



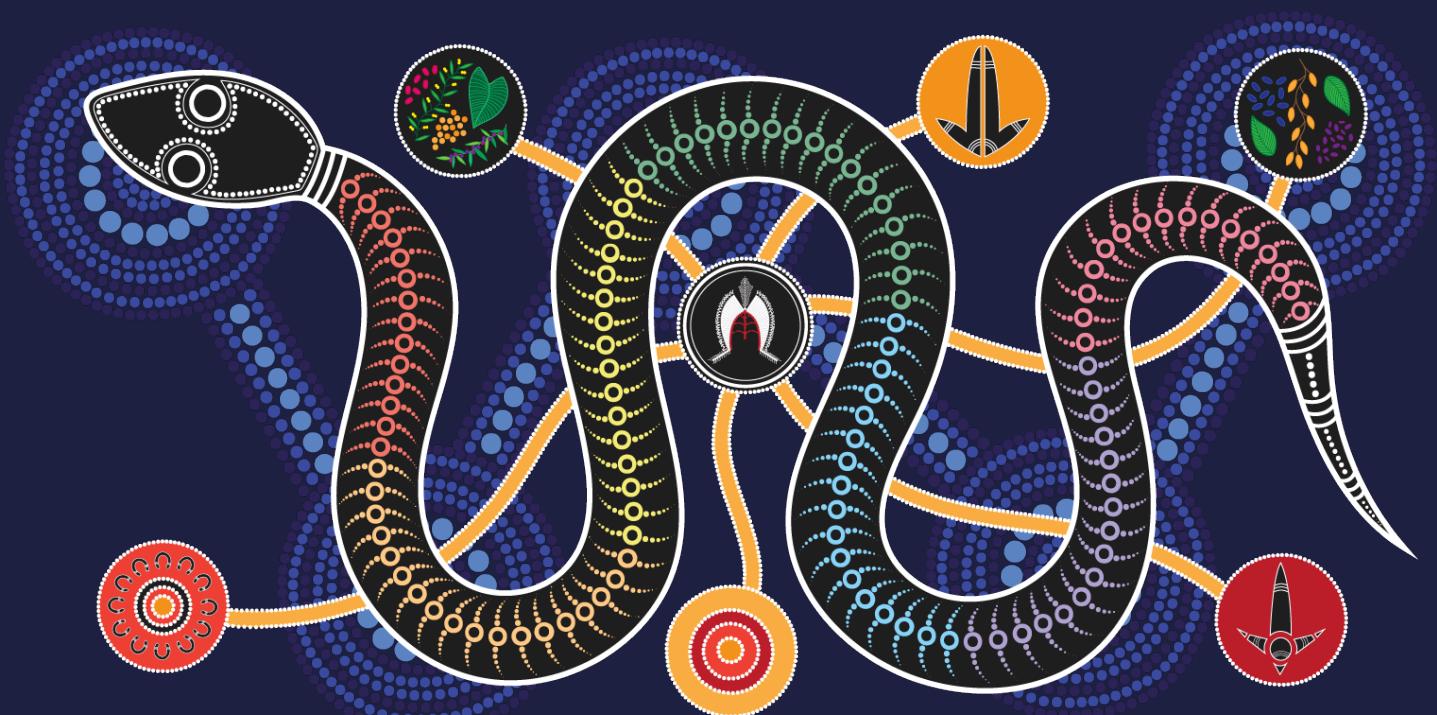
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# MODERN SLAVERY STATEMENT 2025

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PEXA Group Limited  
ABN 23 629 193 764





The PEXA Group acknowledges Aboriginal and Torres Strait Islander peoples as the traditional custodians of the lands on which we work, live and dream, we pay respects to elders past and present.

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We recognise that we have a role to play in creating space and place for Aboriginal and Torres Strait Islander voices in our business, and our impact. We continue to explore how we walk together, how we co-design with Aboriginal and Torres Strait Islander Peoples, to develop meaningful relationships, with mutual benefit. We will continue to embrace the spirit of reconciliation, as it is evolving in nature, toward an equitable future.

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# About this statement

This joint modern slavery statement (Statement) has been prepared in line with the requirements of the *Australian Modern Slavery Act 2018* (Cth) (Modern Slavery Act). While PEXA Group is not required to report under the *UK Modern Slavery Act (2015)*, this Statement also meets its disclosure requirements.

This Statement covers the reporting entities listed and PEXA Group Limited's operating subsidiaries and controlled entities in both Australia and the United Kingdom (UK):

- PEXA Group Limited ACN 629 193 764
- PEXA Australia Group Pty Ltd ACN 634 022 683
- PEXA Insights (Holdings) Pty Ltd ACN 647 085 818
- PEXA International Pty Ltd

This Statement does not cover non-controlled entities or non-operated joint venture operations.

