



2024 MODERN SLAVERY STATEMENT

INTRODUCTION & REPORTING ENTITY

This Modern Slavery Statement (the Statement) is made pursuant to the Australian Commonwealth's Modern Slavery Act 2018 and the United Kingdom's Modern Slavery Act 2015 by ColCap Financial Limited (ACN 650 487 353) (ColCap) and its related bodies corporate (the Group). This is ColCap's fourth Statement under the Australian Modern Slavery Act and our second under the UK Modern Slavery Act. It covers the period 1 January 2024 to 31 December 2024 (2024).

In this Statement use of the words "the Group", "ColCap Group", "we", "us" or "our" refers to ColCap and its subsidiaries, including any entities that the reporting entity controls and entities in which the reporting entity has an ownership interest exceeding 50%, unless otherwise stated. The risks and actions described in this Statement are those which relate to the business of the Group. Unless otherwise indicated, monetary amounts in this Statement are reported in Australian dollars and the data and information provided is as of 31 December 2024.

This Statement outlines the actions taken by the Group to identify, assess and mitigate modern slavery and human trafficking risks in our operations and supply chains during 2024. In preparing this Statement, all the Group's entities were engaged and consulted.

ColCap's success is measured not only by commercial outcomes, but by our overall contribution to the communities in which we do business. We believe that we must make a genuine positive difference in that context. ColCap achieves this through the choices that we make about the products we provide, how we run our business, who we choose to engage with, and through the commitments we make to our customers and communities over the long term.

Our mission is to bring innovative solutions to our community. At the heart of this mission is our focus on acting with integrity and respect as we strive to deliver value by daring to challenge.

In accordance with our mission, ColCap is committed to protecting and advancing human rights within the jurisdictions that we conducted business or had a physical presence in 2024, namely Australia, the United Kingdom, and the Philippines.

This Statement covers the products, operations, and supply chain of the Group. It also provides insight into the modern slavery risks that we identified in our products, operations, and supply chain across 2024 along with the actions that we took to address these risks as an employer, lender, service provider, acquirer of goods and services, and donor to charitable organisations.

Page 10 outlines the reporting criteria that this statement adheres to under the Australian and UK Acts respectively and identifies where each criteria is addressed.

**ColCap Financial Limited
(ACN 650 487 353)
is the Group's sole Reporting Entity
pursuant to section 14 of the Australian Act
and section 54 of the UK Act.**

In 2024 the ColCap Group comprised:

- ColCap Financial Limited
- Consortia Group Holdings Pty Limited
- Austrata Finance Pty Ltd
- Austrata Lending Services Pty Ltd
- AVA U2 Pty Ltd
- ColCap Financial Overseas Holdings Limited*
- ColCap Financial UK Limited*
- ColCap Investments Pty Ltd

- ColCap Pty Limited
- ColCap Servicing Pty Ltd
- Columbus Capital Financial Pty Limited
- Columbus Capital Funds Management Pty Limited
- Columbus Capital Pty Limited
- Elizabeth RR No.1 Limited*
- Elizabeth RR No.2 Limited*
- Elizabeth RR No.3 Limited*
- Granite Home Loans Pty Ltd
- Homestar Finance Pty Ltd
- Molo Tech Limited*
- Molo Holdings No.1 Limited*
- Molo Holdings No.2 Limited*
- Origin Mortgage Management Services Pty Ltd
- Pharos AQ 2020 Pty Ltd
- Pharos AQ-L 2021 Pty Ltd
- Pharos AQ 2021 Pty Ltd
- Pharos AQ 2021V Pty Ltd
- Pharos AQ 2022 Pty Ltd
- Pharos AQ 2023 Pty Ltd
- Pharos AQ 2024 Pty Ltd
- Pharos AQ NTX Pty Ltd
- Pharos AQ Pty Ltd
- Pharos CB 2020 Pty Ltd
- Pharos IAC 2017-2 Pty Ltd
- Pharos IAC 2018-1 Pty Ltd
- Pharos IAC 2019-3 Pty Ltd
- Pharos IAC 2020 Pty Ltd
- Pharos IAC 2023V Pty Ltd
- Pharos IAC 2024V Pty Ltd
- Pharos IAC Pty Ltd
- Pharos IAC-H 2021 Pty Ltd
- Pharos IAC-L 2021 Pty Ltd
- Pharos NB 2021 Pty Ltd
- Pharos NB 2022 Pty Ltd
- Pharos NB 2024 Pty Ltd
- Pharos NB Pty Ltd
- Pharos RV Pty Ltd
- Pharos WBC 2023 Pty Ltd
- Xpress Loans Pty Ltd

