



Modern Slavery Statement 2023

I. MODERN SLAVERY

Modern slavery is the term used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. In 2018, the *Modern Slavery Act 2018* (Cth) (“Act”) was passed by the Australian Government, imposing a modern slavery reporting requirement for larger companies operating in Australia. The reporting requirement is aimed at supporting the Australian business community to identify and address their modern slavery risks and maintain responsible and transparent supply chains. The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

II. OUR COMMITMENT

Though the Yarra Capital Management Group (YCM, we, our, us) is not a reporting entity under the Act, YCM is committed to upholding the highest standards of business ethics and conduct. We recognise our responsibility to respect human rights in the way we do business and the broader impacts to society of our business operations, purchasing and investment decisions. We believe a good fiduciary, mandated to create and preserve long-term wealth, must uphold the principles of sustainable and responsible investing.

YCM has adopted a risk-based approach to identifying and addressing modern slavery across our business activities. For example, where we have identified a supplier in a high-risk sector we will conduct enhanced due diligence on the supplier, their supply chain and how they manage modern slavery risk.

YCM's Managing Director has responsibility for assessing and managing modern slavery risks and impacts across YCM's business operations and the Yarra Capital Management Limited Board receives reporting on modern slavery risks annually.

This Statement has been approved by the Yarra Capital Management Limited Board on 29 August 2023.

III. OUR BUSINESS OPERATIONS AND SUPPLY CHAIN

YCM is one of Australia's largest independently owned active fund managers, with approximately \$A20 billion of funds under management as at 30 June 2023. YCM is focussed on delivering superior investment returns for clients through active fund management. We are the responsible entity / trustee of a number of registered and unregistered managed funds and manage a number of separate accounts for institutional clients. Our institutional clients include Australian and international superannuation funds, insurance companies, not-for-profit organisations and high net wealth individuals.

YCM offers its clients investment solutions across:

- Yarra Equities, offering style-neutral Australian equities, long-only listed equities, market neutral and private company strategies;
- Yarra Fixed Income capabilities including core fixed income, hybrids, credit, macro and RMBS;
- Tyndall Asset Management, offering long-only Australian value equities; and
- International equity products, through both direct partnerships with Nikko Asset Management Group, ARK and Goldman Sachs, and multi-manager strategies

As at the end of June 2023, YCM had approximately 85 employees in Melbourne and Sydney based offices. As an Australian based financial services company, our workforce is made up of professionals who are directly engaged by us. Our employees' terms and conditions are set out in contracts which comply with relevant employment legislation and industrial instruments.

Our supply chain includes third parties and outsourced providers appointed for the purpose of providing investment services and supporting the business operations. YCM contracts with a number of direct and indirect suppliers of goods and services.

Our primary service providers include:

- Fund administrators
- Custodians
- Registry providers
- Data and technology providers
- External investment managers
- External auditors and other professional advisers.

The majority of our spending on external goods and services are concentrated in professional services (covering custody/middle office/registry, investment management services and audit), data provision, rent, Information Technology and insurance. The majority of these suppliers are based in Australia, with some service providers having offices in the United Kingdom and United States of America. Relationships with our primary service providers are typically stable and longer term.

Our operations primarily support our management of client investment portfolios. Our investments are predominantly made in listed companies, many of whom themselves have regulatory responsibilities for managing modern slavery risks and/or have made voluntary commitments to human rights more broadly and modern slavery specifically.

IV. ACTIONS TO ADDRESS MODERN SLAVERY RISKS

Employment

YCM takes the way our employees and non-employees are treated in the workplace seriously. The candidate screening process includes a review of the individual's proof of identify, employment history and right to work in Australia. Each employee and non-employee's specific terms and conditions of employment and compensation for their work are documented in a written agreement prior to engagement. YCM complies with Australian legislation in relation to wages and working conditions. We have a range of internal policies that set out business standards for fair pay, appropriate use of labour, contract management, working conditions and non-discrimination.

Due diligence on vendors

YCM has ultimate responsibility for the performance of any outsourced activities. It is therefore imperative that suitable external service providers are selected and their performance is monitored on an ongoing basis. YCM's vendor selection process requires that, as part of any tender process, consideration be given to any modern slavery risks. YCM aims to ensure (through due diligence and monitoring) that its third-party providers acknowledge, assess and address any potential modern slavery risk practices.

Responsible investment and ESG framework

YCM is committed in its business operations to having care and responsibility, acting in the best interests of its people, the environment and its key stakeholders by taking into consideration the social, environmental, governance and financial impacts of its decisions. YCM maintains a responsible investment framework which guides YCM in effectively aligning its business and investment activities with its values and beliefs. The YCM's investment management teams are highly cognisant of modern slavery risk and considerations in our portfolios . More information on responsible investment and ESG can be found on our websites at www.yarracm.com and www.tyndallam.com

Code of Conduct

As per YCM's Code of Conduct, all staff are expected to act honestly, in a professional manner and behave in a manner that is not fraudulent, corrupt or unlawful. YCM does not tolerate bullying, discrimination, harassment, victimisation, unreasonable or unlawful behaviour or any unsafe work practices. YCM also has a number of compliance policies that contribute to the management of modern slavery risks including those relating to anti-money laundering and anti-bribery and corruption. YCM staff are given conduct training upon appointment and are required to regularly attest to having read, understood and adhered to internal policies.

Incident reporting

YCM has a mature incident management reporting framework to report, track and mitigate incidents or operational events. Incidents are reported to YCM's Board Audit, Risk and Compliance Committee. YCM's Whistleblower Policy also encourages, protects and supports reporting of wrongdoing, including fraud, corrupt conduct and inappropriate workplace behaviour.

V. REVIEW OF STATEMENT

This Statement will be reviewed annually by the YCML board to identify any changes in modern slavery risk and to assess the effectiveness of YCM's response to managing modern slavery risk.