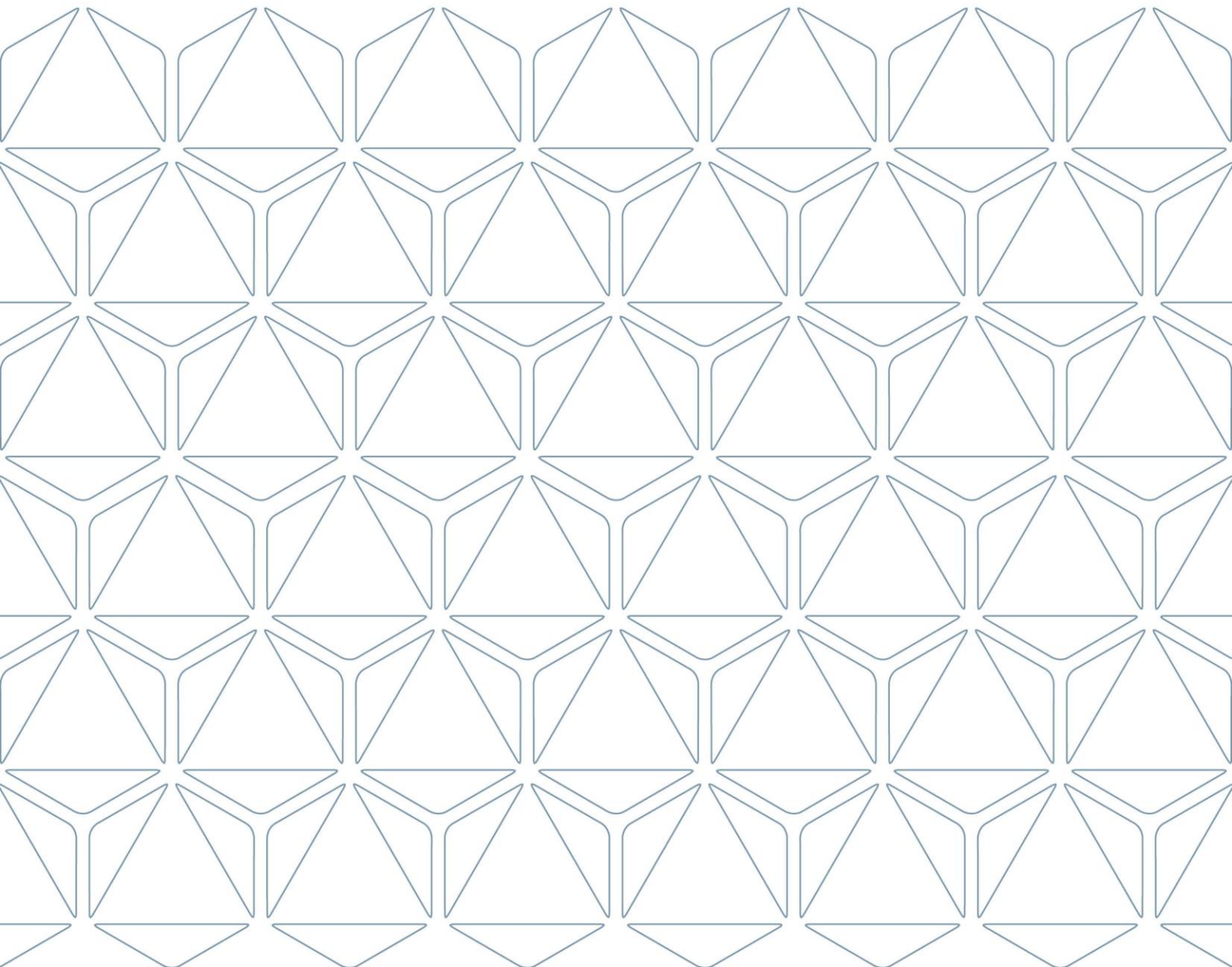


# Modern Slavery Statement Praemium Limited

ABN 74 098 405 826

## Year ended 30 June 2025



# A statement from our CEO

Modern slavery is a widespread global human rights crisis of our time. According to the Global Slavery Index over 50 million people are affected by modern slavery worldwide and the International Labour Organization (ILO) estimates forced labour generates US \$236 billion in illegal profits annually. At Praemium Limited, we are seeking to do our part to increase awareness of modern slavery across our business and community.

This statement is made by Praemium Limited (ABN 74 098 405 826) pursuant to section 13(1) of the Modern Slavery Act 2018 (Cth). It constitutes the statement of Praemium Limited and its owned and controlled entities. Our statement outlines the actions undertaken by Praemium to identify and mitigate the risk of modern slavery occurring in our operations and supply chain in FY25 as well as our ongoing commitment to continuous improvement.

