

# JOINT MODERN SLAVERY STATEMENT FY23

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## Introduction

Zip Co Limited is an ASX listed (ZIP: ASX) leading global financial services company that offers point-of-sale credit and digital payment services in core markets around the world.

This joint Modern Slavery Statement (“**Statement**”) is Zip’s fourth Statement and covers the reporting period for 1 July 2022 to 30 June 2023 (“**reporting period**”). This Statement applies to Zip Co Limited and ZipMoney Payments Pty Ltd (as reporting entities under the *Modern Slavery Act 2018* (Cth) (the “**Act**”)) and the entities that they own or control operating in Australia, New Zealand, the United Kingdom, the United States, Mexico, Singapore and Canada (“**Zip**”, “**we**”, or “**our**”).

Since the last Statement, Zip has initiated the divestment and wind down of the Spotii business in the Middle East, Payflex in South Africa and Twisto in the Czech Republic and Poland, and closed its operations in the United Kingdom, Mexico and Singapore.

We understand that slavery extends far beyond traditional legal notions of corporate responsibility, as modern slavery can occur in many forms, including forced labour, child labour, domestic servitude and human trafficking. In this Statement, we refer to ‘modern slavery’ as defined by the Act.

We are committed to operating our business lawfully and ethically. We expect our suppliers to do the same, including operating in accordance with all applicable modern slavery laws. We are equally committed to upholding all laws regarding corporate social responsibility, workplace health and safety, and diversity, equity and inclusion.

## Key initiatives in FY23

Conducting our business in a responsible and ethical manner, and making positive contributions to the communities in which we operate, is critical to the way we do business. Our zero tolerance to modern slavery is part of that approach.

During this reporting period, we continued to implement and ensure compliance with our modern slavery commitments, including through the completion of the following key steps:

- performing an operational risk assessment to assess the level of modern slavery risk in Zip's operations;
- Performing a modern slavery risk assessment of Zip's high risk and key new suppliers;
- through the Modern Slavery Working Group (a cross-functional and jurisdictional working group comprising members from business functions including finance, legal, compliance, financial crime, new markets and representatives of Zip's subsidiaries), undertaking a consultation about Zip’s modern slavery plan with representatives of subsidiaries in the global Zip group;
- as part of our modern slavery road map, applying internal Key Performance Indicators (KPIs) to demonstrate the continuous improvement approach taken to address modern slavery. Some KPIs include:

- the number of suppliers disclosing information relating to modern slavery through our questionnaire;
- the roll out and implementation of policies; and
- the number of employees who have completed the modern slavery training.
- through the Modern Slavery Working Group, initiating the following recommended actions from our modern slavery roadmap:
  - rolled out corporate governance training to all staff and directors; and
  - continued raising awareness of Zip's whistleblowing service and process.
- updating Zip's Supplier Code of Conduct to take account of recommendations made following an independent review of the Code;
- updating Zip's Human Rights Statement;
- raising awareness of Zip's anonymous whistleblower hotline among employees, contractors and sub-contractors. During the reporting period, no modern slavery incidents were reported through the whistleblower hotline. Zip also reviewed all whistleblower reports to assess whether they related to modern slavery or human rights;
- requiring all staff (except for staff in the United States and Canada) to complete modern slavery training; and
- continuing to enhance our risk management processes with a focus on core markets in Australia, New Zealand and the United States.

The Boards of Zip Co Limited and ZipMoney Payments Pty Ltd have approved this Statement for lodgement, in accordance with the Act's requirements on 15 December 2023.



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Cynthia Scott  
Group CEO

## Zip's structure, operations and supply chains

Zip's journey began in 2013, when we launched our first product, Zip Money. Since that time, Zip has expanded its product and customer base, and opened operations globally. During this reporting period, Zip had 6.2 million active customers delivering \$8.9 billion in total transaction value to our 72,000 plus merchants across our core markets Australia, New Zealand and the United States.

### Structure

Our parent company, Zip Co Limited, is a publicly listed company (ASX: Z1P) that is registered and domiciled in Australia. ZipMoney Payments Pty Ltd, a wholly owned subsidiary of Zip Co Limited, operates Zip's operations in Australia (which include consumer products Zip Pay and Zip Money and the business product Zip Business Capital).

Within the Zip group, our services and products span a range of countries including Australia, the United States, New Zealand and Canada. During the reporting period, Zip also operated in Mexico, Singapore and the United Kingdom, however, wound down these operations during that period. Zip also progressed the closure of operations with Spotii in the United Arab Emirates and the Kingdom of Saudi Arabia, and divesting its European business, Twisto, in Poland and the Czech Republic and Payflex in South Africa. These operations were sold shortly after the reporting period.

