



OFX Group Limited

# Modern Slavery Statement

FY2021

For personal use only

## Contents

- 5 CEO Statement
- 6 Our policies and procedures
- 7 About OFX
- 8 Our supply chain
- 10 Our approach
- 11 Our customers
- 12 Our actions
- 16 Planned actions in FY2022
- 18 How OFX assesses the effectiveness of actions taken

**This Modern Slavery Statement by OFX Group Limited (ACN 165 602 703) (OFX) is made pursuant to the *Australian Modern Slavery Act 2018 (Cth)* and the *Modern Slavery Act 2015 (UK)* in respect of OFX and its subsidiaries for the financial year 1 April 2020 to 31 March 2021 (FY2021).**

OFX recognises that, given its global operations, and as a significant purchaser of goods and services, we have a responsibility and opportunity to help eradicate modern slavery. We also recognise that our commitment to actions to address modern slavery risks in our operations and supply chain is essential to running a sustainable business.

We understand the importance of responsible procurement and ensuring that environmental, social and ethical considerations are taken into account when making procurement decisions. Our commitments in this Statement are consistent with the commitments in our Environment Social and Governance Framework as set out in the OFX Annual Report.

This Statement reflects our progress on meeting the requirements of the Australian Modern Slavery Act 2018 (Cth) and the Modern Slavery 2015 (UK) with a key focus on:

- Identification of modern slavery risks internal to our operations and in our supply chains;
- Mitigation actions for modern slavery risks; and
- Assessment of the effectiveness of these actions.



## CEO Statement

“

As a truly global business we are committed to ensuring that human slavery is not part of our supply chain or our operations more generally. We do this by putting in place the right policies and other measures to assist us to identify and do what we can to mitigate against modern slavery across our global footprint.

In FY2020, OFX developed its Modern Slavery Action Plan to assess the risk of modern slavery in its business and supply chain and identify the key actions to be undertaken to identify and manage the risks of modern slavery on our operations. I'm pleased to report on the good progress that has been made in FY2021 with actions taken, along with our longer-term aspirations to build awareness and address and mitigate modern slavery and human trafficking risks in the course of our interactions with suppliers and customers.”

**Skander Malcolm**  
Chief Executive Officer and Managing Director

## ➔ Our policies and procedures

Our work on Modern Slavery is supported by key OFX Group policies, including:

- **Code of Conduct**
- **ESG Framework**
- **Remuneration Policy**
- **Anti Money Laundering and Counter Terrorism Financing Policy**
- **Whistleblower Policy**

## ➔ About OFX

### **Our structure, operations and supply chain**

OFX grew from the idea that there had to be a better, fairer way to move money around the world. That was 20 years ago, and we're still driven by the same mission. Today, OFX can transfer money to over 190 countries in 55 different currencies. To date, we have helped over 1 million customers worldwide and have transferred over US\$100 billion.

Our clients are all over the globe, so we are too. We operate in offices in Sydney, Auckland, Hong Kong, Singapore, London, Dublin, Toronto and San Francisco to provide global expertise, delivered locally.

OFX employs over 400 people across Australia, New Zealand, Asia, North America and the United Kingdom and Europe. This includes permanent employees, casuals and maximum term contractors. The vast majority of employees are located in Australia, United Kingdom and North America.

OFX is supported by a supply chain composed of a reasonably complex global network across 10 countries. Our day-to-day operations facilitate the provision of remittance and foreign exchange services globally, providing an online international payment service to individuals and corporate customers.

More information about our business is set out in our 2021 Annual Report.

### **OFX's modern slavery risks**

We recognise that there are risks that OFX may cause, contribute to or be directly linked to modern slavery across our supply chain and our operations more generally. This risk can arise:

- As an employer;
- As a purchaser of goods and services – if modern slavery is involved in the production or delivery of those goods or services;
- As a financial services provider – if our financial products are used for activities that involve modern slavery.

### **Our employees**

The risk of exploited labour within a workforce tends to be higher in countries where there is higher risk of modern slavery and in the case of low skilled, indirect employment arrangements.

