

# The Epoch Holding Group

## Modern Slavery Statement September 2021

This statement is made in accordance with the Modern Slavery Act 2018 (Cth). This is a joint statement made by the The Epoch Holding Group Pty Ltd on behalf of the following reporting entities:

- The Epoch Holding Group Pty Ltd (ACN 169 456 517)
- Epoch Capital Pty Ltd (ACN 128 329 395)

## Consultation with entities in the group

This joint statement has been prepared in consultation with each reporting entity.

Epoch Capital Pty Ltd is wholly owned and controlled by The Epoch Holding Group Pty Ltd. All entities in the group are managed under a common framework of policies and systems and operate in the same sector with many shared suppliers. This common framework means that this single consolidated statement is appropriate to cover both reporting entities and has been made in consultation with all entities in the group (collectively referred to from herein as **Epoch**).

Epoch manages its supply chain data centrally with common policies and systems for all entities in the group. The supply chain risk and structural and operational risks were assessed for the group as a whole with a consistent approach to identification and management of risk.

The statement has been prepared following a review of the operations of Epoch in 2021.

## Structure, Operations and Supply Chain

Epoch conducts proprietary trading and provides financial services through a number of subsidiary entities from offices in NSW, the UK and the US.

Epoch carries out electronic trading in derivatives and spot fx with direct market access to major trading venues.

Epoch has simple supply chains including professional advisers and consultants, IT, brokerage and banking, office equipment, building and maintenance, courier services, corporate travel and hospitality.

This statement has considered the operations of all the entities in the group.

## Risks of Modern Slavery Practices

Due to the nature and scale of its operations, we did not identify any risks of modern slavery in Epoch's structure or operations.

The potential risks associated with Modern Slavery are primarily in the supply chain. The nature of our suppliers means that we assess the risks of Modern Slavery as low.

## Actions taken to assess and manage risk

Epoch has assessed its supply chain based on the size, industry sector and operating jurisdiction of our suppliers. We did not identify any incidents, indicators or risk of modern slavery with our suppliers. We will continue to develop and improve our due diligence processes with our suppliers to ensure that we do not contribute to any risk of modern slavery.

## Measuring Effectiveness

Epoch will continue to monitor compliance by reviewing any potential indicators of Modern Slavery in its supply chain and reviewing any adverse news connecting any supplier to modern slavery.

## Approval

This Modern Slavery Statement is made by The Epoch Holding Group Pty Ltd and its reporting entities.

This statement was approved by the Sole Director of The Epoch Holding Group Pty Ltd on 27-Sep-2021

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**DocuSigned by:**



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**Michael Humphreys**

Sole Director and Chief Executive Officer  
The Epoch Holding Group Pty Ltd  
27-Sep-2021