

Modern Slavery Statement

Purpose of statement

This Modern Slavery Statement ('Statement') is made by WAM Capital Limited (ABN 34 086 587 395) (referred to as 'WAM Capital', 'we', 'our' or 'the Company') pursuant to part 3 section 24 of the *Modern Slavery Act 2018 (NSW)* and part 2 section 13 of the *Modern Slavery Act 2018 (Cth)* in respect of the year ended 30 June 2021.

This Modern Slavery Statement discloses WAM Capital's progress towards identifying and addressing modern slavery risks within our business and supply chain, including the activities that we will continue to implement in 2022.

Overview of WAM Capital's business, structure and operations

WAM Capital is a listed investment company (LIC) managed by Wilson Asset Management (International) Pty Limited (the Investment Manager or Manager). Listed in August 1999, WAM Capital provides investors with exposure to an actively managed diversified portfolio of undervalued growth companies listed on the Australian Securities Exchange, with a focus on small-to-medium sized industrial companies. The Company's investment objectives are to deliver investors a stream of fully franked dividends, provide capital growth and preserve capital. WAM Capital's wholly owned subsidiaries, Wealth Defender Equities Pty Limited, Tucana Pty Limited and Concentrated Leaders Fund Pty Limited are predominately dormant and do not have any operations, outside the operations of the parent entity in WAM Capital, that present risks in relation to modern slavery for the Company.

WAM Capital recognises the key role played by the Investment Manager and its related bodies corporate (the Wilson Asset Management Group) in the affairs of WAM Capital. The Wilson Asset Management Group provides investment management services and other administration services and is responsible for monitoring and reviewing the performance of external suppliers to WAM Capital, which has no employees of its own.

Our approach

WAM Capital does not tolerate modern slavery within its business operations and takes a risk-based approach in respect to its supply chains. We are committed to acting ethically in all our operations and throughout our supply chain. WAM Capital conducts all business to high levels of ethical and professional standards and in accordance with applicable laws and regulations, and the standards of conduct as set out in our [Code of Conduct](#), which has been approved and adopted by the Board of Directors.

Supply chains

WAM Capital considers that, as our business is regulated and does not have complex supply chains, the risk of modern slavery occurring within our operations or general supply chains is low. Furthermore, the sector and locations in which we operate represent a relatively low risk of modern slavery. Our suppliers mainly comprise professional service firms, including a custodian, share registrar, banks, auditors and law firms. We also outsource services relating to, among others, branded media and printing.

In addition, the Wilson Asset Management Group's investment team actively engages with investee companies and their management during the stock selection process to discuss material risks, ranging from business and operational risks to environmental and social risks. We are committed to monitoring investee companies and should we become aware of any direct involvement in modern slavery practices, we will endeavour to engage with these companies on an active basis where we believe that action is required.

Actions taken

Despite the low risk of modern slavery taking place within our operations and supply chains, WAM Capital is committed to developing initiatives to improve our understanding of and capacity to identify and manage modern slavery risks.

We will seek confirmation from the Wilson Asset Management Group and our other key existing suppliers that they have not committed or been notified of, or placed under investigation for, any offences relating to modern slavery. We will further seek confirmation that none of our key suppliers are aware of any circumstances within their supply chain that could give rise to an investigation or prosecution for any offences relating to modern slavery.

Due diligence processes have been developed to assist employees of the Wilson Asset Management Group with procurement responsibilities to assess the risks regarding modern slavery when making procurement decisions. Prior to the appointment of any new supplier, we or the Wilson Asset Management Group undertake due diligence to ensure that each new supplier addresses the issue of modern slavery in their operations and supply chains. Furthermore, as part of any new contract terms, suppliers are obliged to notify us if they become aware of any modern slavery offences occurring in their business or in their supply chain. Suppliers are also required to confirm that they are continuously taking steps to identify risks and prevent occurrence of modern slavery offences within their businesses.

WAM Capital will review the procurement processes that it and the Wilson Asset Management Group implements on our behalf on an ongoing basis to enhance the due diligence of our material suppliers to ensure coverage of all applicable anti-slavery laws.

The Wilson Asset Management Group is also in the process of providing dedicated training for its employees with direct responsibility and accountability for procurement and supplier responsibilities. This will also ensure relevant employees take appropriate action where modern slavery risks are suspected or identified, including how to engage with suppliers when a concern or incident is raised.

Monitoring our effectiveness

Whilst we believe that the risk of modern slavery within our operations is low, we recognise the need to regularly monitor and evaluate the performance of our supply chains. For our key suppliers, we carry out checks as part of our annual due diligence review to ensure we continually monitor and assess potential risks or issues that may arise within our supply chain. More detailed assessments of these suppliers shall be completed where deemed necessary.

In addition, WAM Capital maintains a [Whistleblower Policy](#), through which any employee and their families (current or past), directors, contractors and suppliers can raise concerns regarding actual or suspected unethical behaviour or breaches of Company policy, without fear of reprisal or dismissal.

Statement review

The Modern Slavery Statement is reviewed annually, and any recommended changes will be approved by the Board of WAM Capital as specified in this

document. Any changes to this Statement will not take effect until published.

This Modern Slavery Statement was approved by the Board of WAM Capital Limited.

Signed



Geoff Wilson AO
Chairman
WAM Capital Limited

Date: 16 December 2021