



OC Premium Small Companies Fund

Modern Slavery Statement

Financial year ended 30 June 2024

I. The Reporting Entity

The OC Premium Small Companies Fund is (**Fund**) a registered managed investment scheme which invests in stocks listed on the Australian Securities Exchange outside of the S&P/ASX 100 index. The Fund is registered with the Australian Securities & Investments Commission (**ASIC**) (Australian Registered Scheme Number: 098 644 976).

II. Structure, operations and supply chains

A. Structure

The Fund was established on the 27 November 2000 as a trust under a constitution. The responsible entity and trustee of the Fund is Copia Investment Partners Ltd (**CIPL**) (Australian Financial Services Licence Number: 229316, ABN: 22 092 872 056).

CIPL has appointed OC Funds Management Pty Ltd (**OC Funds**) (ACN: 093 994 408) as the investment manager of the Fund. OC Funds places securities trades with stockbrokers appointed by CIPL. These stockbrokers arrange for securities trades to be settled via ASX Settlement and CHESS by the Fund's custodian.

Administration and custodial services are provided by Artega Investment Administration Pty Ltd (**Artega**) (ABN: 31 661 042 093). Assets of the Fund are held by Citigroup Pty Ltd (**Citigroup**) (ABN: 88 004 325 080) as sub-custodian appointed by Artega.

Fund unit registry and application processing services are provided by BoardRoom Pty Ltd (**BoardRoom**) (ABN: 14 003 209 836) under delegation from Artega.

Business support services for CIPL and OC Funds are provided by Copia Holding Company Pty Ltd (81 633 062 914) and Copia Service Company Pty Ltd (ABN: 83 633 299 902), all being related companies of the trustee.

The Fund is subject to annual financial statement and compliance plan audits by Ernst & Young (ABN: 75 288 172 749).

Securities trades are placed by OC Funds with stockbrokers appointed by CIPL. Trades are notified to brokers by software sourced from IRESS Limited (47 060 313 359).

The Fund's cash is held in accounts with St George Bank, a Division of the Westpac Banking Corporation (ABN: 33 007 457 141).

Customers may invest into the Fund directly or by using the services of a financial planner.

B. Operations

The Fund operates as a unitised trust. It does not employ staff.

The responsible entity and trustee of the Fund, CIPL, is responsible for the operations of the Fund. CIPL's principal place of business is:

Level 47, 80 Collins Street
Melbourne Victoria Australia

CIPL has 19 employees and has additional offices in Sydney and Brisbane.

The investment manager, OC Funds, has been appointed by CIPL to develop and implement the investment strategy for the Fund.

The OC Funds invests clients' funds in securities listed on the Australian Stock Exchange (**ASX**) or other recognised exchanges set out in a product disclosure statement and an investment management agreement effected between CIPL and OC Funds.

Securities trades are placed with stockbrokers with access to ASX Settlement and CHESS using IRESS web-based software. These trades are advised when placed to Citigroup, the sub-custodian, who settles purchase trades using cash held in the Fund's bank account or receives cash into the account for sale trades.

Artega, the fund administrator contracted by CIPL has appointed Citigroup as a sub-custodian. Artega has also appointed BoardRoom as the unit registry service provider for the Fund.

Applications for units in the Fund are processed by BoardRoom. On approval of each application being acceptable, the applicants' information is loaded into the unit registry, and applicants are then issued with units calculated by application amount divided by the applicable unit price for the day.

C. Supply chains

1. The Responsible Entity

CIPL is the responsible entity and trustee of the Fund. CIPL has prepared this Statement on behalf the Fund. CIPL is not a reporting entity.

CIPL is a small business, and it engages in fair workplace practices. CIPL has contracted with a human resources professional who advises CIPL on recruitment, staff performance management and workplace practices. All staff are paid market competitive remuneration per the terms of their respective employment agreements which are prepared in accordance with the requirements set by the Fair Work Commission.

CIPL is aware of the modern slavery requirements, and it is conscious of these requirements when appointing outsourced service providers.

In our opinion the risk of CIPL engaging in modern slavery practices is low.

2. The investment manager

The investment manager, OC Funds, is a small business and a related party of CIPL. It is not a reporting entity. Its employees are highly qualified and experienced investment professionals who receive market competitive remuneration per the terms of their respective employment agreements which are prepared in accordance with the requirements set by the Fair Work Commission. OC Funds does not engage in any form of modern slavery practices. It has adopted a Modern Slavery Policy which has been approved by the Head of the OC Funds Management Investment Committee, Mr Bruce Loveday, who is also the Chairman and independent director of CIPL.

