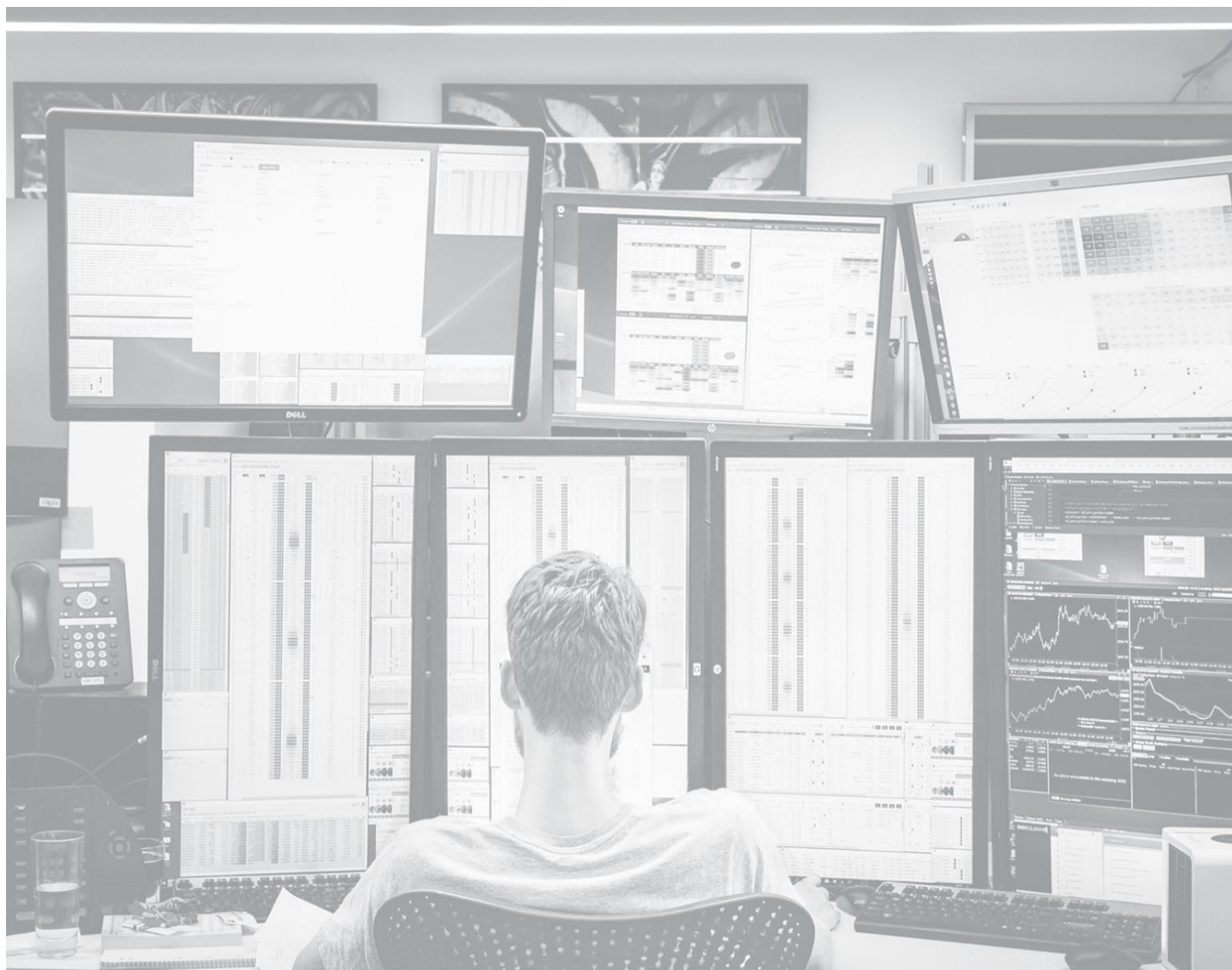


VIVIENNE COURT HOLDINGS PTY LTD
MODERN SLAVERY STATEMENT
for the financial year ended 30 June 2022



VIVCOURT

The Reporting Entity

This is the annual Modern Slavery Statement for Vivienne Court Holdings Pty Ltd and the entities it controls (per the organisational chart below) (collectively referred to as **VivCourt**) for the financial year ended 30 June 2022 and has been prepared in accordance with the requirements of the *Modern Slavery Act 2018* (the Act).



VivCourt consulted with each entity to ensure a consolidated statement was submitted. VivCourt policies and procedures apply to the group as a whole

As of the date of this Statement, VivCourt employed 119 team members. 94 members of the team working predominantly from Sydney with small teams in each Melbourne, Brisbane, Hong Kong and Amsterdam.

VivCourt continuously aims to align our work, operations and suppliers with partners who share our core values, including the use of social enterprise organisations as our support service providers.

VivCourt's structure, operations and supply chains

VivCourt is a proprietary trading company with our Head Office in Sydney Australia. We trade financial products on markets across the globe.

Our supply chain, and therefore our key risk areas, includes the development, installation and maintenance of bespoke technology solutions to support our internal trading strategies. Our supply chain includes hardware suppliers, telecommunications suppliers and financial market settlement providers. The secondary level of our supply chain includes suppliers our general operations, including property agents, insurance providers, cleaning and catering services. We understand that the provision of, including the manufacturing of some of these goods, may take place in high risk countries.

Risks of modern slavery practices in VivCourt's operations and supply chains

With reference to the Modern Day Slavery resources supplied by the Australian Government, together with reference data and resources from non government organisations, VivCourt understands that although we are in a low risk sector, the following areas of our supply chain fall within higher risk sectors and may use offshore manufacturers for parts and/or assembly that may be located in countries reported as having a higher prevalence of modern slavery:

- technology and hardware suppliers
- office supply providers
- cleaning services

Actions Taken to Assess and Address Risk

VivCourt partners with trusted suppliers as a means to minimise the risk of modern slavery in its supply chains. Through open and transparent communication, we aim to identify risks of modern slavery in our supply chains.

VivCourt engages cleaners and caterers from the not for profit sector which has a secondary effect of minimising the risk of modern slavery practices.

In addition, Vivcourt has implemented a number of policies and procedures which reduce the risk of modern slavery including:

- Our Code of Conduct
- Our Anti-Money Laundering and Counter Terrorism Financing Policy which covers our compliance obligations with respect to suspected proceeds of crime including those derived from proceeds of crime including modern slavery.

Further, VivCourt has previously engaged The Freedom Hub to prepare a project plan to review VivCourt's modern slavery risks.

Assessing the Effectiveness of our Actions

Vivcourt will continue to seek our partners to assist with supply chain screening tools and to raise awareness of the risks of modern slavery in our staff training. We will also work with partners to include modern slavery risk awareness in our existing policies and in employee training.

Consultation

This statement is provided on behalf of Vivienne Court Holdings Pty Ltd and the entities that it controls. VivCourt entities share the same director and executive teams and employees. Vivcourt entities adopt the same policies and processes and share the same supply chain.

This statement was approved by the Board of Directors / management of VivCourt:

Signed for and on behalf of VivCourt:



Robert KELDOULIS
Director, Vivienne Court Holdings Pty Ltd and CEO of VivCourt

Date 30 Dec 2022