



# Modern Slavery Statement

Ironbark Investment Partners Pty Limited

December 2024

*Please note that this Statement is currently being reviewed for submission by the Attorney-General's Department and has not yet been published to the Modern Slavery Statement Register [modernslaveryregister.gov.au](https://modernslaveryregister.gov.au).*



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## 1. Reporting entity

This Modern Slavery statement is prepared by Ironbark Investment Partners Pty Limited ACN 136 679 215 (**Ironbark**) pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) (the **Act**) for the reporting period 1 July 2023 to 30 June 2024 (**Reporting Period**) (**Statement**).

Ironbark is a proprietary limited company and is a 'reporting entity' for the purposes of the Act.

The Ironbark group consists of the following wholly owned subsidiaries of Ironbark:

- Ironbark Asset Management Pty Ltd (**IBAM**) ABN 53 136 679 420;
- IBWM Pty Ltd (**IBWM**) ABN 28 621 141 026;
- Invest Blue Pty Limited (**Invest Blue**) ABN 91 100 874 744;
- Invest Blue Support Pty Limited ABN 69 126 171 766;
- Ambassador Funds Management Services Pty Ltd (**Ambassador**) ABN 91 133 740 057; and
- Ironbark Investment Partners (UK) Ltd (Companies House Registration No. 14137415)  
(together, the **Ironbark Group** or the **Group, we, our**).

Whilst none of the above-listed subsidiaries were a 'reporting entity' during the Reporting Period, this Statement covers the Ironbark Group.

Appendix 1 details Ironbark's subsidiary and affiliate entities. These subsidiary entities have been named and referred to in this Statement based on their involvement in Ironbark Group operations.

This is Ironbark's second Statement, which outlines the foundational steps and actions that Ironbark Group took during the Reporting Period to establish a framework that will assist us in identifying, assessing, and managing the risks of Modern Slavery (as defined in section 1.1 below) within our operations and supply chain.

Statements made in this document referring to future events are made on a reasonable basis. However, forward-looking statements involve known and unknown risks and uncertainties that could affect the outcomes implied by such statements.

### 1.1 Our Values and Commitment

It aligns with the Ironbark Group values to continuously improve and develop the Group's framework and efficacy in addressing Modern Slavery risks in all forms.

The Group is committed to providing value to our clients, people and shareholders and contributing positively to the communities in which we are connected.

- **Being Accountable**
- **Working Together**
- **Aiming High**
- **Giving Back**

The Ironbark Group understands **Modern Slavery** to mean any act that is a crime against, or a violation of fundamental human rights. Modern Slavery takes various forms and includes slavery, servitude, forced labour, trafficking in persons, forced marriage, child labour, debt bondage and any other slavery-like practices.

**Modern Slavery risks** include a direct or indirect link to Modern Slavery that an entity within the Group may have, cause or contribute to through its operations or supply chain.

Ironbark Group is committed to addressing any risks of Modern Slavery that may be present within our operations and supply chain and implementing actions within our Group that will have a measurable impact on our organisation and the communities we operate within.