This Statement sets out the actions taken by PEXA Group to identify, assess, and address modern slavery risks across its operations and supply chains for the reporting period 1 July 2024 to 30 June 2025. This Statement was approved by the Board of Directors of PEXA Group Limited (PEXA Group) on 19 December 2024 and has been signed by the Managing Director and Chief Executive Officer.

## PEXA Group's whistleblower mechanism

We are committed to creating and maintaining an open working environment where our workforce (including employees, contractors and contingent workers) and suppliers feels safe and secure to raise concerns without fear of retaliation or victimisation. We encourage those that may have concerns related to modern slavery in our operations or supply chain to make a report via our whistleblower mechanism.

Disclosures can be made anonymously and will be treated confidentially and securely through the following channel:

### Deloitte Whistleblower Service

1800 173 918

[australia.deloitte-halo.com/PEXA](http://australia.deloitte-halo.com/PEXA)

[whistleblower@deloitte.com.au](mailto:whistleblower@deloitte.com.au)

# Group Managing Director and CEO's message



## I am pleased to present PEXA Group's sixth Modern Slavery Statement.

At PEXA Group, our purpose is to connect people to place. Central to this purpose is our commitment to making a positive impact on our people, our customers and the communities in which we operate. This commitment extends to ensuring that human rights and ethical conduct remain at the core of how we do business — across our operations, our supply chain and our global partnerships.

FY25 has been a pivotal year for the Group. We continued to strengthen our Australian Exchange — an important piece of critical national infrastructure — while expanding our international operations in the UK and deepening our Environmental, Social and Governance (ESG) approach. As we grow our business and broaden our impact, we remain committed to embedding responsible and ethical practices throughout our operations and supply chains.

Over the past year we have made important progress against our three-year Modern Slavery Roadmap, developed in consultation with external experts and guided by our Audit and Risk Committee. We undertook a review of our procurement and third-party risk management processes, strengthened our due diligence and supplier assessment frameworks, and enhanced our training and awareness programs for employees and contractors. These initiatives are building a strong foundation for continuous improvement in the years ahead.

At PEXA, we believe that addressing modern slavery is not only a legal obligation but a moral imperative. While our direct operations remain low risk for modern slavery — given our skilled workforce and operations in Australia and the United Kingdom — we acknowledge that risks can arise indirectly through complex supply chains and third-party labour arrangements. We are therefore focused on deepening transparency across our supplier network, engaging with partners in higher-risk jurisdictions and ensuring our contractual and governance controls remain robust.

Looking ahead, we will continue to strengthen our modern slavery risk management framework by implementing the next phase of our Roadmap — including supply-chain risk mapping, enhanced key performance indicators and a centralised coordination mechanism to drive governance and accountability across the Group. Through these steps, we will further embed ethical and sustainable practices within our business and contribute to the collective effort to end modern slavery.

A handwritten signature in black ink, appearing to read "Russell Cohen".

Russell Cohen

CEO and Group Managing Director  
PEXA Group Limited

# About PEXA Group

## Structure and operations

PEXA Group is a digital property exchange platform and property insights solutions provider. Established from a 2008 Council of Australian Governments initiative, PEXA Group transitioned property lodgement and settlement from a paper-based process to a streamlined digital system. During the report period, PEXA Group handled 90% of all property transactions in Australia.<sup>1</sup> Headquartered in Melbourne, PEXA Group operates across Australia and the UK and was listed on the Australian Securities Exchange (ASX) in June 2021 under the code "PXA."

PEXA Group Limited is a public company, incorporated and domiciled in Australia. Alongside the reporting entities listed on page 2, PEXA Group includes various subsidiary entities primarily based in Australia and the UK. Each of these entities supports the Group's overall operations, contributing to our portfolio of brands and solutions.

## Our values

Our social license to operate depends on how well we serve our customers and stakeholders. That's why we adhere to a unified set of values across PEXA Group, driven by our purpose of 'connecting people to place'. Our values of 'better together' and 'innovate for good' help bring to life our commitment to responsible and ethical business practices and dedication to making a measurable difference including on modern slavery risk management.

PEXA Group's modern slavery response sits within our broader Environmental, Social and Governance (ESG) approach. Our ESG approach is underpinned by the UN Sustainable Development Goals. This includes Target 8.7, which seeks to eradicate forced labour, end modern slavery and human trafficking and eliminate all forms of child labour. PEXA Group is also a signatory to UN Global Compact (UNGC) and a participant of the UN Global Compact Network Australia (UNGCNA) with a commitment to working towards implementing the UNGC's Ten Principles on Human Rights, Labour, Environment and Anti-Corruption.



