

MODERN SLAVERY STATEMENT

Reporting Period

1 July 2020 - 30 June 2021

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PART ONE

Executive Summary

01. Mutual Marketplace Pty Ltd is a reporting entity under the *Modern Slavery Act 2018 (Cth)* (the Act). Our second mandatory reporting period concluded on 30 June 2021.
02. Mutual Marketplace accepts that, like all global businesses of a certain scale, the incidence of modern slavery deep within its supply chains is likely an unfortunate reality, rather than some theoretical notion.
03. We are committed to a long-term effort to diminish modern slavery from its supply chains and operations. To that end, it has engaged and has worked closely with, subject matter experts on modern slavery over the course of 2019-2021. We consider this to be an important component of our broader corporate social responsibility and human rights obligations.
04. Mutual Marketplace recognises that the efforts and measures defined in this Statement are the initial recognized phases, since the introduction of the Act, in its targeted efforts to carry out uniform and evidence-based modern slavery remediation. What is contained in this Statement is not put forward as the attainment of an end goal in itself but rather a roadmap to build upon the encouraging early steps that are underway.
05. In addition to meeting the specific legal reporting requirements under the Act, this Statement sets out Mutual Marketplace's methodology, key findings and planned framework for future action during upcoming reporting periods in relation to modern slavery risk identification and remediation.



PART TWO

Methodology and Outline of Specific Legal Requirements

06. Throughout the reporting period, Mutual Marketplace has undertaken a number of key steps to identify and address the key modern slavery risks in its supply chain. These include:
 - a. *Second round of Risk Assessments*
 - b. *Identification of Suppliers for Further Modern Slavery Risk Assessment*
 - c. *Policy and Contract Review and Update*
 - d. *Continued Internal Education and Training*
 - e. *Updating of our Standard Purchase Order Terms and Conditions*
7. Pursuant to government guidelines, this Statement also addresses evolving matters in relation to the impact of the COVID-19 global pandemic on modern slavery risks, and how those risks are to best be identified and remediated in the current period of unprecedented change and uncertainty.

Acknowledgment of formal legal requirements

08. Mutual Marketplace is a joint venture between Great Southern Bank (GSB) and the Australian Credit Union Ltd (trading as People's Choice Credit Union), with each entity holding a 50% share. This Modern Slavery Statement is separate to the Statements that are to be lodged by those separate corporate entities, which are reporting entities under the Act. The reporting period for Mutual Marketplace is 1 July 2020 to 30 June 2021.

Identify the reporting entity

09. Mutual Marketplace Pty Ltd: ABN 35 615 297 820 / ACN 615 297 820.

Describe the reporting entity's structure, operations and supply chains

10. Mutual Marketplace is a provider of procurement, shared service and accounts payable services for the Australian credit union industry. Created by the industry for the industry, our mandate is to optimise procurement opportunities, apply best practice and deliver savings for the benefit of all members. We exist to ensure credit unions are able to grow and thrive in an increasingly complex, competitive and diverse marketplace.
11. Mutual Marketplace provides the following services:
- a. **Procurement Strategy and Planning:** Assess the credit union environment, perform spend analysis, idea generation and opportunity identification, set goals and objectives.
 - b. **Category Planning:** Profile category, create category strategy, define, assess opportunities and prioritise sourcing events with stakeholders.
 - c. **Category Development:** Mobilise, improvement initiative, compliance initiative, strategic sourcing initiative, implement.
 - d. **Category Management:** Managing issues relating to demand, supply, savings and compliance, manage supplier (contract), project-based sourcing.
12. Mutual Marketplace has offices in Brisbane and Adelaide.

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns and controls

13. A summary of Mutual Marketplace's processes for identifying the main risks of modern slavery in its supply chains is set out in Part 3 of this Statement.

Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.

14. In addition to the ongoing Risk Assessments, Mutual Marketplace has taken the following key actions to assess and address these risks:
- Identification of Suppliers for Further Modern Slavery Risk Assessment
 - Template Contracts updated.
 - Continued Internal Education and Training.
 - Implementation of the Corporate Social Responsibility policy and framework, which includes Modern Slavery.