The vast majority of the OFX Group employees are based in Australia, New Zealand, London, Dublin, Toronto and San Francisco and more than 99% of our employees are permanent employees. All of our people are qualified or skills in financial services, technology or another support functions. This, and our supporting employee policies ensure that there is low risk to our employees of modern slavery occurring at our offices.

## Our supply chain

OFX has a global supply chain made up of approximately 1,500 direct suppliers, with payments being made by OFX to 494 suppliers in FY2021. 92% of these suppliers are concentrated in Australia, United States, United Kingdom, Canada and Hong Kong.

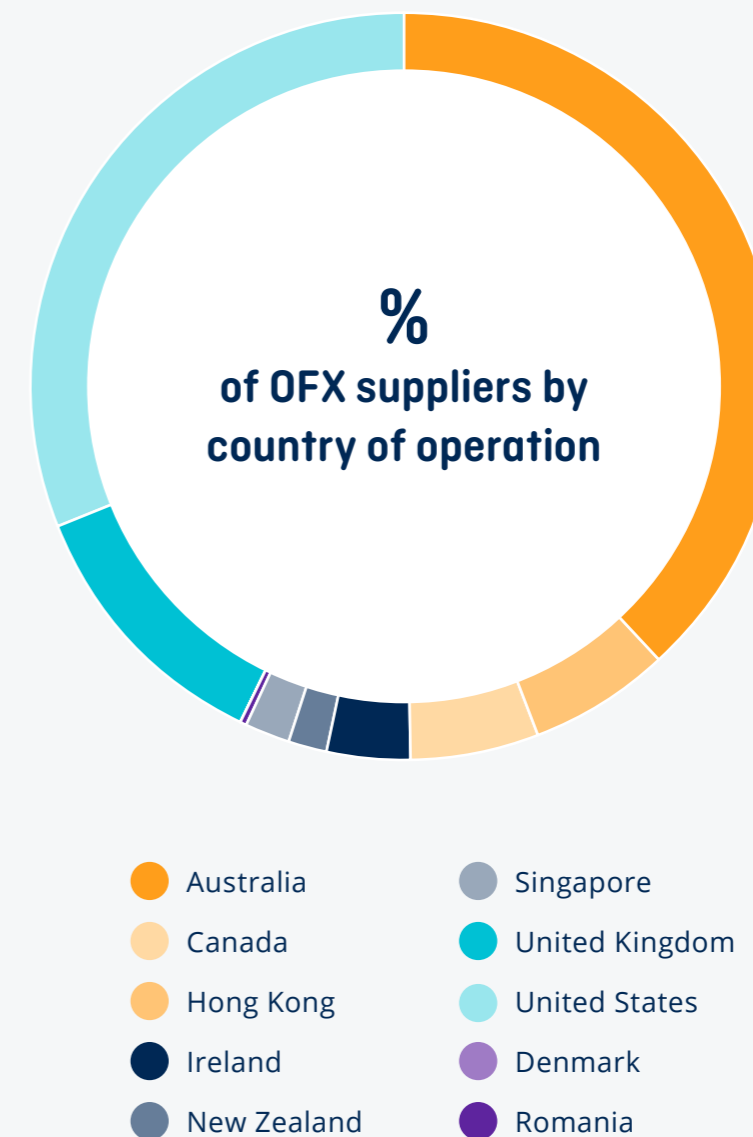
The following sectors are considered to be higher risk for modern slavery in the OFX Supply chain:

- Technology (hardware, software and cloud services);
- Information, Communications;
- Office consumables;
- Marketing;
- Promotional merchandise;
- Property Services (including facilities management, utilities, cleaning, waste management and security);
- Professional services; and
- Business process offshoring.

The risk assessment on OFX's supply chain for FY2021 indicated potential for exposure to modern slavery and human trafficking in these sectors specifically through:

- Purchase of office consumables such as tea, coffee, sugar, cocoa and fruit for staff consumption;
- Cleaning services employed by building owners or facilities managers for buildings occupied by OFX;
- Purchase of corporate clothing;
- Purchase of office hardware and electronics;
- Construction services in relation to office fit outs.