<sup>1</sup> See PEXA Group's Annual Report 2025

## Key business activities

PEXA Group's operations focus on three principal areas:

- **Exchange** – Operating an Electronic Lodgement Network (ELN) across New South Wales, Victoria, Western Australia, South Australia, Queensland, Tasmania, the Australian Capital Territory and the Northern Territory. This digital platform enables lawyers, conveyancers, and financial institutions to manage property settlements efficiently and securely, from set-up through to completion.
- **International** – Delivering digitalised property registration and settlement services in overseas Torrens Title jurisdictions, starting with England and Wales in the UK. The Group has now built a lodgement system (PEXAGo) and settlement system (PEXAPay) which it has connected to His Majesty's Land Registry (HMLR) and the Bank of England (BOE) respectively. PEXA has put the platform into production and its UK business has provided remortgage processing support to Hinckley & Rugby Building Society and Shawbrook Bank since late 2022.
- **Digital Solutions** – Providing a suite of property-related analytics and digital services to financial institutions, government agencies, property developers, and related professionals across Australia. These solutions, under brands like.id and Value Australia, offer demographic, economic, and property data insights to support decision-making across the property sector. Subsequent to 30 June 2025, a Strategic Review of the Digital Solutions business was announced on 11 August 2025 to assess its fit within the broader PEXA Group.

## Australian operations

In Australia, PEXA Group supports a diverse network of property market participants, including 345 state and local government agencies, over 160 financial institutions, more than 10,000 conveyancers and lawyers, and over 70 property developers. Through these partnerships, PEXA Group has facilitated property transactions for over a million consumers in the past year alone.

The Exchange has supporting over **24 million Australian property transactions** to date worth over **\$5 trillion**.

Each transaction is processed through a secure online workspace within the Electronic Lodgement Network, with automated lodgement with land titles offices and near real-time financial settlement at the Reserve Bank of Australia.

PEXA's robust API ecosystem, with more than 360 integrations, supports seamless interactions between practitioners, lenders, and government stakeholders. Its designation as critical national infrastructure by the Commonwealth's Department of Home Affairs assigns additional responsibilities to PEXA, the licensed operator of the Electronic Lodgement Network, to ensure the robustness of the platform on behalf of the broader community.

## International operations

PEXA Group's international expansion began with entry into the UK market, initially focusing on England and Wales. In November 2022, PEXA Group acquired Optima Legal Services Limited, a UK-based remortgage processing firm. Further supporting this strategy, PEXA Group acquired Smoove, a UK-based conveyancing technology provider, in December 2023.

PEXA Group's UK acquisitions have bolstered its offerings and market reach. Through Optima Legal, we provide remortgage conveyancing services on behalf of 7 of the 8 largest financial institutions in the UK, while Smoove supports both remortgage and sales and purchase based conveyancing activities to over 2,000 practitioners.

In June 2025, PEXA UK completed the UK's first digital property purchase. The transaction took place as part of the testing of PEXA's Sale & Purchase proposition ahead of its full launch and wider market roll out later this year. It marks an important milestone in PEXA's mission to streamline the home buying and selling journey. In July 2025, PEXA announced that NatWest signed a formal commitment to proceed with an implementation program with a view to future transactions on PEXA's UK platform. Subsequent to successful implementation, NatWest's remortgage transactions are expected to go live in the first half of calendar year 2026 with their sale and purchase transactions to follow by the end of calendar year 2026.

## About PEXA Group continued

### SNAPSHOT: PEXA GROUP'S FAMILY OF BRANDS AND SOLUTIONS



**PEXA** is the Group's flagship brand and is the banner under which we deliver our Exchange services in Australia and in the UK. In all our markets, it stands for the integrity, reliability and effectiveness with which we support millions of property transactions and provide associated services.

#### UK-specific solutions



**Optima Legal** (acquired in November 2022) is a high-volume remortgage processing firm headquartered in Leeds, England. It provides legal services in the UK remortgage market. Optima has direct relationships with seven of the country's top eight lenders, extending PEXA's connections to financial institutions and creating distribution channels in the UK.



**Smoove** (acquired in December 2023) is a UK-based conveyancing technology provider. Its primary solution is e-Conveyancer, a panel management service that brings together conveyancers, mortgage brokers, and their customers to offer a two-sided conveyancer marketplace. It also provides lender panel management services. The distribution capability afforded by Smoove contributes to our ambition to achieve UK sale and purchase transaction market share.

#### Australia-specific solutions



**Value Australia** (acquired in July 2022) is a next-generation property valuation platform which uses high performance Automated Valuation Models (AVMs) to provide a greater level of accuracy to improve the effectiveness of value-based land and property decisions. Value Australia is operated in conjunction with our partners, the University of New South Wales and Frontier/Sl, who collectively own 30% of the business.



.id (acquired in September 2022) is a leading supplier of data and tools to Government and Industry customers, enabling them to de-risk place-based decisions.



