

MODERN SLAVERY STATEMENT

21 December 2022

The federal *Modern Slavery Act 2018 (Cth)* requires mandatory reporting and disclosure on the following criteria.

1. The reporting entity to which this Modern Slavery Statement applies

The reporting entity is Wingate Group Holdings Pty Ltd ACN 128 511 035 (**Wingate**).

Wingate is a pre-eminent Australian private markets finance and investment house. Its success is built on its ethical approach, deep capabilities in debt and capacity to inspire trust in its partners.

Wingate manages approximately A\$3 billion of assets across its key business units: Wingate Property, Wingate Corporate Investments, Funds Management, ORDE Financial and FIFO Capital.

Wingate is based in Melbourne and has offices across Australia employing approximately 108 people.

Wingate has no operations outside Australia and has no contractual relationships with suppliers not operating in Australia. However, Wingate has a small number of joint ventures outside Australia and has a number of investments in New Zealand, the United Kingdom and United States. Apart from a limited number of reputable IT suppliers who are based outside Australia but have an Australian presence, Wingate sources all of its products and services in Australia.

Wingate has assessed the risks of modern slavery in its products, services and supply chains as very low.

2. Wingate's structure, operations and supply chain activities undertaken to pursue its business activities and objectives in Australia

2.1 STRUCTURE

Wingate is a private company incorporated in Australia. It has a diverse shareholder base comprising Wingate executives, institutional investors and sophisticated individual investors.

Wingate operates only in Australia, with no overseas operations or staff employed outside of Australia. It has a small number of joint ventures outside Australia and has a number of investments in New Zealand, the United Kingdom and United States.

2.2 OPERATIONS

Wingate has the following key business units within its corporate structure.

Wingate Property

Wingate Property is a specialist direct property investor and financier, providing funding solutions across the capital structure for property owners and developers, and investment opportunities for investors.



Wingate Corporate Investments

Wingate Corporate Investments invests in mid-market businesses by providing funding solutions with a focus on credit. It provides capital for growth, acquisition, working capital, bridge financing and loan books.

Funds Management

Funds Management is the capital raising business within Wingate. Funds Management is focused on investor acquisition and relationship management, private markets and institutional capital raising, product development, fund and portfolio investment management and delivery of optimal capital solutions and allocations.

Residential and Commercial Mortgages (ORDE Financial)

ORDE Financial is a specialist residential and commercial property lender providing loans of up to A\$5 million secured by first mortgage over property.

Invoice and Supply Chain Finance (FIFO Capital)

FIFO Capital offers innovative invoice, supply chain and trade finance solutions for small to medium sized enterprises (**SMEs**) and corporates through a network of business partners.

2.3 PRODUCTS

Wingate provides investors with access to private debt or equity investment opportunities across the property and corporate asset classes. Wingate's investment products are structured predominantly as managed investment schemes (unit trusts) or direct individual investment opportunities.

Investment products

Wingate's flagship investment offering is the Wingate Investment Partners Trust (**WIP**). WIP has over A\$1 billion of assets under management and invests in a diversified portfolio of secured private debt opportunities. These investments are originated by Wingate across the property, property construction, residential property, corporate and SME sectors.

Other investment products include:

- a) the Wingate Property Senior Debt Fund (**WPSD**), which invests in senior secured property debt opportunities in Australia; and

- b) the Wingate Corporate Credit Funds (**WCCF1 and WCCCF2**), which invest in loans to mid-market companies in Australia and New Zealand and discounted debt securities on secondary markets.

Investors are also invited to co-invest alongside Wingate on an investment-by-investment basis when other opportunities arise.

Wingate's investment products are designed and established in Australia by Wingate employees, with independent input from specialist advisors such as law, tax, and accounting firms.

Wingate has an established process to assess investors from an anti-money laundering and a wholesale investor perspective under the *Corporations Act 2001* (Cth) to ensure that it "knows its clients".

Funding products

Wingate provides capital (either debt or equity) to domestic property developers, property investors, home owners, corporates, SMEs and financiers in Australia.

Wingate's funding solutions are designed and established in Australia by Wingate employees with input from property valuers and specialist advisors from law, tax and accounting firms.

Investment opportunities are thoroughly assessed by senior business executives and respective credit and investment committees to formally sign off on each investment. Funding solutions are flexible and designed to best fit each individual opportunity, taking into account the relevant risks and circumstances.

Wingate does not have control over the subsequent actions of the entities and individuals in which it invests, or to whom it lends money (outside of the contractually agreed terms of the arrangement), and we note that we are not required to monitor or report on the downstream supply chains of these investee entities or individual borrowers.

2.4 SUPPLY CHAINS

Wingate, as a professional investment firm based in Melbourne, uses suppliers in the normal course of its business, such as IT, telecommunications, the rental of premises, printing and stationery, and catering.



Wingate, as a financial services firm, does not have deep and extended supply chains of products and services that are used in the production of Wingate's products.

Wingate contracts with Australian firms for the supply of these products and services.

3. The risks of modern slavery practices in the operations and supply chains of Wingate and the entities that it owns or controls

We note that risks of modern slavery practices involve the potential for Wingate to cause, contribute to or be directly linked to modern slavery through its operations and supply chains. In other words, the risks that Wingate may be involved in modern slavery, resulting in risks to people, rather than risks to its business, for example, reputational.