OFX identified 16 suppliers within these sectors in FY2021.



## Our approach

In accordance with the OFX Risk Appetite, OFX has zero tolerance for any form of slavery-like practices within its business and supply chain.

As a financial services organisation with a professional workforce, OFX considers the risk of modern slavery within its direct business operations to be low. However, OFX recognises that through its supply chain and customers it can be indirectly exposed to the risk of modern slavery and human trafficking. OFX seeks to do business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights.

OFX understands that the environmental, social and governance (ESG) risks relating to suppliers will vary depending on their industry, geographic location and company size and, therefore, the scope of OFX suppliers' policies, processes and systems are expected to reflect their specific ESG risks.

### The risks of modern slavery in the OFX Group's operations and supply chains

The first step in addressing and reducing modern slavery is to understand the risks of modern slavery in our operations and supply chains. In evaluating the potential or perceived risks of modern slavery, OFX considered the following factors as they relate to our suppliers:

#### Industry risk

Supply of a good or service from an industry where modern slavery may be directly or indirectly present in the supply chain – including whether the industry has predominantly base skill or migrant workers, whether a high proportion of businesses in the industry utilise labour hire, outsourcing or third party contracting arrangements and the nature of the product and service.

#### Geographical risk

Suppliers based in a high-risk geography (based on the Global Slavery Index) – including levels of corruption, the population's skill or education levels, rule of law and strength of human rights or labour laws.

#### Annual spend

Those suppliers who have at least one additional medium or high-risk factor and are within the top quartile of suppliers for annual spend.

*The Modern Slavery Risk Assessment for FY2021 approved by the OFX Board on 20 September 2021, identified 10 out of its 494 suppliers in the OFX supply chain for FY21 as being more at risk of modern slavery directly or indirectly having regard to these factors (down from 15 suppliers in FY20).*

## Our customers

As a financial services provider OFX recognise that our products could be used by customers for activities that involve modern slavery.

We recognise that this risk may be higher where we are involved in activities or countries that are high-risk for modern slavery, for example through our customers transacting to and from certain geographies or by facilitating investment in certain sectors. This includes linkages to modern slavery through entities that may use our financial services to launder money derived from modern slavery, such as child exploitation.

In accordance with AML/CTF legislation OFX collects specific information in order to identify and verify customers. Ongoing customer due diligence is also undertaken for the duration of the relationship.

OFX is a global money transfer specialist, with over 20 years' experience and eight offices around the world. With this tenure and global footprint, we see the diverse typologies of criminal financial activity and have built up years of data showing behavioural patterns to look out for. This includes typologies of low value payments to high risk countries which may be indicative of modern slavery.

We continually refine our detection strategies and actively investigate financial crime whenever we see it. This is achieved through our processes, teams and systems:

- All employees are regularly trained to detect and report potential suspicious activity;
- We maintain experienced and highly capable compliance teams in each of our key regions who support OFX in ensuring we understand our local regulatory requirements, understand indicators of modern slavery and have effective compliance programs in place;
- Financial crime controls are consistently tracked and discussed at management, executive and Board level; and
- Across our markets we undergo regular independent assessments through audits of our AML programs, banking compliance reviews and regulatory reviews.

The ESG Report in our Annual Report includes more detail of the technology implemented and the steps taken by OFX during FY2021 to enhance our ability to mitigate against financial crime.

## Our actions

### Actions taken by the OFX Group to assess and address modern slavery risks – FY2021

In FY2020 OFX began the assessment of modern slavery risks in our operations and supply chain and developed a Modern Slavery Action Plan outlining the key actions that will be undertaken to identify and manage the risks of modern slavery on the OFX supply chain.

The actions within this Modern Slavery Action Plan have been shaped by our assessment and prioritisation of our

modern slavery risks. They are targeted at building capabilities, improving our policies and processes and enhancing engagement with our suppliers.