Describe how the reporting entity assesses the effectiveness of these actions

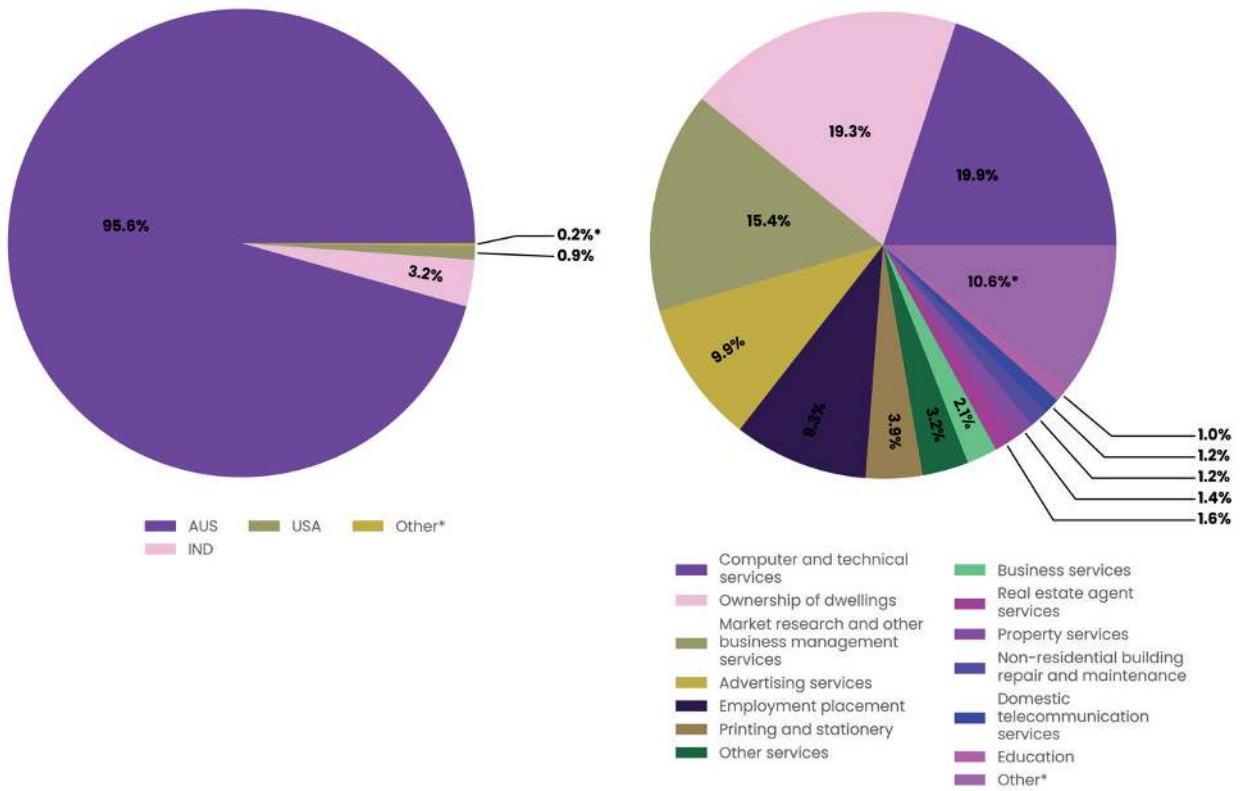
15. Mutual Marketplace has implemented a Measuring Effectiveness Framework to provide a framework for the ongoing evaluation of its response to modern slavery.
16. Mutual Marketplace has formed a modern slavery working group consisting of the General Manager, General Counsel and the accounts payable and procurement team.



PART THREE

ONGOING RISK ASSESSMENT

17. The key purpose of Mutual Marketplace's risk assessment was to identify the areas of likely greatest modern slavery risk in Mutual Marketplace's supply chain. This reference point exercise has enabled Mutual Marketplace's to focus on its ongoing modern slavery due diligence and remediation activities.
18. Incorporating company data throughout global markets, Mutual Marketplace has utilised the proprietary technology of SEDEX to trace the inputs required to produce products and services sourced from Tier 1 suppliers to Tier 10 suppliers of the supply chain of Mutual Marketplace's suppliers.
19. The information obtained in the Assessment was for purposes of risk identification under Section 16(1)(c) of the Act. No information confirms the actual existence or non-existence of slavery in Mutual Marketplace's supply chains or operations. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.
20. A summary of the results of some of the data analysis and other key components of the Initial Assessment is set out below.

