

Modern Slavery Statement FY2020

Objective and scope

This Modern Slavery and Human Trafficking Statement (Statement) is made pursuant to the Modern Slavery Act 2018 by Mortgage Choice Limited (ABN 57 009 161 979) (Mortgage Choice) relating to the financial year 1 July 2019 to 30 June 2020 (FY2020). Mortgage Choice and its subsidiary FinChoice Pty Ltd (FinChoice) are subject to the requirements of the Australian Modern Slavery Act 2018 (Cth) and these requirements are incorporated in this Statement.

This Statement applies to Mortgage Choice and its subsidiary FinChoice Pty Ltd, referred to collectively hereafter as Mortgage Choice, Group', 'us' and 'we'.

Mortgage Choice is committed to achieving a high level of ethical behaviour and integrity in the conduct of its operations. We recognise that we have responsibilities to our employees, franchisees, customers and the broader community and aim to have a positive impact on society.

The consultation process included engagement with the common Company Secretary for both entities. The Boards of each reporting entity have approved this statement and further information about the approval of this statement is set out on page 6.

1. About our business

Mortgage Choice Limited is an ASX listed (MOC) Mortgage Broking firm offering expert assistance with home loans, car loans and insurance, commercial loans, home buildings and contents insurance, landlord insurance, equipment finance, business finance and mortgage protection insurance through a network of franchise businesses across Australia. Mortgage Choice assisted customers with obtaining A\$10 billion in home loans in FY20.

FinChoice provides expert financial advice and assistance with personal insurance, superannuation, investment, budgeting, debt management, retirement planning and estate planning through a network of franchise businesses across Australia. FinChoice has over A\$1 billion in funds under management on behalf of our clients.

We are headquartered in North Sydney, Australia with over 100 employees across 5 locations around Australia.

Risk of modern slavery practices

We take the risk of modern slavery seriously and support maintenance of human rights for all on a fundamental moral basis. All employees and directors are responsible for

knowing and following the ethical, legal and policy requirements that apply to their jobs and for reporting any suspected breaches of law or our code. Our executives and managers are accountable for creating and promoting a workplace environment in which compliance and ethical business conduct are expected and encouraged. The way we do business greatly mitigates the risk of modern slavery being present in our business. However, we do recognize that we have a responsibility to minimize the risk of modern slavery becoming present in our supply chains in a proactive manner. Accordingly, we have tailored our risk processes to ensure that we are focusing our efforts on those areas that present an elevated risk of exposure.

Service Providers

Mortgage Choice's supply chains include suppliers for the following goods and services provided in respect of:

- Recruitment,
- Travel,
- Marketing and Communication,
- Mail and Logistics,
- IT and Telecommunications,
- Cleaning,
- Catering and Hospitality
- Facilities Management,
- Business Process Outsourced administration.

We seek to engage with suppliers that have similar values and business ethics to ourselves to minimize risk. Mortgage Choice engages the support of business processing offshore suppliers and acknowledges the potential vulnerability of the employees of these suppliers to the risks of Modern Slavery. Mortgage Choice therefore engages in heightened due diligence including understanding the terms of the agreement between the supplier and employee as to salary rate, mandated break times and loading for overtime, public holidays and non working days. Mortgage Choice's due diligence also includes a physical premises inspection whilst the agreed supplier contract terms include payment of a premium office location fee by Mortgage Choice.

2. Actions taken by Mortgage Choice to address Modern Slavery risks - FY2020

In FY2020, Mortgage Choice established a Modern Slavery due diligence process for new supplier relationships. As part of this process, we took steps to ensure that new and renewed supplier contracts contain warranties and obligations relating to the prevention of Modern Slavery and human trafficking, where appropriate.

