



E&P Financial Group

Modern Slavery Statement

Financial Year Ended 30 June 2023

Introduction

This Modern Slavery Statement is made on behalf of E&P Financial Group Limited (ABN 54 609 913 457) (“E&P”), collectively and its related bodies, pursuant to the requirements of the Modern Slavery Act 2018 (Cth). Our fourth Modern Slavery statement, relating to the reporting period commencing 1 July 2022 and ending 30 June 2023, describes our continued approach to identifying and reducing the risk of slavery and human trafficking in our operations and supply chain.

E&P is committed to continually improving its systems and processes to combat Modern Slavery and human trafficking. We understand the risks of Modern Slavery to be the potential for our business to cause, contribute, or be linked to Modern Slavery through our operations and supply chains. We recognise that there are suppliers that pose a higher risk of Modern Slavery and that it can occur in many forms, such as forced labour, child labour, domestic servitude and workplace abuse.

This statement was prepared by E&P, in consultation with the respective business units/entities that E&P owns or controls. Internal stakeholders provided information on programs of work to identify and mitigate modern slavery risks. Supplier and investee company data, accessed via internal data systems were used to evaluate risks of Modern Slavery in our immediate supply chain.

During the reporting period, we continued to implement our operational Modern Slavery risk framework and deliver further simplifications to our real assets funds operations. This continues to reduce the size, complexity and associated Modern Slavery risk exposure of our supply chains. Despite this, we still recognise that there are areas of our approach that require continuing attention and improvement. As such, this statement also outlines the measures that E&P will take over future reporting periods as we continue to improve our practices to combat Modern Slavery.

This statement was approved by the Board of E&P Financial Group Limited on December 1st 2023.



David Evans
Non-Executive Chairman
E&P Financial Group Limited




About E&P

E&P Financial Group (E&P) is an ASX-listed business delivering financial services across wealth management, funds management corporate advisory, institutional sales and trading and research. We provide high-quality, trusted financial advice for individuals, families, for-purpose organisations, corporates and institutions.

E&P Wealth services over 7,400 clients, representing \$23.4 billion in funds under advice as of 30 June 2023. E&P Capital is an advisor to many leading Australian corporations and institutions through the provision of equity research, institutional sales and trading, corporate advisory, equity capital market and debt capital market services. In E&P Funds, we manage \$4.3 billion of assets across a diverse range of asset classes and strategies.

E&P has offices across Melbourne, Sydney, Canberra, Brisbane, Hong Kong and New York. We are focused on delivering long-term value to all stakeholders, including our clients, our people, and our shareholders. We recognise the importance of ethical conduct and modern slavery risk in meeting these objectives and seek to ensure our business operations and investment services are aligned accordingly.

Figure 1: Overview of E&P Financial Group Business Structure

E&P Wealth	E&P Capital	E&P Funds
		
<p>Premium private wealth management firm with presence across Not-For-Profit, Family Office, high-net-worth and mass affluent retail clients, underpinned by a contemporary advice model.</p>	<p>Leading boutique provider of corporate advisory, capital markets, institutional broking and research, occupying a unique position in the market due to client relationships, scale and focus.</p>	<p>High-quality equity fund managers with an increasingly diverse investor base.</p>

Our Supply Chains



E&P's supply chain relationships include suppliers of information technology, communications; property services (such as facilities, cleaning, utilities, waste management, building maintenance and services etc.); print and promotional goods and services; office supplies; corporate clothing; hospitality, corporate travel and transportation; courier and postage; professional services (such as consultants, recruitment, legal advice, audit, accounting advice etc.); and ad hoc event management and entertainment services.

E&P recognises that Modern Slavery is a significant global issue. We acknowledge that it is essential to review our supply chains regularly and maintain robust systems and processes to ensure that the possibility of Modern Slavery is minimised. Consistent with our prior statements, we have adopted a broad analysis of our Modern Slavery risk exposure, relating to both our direct operations (as above) and the investment management activities related to E&P Funds' operations.

