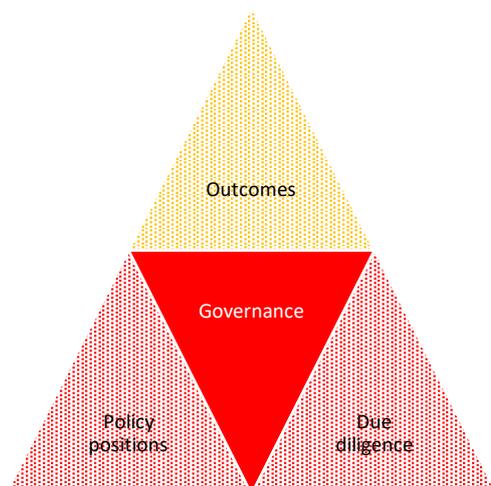


## HUB24 YEAR 1 REPORT FINANCIAL SERVICES HUMAN RIGHTS BENCHMARK

Company Name	HUB24 Limited
Industry	wealth management solutions
FY end	30 June 2019
Revenue FY19	\$98.668m
Employees	not disclosed
Retail divisions	Hub24CS (wholly owned subsidiary of Hub24Ltd)
CLIS divisions	Platform, Licensee (we note Paragem discontinued from 1 February 2021), IT Services (Agility)
Law reform contributions	not in our sample
Overall level of disclosure	Limited disclosure

Our overall rating of HUB 24's human rights performance for each domain is set out below.



### RETAIL: RED

HUB24 does not manufacture products. Hub24 Custodial Service issues a financial services guide which is one indicium of a retail client relationship. It operates an internal complaints handling policy and is a member of AFCA. However retail clients only gain access via an adviser.

HUB24 is the smallest company in our sample. Its level of disclosure is limited and we were unable to find many of the documents we use to analyse aspects of its human rights governance, policy positions and due diligence processes. Our scoring reflects the inferences we can draw from the information available.

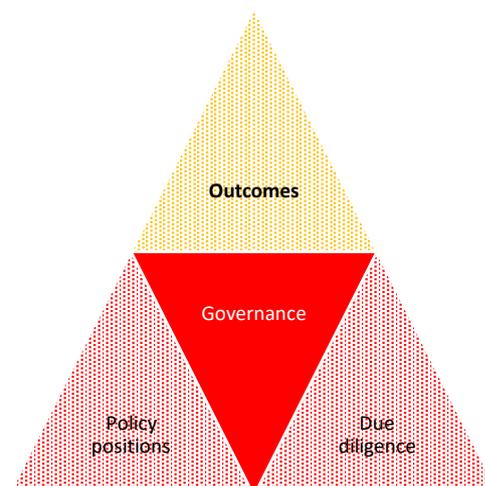
We observed that HUB24 scored well on some of our outcome indicators but, with the absence of information about internal processes that only HUB24 can disclose, our scoring reflects this state of affairs.

### COMMERCIAL LENDING INVESTMENT AND SERVICES (CLIS): RED

HUB24 offers commercial services to two commercial client groups.

One commercial client group comprises fund managers whose products are listed on HUB24's platform. There is no information to allow us to analyse what steps, if any, that HUB24 takes to ensure that it does not cause nor contribute to human rights impacts through these relationships.

The other commercial client group comprises advisers whose recommendations to their clients include managed funds and other products available on HUB24's service. We note commentary that 'Wexit' has provided opportunities for advisers to align with independent platforms such as HUB24. Advisers could be individuals or SMEs, with the potential for human rights impacts on the natural persons involved in those relationship. There is also the prospect of contributing to human rights impacts on the advisers' clients.

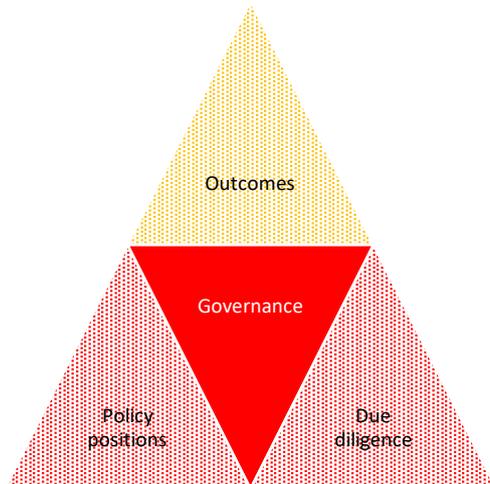


This report is presented for the purpose of disseminating information and research findings for the benefit of the public. It has been prepared on the basis of evaluation of human rights performance based on publicly available material for the 22 ASX listed entities included in the sample.