* Company Registered In the United Kingdom

Introduction & Reporting Entity

About ColCap

Risk Of Exposure

Action

Effectiveness & Entity Consultation

Reporting Criteria & Approval

ABOUT COLCAP | STRUCTURE & OPERATIONS

ColCap is a leading non-bank financial institution specialising in prime residential mortgage lending, in Australia and the United Kingdom.

Entities within the Group also provide products, services, and infrastructure to facilitate the provision of mortgage loan products to borrowers. Group entities also undertake third party loan servicing and trust management activities. The ColCap Group's business is funded through a combination of bank balance sheet warehouses and wholesale term capital market transactions (securitisation transactions), as well as fees it receives from its various products and services.

Core Businesses

We serve our customers through five key businesses: Origin Mortgage Management Services, Homestar Finance, Granite Home Loans, Austrata and Molo. As at 31 December 2024, our loan portfolio exceeded A\$16 billion. Our customers range from individual borrowers purchasing their first home to investors seeking specialist mortgages. Approximately 95% of ColCap's loan portfolio is originated through its Australian businesses.



Origin is an Australian wholesale distribution business that provides providing third-party funding for mortgage loans originated by Mortgage Managers under their brands. Origin also provides account servicing, back-office loan processing, underwriting and white-label mortgage management support.



Homestar is an Australian retail mortgage lending business that provides loans directly to retail consumers including loan products for owner occupied and investment purposes as well as SMSF and construction loans.



Granite is an Australian funder of residential mortgage loans originated primarily through mortgage aggregators and mortgage broking groups



Austrata is an Australian funder of strata loans originated primarily through owner's corporations and body corporates.



ColCap Financial UK Limited trades as Molo in the United Kingdom and is a digital mortgage lender offering loans direct to borrowers and through intermediaries. The business is initially targeting Buy-to-Let mortgages and in time will provide regulated mortgages.

Our Values

Our core values are the guideposts that help to ensure our decisions and behaviors are the right ones over the long term. They explain who we are and what we stand for, and they provide a roadmap for continued success.

Every day we seek to ensure that these core values demonstrate themselves in our products, our working relationships, our interactions with customers and our business operations.

Our core values

Bringing innovative solutions to our community

Care for our people

Own what we do

Lead by example

Curious & Innovative

Act with integrity & respect

Put the customer first

Introduction & Reporting Entity

About ColCap

Risk Of Exposure

Action

Effectiveness & Entity Consultation

Reporting Criteria & Approval

ABOUT COLCAP | STRUCTURE & OPERATIONS

People

The Group employs a professional, adult, workforce where the risk of modern slavery is generally expected to be low. All employees and contractors are employed / engaged in compliance with local laws, including meeting any requirements in relation to child labour. Some of the Group's employees in Australia and the United Kingdom are immigrants or skilled workers holding work visas, and similarly are employed in compliance with local laws and in accordance with the relevant jurisdiction's immigration criteria.

As of 31 December 2024, ColCap had 364 full-time equivalent permanent employees and contractors, 98 of which were employed in Australia, 215 in the Philippines, and 41 in the United Kingdom.