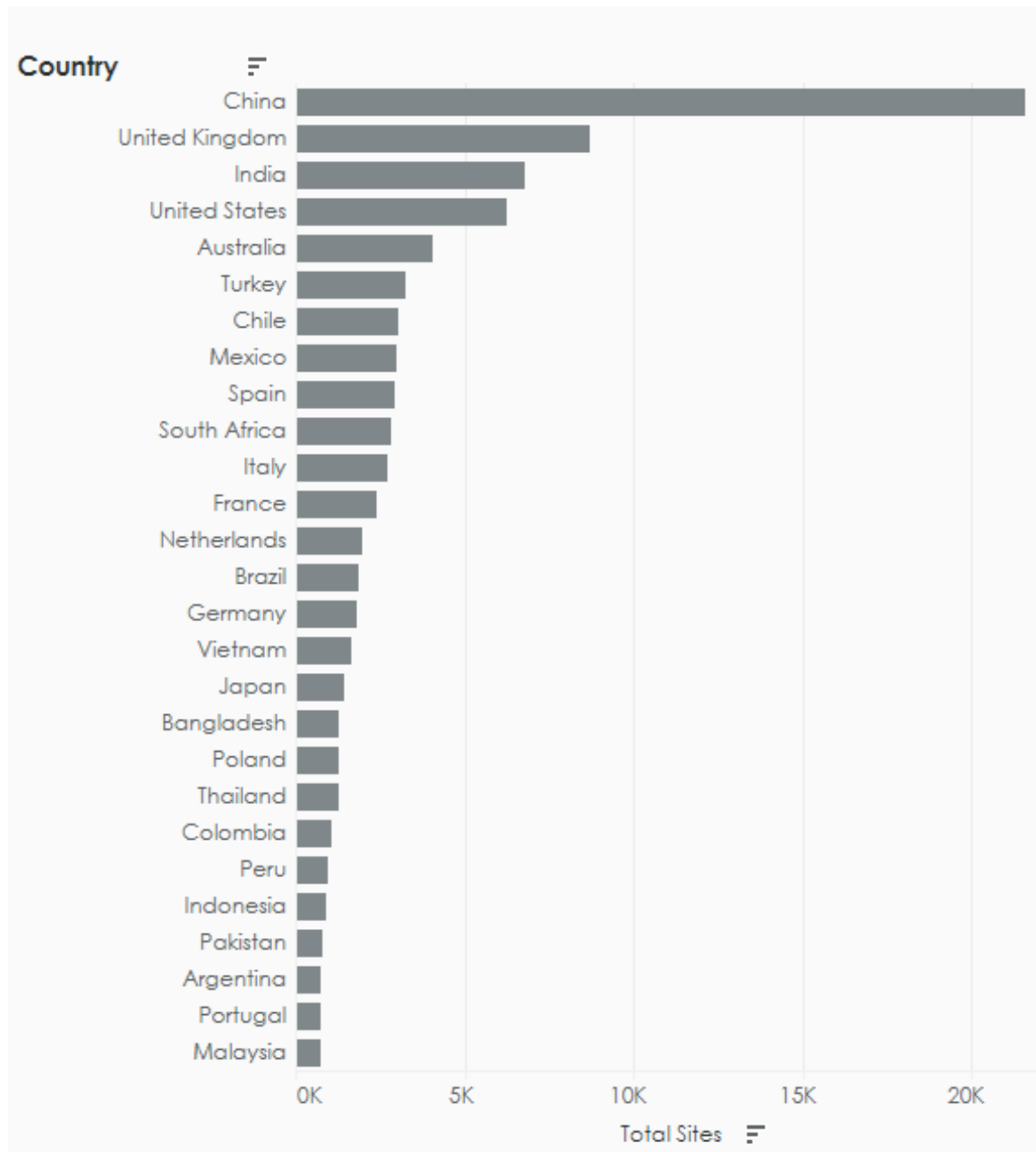


Supply Chain Mapping

21. This dashboard highlights the non-compliance breakdown by country, darker shaded countries showing higher non-compliance than lighter shaded countries.