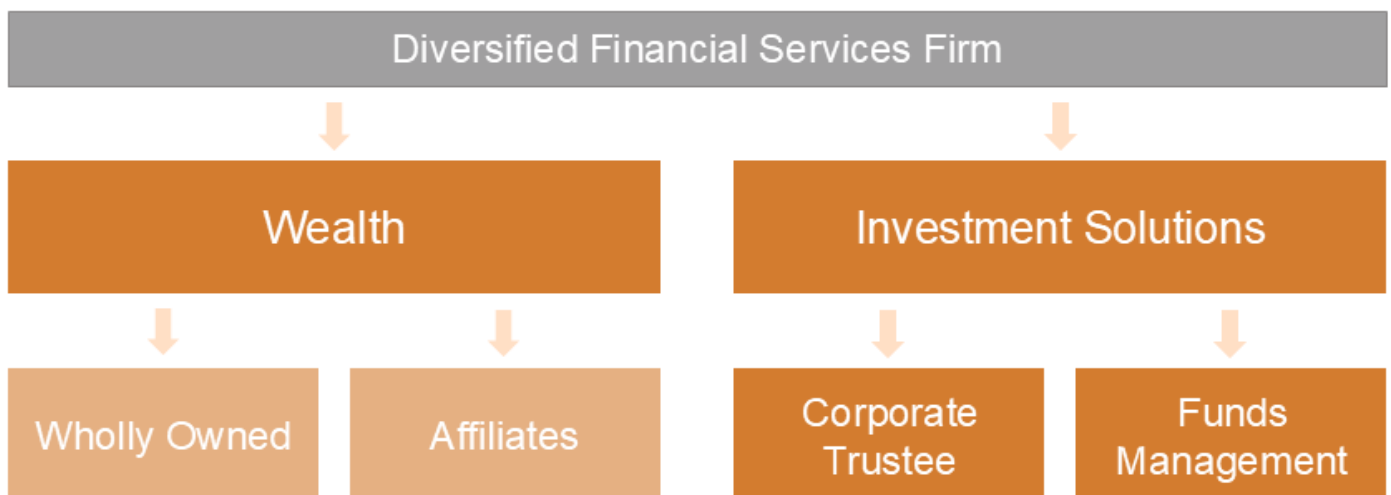
Ironbark is committed to continuing to enhance its framework and processes related to Modern Slavery in future reporting periods.

## 2. Our Structure and Operations

The scope of this Statement covers Ironbark Group's operations and role as a client-led, independent and diversified financial services firm.

The Ironbark Group provides a range of solutions to retail, wholesale, and institutional clients across Australia, including funds management, trustee services, advice, and wealth. Ironbark Group holds \$74.4 billion in funds under management, trusteeship and advice.<sup>1</sup>

Ironbark Group directly employs 415 people across 35 locations in Australia, including in Queensland, New South Wales, Victoria, the ACT and Tasmania.<sup>2</sup>



### 2.1 Wealth

Ironbark fully acquired the financial advice firm Invest Blue within the Reporting Period. As a wholly owned subsidiary of Ironbark, this acquisition has significantly broadened the scope of Ironbark Group's operations in the advice and wealth space. Appendix 1 includes a full list of Invest Blue subsidiaries involved in Group operations (collectively referred to as **Wealth**).

The Wealth business of Ironbark Group provides a holistic range of financial advice and solutions to clients in regional and suburban areas across Australia, with the objective of enabling clients to live their best possible life. Wealth provides a range of services including financial advice, insurance products, investment products, lending and administration services to a range of retail, wholesale and institutional clients.

### 2.2 Investment Solutions

The Ironbark investment solutions business includes the operations of IBAM, Ironbark Asset Management (Fund Services) Limited (**IBFS**) (a wholly owned subsidiary of IBAM), and Ambassador (collectively referred to as **Investment Solutions**).

<sup>1</sup> As at 30 June 2024.

<sup>2</sup> As at 30 June 2024.

### 2.2.1 Funds Management

IBFS holds the required financial services licences to act as the responsible entity or trustee to a range of developed and distributed products, partnering with investment managers located nationally and internationally to deliver best-in-class investment solutions to retail, wholesale and institutional distributors and investors.

The Investment Solutions business appoints foreign or domestic investment managers and undertakes governance, distribution and client servicing for Ironbark investment products and client products. Our products include exposures to a diverse range of asset classes including Australian and global equities, infrastructure, alternatives and private markets.

### 2.2.2 Corporate Trustee

Ironbark's Investment Solutions operations include its role as a corporate trustee. IBFS provides independent compliance, governance and product solutions, supporting and partnering with financial advice firms, licensees, fund managers and other clients across managed accounts, managed funds, multi-manager and single-manager solutions and registered and unregistered managed investment schemes.

These products include exposures to a diverse range of asset classes including Australian and global equities, infrastructure, private markets, fixed income and cash.

## 3. Our Supply Chain

Ironbark Group's supply chain encompasses the goods and services procured by the Group to facilitate the provision of its own products and services. Our primary suppliers are predominately located in Australia on stable, long-term contractual arrangements.

We have categorised our primary supply chain below as either **corporate resources** or **operational resources**.

