

MODERN SLAVERY POLICY

Purpose

To document the our commitment to the *Modern Slavery Act 2018* (Cth) (the **MS Act**), which is optional for us to adopt but which we have chosen to do so.

PROCEDURES - THE REPORTING OFFICER MUST TARGET THAT:

- 1 The provisions of the Modern Slavery Policy are reviewed on a regular basis, and in any event at least annually.
- 2 All applicable employees complete Modern Slavery training.

Overview and Purpose

The purpose of the Modern Slavery Policy Rule is to detail the procedures which we follow to meet the requirements under the *Modern Slavery Act 2018* (Cth) (the **MS Act**).

We are committed to continually improving our systems and processes to combat slavery and human trafficking. We understand the risks of modern slavery to mean the potential for our business to cause, contribute to, or be linked to modern slavery through our operations and supply chains.

We recognise that particular types of suppliers (e.g. those employing lower-wage staff) may represent a higher risk of modern slavery and human trafficking. We also understand that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude and workplace abuse. Therefore, in this statement we will use the terms "slavery and human trafficking" to encompass these various forms of coerced labour.

We acknowledge that have a responsibility to respect human rights and will take action to prevent, mitigate and where appropriate remedy modern slavery in its operations and supply chains. As part of that action, we have adopted a Modern Slavery Policy to support the elimination of modern slavery in Australia and internationally.

This Policy Rule details the processes and procedures identified in our Modern Slavery Statement (**Statement**).

OVERVIEW OF THE MODERN SLAVERY ACT REQUIREMENTS

- We will not commence commercial arrangements with entities that breach the UN Guiding Principles on Business and Human Rights (UN Guiding Principles). It will also comply with the UN Guiding Principles when making investment decisions.
- We will target that staff are trained on the MS Act and are aware of its requirements. If we procure goods above \$10,000 in value, it should assess whether the supplier has complied with the MS Act, otherwise, we will assess alternative suppliers.

Structure, Operations and Supply Chains

The risk of us being exposed to modern slavery risks within its supply chain is low. In providing financial services, our expenses are predominantly staff costs, rent and other professional

services that have been procured in Australia. The financial services business operates in Australia, and we seek suppliers that have similar values, ethics and sustainable business practices, including those related to human rights.

For the indirect risks, our investment decisions are made with consideration of modern slavery risks and ensuring investments are aligned with the UN Guiding Principles.

Board Monitoring and Approval

We will target that the requirements detailed above in 'Overview of the Modern Slavery Act Requirements' are fulfilled. Additionally, we will provide the Board with an annual assessment on the implementation of the obligations of this Policy Rule as well as the Statement. The Board shall consider the effectiveness of the measures described above and amend the statement as it sees fit.