



## MODERN SLAVERY STATEMENT

### 1. Introduction

#### Commonwealth Modern Slavery Act 2018

#### Anti-Slavery and Human Trafficking Statement

At Euroz Hartleys Group Limited ('Euroz Hartleys'), respecting human rights is inherent in our business operations and is embedded in our values, reflecting and shaping our behaviours and organisational culture. We aim to treat everyone fairly and create a workplace and operating environment that is safe, ethical and transparent. Aligning with our core values and beliefs, any action taken to date or planned in the future will enhance our ability to address the risk of modern slavery in our operations and supply chain. This statement has been prepared in accordance with the Australian Modern Slavery Act 2018 which came into effect on 1 January 2019.

We are required to prepare and lodge an annual Modern Slavery Statement with the Minister of Home Affairs within 6 months of the end of the financial year that is:

- Compliant with the mandatory content requirements;
- Prepared in the correct form for the Minister to approve;
- Approved by the board of Euroz Hartleys;
- Signed by the Executive Chairman of Euroz Hartleys.

### 2. Company Overview

Euroz Hartleys is a Western Australian based provider of full-service stockbroking, investment, financial advisory, corporate finance, wealth management and funds management services to private, institutional and corporate clients.

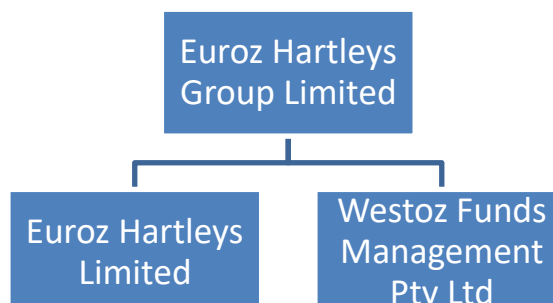
Originally founded and listed in 2000 as a stockbroking business, through organic growth and successful acquisitions we have grown to become one of the largest Western Australian financial advisory firms. The Group has over 180 employees in our offices in Perth and has a national and international client base and large distribution network (as at 30 June 2023).

Across our main operating entities Euroz Hartleys Limited and Westoz Funds Management Pty Ltd we service over 24,000 clients with funds under management of \$3 billion. Our specialist focus is on ASX listed resource, energy and industrial companies with a market capitalisation of between \$5 million and \$5 billion. Our business is led by an experienced, stable Board and management team which has a substantial stake in the Group, 45% of Euroz Hartleys is owned by employees.

This Modern Slavery Statement sets out the risks of modern slavery in our operations and supply chains and provides information about the actions taken by Euroz Hartleys to address those risks.



## Company Structure



## Company Purpose and Values

Euroz Hartleys purpose is to create long term shareholder value by consistently delivering exceptional outcomes for our clients.

Our values drive us, they are the standards we expect from our team which we hold people accountable to, they are:

- **Relationships**

Strong relationships built on a foundation of trust

- **High Performance**

Achieving superior client outcomes by pushing our capabilities

- **Integrity**

Acting with integrity and honesty

- **Accountability**

Taking responsibility and delivering on our commitments

- **Respect**

Embracing teamwork, diversity, humility and openness

## 3. Our Supply Chains

In the operation of our business, Euroz Hartleys engages or employs a number of vendors and suppliers for the provision of good and services, including the provision of market execution services, and the provision of various systems and application to facilitate the day to day business operations. The critical service providers are regularly reviewed as part of the business continuity and disaster recovery planning.

Euroz Hartleys and our subsidiaries supply chain includes, but is not limited to;

- IT hardware and software;



- Building facilities and office supplies;
- Payroll services;
- Legal, accountancy and other professional intermediaries;
- Financial market data and news;
- Transaction related services and infrastructure.

The primary risk of modern slavery practices in our supply chains are that employees of vendors/suppliers are subject to forced labour, servitude or debt bondage (e.g. where a person is coerced to work through the use of violence, intimidation or accumulated debt), human trafficking or forms of child labour. In addition to critical service providers, Euroz Hartleys also employs or engages other vendors and suppliers for the provision of specific services including post and courier, catering and other general office administration.