Locations

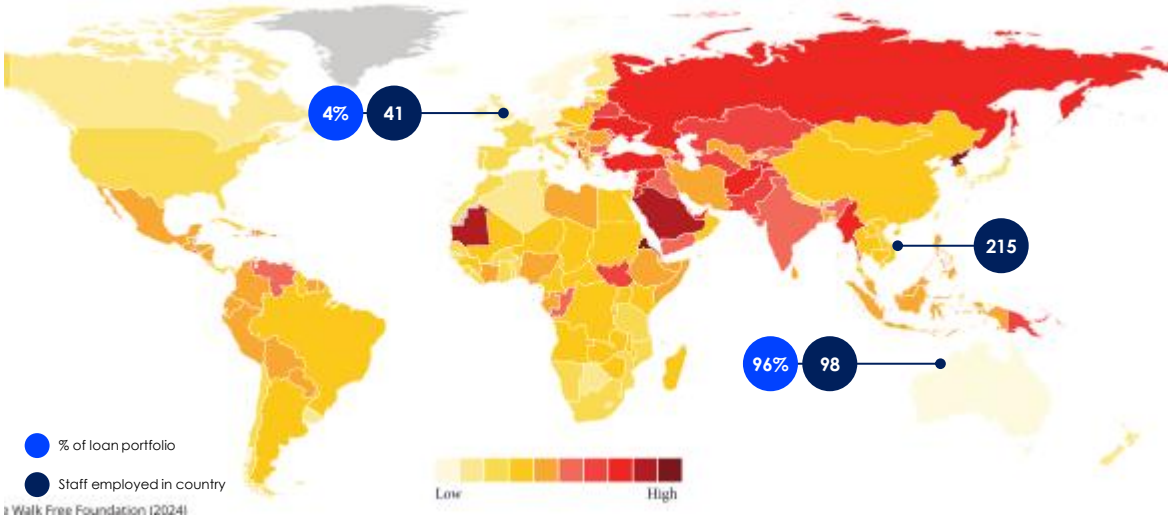
The group operates across three main jurisdictions; Australia, the United Kingdom, and the Philippines. Most of our people who are employed / engaged in Australia are based at the Group's corporate head office in Sydney. Our business in the United Kingdom is headquartered in London and a number of our people work remotely across the country.

Those staff and contractors who are located in the Philippines are based in Manila. Our operations in Manila are focused on providing services to our businesses in Australia and the United Kingdom through the wholly owned ColCap Servicing Pty Ltd – Philippine Branch Office.

Governance

ColCap's Board retains oversight of Modern slavery risk. Modern slavery considerations are integrated into business strategy, operations and risk management where relevant. The Board annually approves the Group's Modern Slavery

Locations where ColCap operates and employs staff overlaid on estimated country vulnerability to modern slavery.



Statement. In 2024, the Board was supported in its role by the Board Risk Committee (BRC) which had accountability for oversight of the Group's risk profile and risk management. This included modern slavery risk, within the context of Board determined risk appetite. Ultimate responsibility for oversight of risk appetite and risk management rests with the Board.

The BRC referred material matters to the Board in accordance with its charter, making recommendations to the Board concerning the Group's current and future risk appetite, risk management strategy and particular risks or risk management practices.

The Group's Chief Executive Officer and its Chief Operations Officer oversee enterprise-wide risk management through the Executive Committee and its supporting sub-committees.

These include the ESG Committee, which provides oversight of the Group's initiatives on environmental, social and governance matters. The Chief Risk Officer is accountable for the management of modern slavery risk as informed by the Group's risk management practices.

Managing Modern Slavery Risk

We take a risk-based approach to managing human rights-related issues like modern slavery and human trafficking. ColCap regularly looks for opportunities to enhance its risk management processes, which includes how it identifies, assesses, mitigates and monitors potential risk areas where the Group could be exposed to human rights concerns, including modern slavery and human trafficking.