Our Policies and Procedures

E&P is committed to conducting its businesses ethically and professionally. Our core values are embedded in the conduct, culture and comprehensive set of policies and procedures that our people and suppliers are expected to uphold. Our systems and processes to mitigate Modern Slavery risks include explicit supply chain management mechanisms and a series of underlying risk management measures throughout the broader group.

Table 1: Register of Related E&P Financial Group Policies and Practices

Policy	Purpose
 Fraud & Corruption Policy	Bribery and corruption in supply chains are risks that have contributed to the spread of Modern Slavery around the world. Without corrupt activity, including the acceptance of bribes, many conditions that lead to or influence the extent of Modern Slavery may not exist. E&P's policy reinforces a commitment to identify fraudulent and corrupt activities and establish policies, controls and procedures to prevent and detect these activities.
 Whistleblowing Policy	E&P's Whistleblowing Policy encourages ethical conduct by stipulating mechanisms for any current or former employees, suppliers, executives, directors, partners or contractors employed or contracted by E&P in Australia to speak up and report actual or suspected wrongdoing. It also applies to associates of E&P, and any spouse, relative or dependant of the aforementioned people. E&P's Whistleblowing Policy aims to promote a culture of compliance, honesty and ethical integrity by providing an avenue, without fear of persecution or intimidation, for the reporting of improper conduct.



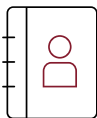
AML/CTF Program

E&P understands that the prevention of money laundering and terrorism financing is a vital component of efforts to mitigate the business' Modern Slavery risks. Money laundering in particular is closely related to Modern Slavery as this activity can help facilitate funds that were generated through illegal activities such as human trafficking. By having appropriate customer identification procedures, ongoing and enhanced customer due diligence, robust transaction monitoring rules, timely reporting of suspicious matters to the regulator and regular independent reviews of the program, E&P is able to effectively identify and manage situations where Modern Slavery may be occurring within its client base.



Employee Code of Conduct

E&P's Employee Code of Conduct helps to ensure that all employees not only act in accordance with all relevant laws, but also act in accordance with the firm's values (i.e. integrity, accountability, excellence, best interest, respect, inclusion and teamwork and meritocracy). The Employee Code of Conduct underpins all of E&P's business operations and promotes ethical business practices that mitigate the risk of E&P's business operations contributing to Modern Slavery and any other human rights abuses.



Supplier Code of Conduct

E&P's Supplier Code of Conduct (Code) sets out the minimum standards that are expected of suppliers across numerous areas including Modern Slavery, labour, human rights, bribery and corruption. The Code sets out an expectation that suppliers will manage and influence their own supply chains to adopt safe, fair and ethical approaches to their operations – including the management and mitigation of Modern Slavery risk. It is also a requirement of the Code that suppliers notify E&P if they become aware of a breach or possible breach of any of the expectations set out within the Code.



ESG Policies (Funds Management)

E&P's listed equities funds operate with environmental, social & corporate governance (ESG) policies that set out each strategy's framework for ESG integration in investment decision-making and ownership practices. While each policy is unique to each investment strategy, managers are required, at a minimum, to undertake investment due diligence to identify financially material ESG risk, and the processes undertaken by company management to mitigate that risk. Financial materiality can relate to the level of impact that identified ESG risks and opportunities may have on organisational value, corporate earnings and the future prospects of an investment. To identify these risks, investee companies are subject to ESG reviews which can include an assessment of social issues relating to Modern Slavery (such as human rights, worker's rights, corporate culture and health and safety).

