when working with clients to overcome any loan difficulties.

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

## STRUCTURE

The Finance One Group operates through a number of subsidiary companies including entities which hold Australian Credit Licences that enable us to conduct our core business activities.



## OPERATIONS AND SUPPLY CHAIN

As a company within the financial services industry, our risk to cause, contribute to, or be directly linked to modern slavery largely rests in our supply chain.

Finance One 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.

As of 30 June 2024, we had almost 200 employees, spread throughout all our Queensland offices.

Finance One 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 Finance One are:

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

Some business-critical staff are based in Manila, Philippines and are contracted via an external hiring provider. We have contracted with this organisation since 2019 and maintain a close relationship and high level of oversight regarding employee remuneration, benefits and engagement.

The Finance One 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 Finance One Group has determined that the risks of modern slavery within our business operations and supply chain to be relatively low.

Despite the overall low risks of modern slavery, we remain committed to ensuring that appropriate mechanisms are implemented to better detect and assess the potential exposure and hazards. We understand the complexities of modern slavery, and the various ways in which it can present itself in operations and supply networks.

### SECTOR AND INDUSTRY RISK

We believe that the highly regulated structure of the financial services industry in which the Finance One Group operates reduces the possibility of modern slavery. Finance One is governed by, and reportable to, the Australian Securities and Investments Commission ("ASIC") and the Australian Transaction Reports and Analysis Centre ("AUSTRAC").

Due to the financial services industry's obligations to comply with these and other standards, we believe it is less likely to be engaged in cases of modern slavery than other less regulated and higher risk businesses.

### EMPLOYEES AND OPERATIONS RISK

We believe that the risk of modern slavery in our activities to be low. The risk assessment undertaken considered personnel recruiting and management operations.

Our remuneration practices are designed to be consistent with financial services industry practices across Australia and are attractive 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 Finance One 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 Code of Conduct outlines the obligations and responsibilities that each Finance One employee has and should follow when dealing with other Finance One employees, our customers and other businesses/suppliers. Part of this includes our approach to human rights, well-being and physical safety.

### GEOGRAPHIC RISKS

We recognise that the risks of modern slavery may be heightened in some of the Finance One Group's operations due to geographical location. The Finance One Group maintains a limited and concentrated supply chain with the bulk of our suppliers based within Australia. As a result, we believe that our operations and supply chain do not constitute significant geographic risks of modern slavery.

We do acknowledge that a small proportion of our staff are on contract from an outside organisation and are headquartered in Manila, Philippines. The Global Slavery Index Report (GSI) 2023 Report 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 risks of modern slavery occurring in Philippines are significantly higher than those in Australia.

Because of the above, we consider this supplier to be of risk because of the location in which it operates and we therefore monitor this supplier and seek information from them to ensure they do not engage in modern slavery.

None of our suppliers are situated in any of the 10 countries whose governments have been accounted for the GSI as taking minimal action to address current subjugation and modern slavery.

## ■ ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Following a review of our supply chain, we have identified that there exists the potential for modern slavery in certain industries we interact with, namely hospitality, marketing services, transportation, and building and maintenance services. We believe that is inherent in the nature of these industries and they may be susceptible to poor labour standards and exploitation.

We have assessed the identified risk areas of our supply chain to better understand and respond to modern slavery risks. Where applicable, we have contacted identified high risk businesses within our supply chain. We have requested these businesses provide us with details 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, Finance One has set out to learn about and educate itself and its decision-makers about modern slavery. From this understanding we fostered an arrangement to relieve any present risks within our activities and supply network. We intend to demonstrate a continued commitment to assessing modern slavery risks and responding to them should they arise. We will document this progress through our yearly modern slavery statement.

## POLICIES

Finance One's policies and procedures promote and encourage good practices and behaviours and protect the human rights of our 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 Finance One Group. We have identified that the following policies are particularly important to this process:

### Modern Slavery Policy

Finance One'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 Finance One's operations and supply chains.

The implementation of a modern slavery policy will also reinforce to key stakeholders, including suppliers, that we are committed to identifying and mitigating these risks.

## **Whistleblower Policy**

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

Under our 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" are considered disclosable offences. 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 therefore, we believe this policy allows the appropriate stakeholders to feel confident and protected in reporting a potential occurrence of modern slavery.

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

By performing customer and investor due diligence, Finance One 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.

## **Supply Chain Management**

During the Reporting Period we began auditing our major suppliers, their approach to modern slavery and other accessible environmental, social and governance information related to them.

The Finance One Group subsequently undertook a risk assessment to understand any risks which could be present in our supply chain. Whilst we predominantly work with suppliers based in Australia, some suppliers are based abroad. Where suppliers are located overseas, we seek to include consideration of the Global Slavery Index in our assessment tool to help ensure we only engage with ethical organisations.

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

The Finance One Group has employees to oversee the effectiveness of its modern slavery strategy. Members of that team may undertake internal audits from time-to-time to ensure ongoing and new suppliers are assessed for modern slavery risks; communicate with suppliers about modern slavery and regularly review internal policies and training.

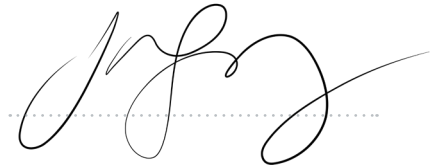
The Finance One Group acknowledges that continuously and honestly evaluating the effectiveness of our current actions is an essential step in preventing modern slavery in our operations and supply chain.

Over the next 12 months we intend to embed a commitment to respecting human rights in the existing policy framework. In particular, we intend to focus on training our staff – particularly managers and senior staff who are involved in procurement – to ensure awareness regarding modern slavery and its potential to exist in our supply chain.

## ■ APPROVAL

This statement was made pursuant to the reporting requirements under the *Modern Slavery Act 2018* (Cth) and constitutes the Finance One Group's modern slavery statement for the financial year ending 30 June 2024.

The Board of Investors Central approved this statement on behalf of Finance One Group  
12 December 2024



**JOSEPH MCSHANAG**

Chairman, Investors Central Limited  
12 December 2024



**JAMIE MCGEACHIE**

Managing Director, Investors Central Limited  
12 December 2024