

MA Modern Slavery policy

October 2023



1. Policy statement

- 1.1 This Policy is in accordance with the *Modern Slavery Act 2018* (Act). MA Financial Group Ltd (MA Financial or Group) acknowledges that it is accountable for any form of modern slavery, servitude, human trafficking and forced labour. The purpose of this Policy is to ensure each entity of MA Financial is committed to acting ethically and with integrity and transparency in all its business dealings and relationships, and to developing and implementing effective systems and controls to ensure modern slavery issues are not taking place in its business and supply chain.

2. Scope and responsibilities

- 2.1 MA Financial has a zero tolerance approach to all forms of modern slavery and human trafficking within its business and supply chain. This Policy applies to all individuals working for MA Financial, including but not limited to, directors, managers, employees, contractors, interns, agents and consultants.
- 2.2 The Board of Directors have overall responsibility for ensuring this Policy complies with the MA Financial's legal and ethical obligations and putting measures in place that are designed to prevent and detect modern slavery and human trafficking within the business and supply chain.
- 2.3 Senior Management has responsibility for implementing this Policy to ensure those reporting to them understand and comply with this Policy and the issue of modern slavery in supply chains.

3. Definition of modern slavery

- 3.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as:
 - (a) slavery, servitude (coercing someone to provide services) forced labour, and child labour;
 - (b) human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited);
 - (c) committing any offence with the intention to commit human trafficking;
 - (d) aiding, abetting, counselling or procuring any of the above offences.
- 3.2 All of these practices deprive individuals of their liberty in order to exploit them for personal or commercial gain.

4. Policy

- 4.1 This Policy must be complied with and read in conjunction with the *MA Financial Group Code of Conduct* and other group-wide policies to ensure the protection of human rights and any modern slavery risks within the business operations and its supply chain are identified, assessed, managed and mitigated:
 - (a) MA Financial must ensure it is addressing modern slavery risks in its operations and supply chains in a way that is appropriate for relevant Business Divisions.
 - (b) Each Business Division must as far as practical, take steps to ensure its suppliers comply with all applicable laws and regulations in the areas in which they operate.
 - (c) Each Business Division must determine which parts of its business and which of its supply chains (both in Australia and offshore) are most at risk of modern slavery and focus on those areas most 'at risk'.
 - (d) Each Business Division must perform additional diligence on new suppliers that are considered to be 'high risk' to understand control procedures in relation to modern slavery.
 - (e) All employees must be treated with dignity and respect. Directors and Senior Managers must ensure the workplace is free from unfairness, discrimination and harassment, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.
 - (f) All employees must avoid any activity that might lead to, or suggest, any form of bribery or corruption in dealing with any third parties including suppliers.
 - (g) Providing awareness to employees on this Policy and on the risk the business of the MA Financial faces from modern slavery in its supply chain.
 - (h) Protecting employees and external stakeholders who are whistle-blowers in relation to modern slavery.

5. Annual statement

- 5.1 Prior to 30 June each year MA Financial will produce an annual public statement describing what it does to address modern slavery risks (Modern Slavery Statement).
- 5.2 The Modern Slavery Statement must describe:
 - (a) MA Financial's structure, operations and supply chains.
 - (b) The potential modern slavery risks in MA Financial's operations and supply chains.
 - (c) The actions MA Financial has taken to assess and address those risks, including due diligence and remediation processes.
 - (d) How MA Financial assesses the effectiveness of those actions.
 - (e) Future actions proposed to be taken by MA Financial in respect of modern slavery.
- 5.3 The Modern Slavery Statement must be reviewed and approved by the Board of MA Financial Group Limited.
- 5.4 The Modern Slavery Statement is submitted annually to the Department of Home Affairs and is displayed publicly on its website

6. Review and training

- 6.1 MA Financial recognises the importance of protecting human rights and the implementation of this Policy to the value and reputation of its business. Legal & Compliance have the primary responsibility for its implementation and effectiveness.
- 6.2 This Policy will be reviewed annually by Legal & Compliance.
- 6.3 All new employees will receive an overview of this Policy upon induction. Those employees that face key suppliers will receive training annually thereafter.

7. Consequences of non-compliance

- 7.1 MA Financial is committed to ensuring compliance with this Policy as part of its goal in preventing, detecting and reporting modern slavery in any part of the MA Financial's business and supply chain. We encourage all those working on the Group's behalf to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 7.2 MA Financial takes a strict approach to breaches of this Policy, which will be dealt with in accordance with the Group's Conduct of Conduct.
- 7.3 Failing to comply with this Policy may result in very serious consequences which may include disciplinary action for an employee. If appropriate, information may be handed to the police in connection with a criminal investigation.

