

## SEEK Growth Fund | Modern Slavery Statement

Financial Year ending 30 June 2023

This modern slavery statement is given by the SEEK Growth Fund (**Fund**).

SEEK Growth Sub-Trust (**Sub-Trust**) is a wholly owned subsidiary of the Fund.

### Structure and Operations

The Fund is a wholesale, unregistered managed investment scheme. The trustee of the Fund is SEEK Growth Nominees Pty Ltd (ACN 651 929 725) (**Trustee**).

The Fund has been established as a long-term investment vehicle, focusing on investments in high-growth Human Capital Management (**HCM**) businesses that are typically privately owned. The current focus in the HCM sector is across three themes: education, HR Software as a Service (**SaaS**) and contingent labour.

The Fund has a global mandate. It currently holds investments in the following jurisdictions: Australia, the United States, the United Kingdom, Brazil, Mexico and Singapore.

The Sub-Trust also holds investments in privately owned HCM businesses. The trustee of the Sub-Trust is SEEK Growth Nominees No.2 Pty Limited (ACN 653 364 320).

SEEK Growth Group Pty Limited is the investment manager of the Fund (**Investment Manager**). The Investment Manager supplies to the Fund personnel and business operations services. The Investment Manager has 26 employees and engages external providers to support business operations, including in connection with: legal services, tax services, payroll and financial accounting services, IT, fund administration and external audit.

### Risks of Modern Slavery Practices in operations and supply chains

The Fund's potential exposure to modern slavery risks arise principally from being an investor in portfolio companies and from its procurement of goods and services.

The Fund obtains services from external service providers. As explained further in the section below, the Fund's service providers are assessed individually, including having regard to risk factors based on geographic location, product and/or industry.

Primary service providers of the Fund include:

- investment managers;
- corporate authorised representatives and financial services licensees;
- fund administration service providers;
- external auditors; and
- legal and tax professionals.

In the Fund's view based on its assessments, its primary service providers have a relatively low risk of modern slavery. That view is based on the geographic location and reputation of those service providers and the characteristics of the products and services provided.

### Actions taken to assess and address risks, and evaluation of those actions

Consistent with the Fund's commitment to human rights, the Investment Manager has on behalf of the Fund and Sub-Trust implemented a range of policies designed to identify, assess and, where possible, mitigate risks of modern slavery and human trafficking within the Fund's operations and supply chain.

This includes the implementation of a:

- Code of Conduct (including Anti-Bribery and Anti-Corruption);
- Whistleblower Policy; and
- Risk Management Policy.

Further, the Investment Manager's internal processes and procedures designed to mitigate the risks of modern slavery and human trafficking include the following:

- monitoring and assessing the implementation and effectiveness of the above internal policies;
- engaging with reputable suppliers and conducting a thorough assessment and selection process;
- undertaking appropriate levels of due diligence and oversight of suppliers, having regard to relevant risk factors (including geographic location and the nature of the services obtained);
- conducting appropriate due diligence and negotiating relevant contractual obligations and protections relating to modern slavery when investing in portfolio companies;
- supporting nominee directors on the boards of portfolio companies to make relevant enquiries and assess modern slavery risks; and
- supporting an inclusive workplace.

The Investment Manager also provides relevant training to employees of the Fund on a regular basis.

The Fund's processes, procedures and means to measure effectiveness of modern slavery risk management will continue to evolve as the business matures.

#### Consultation with controlled entities

The board of the Sub-Trustee was consulted in the preparation of this statement.

#### Approval

This statement was approved by the Board of the Trustee.

Andrew Bassat, in his capacity as Chairman of the Board, is a responsible member of the Fund and is authorised to sign this statement.

#### Andrew Bassat



Chairman  
SEEK Growth Nominees Pty Limited

Dated: 22 December 2023