



## **2024 Modern Slavery Statement**

**Liberty Financial Group Limited (ABN 59 125 611 574)**

**Liberty Fiduciary Ltd (ABN 80 119 884 623) as responsible entity for the  
Liberty Financial Group Trust (ARSN 644 813 847)**

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## 1. Overview

- 1.1 This Modern Slavery Statement (**Statement**) is for the period 1 July 2023 to 30 June 2024 (**Reporting Period**) and is made in accordance with the *Modern Slavery Act 2018* (Cth) and has been approved by the Board of Liberty Financial Group Limited (ABN 59 125 611 574) and Liberty Fiduciary Ltd as responsible entity of the Liberty Financial Group Trust (**Liberty**) on 12 December 2024.
- 1.2 This Statement is a joint statement of Liberty Financial Pty Ltd (ACN 077 248 983), Liberty Funding Pty Ltd (ACN 128 856 422) and Minerva Holding Trust (the trustee being Minerva Fiduciary Pty Ltd (ACN 637 593 849)) and applies to Liberty and its related bodies corporate (**Liberty Group**).
- 1.3 As a highly regulated Australian and New Zealand financial services business with a professional workforce, we consider the risk of modern slavery within our direct business operations to be low. However, we recognise that through our customers and supply chains we are indirectly exposed to modern slavery risks.

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## 2. Liberty Group

- 2.1 The Liberty Group was founded in January 1997 on the premise of fairness and financial inclusion. A premise that understands providing credit for good purpose has a sustainable and positive impact on society.
- 2.2 Liberty is an ASX listed diversified finance group with operations in Australia and New Zealand. The Liberty Group products include residential and commercial mortgages, motor finance, business loans, personal loans, brokering, real estate services and insurance. The Liberty Group has advanced over \$49 billion to over 850,000 customers and currently employs over 500 staff across Australia and New Zealand.
- 2.3 You can find more information in our [2024 Annual Report](#) and [2024 ESG Report](#).

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## 3. Commitment

- 3.1 Liberty remains committed to the highest standards of honesty, integrity, and ethical behaviour in all our business activities including responsible procurement.
- 3.2 The Liberty Group maintained its B Corporation certification and commitment to making a positive impact across its workers, customers, suppliers, community, and the environment. Certified B Corporations meet the highest standards of verified social and environmental performance, public transparency and accountability to balance profit and purpose.

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## 4. Policies and procedures

- 4.1 Given the Liberty Group's high ethical standards and practices and a strong corporate governance framework in place, the Boards have delegated the authority to their Audit and Risk Committee to oversee the approach to non-financial risks associated with environment, social and governance issues.
- 4.2 This approach is also aligned with our B Corporation certification, internal

training programs and associated policies including:

- Whistleblower policy;
- Supplier selection policy;
- Diversity and inclusion policy;
- Code of conduct;
- Anti-bribery and corruption policy; and
- Anti-money laundering and counter terrorism financing policy and program.

You can find these at <https://lfgroup.com.au/about-us/corporate-governance>

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## **5. Operations and people**

5.1 We annually assess whether across Liberty Group's operations an employee could be subject to conditions amounting to modern slavery. The assessment considers risks associated with our processes for recruitment and management of employees. We also consider the adequacy of our training, and the effectiveness of established grievance reporting channels to resolve issues or challenges arising in the workplace. Our remuneration practices are designed to be consistent with financial services industry practices in Australia and New Zealand and are attractive to compete for talent. Staff remuneration consists of both a fixed and variable component, based on achievement of corporate and financial objectives as well as the individual achieving a positive assessment against their own goals.

5.2 Liberty remains committed to an inclusive workplace that embraces and promotes diversity and inclusion. Our diversity and inclusion policy helps us with our strategic goals by:

- ensuring we treat all team members with equality and respect;
  - attracting, rewarding and retaining staff with a diverse range of skills and experience;
  - developing flexible workplace practices to recognise and meet the diverse needs of staff;
  - building and maintaining a safe and open workplace; and
- contributing to the community by fostering a culture of acceptance and teamwork.

5.3 We promote a culture that understands, encourages and supports equity and belonging through affirming, daily rituals and practices. During the year we hosted guest speakers on thought provoking topics, delivered training and introduced cultural immersion activities. We made sure these opportunities were available to everyone in the business.

5.4 To measure accountability for diversity and inclusion, we continue to review and update leaders' position descriptions to include gender diversity KPIs and targets, which are reported internally each month.