Modern Slavery Risks

Direct Operations

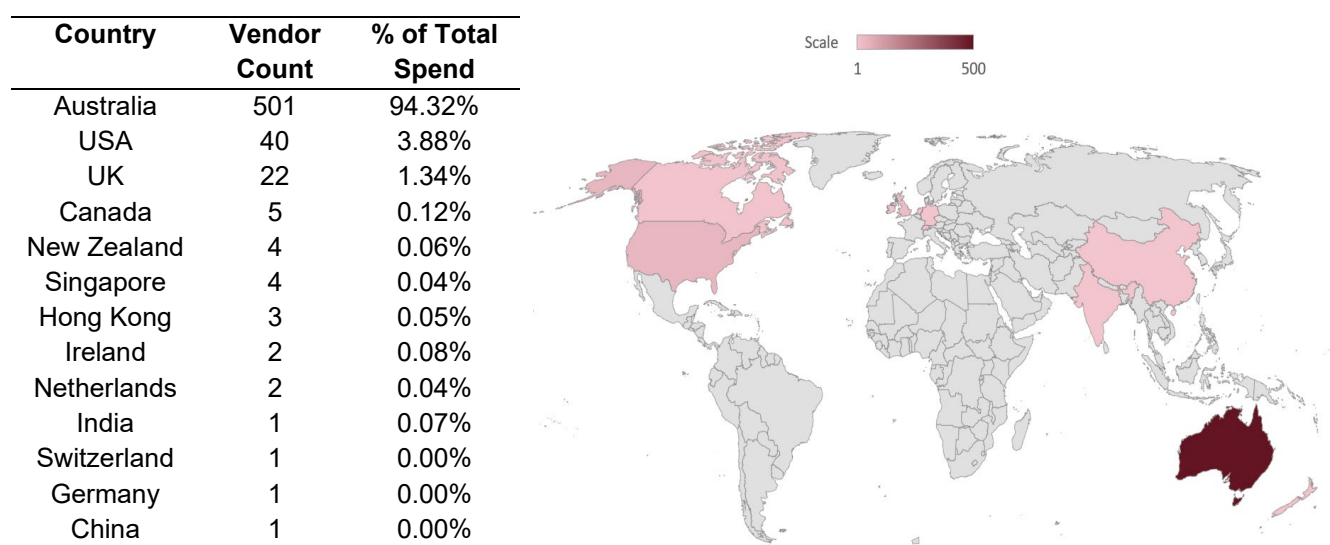
E&P maintains zero tolerance for Modern Slavery. All employees within our workforce have the right and ability to work in their applicable country (including Australia, Hong Kong or the USA), and we pride ourselves on maintaining a safe and inclusive working environment. E&P has a dedicated Chief People Officer and a dedicated Chief Risk Officer, both of which are responsible for centralised functions that oversee key programs, policies and procedures relating to business ethics and integrity and human capital management. Further detail on our approach to Human Capital Management and Business Ethics and Integrity can be found in our [FY23 Sustainability Overview](#).

Supply chains

Given our business model, geographic locations and the highly skilled nature of our employees, we have classified the risk of Modern Slavery in our direct supply chain as low. However, we also acknowledge our responsibility to assess risk beyond the first tier of our supply chain, and to pay particular attention to higher-risk industries.

Many of our tier-1 suppliers are large, established, reputable businesses, domiciled within Australia and other inherently low-risk jurisdictions (exclusively including, in descending quantum of suppliers, Australia, USA, UK, Canada, New Zealand, Singapore, Hong Kong, Ireland, Netherlands, India, Switzerland, Germany and China). Both India and China engagements relate to one supplier in each case, and both were identified as low-risk instances. E&P conducted detailed supplier due diligence for the Indian supplier providing SMSF wind-up professional services, and the Chinese engagement related to an inherently low-risk one-off consultative services with an industry expert.

Figure 2: E&P Financial Group Tier 1 Supplier Geographic Distribution



Most of the risks observed in prior periods were related to E&P's broader supply chain tiers that we do not directly engage. While E&P's overall risk exposure is low, it remains at a proximity that is challenging to engage with. This reaffirms the appropriateness of the current E&P framework; rigorously screening tier-1 suppliers to ensure they are also taking appropriate steps to measure and manage their supply chains.