## About PEXA Group continued



### Our workforce

In the reporting year, PEXA Group employed approximately 900 individuals across Australia and the UK and engaged almost 300 consultants and contractors to supplement our workforce. During the reporting period, women represented 55% of our employees.<sup>1</sup> PEXA Group's workforce is structured into three main categories:

- **Direct employees:** These are permanent and fixed-term employees based in Australia and the UK (England and Wales only). They form the core of our workforce, handling key functions across our business.

- **Contractors:** These are specialised consultants to provide expertise in areas requiring additional support or project-based work. These consultants are generally based in Australia and the UK.
- **Consultants:** These are skilled professionals that provide services through established partnerships with global technology professional services firms. This workforce is primarily located in Manila, Philippines, and various locations in India. Consultants support a range of operational functions and are managed by the professional services firms.

### Composition and location of our global workforce

	Australia	India	Philippines	United Kingdom	Total
Permanent	500			399	899
Maximum terms contracts	25			8	33
Consultant	49	105	60	47	261
Contractor	13			24	37
<b>Total</b>	<b>587</b>	<b>105</b>	<b>60</b>	<b>478</b>	<b>1,230</b>

<sup>1</sup> Group gender balance reporting for FY25 includes PEXA AU and UK, and Optima Legal employees.

## Supply chain

**Total spend: \$86.95M**

**Total number of suppliers: 496 suppliers**

PEXA Group's supply chain is primarily focused on the procurement of information technology and professional services, which together account for 77% of our total spend. It also includes the procurement of corporate services and facilities management. Since the last reporting period we have reduced our supplier numbers and, allowing for greater oversight of our supply chain.

PEXA Group's key supplier base remains stable; supporting our operational needs. We have consolidated a small number of our offices, reducing our exposure to the higher risk category of cleaning services associated with this spend. We have also reviewed our travel management solution, which will change for PEXA's next statement period.

We acknowledge that sourcing from certain countries or regions may increase the risk of modern slavery, and that more work is needed to map the location of our Tier 1 suppliers and beyond. A key focus of enhancing our modern slavery due diligence and broader procurement efforts over the coming year will be to gain a clearer understanding of our suppliers' locations and where they source from. Two of our professional services providers are based in countries reported to be higher risk of modern slavery (Philippines and India) and we manage these relationships in line with our Third Party Risk Management Framework (see page 14), which included site visits.

## Spend by category

Advertising Facilities Management, \$1.85M

Facilities Management, \$3.87M

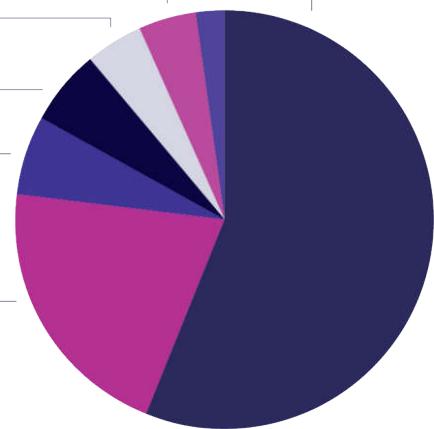
Recruitment, \$3.74M

Corporate Services, \$5.19M

Insurance, \$5.30M

Professional Services, \$18.02M

Technology, \$48.62M



# Operations and supply chain

## Relationship to modern slavery risks

The [UN Guiding Principles on Business and Human Rights](#) (UNGPs) are the global standard on preventing and addressing human rights harms by business. In line with the UNGPs and the Australian Government's [Guidance for Reporting Entities](#), PEXA Group understands that we may be involved in modern slavery if we potentially cause, contribute to, or are directly linked to modern slavery through our operations, supply chain or business

relationships – otherwise known as the “continuum of involvement”. Having a clear understanding of our potential involvement in modern slavery practices, enables us to better identify the appropriate actions to take when responding to modern slavery related concerns or incidents.

The following table outlines our understanding of the continuum of involvement and provides hypothetical examples of how a technology company like PEXA Group may be involved in modern slavery related practices.

## Modern slavery risks

Level of involvement	Definition	Hypothetical example of potential involvement in modern slavery
Cause	A company may cause modern slavery if its actions or omissions directly result in modern slavery practices occurring.	A technology company may cause modern slavery if it intentionally exploits its own workers, for example, by forcing or coercing them to work against their will.
Contribute	A company may contribute to modern slavery if its actions, or omissions, have created circumstances that incentivised or facilitated another company to engage in modern slavery practices. This could include situations where a company, based on credible allegations, had reason to believe that modern slavery practices were occurring within a business partner but failed to take action to address the issue.	A technology company may contribute to modern slavery if it was aware of credible allegations of exploitative practices taking place at a data centre provider but did not take action to address the issue.
Directly linked	A company may be directly linked to modern slavery if an entity with which it has a business relationship engages in modern slavery practices and the practices are directly linked to the company's products, services or operations.	A technology company may be directly linked to modern slavery practices if it purchases Information and Communication Technology equipment manufactured with forced labour.

