



Modern Slavery Policy

Owner	CIO
Approval	CIO
Relates to	ECP Asset Management Pty Ltd
Date Last Updated	30-06-2021
Primary Rules/Rationale	Outline commitments of active ownership and the incorporating of Modern Slavery Act requirements into ownership policies and practices. Modern slavery Act 2018; Department of Home Affairs Modern Slavery Guide.

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Policy

Introduction

Overview

The policy covers ECP Asset Management and its associated entities.

Background

Slavery and human trafficking are a growing global issue. Commonwealth Modern Slavery Act 2018 established Australia's national Modern Slavery Reporting Requirement (reporting requirement). The reporting requirement applies to commercial and not for profit entities with annual consolidated revenue of at least AU\$100 million.

ECP has voluntarily elected to adopt this modern slavery policy to support basic human rights.

The UK Modern Slavery Act (MSA) contained broad provisions that bound companies with an annual turnover of GBP 36million and with operations in the UK, to report annually on the steps they are taking to address slavery in their supply chains.

The term modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Modern slavery victims are often vulnerable to exploitation due to their background, migration status or structural factors like poverty. Both adults and children can be victims of modern slavery. Women and children are often especially vulnerable.

Modern slavery is a crime and a violation of fundamental human rights and includes the following:

- Any conduct constituting a modern slavery offence;
- Any conduct involving the use of any form of slavery, servitude or forced labour to exploit children or other persons taking place in the supply chains of the businesses.



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Application

Our Firm

ECP has a commitment to conduct its business and all its relationships based on integrity and ensuring the following:

- There is no modern slavery or human trafficking in any part of our business, investments and suppliers;
- Implementing and enforcing effective systems and control to ensure modern slavery and human trafficking is not present in any of our business relationships; and
- Taking appropriate steps to ensure all fundamental human rights are protected irrespective of their capacity and we maintain a safe and inclusive culture.

Our Investments

When assessing investments in our portfolios, companies that meet the reporting requirements must be able to demonstrate their compliance with the Modern Slavery Act.

Where the company is required under law to publish its Modern Slavery Policy or is a Reporting Entity we will interrogate the policy and look for evidence that it is implemented.

Where the company is not required under law to publish its Modern Slavery Policy, we will interrogate senior management to understand their approach to Modern Slavery and ensure it complies with our ethical requirements.

Steps Taken

- Our Risk Management System considers all risks including the possibility Modern Slavery;
- Our Investment Process is documented and Robust and includes the assessment of the risk of Modern Slavery;
- Our employees and investment staff complete modern slavery awareness training

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Modern Slavery Requirements

- Criterion 1 / 2 Identify the reporting entity and describe its structure, operations, and supply chains.

- Criterion 3 Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls.

- Criterion 4 Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.

- Criterion 5 Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.

- Criterion 6 Describe the process of consultation with any entities the reporting entity owns or controls.

- Criterion 7 Any other relevant information.

ECP Supply Chain

When engaging outsourced providers, we will seek to ensure they adopt appropriate modern slavery protocols and can provide reasonable assurance that they support the fundamental human rights.

In most instances our suppliers are Australian based entities. Where we identify a suitable offshore provider due diligence is applied prior to appointment and must meet our outsourcing policy.