Equities Funds Management

Within our equity portfolios, we have identified exposures to several global companies with moderate risks of Modern Slavery through their supply chains. With broader geographical reach, more complex supply chains, and material exposure to industries such as resources and manufacturing, these companies typically observe greater risks at a closer proximity, compared to E&P's direct operations.

However, given that many of these investee companies are large, global organisations with regulatory obligations in their jurisdictions of operation to mitigate Modern Slavery risk, we note many have strong policies, and governance processes – being required to undertake due diligence and remediation actions within their supply chains. For this reason, we believe many of these exposures are materially de-risked and therefore 'low' risk.

Investments and proxy engagements are assessed in accordance with the relevant ESG policies, such as the [Claremont Global ESG & Advocacy Policy](#) and [Orca Global Disruption Fund ESG & Advocacy Policy](#).

Real Assets Funds Management

In previous periods, we had identified exposure to several higher-risk areas within real assets portfolios – in particular cleaning and janitorial services, and non-residential solar construction. Through the FY22 and FY23 periods, our Modern Slavery risk exposure through real assets portfolios has been significantly reduced due to material operational simplifications in our real estate and solar-related activities.

Since FY22 the business has completed asset sales and operational restructures across New Energy Solar, the US Masters Residential Property Fund and the Fort Street Real Estate Capital Fund. During the FY23 period, E&P ceased acting as the Responsible Entity for the Fort Street Real Estate Capital Fund.

While E&P remains the current investment manager of the UK-listed US Solar Fund PLC (expected cessation of that role in FY24), that fund has now been fully deployed, minimising material procurement activities and thus negating the extent of extensive new supplier exposure and requisite due diligence. Modern Slavery risk management primarily relates to ongoing asset management, in a low-risk jurisdiction. Further details on the approach followed and detailed disclosures relating to human rights issues can be found in the [USF CY22 Sustainability Report](#), including the letter from the investment manager (commencing page 4) and SFDR disclosures (commencing page 28).

While these developments materially reduced the size, complexity and associated Modern Slavery risk exposure of our real assets supply chains, E&P asset management teams continue to perform detailed due diligence and supplier engagement as additional high-risk activities are identified.

Modern Slavery Risk Mitigation Actions

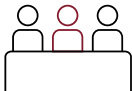
E&P is committed to ensuring that Modern Slavery is not part of our organisation or our supply chains. To date, our strategy for minimising Modern Slavery risk exposure has included four components:

1. Staff education and awareness;
2. Supplier onboarding (including screening and adherence to our code of conduct);
3. Detailed due diligence for high-risk suppliers; and
4. Remediation and advocacy.

For the FY23 period, E&P has focussed on delivering our internal policies and processes, as well as educating our staff on the issue of Modern Slavery, to help identify and mitigate any Modern Slavery risks identified. This leverages foundational process-oriented work completed in prior periods.

During the FY23 period, no reactive supplier engagement or remedial action was required relating to E&P's direct supply chain or real assets under management; no shareholder advocacy actions were required by E&P Funds Management teams while proxy voting practices continued to consider enhanced supply chain governance among investee companies on an ongoing basis.

Table 2: Initiatives Completed in FY23

Area	Details
 Training & education	<p>E&P recognises the importance of educating employees about Modern Slavery; particularly procurement teams and investment managers who are exposed through their engagement with suppliers. E&P maintains a commitment to ensure staff are provided adequate training and resourcing to enable robust supplier engagement, noting the importance of the role staff play in reducing the risks of Modern Slavery.</p> <p>During the FY23 period, E&P delivered specialised training for targeted team members across senior executives, funds management personnel, procurement teams and specialist advisers on Modern Slavery risk identification, impacts and obligations for the financial services sector. Selected new employees (with procurement and oversight functions) were also required to complete initial Modern Slavery training as part of our onboarding processes.</p> <p>Compliance attestations relating to staff and company obligations under the Modern Slavery Act and Third-Party Management Framework are also completed by all staff annually.</p>



Supplier code of conduct

E&P introduced a Supplier Code of Conduct ('Code') for relevant suppliers from the FY22 period onwards. The Code articulates minimum standards that are expected of suppliers across numerous areas including Modern Slavery, labour, human rights, bribery and corruption. The Code sets out an expectation that our suppliers will manage and influence their supply chains to adopt safe, fair and ethical approaches to their operations – including the management and mitigation of Modern Slavery risk. It is also a requirement of the Code that suppliers notify E&P if they become aware of a breach or possible breach of any of the expectations set out within the Code.

