

## MODERN SLAVERY POLICY

### Overview and Purpose

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

Whilst the provisions of the MS Act are optional for us (as we do not have revenue of \$100 million), we chose to comply with it.

We acknowledge that we 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 this Modern Slavery Policy based on the goal of our Board, senior management, employees and shareholders to support the elimination of modern slavery.

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 ensure 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 be assessed 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 this 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 ensure that the requirements detailed above are fulfilled. Additionally, we will provide the Board with an annual assessment on the implementation of the obligations of this Policy as well as the Statement. The Board shall consider the effectiveness of the measures described above and amend the statement as it sees fit.