Our corporate resources provide services directly to our locations across Australia and include providers of:

- information technology services (managed information technology providers, cyber security consultants);
- property related services and arrangements (leases and sub-leases, office service providers); and
- office services and supplies (cleaning and maintenance, office supplies, information technology equipment).

Operational resources provide a range of services which support the provision of our own products and services to clients, and include:

- external human resource support suppliers;
- external auditors;
- registry providers;
- professional service providers such as accountants and legal service providers;
- custody and administration service providers; and
- service providers related to Ironbark's Investment Solutions business, including external investment managers and research and rating providers.

### 3.1 Human Resource Support Suppliers

Ironbark Group's external human resource support suppliers are engaged to provide certain operational support services to the business through predominately long-term contractual arrangements.

During the Reporting Period Ironbark Group engaged individuals employed by five different providers to deliver support services across the Group.

Ironbark Group engaged service providers with employees located in the Philippines, a country with a moderate risk of Modern Slavery (as reported by the *Global Slavery Index*) to provide external support to the Group during the

Reporting Period.<sup>3</sup> The providers engaged by Ironbark Group have offices located in Cebu, Philippines and are contractually obliged to comply with certain policies including policies relating to employee health and safety standards, remuneration and Modern Slavery compliance.

Ironbark also engaged service providers with employees located in India, a country with a moderate to high risk of Modern Slavery (as reported by the *Global Slavery Index*) during the Reporting Period. These providers are subject to Ironbark's External Service Providers and Outsourcing Policy (outlined in section 5.2.2).

Further mapping and additional risk analysis, specific to Modern Slavery risks of Ironbark's service providers, including human resource support suppliers will occur in future reporting periods (outlined in section 5.3).

## 4. Modern Slavery Risks

Ironbark is committed to ensuring that its business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. Accordingly, Ironbark takes the risk of Modern Slavery in its operations and supply chain very seriously.

In the Reporting Period, Ironbark took steps to prepare and plan for a process of mapping and risk assessment for its operations and supply chain.

Ironbark considers that the risk of its operations causing, contributing, or being directly linked to, Modern Slavery practices to be relatively low. This is due to the nature of our business and most of our operations occurring in Australia which has the lowest vulnerability to Modern Slavery in Asia and the Pacific, as reported by the *Global Slavery Index*. Most of Ironbark's corporate resources are based in Australia and therefore we consider the initial risk of causing, contributing, or being directly linked to, Modern Slavery practices to be relatively low.

Ironbark intends to undertake a more comprehensive mapping of Modern Slavery risks within our supply chain in the next reporting period to better understand the potential for Ironbark to cause, contribute to or be directly linked to Modern Slavery. This mapping and risk assessment process will begin in the next reporting period with initial action targeting our corporate resources and human resource support suppliers, identified by the Modern Slavery Working Group and as a part of Ironbark's Strategic Plan for Modern Slavery (further outlined in section 5.1.2).

## 5. Our Actions

### 5.1 Our progress since FY23

Below is a summary of what we have achieved in this Reporting Period towards the development of the action areas identified in Ironbark's first Statement released in December 2023.

#### 5.1.1 Establishment of Modern Slavery Working Group

The development, implementation and continuous improvement of the Ironbark Group's approach to Modern Slavery is now led and informed by the Ironbark Modern Slavery Working Group (**Working Group**), formally established in this Reporting Period.

The Working Group reports directly to the Ironbark Board and is composed of representatives from across the Group to ensure a balanced and effective provision of advice and Group recommendations. The Working Group meets regularly to discuss of range of matters related to the advancement of the Group's approach to Modern Slavery.

The Working Group advises the Ironbark Board and executive leadership team on matters related to the development, implementation, monitoring and review of the Group's Modern Slavery Strategic Plan and related activities.

The Working Group's objectives are to:

- actively formulate and support the development and implementation of the Group's Modern Slavery Strategic Plan (as defined in section 5.1.2 of this Statement);

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<sup>3</sup> Walk Free - Minderoo Foundation, *The Global Slavery Index* (Report, 2023).