During the FY23 period, the Code was reviewed to ensure ongoing relevance and continued to be rolled out through the onboarding of relevant suppliers, guided by the Third Party Management Framework.



Third Party Management Framework

During the FY22 period, E&P implemented a Third Party Management Framework. As a part of this introduction, dedicated third-party and contract registers were built into our Governance, Risk and Compliance (GRC) software system to track vendor onboarding and due diligence. This will help systemise the firm's modern slavery approach and include explicit modern slavery screening considerations, self-assessment surveys, and the ability to record ad-hoc due diligence.

The Third Party Management Framework applies to Third Party arrangements meeting one or more of the following criteria:

- under outsourcing arrangements;
- where the relationship is inherently high risk (e.g., based on industry, geography, or activity type); and/or
- the cost is greater than \$100k per annum.

Third Party arrangements which do not meet these criteria may still apply the Third Party Management Process to minimise third party risk. Following the initial migration of key existing suppliers in FY22, E&P continued to utilise the framework and system with all new suppliers onboarded during FY23.



Supplier/ investment due diligence

As part of establishing a formal approach to identify and manage Modern Slavery risks in the supply chain, E&P has developed and utilises a series of self-assessment questionnaires for use with third party suppliers, guided by and integrated in the Third Party Management Framework.

During the FY23 period, E&P conducted several distinct instances of modern slavery due diligence via direct engagement with service providers, triggered through screening of inherent risk prior to onboarding. These related to service providers (e.g., SMSF audit and windup service providers, marketing agencies and superannuation auditors), some of which maintained operations and/or people located in higher-risk geographies. Clarifying documentation obtained through direct engagement with the suppliers provided an understanding of

process management and satisfactory residual risk. Examples of the assessments and risk factors analysed included the nature of the workforce (skilled, tertiary educated), remuneration structure employed (above local market rates), provision of allowances (including superannuation, and medical benefits), level of supplier oversight (direct employment and/or exclusive contracting arrangements), and extent of explicit modern slavery policies, procedures and reporting.



Remediation & Advocacy

In the event of Modern Slavery being identified in E&P's supply chain, E&P is committed to taking remedial action. Given the unique nature of each company, industry and supplier, each plan for supplier engagement will be executed in a tailored way; aiming to analyse the contributing factors and execute the requisite remedy processes. No such supplier engagement and remedial actions were required during the FY23 period.

If Modern Slavery risks are identified within an investee company, E&P is committed to ensuring that funds management staff engage directly with the investee company's management to resolve concerns raised; advocating that investee companies take meaningful action to address Modern Slavery risks and prevent further issues from arising. As active stewards of investor capital, E&P make a commitment to vote on all resolutions put forward by portfolio companies, with due consideration given to ESG issues, including Modern Slavery.

While no actions were required during the FY23 period, our funds management teams continue to monitor these issues in line with their ESG policies. Further detail can be accessed through the FY23 Proxy Voting updates for our core equities strategies, [Orca Global Disruption Fund](#) and [Claremont Global Fund](#).

Monitoring, Evaluation & Review

Assessing the effectiveness of our efforts

During the FY23 period, E&P elected to focus on the below key performance indicators (KPIs) related to our modern slavery efforts. As this is E&P's fourth Modern Slavery Statement, our processes, procedures and means to measure the effectiveness of modern slavery risk management have continued to evolve as programs are evaluated and additional initiatives are introduced.