As at 30 June 2023 we employed 791 employees globally. This is made up of 736 full time employees, 12 part time employees, and 43 casual staff. Our employees also include 130 foreign workers of which 50 had working visas provided by Zip.

We note that the number and location of contractors within our business may vary from time to time.

### Operations

Zip is a leading player in the digital retail finance and payments industry. We offer point-of-sale credit and digital payment services to the retail, home, health, automotive and travel industries. Though Zip's operations remained largely the same as set out in the 2022 statement, Zip's geographical footprint has changed since that time as a result of the winding down or divestment of operations in Mexico, the United Kingdom, Singapore, United Arab Emirates, the Kingdom of Saudi Arabia, Poland, the Czech Republic and South Africa.

During the reporting period, our focus has also shifted from global expansion to growth in core markets. We are therefore allocating capital and resources to the core markets of Australia, New Zealand and the United States, where we see the most significant opportunity for profitable growth in the near term.

### Supply chains

During the reporting period we directly engaged 1,303 suppliers, including 537 new suppliers. The majority of our high risk and key new suppliers were based in Australia and the United States. We also engaged suppliers based in the United Kingdom, New Zealand, Mexico, South Africa, Singapore and Czech Republic. We engaged with one high risk or key new supplier each from Hong Kong, Belgium, Canada, the Netherlands, Slovakia, Turkey and the United Arab Emirates during the reporting period.

Our top 5 categories of procurement spend (over \$1M) for our high risk and key new suppliers for this reporting period were suppliers in the following industry categories:

- IT services including IT consulting, software development and data management/analysis;
- marketing, media, social media and advertising;
- retail;
- financial services; and
- IT/computer equipment.

Consistent with our previous statement, our suppliers continue to predominantly consist of other professional services including IT (e.g., software applications and subscriptions, sales, advertising and marketing), as well as financial services. This is reflective of the high dependency of our business on technological products, software applications and finance.

### Zip's Modern Slavery Risks

Considering the nature of our industry, operations, products and supply chain against the risk assessment methodology that was applied, we consider our overall risk of modern slavery to be moderate to low.

This year, we engaged an independent specialist firm to examine the modern slavery risks for suppliers contracted by Zip in Australia, New Zealand, the United States, the United Kingdom, Mexico, Singapore, Canada, United Arab Emirates, South Africa, Belgium, the Netherlands, Slovakia, Turkey and the Czech Republic. The assessment assessed the key high risk suppliers from last year's modern slavery assessment and key new suppliers. It found that:

- we primarily procured goods and services from suppliers who are inherently low risk from a modern slavery perspective; and
- while 20% of our suppliers operated in sectors with an inherently high risk of modern slavery, only 1 of these operated in an inherently high risk geography. Although some of the goods and services that we procure may be higher risk from a modern slavery perspective, including computer hardware and IT equipment, ecommerce retail goods and transport, logistics and utilities services, Zip strives to source goods and services from reputable third parties, and we regularly review our supply chain selection and management processes with these risks in mind.

To date, there have also been no reported cases of actual or suspected modern slavery or associated conduct, made directly to Zip or via our independent and anonymous whistleblower hotline.

### Description of the Modern Slavery Risks in Zip's Operations

We have assessed the modern slavery risk in our operations based on the nature of our operations, the geographical location of our operations, and our relationship with our employees. Based on these factors, we have assessed the risk of modern slavery in our operations to be low.

- ***The nature of our operations and our products and services.*** Zip operates in the financial sector, offering services including Zip Money, a line of credit provided to customers, and Zip Pay which offers 'Buy now Pay Later' products across several markets. The risk of modern slavery occurring in the finance

sector is generally considered low, mainly because of the use of a skilled, professional workforce.