- Introduction & Reporting Entity
- About ColCap
- Risk Of Exposure
- Action
- Effectiveness & Entity Consultation
- Reporting Criteria & Approval

ABOUT COLCAP | SUPPLY CHAIN

Supply Chain

We seek to do business with suppliers and other third parties that have similar values, ethics and sustainable business practices, including those related to modern slavery.

The Group procures a range of goods and services from a diverse supply chain. Our supplier arrangements range from one-off purchases with noncontracted suppliers through to multi-year, large value strategic partnerships governed by master agreements. We recognise that our suppliers play an important role in helping us to positively contribute to the social, economic, and environmental wellbeing of the communities that we are part of. Therefore, a modern slavery assessment forms part of our review when engaging with material suppliers.

Material suppliers are deemed to be those with whom we have an on-going contract for services with a value of over \$50,000, including our funding partners (Material Suppliers). Suppliers that were used only once during the year (and will not be used again) are also not considered to be 'material'. The majority of our direct material suppliers are based in Australia, the United Kingdom, and the USA.

Our assessment of suppliers has been developed to consider the likelihood of modern slavery risk within our supply chain and to assist us in determining whether a supplier is high risk. A supplier could be considered high risk due to several factors, including criticality of services, impacts on customers, exposure to financial crime, ability to meet regulatory / legal requirements and/or operating in or providing goods or services from higher risk countries or from industries considered to be at high risk of modern slavery.

There have been no substantive changes to our supply chain from the prior reporting period that have been identified as negatively impacting the Group's exposure to modern slavery risk.

Supply chain types that ColCap is exposed to.



Loan Funding
Institutional bank warehouses, trusts, and investors.



Financial Services
Insurers, deal advisors, investment managers, rating houses, and trust services.



Loan Origination
Mortgage managers, brokers, agents, and other intermediaries.



Customer Enablement
Banking services, card production, valuations, document services, commercial print, and processing services.



Technology Services
Professional technology / data services, telecommunications, application services, and technology infrastructure.



Professional Services
Consultants, lawyers, recruiters, human resource advisors, and accountants.

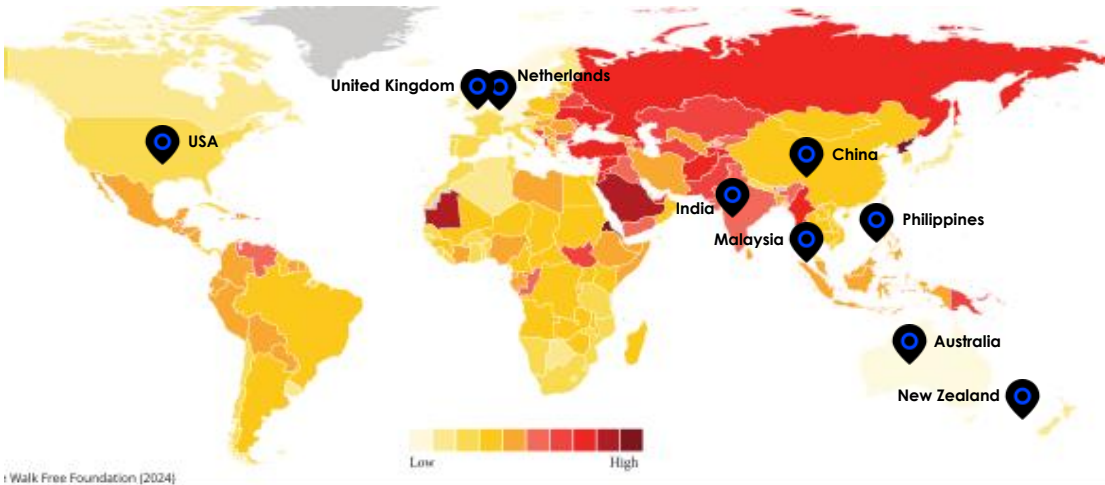


Regulatory Services
Tax agents, regulatory legal services, auditors, GST recoupment, fees and taxation.



Corporate Services
Real estate, cleaning, utilities, office security, travel, entertainment, corporate memberships, stationery and records management.

