

Version Control	
Policy Title	Modern Slavery Statement
Policy Owner	Board
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1. Introduction

1.1 As an Australian entity carrying on business in Australia with consolidated revenue of at least \$100 million in the prior financial year, Shaw and Partners Limited ("**Shaw**") is a reporting entity under the Modern Slavery Act 2018 (*Cwlth*) (the "**Act**"). As a reporting entity Shaw is required to prepare and lodge an annual modern slavery statement with the Minister of Home Affairs within 6 months of the end of the financial year that is:

- compliant with the mandatory content requirements set out in section 16 of the Act;
- prepared in the correct form for the Minister to approve;
- approved by the principal governing body of Shaw; and
- signed by a responsible member of the entity.

1.2 This modern slavery statement sets out the risks of modern slavery in Shaw's operations and supply chains and provides information about the actions taken by Shaw to address those risks. This statement has been approved by Shaw's principal governing body, the Shaw Board of directors.

2. Business Operations and Supply Chains

Structure

2.1 Shaw is an unlisted public company governed by a board comprising of executive and non-executive directors and a chairman. Shaw is majority owned by EFG International a Swiss-based private bank listed on the SIX Swiss exchange. The remaining shares are held by Shaw's co-CEOs and others.

2.2 Shaw also operates a number of wholly-owned subsidiaries:

- Shaw and Partners Financial Planning Pty Limited, ACN 612 483 619 – for the provision of financial planning services;
- Melbard Nominees Pty Limited, ACN 003 802 828 – a nominee company;
- McNeil Nominees Pty Limited, ACN 003 207 592 – a nominee company;

- Shaw and Partners Corporate Finance Pty Limited, ACN 101 193 971; and
- Shaw and Partners Foundation, ABN 94 768 298 774.

2.3 Shaw's senior management team comprises Shaw's co-CEOs, the Chief Operating/Financial Officer, Chief Compliance Officer, Chief Investment Officer, General Counsel, Head of Equities, Head of Research and Head of Capital Markets. Shaw maintains a compliance and management plan identifying and detailing the responsibilities of supervisory staff and a risk management framework that details risk appetite, roles and responsibilities and risk monitoring and testing.

2.4 In addition, Shaw maintains an Audit, Risk and Compliance Committee of senior staff and chaired by a non-executive director of Shaw which meets under charter regularly to review its risk framework, compliance testing results and audit arrangements.

2.5 Shaw operates a licensee and authorised representative structure. As a result, Shaw's private wealth advisers are not employees of Shaw, instead each retains Shaw's services via a services agreement.

Operations

2.6 Shaw is an Australian financial services licensee and an ASX and Chi-X Australia Market Participant. Shaw is one of Australia's preeminent investment and wealth firms with a national presence and approximately \$20 billion of assets under advice. Shaw provides tailored advice and investment solutions, financial planning and corporate advisory services for retail and wholesale clients. Shaw acts for and on behalf of individuals, institutions, corporates and charities. Shaw offers access to an extensive team of private client advisers, institutional sales and trading specialists, market-leading research analysts and strategic corporate financiers.

2.7 Shaw's core services include:

- **Wealth management** – Shaw manages wealth by identifying investment opportunities while actively managing the inherent risks that come with investing;
- **Portfolio management solutions** – providing a tiered approach to portfolio management services to help clients manage their investments efficiently;
- **Financial planning** – comprehensive investment service that combines Wealth Management and Financial Planning expertise, providing tailored solutions to manage and grow wealth;
- **Corporate advisory** – offers the full suite of corporate advisory services creating value for clients and their stakeholders;
- **Institutional dealing** – client-focused advice, efficient trade execution and quality research for institutional clients seeking access to Australian equity markets; and
- **Research** – timely, insightful research and investment strategies aimed at unlocking investment opportunities.

2.8 The primary risks of modern slavery practices in Shaw's operations are that that employees are subject to servitude, forced labour or debt bondage, e.g. where a person is coerced to work through the use of violence, intimidation or accumulated debt.

Supply Chains

- 2.9 In the operation of its business Shaw employs or engages a number of vendors and suppliers for the provision of goods and services, including the provision of market execution services, third party clearing and settlement services and the provision of various systems and applications to facilitate Shaw's day-to-day business operations. Shaw has identified and regularly reviews service providers that it considers critical to its business operations as part of its business continuity and disaster recovery planning.
- 2.10 In addition to critical service providers Shaw also employs or engages other vendors and suppliers for the provision of specific services including services relating to building maintenance, post and courier, catering and other general office administration.
- 2.11 The primary risks of modern slavery practices in Shaw's supply chains are that employees of vendors/suppliers are subject to servitude, forced labour or debt bondage (e.g. where a person is coerced to work through the use of violence, intimidation or accumulated debt), human trafficking or forms of child labour.

3. Risk Assessment and Management

- 3.1 Shaw is committed to ensuring that its supply chain is free of slavery and/or human trafficking. To identify and manage the risk of modern slavery and/or human trafficking in its business operations or supply chains Shaw has implemented a series of policies, guidelines, processes and procedures to identify, manage, mitigate or avoid the relevant risk, including the following:
- Compliance Manual;
 - Management and Compliance Plan;
 - Risk Management Framework and Risk Appetite Statement;
 - AML Program;
 - Anti-bribery and Anti-corruption Policy;
 - Discrimination, Harassment and Workplace Bullying Policy;
 - Whistleblowing Policy;
 - Breach Monitoring, Escalation and Reporting Policy; and
 - Contract approval process.
- 3.2 In accordance with Shaw's risk management framework and risk appetite statement, Shaw maintains a key risk register with identified key controls that manage the identified risks. Key controls are tested on a regular schedule by Shaw's dedicated 2nd Line Compliance team with results reported to control owners and the Audit, Risk and Compliance Committee.
- 3.3 In addition, Shaw's Compliance team also monitor compliance with internal policies and obtains regular attestations from staff confirming compliance with specific internal policies and controls.
- 3.4 For new engagements with suppliers/vendors, Shaw's contract approval process includes due diligence on potential service providers prior to engagement. For existing suppliers/vendors Shaw undertakes a regular risk review considering the product/service provided, the frequency with which

Shaw uses the product/service, any public statements relating to modern slavery published by or on behalf of the entity and the likelihood of modern slavery being present in the relevant supply chain.

- 3.5 Shaw has considered the overall inherent and residual risk of modern slavery in its operations and supply chains and on the basis of the structure, nature and scale of Shaw's business operations as well as the controls in place and the monitoring framework, has assessed that risk to be low.

A handwritten signature in black ink, appearing to read 'Allan Zion', with a small dot at the end.

Allan Zion

Co-Chief Executive Officer
Shaw and Partners Limited