## Operations

PEXA Group is a technology company with a workforce primarily made up of skilled or semi-skilled professionals. This includes roles ranging from technical experts to administrative support staff. Most of our workforce are based in Australia and the UK, where regulatory protections and employment standards are considered to be strong and modern slavery risks are generally considered low. We have consultants located in countries reported to be of higher modern slavery risk<sup>1</sup>, including the Philippines and India. However, these workers are highly skilled and are engaged through two established global firms that report having their own human rights commitments and risk management processes related to modern slavery. Additionally, these firms report under the Australian and UK Modern Slavery Acts.

Given the nature and location of our operations and the controls we have in place, we have assessed the risk of modern slavery within our operations as low. However, we acknowledge that no country, including Australia and the UK, is immune to modern slavery and we will continue to assess and monitor any changes and potential risks within our workforce and broader operations.

## Supply chain

PEXA Group recognises that certain products and services, particularly those involving vulnerable workers, complex supply chains, or sourced from regions with weaker labour protections and limited rule of law, may be more susceptible to modern slavery risks. The following table provides an overview of goods and services we procure that we have assessed are potentially at higher risk of modern slavery.

### Goods and services potentially more at risk of exposure to modern slavery

Goods and services	Modern slavery risk factors
<b>Technology services</b> (e.g. technology development and support)	<ul style="list-style-type: none"> <li>Services may be provided in regions with weaker labour protections and/or reported higher risk of modern slavery.</li> <li>Services providers may recruit temporary and/or migrant workers.</li> <li>Potential lack of visibility into working conditions and recruitment practices.</li> </ul>
<b>Technology equipment</b> (e.g. Software as a Service, Information and Communication Technology and system hardware)	<ul style="list-style-type: none"> <li>Manufacturing and/or raw material extraction may occur in regions with weaker labour protections and/or reported higher risk of modern slavery.</li> <li>Equipment may be produced by low-skilled, low-paid, temporary and/or migrant workers.</li> <li>Presence of complex, multi-tiered supply chains that limit visibility and oversight throughout the supply chain.</li> </ul>
<b>Facilities management</b> (e.g. cleaning services)	<ul style="list-style-type: none"> <li>Services may include the use of vulnerable workers including temporary, migrant, and low-skilled workers.</li> <li>Service providers may engage labour hire firms and/or sub-contracting.</li> </ul>
<b>Travel</b> (e.g. flights and accommodation)	<ul style="list-style-type: none"> <li>Businesses may rely on low-skilled, low-paid, temporary and/or migrant workers.</li> <li>Businesses may engage labour hire firms and/or sub-contracting.</li> <li>Potential use of hotels and airlines by third parties to facilitate human trafficking.</li> </ul>

<sup>1</sup> Walk Free. 2023 Global Slavery Index.

# Actions to assess and address risk

## Governance and policies

PEXA Group is committed to identifying and addressing risks of modern slavery in our operations and supply chain. We understand the importance of a strong governance approach that allows for clear accountability and responsibility for managing these risks effectively. The following diagram provides an overview of PEXA Group's governance structure for modern slavery risk management.

### PEXA Group's modern slavery risk management governance structure



Following the review of our modern slavery risk management approach related to our procurement activities (see page 15), we have identified that there is an opportunity to strengthen our internal coordination on modern slavery. In the coming year, we will look to continually improve our governance processes to manage and review modern slavery.

PEXA Group has several policies that set out our approach to assessing and addressing modern slavery risks. In addition, PEXA Group has a range of policies that support a broader commitment to responsible business conduct, for example, policies related to [diversity, equity and inclusion](#) and [anti-bribery and corruption](#).