Locations (by Country) of material suppliers overlaid with estimated country vulnerability to modern slavery.



- Introduction & Reporting Entity
- About ColCap
- Risk Of Exposure
- Action
- Effectiveness & Entity Consultation
- Reporting Criteria & Approval

RISK OF EXPOSURE

ColCap takes a Group-wide approach to managing modern slavery risks in its operations and supply chain. In this Statement, unless stated otherwise, we describe our modern slavery risks based on the inherent factors that ColCap is exposed to (see illustration below).

We recognise that there are potentially multiple areas of modern slavery risk across our operations and supply chain given their global nature. We have assessed our modern slavery risk against the financial services we provide, the scope and scale of our supply chain.

Defining Modern Slavery Risk¹

Modern slavery is the serious exploitation of a person that undermines their freedom. When modern slavery occurs, a person cannot refuse or leave their work due to threats, violence, coercion, abuse of power or deception².

Modern slavery occurs in a variety of forms including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. Our definition of modern slavery risk includes explicit links between modern slavery and labour rights violations that are significant and systemic.

Modern slavery risk is the potential for ColCap to cause, contribute to, or be directly linked to one or more types of modern slavery through our products, operations, and / or supply chains (Modern Slavery Risk).

Identifying Modern Slavery Risk

We seek to identify our salient modern slavery risk exposures according to where we could potentially cause or contribute to significant negative human rights impacts based on the exposure types outlined below.

Our identification of modern slavery risk exposures incorporates current Global Slavery Index report (GSI).³ The GSI provides an estimate of the prevalence of modern slavery, as well as country-level vulnerability and government responses.

Factors that have contributed to the rise in modern slavery include increasing and more complex armed conflicts, widespread environmental degradation, assaults on democracy in many countries, and the lingering economic and social impact of the COVID-19 pandemic. We also recognise that these factors have impacted employment and education, which has increased poverty and unsafe migration that together have raised the level of modern slavery risk generally.

Inherent modern slavery risk factors that ColCap is exposed to.



Geographic

Location-specific exposure to modern slavery, based on societal vulnerabilities, including basic labour rights and working conditions, inequality, political stability, corruption, safeguarding of civil and political rights, discrimination, and gender equality.



Sector

Industry-specific exposure to modern slavery, based on competitive, market, and other forces that leave certain product and / or service types vulnerable to labour exploitation and other forms of modern slavery.



Business Model

Business-specific exposure to modern slavery, based on internal decisions about geographic distribution of supply chains, the degree of outsourcing, dependence on high-risk inputs, and sourcing of products with established links to forced labour.



Vulnerable People

Exposure to modern slavery because of interactions with individuals or groups of people who are or could be more readily exposed, or susceptible to harm (in a human rights context), or unable to advocate for themselves in exploitative or detrimental employment situations.



Situations

Situation-specific exposure to modern slavery controversies, based on alleged or verified failures to respect international norms on modern slavery by government, industry, individuals, religious institutions, and charities.

Introduction & Reporting Entity

About ColCap

Risk Of Exposure

Action

Effectiveness & Entity Consultation

Reporting Criteria & Approval

1. We use the Australian modern slavery legislation and reputable research to guide our approach to defining modern slavery.
2. As defined in the Australian Modern Slavery Act 2018 (Cth).
3. Walk Free: <https://www.walkfree.org/global-slavery-index/map/#mode=data>

RISK OF EXPOSURE

Assessing Modern Slavery Risk

Our annual risk assessment process considers the inherent modern slavery risk exposure factors in our products, operations, and supply chain. Inherent exposures are those which exist because of the nature and / or scope of the product, operational activity, or supplier before any mitigating actions (controls) are taken to alter the risk's potential impact or likelihood of occurring.

