

Modern Slavery Statement

1. Details of the Reporting Entity

This Modern Slavery Statement covers the activities of Pepper Money Limited (ACN 094 317 665), for the financial year ending 31 December 2024 (**reporting period**) and has been prepared to comply with section 14 of the *Modern Slavery Act 2018* (Cth) (**the Act**).

In this Statement, all references to 'Pepper Money' are references to the reporting entity and its owned and controlled entities.

2. Introduction

At Pepper Money we recognise the responsibility that we have as an organisation to manage the risks associated with modern slavery in our business and within our supply chain. We are committed to eliminating the risks of modern slavery in our supply chains or in any part of our business. We aim to achieve this by operating in a manner that is sustainable, ethical, transparent and fair and we have designed policies and procedures to drive this behaviour within our business.

Our supply chain includes recruitment, technology providers and office supplies providers. We recognise the potential risks linked to human rights consequences in our supply chain.

This statement explains the actions taken during the reporting period and the measures implemented to manage the risks of modern slavery across our various businesses and controlled entities.

3. Pepper Money's Structure, Operations and Supply Chain

Pepper Money was established in 2000 as a non-bank lender to help Aussies achieve their financial dreams and listed on the Australian Securities Exchange (ASX) in 2021. Our lending options in Australia include home loans, car loans, equipment and asset finance loans, personal loans, commercial property loans, self-managed super fund lending.

Pepper Money owns and controls Australian and New Zealand businesses (including our shared service operations located in the Philippines). Pepper Money's operations and supply chain are reflected in this modern slavery statement.

4. Potential modern slavery risks in Pepper Money's operations and supply chain

a) Suppliers

There is a risk that we can be linked to modern slavery if we procure goods and services from suppliers who are connected to modern slavery. We deal with many suppliers for a

broad range of products and services. Our primary third-party suppliers are technology goods and services providers, professional services/ consultants and providers of office supplies.

b) Business operations

There is a risk that:

- (i) Pepper Money lends to customers who are connected to modern slavery or misuse our products and services to facilitate or benefit from modern slavery.
- (ii) Charitable donations and sponsorships support organisations connected to modern slavery.

5. Actions taken by Pepper Money to assess and address the risks

Modern slavery is a term used to describe situations of serious exploitation and includes:

- Human trafficking.
- Slavery.
- Servitude.
- Forced labour.
- Forced marriage.
- Debt bondage.
- Deceptive recruiting for labour or services.
- Child labour where children are subjected to slavery or similar practices or engaged in hazardous work.

6. Policies

We are committed to eliminating the risks of modern slavery in our supply chains or in any part of our business. The following policies have been reviewed to address modern slavery requirements including:

- Code of Conduct;
- Conflicts of Interest Policy;
- Financial Crime Framework Policy;
- Modern Slavery Policy;
- Procurement Policy;
- Sanctions Policy;
- Whistleblower Policy;

- Anti-Bribery and Corruption Policy;
- Anti-Money Laundering and Counter Terrorism Finance (AML/CTF) Programs and Procedures; and
- Supplier Management Framework, as further discussed below.

These policies and procedures (as further discussed below) are implemented to varying degrees by our controlled entities, depending on their business activities.

7. Supplier management framework

Assessment of modern slavery risk forms part of our initial risk assessment of all potential supplier engagements. We request our suppliers to complete our standard 'Know Your Supplier' (KYS) questionnaire, which includes questions to assist us to determine whether a supplier is 'high risk' (based on various factors) before engaging with that business. KYS processes have been implemented across Pepper Money and controlled entities.

In relation to the management of modern slavery risks, we are particularly focused on those supplier sectors with a higher risk for modern slavery including suppliers with a higher degree of sub-contracting and outsourcing to countries or regions known to have higher human rights and modern slavery risk, and so we pay particular attention to our technology providers (software, hardware and data centre providers) and providers of branded merchandise and office cleaning services. We will enter into a contract with a supplier which requires them to comply with the Act, including to notify us as soon as they become aware of any actual or suspected breach of the Act in the conduct of their business. Further, the terms of our agreement with the supplier allow us to perform audits to ensure adherence to modern slavery legislation.