We are pleased to share Praemium's Modern Slavery statement and we look forward to keeping you updated as we work to continuously improve our identification, management and mitigation of modern slavery risk exposure.

A handwritten signature in black ink, appearing to read 'AWamsteker', written in a cursive style.

Anthony Wamsteker  
Executive Director/ CEO

# About us

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Praemium Australia Limited (PAL), Powerwrap Limited (PWL), MWH Capital Pty Ltd (MWH), OneVue Wealth Services Ltd (OVWS), Investment Gateway Pty Ltd (IG), OneVue Wealth Assets Pty Ltd (OVWA) are wholly owned subsidiaries of Praemium Limited (PPS), an ASX listed company (collectively referred to as Praemium).

Praemium was established in 2001 and provides investment platform solutions for the Australian financial advice and private wealth management market.

Our products and services are:

- Praemium Separately Managed Accounts, a registered managed investment scheme;
- Praemium SMA Superannuation Fund (as promoter, and not issuer);
- Powerwrap Scheme, a registered managed investment scheme;
- Praemium Spectrum Investor Directed Portfolio Service;
- OneVue Managed Account, a registered managed investment scheme;
- OneVue Investor Directed Portfolio Service;
- Your Choice Super Superannuation Fund (as promoter, and not issuer); and
- Virtual Managed Account software and administration services.

## Our objectives and values

### Objectives

- Deliver customer value and sustainable growth
- Attract and retain market-leading people
- Continue to deliver Australia's HNW platform of choice
- Support the evolution of advice

### Values

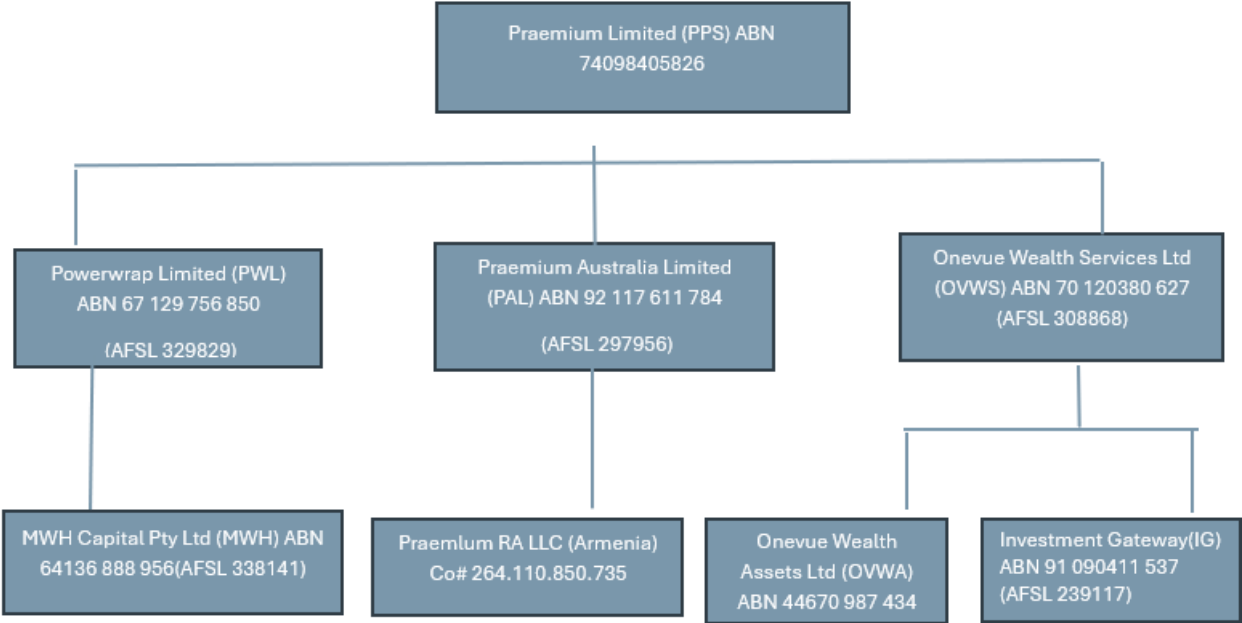
- Customer focused
- Collaboration
- Excellence
- Accountable
- Empowering

Our Code of Conduct outlines the values and principles that we expect all our people to observe.

# Our Structure

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This joint modern slavery statement covers the activities of Praemium Limited and its wholly owned and controlled entities as at 30 June 2025. All entities are Australia based other than Praemium RA LLC (based in Armenia). OneVue Wealth Services Ltd, OneVue Wealth Assets Pty Ltd and Investment Gateway Pty Ltd were acquired on 15 April 2024.



