

Domain

Domain Group Modern
Slavery Statement 2020

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This statement (**Statement**) is made by Domain Holdings Australia Limited (**Domain**) and covers the activities of Domain and all of its subsidiaries as at 30 June 2020 (**Domain Group**).

This Statement is Domain's first statement on modern slavery and is being made in compliance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). This Statement covers the reporting period from 1 July 2019 to 30 June 2020 (**Reporting Period**).

The purpose of this Statement is to outline the Domain Group's approach to ensuring that its business is conducted within a framework that minimises modern slavery risks in its operations and supply chain.

Domain recognises that modern day slavery can occur in different ways and can take many forms including slavery (where powers relating to the right of 'ownership' are exercised) and also slavery-like practices including servitude, forced labour and deceptive recruiting for labour or services.

About the Domain Group's business

Domain is a public company listed on the Australian Securities Exchange (ASX) with a total revenue in the Reporting Period of \$281.4 million.

The Domain Group is a leading property technology and services business that is home to one of the largest portfolios of property brands in Australia. The Domain Group's business and services are focused on the Australian property market and the business operates entirely from Australia. The business offers residential and commercial property marketing services via its listings portals on desktop and mobile, and via social media and print magazines.

The Domain Group also provides media and lead generation solutions for advertisers looking to promote their products and services to consumers. The Domain Group creates property market content as well as data and technology services to real estate agencies through property data and research subscriptions, property inspection management tools.

In addition the Domain Group offers home loan and insurance brokerage services, and residential utilities lead generation capabilities.

Domain's largest shareholder is Nine Entertainment Co. Holdings Limited (ASX:NEC), with a 59.3% shareholding. The Domain Group's business consists of Domain and subsidiaries including companies operating the All Homes, Pricerfinder, Homepass, Domain Loan Finder and Domain Insure brands. A complete list of the Domain Group's subsidiaries can be found in Domain's financial statements in its Annual Report for the Reporting Period available at shareholders.domain.com.au. This Statement has been made in consultation with Domain's subsidiaries and is made on behalf of all members of the Domain Group.

Domain has approximately 700 employees who are predominantly based in Australia.

Domain's Commitment to Human Rights

Domain recognises that freedom from servitude is a fundamental human right. Domain respects human rights and is committed to conducting its activities in a manner that supports human rights across all of its operations. Domain's approach to human rights is based on doing business in a way that respects the rights and dignity of people, avoids human rights abuses and upholds applicable legal requirements.

Domain expects high standards of human rights performance across its operations and supply chain. Domain recognises its ability to impact and influence the human rights of a variety of its stakeholders, including in its role as a provider of products and services, as an employer, and as a procurer. Domain is committed to working closely with its stakeholders to identify and understand its impacts, to reduce negative impacts and to enhance positive ones.

The Domain Group's Supply Chain

The Domain Group's supply chain consists of a range of suppliers predominantly supplying goods and services in the following industries:

- ✔ Cloud and software services
- ✔ Advertising and media including media agencies, advertising platforms, social media platforms
- ✔ IT hardware and telecommunications
- ✔ Print services and distribution
- ✔ Data and information services
- ✔ Professional services; legal, accounting, recruitment
- ✔ Building services and office equipment

The Domain Group's material suppliers (determined by value of expenditure) are predominantly based in Australia, the USA and Singapore with a small number in other overseas jurisdictions that are rated low for prevalence of slavery practices in the Global Slavery Index.

The Domain Group's risks of Modern Slavery

Domain considers that the Domain Group's risks of modern slavery practices are low due to the nature and geographic location of its business and its supply chain.

The Domain Group sources goods and services from reputable suppliers located primarily in low risk countries and the nature of the goods and services that it does procure are not typically the type that are at risk of slavery and human trafficking.

The Domain Group's products are primarily online and are all developed within Australia.