## Policies for assessing and addressing modern slavery risk

Policy	Purpose and relevance to our modern slavery response	How we communicate this policy
<a href="#">PEXA Group Responsible Sourcing Policy</a>	Sets out PEXA Group's requirements for suppliers in relation to human rights and labour rights. Includes requirements that suppliers do not use forced labour, child labour, bonded or involuntary labour; and ensure that employment is freely chosen; that all workers have written contracts, wages are paid appropriately, and working hours are not excessive.	<p>The Responsible Sourcing Policy is publicly available on our website and on our internal intranet.</p> <p>The PEXA Group has a training module on <i>Combatting Modern Slavery</i> that all Australian employees complete each year.</p> <p>As part of our Third Party Risk Assessment Questionnaire (see page 17), tier 0,1, and 2 suppliers are required to confirm whether they comply with all Australian Modern Slavery legislation.</p>
Procurement Policy (internal only)	Sets out PEXA Group's requirements for its directors, officers, employees, contractors and subsidiaries in relation to the procurement process. Includes a requirement to conduct a risk assessment for all new suppliers.	The Procurement Policy is available on our internal intranet.
<a href="#">Code of Conduct and Ethics Policy</a>	Sets out PEXA Group's requirements for its directors, officers, employees, interns, all contractors, service providers of PEXA Group and its subsidiaries in relation to standards of behaviour that are expected to guide decision making. This includes aligning with PEXA Group's core values, including "hav[ing] a positive impact on Our People, communities and the environment". It also includes information about PEXA Group's whistleblower mechanism.	The Code of Conduct and Ethics Policy is available on the company website and on the company intranet.
Third Party Management Policy (internal only)	Sets out PEXA Group's requirements for PEXA Group employees in relation to identifying and managing the various risks that are presented by third party relationships. Includes expectations that initial risk assessments should be conducted for all third parties to segment them into 'low', 'medium' or 'high' risk profiles. The risk profile should then inform the level of due diligence, contract requirements and monitoring. The Third Party Risk Management Framework is supported by a risk assessment questionnaire which includes a question related to modern slavery.	The Third Party Risk Management Framework is available on the internal intranet.
<a href="#">Whistleblower Policy</a>	<p>Sets out PEXA Groups requirements in relation to whistleblowers, including PEXA Group's approach to disclosures, who can make disclosures, who can receive disclosures, how disclosures can be made, protections afforded to whistleblowers, and information about the investigation process. Also sets out details of external and internal reporting channels.</p> <p>The Whistleblower mechanism can receive disclosures related to modern slavery. Disclosable matters may be made in relation to a range of concerns including: an illegal act, miscarriage of justice or breach of any law, regulation or code of conduct, policy or procedure applying to PEXA Group; a serious breach of a PEXA Group Policy including the Code of Conduct; or conduct involving substantial risk to health or safety.</p>	The Whistleblower Policy is publicly available on our website and internal intranet.

## Actions to assess and address risk continued

### How PEXA Group assesses and addresses modern slavery risks in our operations

Our workforce consists of skilled and semi-skilled professionals across various technology and corporate functions. We have robust controls in place to ensure we comply with labour laws in both Australia and the UK. We have contracts in place for all our employees and take a range of steps to ensure our employees are paid fairly and in line with industry standards. For example, we conduct annual pay reviews to ensure fair and competitive compensation. The annual pay review is managed by the General Manager Performance and Reward, approved by the Executive Committee and CEO, and reported to the Board. We also benchmark all roles to market standards prior to advertising and proactively monitor for any potential pay discrepancies, including gender-related disparities. In the UK, our business, Optima Legal, is an accredited Living Wage Employer by the Living Wage Foundation. A small number of employees, such as those in our Customer Operations Team, are covered by an industry award.

PEXA Group's contractors and consultants are managed through a centralised procurement process. We conduct background checks on our consultants and our professional services providers are subject to our Third-Party Risk Management Framework. Our long standing relationships with these providers allow us to engage with these service providers if any concerns were to arise.

Alongside the controls ensuring our compliance with relevant labour laws, we have a comprehensive diversity, equity and inclusion program. This program includes clear commitments, policies, training and procedures aimed at fostering a respectful, safe and inclusive workplace.

### How PEXA Group assesses and addresses modern slavery risks in our supply chain

PEXA Group is committed to working with suppliers who align with our values and share our commitment to assessing and addressing modern slavery risks. As part of our Third Party Management Policy, all new suppliers undergo a tiering assessment to determine their risk profile. Suppliers tiered 0, 1 and 2 are required to complete a Third Party Risk Assessment Questionnaire which includes a specific question related to modern slavery. During the reporting period, more than 40 suppliers completed the Third Party Risk Assessment Questionnaire.

Additionally, PEXA Group has integrated modern slavery clauses into key supplier contract templates. This includes contracts with suppliers in our highest spend categories. We recognise that our highest spend categories may not necessarily be the categories which have the greatest modern slavery risk. As we continue to evolve our modern slavery risk management approach we will look to broaden the use of modern slavery contract clauses across additional procurement categories. The contract clause requires suppliers to adhere to any relevant modern slavery legislation.

In August 2024 we commenced a gap analysis of our procurement processes, to identify key areas for improving our supplier due diligence approach in relation to modern slavery risk management. The outcomes of this review are included in the case study below.

## Case study

### Review of our approach to modern slavery in our procurement processes

PEXA Group engaged a specialised business and human rights advisory firm to review our approach to assessing and managing modern slavery risks in our supply chain and assist us in developing a roadmap to inform our modern slavery risk management approach.

This review was conducted in August 2024. The aim of the review was to identify key opportunities for improvement and provide recommendations to strengthen our practices in line with the expectations under the Modern Slavery Act and the UNGPs. The review included consideration of key elements of the UNGPs including our modern slavery related policy commitments, due diligence processes and approach to grievance mechanisms. While the focus of the gap analysis was on supply chain risk management, the recommendations provided will also help strengthen our broader modern slavery risk management approach including related to our operations.