- assist the Group to determine the priority actions to be undertaken and establish goals and targets; and
- monitor and review actions taken to assess and address Modern Slavery risks and evaluate their effectiveness.

In this Reporting Period, the Working Group achieved the adoption and implementation of the Modern Slavery Policy and began work on establishing the foundational basis upon which the Group will integrate Modern Slavery awareness and risk assessment into the Group.

Actions taken include:

- the formal establishment of a cross-functional working group;
- assessing and understanding the obligations of the Act and developing a strategy with which to implement necessary action and change within the Group;
- undergoing a process of development related to supplier mapping and risk assessment; and
- implementing fundamental training which targeted the awareness and knowledge of Working Group members and Group Directors.

The Working Group continues to implement various initiatives across the Group to further develop Group awareness and actions targeting Modern Slavery risks in our operations and supply chain.

### 5.1.2 Adoption of Strategic Plan

The Ironbark Group Modern Slavery Strategic Plan (**Strategic Plan**), adopted in this Reporting Period, is aimed at improving and enhancing the outcomes of action taken by the Group relating to Modern Slavery over the long term. It clarifies the vision and objectives of the Working Group and serves as a roadmap to guide the decision-making and focus of the Group in relation to Modern Slavery.

|           |  |
|-----------|--|
| Objective | To implement actions within the Group that meet the expectations of our stakeholders and have a measurable impact in our organisation. |
|-----------|--|

In this Reporting Period, Ironbark Group led by the Working Group has implemented some key foundational objectives which are outlined in the Strategic Plan, including:

- formalising Modern Slavery obligations;
- formalising a Modern Slavery Policy;
- identifying existing policies and procedures that support action towards identifying Modern Slavery Risks and continuing to develop these policies and procedures to specifically target Modern Slavery;
- implementing a training and awareness program at a director and Working Group level; and
- engaging in a development process for supplier mapping and risk assessment.

The Working Group continues to implement and engage with the Group's Strategic Plan, particularly regarding the implementation of a more comprehensive supplier mapping and risk assessment process to identify any potential high-risk suppliers within our operations and supply chain and prioritise further evaluation and required actions.

### 5.1.3 Training our people

In this Reporting Period, Group Legal provided training to Directors of the Ironbark Group and the Working Group on Modern Slavery and the obligations under the Act. The implementation of this training and awareness program is part of the Strategic Plan.

We believe that Director training facilitates strong corporate governance and that an educated leadership will assist in fostering a culture of accountability, transparency and integrity. Training was also extended to the directors of Ironbark's Affiliate entities (Affiliates is defined in Appendix 1).

## 5.2 Current practices

### 5.2.1 Risk Framework

During the Reporting Period, Ironbark Group implemented a new Risk Management Policy and Framework at the Group level, which sets out Group’s approach to managing and mitigating risks across the organisation. Pursuant to this framework, Ironbark maintains a Risk Appetite Assessment, and Risk Matrix Review for each financial year, documenting risks inherent to the business and outlining control procedures.

The Group adopts the “three lines of defence” risk management model, in which business and support functions, risk functions and independent review are each responsible for ensuring appropriate controls are put in place to manage risks.

The framework promotes a strong risk management culture by providing appropriate resources for risk management functions, delivering ongoing training to relevant staff and requiring proactive identification of risks in day-to-day operations and decision making. Promoting a strong culture for the analysis and reporting of any potential Modern Slavery risks is the ongoing focus of the Working Group, including the integration of a Modern Slavery specific lens in this existing risk framework.

### 5.2.2 Our Policies

Ironbark maintains a comprehensive policy framework aimed at assisting the Group to fulfill its legal, regulatory and ethical obligations.