#### 4. Modern Slavery Risks in our Operations and Supply Chains

As a financial services business operating in a highly regulated industry with a professional workforce, Euroz Hartleys and our subsidiaries considers the risk of Modern Slavery within our direct business operations to be low. However, we do recognise that throughout supply chains and investment arrangements, it can be indirectly connected to modern slavery risk.

Euroz Hartleys has undertaken a review of our supply chain to help us identify and prioritise the areas of our business which we believe are at the highest risk of impacting our operations and supply chains due to modern slavery and human rights risk.

- **IT hardware and software**

We purchase computer hardware and software such as desktop computers, notebooks and tablets, laptops and other items from IT distributors who ultimately purchase these from offshore manufacturers. It is reasonable to assume that some of these manufacturers use trafficked persons, slavery, servitude, forced labour, deceptive recruiting practices or child labour in the production of these devices.

- **Building facilities and office supplies**

It is reasonable to assume that ongoing cleaning services performed in our offices represents a high inherent risk of modern slavery. Our supply chain of the food and beverages served in our offices may be considered high risk due to the nature of the work necessary in the production, processing, packing and transportation of the individual items used for this purpose.

- **Payroll services and employee entitlements**

Euroz Hartleys follows federal and state specific employment laws (including the Fair Work Act 2009 and the ASIC Reference Checking and Information Sharing Protocol) when hiring employees. The internal policies in place provide for background and identity checks for current and prospective employees (including rights to work checks). All payroll duties, entitlements and leave access is provided to all employees within the company, in line with all legal obligations.



- **Legal, accountancy and other professional intermediaries**

Within the usual course of business, it is common for Euroz Hartleys to engage with external professionals for the purposes of additional services which are not able to be met within the company. Given that additional professional service providers will have been required to meet their ongoing professional requirements, Euroz Hartleys considers this supply chain to be low risk.

- **Financial market data and news**

The provision of this service is primarily based off factual information. Therefore it is appropriate to determine this area of our supply chain to be low risk.

- **Transaction related services and infrastructure**

From time to time Euroz Hartleys may engage with external service providers for the provision of specific and isolated services. Where this occurs, consideration will be given to the actual services required, and their potential for modern slavery risk. For example, if Euroz Hartleys is to arrange for flowers to be sent to a sick employee, this may, inadvertently see Euroz Hartleys engage with a florist who has purchased flowers from a reputable source, however these flowers may have been planted/picked by individuals who are experiencing one or more **aspects** of modern slavery. We consider that it is reasonable to determine the modern slavery risk in these circumstances to be medium, however being able to state low or high categorically, is subjective to the services required.

## 5. Due Diligence and Remediation in our Operations and Supply Chains

Euroz Hartleys aims to build ongoing supportive, transparent and collaborative relationships with our suppliers. It is anticipated that our suppliers will take appropriate steps to ensure that their organisation does not engage in, or inadvertently condone modern slavery, including that their employees and contractors work in decent and safe conditions, and that no human trafficking, forced labour, child labour or other forms of modern slavery is employed in the delivery of products or services to Euroz Hartleys.

Euroz Hartleys has taken the following steps to address modern slavery risks within our supply chains:

- Review current suppliers and request their modern slavery statement (if appropriate) to benchmark against the business risk attitude.
- Where the supplier's modern slavery statement is in line with Euroz Hartleys goals, retain that supplier as a preferred supplier
- Where the supplier does not align with Euroz Hartleys goals, consider services provided, and determine if another supplier, who does align with the Euroz Hartleys goals, can be engaged.
- In new contractual arrangements, consider references (or lack of) to Modern Slavery risk management and determine if the new supplier's position on this aligns with Euroz Hartleys.
- Distribute and publish this policy to all employees, with additional support and information being available to all employees should they identify this is required.



## 6. Our Policies and Principals

We are committed to conducting business ethically and to ensuring that there is no slavery or human trafficking in our business or in our supply chains.

Employees are provided with training as part of the induction process to ensure they have a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chains. Refresher training is provided as appropriate. We expect our suppliers to meet the same high standards.

