

MODERN SLAVERY POLICY

PURPOSE

The purpose of this Policy is to set out RMBL's commitment to preventing modern slavery as it relates to RMBL's operations as both a Responsible Entity of the RMBL Mortgage Income Investments Scheme and as a corporate entity and describes the steps we are taking to address these risks.

SCOPE

This Policy applies to all RMBL business operations and all directors, employees, contractors, suppliers and business partners of RMBL.

DEFINITIONS

Modern Slavery – describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Coercion, threats and deception can be explicit or implicit. RMBL adopts the definition of modern slavery as described in the Modern Slavery Act 2018 (Cth), which includes the following types of serious exploitation:

- Trafficking in persons
- Slavery
- Servitude
- Forced marriage
- Forced labour
- Debt bondage
- Deceptive recruiting for labour or services
- The worst forms of child labour (situations where children are subjected to slavery or similar practices or engaged in hazardous work).

POLICY STATEMENT

RMBL Investments recognises that modern slavery can occur in every industry and sector and is committed to doing its part to help eradicate modern slavery risks, by identifying and addressing modern slavery risks and maintaining a responsible and transparent supply chain.

As a non-bank lender, the risks of modern slavery within our direct operations are very low, however we acknowledge that risks may exist in our operations and supply chain, third party relationships and lending activities.

RMBL is committed to:

- Preventing modern slavery within our operations and supply chains;
- Ensuring that all aspects of our business adhere to legal and ethical standards; and
- Promoting transparency and accountability in our practices and relationships.

Operations and Supply Chain:

RMBL will have an appropriate approach in place to identify and mitigate modern slavery risks in our operations, supply chain and third party relationships. Wherever possible, RMBL will choose to deal with suppliers and partners who share similar ESG policies and values. We do not knowingly procure any goods or services from suppliers involved in modern slavery or ESG practices that do not meet expected community standards.

Most of RMBL's suppliers are professional service providers including law and accounting firms, auditors, insurance providers, information technology software and service providers. Other support suppliers utilised include recruitment firms, cleaning service providers, office supplies providers, and catering services.

Our suppliers are predominantly based in Australia with the provision of some IT services operating in New Zealand and India.

As per RMBL's Purchasing and Procurement procedure, as part of the supplier selection process, RMBL may send a questionnaire requesting details of the supplier's ESG and modern slavery approach to assess modern slavery risks. The absence of an ESG or modern slavery policy will not preclude the supplier from being appointed, however where practicable and commercial, RMBL will seek to align with suppliers with similar ESG and modern slavery goals and practices.

Lending Activities:

The commercial real estate, building and construction industries are known to have higher modern slavery risks. RMBL will include the consideration of ESG and modern slavery risks in its lending analysis and decision-making processes and will develop methodology to enable periodic risk assessments to identify and evaluate potential modern slavery risks. In addition, we will work with our borrowers where possible to understand how they are mitigating the risks of modern slavery in their operations and supply chains.

Knowing our borrowers, undertaking due diligence and ongoing monitoring are ways that we can identify and address modern slavery risks.

RESPONSIBILITY

The Board is responsible for approval of this Policy and for ensuring that decision making considers the ESG and modern slavery principles set out in this Policy.

The Executive Committee is responsible for also factoring in the ESG and modern slavery principles set out in this Policy in its decision making and in aligning strategic projects with those principles.

Recommendations and approvals of external service providers, including IT service providers, must include due diligence related to ESG and modern slavery considerations.

The Credit Committee members are required to consider ESG risks, including modern slavery, in preparing loan submissions and making decisions related to loan approvals.

The Senior Manager, People & Culture is responsible for keeping this Policy up to date as well as approving non-material changes to this Policy.

All employees are required to follow the requirements of this Policy and are encouraged to raise any concerns or suspicions of modern slavery with a member of the Leadership team.

RELATED POLICIES

- ESG & Responsible Investment
- Purchasing and Procurement Policy
- Purchasing and Procurement Procedure
- Delegations of Authority

APPROVAL AND REVIEW DETAILS

This Policy will be reviewed on at least an annual basis and is designed to be an iterative document that develops and evolves over time.

Version:	1		
Approved by:	RMBL Investments Ltd Board	Date:	16 September 2024
Next Review Date:	September 2025		

VERSION HISTORY

Version Number	Amended By	Details of Changes
1	Anne-Maree Nunan, Senior Manager People & Culture	Creation of Policy