

Modern Slavery Statement 2024

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 Global Investments Limited ACN 619 660 721 (**VG1**).

This Statement sets out the steps we have taken during the financial year ended 30 June 2024 to prevent modern slavery in our business and supply chains.

VG1 has a zero-tolerance approach to modern slavery within its organisation and supply chain. At VG1, we recognise that human rights is an area of importance to our 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.

VG1's exposure to modern slavery risks emanate from two primary sources – our investment activities, and our procurement of services through supply chains/service providers.

VG1 business, operations, and supply chain

VGI Partners Global Investments Limited (ASX:VG1) publicly listed on the Australian Securities Exchange on 28 September 2017. VG1 provides investors with access to a concentrated portfolio, comprised of long investments and short positions in global listed securities. The portfolio is actively managed by Regal Partners Limited (**the Manager**).

While VG1 has a Board of Directors, it does not have employees, as all personnel engaged in VG1's investment management process are employed by the Manager.

VG1 Investment Process

VG1's investment process is performed by the Manager. The Manager is part of the RPL Group which has adopted a common set of Modern Slavery policies, procedures and labour standards across the investment management operations conducted by the Manager and certain other group entities including Regal Funds Management Pty Ltd. The Manager is a Reporting Entity which has lodged a Modern Slavery Statement summarizing these common Modern Slavery policies, procedures and labour standards.

VG1 has reviewed the Manager's Modern Slavery Statement for the 12 months to 31 December 2023 and has received a Modern Slavery report in relation to the Manager's investment management operations covering the reporting period.

VG1 Supply Chain/Service Providers

VG1 and the Manager have contractual relationships with some of the best-in-industry service providers both in Australia and internationally. Their service providers include:

- Prime brokers and broker service providers
- Information technology service providers
- Share registries
- Audit, advisory, legal, compliance and governance service providers

The Manager conducts due diligence on VG1's suppliers and has incorporated specific due diligence questions relating to modern slavery in its vendor due diligence process.

Identified and addressing supply chain risks

While we had no direct knowledge of modern slavery taking place within our Manager's investment operations or our primary service providers during the financial year ending 30 June 2024, VG1 will continue to undergo a due diligence process to ensure VG1 is not contributing to any forms of modern slavery.

Our policies and procedures

In addition to this Statement, VG1 maintains related policies/programs including the following:

- Code of Conduct – sets out the standards that VG1's directors, employees, contractors and consultants (if any), and the Manager's investment team and personnel are expected to observe;
- Whistleblower Policy – sets out VGI's policies in respect of whistleblowers and encourages disclosure of wrongdoing and reporting of issues

VG1 will continue to evaluate the effectiveness of its policies and procedures on combating modern slavery practices. When required in accordance with the Act, VG1 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

The VG1 Board oversees the operation and continued effectiveness of VG1's modern slavery strategy, including seeking confirmation from the Manager that ongoing and new 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.

Controlled Entities

This statement is issued on behalf of VG1 only. VG1 does not own or control any other entities.

Approval

This Modern Slavery Statement was approved by the VG1 Board on 22 October 2024.



David F. Jones

Chairman, VGI Partners Global Investments Limited

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