VIRIDIAN FINANCIAL GROUP

MODERN SLAVERY STATEMENT

Document Owner	Board
Approval date	2025

Introduction

As an Australian entity with a consolidated revenue of over $100 million, Viridian Financial Group Limited and its subsidiaries (the Viridian Group, us, we, ours) is a reporting entity under the Modern Slavery Act 2018 (Cwlth) (the Act). As a reporting entity, the Group is required to prepare and lodge an annual modern slavery statement with the Minister of Home Affairs within 6 months of the end of the financial year that is:

- Compliant with the mandatory content requirements set out in section 16 of the Act,
- Prepared in the correct form for the minister to approve,
- Approved by the Board of the Viridian Group, and
- Signed by joint CEOs.

This modern slavery statement sets out the risks of modern slavery in the Viridian Group's operations and supply chains and provides information about the actions taken to address those risks. This statement has been approved by the Viridian Group Board of Directors.

The Viridian Group recognises the importance of addressing modern slavery both within its operations and in its supply chain and is committed to ethical practices.

Business Operations and Supply Chains

The Viridian Group is a financial services company committed to improving Australians' financial security through quality advice, advanced technology, and innovative solutions, while actively supporting local communities.

Structure and Operations

The Group operates the following wholly owned subsidiaries:

- Viridian Financial Group Pty Ltd,
- Viridian Advisory (VA),
- Infinity Capital Solutions (ICS),
- Enlightened Financial Services (EFS), and
- Smartmove Professional Mortgage Advisors (Smartmove).

The Group also owns 50% of Cornerstone Super Solutions Pty Ltd (ACN 156 560 002).

Our senior management team comprises of the Viridian Group's Joint CEOs, the Chief Financial Officer, Chief Risk Officer, General Legal Counsel, Chief Sustainability and Operations Officer, and Company Secretary, Joint General Managers Advice, General Manager Solutions, General Manager Lending, Chief Investment Officer.

The Group employs approximately 450 staff across Australia, as well as internationally in the Philippines and Nepal and holds international operations via outsourced agreements in Ukraine, Nepal, and Philippines.

Viridian Advisory (VA) is the financial advice business of the Group and is made up of over 100 financial advisors across Australia. This includes a network of self-employed financial advisors.

Enlightened Financial Services (EFS) - Acquired by VFGL in 2023, EFS is a provider of financial advice services, comprising of financial advisors based in Queensland, Australia.

Infinity Capital Solutions (ICS) - is the solutions arm of VFGL. The ICS business provides institutional-grade solutions that includes retail and wholesale investment solutions as well as fintech and client engagement tools.

Smartmove - is the lending arm of VFGL, comprising of brokers across Australia. Smartmove provides residential, investment and commercial lending services.

Cornerstone Super Solutions – is a specialist provider of Self-Managed Super Fund services.

Investments

IAM's approach to investing integrates sustainability, considering environmental, social, and governance (ESG) issues as part of our fundamental research process. We use corporate sustainability reports, management meetings, external resources, and personal judgment to develop our proprietary Sustainability thesis, benchmarked to the UN Sustainable Development Goals.

ESG also forms a core component of our manager research. We review each manager from a sustainability perspective and expect that all managers who are potential candidates for portfolio inclusion be a signatory to the UN Principles for Responsible Investment (UNPRI).

Governance

The Viridian Group is governed by its Board, responsible for setting strategic direction, providing leadership, supervising management, and reporting to members within the legal context.

It contributes to the effectiveness and efficiency of our organisation. It promotes development, responsible conduct, transparency, clarity and stakeholder confidence.

To assist the Board's decision making, supervision and control of the organisation a number of Board committees support the Board's governance namely, Board Risk Committee (BRC), Governance and Remuneration Committee, and Audit Committee are maintained.

The BRC is responsible for recommending risk appetite to the Board and overseeing the management of risk throughout the organisation.

Supply Chains

The Viridian Group relies on several suppliers and vendors, primarily based in Australia, to enable successful business operations. Our supply chains include technology infrastructure, office services, professional services, and travel services. The Viridian Group will not knowingly support and/or conduct business with any suppliers or vendors who are involved in slavery.

The majority of VFGL's suppliers and vendors are based in Australia, with a small number in of suppliers engaged in Ukraine, Nepal, and Philippines.

Risk Assessment and Management

VFGL is committed to upholding the highest standards of ethical conduct and human rights in our operations and supply chains. The following principles guide our management of Modern Slavery risk:

- Zero Tolerance,
- Due Diligence,
- Transparency and Accountability, and
- Continuous Improvement.