ColCap is inherently exposed to modern slavery risk given the global nature of our products, operations, and supply chain. We consider the overall residual risk of modern slavery in our products, direct operations, and supply chain to be moderate. This is due to the non-complex nature of our business, the highly skilled nature of our professional workforce, Board level oversight, our policies and controls, our approach to supplier governance, and having an accessible whistleblower mechanism.

No direct suppliers were based in high risk countries¹.

A Continually Evolving Risk

We recognise that modern slavery occurs at one end of a spectrum, ranging from decent work and respect for human rights, through to substandard working conditions and serious exploitations of human rights. ColCap understands that a person or group's experience may move on this spectrum over time or be disproportionately impacted where underlying vulnerabilities exist, creating challenges in identifying instances of modern slavery.

The Group's exposure to modern slavery risks is expected to change over time, as our business changes or as external factors influence our exposure to modern slavery risk.

As a financial services provider	The risk that a customer or group of customers may be vulnerable to exploitation, are already exposed to / experiencing modern slavery, or misuse our products to facilitate or benefit from activities that involve modern slavery.	<div><input type="radio"/> Cause</div> <div><input checked="" type="radio"/> Contribute</div> <div><input checked="" type="radio"/> Directly Linked</div> <div><input type="radio"/> No Involvement</div>
As a provider of wholesale securities	The risk that securities placed in the market by ColCap are taken up by investors who are connected with, facilitate, or benefit from modern slavery.	<div><input type="radio"/> Cause</div> <div><input checked="" type="radio"/> Contribute</div> <div><input checked="" type="radio"/> Directly Linked</div> <div><input type="radio"/> No Involvement</div>
As a Service provider	The risk that parties (who we provide services to) use our services to facilitate or benefit from activities that involve modern slavery or that they perpetrate, rely on, or benefit from, modern slavery in their own products, operations, and / or supply chains.	<div><input type="radio"/> Cause</div> <div><input checked="" type="radio"/> Contribute</div> <div><input checked="" type="radio"/> Directly Linked</div> <div><input type="radio"/> No Involvement</div>
As an employer	The risk that our workers (including contractors) are exploited, prevented from exercising their labour rights, or subjected to seriously unfavorable / adverse working conditions that are incompatible with their human rights.	<div><input checked="" type="radio"/> Cause</div> <div><input type="radio"/> Contribute</div> <div><input type="radio"/> Directly Linked</div> <div><input type="radio"/> No Involvement</div>
As a supporter of communities	The risk that our sponsorships, partnerships, grants or charitable donations allow the recipients or people / entities associated with them to facilitate or benefit from activities that involve modern slavery.	<div><input type="radio"/> Cause</div> <div><input checked="" type="radio"/> Contribute</div> <div><input checked="" type="radio"/> Directly Linked</div> <div><input type="radio"/> No Involvement</div>
As a purchaser of goods and services	The risk that we procure goods (or that there are components within goods that we procure) that are manufactured or sourced using modern slavery or that we procure services from a provider that connected to, facilitates, or benefits from modern slavery.	<div><input type="radio"/> Cause</div> <div><input checked="" type="radio"/> Contribute</div> <div><input checked="" type="radio"/> Directly Linked</div> <div><input type="radio"/> No Involvement</div>

Introduction & Reporting Entity
About ColCap
Risk Of Exposure
Action
Effectiveness & Entity Consultation
Reporting Criteria & Approval

1. As defined in the current Global Slavery Index.

ACTION | 2024 SUMMARY AND PLANNED ACTIONS IN 2025

Across 2024, ColCap delivered several key actions as we continued to mature our modern slavery practices in our operations and supply chains. We have been monitoring the effectiveness of our processes and procedures to address modern slavery risk that our business could cause, contribute to, or be directly linked to.

This page summarises the key actions in relation to modern slavery that were undertaken by ColCap in 2024. Modern slavery risk is managed via the Group-wide Governance, Risk, and Compliance (GRC) Framework.

Embedded Our Framework

Across 2024 ColCap continued work on embedding our Modern Slavery Framework (Framework). The Framework assists and guides us in identifying and managing our modern slavery risks in our operations and supply chains.