For more information on our structure and operations refer to the below reports available in the Praemium website:

- Annual Report
- Half-year presentation
- Corporate Governance statement

## Our operations

Through its wholly owned subsidiaries Praemium provides investment administration, portfolio reporting and managed account solutions to financial advisers, investment managers and their clients. The Praemium investment platform offers custody, nominee and administration services, enabling investors to access a wide range of investments including managed accounts, virtual managed accounts software and administration. MWH Capital Pty Ltd has corporate authorised representatives who are authorised to provide financial advice to clients.

Our business is primarily office based encompassing hybrid working arrangements. Our core operations are performed from our registered offices located at:

- Level 19, 367 Collins Street, Melbourne VIC 3000
- Level 3, 50 Bridge Street Sydney NSW 2000

- Level 54, 111 Eagle Street Brisbane City QLD 4000
- Level2/300 Murray Street Mall Perth WA 6000
- Praemium Armenia 9 Alek Manukyan Street, Yerevan 0070 Armenia

As at 30/06/2025, the Group employed 369 people. Our people are employees on a permanent (365), contract, (3) or casual basis (1). A large percentage of our people are dedicated to product innovation, technology, and customer service.

## **Our Supply chain**

Our supplier arrangements range from multi-year, large value strategic partnerships governed by supplier contracts and one-off purchases from non-contracted suppliers. We have identified approximately 127 key suppliers that support us in operating our business (70 suppliers over \$50,000 and 57 model managers).

While most of our suppliers are based in Australia, we also have some suppliers based in India, Hong Kong, Philippines, Singapore and USA. These are mostly technology or investment manager firms. Praemium engages a third-party service provider in India for business support/operational tasks. As these sectors engage skilled, professional and office-based staff the risk of modern slavery is considered low. This is further supported by the fact that these industries operate in regulated environments with professional employees recruited under formal contracts.

# Risks of modern slavery practices in the operations and supply chains

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Praemium undertook risk assessments of modern slavery risks in our operations and supply chains in FY 25. The two identified risks were in our employment practices and our supply chains.

As an Australian-based financial services provider, Praemium considers the direct risk of modern slavery within our operations to be low. Praemium's Australian and Armenian operations practice responsible recruitment practices and comply with the relevant country requirements (Australian and Armenian).

Since most of our suppliers are based in Australia, where the inherent risk of modern slavery is lower, we also assess the risk within our corporate supply chain as low. We have long term formal contracts with the majority of our external third-party suppliers.

## Modern slavery risk assessment FY25

### Suppliers

For the modern slavery assessment in FY25, Praemium took into account a supplier's geographic location, industry and our spend amount with a supplier.

For FY25, a total of 270 suppliers were identified. Of these 110 were identified as key suppliers (spend amount greater than \$50,000) of whom 41 had a published Modern Slavery statement that showed their modern slavery risks and how they address it.

Therefore, Praemium had 69 in-scope corporate suppliers eligible for further assessment regarding modern slavery risks. Of the 69 in-scope suppliers, questionnaire responses were received from 59 suppliers. This indicates a strong willingness to cooperate with Praemium in its effort to prevent Modern Slavery in its supply chain.

Of the responses received from corporate suppliers to the modern slavery questionnaire, no instances of modern slavery were identified. With the application of our risk-based assessment approach and in conjunction with data sourced from the external suppliers the inherent risk of modern slavery across the in-scope population of Praemium suppliers was assessed as low.

Praemium RA LLS engages some suppliers for the operations of the Armenian business. These suppliers are Armenian based and are for technology, operational and professional services which are industries with a low risk for modern slavery and with a relatively low level of spend amount. As such the overall risk for Praemium RA LLS suppliers is also assessed as low.

## Employment practices

Praemium has a predominantly directly employed professional workforce based in Australia. We are strongly committed to the Fair Work Act 2009 (Cth) and other statutory obligations related to employment, including applying all employee rights and protections within the employment contracts. Praemium has a number of People and Culture related policies and procedures including:

- Parental leave policy
- Leave policy
- Flexible working management standard
- Purchased annual leave management standard
- Time recognition (time in lieu and overtime)
- Recruitment and Selection procedure
- Acceptable workplace behaviour
- Ways of Working (Code of Conduct)

In addition to these policies a Modern Slavery policy was introduced in FY25 which is applicable to all employees. This provides awareness and outlines our commitment to addressing modern slavery in all forms. Our staff involved in recruitment and supplier management have been provided a copy of the Modern Slavery policy and attested to have read and understood policy requirements.

Praemium follows an employee due diligence process prior to an offer of employment. Potential candidates need to undergo a reference and background check which includes education, prior employment, criminal background check and a right to work in Australia check. The People and Culture team engage external recruitment agencies to assist with filling temporary roles. These agencies undergo our supplier due diligence onboarding process and have also been assessed for Modern Slavery risks in FY25.