Domain's employees are primarily skilled professionals working in Australia. They do not hold roles or positions that are at high risk or vulnerable to slavery or human trafficking. Domain's Employee Experience team have systems and processes in place to ensure that all Domain employees are recruited with the full knowledge of the role that they will undertake, that appropriate checks are undertaken to ensure that employees are over the age of 18 and that employees have the appropriate rights to work in Australia and are paid a reasonable wage for the work that they do.

Domain considers that the Domain Group's risks of modern slavery practices are low due to the nature and geographic location of its business and its supply chain.

Modern Slavery Governance and Processes

Domain has senior leaders who are responsible for human resources, risk and legal compliance. Those senior leaders report to the Chief Executive Officer who in turn reports to the Audit and Risk Committee and the Board.

Domain has formal policies in place (applicable to Directors, employees and consultants) that promote ethically and legally compliant business conduct, both internally and within the supply chain including:

- ✓ Code of Conduct
- ✓ Supplier Code of Conduct
- ✓ Human Rights Policy
- ✓ Speak Up (Whistleblower) Policy
- ✓ Anti-Bribery and Corruption Policy

Domain has an internal team that is responsible for identifying and implementing robust procurement processes and identifying and managing any identified risks within the supply chain as part of the vendor on-boarding process.

Procedures Undertaken in Reporting Period

In early 2019, Domain commenced a review of material suppliers in the Domain Group's supply chain. This included Domain's material suppliers and those material suppliers of Domain's subsidiaries. The materiality was measured by value of expenditure and covered 40 suppliers that collectively represented approximately 80% of the procurement expense of the Domain Group.

Domain undertook the risk assessment based on certain criteria including:

- ✓ the supplier's country of registration
- ✓ the types of services and industry
- ✓ feedback supplied by Domain's own staff (including from physical inspections of the supplier's premises)
- ✓ whether the supplier has a published statement on modern slavery

any other readily available public information.

As a result, Domain was able to identify suppliers that were considered no or low risk. The risk assessment also identified suppliers that fell into potentially higher categories of risk and further assessment was then conducted in respect of those suppliers.

In June 2019, Domain adopted a new Supplier Code of Conduct (**Supplier Code**). The Supplier Code is available on Domain's website at sustainability.domain.com.au. The Supplier Code was sent by email to all suppliers in June 2019. Suppliers were asked to take the time to read and familiarise themselves with the Supplier Code and encouraged to contact Domain if they had any concerns or were unable to comply with the Supplier Code for any reason.

Domain undertook a further email campaign in December 2019 and again in June 2020 to all suppliers new to the Domain Group to ensure that they were aware of and familiar with the terms of the Supplier Code and Domain's expectation that they were required to comply with it.

Since May 2020, the delivery of the Supplier Code to new suppliers has been automated through Domain's self-serve Vendor Portal. As part of the set-up process, new suppliers are now asked to identify whether they are unable to comply with the Supplier Code, which triggers a manual review process of the relevant vendor.

Domain considers the overall approach adopted in FY20 was effective in identifying and addressing potential modern slavery risks in Domain's supply chain.

Ongoing Monitoring and Auditing

The Domain Group is committed to maintaining an ongoing dialogue with its vendors on modern slavery. Domain is proposing to undertake bi-annual monitoring and spot-check assessments of existing suppliers to the Domain Group, as well as undertake risk assessments of new material suppliers that are on-boarded into the Domain Group's supply chain.

Next Steps

The Domain Group recognises and understands the importance of the Modern Slavery Act and is committed to reviewing and assessing the risks in its supply chain. Over the course of the coming reporting period (the period from 1 July 2020 to 30 June 2021), the Domain Group will continue to review its supplier arrangements and procurement processes to ensure continued compliance with the Modern Slavery Act.

This Statement has been approved for release by the Domain Board of Directors and is available on Domain's website at shareholders.domain.com.au.

Jason Pellegrino
CEO and Managing Director