As noted in our previous statement, an assessment of the policies outlined below has identified that such policies directly and/or indirectly assist in reducing the risk of Modern Slavery across the Group’s operations and supply chain and allow for a holistic approach to identifying and managing risks of Modern Slavery.

| Policy   | Purpose   |
|--|---|
| <b>Modern Slavery Policy (new policy)</b>                | This policy is relevant to the Ironbark Group. During this Reporting Period, Ironbark approved and has begun to implement its Modern Slavery Policy. This policy sets out our obligations under the Act and identifies the processes and procedures related to Modern Slavery that will be followed within the Group, including how risks are to be identified and managed. The responsibility for the development, implementation and continuous improvement of this policy is delegated by the Ironbark Board to the Working Group.   |
| <b>Whistleblower Protection Policy</b>                   | Ironbark and its subsidiaries are committed to creating and maintaining a culture of corporate compliance and ethical behaviour in which employees and officers are responsible and accountable and behave consistently within Ironbark’s values with honesty and integrity. Ironbark and Invest Blue both have a Whistleblower Protection Policy that are designed to ensure that individuals who disclose wrongdoing can do so safely, securely, and with confidence that they will be protected and supported. Each entities Whistleblower Protection Policy is in accordance with the whistleblower protections under the <i>Corporations Act 2001</i> (Cth). |
| <b>Code of Conduct</b>                                   | Invest Blue and IBAM each have an employee Code of Conduct that ensure that Ironbark’s individuals meet ethical and professional standards, as well as meeting the requirements of the relevant Australian Financial Services Licences that Ironbark Group holds. These Codes of Conduct are regularly reviewed to ensure they reflects current laws and regulations.   |
| <b>External Service Providers and Outsourcing Policy</b> | Ironbark’s supplier due diligence is managed through this policy and is relevant to suppliers of IBAM and its subsidiaries. This policy provides for the appropriate oversight and monitoring of any outsourced function, ensuring that   |



| Policy                                   | Purpose  |
|--|--|
|  | these functions remain visible and appropriately monitored. All external service providers captured by this policy are subject to appropriate appointment, monitoring and risk assessment.   |
| <b>Investment Risk Management Policy</b> | This policy outlines the process used by Ironbark’s Investment Solutions for appointing, selecting and monitoring investment managers and the investment governance framework relating to the overall management of investment managers, funds and portfolios. The investment governance framework covers the structures, policies, procedures and people contributing to the governance of investment products. |

### 5.2.3 Supplier Due Diligence

Due diligence is conducted on any potential corporate resource supplier engaged to provide services to an entity with the Group. Areas of consideration within this process may include, but are not limited to:

- compliance requirements including licensing or registration requirements that may be applicable;
- understanding the training and competence of the representatives that will perform the service;
- governance and organisational structure;
- conflicts of interest;
- operational systems and procedures;
- geographical location;
- findings from external audits; and
- any litigation matters.

Ironbark adopts an active monitoring framework which includes annual due diligence of its external service providers.

Where Ironbark delegates an obligation to a service provider, the relevant Ironbark Board must approve the appointment. Due diligence findings for key service providers may be presented to either a committee that has been delegated the responsibility for oversight, or the Board of the entity that has appointed the relevant external service provider. Each external service provider is required to enter into an agreement which:

- a) reflects the scope of the expectations of the relationship, including the roles and responsibilities of both the service provider and Ironbark; and
- b) provides for the ongoing monitoring of the provider and standards and performance in light with agreed terms.

The supplier due diligence process has been assessed as indirectly assisting in minimising the risk of Modern Slavery within Ironbark Group’s supply chain by giving us visibility of our supply chain allowing us to identify areas of potential risk and setting expectations in relation to ethical practices and conduct.

Supplier due diligence is an ongoing action and focus area of the Working Group. The further development of this existing process to include a direct lens for Modern Slavery risks will occur in the next reporting period.

### 5.2.4 Investment Due Diligence

Ironbark’s Investment Solutions operations involve a range of investment activities that could expose the Group directly or indirectly to risks of Modern Slavery.

The Investment Solutions investment governance process (set out below) has been assessed as indirectly assisting in minimising the risk of Modern Slavery within Ironbark’s Investment Solutions operations by providing visibility within our investment operations and allowing us to identify risks.