Embedded Whistleblowing

Following its initial implementation in 2022, we undertook further training and awareness activities to embed a culture of 'speaking up' within our business. Modern slavery is a form of reportable conduct under ColCap's Whistleblowing Standard. Through this mechanism, employees or workers within our supply chain can report any concerns anonymously through our third-party whistleblower hotline.

Increased Internal Awareness

We continued to promote internal awareness of modern slavery and its risks across our operations and supply chain during the year through various activities. We have proactively encouraged our staff in all geographies to be aware of what modern slavery can look like and remain vigilant.

Detection, Investigations, & Response

Our ongoing risk management activities across the Group did not detect a modern slavery incident related to our products, operations, or direct supply chain in 2024.

Continued to offer Updated Internal Training

We continued to offer updated modern slavery training (via our digital learning platform as a mandatory annual module for all employees and contractors) that included information on how to identify and respond to modern slavery risks and red flags.

Embedded Our ESG Committee

We have established and integrated our dedicated ESG committee to oversee Environmental, Social, and Governance matters, including modern slavery.

Strengthening Our Approach To Human Rights

During 2025, through its ESG Committee, ColCap plans to run a workshop on Human Rights to identify opportunities for improvement within our business practices as they relate to Human Rights.

During the first half of 2025 this will include a review and uplift of the Vulnerable Customer Policy and the Financial Hardship Policy and their associated processes. During the second half of the year, this will include an independent audit to ensure our practices are sound.

Other associated Policies such as ColCap's Whistleblower and Anti-Bribery and Corruption, will be reviewed and updated.

Supplier Management

ColCap will build on its Supplier Management in 2025, developing a Supplier Policy which details how suppliers are to be engaged and monitored. Further work to build out the Supplier Register will occur to further understand ColCap's supplier risks. ColCap expects to complete its Supplier Code of Conduct and to issue to all material suppliers.

Key Actions In 2024

Ongoing Risk Assessment	We regularly considered our assessment of modern slavery risk within the context of operating environment change, business change, and new supplier arrangements.
Training & Awareness	Staff and contractors across the Group undertook a range of online training courses to improve their understanding of modern slavery and identifying modern slavery risks.
Whistleblower Hotline	We maintained our independent and externally accessible whistleblower hotline so there was an anonymous way of raising modern slavery concerns.

Planned Actions In 2025

Governance	Update key policies (Whistleblower, Anti-Bribery and Corruption, Vulnerable Customer, and Financial Hardship) and look for opportunities to improve human rights within ColCap's lending business.
Awareness & Reporting	Improve Board Reporting relating to Suppliers and Modern Slavery
Stakeholder Engagement & Due Diligence	Strengthen due diligence processes for suppliers and partners, including the development of a new Supplier Policy, refresh of the Supplier Register and complete the Supplier Code of Conduct.
Assurance	Conduct targeted assurance over ColCap's Vulnerable Customer Policy and Process; and Financial Hardship Policy and Processes.

Introduction & Reporting Entity
About ColCap
Risk Of Exposure
Action
Effectiveness & Entity Consultation
Reporting Criteria & Approval

EFFECTIVENESS & ENTITY CONSULTATION

ColCap is committed to conducting our business in a way that respects human rights and reduces the risk of modern slavery. Our focus has been on implementing our updated training / awareness actions along with our enhanced due diligence approach. We have sought to further incorporate our UK businesses into our Group-wide approach to modern slavery.

We recognise that our approach, must be supported by processes to help identify and understand where high risk areas exist and that effective controls mitigate them appropriately (including having the capability to respond to actual or alleged incidents).

Measuring Effectiveness

Defining metrics that measure success in uncovering, identifying and managing modern slavery risk is challenging and an evolving discipline. We look at quantitative and qualitative measures to track our progress, inform improvements to our approach, and measure our overall effectiveness across our modern slavery program of work during each financial year. We seek to identify new measures of effectiveness as our approach to modern slavery evolves and new industry benchmarks are established.