We have in place a number of company and Group policies which address issues relevant to slavery and human trafficking, including:

- Codes of Conduct.
- Anti-bribery and Anti-corruption Policy.
- Anti-Money Laundering and Counter-Terrorism Financing Program and Policy.
- Diversity Policy.
- Equal opportunity and Anti-Discrimination and Harassment Policy.
- Written employment practices and procedures which ensure fair recruitment and treatment of employees, including Flexible Working Arrangements Policy and Reference Checking and Information Sharing Policy.
- A written whistleblower policy and procedure which enables employees to report in confidence and concerns of malpractice or other unethical behaviour, which include any concern related to slavery and human trafficking issues.

As part of our ongoing engagement with vendors and suppliers, Euroz Hartleys has undertaken to identify from each service provider, a statement or agreement from them with respect to how they identify and manage their Modern Slavery obligations.

Once we have a full understanding, the information will be used to identify vendors and supplies which will be our preferred service provider, Euroz Hartleys will continue to review these arrangements on an ongoing basis. For engagement with new vendors or suppliers, Euroz Hartleys will review and complete due diligence on each contract content prior to engagement. For regular suppliers, we will commit to undertake a review considering the product/service provided, the frequency with which we use the product and service, any public statements relating to modern slavery published by or on behalf of the entity and the likelihood of modern slavery being present in the relevant supply chain.

Whilst some areas of our engagement with external service providers may be allocated a risk level of high with regard to the MSA, Euroz Hartleys, having collectively considered the overall inherent and residual risk of modern slavery in its operations and supply chains and on the basis of the structure, nature and scale of the business operations, has assessed the ongoing Modern Slavery risk of the business to be low.

Should it occur that Euroz Hartleys becomes aware of any supplier who is non-compliant with applicable obligations, this matter will be reported to the Board of Directors or consideration and determination of next steps, which may include termination of all services.



## 7. Our Continuing Commitment

We will continue to monitor and review our existing policies during the current financial year, along with our current and any new engagement within our supply chain, with the aim of ensuring that slavery and human trafficking does not occur in any part of our business or our supply chains.

Our Modern Slavery Statement is available to all employees, regardless of employment status (full time/part time/on extended leave etc). Euroz Hartley has a Compliance and Risk management committee which reviews our obligations and ensures that any material changes which may impact our business are communicated to the board and then all employees.

Euroz Hartleys maintains a Compliance and Risk Management Committee of senior employees and chaired by the Head of Risk. This committee meets under charter regularly to review the risk framework, compliance testing results and audit outcomes.

Our entire business operations are based in Perth, Western Australia and we do not outsource any of our business operations. All of our business partners are domestically located in Australia.

## 8. Looking forward

It is acknowledged that modern slavery can be an invisible risk with its presence either not fully understood by all stakeholders or it occurs at arm's length in our business transactions.

We have implemented various policies and procedures to create a strong framework across Euroz Hartleys to communicate our intent, expectations and assist us in managing our modern slavery risks. The framework will continue to evolve to capture our progression and developing maturity.

Euroz Hartleys will continue to proactively engage with our suppliers and business partners, collaborating with our industry peers, and actively investigating areas of concern. New supplier contracts will be reviewed to identify alignment with modern slavery laws.

Ongoing governance and oversight will be part of the Board of Euroz Hartleys obligations, as they guide and direct the company towards the appropriate management of the modern slavery risks of the company.

Euroz Hartleys will ensure training within our business, ensuring our policies and procedures are available to all employees.

Euroz Hartleys is aware of obligations to identify areas and ways we can improve our performance in this area. Where improvements are identified, implementation will be actioned in a reasonable timeframe, rather than awaiting annual review.



## 9. Approved by the Board

This statement was approved by the board of Euroz Hartleys Group Limited in their capacity as principal governing body of Euroz Hartleys Group Limited on 30 June 2023.

This statement is made pursuant to section 16 (2)(a) of the Modern Slavery Act 2018 and constitutes Euroz Hartleys Group Limited's slavery and human trafficking statement for the financial year ended 30 June 2023.

Andrew McKenzie

Executive Chairman

30 June 2023