



# MODERN SLAVERY POLICY



# MODERN SLAVERY POLICY

## 1. INTRODUCTION

Duxton Capital (Australia) (ABN 87 164 225 647) ("**Duxton**", "**us**", "**our**", "**we**") is an asset management firm that specialises in agriculture, hospitality, and listed equity investments for institutional, semi-institutional and high net-worth investors.

The Duxton Group invests heavily in the agriculture and hospitality sectors, which are particularly exposed to risks of modern slavery. Duxton acknowledges that there are increased risks of exploitation in these sectors and we are committed to taking the necessary steps to mitigate the risks of modern slavery from occurring within our organisation and its supply chains.

## 2. PURPOSE

Pursuant to the requirements of the *Modern Slavery Act 2018* (Cth) ("**Act**"), Duxton is/or may be required to make annual public reports known as "modern slavery statements". Duxton is committed to being transparent on the actions that it has taken, and will continue to take, to address modern slavery risks in its operations and supply chains.

Duxton recognises that modern slavery risks may arise indirectly through its operations or supply chains. In order to take effective action against modern slavery, Duxton is committed to developing internal policies and procedures that support these actions.

The purpose of this Modern Slavery Policy ("**Policy**") is to set out procedures to:

- 2.1 prevent, mitigate and where appropriate, remedy modern slavery in our operations and supply chains;
- 2.2 encourage employees to raise any concerns and report instances of modern slavery or suspected modern slavery;
- 2.3 source products and services in accordance with legal obligations and community expectations while working with suppliers; and
- 2.4 help to ensure that Duxton maintains high standards of ethical behaviour and integrity.

## 3. SCOPE

This Policy applies to all employees, directors, officers, agency workers, contractors, consultants or any other third-party representative of Duxton or any related body corporates within the meaning of the *Corporations Act 2001* (Cth).

This Policy must be read in conjunction with the Duxton Supplier Code of Conduct and Whistleblower Policy.

#### 4. WHAT IS MODERN SLAVERY?

Modern slavery is defined as the severe exploitation of other people for personal or commercial gain. Modern slavery describes situations of coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery include:

- 4.1 slavery;
- 4.2 slave trading;
- 4.3 forced labour;
- 4.4 forced marriage;
- 4.5 debt bondage;
- 4.6 human trafficking; and
- 4.7 child labour.

#### 5. DUXTON'S ACTIONS AGAINST MODERN SLAVERY

The following procedures are to be implemented to assess and address Duxton modern slavery risks:

##### 5.1 Employee training

To ensure employees are able to identify and report modern slavery or suspected modern slavery, Duxton will establish and maintain an employee training program regarding modern slavery. The training will address:

- 5.1.1 how to identify modern slavery;
- 5.1.2 the process for reporting identified or suspected modern slavery; and
- 5.1.3 the requirement for employees to conduct due diligence on suppliers.

Training will initially be delivered to management and key employees involved in the procurement of suppliers in a method at the discretion of Duxton (i.e., face-to-face training, online training modules or a handout form).

##### 5.2 Reporting

Duxton encourages all employees and external stakeholders to report any genuine concerns about modern slavery relating to Duxton's people, business, suppliers or supply chain. Duxton will not punish a worker by dismissal or discrimination for raising concerns or issues. All reports of modern slavery or suspected modern slavery will be taken seriously and investigated. Duxton may engage a third party to assist with such investigation, if it is considered necessary or desirable.

Reports, notifications, questions or concerns in relation to modern slavery should be made in writing to:

Head of Legal, Governance & Reporting  
Duxton House, 7 Pomona Road  
Stirling SA 5152

### 5.3 Modern Slavery Risk Management

Duxton acknowledges the potential for modern slavery to occur within its supply chains. As such, the risk of modern slavery have been incorporated within Duxton's Risk Management Framework.

Seeking to prevent, mitigate and otherwise address the risks of modern slavery, Duxton will perform due diligence on its suppliers, seeking to identify and mitigate the risks of modern slavery in its operations in accordance with this item 5.3.

#### 5.3.1 Supplier Due Diligence

Prior to engaging a new supplier, personnel who are authorised to engage third parties will conduct sufficient due diligence to ensure that the individual or organisation is reputable, competent and will comply with applicable laws concerning modern slavery.

#### 5.3.2 Extent of Due Diligence

The extent of due diligence for each supplier concerning modern slavery risks will be commensurate to the associated risk. The associated risk will consider the operating context, services involved or any other relevant considerations that may be linked to the presence of modern slavery risks.

Examples of due diligence activities which may be conducted include but are not limited to:

- Negative media screening of suppliers through external databases (e.g., Refinitiv World Check One)
- Providing existing and potential suppliers, copies of Duxton's Supplier Code of Conduct
- Including within contracts appropriate modern slavery provisions, including acknowledgements that suppliers have read, understand and agree to comply with Duxton's Supplier Code of Conduct
- Collecting data from publicly available resources, internal company reports or modern slavery experts
- Engaging with directly affected stakeholders

#### 5.3.3 Remediation

In the event that Duxton identifies modern slavery within its supply chain, in most cases, Duxton will seek to work collaboratively with its Suppliers, and work together to remedy the conduct.

Other actions that Duxton may take in the event it identifies modern slavery within its supply chain may include:

- 5.3.3.1 undertake further due diligence to assess the conduct;
- 5.3.3.2 provide a specific duration for the supplier to remedy the conduct; or
- 5.3.3.3 give notice to the supplier of the contract's termination.

### 5.4 Supplier Code of Conduct

All suppliers are expected to operate in accordance with the Duxton Supplier Code of Conduct ("**Supplier Code of Conduct**").

The Supplier Code of Conduct sets out the minimum standards of behaviour expected of business partners, stakeholders and people. The Supplier Code of Conduct expressly states Duxton's commitment to upholding human rights and the rejection of any form of modern slavery.

## 6. MODERN SLAVERY STATEMENT

Duxton will publish an annual modern slavery statement if required to do so under the Act. Any such modern slavery statement, amongst other matters, will address the criteria set out in the Act and identify the actions taken by Duxton to assess and mitigate the modern slavery risks within Duxton's operations and supply chains.

The modern slavery statement will also outline Duxton's plans for future improvements to its mechanisms and procedures in place to prevent, mitigate and where appropriate, remedy instances of modern slavery within its operations and supply chains.

## 7. POLICY AVAILABILITY, REVIEW AND AMENDMENTS

### 7.1 Availability of this Policy

A copy of this Policy will be available to staff and is also made available to current and prospective suppliers.

### 7.2 Policy review

The Board will review this Policy annually or as required.

### 7.3 Amendment of policy

This Policy can only be amended with the approval of the Board. Duxton will communicate any Policy amendments to any relevant individuals captured within the scope of this Policy.



---

DUXTON  
CAPITAL AUSTRALIA