



Modern Slavery Policy

Francom

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Version Number	Modified By	Modifications Made	Date Modified	Status
1.0	Operations	Policy Created	16.01.25	Final
2.0	Operations	Policy date and formatting	12.03.25	Final
3.0	Operations	Policy Update	23.07.25	Final
4.0	Governance & CRO	Annual Update	24.07.26	Final

OPERATIVE PROVISIONS

1 Modern Slavery Policy Statement

- 1.1** 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

- 2.1** 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 assesses the effectiveness of its modern slavery framework through supplier reviews, risk assessments, internal audits, training completion monitoring, incident reporting and review of supplier attestations.

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 labour.
- b) Child labour.
- 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

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.

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 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.

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 Actions Taken to Assess and Address Modern Slavery Risks

The Group has implemented a range of measures to identify, assess, manage and monitor modern slavery risks within its operations and supply chains. These measures form part of the Group's broader governance, risk management and compliance framework.

The Group's key actions include:

5.2 Training and Awareness

The Group promotes awareness of modern slavery risks through employee training, guidance and compliance communications, supporting the identification and escalation of potential concerns.

5.3 Supplier Due Diligence

Modern slavery considerations are incorporated into supplier onboarding, procurement and vendor management processes. Suppliers are expected to operate ethically and comply with relevant laws and standards relating to human rights and modern slavery.

5.4 Legal Review of New Vendors

New vendor engagements may be subject to legal and governance review to ensure appropriate consideration of compliance, ethical conduct and modern slavery obligations.

5.5 Escalation and Reporting

Employees, contractors and stakeholders are encouraged to promptly report any suspected or actual modern slavery concerns through established reporting channels, including the Group's Whistleblower Program where appropriate.

5.6 Investigation and Remediation

Suspected or actual issues are assessed and investigated as required. Appropriate corrective actions, remediation measures and enhanced monitoring may be implemented, with material matters escalated to the CEO, CRO and/or CLO.

5.7 Risk and Governance Oversight

Modern slavery risks and incidents are monitored through the Group's risk, compliance, governance and audit functions, with significant matters reported to Executive Management, the Risk and Audit Committee and/or the Board where appropriate.

5.8 Monitoring Effectiveness

The Group assesses the effectiveness of its framework through supplier reviews, risk assessments, internal audits, training monitoring, incident reporting, supplier attestations and review of risk and issue management records.

6 Continuous Improvement

The Group is committed to review and enhance its approach to modern slavery risks within our supply chain periodically (minimum annually):

- 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.

This Modern Slavery Statement will be reviewed, updated, and published on an annual basis.

7 Accountabilities and Responsibilities of the Group

- 7.1** The Group maintains clear accountability for the identification, assessment, management and oversight of modern slavery risks across its operations and supply chains.

Responsibility Area	Responsible Function	Key Responsibilities
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Policy Ownership and Governance	Governance	Maintain and review this Policy, support implementation across the Group, monitor compliance, and coordinate reporting to management and the Board.
Supplier Due Diligence and Procurement	Governance, Client Liaison and Risk & Audit.	Conduct appropriate due diligence on suppliers, contractors and service providers, ensuring procurement activities align with the Group's Vendor Management framework and modern slavery expectations.
Vendor Legal Review	Legal, Governance and Relevant C-Suite Members.	Review and approve vendor arrangements where required and ensure contractual requirements appropriately address compliance, ethical conduct and modern slavery obligations.
Risk Monitoring and Compliance Oversight	Risk, Compliance and Governance	Monitor modern slavery risks, maintain relevant risk and issue registers, oversee investigations and remediation activities, and report material matters through the Group's governance framework.
Training and Awareness	People and Culture, Governance and Compliance	Support employee awareness of modern slavery risks, reporting obligations and escalation pathways through training, guidance and communications.
Issue Escalation and Investigation	Risk, Compliance, Legal and Governance	Assess and investigate suspected or actual modern slavery concerns and coordinate appropriate corrective actions, remediation activities and reporting obligations.
Executive Oversight	CEO, CRO, CLO and Executive Leadership Team	Provide oversight of material modern slavery risks, incidents and remediation activities, ensuring appropriate action is taken where concerns are identified.
Francom Oversight	C-Suite Team & Overarching Board	Provide oversight of the Group's approach to modern slavery risk management and receive reporting on material risks, incidents and remediation activities.
All Employees, Contractors and Representatives	All Personnel	Comply with this Policy and promptly report any suspected or actual modern slavery concerns through the Group's reporting channels, including the Whistleblower Policy where appropriate.

8 Review of this Policy

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

Executed By:

Full Name: Charles Antoun

Signature:



Date: 24.07.2026

Position: Managing Director