The review provided several recommendations to strengthen how we identify and manage modern slavery risks within our procurement processes, such as:

- Conducting a supply chain modern slavery risk mapping exercise to refresh key areas of modern slavery risk in our supply chain,
- Strengthening our supplier risk management approach to improve minimum screening processes and prioritise further assessments for high-risk suppliers for modern slavery,
- Enhancing and aligning our modern-slavery related policy commitments related to suppliers,
- Building internal and supplier knowledge and capacity on modern slavery,
- Establishing an internal mechanism to coordinate and drive PEXA Group's modern slavery risk management approach across the business, and
- Ensuring PEXA Group's whistleblower mechanism aligns with the UNGPs' effectiveness criteria.<sup>1</sup>

As part of this review, we developed a three-stage roadmap to prioritise actions to address the identified areas of improvement over time, aiming to align our efforts with the areas of most significant modern slavery risk in accordance with the UNGPs. Our key actions for the coming reporting period are outlined on page 19.

<sup>1</sup> The effectiveness criteria is referenced in the Australian Government's Guidance for Reporting Entities and includes that grievance mechanisms should be: legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue.

## Actions to assess and address risk continued



### Training and capacity building

We recognise that modern slavery risks can arise in various situations, and it is important that our employees and contractors are aware of these risks and how to identify and report potential modern slavery red flags. In 2023, PEXA Group introduced a mandatory online modern slavery training module for Australian and UK-based employees and contractors. The training includes an introduction to modern slavery, its impacts on people and strategies to identify and address modern slavery.

All Australian employees and ongoing contractors have to conduct an annual refresher of the modern slavery training module, which includes a short quiz. This refresher, integrated with the main e-learning module, helps to ensure employees stay informed and reinforces key aspects of modern slavery covered in the initial training. A similar Modern Slavery e-learning module is also conducted for PEXA Group UK employees, upon induction and annually thereafter.

### Stakeholder engagement

PEXA Group seeks to contribute to the development of shared understanding and knowledge regarding modern slavery. As a participant in the UNGC and in the Australian Local Network, we actively engage within the [UNGCNA's Modern Slavery Community of Practice](#) (MSCoP). The MSCoP provides a platform for Australian business to discuss challenges and opportunities related to modern slavery risk management. Our engagement in the MSCoP allows us to learn from other organisations, gain insights into best practice examples and strengthen our capacity to address modern slavery effectively.

Our UNGC participant information, along with our 2025 Letter of Commitment and Communication on Progress to the UNGC's Ten Principles is [publicly available](#). Additionally, PEXA Group takes part in the UNGCNA annual Australian Dialogue on Business and Human Rights, where we engage in discussions that promote awareness and understanding of human rights issues, including modern slavery. Through these initiatives, we seek to strengthen our knowledge and build capacity, not only within PEXA Group but also across our industry and supply chain.

# Grievance mechanisms and remediation

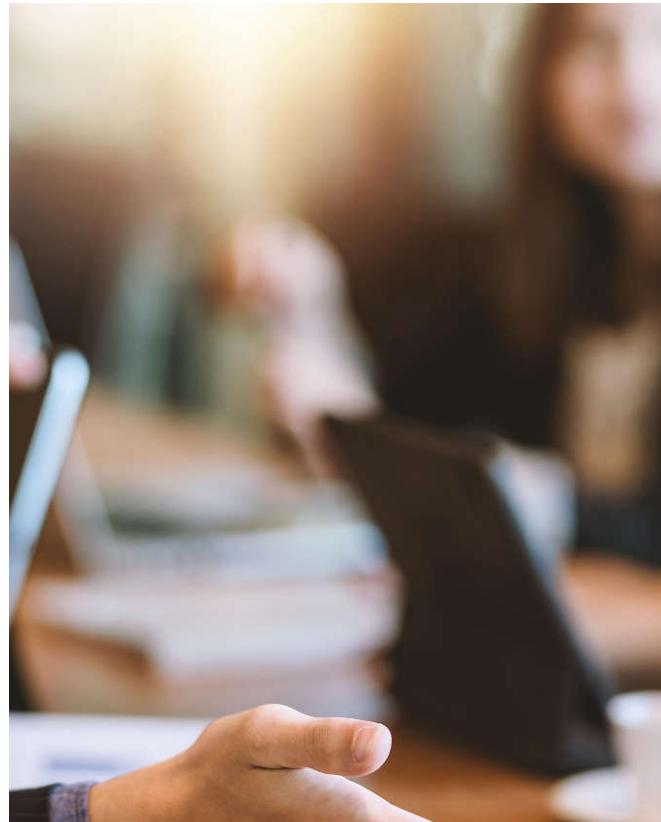
PEXA Group strives to ensure that everyone feels safe and secure in raising concerns without fear of retaliation or victimisation.

