

## Modern Slavery Statement 2020

This Modern Slavery Statement is made by Spheria Asset Management Pty Limited (ACN611 081 326) (Spheria) for the financial year 1 July 2019 to 30 June 2020 with regard to the matters contemplated in the *Modern Slavery Act 2018* (Cth) (**Act**).

Spheria is not a 'reporting entity' as defined under the Act..

This statement discloses the current activities of the business.

### Introduction

Spheria is an investment management boutique founded in 2016. The firm was established with a goal to align our people with our clients. Importantly, the firm is majority owned by our investment staff and the team is invested alongside our clients in the investment strategies.

Our staff is made up of professionally qualified and skilled employees and we consider the risk of modern slavery occurring within our business to be low.

### Our commitment

Spheria is committed to operating its business lawfully, in accordance with high levels of ethical and professional standards, and seeks to only work with suppliers that have similar values, ethics and sustainable business practices.

We do not condone and will not knowingly support or conduct business with any organisation involved in human slavery and slavery like practices, human trafficking or child labour.

### Ethical Standards

Spheria is dedicated to mitigating the risk of modern slavery in its business and supply chains and the assets in which it invests in.

We value and observe all laws regarding social responsibility, environmental, workplace safety, staff inclusion and diversity.

We assess and address modern slavery risks when making investment decisions. Our ESG policy commits us to making responsible investment decisions on behalf of our clients.

We have various policies in place that support our day-to-day operations to ensure all staff and suppliers meet Spheria's core values, including:

- Conflicts of Interest Policy
- ESG Policy
- Code of Conduct
- Outsourcing Policy

### Supply Chain

We believe that the sector (investment management) and location (Australia) in which we operate represent a relatively low risk of modern slavery and human trafficking.

Our suppliers are generally considered relatively low risk in terms of sector and location of operations.

Many of our suppliers are professional services firms, including banks, accountants and law firms. We also source services relating to office supplies, employment and training of staff, external legal advice, leasing of office space, IT, travel, catering and cleaning.

[In preparing for our first annual modern slavery statement, we have received confirmation from our key existing suppliers that neither they nor any company in their group has committed or been notified

or placed under investigation for any offences relating to modern slavery or human trafficking. We have further received confirmation that none of our key suppliers is aware of any circumstances within their supply chain that could give rise to an investigation or a prosecution for any offences relating to modern slavery or human trafficking.

We undertake due diligence prior to the appointment of any new supplier. We will ensure that each new supplier addresses the issue of modern slavery and human trafficking during our procurement process. We will also seek to ensure that relevant suppliers are obliged to inform us of any developments in respect of modern slavery or human trafficking either in their business or in their supply chain.

## **Future tasks**

To address modern slavery risks, Spheria undertakes to implement the following actions:

- Assess and address modern slavery risks when making investment decisions in relation to managed portfolios by explicitly including these considerations as part of your investment process and/or ESG guidelines;
- Issue questionnaires or requests for information regarding modern slavery practices to high and medium risk suppliers, based on supply chain mapping and characterisation as part of on-going procurement and supplier due diligence (including supplier audits);
- Request a commitment from supplier to assist in the identification and reduction in modern slavery in its supply chain
- Request reporting from suppliers;
- Request contracts with suppliers to include clauses relating to modern slavery, e.g. requirement on supplier to provide information in relation to labour practices / conduct audits, termination rights for breaches of Modern Slavery Act, indemnity for breaches of Modern Slavery Act
- Train staff involved in procurement regarding modern slavery and how to identify it.

Marcus Burns

Managing Director

Spheria Asset Management