- ***The geographical location of our operations.*** During the reporting period, Zip operated through wholly owned subsidiaries in Australia, New Zealand, Canada, the United States, the United Kingdom, Mexico, United Arab Emirates, Kingdom of Saudi Arabia, South Africa, Czech Republic and Poland. The majority of our operations are based in jurisdictions which have been assessed by the Global Slavery Index as having a lower prevalence of modern slavery practices. The United Arab Emirates and the Kingdom of Saudi Arabia has a slightly higher score for vulnerability to modern slavery of 13.4 and 21.3 victims per 1,000 population respectively. Zip wound down its operations in these countries during the reporting period. Zip also had operations in countries with a moderate geographic risk. These were the United States, Mexico, Czech Republic and Poland which have a modern slavery prevalence of 3.3, 6.6, 4.2 and 5.5 victims per 1,000 population respectively. Operations in the Czech Republic and Poland were also wound down during the reporting period.
- ***The relationship with our employees.*** Zip has procedures to ensure fair and equitable treatment and remuneration of employees. This is evidenced by the nature of our relationships with our employees. In particular, Zip does not engage:
  - any unskilled, temporary and/or seasonal labour; and
  - any staffing agencies for recruitment purposes (we may partner with specialist recruitment specialists to hire niche and critical talent, however new recruits are hired through Zip's established recruitment process).

Zip has a relatively small number of short and long term independent contracts with offshore organisations in India and the Philippines. A minority of these independent contracts are with individuals. There are strict laws relating to employment and workplace safety in these jurisdictions. All full-time, part-time and casual Zip employees are provided with a written contract with clear terms of employment including remuneration and hours of work. Finally, Zip has implemented clear internal recruitment policies across our business to ensure equitable remuneration and treatment of employees. It further conducts regular external benchmarking of these policies.

### Description of Modern Slavery Risks in Zip's Supply Chain

As noted above, an independent specialist firm was engaged again this year to perform a risk assessment to understand the risk of modern slavery in our supply chain. The risk assessment comprised an analysis of the key high risk suppliers from last year's supply chain risk assessment and key new suppliers, as well as the jurisdictions in which these suppliers are located, the type of goods or services obtained from the suppliers in each of those jurisdictions, any previous or suspected modern slavery allegations or incidents in relation to each supplier, and, if known, the nature of the suppliers' relationships with their workers. This analysis was performed at a supplier and jurisdictional level and was carried out with respect to Zip's direct suppliers (referred to as 'tier 1 suppliers').

In performing this risk assessment, a number of sources were considered, including:

- the Global Slavery Index 2023, prepared by the Walk Free Institute, the most authoritative guide to global modern slavery risk based on country;

- 'Hidden in Plain Sight', the Commonwealth of Australia's Final Report of the Inquiry into Establishing a Modern Slavery Act in Australia;
- the United States Department of Labor's 2022 List of Goods Produced by Child Labor or Forced Labor (as of 28 September 2022); and
- Verité's 'Strengthening Protections against Trafficking in Persons in Federal and Corporate Supply Chains' report.

As a result of the risk assessment, we identified the following industry categories as presenting higher risks of modern slavery in the supply chain assessed:

Industry	Overall	Jurisdictional risk	Industry Risk	Comment
IT / computer equipment	High	Moderate	High	Most of Zip's suppliers in this category are located in jurisdictions which are considered low to moderate risk jurisdictions for modern slavery. However, products within this category typically involve complex supply chains which have been associated with forced labour and modern slavery practices. We have less visibility over the lower tiers of these supply chains. We have also identified adverse media in respect of Zip's suppliers in this industry. We have therefore assessed our suppliers within this category as being at a higher risk of modern slavery.
Transport, logistics and utilities	High	Moderate	High	Most of Zip's suppliers in this category are located in jurisdictions which are considered low to moderate risk jurisdictions for modern slavery. However, the transport and logistics sector is considered to be an inherently higher modern slavery risk category because of the lack of visibility and the significant presence of contractors, agents and other intermediaries in this industry. We have less visibility over the lower tiers of these supply chains. Finally, we have also identified adverse media relating to allegations of modern slavery in relation to one supplier in Zip's supply chain. We have therefore assessed our suppliers within this category as being at a higher risk of modern slavery.

Industry	Overall	Jurisdictional risk	Industry Risk	Comment
Retail	High	Moderate	High	<p>All of Zip's suppliers in this category are located in jurisdictions which are considered to be low to moderate risk for modern slavery. However, retail supply chains may pose a higher risk of modern slavery because the supply chain usually consists of garments, electronics and accessories which are high risk goods. We have less visibility over the lower tiers of these supply chains. Finally, we have identified adverse media relating to modern slavery in relation to two of Zip's suppliers in this industry. We have therefore assessed our suppliers within this category as being at a higher risk of modern slavery.</p>
IT services	High	High	Low	<p>The majority of Zip's suppliers in this category are located in jurisdictions which are considered to have a low to moderate risk for modern slavery. However, the higher risk rating has been adopted as one supplier is based in a high risk jurisdiction. IT services, which includes IT consulting, software development and data management and analysis, is categorised as a low risk industry. However, we have adopted an overall high risk due to a finding of adverse media against a supplier in this category in relation to modern slavery.</p>
Event management and hospitality	High	Moderate	High	<p>While we identified only one supplier in this category, we understand that event management and hospitality may fall into hospitality industries and food related goods which are produced in high risk supply chains. The jurisdiction of this supplier was categorised as moderate risk. We have adopted a conscious approach and included this supplier here.</p>



