

# Apostle Funds Management Modern Slavery Statement

*All employees of Apostle Funds Management Pty Limited are expected to act in accordance with this document.*

Date: March 2024

## **Introduction**

This modern slavery statement (the Statement) is made by Apostle Funds Management Pty Limited (ACN 129 922 612) for the financial year ended 30 June 2023. It covers the following entities:

### **Apostle and its related entities:**

Apostle Funds Management Pty Limited  
AD Carbon Pty Limited

### **Investment funds managed by Apostle and its related entities:**

Apostle People and Planet Diversified Fund  
Apostle Dundas Global Equity Fund  
Apostle Ethical Global Credit Fund  
Apostle Carbon Credit Fund

This statement has been prepared to comply with section 14 of the Modern Slavery Act 2018 (Cth) (the **Act**) and covers the 12 month financial period ended 30 June 2023.

Apostle Funds Management Pty Ltd ('Apostle') is committed to continually improving our systems and processes to combat slavery and human trafficking. Apostle understands the risks of modern slavery to mean the potential for our business to cause, contribute to, or be linked to modern slavery through our operations and supply chains. We recognise that particular types of suppliers (e.g. those employing lower-wage staff) may represent a higher risk of modern slavery and human trafficking. We also understand that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude and workplace abuse. Therefore, in this statement, we will use the terms "slavery and human trafficking" to encompass these various forms of coerced labour.

Apostle's exposure to the risks of slavery and human trafficking emanates from two primary sources: our investment activities as shareholders of companies and our procurement of goods and services (and their associated supply chains). This statement covers both of these sources of modern slavery risk.

## **Organisational Structure**

Apostle operates as an Australian domiciled, privately held, investment management business. We partner with investment managers across Australia, North America, and Europe to invest responsibly over the longer term for the benefit of our clients.

## **Our Business**

Apostle is an investment management business with expertise across a range of asset classes and specialist investment sectors. Our approach to investment is driven by a commitment to provide the best possible outcomes over the long term for our investors. Our underlying investment philosophy is to provide quality investment products to clients that deliver investment outperformance over the long term and through market cycles. We have a range of investment styles which vary across our investment team and partners. Each of our investment teams and partners has the ability to make autonomous investment decisions. While the investment teams and partners work independently of each other, all decisions are underpinned by a common commitment to the principles of Ethical and Responsible Investment.

## Our Policies on Slavery

Our philosophy, purpose and values are integral to the way we operate our business. Our commitment to human rights is supported by our ongoing development and implementation of policies that identify, assess and mitigate risks of modern slavery and human trafficking. These include, but are not limited to our:

- Breach and Complaint Management
- Privacy Policy
- Risk Management Policy
- Modern Slavery Policy
- Code of Conduct
- Anti-Money Laundering & Counter Terrorism Financing Program
- Market Conduct
- Conduct & Disclosure Policy
- Whistleblower Protection Policy
- Ethical and Impact Investment Policy; and
- Soft Dollar Policy.

Our relevant internal processes and procedures designed to mitigate the risks of modern slavery and human trafficking include, but are not limited to the following:

- we monitor and review the effectiveness of relevant internal policies and how these have been implemented across our business;
- we undertake proportional supplier oversight and due diligence on proposed and existing key first tier suppliers; and
- we implement practices to support an inclusive workplace.

## Training

Staff receive training on team culture. Investment teams and committees have ethical investment guidelines designed to assist in identifying and mitigating human rights risks. Staff receive training on group culture and investment teams have embedded processes designed to help minimise underlying human rights risks in investment portfolios.

## Approach of our Investment Teams to Modern Slavery Risks

We recognise that, as allocators of capital, stewards of our clients' assets and as active shareholders in companies on their behalf, the individual and collective decisions we make as investors have far-reaching implications. The opportunity to influence positive change for the millions of victims of modern slavery whilst securing sustainable long term investment returns is central to our stewardship responsibilities. As an organisation, Apostle has been assessing and managing human rights risks within our portfolios for a number of years. We have worked with a number of market leaders to continue to develop and refine our approach to better identify companies in our portfolios that are exposed to modern slavery risks within their operations and supply chains and to address these risks. Using our Ethical and Impact Investment Policy as a basis, we have conducted a mapping of where the key modern slavery risks lie within our investment portfolios using analysis from a range of external data providers, working groups and the individual investment managers. Apostle screens and qualitatively assesses investments periodically and may choose to exclude companies that do not comply with our corporate governance standards and have verified, human rights violations – disrespectful and unequal treatment of citizens, including modern slavery, human trafficking, and child labour.

At a very high level, the key risks identified by our investments include companies in the following industries: consumer discretionary (in particular retailers, apparel and technology), health care supplies, energy and construction; and emerging markets that are marked by conflict, have repressive regimes in place and rely heavily on migrant labour. There is greater risk where companies are based in emerging markets or importing goods from such markets so we have prioritised action in this area (particularly in Asia). However, we recognise that the prevalence of modern slavery in developed markets is higher than previously recognised, so addressing these risks also forms part of our response.

## **Addressing Modern Slavery in our Supply Chains**

Our principal third party suppliers are professional services firms providing services to allow us to provide pooled and segregated investment management services to our clients. We also engage with businesses that supply services related to the running of our operations, premises (e.g. cleaning and catering services), IT systems and other support services and suppliers.

Apostle undertakes due diligence prior to onboarding new suppliers. We partner with highly reputable suppliers that align with the Ethical values of our business. This statement will be provided to all existing suppliers, it's adoption being central to all future supplier agreements.


Apostle expects that its suppliers will:

- comply with international human rights laws and norms set out in the International Bill of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work;
- manage their operations and their own supply chain guided by applicable regulations;
- ensure compliance with relevant laws affecting forced or involuntary labour, child labour, discrimination and security practices;
- ensure that products, services or facilities are not used for human trafficking and/or labour or sexual exploitation;

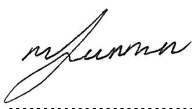
not use forced, bonded, or involuntary labour so that, for example, workers are free to leave after their shift ends or to resign their employment after giving reasonable notice. Apostle makes it clear that we expect compliance with all applicable Modern Slavery legislation.

## **This Statement**

This statement was approved by the Board of Directors of Apostle Funds Management Pty Limited on 31 March 2024.



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Karyn West (Mar 22, 2024 13:22 GMT+11)  
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Karyn West  
Managing Director



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Mitchell Gunman  
Director