The risks of modern slavery practices in Wingate's operations may exist in the following ways.

3.1 INVESTMENT PRODUCTS

Funds from individuals or entities received into Wingate's investment products may have been derived from modern slavery practices, in a way similar to funds derived from other types of criminal activity. The level of this risk depends on the location of the investment, the industry, the type of service and the level of control in the organisation.

3.2 FUNDING PRODUCTS

Wingate's funding products may fund individuals or entities who engage in modern slavery practices. For example, a Wingate funding product may fund the construction of a development involving the use of labour subjected to modern slavery practices. There is therefore a risk that provided funds or assets could be used in companies or projects that exploit people for personal or commercial gain, resulting in modern slavery. The level of this risk depends on the location of the investment, the industry, the type of service and the level of control in the organisation.

3.3 OPERATIONS

Wingate only operates in Australia and employs staff according to current federal and state legislation.

Appropriate processes are in place to monitor payroll and working conditions, and to ensure appropriate employment contracts and controls are in place.

The risks of modern slavery practices within the operations of Wingate are extremely low.

3.4 SUPPLY CHAINS

Wingate uses the products and services of a range of suppliers who may engage in modern slavery practices, although this risk is assessed as very low.

4. The actions taken by Wingate and the entities that it owns or controls to assess and address those risks, including due diligence and remediation processes

Wingate conducts due diligence to identify, prevent, mitigate and account for the risks of modern slavery in its products, operations and supply chains, and executes controls that are proportionate to, and appropriate for, managing the specific nature of these risks.

Wingate understands the risk landscape of its investment products, funding products, operations, and supply chains, and has devised appropriate controls and responses to address these risks.

Wingate has assessed the risks of modern slavery in its products and services as very low and has responded to these very low risks as follows.

4.1 INVESTMENT PRODUCTS

Wingate undertakes a due diligence process in relation to individuals and entities who invest in Wingate's investment products in respect of anti-money laundering and wholesale investor status. Insofar as is possible, this due diligence process determines the likely source of the investment funds and mitigates the risks that the funds have been derived through modern slavery practices.

4.2 FUNDINGS PRODUCTS

As noted above, in assessing whether to invest in, or lend money to, an individual or an entity, Wingate undertakes a stringent due diligence process to ensure that the individual or entity is worthy of the investment or loan.



This due diligence process involves a consideration of whether the individual or entity is likely to comply with the laws and regulations that apply to its business and whether that individual or entity is likely to operate in an ethical manner.

4.3 OPERATIONS

Wingate's operations, conducted solely in Australia, are conducted in full compliance with federal and state laws and regulations.

None of Wingate's services are outsourced overseas.

Wingate has a Whistleblower Policy, and all employees are able to report any unethical activities that they observe, anonymously if required.

4.4 SUPPLY CHAINS

Apart from a limited number of reputable IT suppliers based outside Australia, but having an Australian presence, Wingate sources its input products and services from Australian companies and has a documented process for the appointment of suppliers.

To the extent that Wingate may enter into significant supply contracts, Wingate will consider assessing potential suppliers and business investments in relation to risks of modern slavery, and may incorporate enquiries and questions associated with modern slavery in our due diligence procedures.

Wingate may include in significant supply contracts a modern slavery provision, requiring representations, warranties and undertakings in relation to modern slavery.

4.5 REMEDIATION

If we become aware of potential modern slavery practices occurring in our operations or supply chains, we will take appropriate steps to ensure the matter is addressed and, where necessary remediated. The remedial action we will take will depend on the circumstances.

5. How Wingate assesses the effectiveness of such actions

The modern slavery regime is the jurisdiction of Wingate's Risk & Compliance Committee (**RCC**), which is responsible for managing all risks and compliance at Wingate. The RCC employs an overarching framework that documents all risks identified by Wingate, and the actions implemented to address these risks, to help ensure that all risks are appropriately identified and suitable mitigating actions are taken.

Business units in Wingate are represented by members of the RCC. Modern slavery has been added to the RCC's Governance Calendar for annual review.

The RCC is responsible for drafting this Modern Slavery Statement (**Statement**) and recommending it to the Wingate Board. The RCC will manage the implementation of the Statement, in conjunction with Wingate's legal team, in the event of exposure to risks or identification of modern slavery.

Wingate's Group Risk & Compliance Team provides a quarterly compliance report to the RCC and modern slavery has been added to the topics that will be reported upon. In preparing this quarterly report, the Group Risk & Compliance Team will review the operations of Wingate and discuss compliance issues with each business unit.

Modern slavery has been included in Wingate's Risk Register to ensure its formal monitoring and reporting, including the reporting of escalation of risks and of progress to mitigate identified risks. The RCC has the responsibility of assessing the effectiveness of all actions taken to address identified risks.

6. The process of consultation by Wingate

Representatives of the key business units and the corporate office of Wingate :

- a) were involved in the initial preparation and drafting of this Statement;
- b) are involved in the annual review and updating of this Statement; and
- c) have the opportunity to discuss and share ideas in relation to modern slavery.



7. Other relevant information

There is no other relevant information to provide.

This Statement was approved by the Board of Wingate Group Holdings Pty Ltd on 21 December 2022.

Eric Williamson
Chief Executive Officer
Wingate Group Holdings Pty Ltd