The investment due diligence process includes:

- **Initial due diligence** – prior to appointment of an investment manager, due diligence is conducted on the investment manager covering the manager’s organisation, human resources, investment philosophy and product capability. Initial due diligence is conducted through meetings and discussions with the Manager, completion of a detailed questionnaire including sighting and reviewing key document including financials, insurance coverage, policies and procedures. The key findings of the initial due diligence are documented and reported to the Ironbark Multi Asset Investment Committee for managed accounts and the Ironbark Investment Committee for managed funds (each, the **Committee**).
- **Investment Committee and Board approval** – The due diligence performed on new managed account and managed fund managers is presented to and assessed by the relevant Committee. Once approved by the relevant Committee, it is submitted to the relevant Board for final approval. Review of agreements and governance for new solutions being developed by Ironbark’s Investment Solutions is the responsibility of the IBFS Board.
- **Ongoing monitoring** – investment managers are monitored by the investment governance team on an ongoing basis. Monitoring includes a review of performance, liquidity and stress testing results and compliance with the governing documents. Reporting includes any issues or key findings identified as part of the ongoing monitoring process.
- **Annual due diligence** – investment managers are formally reviewed by the investment governance team on an annual basis through a due diligence questionnaire and supporting documentation. Ironbark requests that the investment manager discloses any significant changes to the investment manager’s investment capability, organisation, operations, product or service providers over the last 12 months. The materials are reviewed and documented in an Annual Due Diligence report. Any issues identified from the initial and ongoing monitoring are followed up with the investment manager within a reasonable timeframe and, where required, escalated to the relevant Committee for review.

The investment due diligence process has been identified in the Strategic Plan as an area for further development in future reporting periods to incorporate an assessment of Modern Slavery risks relevant to the operations of Ironbark Investment Solutions.

### 5.3 Ongoing Action

The Group is committed to the development and continuous improvement of its processes and procedures in relation to the identification, assessment and management of Modern Slavery risks within our operations and supply chain.

As such, Ironbark intends to focus our efforts in the following areas over the course of the next reporting period:

- a) integration of Modern Slavery risks within existing risk frameworks and identified policies;
- b) expanding the training initiatives of Group Legal and the Working Group to a wider audience;
- c) commencing mapping of Modern Slavery risks related to the Group’s corporate resources to better understand the potential for Ironbark to cause, contribute to or be directly linked to Modern Slavery;
- d) conducting a risk assessment of the Groups human resource support suppliers to better understand any risks linked to Modern Slavery;
- e) strengthening the Groups supplier due diligence processes by embedding modern slavery considerations;
- f) creating and formalising a process for consultation on Modern Slavery risks in respect of Ironbark’s controlled entities; and
- g) further developing Ironbark’s Modern Slavery reporting capacity by integrating software within the Group that will enhance the capability of the Group to track, report and assess risks related to Modern Slavery.

Ironbark is committed to understanding the Group’s exposure to Modern Slavery and implementing any necessary action in line with our current framework. This commitment involves continuing and embedding the efforts of the Working Group.

## 6. Assessing Effectiveness

This is the second reporting period in which Ironbark has produced a Statement.

In this Reporting Period, Ironbark has continued to develop and formalise the standards by which it identifies, assesses and reports on Modern Slavery risks and the effectiveness of its actions. For this reason, the ability of the Group to assess the efficacy of its action is limited to a review of the foundational steps that it has taken throughout both the reporting period ending in 2023 and this Reporting Period.

Ironbark views these steps as important building blocks in creating an effective framework to identify and assess risks of Modern Slavery, which will assist us in being able to better understand, address and report on the Group's exposure in future reporting periods. Our actions to date have contributed to an increased awareness and understanding of Modern Slavery risks and Ironbark's obligations under the Act within the Ironbark Group.

Ironbark has yet to develop a formal review process by which to assess the effectiveness of Group action related to Modern Slavery. This is an ongoing focus area of the Working Group and is expected to be implemented concurrently with our Modern Slavery supplier mapping and risk analysis processes which will be deployed in the next reporting period.

## 7. Consultation

Consultation for the preparation of this Statement has been limited to the Ironbark Group entities identified in section 1 only. This consultation has been achieved through representation within the Working Group and input from the stakeholders of specific entities as the Statement was prepared.

Final approval for this Statement was sought from and granted by the Ironbark Board.

## 8. Other Relevant Information

### 8.1 Approval

This statement has been approved by the Board of Ironbark Investment Partners Pty Limited.