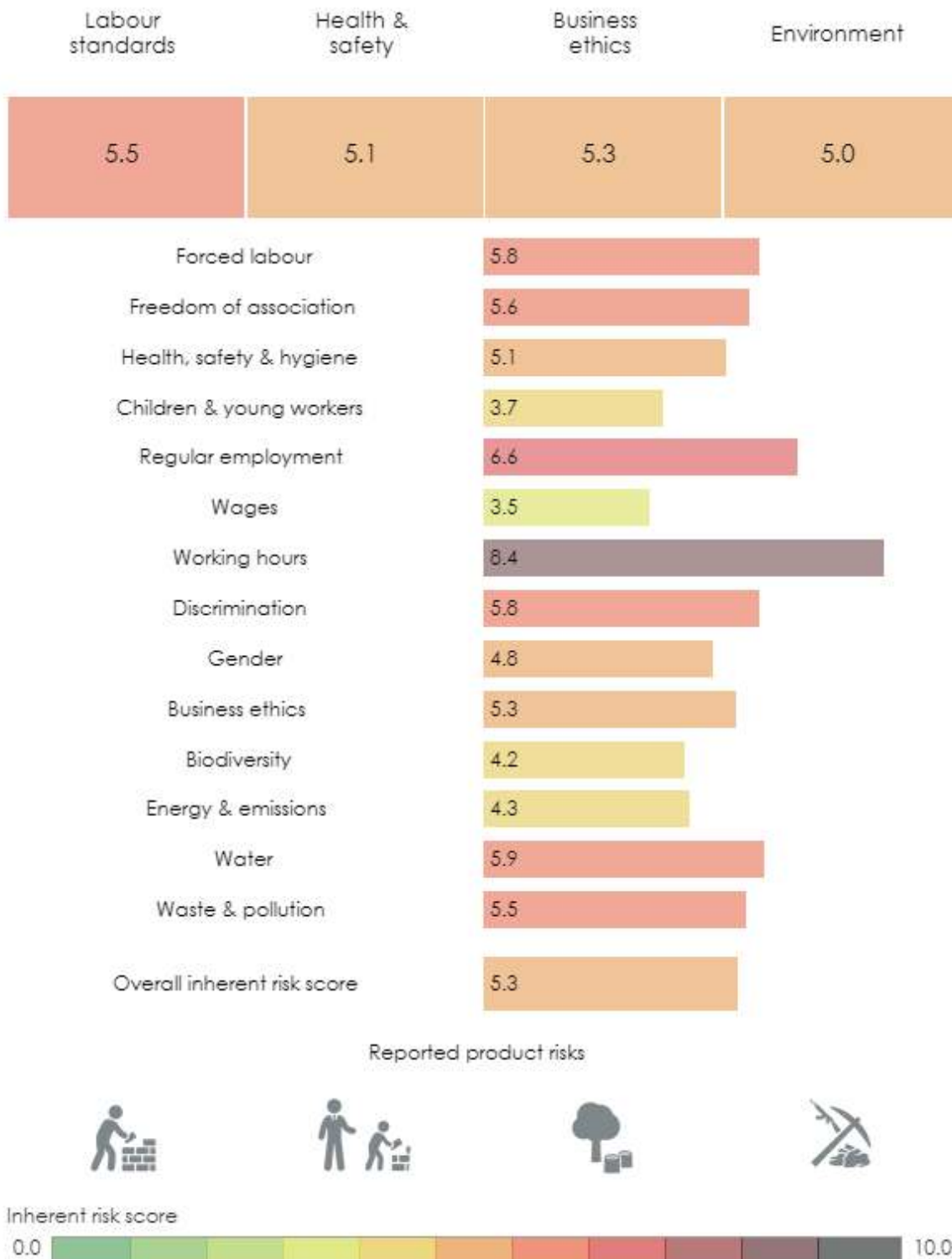


22. This graph highlights countries in order of non-compliance.

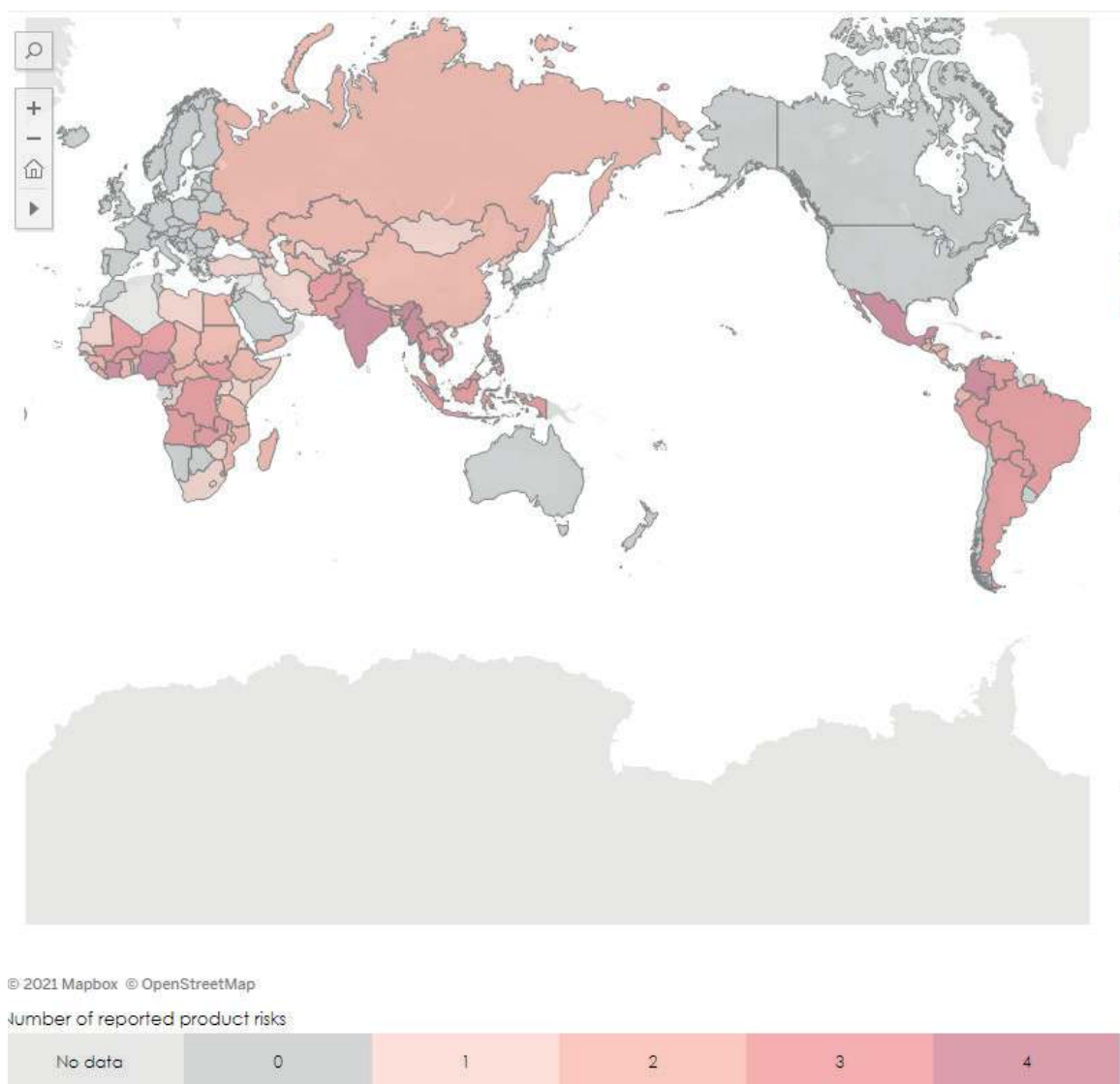


Modern Slavery Risks by Tier of Mutual Marketplace’s Supply Chains

23. Over the whole supply chain, the analysis indicates that the highest likelihood of slavery is occurring in India. Using a 1-10 rating scale with 10 being the highest risk. In the graphs below the IT & Communications services have been measured to understand the level or risk with this industry and geography.



24. This next overview reports the number of reported product risks



25. Further information in relation to the Assessment process and methodology, including Data and Complete Supplier engagement reports are available upon request, if required for the purposes of ensuring compliance with the Act.