We assess the effectiveness of our actions in identifying and managing modern slavery risks. Our actions include regular consideration of our corporate governance along with tracking our actions and outcomes. We regularly review our supplier onboarding and monitoring processes. We also review the effectiveness of our policies, procedures, incident reporting and grievance mechanisms.

Focus Area	Measure	2024 Outcome
Governance	Board Risk Committee Meetings	4
	Modern slavery policy breaches	0
Awareness & Capability	Staff / contractor completion of modern slavery training (online)	100%
	Staff / contractor completion of vulnerable customer training (online)	100%
	Staff / contractor completion of whistleblower training (online)	100%
Stakeholder Engagement & Due Diligence	Formal requests for proposal that included modern slavery questions	100%
Assurance	External auditor concerns / qualifications in relation to modern slavery	0

Entity Engagement & Consultation

ColCap reviewed its related bodies corporate and Trusts in order to assess and reconfirm which entities met the threshold for being a reporting entity under the Australian Act and UK Act in 2024.

We maintained ongoing engagement and consultation across the Group on our collective assessment of and actions in relation to modern slavery during 2024. There was regular contact between our Board and Management, including relevant business areas and the Legal, Risk and Governance teams.

This engagement and consultation facilitated collaboration between business representatives (which cover our owned and controlled entities) and subject matter experts on the identification, assessment and management of modern slavery risk across our business, including supporting tools and resources.

- Introduction & Reporting Entity
- About ColCap
- Risk Of Exposure
- Action
- Effectiveness & Entity Consultation
- Reporting Criteria & Approval

REPORTING CRITERIA & APPROVAL

Australian Commonwealth Modern Slavery Act 2018 Mandatory Reporting Criteria	United Kingdom's Modern Slavery Act 2015 Requirements	ColCap's 2025 Modern Slavery Statement Page Reference
1) Identify the reporting entity.	N/A	Page 2
2) Describe the structure, operations and supply chains of the reporting entity.	54(5)(a) the organisation's structure, its business and its supply chains	Pages 3 to 5
3) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	54(5)(d) the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	Pages 6 to 7
4) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	54(5)(b) its policies in relation to slavery and human trafficking; (c) its due diligence processes in relation to slavery and human trafficking in its business and supply chains; and (f) the training about slavery and human trafficking available to its staff	Pages 8
5) Describe how the reporting entity assesses the effectiveness of such actions.	54(5)(e) its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	Page 9
6) Describe the process of consultation with any entities that the reporting entity owns or controls. In the case of a reporting entity covered by a statement under section 14 – the entity giving the statement.	N/A	Page 10
7) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A	N/A

ColCap strives to continually improve our approach to identifying, assessing, and managing modern slavery risks across our operations and supply chains globally.

In accordance with the requirements of section 14(2)(d) of the Australian Modern Slavery Act and section 54(6)(a) of the UK Modern Slavery Act, this Statement was approved by the Board of ColCap Financial Limited (as the *principal governing body*) on 28 May 2025.

ColCap Financial Limited is a 'higher entity' within the meaning of section 14(2)(d)(iii) of the Australian Modern Slavery Act 2018, being the entity in a position to influence or control the other entities covered by this Statement.

This Statement is signed by Jane Tongs as the *responsible member* in her role as Chair of ColCap Financial Limited.

J A Tongs

JANE TONGS | CHAIRPERSON
26 June 2025

Not Advice

This statement contains general information only and is not intended to provide any form of advice. You should consider whether the information in this statement is suitable for your needs and we recommend that you seek professional advice.

No Liability

To the extent permitted by law, no liability is accepted by ColCap Financial Limited or any of its related bodies corporate for any loss or damage as a result of any reliance the information contained within this statement.

Introduction & Reporting Entity

About ColCap

Risk Of Exposure

Action

Effectiveness & Entity Consultation

Reporting Criteria & Approval