2024 Modern Slavery Statement



AORIS

Contents

1. Introduction and purpose of this statement	03
2. About Aoris	04
3. Aoris' position on modern slavery	04
4. Our supply chain	06
5. Our portfolio holdings	06
6. Actions taken by Aoris to address modern slavery risks	07
7. Monitoring the effectiveness of our actions	30
8. Other relevant information	08
9. Looking forward	1(

Section

2

Aoris Investment Management (ABN 11 621 586 552) (Aoris) presents its 2024 Modern Slavery Statement. Aoris is not required to lodge such a statement under the Modern Slavery Act 2018 (Cth) (the Act) but has chosen to do so voluntarily as part of our commitment to a responsible approach to both our business operations and our investing.

This statement outlines the steps that Aoris has taken on behalf of our clients to detect and prevent modern slavery within our business, supply chain, and the companies we invest in.

We look forward to continuing to work with our suppliers, the companies in which we invest, and our investors, to help raise awareness of modern slavery, and influence others to assess and manage the risk of harm arising as a result of their business activities.

This statement is made by Aoris with respect to the year ended 30 June 2024. It will be updated and submitted annually.

This Modern Slavery Statement was approved by the Board of Aoris on 30 November 2024.

This statement outlines the steps that Aoris has taken on behalf of our clients to detect and prevent modern slavery within our business, supply chain, and the companies we invest in.



About Aoris

Section

2

Aoris is a specialist international equity investment manager. We manage a single international equity strategy that is available to investors through several vehicles, including the Aoris International Fund. Our investment objective is to deliver a return of 8–12% p.a. after fees over a 5–7-year period.

Aoris was founded in 2017 and is 100% staff owned.

Aoris' position on modern slavery

Section

3

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery include:

Human trafficking
Slavery
Servitude
Forced labour
Debt bondage
Forced marriage
Child labour

About Aoris continued



Aoris believes that organisations have a responsibility to consider their role in ensuring the respect of human rights and the avoidance of human rights abuses.

We take a wide view of human rights and recognise that exploitative labour conditions may not be captured in the narrow legal definition of modern slavery.

Aoris recognises that every business has the potential to inadvertently cause, contribute to, or be directly linked to modern slavery through its operations and supply chains.

Aoris acknowledges that modern slavery risks may be present in

- the supply chain of service providers used by Aoris to manage its operations and funds, and
- the underlying companies that Aoris has invested in and their extended supply chains.

Through ongoing engagement on the issue of modern slavery within our suppliers and our portfolio companies, we look forward to making a positive contribution towards the reduction of human rights abuses.

Supply chain

Our portfolio holdings

Section

4

Section

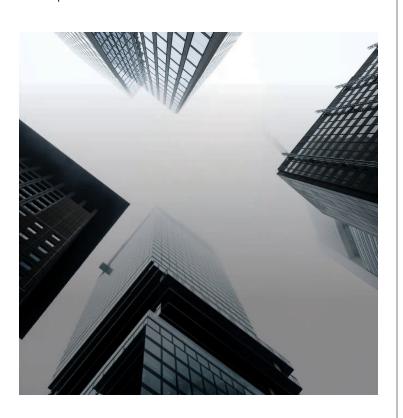
Aoris' suppliers comprise two groups of professional service firms: those who support the operations of our investment funds, and those who directly support our business. The former includes a responsible entity, custodian, fund administrator, unit registrar, and a broker. Service providers to our business include banks, finance and accountancy practices, outsourced information technology support, auditors and law firms.

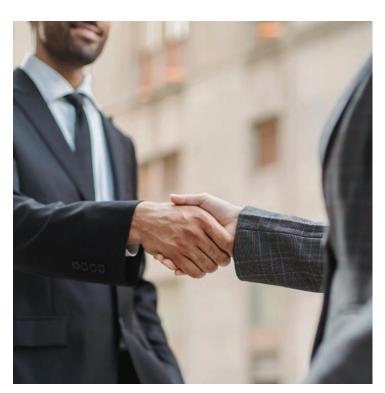
The risks of modern slavery in our operations and supply chain relate not only to people, but also to the integrity and quality of the services we receive and potential financial impact of operational disruption.

