



Modern Slavery Policy
Francom

Version 2.0

Date: 12 March 2025

Version Number	Modified By	Modifications Made	Date Modified	Status
1	MH	Policy Created	16.01.25	Final
2	CE	Policy date and formatting	12.03.25	Final

OPERATIVE PROVISIONS

1 Modern Slavery Statement

Francom Group and its subsidiaries oppose modern slavery in all forms. This statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth) and sets out the Group's zero tolerance policy towards all forms of modern slavery. This statement furthermore outlines the Group's approach to alleviating the risk of modern slavery occurring within our supply chain. Finally, the statement will outline how we assess the effectiveness of the actions that we have taken to prevent the risks of modern slavery, and our plan for continual improvement in preventing any future risks of modern slavery occurring within our supply chain.

2 Supply Chain

The Group purchases debts from utility providers, telecommunications providers, the buy now pay later industry, and the banking and finance sector. These supply chains are based in Australia and New Zealand. The Group also collects debts on a contingent basis on behalf of clients. The Group sources the balance of its operational purchases predominantly within Queensland. The register of our suppliers and contractors is maintained, reviewed, and updated frequently.

3 Risk Assessment

The Group is committed to risk identification and management. The Group currently has risk identification and management processes that are outlined in our Risk Management Policy & Procedure. The Group maintains a Risk Register and Issues Register; these registers are regularly reviewed by the various departments across the Group.

One of the potential human rights risks facing the Group is the existence of modern slavery within our supply chain. We have a broad supply chain, with our suppliers and contractors providing a number of different services. Modern slavery has the potential to exist in our supply chain in the following circumstances:

- (a) Forced labor.
- (b) Child labor.
- (c) Debt bondage.
- (d) Human trafficking.
- (e) Wage theft; or
- (f) Discriminatory employment practices.

The Group's values are integral to the way we operate our business. Our commitment to human rights is supported by our policies and procedures that identify, assess, and mitigate the risks of human rights, conduct risks, and modern slavery issues. These policies include:

- (a) Code of Conduct.
- (b) Environmental Policy.
- (c) Remuneration Policy.

- (d) Workplace Health and Safety Policy.
- (e) Risk Management Policy & Procedure.
- (f) Recruitment Selection & Equal Opportunity Employment Policy.
- (g) Anti-Money Laundering and Counter-Terrorism Financing Policy; and
- (h) Whistleblower Policy.

4 Due Diligence and Remediation

- (a) We are in regular contact with our clients, suppliers, and contractors. This involves monthly governance meetings with our suppliers to discuss any risk and compliance issues that are relevant to the Group's operations. The Group has also consulted with external organisations on how we can continue to improve and effectively operate as a business. This involved an uplift to our policies and procedures and a comprehensive review of our business functions. In 2021 we also engaged an external law firm to conduct a comprehensive regulatory review.
- (b) Our reputation is extremely important to us. This is why the Group undertakes due diligence when considering new suppliers, clients, or contractors in accordance with our Procurement and Vendor Management Policy. We have also developed a Supplier Code of Conduct. This document states that our suppliers are required to comply with our Code of Conduct, policies and procedures, workplace health and safety, environmental legislation, and modern slavery legislation.
- (c) The Group also have safeguards in place to protect our employees who anonymously report suspected or actual illegal activity by another Group employee. Our Whistleblower Policy is available on our Intranet, and our Risk, Compliance and People and Culture Departments are readily available to discuss any issues or scenarios that may be captured under this policy.

5 Effectiveness of actions taken to assess

- (a) During our first reporting period, the Group's focus was to increase awareness of modern slavery risks within our supply chain. Therefore, at this early stage we are unable to determine if the processes that we have implemented will be adequate in terms of addressing these risks. However, we will continue to develop frameworks for assessing modern slavery risks within the Group's supply chain. These frameworks include but are not limited to:
 - (i) Reviewing our Risk and Issues registers to determine if any modern slavery risks/issues have been identified and reported by the Group; and
 - (ii) Reviewing responses from our supply chain to determine if our vendors and suppliers have measures in place to combat modern slavery risks.

6 Continuous Improvement

The Group will review and enhance its approach to modern slavery risks within our supply chain in the next 12 months by:

- (a) Continuing to assess new suppliers through the onboarding process and monitoring the contracts of existing suppliers.
- (b) Continuing to maintain and review our register of suppliers.

- (c) Conducting internal audits across various departments to ensure that we are acting in an ethical and efficient manner.
- (d) Reviewing and updating all other policies, work instructions and training modules.
- (e) Engaging with our suppliers around their compliance with Human Rights and Modern Slavery legislation.
- (f) Reviewing our Risk and Issues registers to determine if any modern slavery risks/issues have been identified and reported by the Group; and
- (g) Reviewing responses from our supply chain to determine if our vendors have measures in place to combat modern slavery risks.
- (h) This Modern Slavery Statement will be reviewed, updated, and published on an annual basis.

7 Review of this Policy

This Policy shall be reviewed annually to ensure compliance with relevant laws and organisational needs by the Operations Manager and CEO and at any other time considered appropriate by the Managing Director or the CEO.

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