

VIVIENNE COURT HOLDINGS PTY LTD

MODERN SLAVERY STATEMENT

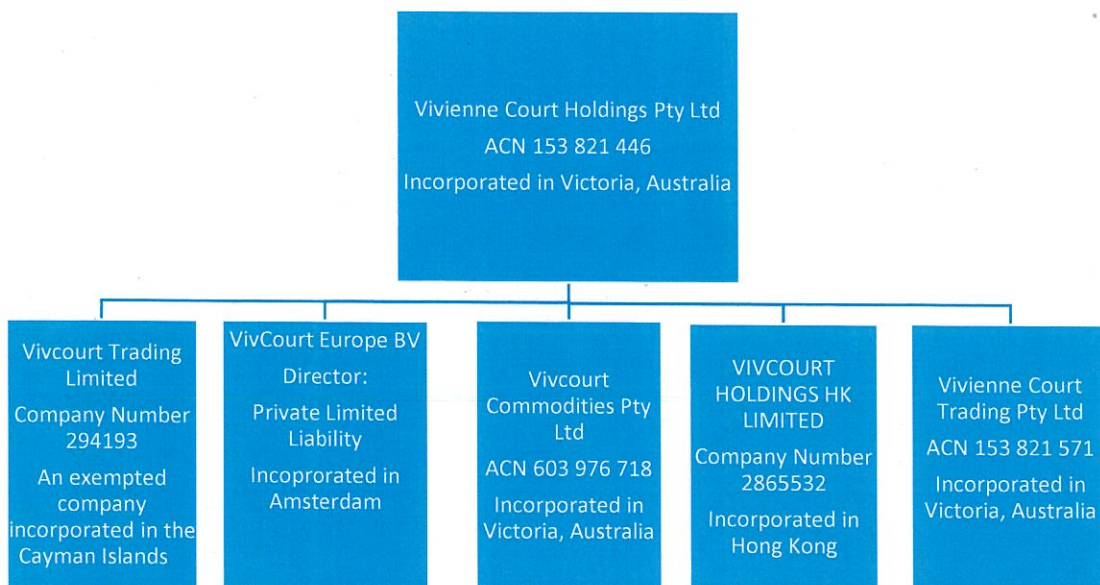
for the financial year ended 30 June 2021



VIVCOURT

The Reporting Entity

This is the annual Modern Slavery Statement for Vivienne Court Holdings Pty Ltd and the entities it controls (per the organisational chart below) (collectively referred to as **VivCourt**) for the financial year ended 30 June 2021 and has been prepared in accordance with the requirements of the *Modern Slavery Act 2018* (the Act).



VivCourt consulted with each entity to ensure a consolidated statement was submitted. VivCourt policies and procedures apply to the group as a whole and supplier relationships for each entity were reviewed as part of the modern slavery risk analysis. Employee training was provided to all relevant personnel across all group entities who engage with suppliers.

As of the date of this Statement, VivCourt employed 99 team members. 79 members of the team working predominantly from Sydney with small teams in each Melbourne and Brisbane and Amsterdam.

VivCourt continuously aims 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. As a continuation of this objective, we increasingly aim 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

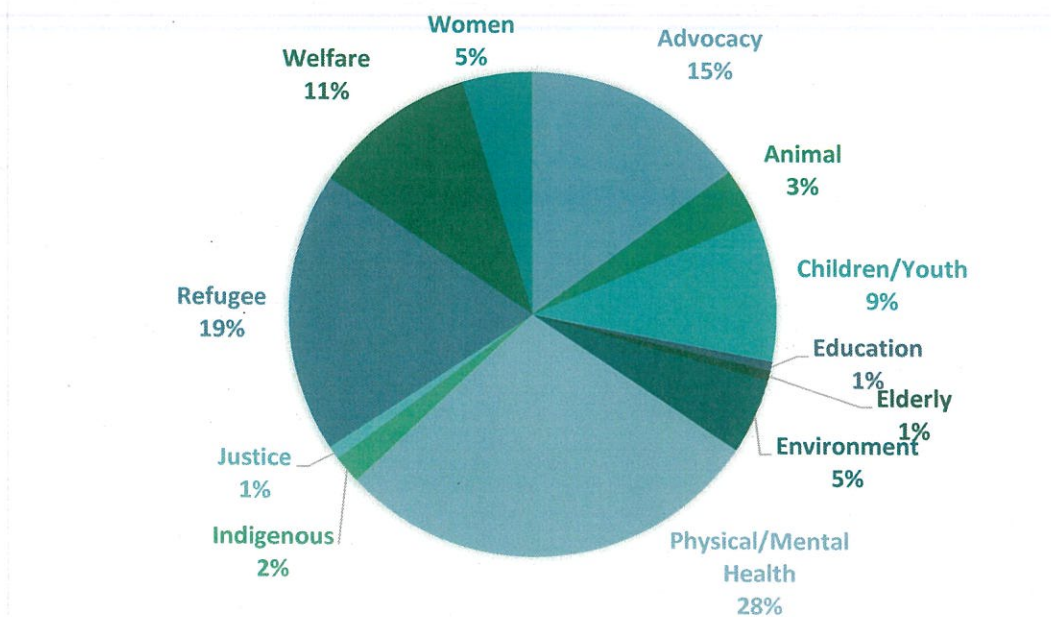
VivCourt is a proprietary trading company with our Head Office in Sydney Australia. We trade currencies, equities, commodities and energy products. We use external companies to effect our clearing and settlement obligations.

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 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.

We aim for our suppliers to be with established trusted and stable partners, with good and constructive relationships built up over the longer period. These partnerships are vital to VivCourt in 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 good relationships with social enterprise providers. Our donation process follows a similar rigorous due diligence process.

For the previous financial year, VivCourt staff donations reflected our response to the covid pandemic, with the team able to donate \$5.5m. In the current period, VivCourt staff donated \$1.1m to the following sectors:



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, 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

For our cleaning services, catering providers and sporadic clothing suppliers, 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.

Actions to assess and address modern slavery risks

During this latest reporting period, we initiated our modern slavery review with our *not for profit* partner [The Freedom Hub](#).

We have agreed a plan for the new 2021-2022 reporting period that includes commencing our risk analysis including identifying gaps; setting benchmarks for success; outlining targets and timeframes; and establishing the analytics tools for this benchmark exercise.

The implementation plan will work to implement a supplier assessment and risk analysis; and looking at their codes of conduct and remediation plans.

Effectiveness of VivCourt's actions

We work in a highly regulated environment so are confident that implementation of supplementary processes into our current work practices, supports 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.

- Ensure annual policy reviews required of staff incorporate Modern Slavery awareness and consideration.
- Establish transparent and confidential whistleblower opportunities to raise concerns.
- In this current financial year reporting period, we commented this objective by providing bespoke training by the Freedom Hub to core staff covering modern slavery issues and our work to support elimination of such practices.

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:

- Continue our work with experts such as The Freedom Hub Ltd in commencing risk analysis and supply chain mapping using their risk analysis platform; and
- Undertake conversations with our partnerships, including as relevant, regarding their modern slavery risk profiles and mitigation.

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

Signed for and on behalf of VivCourt:



Robert KELDOULIS
Director, Vivienne Court Holdings Pty Ltd and CEO of VivCourt

4/2/22

Date