Due Diligence Processes

Mortgage Choice performs due diligence when considering obtaining goods or services from new suppliers, or reviewing its arrangements with existing suppliers. The organisation's due diligence and reviews include:

- Considering the geographic location of the supplier;
- Considering the activities to be performed or goods to be supplied by the supplier;
- Seeking feedback from franchisees

Where an elevated risk of Modern Slavery is identified, the organisation performs enhanced due diligence

Updates to Codes of Conduct

We updated our Codes of Conduct to bolster our commitment to addressing Modern Slavery risks in our business and driving accountability for ethical business practices across our organisation.

Introduction of Supplier Code of Conduct

We introduced a Supplier Code of Conduct that sets out the minimum expectations for our suppliers and third party labour providers related to ethical practices including addressing Modern Slavery risks in their business. This code was approved by the Board on 26 May 2020 and commenced on 1 June 2020.

Update to supply contract templates

Our template supply contracts were updated to include the requirement for suppliers to:

- Comply with Mortgage Choice's Supplier Code of Conduct
- Comply with all applicable anti-slavery and human trafficking laws
- Notify us of any actual or suspected breach of any Modern Slavery laws
- Provide warranties that they have complied with Modern Slavery laws

We established an expectation with our suppliers that they will engage with their suppliers on similar terms. We wish to work in partnership with our suppliers to address risks of Modern Slavery that exist.

Training

We have conducted targeted training for relevant staff in our business in procurement, recruitment, compliance, legal and risk teams to raise awareness of Modern Slavery risks and how they may arise in our business.

Whistleblower policy

Mortgage Choice developed a Whistleblower policy appropriate for the size and scale of the organisation. The Whistleblower policy includes the ability for suppliers and their employees to provide a report to Mortgage Choice and receive protections under the Whistleblower policy. This policy was approved by the Board on 20 November 2019 and commenced on 1 January 2020.

Remediation

Mortgage Choice is committed to reviewing reported concerns or incidents, and if substantiated, taking appropriate steps to address the issues raised.

We are also committed to maintaining the integrity of the reporting and investigation processes. All substantiated incidents of Modern Slavery will be formally documented, investigated and reported to the General Counsel & Company Secretary, and at least annually to Audit & Risk Committee.

3. COVID-19 impacts on Mortgage Choice

Mortgage Choice took steps to protect vulnerable workers in our global supply chain from the impacts of COVID-19. In particular, Mortgage Choice performed risk assessments on business process offshore providers and introduced operational guidelines to enable and support individuals to provide services remotely to ensure an ongoing safe working environment. This is regularly reviewed by senior management to ensure it remains appropriate.

4. Assessment of effectiveness

The effectiveness of mitigation actions taken will be generally assessed by:

- Concerns or complaints raised internally or externally are collated and escalated as required for executive team review
- Policies and procedures are subject to regular internal review
- Staff are given conduct training on appointment
- Regular monitoring of suppliers

All contracts are required to undergo legal review prior to execution. This review allows supplier's acceptance of template Modern Slavery provisions to be monitored and reported to the Chief Financial Officer who is ultimately responsible for risk management in the organisation.

The organisation also intends to audit supplier agreements entered into during the period to provide feedback to business units, enhancing modern slavery conversations with suppliers going forward.

5. Next Steps

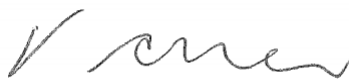
We are fully committed to the highest ethical standards and will continue to review the effectiveness of our policies, procedures and training to improve our ability to detect, mitigate and reduce the risk of Modern Slavery and human trafficking with our business and supply chain. For FY2021, we have identified the following key actions:

1. Further develop and roll out in-house training on Modern Slavery, along with webinar-based training sessions for our franchise businesses;
2. Review and strengthen contractual terms to build capacity in our supply chain to tackle Modern Slavery within their own businesses and supply chains;
3. Perform an internal audit of Supplier agreements to ensure impacts are being addressed
4. Publish this Modern Slavery Statement on the Mortgage Choice website

6. Authority

This statement was approved by the Board of Mortgage Choice Limited and FinChoice Pty Ltd on 25 March 2021 and will be reviewed and updated annually.

Signed



Vicki Allen
Chairman