**Chris Larsen**

Director and Chief Executive Officer

*This document has been prepared by Ironbark Investment Partners Pty Limited ACN 136 679 215.*

## 1. Appendix – Entity Subsidiaries List

The following list includes entities that are owned or controlled by Ironbark's subsidiary entities.

| Invest Blue Subsidiaries |  |
|--------------------------|--|
|                          | Invest Blue Finance Pty Ltd  |
|                          | Invest Blue Armidale Pty Ltd   |
|                          | Invest Blue Brisbane Pty Ltd   |
|                          | Invest Blue Coffs Harbour Pty Ltd                                    |
|                          | Invest Blue Gladstone Pty Ltd  |
|                          | Invest Blue Norwest Pty Ltd  |
|                          | Invest Blue Penrith Pty Ltd  |
|                          | Invest Blue Terrigal Pty Ltd   |
|                          | Invest Blue Direct Pty Ltd   |
|                          | Cornerstone Financial Group Pty Ltd trading as "Invest Blue Lending" |
|                          | Advice First Pty Ltd   |
|                          | Brisbane Financial Services Pty Ltd                                  |
|                          | TDT (TAS) Pty Ltd  |
|                          | Wainscott Financial Planning and Advice Pty Ltd                      |
|                          | Advisory Group Pty Ltd   |
|                          | The Bravien Group Pty Limited  |
|                          | LFC Group Pty Ltd  |
|                          | LFC Advice Pty Ltd   |
|                          | Emohruo Financial Services Pty Ltd                                   |
|                          | Ogilvie Financial Services Pty Ltd                                   |
|                          | DKM Group Pty Ltd  |
|                          | Powers Wealth Pty Ltd  |
|                          | Financial Independence Planners Pty Ltd                              |
|                          | Paradigm Group   |
|                          | Growup Financial Pty Limited   |
|                          | Vintage Wealth Pty Ltd   |
|                          | CountryWide Advice Pty Ltd   |
|                          | CBS Financial Pty Ltd  |
|                          | Artt Group Pty Ltd   |
|                          | GR & LC Thompson Pty Ltd trading as "Artt Advice Dubbo"              |
|                          | Avanti Financial Group Pty Ltd                                       |
|                          | Elevate Financial Solutions Pty Ltd                                  |
|                          | Lifewealth Partners Pty Ltd  |
|                          | Lifewealth Pty Ltd   |

|                             |  |
|-----------------------------|--|
|                             | Hobart Financial Planning No. 2 Pty Ltd<br>Affinity Private Advisors 1 Pty Ltd   |
| IBAM Subsidiaries           | Ironbark Asset Management (Fund Services) Limited  |
| IBWM Affiliate Entities     | IBWM has a majority equity shareholding in Financial Foundations Australia Pty Ltd ( <b>FFA</b> ). FFA is named in this Statement in accordance with section 16(c) of the Act. FFA has not been consulted in the preparation this Statement and is not otherwise included in this Statement in any capacity. It is Ironbark's intention to expand the scope of our consultation and reporting in future reporting periods. |
| Ironbark Affiliate Entities | Ironbark through its subsidiary entities has direct equity investments in a number of affiliate financial services companies ( <b>Affiliates</b> ) which do not meet the definition of 'control' stipulated in section 4 of the Act during the Reporting Period. As such, Ironbark has not engaged these Affiliates in consultation for the preparation of this Statement.   |

## 2. Appendix – Mandatory Criteria

The following table indicates the sections within the Statement that address each of the mandatory criteria outlined in section 16 of the Act.

| Mandatory Criteria  | Sections |
|---|----------|
| Identify the reporting entity   | 1        |
| describe the structure, operations and supply chains of the reporting entity  | 2 & 3    |
| describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls;                            | 4        |
| describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes; | 5        |
| describe how the reporting entity assesses the effectiveness of such actions  | 6        |
| describe the process of consultation with:<br>(i) any entities that the reporting entity owns or controls   | 7        |
| include any other information that the reporting entity, or the entity giving the statement, considers relevant   | 8        |