Industry	Overall	Jurisdictional risk	Industry Risk	Comment
Recruitment, employment consultants and talent acquisition	High	Moderate	High	Most of Zip's suppliers in this category are located in jurisdictions which are considered to have a low risk of modern slavery. However, one of our suppliers was located in a moderate risk jurisdiction. Recruitment, employment consultants and talent acquisition services do not fall into high risk industries however the industry may be associated with labour hire which may pose a high risk of modern slavery.

We considered the other categories of our supply chain to be lower risk.

### Actions taken by Zip to address its Modern Slavery Risks

Our approach to addressing modern slavery reflects the purpose and values that are integral to our business operations. These values are:

- treat each other with respect and dignity;
- respect the law and act accordingly;
- be fair and honest in your dealings;
- be responsible for your actions and accountable for their consequence; and
- be responsible to the community and to the individual.

Our commitment to human rights is supported by an internal governance framework that enables us to effectively identify, assess and address the risks of modern slavery in our operations and supply chains. This includes but is not limited to a number of key Zip policies including its:

- Code of Conduct;
- Whistleblower Policy;
- Supplier Code of Conduct;
- Human Rights Statement; and
- Environmental and Social Policy.

Our **Code of Conduct** sets out the standards of behaviour expected of our directors, senior executives and employees. It supports our commitment to identify and mitigate the risk of modern slavery by outlining our expectations on fair dealings with customers, suppliers and acting with high standards of ethics and integrity. All employees are responsible for complying with our Code of Conduct and receive appropriate training on their obligations.

Our **Whistleblower Policy** empowers our people to feel confident about reporting wrongdoing by fostering a safe, supportive and confidential environment. The policy is underpinned by our values including the need to be responsible to the community and to the individual. This Policy applies to personnel including suppliers, contractors and third parties across all of our operations and sets out an expansive list of reportable matters under the policy, which includes conduct that is unethical, corrupt or a serious risk to public safety and modern slavery. No issues relating to modern slavery or human rights were reported in this reporting period.



Our **Supplier Code of Conduct** is provided to our suppliers and sets out our expectations for the conduct of our suppliers including in respect of modern slavery, labour and human rights. The Code is consistent with International Labour Organisation standards and requires our suppliers to uphold the human rights of workers in their operations and supply chains. This includes expectations with respect to child labour, working hours, wages and benefits, anti-discrimination and humane treatment. We require suppliers to sign our Supplier Code of Conduct on engagement.

In the reporting period, the Supplier Code of Conduct was subject to a review by the Senior Manager, Risk, who was not involved in the initial drafting of the Code. Following the review, the Senior Manager made a number of key recommendations in respect of the content and form of the Code, and its implementation and monitoring. The Code was subsequently updated to include details of environmental management and sustainability, workplace safety, gifts, conflicts and honesty, and data and privacy protection.

Our **Human Rights Statement** recognises the importance of respecting and supporting human rights in our business. It applies to our employees and contractors and covers all areas of our operation. The Human Rights Statement sets out the need to prevent or mitigate adverse human rights impacts and to implement appropriate due diligence processes to identify, prevent and mitigate these impacts.

The **Environmental and Social Policy** outlines our commitments to being an environmentally and socially responsible business and how we intend to manage economic, environmental and social sustainability risks. Under this policy, we set out our strategy to proactively manage the impact of our operations on the environment, as well as our people, customers and community. This includes promoting awareness and good conduct in areas of environmental sustainability, ethical labour practices and working conditions.

During the reporting period, we conducted a yearly review of National Employment Standards (NES) and modern awards. Our ANZ and US People and Culture team also ensure our operations comply with applicable labour, industrial relations and workplace health and safety standards in their respective regions.

### *1. Modern Slavery Working Group and Modern Slavery roadmap*

During this reporting period, our cross-functional and jurisdictional Modern Slavery Working Group (“**Working Group**”) continued to meet to assess the risks of modern slavery, and to develop our modern slavery response as an organisation. The Working Group meets monthly and is composed of members based globally from a wide range of business functions including finance, legal, compliance, financial crime, new markets and representatives of subsidiaries, including ZipMoney Payments Pty Ltd and Zip Co NZ Limited.