To identify and manage the risk of Modern Slavery in our business operations and supply chain, we have implemented the following policies and procedures:

- Code of Conduct,
- Supplier Code of Conduct,
- Whistleblowing Policy, and
- Third Party and Vendor Management Policy

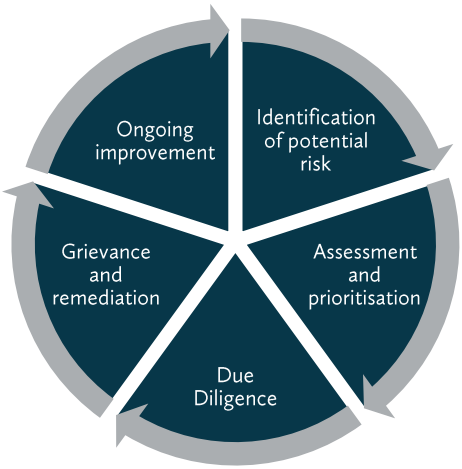
A Modern Slavery risk assessment was completed in February 2025, and focused on the four key modern slavery risk factors:

- Vulnerable Populations,
- Business model structure, and high-risk workplaces, including supply chain complexity,
- Products and services, and
- Geographical areas.

Overall, the exposure to Modern Slavery risk in VFGL is low (Australia) to medium (International Operations). Downstream, the services that are provided have a very low risk profile given the jurisdiction being predominantly limited to Australia with some offshore operations. Upstream, our third-party service and product providers (including investments) required further mapping and review to assess the risk of exposure to Modern Slavery.

Recommendations outlined in the Risk Assessment have been prioritised and are being tracked for completion.

Actions Taken to Address the Risk of Modern Slavery



The Group has become a reporting entity for the first time in 2025. The following actions were prioritised for the year:

Area	Action Taken in 2025
Governance	A Modern Slavery Working group was formed to support the completion of activities required to meet our obligations under the Modern Slavery Act.
	Modern Slavery Reporting to the Board and the Board and Risk Committees providing regular updates with regards to work completed and actions taken to manage the risk.
Policies and Procedures	Drafting and operationalising Modern Slavery Policy.
	Finalising and commencing work to operationalise the Third Party and Vendor Management Policy.
	Updated our Whistleblower policy to include reference to reporting suspected instances of Modern Slavery.
Risk Assessment	An assessment of Modern Slavery risk was completed. The Group's exposure was deemed 'Low' overall. Opportunities for improvement identified and recommended with actions prioritised.
Supply Chain	Identified our material suppliers and investment managers, rating their exposure to Modern Slavery risk based on the following criteria: • Vulnerable Populations, • Business model structure, and high-risk workplaces, including supply chain complexity, • Products and services, and • Geographical areas. This allowed for the prioritisation of suppliers and investment managers for further review and engagement.

Area	Action Taken in 2025
Supply Chain (Cont.)	Engagement with prioritised suppliers and investment managers has taken place with responses reviewed and where opportunities were identified, further engagement planned.
	Drafting a clause to address Modern Slavery risk for our third-party contracts.
	A supplier code of conduct was drafted.
Awareness and Education	We have sourced and provided awareness training to key staff who are involved in the management of supply chain with the view of providing refresher training periodically.

Managing Modern Slavery risk is an ongoing, iterative process that is focused on continuous improvement. The following articulates our key area of focus for 2026:

Area	2026 Commitments
Governance	Continue the working group as we continue to operationalise the policies and procedures that support our organisation in the managing of Modern Slavery risk.
	Continue to provide Modern Slavery Reporting to the Board and the Board and Risk Committees on at least a quarterly basis.
Policies and Procedures	Continue activities to operationalise the Third Party and Vendor Management Policy.
Risk Assessment	Continue to address the opportunities identified towards continuous improvement in the management of Modern Slavery risk.
Supply Chain	In 2026 we will continue to focus on identifying further opportunities to engage with our suppliers.
Awareness and Education	We will continue to focus on providing training and awareness to our key staff as well as commence work on providing training and awareness to our suppliers.

Due Diligence Processes for Slavery and Human Trafficking

The Viridian Group has number of processes, both implemented and in development that support the identification and mitigation of the risk of Modern Slavery in our supply chains and assess the effectiveness of these processes. These include:

- Due diligence in the on-boarding and ongoing management of third-party suppliers and vendors,
- Supply chain mapping, and
- Assessment of Modern Slavery risk in our supply chain

Responding to Modern Slavery

At Viridian we are committed to addressing and mitigating the risks of modern slavery within our operations and supply chains. To effectively respond to modern slavery risk, the group has the employed the following measures:

- Policies and Procedures,
- Risk Assessment,
- Supplier Engagement,
- Training and Awareness, and
- Monitoring and Reporting.

Where the Group becomes aware of instances of Modern Slavery whether it is within its own operations or in its supply chain, it will respond quickly, efficiently and collaboratively.

By implementing these measures, we aim to create a safe and ethical environment for all individuals involved in our operations and supply chains. We are committed to continuously improving our efforts to combat modern slavery and ensure the highest standards of ethical conduct and human rights.

Assessing the effectiveness of actions

To assess the effectiveness of our actions in managing modern slavery risk, we employ the following measures:

- Review of our supply chain due diligence outcomes,
- Tracking completion rates for staff awareness training, and
- Review and analyse any incidents that are raised, conduct root cause analysis, identify opportunities for improvement,

Through these measures, we ensure we are responsive and aligned with our commitment to eradicating modern slavery from our operations and supply chains.

Consultation and Approval

Consultation of this statement was undertaken with representatives across the business. This statement has been approved by the Board of Directors and the Viridian's Group Joint CEOs.