In FY2021 we reassessed the modern slavery risks in our FY2021 supply chain and made significant progress to address the actions identified in the Modern Slavery Action Plan as follows:

Action Item	Action to be taken	FY2021 Status
<b>Governance</b>	Determining the governance structure for modern slavery and human trafficking for the OFX Group to facilitate consultation and preparation of a joint Modern Slavery Statement covering all OFX Group subsidiary reporting entities which meets the requirements of both the UK and Australian Modern Slavery Acts.	Completed FY2020 – In FY2021 responsibility for modern slavery and human trafficking risk for the OFX Group continued to be assumed by the Audit Risk and Compliance Committee.
<b>Improving our policies</b>	<p>Undertaking a gap analysis of the OFX Group's current policies and practices against the requirements of the Australian Modern Slavery Act.</p> <p>Enshrining OFX's expectations with regard to modern slavery and human trafficking in:</p> <ul style="list-style-type: none"> <li>the OFX Code of Conduct</li> <li>the OFX Employee Handbook</li> <li>the OFX Modern Slavery Standard</li> <li>the OFX Vendor Management Policy</li> <li>Whistleblower Policy</li> </ul>	<p>A gap analysis of the OFX Group's current policies and practices against the requirements of the Australian Modern Slavery Act was completed in FY2020 to determine the changes that need to be made to the policies and practices.</p> <p><b>Code of Conduct:</b> The OFX Code of Conduct was revised to enshrine OFX's expectations with regard to modern slavery and human trafficking and to establish consequences for non-compliance by employees and contractors with these standards. This revised Code of Conduct was adopted by the Board in July 2020.</p> <p><b>Modern Slavery Standard:</b> The Modern Slavery Standard outlines the key elements of the OFX Group's approach to identifying, managing and remediating modern slavery risks in our supply chain. It is applied in addition to standard vendor due diligence conducted on all vendors/suppliers OFX works with. This Modern Slavery Standard was adopted by the Board in August 2020 and is currently undergoing its annual review.</p> <p><b>Whistleblower Policy:</b> In July 2020 the Board approved revisions to the OFX Group Whistleblower Policy to provide a clear grievance channel for employees and suppliers to use in managing modern slavery.</p>

Continued 

## Our actions

[continued]

Action Item	Action to be taken	FY2021 Status
<b>Contract terms</b>	<p>Updating OFX supply contract templates to include mandatory anti-modern slavery provisions dealing with:</p> <ul style="list-style-type: none"> <li>Compliance with all applicable anti-slavery and human trafficking laws and regulations;</li> <li>Notification obligations in case of suspected slavery or human trafficking in the supply chain; and</li> <li>Audit rights to enable OFX to ensure that the supplier is complying with these obligations.</li> </ul> <p>Reviewing all proposed third-party supply contracts to ensure that the terms align to these requirements.</p>	<p>In FY2021 the OFX supply contract templates included mandatory anti-modern slavery provisions dealing with compliance, notification obligations and audit rights for OFX to monitor compliance. Suppliers are also required to warrant their compliance with modern slavery legislation.</p> <p>The OFX Group Vendor management process requires that the OFX legal team review all third-party supply contracts to ensure that similar provisions are included.</p>
<b>Training</b>	<p>Increasing awareness and all OFX staff undertaking training to ensure they understand, can identify and manage modern slavery risks.</p>	<p>A new "Modern Slavery" online training course was implemented for all staff in December 2020 to ensure that all OFX staff globally have received training on what is modern slavery, the risks and indicators of modern slavery and the legislative expectations. Successful completion of this course is an ongoing requirement for all OFX employees. The Course content is currently under review to ensure that it is up to date with development and typologies related to modern slavery.</p>
<b>Risk assessment</b>	<p>Developing a methodology for and implementing a <b>risk assessment</b> of our full supply chain to assess whether we are dealing with anyone who may have some link to modern slavery.</p>	<p>In September 2020, the OFX Board approved the first OFX Modern Slavery Risk Assessment. We have just completed an updated assessment of the Modern Slavery Risk Assessment and the OFX Board approved this revised Modern Slavery Risk Assessment in September 2021.</p> <p>Going forward, OFX will carry out a full assessment of its global supply chain at least every two years to assess which parts of OFX's operations and supply chain may involve modern slavery risks.</p>