During the reporting period, the Working Group continued to focus on a range of modern slavery initiatives, including but not limited to:

- **Assessing effectiveness:** defining what ‘effectiveness’ means in the context of Zip’s modern slavery KPIs and assessing Zip’s performance against the KPIs as set out in our 2022 Modern Slavery statement; and
- **Grievance mechanism:** increasing awareness of the anonymous whistleblower hotline in Zip’s offices and implementing appropriate measures to respond to and investigate any reported incidents of modern slavery through the hotline;
- **Vendor management:** progressing work on vendor management related policies and processes, including allocating resources in Australia and the United States to manage suppliers and develop a supplier questionnaire;

- **Supplier Code of Conduct Policy:** progressing the update of our public facing Supplier Code of Conduct policy and developing our internal framework.

During the reporting period, we have also undertaken a review of our Modern Slavery roadmap and focused on the internal standards and framework governing modern slavery risks.

To date, we have regularly reviewed the initiatives that we have identified through our roadmap to support our modern slavery efforts. The roadmap was developed by the Working Group alongside external subject matter experts and sets out our goals and actions for addressing modern slavery risks for the next year. During this reporting period, we undertook a number of roadmap actions. We:

- performed an operational risk assessment to assess the level of modern slavery risk in Zip's operations;
- performed a modern slavery risk assessment of Zip's high risk and key new suppliers;
- rolled out our Corporate Governance training which is mandatory for all employees including the Board to undertake once a year. The training covers anti-bribery and corruption, modern slavery and conflict management and completion is monitored by our Audit Risk Committee.
- continued to enhance awareness of our whistleblower platform and provided annual mandatory modern slavery training to all employees (except for staff in the United States and Canada as they are not subject to legislation relating to modern slavery).

Our Working Group collaborated to develop our modern slavery response and this joint modern slavery statement. We consulted with subject matter experts (including lawyers specialising in this area) to develop the statement and to reflect our practices and processes.

## *2. Due diligence and remediation*

We are in the process of rolling out a global Vendor Management Policy (“**Vendor Policy**”) to apply to all current and future third party vendors providing services to Zip. The Vendor Policy establishes an ongoing vendor due diligence process (including in respect of modern slavery due diligence). Under the Vendor Policy, we are also rolling out a Vendor Due Diligence checklist (“**Checklist**”) which contains specific modern slavery related questions to allow us to better identify and rate risks of modern slavery in vendors' businesses prior to commencing a business relationship with them.

In parallel, we have also continued to develop a self-assessment questionnaire which will be circulated to certain suppliers. The questionnaire includes questions on whether the supplier has policies in place to address modern slavery risks in their operations and supply chains, how they respond to allegations of modern slavery and the nature of due diligence activities they undertake of their supply chains.

## *3. Governance and Policy review*

We regularly review our internal governance frameworks, as well as our core policies and procedures.

In addition, the Board maintains its focus on risk management and governance, and continues to increase investment in compliance resources and reporting. Further, the

Board is focused on developing a stronger second line of defence to further strengthen the three lines of defence framework and ensure clear lines of accountability. Further detail on our corporate governance can be found in the FY23 Corporate Governance statement on our website.

#### *4. Modern Slavery related clauses*

Where appropriate and possible, we have included key modern slavery related clauses in contracts with our suppliers. The modern slavery clauses impose minimum expectations on suppliers to conduct their businesses in a way that mitigates modern slavery risks in their supply chains.

In circumstances where we become aware that a supplier has breached a modern slavery related term, Zip will seek to enforce contractual mechanisms to compel compliance or to terminate the contractual arrangement.

During the reporting period, we conducted a review of standard modern slavery related clauses in our supplier contracts. In doing so, we confirmed that the clauses remain sufficient since the previous reporting period and so no significant changes were made. Our current clauses include requiring supplier to promptly notify Zip of actual or suspected incidents of modern slavery or human trafficking in their supply chains as well as imposing a requirement on our suppliers to refrain from restricting workers' movements and discriminating against workers when grievances are raised.

We are currently working with our Procurement team to develop a Supplier Compliance Warranty document which will contain clauses we require from all of our suppliers in order for them to adhere to our Code of Conduct.

