

VIVCOURT'S MODERN SLAVERY STATEMENT

for the financial year ended 30 June 2020



VIVCOURT

The Reporting Entity

This is the inaugural Modern Slavery Statement for Vivienne Court Trading Pty Ltd (VivCourt) for the financial year ended 30 June 2020 and has been prepared in accordance with the requirements of the *Modern Slavery Act 2018* (the Act).

As at the date of this Statement, The Court Foundation Trust was the ultimate beneficial owner of VivCourt.

As of the date of this Statement, VivCourt employed 101 team members. 72 members of the team working predominantly from Sydney with small teams in each Melbourne and Brisbane and Amsterdam

We aim to align our work, operations and suppliers with partners who share our core values, including the use of social enterprise organisations as our support service providers.

Our intention is to work constructively with our suppliers and partners to eliminate the drivers contributing to modern slavery and reverse conditions to enable everyone to enjoy all their rights.

For more about VivCourt's activities particularly in the *not for profit* space, please look at the VivCourt [website](#) and VivCourt [social media](#).

VivCourt's structure, operations and supply chains

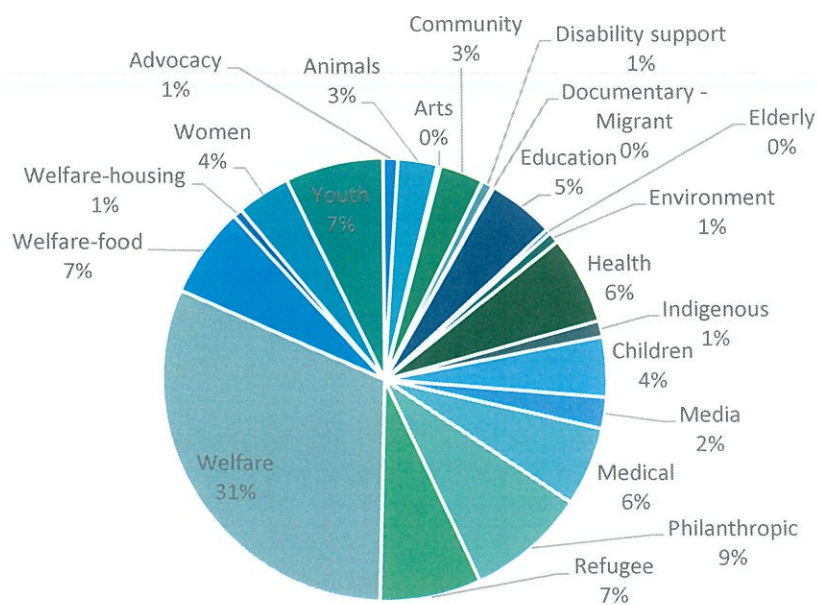
VivCourt is a proprietary trading company with our Head Office in Sydney Australia. We trade currencies, equities, commodities and energy products. We use external companies to effect our clearing and settlement obligations.

We opened in 2013 with four employees, trading in the financial markets though determined to work within a new structural model. The core idea of VivCourt is that by investing our profits directly into good causes, we provide a new meaning to our reason for operation, motivation for staff and vastly diverse outcomes in our interactions with the broader community. For see more of our backstory [here](#).

Our supply chain, and therefore our key risk areas, includes the development, installation and maintenance of our bespoke technology solutions to support our internal trading strategies. As such, our providers (ie. our supply chain) include hardware suppliers, telecommunications suppliers and financial market settlement providers. The secondary level of our supply chain includes suppliers our general operations, including property agents, insurance providers, cleaning and catering services. We understand that the provision of, including the manufacturing of some of these goods, may take place in high risk countries. A third component for VivCourt is the high number of *not for profits* we donate to, including to some organisations based outside Australia.

Our suppliers tend to be with established trusted and stable partners, with relationships built up over a longer period. These partnerships are vital to VivCourt is providing essential and uninterrupted services necessary for our direct daily operations. The same priority is given to our secondary providers with significant due diligence undertaken in order to engage and establish a good relationship with social enterprise providers as far as possible. Our donation process follows a similar rigorous due diligence process.

