

Voluntary Modern Slavery Statement 2021

Introduction

This Modern Slavery Statement (**Statement**) is made in accordance with the Modern Slavery Act 2018 (Cth) (**the Act**) and covers the activities of VGI Partners Limited ACN 129 188 450 (the **Manager**), and each of the **Manager's** related bodies corporate (collectively referred to as **VGI Partners, we, our**). The **Manager** has consulted with the key management personnel of each of the **Manager's** related bodies corporate in preparing this **Statement**.

This **Statement** sets out the steps we have taken during the year ended 31 December 2021 to prevent modern slavery in our business and supply chains. This **Statement** is a 'voluntary modern slavery statement' and has been lodged with the Australian Border Force in accordance with the **Act**.

VGI Partners has a zero-tolerance approach to modern slavery within its organisation and supply chain. At VGI Partners, we recognise that human rights is an area of importance to our employees, shareholders, clients, and the communities in which we do business. We also acknowledge our role in seeking to safeguard human rights through ethical and sustainable business practices.

VGI Partners' exposure to modern slavery risks emanate from two primary sources – our investment activities on behalf of our managed funds, and our procurement of services through supply chains/service providers.

VGI Partners business, operations, and supply chain

VGI Partners Limited (ASX:VGI), founded in 2008 and publicly listed on the Australian Securities Exchange in 2019, is a high conviction global equity manager with offices in Australia, New York, and Tokyo.

VGI Partners manages capital for high-net-worth individuals and family offices through separately managed accounts, unlisted funds, and Australian listed investment companies: VGI Partners Global Investments Limited (ASX:VG1) and VGI Partners Asian Investments Limited (ASX:VG8). As at 31 December 2021, VGI Partners managed around A\$2.5 billion of client net assets.

VGI Partners is the holder of an Australian Financial Services License (AFSL 321789) and is an SEC-registered investment adviser.

VGI Partners Employees

VGI Partners had, as at 31 December 2021, 27 employees globally, based in Australia, New York, and Tokyo. VGI Partners ensures all employees are paid in excess of the minimum wage, have the right to work (including checks on identity and visa status) and work in a safe, healthy, and inclusive workplace. VGI Partners has continued operations during the COVID-19 pandemic, retained staff, and increased and maintained high standards of occupational health and safety.

VGI Partners Investment Process

VGI Partners invests managed funds on a global basis, seeking out what it considers to be the best investment opportunities in any country with a robust legal system. The factors that underpin the VGI Partners' investment process are wide ranging incorporating macro-economic and financial analysis alongside strong governance factors. The majority of VGI Partners' investment operations are conducted using in-house resources.

VGI Partners is developing processes around modern slavery risks and labour standards in its investment process and we expect to be able to comment further on our effectiveness during the 2022 financial year.

VGI Partners Supply Chain/Service Providers

VGI Partners has contractual relationships with some of the best-in-industry service providers both in Australia and internationally. VGI Partners' suppliers/service providers include:

- Prime brokers and broker service providers
- Administration and governance service providers for investment funds
- Information technology service providers
- Share registries
- Building lease and maintenance service providers
- Audit, advisory, legal, compliance and governance service providers
- Other suppliers (including office equipment suppliers, property service providers, etc.)

VGI Partners conducts due diligence on its suppliers and notes that material service providers (namely, its prime brokers, administrators, Australian information technology managed service provider, and Australian property lessor) maintain Modern Slavery Statements either in Australia or in their country of domicile.

VGI Partners, when onboarding and when performing ongoing reviews of services providers, looks to obtain assurances from service providers that their working practices and supply chains are regularly reviewed and free from modern slavery.

Identified and addressing supply chain risks

There are two primary areas within our business where there may be a risk that we cause, contribute to, or are directly linked to, modern slavery. These two areas are our investment activities on behalf of our managed funds, and our procurement of services through service providers.

While we did not identify any incidents or risks of modern slavery within our investment operations and primary service providers during the financial year ended 31 December 2021, VGI Partners will continue to undergo a due diligence process with all investments and suppliers/service providers to ensure VGI Partners is not contributing to any forms of modern slavery.

Our policies and procedures

In addition to this Statement, VGI Partners maintains related policies/programs including the following:

- Code of Conduct – sets out the standards that VGI Partners' directors and employees are expected to observe
- Outsourcing Policy – sets out the selection process and monitoring procedures of outsourced suppliers/service providers
- Whistleblower Policy – sets out VGI Partners' policies in respect of whistleblowers and encourages disclosure of wrongdoing and allows for anonymous reporting of issues

Training is provided to all employees on VGI Partners' policies and procedures. All employees are required to sign, at the commencement of their employment and annually, a document pursuant to which they acknowledge that they have read, and agree to adhere to, all VGI Partners' policies and procedures including the Code of Conduct.

VGI Partners will continue to evaluate the effectiveness of its policies and procedures on combating modern slavery practices. When required in accordance with the Act, VGI Partners will publish an annual Modern Slavery Statement that outlines the steps we have taken during the relevant financial year to identify where our supply chains and operations may be contributing to modern slavery practices, and the actions we have taken to minimise these risks.

Assessing the effectiveness of our actions

VGI Partners' Executive Committee, in conjunction with VGI Partner's Compliance team, oversees the operation and continued effectiveness of VGI Partners' modern slavery strategy, including ensuring ongoing and new investments and suppliers undergo a modern slavery due diligence assessment communicating with suppliers, regularly reviewing internal policies and training, and updating such policies and training programs when required. VGI Partners' staff also participate in appropriate staff training.

Approval

This Modern Slavery Statement was approved by the VGI Partners Board on 21 February 2022.



Robert M.P. Luciano
Chair, VGI Partners Limited

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