Our Whistleblower Policy provides a framework for reporting concerns about misconduct, including related to modern slavery, and outlines how these concerns will be handled and investigated. Our Whistleblower mechanism is accessible to PEXA Group employees, contractors, directors, service providers (which includes contingent workers) and suppliers. Additionally, former employees, as well as their spouses, relatives, or dependants, can also raise concerns under this policy.

All reports submitted through the whistleblower mechanism will be treated seriously and prioritised. They can be made anonymously and will be handled confidentially and securely, with each report assessed and documented appropriately. In addition to our Whistleblower mechanism, we also have internal channels in which

employees can raise concerns. We also take a range of steps to promote a 'speak up' culture within our employees.

To date, we have not identified any cases or concerns related to modern slavery within our operations or supply chain, including through our Whistleblower mechanism. However, we recognise that the absence of reported cases does not necessarily mean that risks or instances of modern slavery do not exist. The review of our approach to modern slavery within our procurement processes (see page 15) identified opportunities to further strengthen our Whistleblower mechanism in relation to modern slavery and enhance awareness, particularly among suppliers and their workers. Over the coming year, we will explore ways to improve both the visibility and effectiveness of our whistleblower mechanism for raising modern slavery concerns.



# Assessing the effectiveness of our approach

PEXA Group is committed to strengthening the effectiveness of our modern slavery risk management approach and finding opportunities to improve our response. During the reporting period, we continued to track our performance through the following ways:

- We monitor the number of suppliers who complete our Third-Party Risk Assessment Questionnaire. This helps us to understand where potential risks may exist, including in relation to modern slavery.
- We monitor the number of employees and contractors that complete the modern slavery training. This helps us to assess the level of modern slavery awareness among our employees and contractor workforce and their ability to identify modern slavery risks.

The review of our approach to modern slavery in our procurement processes (see page 15) has also been a key activity to help us assess the effectiveness of our approach and understand where we can strengthen it further. Moving forward, PEXA Group plans to build on the outcomes of this review by developing a set of key performance indicators (KPIs) to track the effectiveness of our efforts moving forward. These KPIs will complement our existing measures and provide a framework for ongoing evaluation and enhancement of our approach to modern slavery.



# Next steps

As part of our ongoing commitment to improving how we assess and address modern slavery, PEXA Group has developed a three-stage roadmap to guide our future efforts. We will continue to focus on strengthening our internal coordination on modern slavery and evolving our processes to identify and address modern slavery risks in our supply chain. Key activities for the coming year will include:

- Conducting a supply chain risk mapping to review key areas of modern slavery risk and support the prioritisation of actions to address these risks.
- Enhancing the modern slavery-related questions in our Third Party Risk Management Questionnaire and prioritising higher-risk suppliers for modern slavery for further assessment.
- Establishing an internal mechanism to coordinate and drive our modern slavery risk management approach.
- Developing a set of KPIs to track the effectiveness of our modern slavery risk management approach.
- Reviewing modern slavery clauses and integrating updated clauses into contract renewals with key supplier contracts to ensure they reflect our commitment to addressing modern slavery risks effectively.



# Consultation process

PEXA Group Chief Financial Officer is responsible for preparing this Statement and approved this Statement prior to submission to the Board of PEXA Group Limited. The Statement was reviewed and approved by PEXA Group Board signed by the Group Managing Director and Chief Executive Officer.

This Statement was developed in consultation with the reporting entities and owned or controlled entities covered by the Statement. This included consultation with the Directors represent the reporting entities and representatives from PEXA Group's management team with responsibility for the operations of the reporting entities and owned or controlled entities.

# Disclosure table

Australian Modern Slavery Act 2018 mandatory reporting criteria	UK Modern Slavery Act recommended reporting criteria	Where in this Statement we address this criterion
Identify the reporting entity		About this Statement (page 2)
Describe the structure, operations and supply chains of the reporting entity	Organisation's structure, its business and its supply chains.	About PEXA Group (page 4)
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	Parts of its business and supply chains where there is a risk of slavery and human trafficking taking place and the steps it has taken to assess and manage that risk.	Modern Slavery Risks in PEXA Group's Operations and Supply Chain (page 10)
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	<p>Policies in relation to slavery and human trafficking.</p> <p>Due diligence processes in relation to slavery and human trafficking in its business and supply chains.</p> <p>Training on slavery and human trafficking available to staff.</p>	PEXA Group's Actions to Assess and Address Modern Slavery Risks (page 12)
Describe how the reporting entity assesses the effectiveness of such actions	Effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Assessing the Effectiveness of PEXA Group's Approach (page 18)
Describe the process of consultation with any entities that the reporting entity owns or controls and in the case of a reporting entity covered by a statement under section 14—the entity giving the statement		Consultation Process (page 20)