The University of Sydney ("University") makes no representations or warranties as to the accuracy, completeness, or reliability of the information contained in the report, and accepts no legal liability whatsoever arising from, or connected to, the material contained in this report.

The information contained in this report is not intended to constitute legal, tax, financial or investment advice and nothing in the report is intended to imply any recommendations or opinions. The University recommends that users make their own independent judgements or seek independent advice with respect to the information contained in this report.

# HUB24 YEAR 1 REPORT FINANCIAL SERVICES HUMAN RIGHTS BENCHMARK



## EMPLOYEES: RED

HUB24 is one of the smallest FSEs in our sample by revenue. It does not disclose details of its employee numbers in its FY19 documents. HUB24 was not a WGEA reporter in FY19, from which we infer that it had fewer than 100 employees over a six month period during the year.

While its remuneration report provides insight into the key management personnel (board and particular senior executives), its periodic reporting does not offer much insight into the governance, policy positions and due diligence it undertakes with respect to the employees that it does have. Its disclosure of various policy documents relating to employees is also limited.

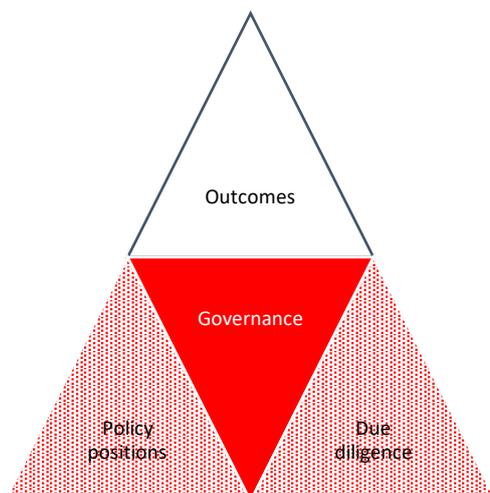
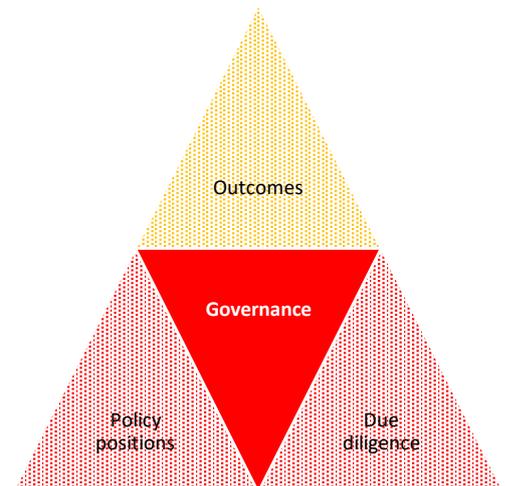
We note commentary in the 2019 Annual Report of a company-wide culture and organisational health survey. We further note the commentary in 2020 Annual Report on the outcomes of that survey but have yet to see more concrete details of any resultant changes.

## SUPPLIERS AND SUPPLY CHAIN: RED

There is no indication in the 2019 Annual Report or other documents of any consideration of the human rights risks arising from its relationships with suppliers or via its supply chain.

As at the date of this report, we could not find a Modern Slavery Statement for FY20, nor could we find mention of this statement in HUB24's 2020 Annual Report.

We note from its own cash flow statements that payments of \$91.2 million to suppliers and employees (shown as a lump sum) constitute the largest cash flow out from its operating activities, with cash inflows from customer receipts of \$102.18 million. Given the level of employee expenses reported in the annual report at note 6, there is a significant supplier spend, relative to size, so it is likely that some human rights risk exists along its supply chains.



## SOCIETY: RED

There is no recognition at Board level of public policy advocacy as a source of human rights risk. Thus we infer there is unlikely to be any consideration of this source of risk via appropriate governance of human rights risk and, likewise, we also infer the absence of appropriate policy positions supported by a feasible due diligence process.

HUB24 did not make submissions to the law reform inquiries considered as part of our year 1 study.