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## **6. Supply chain**

6.1 Our supply chain comprises of suppliers of both small businesses and large

corporations. Whilst our supply chain continues to be straightforward and not overly complex, the following areas of our supply chain require ongoing review. These include vendors and suppliers in relation to:

- building products and services;
- IT (hardware and software);
- catering;
- office and marketing supplies; and
- fleet management.

6.2 The key element of our due diligence is to identify whether our supply chain has committed to adhering with modern slavery laws in their jurisdiction. The majority of our supply chain have made statements regarding their commitment to these laws. We may require our suppliers to complete questionnaires outlining their compliance with modern slavery laws.

6.3 The risks associated with the Liberty Group's supply chains are considered to be low. While we did not identify any incidents or circumstances of high risk with any of our vendors or suppliers this year, we continue to undergo regular due diligence to ensure that the Liberty Group is not exposed to the risks of modern slavery. Staff may also report a suspected or identified modern slavery incident to the risk and compliance team for further investigation. Where effective due diligence for occasional purchases from overseas suppliers is not possible, we will seek to source goods locally.

6.4 Liberty conducts regular due diligence of all supplier arrangements. We will act against suppliers that fail to improve their performance in line with action plans, including terminating the business relationship. Prior to engaging in new supplier arrangements, Liberty:

- conducts a risk assessment and, where necessary, requests further information if there are any modern slavery concerns;
- performs an evaluation of the modern slavery risks associated with the new supplier; and
- ensures new supplier agreements include appropriate modern slavery obligations and commitments.

6.5 We frequently review our supplier selection policy to promote ethical and social impact sourcing within our community. In selecting any new service providers and suppliers, we remain committed to supporting, wherever possible, ethical businesses owned and operated by historically disadvantaged groups. This includes First Nations' peoples, women, and people with disabilities. Each business is required to investigate aligned service providers and suppliers and prioritise them if the needed services and standards are met.

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## 7. Business operations

7.1 Prior to engaging in any lending, Liberty captures the customer's information to comply with the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* (Cth). These steps are taken to verify the proposed customer's identity.

7.2 The majority of Liberty's lending business comprises Australian and New Zealand consumer lending for residential property purchase, motor vehicle purchase and other personal needs. We assess the risk of modern slavery being enabled or

- involved in consumer lending to be low.
- 7.3 Liberty's commercial lending portfolio primarily comprises lending to Australian based self-managed superannuation funds for the purpose of property investment. We assess the risk of modern slavery being enabled by, or involved in, the process of investing retirement savings in property to be low.
- 7.4 Liberty provides business lending products providing capital for business acquisition and working capital for small to medium business enterprises (SME) in Australia. The volume of lending in this segment during the Reporting Period remains small. Liberty's business loan assessment and underwriting are conservative and involve the collection and verification of financial and business information concerning each customer's activities for the purposes of loan underwriting. We assess the risk of modern slavery being enabled by, or involved in, the operations of the customers acquired during the Reporting Period as low.
- 7.5 The majority of Liberty's business is introduced by mortgage and finance brokers. Each broker is accredited by Liberty prior to any loan application being submitted, with various checks completed by either an aggregator or Liberty to confirm the identity of the broker. Liberty has assessed the risk of modern slavery being enabled by, or involved in, the operations of accredited brokers as low.
- 7.6 Our customer service teams are based at our head offices in Melbourne, Sydney and Auckland. Our teams manage all aspects of our customer care program. We do not outsource any aspect of it, nor do we sell any customer obligation to any other organisation.
- 7.7 Liberty has also signed a Platinum Partnership Agreement with Kinaway (the Victorian Aboriginal Chamber of Commerce) that is the peak representative of First Nations owned business in Victoria. As a result, we are committed to continuing to work with First Nations small business members of Kinaway to explore how our small business lending team can help.

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## **8. Group entities**

- 8.1 In preparing this statement we consulted across the Liberty Group. The core group of operating entities are centrally and collaboratively managed and supported by the same compliance, risk, finance, legal and executive teams. As such, formal consultation with individual entities was unnecessary.
- 8.2 The Liberty Group's operational risk and compliance team undertake consultation with businesses that are not centrally managed, including the Liberty Group's New Zealand based businesses.
- 8.3 All Liberty staff are required to undertake annual modern slavery training.

## **9. Assessing effectiveness**

- 9.1 The actions taken in financial year ended 30 June 2024 have been effective in reducing the risk of exposure to modern slavery.
- 9.2 Our review of the supply chains did not identify any high-risk arrangements.

## 10. Moving forward

10.1 We remain committed to the identification and mitigation of modern slavery risk during the year ending 30 June 2025.

10.2 We will continue to monitor, identify and maintain processes for the effective management of modern slavery risks.

**James Boyle**



**Chief Executive Officer**  
**20 December 2024**