Reflecting their response to the covid pandemic, the VivCourt team donated \$5.5m in the reporting period contributing to:



Risks of modern slavery practices in VivCourt's operations and supply chains

With reference to the Modern Day Slavery resources supplied by the Australian Government, together with reference data and resources from non government organisations such as the International Labour Organisation (ILO), VivCourt understands that although we are in a low risk sector, the following areas of our supply chain fall within higher risk sectors and may use offshore manufacturers for parts and/or assembly that may be located in countries reported as having a higher prevalence of modern slavery:

- technology and hardware suppliers
- office supply providers
- clothing suppliers

For our cleaning services and catering providers, VivCourt has deliberately fostered relationships with entities from the *not for profit* sector so are more confident of understanding of modern slavery concerns and therefore compliance with the Act in these instances.

VivCourt's aim for the subsequent reporting periods is to work with one of our partner *not for profit* organisations – [The Freedom Hub](#) – to map our supply streams to then be able plan a course of action as needed to eliminate modern slavery practices.

Actions to assess and address modern slavery risks

VivCourt will review relevant internal policies that will assist in managing modern slavery risks, notably our on-boarding and compliance Policies. We envisage that this will include a whistleblower procedure where team members are able to freely speak up about human rights concerns as relevant to VivCourt.

We will assess our policies, process and guidelines particularly in relation to procurement for the first two of our three supply chains - hardware, telecommunications and financial market settlement providers; and general operations suppliers – including seeking to understand their activities and commitment to human rights and whistleblower protections and their own steps to addressing modern slavery risks. Our aim is to foster and develop relationships to better understand good practice points across all our supply chains.

In VivCourt's practice of partnering with *not for profits* – as service providers and donation recipients - we seek suppliers who utilise fair and ethical labour practises and are, as far as possible, social enterprises registered with [ACNC](#).

VivCourt's foundational stance dictates that we will always seek suppliers who align with our values and ethics. To this end, we will include the explicit acts of seeking to identify, prevent and mitigate modern slavery risks in all our activities and supply chain. This will include seeking, where relevant, a

supplier's modern slavery statement or similar assurances and evidence that they do not engage in modern slavery activities and their own supply chains are working to ensure the elimination of any such risks. Our expected results of this assessment will be to determine if we seek alternative suppliers and/or engage with the suppliers to encourage their own review of the Act.

Effectiveness of VivCourt's actions

We work in a highly regulated environment so are confident that by implementing the following processes into our current work practices, VivCourt will move quickly towards our objective to eliminate the drivers contributing to modern slavery and reverse conditions to enable everyone to enjoy all their rights:

- Review and supplement all policies, notably our on-boarding and compliance policies to include Modern Slavery considerations.
- Assist staff, particularly management and the procurement team, to be fully conversant with modern slavery risks and how avoid those supply chains where possible, or seek to mitigate along the chain.
- Assist all staff to identify potential risks in our engagements both inside and outside the office to expand awareness and seek to address potential risks in our daily engagements. We will seek particular support from [The Freedom Hub](#) for this item.
- Ensure annual policy reviews required of staff incorporate Modern Slavery awareness and consideration.
- Establish transparent and confidential whistleblower opportunities to raise concerns.
- Incorporate learning opportunities for staff about the prevalence and impacts of Modern Slavery by inviting organisations to present, including: *not for profits* working with survivors of modern slavery both in Australia ([The Freedom Hub](#)) and overseas ([Tenaganita](#), Malaysia).

Other relevant detail

We have had an association with The Freedom Hub for several years and will seek their support to:

- research our supply chains and map our suppliers
- coach us on how to approach suppliers and query their code of conduct
- support us to find new ways of working with suppliers, as necessary
- help us to review our relevant policies
- leverage the new market opportunities of ethical supply chains

Next steps

VivCourt is committed to continuously improve our engagement with community using the Universal Declaration of Human Rights, together with its articles and covenants as our guidance tools.

Specifically in relation to modern day slavery risks, we will look to expand our response for the next reporting period by:

- Seek guidance from experts such as The Freedom Hub Ltd (ABN: 18168758530) in reviewing our supply chains and training both our team and as relevant our suppliers in Modern Slavery issues and mitigants.
- Commence and continue conversations with our partnerships, including where possible, each entity in our supply chains, regarding their modern slavery risk profiles and mitigation.
- Expand our internal education to highlight the causes and types of modern slavery and how we can each address this both within our work environment and personal lives.

This statement was approved by the Board of Directors / management of VivCourt:

Signed for and on behalf of the VivCourt group:



Robert KELDOULIS
CEO, VivCourt

18/3/21

Date