



Modern Anti-Slavery  
and  
Human Trafficking Statement

June 2023

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## Apex Group

This statement is made pursuant to Section 13 (*Modern slavery statements for single reporting entities*) of the *Modern Slavery Act 2018 (Cth)* for the financial year ended 31 December 2022 in respect of Apex Fund Holdings Australia Pty Limited and its Australian related bodies corporate (“**Apex**”).

Apex is committed to combating the risk of modern slavery or human trafficking within its business and its supply chains. The Apex Corporate Social Responsibility Charter establishes our belief in respecting human rights, and this is reinforced by the Apex Group Business Values which centres on caring and the promotion of respect in our activities.

### 1. Our business

We are a global financial services organization offering a full suite of products surrounding our core fund accounting services, from regulatory solutions to middle office services, covering the full value chain for our clients.

Apex provides depositary, investment, fund accounting, fund administration, asset management, investment banking, directorship services and alternative investment services.

### 2. Our supply chain and due diligence

As a financial services company we have a limited supply chain and operate in an industry with a low risk of modern slavery. Nevertheless, Apex recognizes that the risk of slavery or human trafficking may exist in any supply chain. Therefore, Apex has committed to take adequate actions and put in place mitigants to reduce such risk.

As part of new supplier due diligence, Apex requests a copy of the supplier’s anti-slavery and human trafficking statement and/or policy, which is expected to extend to the supplier’s sub- contractors. Potential Apex suppliers are also asked to confirm that they:

- Have not committed or been notified that they have been placed under investigation for any offences relating to human trafficking and/or slavery;
- Are not aware of any circumstances within their supply chain that could give rise to an investigation or a prosecution; and
- Will comply with the *Modern Slavery Act 2018 (Cth)* and other legal standards relating to human trafficking and/or slavery.

### 3. Our effectiveness in combatting slavery and human trafficking

Apex supports the fundamental principles of human rights, such as those adopted in the United Nations’ Universal Declaration of Human Rights. We believe that upholding these principles is an important

component of our culture and values. Our commitment to fair, ethical, and responsible business practices is central to our way ahead.

We have a number of internal policies that reflect our zero-tolerance approach to modern slavery, our commitment to ethical business behaviour and slavery free supply chains. Our whistleblowing policy allows employees to highlight issues they come across, which could include matters such as supplier ethics and behaviours.

#### **4. Training and vendor management**

Individuals who are procuring services on behalf of Apex must undertake training in relation to modern slavery.

As part of our vendor due diligence process potential vendors have to confirm that they comply with the *Modern Slavery Act 2018 (Cth)* and other legal standards relating to human trafficking and/or slavery, and make certain other confirmations about their supply chain and any previous investigations or offences committed relating to human trafficking and/or slavery.

#### **5. Approval**

Apex will continue to identify and evaluate risks relating to human rights and develop policies, procedures, and training to help combat modern slavery.

This statement was approved by the Board of the reporting entity, Apex Fund Holdings Australia Pty Limited on 22<sup>nd</sup> May, 2023.



Nicholas Peter Happell  
(as Director of the Company)