Table 3: Progress on key performance indicators

Indicator or Target	Progress	Status
Staff training on modern slavery risks and practices	<p>E&P delivered external training for senior executives, funds management personnel, procurement team members and specialist advisers on Modern Slavery risk identification. Over the FY22 and FY23 periods, a total of 54 hours of mandatory online training was completed, at an average of 1.3 hours per employee, across these targeted teams. These years are aggregated, as the program roll-out was extended across both periods. Further, in person training was delivered in FY22, in addition to these hours.</p> <p>During the FY23 period additional targeted individuals (including new employees) completed mandatory Modern Slavery training. Separately, risk and compliance attestations were completed by all staff to verify individual acknowledgement of staff and company obligations under the Modern Slavery Act and Third Party Management Framework.</p>	On track Ongoing
Third Party Management Framework	<p>All applicable vendors onboarded since E&P's Third-Party Management Framework was brought online (from FY22 onwards) formally passed through the Third Party Management Framework. This involves line manager assessment of high risk attributes and where applicable, due diligence assessment and documentation lodged within our Governance, Risk and Compliance (GRC) software system. To date, 73 suppliers (based on Third Party Management Framework applicability) have been recorded in the GRC system. This data reflects the low-risk nature of our supply chain.</p> <p>The migration of existing suppliers to these systems continued through the FY23 period through the supplier contract renewal process. As well as vendor renewals, 191 new vendors (not engaged during FY22, FY21 or FY20) were engaged during FY23. Following assessment, a small number met one or more criteria of the Third Party Management Framework, and three triggered instances of detailed supplier due</p>	On track Ongoing

diligence. All detailed assessments found low residual modern slavery risks.

With the Third Party Management Framework reaching full establishment in FY23, further work will be undertaken in future periods to enhance user application and data quality to improve management and risk oversight.

Supplier Code of Conduct provided to suppliers

The E&P Supplier Code of Conduct (which articulates the Modern Slavery expectations of third-party suppliers) began during the FY22 period. This was implemented as standard practice during the FY23 period, guided by the Third Party Management Framework.

Supplier coverage has steadily increased as supplier contract renewals and resultant migration to the Third Party Management Framework continue to occur. As system implementation and data tracking improves, we aim to benchmark and report appropriate measures of progress – noting the commitment to report statistics once the program reached maturity.

**For review
Ongoing**

Completion of supplier due diligence for higher risk suppliers

E&P undertook detailed Modern Slavery due diligence (in excess of regular vendor onboarding due diligence processes) on a select number of suppliers during the FY23 period. This is guided by flagging of risk indicators through the implementation of the Third Party Management Framework.

Detailed due diligence via direct supplier engagement was conducted on three new supplier relationships (two suppliers in FY22), where inherent risk flags (e.g., high-risk geography, employee outsourcing and high-risk industries) were identified. These related to professional services, marketing and financial services providers. Due diligence processes found satisfactory residual risk; due to sound governance, the presence of skilled labour, and measures to ensure equitable workplace conditions.

To ensure continued improvement in the application and implementation of screening processes, current systems will be reviewed in future periods, along with systems associated with the Third Party Management Framework and Supplier Code of Conduct.

**Responsive
Ongoing**

Recorded instances of Modern Slavery within supply chains

To the best of E&P's knowledge, there have been no recorded instances within the last reporting period for companies/suppliers we are exposed to that have identified incidents of Modern Slavery in their own supply chains.

**Responsive
Ongoing**

Process for Review and Consultation

We review our policies and frameworks that address Modern Slavery annually or more frequently as required. These reviews are overseen by the Board, our internal ESG team, our Risk & Compliance team, and senior management. This ensures that program and policy reviews address regulatory requirements and stakeholder expectations appropriately and seek effective amendments where needed. Our internal management teams consider group-wide and cross-functional factors, reflecting industry Modern Slavery expectations, and ensuring the relevance of KPIs.