



Modern Anti-Slavery
and
Human Trafficking Statement

June 2024

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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 2023 in respect of Apex Fund Holdings Australia Pty Limited and its Australian subsidiaries (“**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 centers 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 depository, investment, fund accounting, fund administration, asset management, investment banking, directorship services and alternative investment services.

We are proud to be one of the largest providers of financial services but this isn’t the only measure of our success; we strive to be a responsible corporate citizen, focused on making a difference to our people, our planet and our society.

Our ability to do good begins with our people, our greatest asset, and through them we know we will make a real difference to the world around us. As we grow as a business, so too does our drive to have an influence; to make the world a better place, to preserve our planet for future generations and to positively impact our people.

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. Potential risk

We have assessed the risk of modern slavery taking place within our business by identifying and managing any areas of concern within our operations and external supply chains.

We take into full consideration the following factors when assessing any potential risk of modern slavery in our supply chains:

- geographic risks;
- products and services that we source;
- sectors that we operate in; and
- supply chain model involved.

The categories through which Apex could be exposed to the potential risk of modern slavery and human trafficking where in parts of our business operations in countries reported by international organisations or NGOs to have a high prevalence of modern slavery. Due to the nature of our business, we do not make use of high-risk supply chains, which are generally susceptible to modern slavery risks.

4. Actions taken during the reporting year

We have continued to monitor and assess the effectiveness of the processes and procedures previously established in previous reporting years to address the modern slavery risks that our business may be exposed to.

We adopt as a baseline the fundamental principles of human rights, such as those adopted in the United Nations' Universal Declaration of Human Rights and Guiding Principles, to guide our company's culture and values. Our commitment to fair, ethical, and responsible business practices is central to our way ahead.

We continue to work on developing frameworks and internal processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains. This includes a number of internal policies and training modules that reflect our zero-tolerance approach to modern slavery, our commitment to ethical business behaviour and slavery free supply chains. We also maintain a whistleblowing policy that allows employees to highlight issues they come across, which could include matters such as supplier ethics and behaviours.

5. Process of consultation

We have engaged extensively and have consulted with the entities that Apex owns and controls. This includes detailed and frequent communication with internal teams, senior management and subject matter experts regarding information on compliance with the Act, and Apex's expectations of those entities to actively address modern slavery.

Appropriate consultation with all of Apex's owned and controlled entities has occurred throughout the reporting period, and in the preparation of this statement. All Apex entities have, and will continue, to work closely to assess and address the risks of modern slavery throughout the Apex's diverse investments and business operations

6. 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.

7. 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.

8. 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 5th June 2024.



Nicholas Peter Happell
as Director of the Company