There is due diligence and ongoing monitoring and screening of suppliers which is guided by the Supplier framework.

The Procurement team coordinate and manage the 'Know Your Supplier' process for Pepper Money controlled entities. Support is also provided by the legal, risk and compliance teams.

8. Operations activities

We seek to assess and identify modern slavery risks in our operations activities through a number of ongoing financial crime processes including:

- customer due diligence and customer risk assessment – enhanced customer due diligence is completed on customers who may pose a higher financial crime risk including modern slavery risk;
- employee due diligence and screening;

- due diligence of charity and sponsorship organisations;
- transaction monitoring
- sanctions screening;
- adverse media monitoring;
- ongoing monitoring and screening of customers.

9. Monitoring and reporting

We seek to combat modern slavery risks through a number of ongoing management and monitoring activities including:

- ongoing monitoring and screening of suppliers, customers and employees;
- regulatory reporting of customers and transactions;
- oversight through independent reviews and audits.

10. Receiving and responding to concerns

Employees have access to a Risk and Compliance System, to report any incidents or non-compliance with policies and procedures in accordance with Pepper Money risk management procedures.

Employees are actively encouraged to report or raise concerns (including anonymously) of any suspected illegal, unethical or improper behaviour (including in relation to modern slavery) within our business operations including in relation to the conduct of any supplier engagements.

To ensure an understanding of the risks of modern slavery in our supply chains and our business, we provide training to relevant staff where modern slavery is most likely to be identified or escalated including those who manage or are involved in the engagement of suppliers.

Financial crime training including anti-money laundering and counter-terrorism financing, fraud and corruption, and whistleblower training is completed by all employees to build employee capability in identifying, mitigating and managing financial crime risk.

Pepper Money executives are required to provide a regular attestation attesting to their business unit's compliance with Pepper Money Policies and Procedures including Procurement, Sanctions, Financial Crime Framework and Modern Slavery Policies.

11. Reporting

- a) Pepper Money's Environmental, Social and Governance (**ESG**) Report details Pepper's commitment to achieving the highest possible standards of ethical behaviour and best practice in corporate governance. This *includes reference to Pepper Money's requirements under the Australian Modern Slavery Act (2018)* including preparing an annual statement

describing the risks of modern slavery across our operations and supply chain, and the actions taken to address the risks.

- b) The Board Audit and Risk Committee of Pepper Money Limited receives regular reporting of financial crime risk mitigation activities including in relation to modern slavery risks.
- c) The Executive Team are responsible for the day-to-day management of financial crime risks including modern slavery.

12. Assessing the effectiveness of our actions

We are committed to taking all appropriate steps to mitigate the risk of modern slavery taking place in our operations and supply chain activities. This includes undertaking regular reviews of our governance, policies, procedures, processes and training which enable us to build capability to assess, identify and respond to the risks of modern slavery in our business operations and supply chain activities and respond effectively to any allegations or potential incidents that may be raised.

We continue to integrate learnings and regulatory guidance to mitigate the risks of modern slavery in relation to Pepper Money business operations and supply chain activities noting that modern slavery risks can change due to changes in business activities and/or external factors which can impact our risk exposure.

13. Process for consultation with controlled entities

In preparing this joint statement, we engaged with each of the reporting entities covered by this statement and consulted the entities we own or control. A final draft statement was made available to the Pepper Money Executive team for endorsement before tabling with the Board of Directors of Pepper Money Limited.

14. Details of approval given by relevant governing body

This statement was approved by the Board of Directors of Pepper Money Limited, as the parent entity and principal governing body on 18 June 2025.



Mario Rehayem, Director
Pepper Money Limited
Date: 18 June 2025