Action Item	Action to be taken	FY2021 Status
<b>Enhanced supplier due diligence</b>	<p>Developing an <b>enhanced supplier due diligence</b> (ESDD) process, applicable to high risk suppliers to enable us to further assess whether they may have links to modern slavery. This will be primarily focussed on the results of a self-assessment to be performed by our high-risk suppliers.</p>	<p>Those suppliers who were determined by the FY2020 OFX Modern Slavery Risk Assessment to be high-risk for modern slavery have been subjected to enhanced supplier due diligence. This three-step process entails:</p> <ol style="list-style-type: none"> <li>Each of the 15 suppliers who were determined by the FY2020 OFX Modern Slavery Risk Assessment to be high-risk for modern slavery was asked to complete a self-assessment that is designed to assess the suppliers' policies and practices on slavery and human trafficking.</li> <li>Open source and proprietary systems were reviewed for indication that each of the suppliers paid by OFX or any of its subsidiaries in FY2020 or FY2021 may be involved in modern slavery.</li> </ol> <p>This adverse media screening is now running against all of these suppliers on an ongoing basis. Consequently, if something of concern happens (and is reported) OFX will know about it immediately.</p> <ol style="list-style-type: none"> <li>The supplier is subsequently categorised as 'high-risk - no concern' or 'high-risk - remediation required'.</li> </ol> <p>Records of the enhanced due diligence performed will be maintained in a dedicated Register which has already been created.</p>
<b>Grievance feedback mechanism</b>	<p>Updating the OFX Whistle-blower Policy to provide an avenue for OFX staff to access an externally operated whistle-blower system to <b>escalate any suspicions</b> of modern slavery or human trafficking anonymously.</p>	<p>OFX employees have an opportunity to escalate any suspicions of modern slavery which relate to our clients or their payments. Internal communications have been shared with staff to ensure this is understood.</p> <p>A dedicated anonymous platform is in place for OFX employees to report any concerns or issues.</p> <p>There have been no instances of concerns relating to modern slavery being raised via the whistle-blower mechanism to date.</p>
<b>Remediation</b>	<p>Where instances of modern slavery are present in the supply chain and where OFX considers high-risk suppliers are not sufficiently protecting themselves and the supply chain from the risk of modern slavery an appropriate approach will be tailored for the supplier in question.</p>	



## Planned actions in FY2022

Our FY2022 commitments to further develop our response to the risk of modern slavery include:

### Industry engagement and best practice

We are exploring being part of a Financial Sector Modern Slavery Consortium which is being established. The primary aim is to find ways to ensure the supplier enhanced due diligence processes are comprehensive.

### Increased awareness

References to modern slavery and human trafficking are being integrated into relevant internal communications and training which are designed to enhance employee awareness of the available avenues to escalate modern slavery concerns, including sessions delivered to staff on whistleblowing and unusual matter reporting. We are refreshing our modern slavery training to ensure that it is more targeted for each of the relevant jurisdictions in which we operate.

### Assessing effectiveness

We will seek feedback from key stakeholders during FY2022 to gain insight into the effectiveness of our actions and inform opportunities for improvement in future reporting periods. This will include tracking participation in general awareness training, updates to policy and procedure documents and outcomes of risk assessments.

### Enhanced supplier due diligence

During FY2022 those suppliers who have been determined by the OFX Modern Slavery Risk Assessment to be high-risk for modern slavery will be subject to enhanced supplier due diligence. This process entails:

- The supplier will be asked to complete a self-assessment that is designed to assess the suppliers' policies and practices on slavery and human trafficking. We are planning to take additional steps to strengthen the EDD process with the aim of ensuring the HR suppliers actually complete the self-assessment questionnaires.
- Open source and proprietary systems will continue to be utilised for indication that the supplier may be involved in modern slavery.

- The supplier's Modern Slavery Statement will be reviewed (if applicable).
- The supplier is subsequently categorised as 'high-risk – no concern' or 'high-risk – remediation required'.