The Finance and Payroll team have a number of controls in place to ensure the timely and accurate submission of payroll tax, and the review and processing of monthly payroll to ensure employees are paid accurately and on time.

Praemium RA LLC based in Armenia predominantly does IT development work. Armenian recruitment is predominantly for technology roles. The Armenian workforce comprises of qualified professionals operating in the Armenian office under Armenian employment laws. The recruitment practices comply with Armenian labour law, employment contracts reflect the Armenian labour code, and payroll related information is submitted to the Statistical Committee of the Republic of Armenia. All payroll related information including income tax returns are submitted to the State Revenue Committee of the Republic of Armenia.

An annual employment satisfaction survey is conducted through which any issues related to employee wellbeing can be identified and addressed. We consider risks in our employed workforce to be low and appropriately managed.

# Actions to assess and address risks

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In this reporting period we have put in place our first Modern Slavery policy and revised and updated our Supplier & Outsourcing policy, including reviewing supplier engagement processes. Our Economic and Trade Sanctions policy which was introduced this year strengthens our due diligence practices across our supply and client relationships.

## Modern Slavery watch list

Where remedial action or appropriate mitigation has not occurred, or the supplier has not responded to the modern slavery questionnaire, the supplier has been placed on Praemium's Modern Slavery watch list.

Ten suppliers have been added to the watch list due to not responding to the questionnaire.

Praemium will continue to monitor suppliers on the watch list over the next 12 months. Monitoring will focus on identifying specific triggers—such as adverse media coverage, audit findings, or legal actions—that may warrant further scrutiny. Where such triggers arise, a review of the supplier will be conducted.

## Reporting concerns

Praemium has implemented a Whistleblower policy which is a crucial component of the business's risk mitigation strategy and provides a clear mechanism for the reporting of any instances of modern slavery for employees, as well as other stakeholders.

There is also an internal process to manage incidents and breaches including root cause analysis and corrective actions to address and resolve reported issues.



# Assessing the effectiveness of actions

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To determine the effectiveness of Praemium's Modern Slavery initiatives, an annual review will be undertaken to examine:

- the data quality of supplier information in our supplier register;
- the number of incidents or breaches relating to the Modern Slavery Policy in the review period;
- Incidents, breaches and complaints giving rise to or identifying modern slavery risks/situations.
- stakeholder feedback;
- response rate of Tier 1 (spend value of over \$50,000) suppliers to the annual questionnaire (and in following years assessing response rates for subsequent tiers);
- the volume of Tier 1 suppliers the organisation engages to ensure we mitigate the risk of using numerous suppliers for similar functions;
- regular management and Board reporting on Praemium's residual risk as it relates to Modern Slavery;
- review of the process and questions asked in the onboarding due diligence process to ensure any potential Modern Slavery risks are identified before onboarding a supplier.

# Consultation

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During FY25, consultation and collaboration regarding modern slavery risks and obligations has occurred through Executive Risk forums and regulatory change communications that are circulated to the executive leadership and other key stakeholders.

In preparing the Modern Slavery Statement, Praemium Ltd consulted with and received input from representatives across all Praemium entities, Praemium Senior leadership team, various business units, and the Praemium Audit, Risk, and Compliance Committee.

# Other Information

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As this is our inaugural statement, we recognise that our approach to managing risks related to Modern Slavery in our operations and supply chains will continue to evolve and mature.

In FY26 our focus will be on:

- Further integrating our modern slavery governance and compliance arrangements into the risk management framework.
- Implementing a supplier questionnaire for suppliers who are identified as high risk or having potential red flags.
- More detailed oversight of suppliers for whom no Modern Slavery information has been provided.
- We will continue to engage with our suppliers so that they are aware that we do not support Modern Slavery and where necessary will incorporate modern slavery clauses in our contracts.

Two sets of training were rolled out to Praemium staff in August 2025 to build awareness and knowledge of modern slavery.

## General awareness training

A Modern Slavery general awareness training module has been deployed via Praemium's online HR system, Employment Hero. The general awareness training is mandatory for all Praemium employees (Australian based) to complete. The training incorporates the Modern Slavery Policy and provides directions to follow if a suspected or actual case of Modern Slavery is observed.

## Targeted training

Targeted training of employees involved in supplier relationships (both Australia and Armenia) has been rolled out separately to assist them in identifying risk indicators among supplier types, relationships and scenarios where Modern Slavery risks may occur. This will enhance the procurement and due diligence process. Where an unacceptable degree of Modern Slavery risk is identified with a prospective supplier, Praemium will cease any further engagement with them.

This Modern Slavery Statement was approved by the Board of Praemium Ltd in their capacity as principal governing body of Praemium Ltd on 24 September 2025.



**Barry Lewin**

**Praemium Limited Chairman**