PART FOUR

POLICY AND SUPPLIER CONTRACTS REVIEW

26. Mutual Marketplace has undertaken a comprehensive update of its internal governance policies so as to specifically address its modern slavery risk.
27. The key policies that have been incorporated into Mutual Marketplace's existing suite of policy documents include the following:
 - a. Provisions addressing modern slavery in all new supplier contracts.
 - b. Inclusion of Modern Slavery into the Corporate Social Responsibility Policy.



PART FIVE

INTERNAL EDUCATION AND TRAINING

28. Mutual Marketplace's employee education and training on modern slavery risks within its supply chains and operations is an important component of its risk and remediation strategies.
29. By increasing the level of formal knowledge and training regarding the risks of modern slavery, Mutual Marketplace will be more effective in its ongoing commitment to the elimination of such practices in its supply chains and operations. The education program has involved the following modules; a. introduction; identifying modern slavery risks in operations and supply chains; due diligence, addressing modern slavery through supplier engagement; remediation; and measuring effectiveness.
30. The internal awareness raising efforts have primarily been in the form of face-to-face training with appropriate staff members from Mutual Marketplace.



PART SIX

MEASURING EFFECTIVENESS FRAMEWORK

31. Mutual Marketplace acknowledges that the most practically effective and appropriate method of modern slavery due diligence and remediation in an Australian context is still very much in a developing state.
32. Mutual Marketplace is assessing the nature and extent of modern slavery risks with the aim of prioritising risk mitigation and situation specific responses. The categorisation methodology is based upon whether a particular identified modern slavery risk has been caused by (most direct link), contributed to, or linked with (least direct link) Mutual Marketplace's direct business activities. Given the nature and geographic location of Mutual Marketplace's core business activities, it is inevitable that the majority of risks will lie within the latter categories. However, despite posing specific challenges, Mutual Marketplace does not consider that this means there is lesser obligation, as part of our objectives, to vigorously seek to measure the effectiveness of our modern slavery risk assessment and remediation activities.

33. The following Table summarises Mutual Marketplace's Measuring Effectiveness Framework.

CATEGORY	NATURE OF INVOLVEMENT	APPROACH FOR REMEDIATION
Caused	Mutual Marketplace's own acts or omissions and decisions, without contribution from others, caused the harm.	Immediately cease or prevent the action/omission causing the harm and provide appropriate remediation (ie via Mutual Marketplace's Grievance Resolution Policy).
Contributed	Mutual Marketplace has incentivised or facilitated the harm, alongside another entity or through another entity. In all cases of contribution, the contribution must have made the harm more likely and must not be trivial.	Immediately cease or prevent the action, using leverage to mitigate the risk that any remaining impact continues or recurs. Play a direct role in remediation of the harm, sharing responsibility in it. Use third party mediator if companies cannot agree.
Linked	Mutual Marketplace has not caused or contributed to the harm but there is still a direct link between Mutual Marketplace's operations and the harm via a business relationship. There is no need for an immediate relationship; the link may be beyond the first tier of business relationships.	Use leverage to mitigate the risk of the impact continuing or recurring to the greatest extent possible. Mutual Marketplace may also play a direct role in remediation if it wishes.

PART SEVEN

COVID-19 PANDEMIC IMPACT ON SUPPLY CHAINS AND LINK WITH MODERN SLAVERY RISK

Mutual Marketplace acknowledges the impact that COVID 19 has had on its supply chain's most vulnerable workers. The effect of COVID 19 has meant that Mutual Marketplace evolved its operating rhythm to enable the successful management of our Modern Slavery obligations despite remote working.