Our FY24 assessment did not identify any high-risk service providers. All services providers are categorised as low-risk, and are all professional organisations who operate in Australia.

Our Responsible Investing Policy clearly states that Aoris will not invest in businesses that engage in modern slavery as defined by the Act. Where modern slavery practices do exist in our portfolio companies but we have not identified them, the risks to the investee companies, and in turn our clients, include regulatory penalties, brand and reputational damage, and valuation impairment.

The Fund ensures accountability for modern slavery within our investment process by implementing negative screens based on activity and behaviour. Assessing companies specifically for poor labour practices, safe working environments, equal opportunities, and wages. We also use our right as shareholders to engage and vote on changes that relate to modern slavery.





5



Actions taken by Aoris to address modern slavery risks

Section

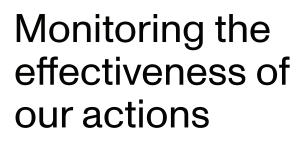
At Aoris we are committed to better understanding, identifying, managing, and mitigating the risks of modern slavery in our operations and those of our portfolio holding. Aoris does not have any subsidiaries or reporting entities.

During the June 2024 year, Aoris requested its service providers to complete a modern slavery self-assessment questionnaire. This questionnaire covers topics of mandatory reporting, operations, policies and responsibilities, due diligence processes, training and improvement, and supplier and subcontractor management. We sought confirmation they have not committed, or been notified of, or placed under investigation for, any offences relating to modern slavery. Suppliers were required to confirm that are continuously taking steps to identify risks and prevent the occurrence of modern slavery offences within their businesses.

Prior to the appointment of any new supplier, Aoris will undertake due diligence to ensure that each new supplier addresses the issue of modern slavery in its operations and supply chains.

For the purpose of evaluating and monitoring modern slavery risk among its investee companies, Aoris receives research from Social Advisory Services (SAS). SAS provides what we consider to be an objective and thorough assessment of labour practices and human rights controversies. Through our engagement and proxy voting, we encourage our investee companies to improve their supplier audits and report on labour practices among their suppliers and in their own operations transparently and comprehensively.





Section

The idea of risk assessment is not just to identify suppliers and portfolio companies where there is evidence of modern slavery, but also where evidence may not be apparent.

Aoris will assess the effectiveness of its actions to address modern slavery in its own operations and supply chain through the responses provided in the supplier questionnaires in the next reporting period. We will also conduct a periodic review of the modern slavery section of our risk register, which is carried out by Aoris' Risk and Compliance Committee.

For our portfolio holdings, we will look for an improvement in the completeness of their reporting on labour practices where we believe greater transparency is required.

In 2024, Aoris did business with 13 suppliers. We sent questionnaires and collected responses from all 13 of these providers. Only one supplier provided us with responses we deemed inadequate, and we will engage with them annually through a questionnaire to monitor their progress. For the remainder of our suppliers, we aim to collect responses every three years.



Other relevant information

Section

8

Aoris is a signatory to the United Nations Principles for Responsible Investment and reports annually in accordance with its reporting framework.

Aoris is also a member and maintains certification with the Responsible Investment Association Australasia (RIAA).



Looking forward

Section

9

We are proud to have submitted our second Modern Slavery Statement for the period to June 2024. We look forward to reporting on further progress in identifying, managing and mitigating the risks of modern slavery in Aoris' operations and supply chain, and those of our portfolio holdings.

Stephen Arnold

Managing Director

Get in touch

AORIS

Suite 27.04, Level 27, 25 Martin Place, Sydney NSW 2000, Australia

+61 2 8098 1504 info@aoris.com.au

www.aoris.com.au

Morningstar Sustainability Rating









Signatory of:







Acknowledgement of Country

Aoris acknowledges the Traditional Owners of Country throughout Australia and recognises their continuing connection to land, waters and culture. We pay our respects to their Elders past and present.