#### *5. Whistleblower Reports*

At the time of lodging this Statement, no incidents of modern slavery were identified through Zip's whistleblower regime. As noted in our last statement, we implemented an independent whistleblower service, Convercent, which allows officers and employees (including full-time, part-time and temporary), suppliers and associates, as well as relatives, dependents or spouses in all jurisdictions, to anonymously lodge a whistleblower report.

Information about this platform was provided to staff and employees via email and also in compulsory annual training. Finally, to ensure the availability and accessibility of the whistleblower hotline, senior management has communicated to the Zip team how to lodge whistleblower complaints. We have also displayed easy-to-understand posters around global offices with QR codes to the Convercent website.

#### *6. Internal Education & Training*

All employees undertake compulsory compliance training annually, which includes ensuring employees are aware of our internal policies and how to access them. We also introduced compulsory modern slavery training for Australian and New Zealand employees.

The modern slavery training, which was rolled out in June 2022, builds upon knowledge from the previous three years, and includes business specific flags and indicators for identifying risks of modern slavery when onboarding suppliers. This modern slavery training forms part of the induction training program for all new employees and is also required to

me completed annually. It was introduced to increase awareness of relevant policies and procedures that prohibit modern slavery and the implications of the Act for our supply chains.

It is a mandatory requirement that all staff, except for those located in the United States and Canada, complete training on modern slavery annually. The completion of our modern slavery training is incentivised through consideration of its completion for a short-term incentive payment. In Australia and New Zealand the Corporate Governance e-learning training module also covers modern slavery. As at the end of the reporting period, 93% of staff had completed the required training. In addition, our Board received a modern slavery training session on 28 July 2023 from an external expert.

## *7. Risk management*

During the reporting period, we continued to invest and enhance our Risk Management, with particular focus on our core markets in Australia, New Zealand, and the United States. Key activities included:

- adding resources to our Risk Management teams in Australia and New Zealand and the United States;
- monitoring and reporting on the key risks to our business through global and regional risk appetite statements, risk profiles, and business unit specific risk registers;
- conducting cyber security exercises with our management, executive and Board members; and
- reviewing and cementing our Business Continuity Plan and Crisis Management Plan, and increasing our response and recovery preparedness.

## *8. Remediation*

In line with our values and commitments, we confirm that where we become aware of any incidents of modern slavery in our direct supply chain we will take appropriate steps to rectify such incidents in our operations or supply chains. To date, we have not been required to take any such action.

### *Assessing the effectiveness of our response*

We acknowledge that we must be cognisant of modern slavery risks and implement proportionate controls that identify, assess and address modern slavery risks in our operations and supply chains. We are committed to proactively mitigating modern slavery risks in our operations.

During the reporting period, we assessed the effectiveness of our controls through the following actions:

- **Zip Modern Slavery Roadmap:** we continued to review our progress on modern slavery initiatives in our modern slavery roadmap;
- **Vendor management:** we progressed work on vendor management related policies and processes;
- **Training completion rates:** we measured completion rates of modern slavery training by employees; and
- **Modern Slavery Working Group:** our Working Group monitored and oversaw the initiatives set out above, and continued to guide our continuous improvement approach.

We have also developed internal KPIs relating to disclosure of modern slavery risks by reviewing the number of suppliers who complete the self-assessment questionnaire. We also continued to monitor the implementation of policies as well as the number of employees who completed the modern slavery training.

With the support of industry experts, we will continue to refine relevant KPIs. This will ensure that our continuous improvement approach to modern slavery is multi-dimensional and includes both top-down and bottom-up approaches that address our governance, practices and procedures, and extend to our employees and suppliers.

We are committed to engaging and educating our employees and suppliers about the risks of modern slavery, and will continue to do so.

### Consultation

Through the Working Group, Zip has consulted relevant Zip representatives in the development of this statement.

### Next steps

Our modern slavery statement is an iterative document which we review and update annually.

We are committed to proactively mitigating and addressing the risks of modern slavery in our supply chain. Over the coming years, we intend to further strengthen our modern slavery controls by:

- performing an operational risk assessment to assess the level of modern slavery risk in Zip's operations;
- continuing to perform a modern slavery risk assessment of Zip's suppliers;
- refining and rolling out supplier questionnaires for identified high risk suppliers;
- further increasing accessibility and awareness of our anonymous whistleblower hotline; and
- assessing the need for further policy documents focused on responsible and ethical raw material sourcing and responsible purchasing practices.

We also understand that legislative changes, especially in Australia and New Zealand, are expected in the near future and so are keeping up to date with developments to ensure our approach to modern slavery remains effective.