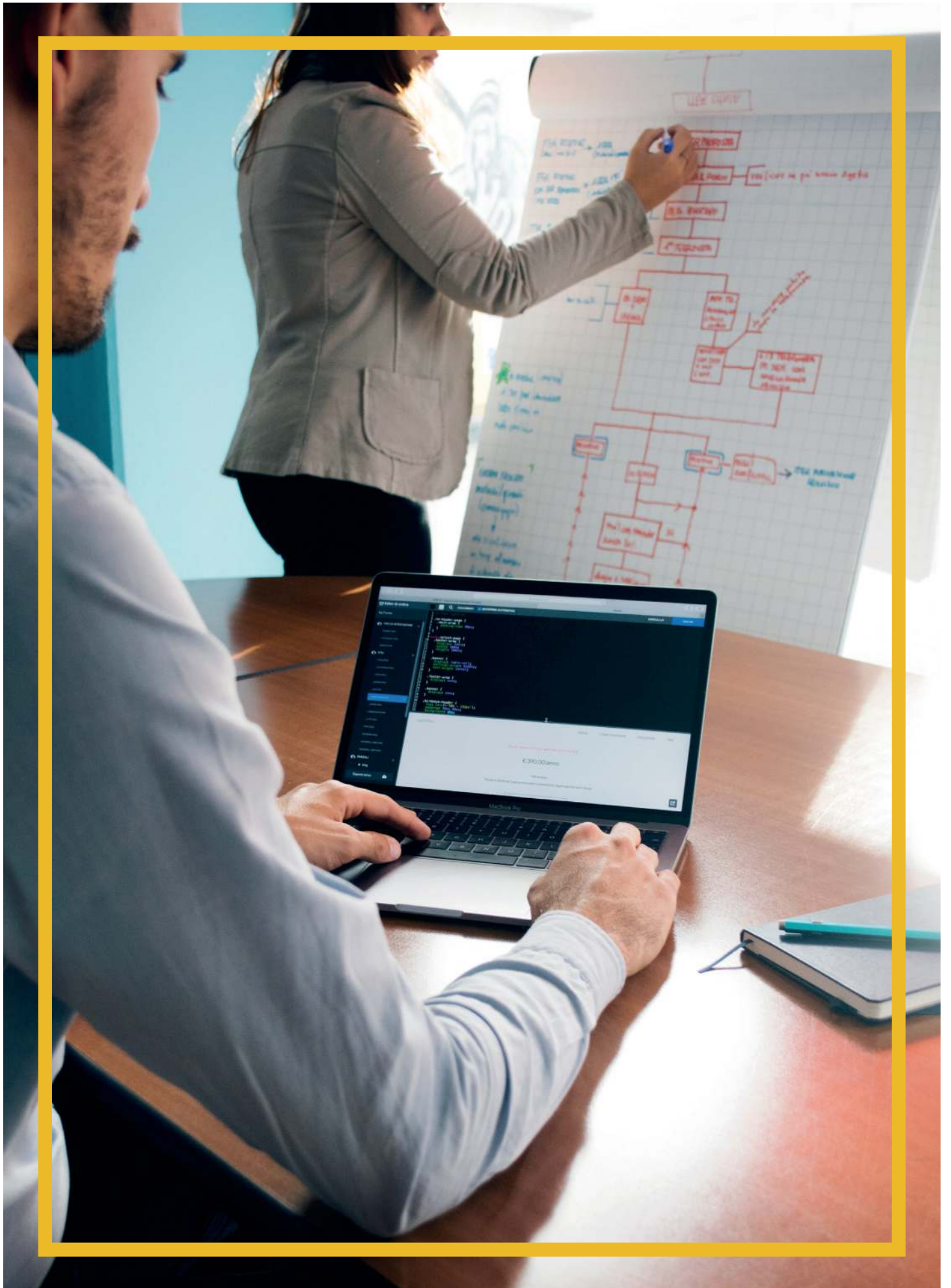


PART EIGHT

NEXT STEPS FOR MODERN SLAVERY RISK ASSESSMENT AND REMEDIATION

In relation to Mutual Marketplace's next steps for modern slavery risk assessment, Mutual Marketplace became a member of SEDEX. Mutual Marketplace intends during the next reporting period to undertake all supplier audits and questionnaires through Sedex to operationalise due diligence of modern slavery risk.

Mutual Marketplace is exploring implementing the Risk Management module with SAP Ariba, which will enable greater risk management of its supply chain, including improved Risk Assessment compliance when onboarding new suppliers.



PART NINE

CERTIFICATION AND STATEMENT OF CONFORM

This statement was approved by the Board of Mutual Marketplace Pty Ltd.



Steven Chugg

Director



Vincent Pace

Director





CONTACT

T: 1300 030 935

W: mutualmarketplace.com.au

E: info@mutualmarketplace.com.au

BRISBANE OFFICE

Level 3, 127 Creek Street,

Brisbane QLD 4000

ADELAIDE OFFICE

c/- People's Choice Credit Union

Level 13, 50 Flinders Street,

Adelaide SA 5000