Records of the enhanced due diligence performed will be maintained in a dedicated Register which has already been created.

### Enhanced engagement with suppliers

OFX is in the process reviewing and updating our Vendor Management Policy. The proposed updates include incorporating the OFX Modern Slavery Risk assessment into the vendor onboarding process.

This new Vendor Management Policy governs both the initial onboarding of suppliers and any ongoing due diligence, including oversight of vendor management risks, as required.

### Remediation

We are committed to investigating any reported concerns or incidents, and if those concerns are substantiated, taking appropriate steps to address the issues raised. We are also committed to maintaining the integrity of the reporting and investigation processes.

All substantiated incidents of modern slavery will be formally documented, investigated and reported to the Chief Legal Officer, and at least annually to Audit Risk & Compliance Committee.

We are committed to being open and transparent should any modern slavery incidents be substantiated and, where possible, we will report on the outcomes and remediation actions in future Modern Slavery Statements.

### Our aspirations

We recognise that attempting to eradicate modern slavery requires an ongoing commitment.

#### Looking ahead we plan to progress the following initiatives:

- Engage with suppliers in the highest risk profile groupings to assess exposure to modern slavery practices; and
- Consider the benefits of a stand-alone human rights policy to expressly articulate our approach to human rights and modern slavery.

## How OFX assesses the effectiveness of actions taken

We are committed to continually improving our approach to advancing human rights.

OFX recognises that the risks posed by modern slavery and human trafficking are constantly changing. As such OFX continues to monitor the effectiveness of our approach to preventing modern slavery and human trafficking in our supply chains.

We regularly review and assess the effectiveness of our policies, codes and standards as part of the OFX Risk Management Framework.

Measuring the effectiveness of our actions will help inform the future work plan and activities in relation to modern slavery. This will enable us to identify areas where staff require training, engagement with suppliers could be improved or efficiency improvements can be made to new or existing processes.

### Internal governance

Human rights risks, including modern slavery, are considered within our broader governance framework which is described in the OFX Annual Report.

#### Working Group

The OFX Legal and Compliance teams are tasked with assessing and addressing risks of modern slavery practices across our operations and supply chain. This Working Group established the Modern Slavery Framework and continues to oversee the actions required to implement these actions.

#### Implementation

The OFX Legal and Compliance teams are responsible for ensuring ongoing training and awareness raising for OFX employees is in place with respect to modern slavery. The OFX Legal and People & Culture teams are responsible for managing cases of any breach of the Code of Conduct.

#### CLO and COO

The Chief Legal Officer and the Chief Operating Officer report as required into the Audit Risk and Compliance Committee.

#### ARCC

The Audit Risk and Compliance Committee manage the risk of modern slavery in accordance with the OFX Risk Appetite and the Modern Slavery Risk Appetite and report to the OFX Board.

#### Board

The OFX Board are ultimately responsible for oversight of OFX's risk.

### Consultation with the OFX Group of companies in preparing this statement

OFX's global operating model means that, in most cases, a single supplier is used for supply in connection with OFX Group operations irrespective of the jurisdiction. This global operating model also means that the executive with oversight of a particular function has visibility to all relevant suppliers irrespective of the entity that is procuring the relevant goods or services.

While legislative obligations relating to modern slavery and human trafficking may only apply to certain entities within the OFX Group, OFX recognises that as a truly global business servicing customers globally and as a significant purchaser of goods and services we have a responsibility and opportunity

to help eradicate modern slavery and human trafficking. As a result, a decision has been taken to apply all elements of the Modern Slavery Action Plan globally.

Our Global Executive Team has been involved in the compilation and endorsement of this statement.

The OFX Board Audit Risk and Compliance Committee will retain oversight of our human rights and modern slavery risks through our Risk Management Framework.

This statement was approved by the Board of OFX Group Limited on 20 September 2021 and will be reviewed and updated annually.

#### Signed



**Steven Sargent**  
Chairman

30 September 2021



**Skander Malcolm**  
Chief Executive Officer and Managing Director

30 September 2021

For personal use only