3. The custodian and administrator

Artega is a financial services business currently owned by Challenger Limited. Challenger Limited provides an annual Modern Slavery Statement on behalf three Challenger group companies as reporting entities. These Statements extend to Artega and they are available on the Australian Government's Modern Slavery Statements Register.

Based on the reporting provided in Challenger's Modern Slavery Statements we considered that the risk of Artega engaging in modern slavery practices is low.

4. The unit registry service

BoardRoom is not a reporting entity. BoardRoom has a Modern Slavery Policy in place to assess, manage, and address modern slavery risks and human rights impacts within its business and supply chain. The Modern Slavery Policy outlines BoardRoom's commitment to ethical business practices and human rights standards, with specific emphasis on preventing any form of exploitation or coercive practices.

The Policy supports internationally recognized human rights standards, including the United Nations Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

The policy includes several procedures to specifically identify and address modern slavery risks.

5. The sub-custodian

The Fund's assets are held by Citigroup as sub-custodian.

Citigroup is a reporting entity, and it provides an annual Modern Slavery Statement which is available from the Australian Government's Modern Slavery Statements Register.

Based on the reporting provided in Citigroup's Modern Slavery Statements we considered that the risk of Citigroup engaging in modern slavery practices is low.

6. The bank

The Fund's accounts are held with St George Bank, a division of the Westpac Banking Corporation (**Westpac**).

Westpac is a reporting entity, and it provides an annual Modern Slavery Statement which is available from the Australian Government's Modern Slavery Statements Register.

Based on the reporting provided in Westpac's Modern Slavery Statements we considered that the risk of St George Bank engaging in modern slavery practices is low.

7. The stockbrokers and IRESS

CIPL has appointed 41 stockbrokerages which are used by OC Funds to place securities trades. Most of these businesses are reporting entities and they annual Modern Slavery Statement which are available from the Australian Government's Modern Slavery Statements Register.

Based on the reporting provided those brokerages' Modern Slavery Statements we considered that the risk of them engaging in modern slavery practices is low.

A minority of brokerages engaged by CIPL are not reporting entities. Further work is required to confirm the awareness of these small brokerages about modern slavery practices and how they address the requirements of the *Modern Slavery Act 2018*. These small brokerages are all based in Australia and are either licensed by ASIC or authorised by a licence holder. Therefore, we consider that the risk of these brokerages engaging in modern slavery practices is low.

IRESS Limited is a reporting entity, and it provides an annual Modern Slavery Statement which is available from the Australian Government's Modern Slavery Statements Register.

Based on the reporting provided in IRESS' Modern Slavery Statements we considered that the risk of IRESS engaging in modern slavery practices is low.

8. Platforms

CIPL engages with 17 platforms on behalf of the Fund. The platforms are reporting entities and they annual Modern Slavery Statement which are available from the Australian Government's Modern Slavery Statements Register.

Based on the platform's Modern Slavery Statements we consider that the risk of them engaging in modern slavery practices is low.

9. The auditors

Ernst & Young is a reporting entity, and it provides an annual Modern Slavery Statement which is available from the Australian Government's Modern Slavery Statements Register.

Based on the reporting provided in Ernst & Young's Modern Slavery Statements it is considered that the risk of Ernst & Young engaging in modern slavery practices is low.

10. Financial planners

CIPL provides information about the Fund to financial planners who may decide to recommend it as an investment to their clients.

We do not consider financial planners to be service providers to the Fund but to investors. We do not engage with financial planners about their approaches to modern slavery matters.

11. Fund assets

The assets held in the portfolio of the Fund are not part of the supply chain.

III. Risk of modern slavery practices in the operations and supply chains

Based on assessments of the supply chain above, we consider that the risk of the Fund engaging in modern slavery practices through its services providers is low.

IV. Actions taken to assess and address modern slavery risks

CIPL on behalf the Fund engages the service providers used in the supply chain. CIPL has a rigorous process for identifying, contracting with and managing outsourced providers set out in an Outsourcing Policy.

CIPL has worked with OC Funds in preparing and implementing a Modern Slavery Policy.

Staff are provided with regular regulatory training, which includes coverage of the *Modern Slavery Act 2018*.

V. Assessing the effectiveness of its risk mitigations

No instance of a modern slavery practice has been identified by CIPL in operating the Fund.

The assessment of the Fund's services providers indicate that they are predominantly large financial institutions who have implemented modern slavery controls which are reported to the Government in annual reports.

In our view the risk mitigations are effective.

Further work, however, is required make some smaller stock brokerages aware of and to report on their modern slavery control practices.

VI. Approval by Board

This Statement has been approved by the Board of CIPL as the responsible entity of the Fund.

A handwritten signature in black ink, appearing to read 'Bruce Loveday', with a small dot at the end.

Mr Bruce Loveday

Chairman and Independent Director