

## MODERN SLAVERY POLICY

Version 2 – June 2024

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### 1. Purpose

- 1.1 Our Modern Slavery Policy (this “**Policy**”) has been put in place to address potential modern slavery risks in our corporate supply chains and investment portfolios.
- 1.2 PIML’s Responsible Investment Policy further explains how we seek to address modern slavery risks in our investment portfolios and how we incorporate Environmental, Social and Corporate Governance (“**ESG**”) considerations (including modern slavery) into our investment process.
- 1.3 This Policy is further supported by the following policies and procedures aimed at preventing unlawful or improper conduct:
- (a) Human Rights Policy;
  - (b) Diversity and Inclusion Policy;
  - (c) Business Rules of Conduct & Personal Investing Rules;
  - (d) Directors’ Code of Conduct;
  - (e) Whistleblower Protections Policy; and
  - (f) Anti-Bribery and Corruption Policy.

Please refer to these policies for further details.

### 2. Which entities does this Policy cover and who does it apply to?

- 2.1 This Policy covers the following entities:
- (a) Platinum Asset Management Limited;
  - (b) Platinum Investment Management Limited (“**PIML**”);
  - (c) Platinum Asia Investments Limited;
  - (d) Platinum Capital Limited;
  - (e) Platinum Asset Pty Ltd,
- “**Platinum**”, “**we**”, “**us**” or “**our**”.
- 2.2 This Policy applies to all persons working for us or on our behalf in any capacity, including our directors, officers, employees, seconded workers, volunteers, interns and contractors (“**Employees**”, “**you**” or “**your**”).

- 2.3 We expect you to comply with this Policy.
- 2.4 This Policy does not form part of any Platinum employee's contract of employment and we may amend it at any time by providing notice to you.

### **3. What is Modern Slavery and how do we address it?**

- 3.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, whether adults or children, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 3.2 We are committed to acting ethically and with integrity in our business dealings and relationships and to implementing and enforcing systems and controls designed to identify and address modern slavery risks arising in our corporate supply chains and within the investment portfolios we manage.
- 3.3 We are committed to ensuring there is transparency in our approach to tackling modern slavery throughout our corporate supply chains and investment portfolios, consistent with our obligations under the *Modern Slavery Act 2018* (Cth). We assess our suppliers for modern slavery risks and as part of our procurement process, to the extent reasonably practicable, seek to include in our supplier contracts, specific contractual obligations regarding our supplier's compliance with applicable modern slavery laws. We expect that our suppliers will hold their suppliers to equivalent standards.
- 3.4 Modern slavery risks in our investment portfolios are assessed by PIML's investment team as part of our broader approach to ESG within the investment process. Please refer to PIML's Responsible Investment Policy for further details.

### **4. Responsibility for the Policy**

- 4.1 The board of directors of each Platinum entity has overall responsibility for this Policy and ensuring that the relevant Platinum entity complies with it.
- 4.2 The board of directors of each Platinum entity is also responsible for approving our annual Australian modern slavery statement. The *Modern Slavery Act 2018* (Cth) established Australia's national modern slavery reporting requirements and requires businesses that meet certain annual turnover thresholds to annually prepare and submit a modern slavery statement setting out, among other things, the business' actions and responses to modern slavery and encourages businesses to increase transparency in their supply chains. Those statements are then provided to the Australian Government through the Attorney-General's Department for publication on a central online website.

- 4.3 PIML's Head of Stewardship is the business owner of this Policy. The Head of Stewardship's responsibilities extend to:
- (a) defining our modern slavery framework;
  - (b) co-ordinating the preparation of our annual Modern Slavery Statement in accordance with our disclosure obligations under the *Modern Slavery Act 2018* (Cth); and
  - (c) dealing with any queries (internal and external) about this Policy and our Responsible Investment Policy.
- 4.4 PIML's business managers are responsible for:
- (a) implementing our modern slavery framework within the context of our corporate supply chains;
  - (b) monitoring and consulting with our suppliers to identify and mitigate risks of modern slavery practices in our corporate supply chains; and
  - (c) escalating any identified issues to the Head of Stewardship for assessment.
- 4.5 PIML's investment team is responsible for:
- (a) implementing our modern slavery framework within the context of the investment portfolios we manage; and
  - (b) monitoring and engaging with our investee companies to identify and seek to mitigate risks of modern slavery practices in the investment portfolios we manage.
- 4.6 PIML's Chief Compliance Officer ("CCO") has responsibility for monitoring the effectiveness of our modern slavery framework. The CCO's responsibilities extend to:
- (a) testing the procedures and controls that have been put in place to identify and mitigate the risks of modern slavery practices in our corporate supply chains and investment portfolios; and
  - (b) monitoring the effectiveness of those measures.

## **5. Compliance with the Policy**

- 5.1 You must ensure that you read, understand and comply with this Policy.
- 5.2 The prevention, detection and reporting of modern slavery in any part of our business or corporate supply chains is your responsibility. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 5.3 You must notify the CCO as soon as possible if you believe or suspect that a breach of this Policy has occurred, or may occur in the future. Alternatively, if you have reasonable grounds to suspect

that a breach of this Policy also constitutes misconduct or an improper state of affairs or circumstances, in relation to Platinum, or an officer or employee of Platinum, you may report it in accordance with our Whistleblower Protections Policy. Please refer to our Whistleblower Protections Policy for examples of what constitutes such misconduct or an improper state of affairs or circumstances.

- 5.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our corporate supply chains or business at the earliest possible stage. Such concerns should be raised with the Head of Stewardship in the first instance.
- 5.5 If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions, constitutes modern slavery, please raise it with the Head of Stewardship or General Counsel.

## **6. Communication and awareness of this Policy**

- 6.1 We will provide regular training to all our employees on this Policy. This will include training on how to identify modern slavery practices and the particular parts of our business and corporate supply chains which are subject to a greater risk of modern slavery practices.

## **7. Breaches of this Policy**

- 7.1 An employee who breaches this Policy may face disciplinary action, which could result in dismissal.
- 7.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy.

## **8. Further information and review of this Policy**

- 8.1 This Policy will be made available to all Platinum staff on Platinum's intranet and will also be available on Platinum's website.
- 8.2 If you require further information about this Policy please contact Platinum's Head of Stewardship.
- 8.3 This Policy will be reviewed every two years or sooner if there are changes to laws or regulations which necessitate an earlier review.