

# Modern Slavery Statement

RFC Ambrian Group Limited  
RFC Ambrian Funds Management Pty Ltd

11 April 2024

In accordance with the Modern Slavery Act 2018, this statement outlines the steps that RFC Ambrian Group Limited (ABN 98 096 493 588) (“RFCAG”) has taken, and is continuing to take, to assess and reduce risks of modern slavery within our business and our supply chain, and our plans for review and improvement.

Mandatory Criteria	Section
Identify the reporting entity	Section 1. Reporting entity
Describe the reporting entity’s structure, operations and supply chains	Section 3. Our Structure, Operations and Supply Chains. Section 4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 4 & 5. Assessing and Addressing our Modern Slavery Risk for Operations and Investments
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Section 4 & 5. Assessing and Addressing our Modern Slavery Risk for Operations and Investments
Describe how the reporting entity assesses the effectiveness of these actions	Section 6. Future developments
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Section 6. Future developments
Provide any other relevant information	Section 2. Our approach to Modern Slavery risks

This statement has been reviewed and approved by the RFCAG Directors:



Rob Adamson  
Executive Chairman



Stephen Allen  
Managing Director

## 1. Reporting Entity

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In accordance with the Modern Slavery Act 2018, this statement outlines the steps that RFC Ambrian Group Limited (ABN 98 096 493 588) (“RFCAG”) has taken, and is continuing to take, to assess and reduce risks of modern slavery within our business and our supply chain, and our plans for review and improvement.

## 2. Our Approach to Modern Slavery Risks

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RFCAG recognises the potential for modern slavery risks to emerge in its supply chain, including investments, clients and service providers and understands the need to identify potential risks. To date we have:

- mapped our supply chain;
- generated a list of countries and sectors of our direct involvement.
- conducted a modern slavery risk assessment of our supply chain; and

RFCAG has considered FSC Guidance Notes 40 *Responding to Modern Slavery Reporting Requirements*, including the concepts of oversight and materiality in its overall approach to modern slavery.

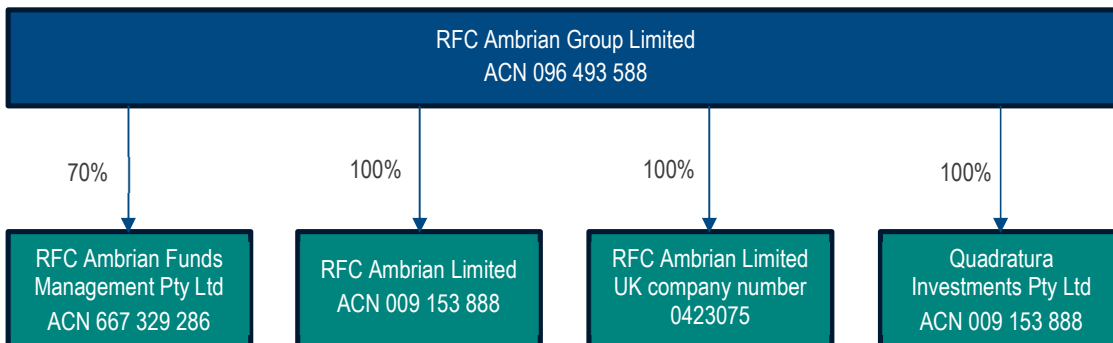
During the during the March 2024 quarter, we:

- assessed potential investee companies for modern slavery risks.

## 3. Our Structure, Operations and Supply Chains

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RFCAG conducts business as a corporate financial advisor including a funds management business, corporate service provider and investor. Active subsidiaries are listed below.



RFC Ambrian Funds Management Pty Ltd (“RFM”) is a manager of institutional funds, and invests into critical minerals (private and listed companies) and decarbonisation technology (private venture capital) investments. Investment activities are focused in Australia, Canada and the United States.

RFC Ambrian Limited provides corporate advisory activities including, but not limited to:

- strategic advisory;
- corporate actions including asset sales, IPOs, takeover defence and M&A deals;
- raising capital on behalf of clients;
- assisting with the creating of new companies, including business planning, recruitment, governance and execution;
- providing investment professionals and corporate services to RFM; and
- attendance to compliance functions including audit and taxation management.

RFC Ambrian Limited (UK) provides similar services to RFC Ambrian Limited, but on a reduced scale.

Quadratura Investments holds various principal investments of RFCAG, including private and unlisted companies.

RFCAG operates out of Sydney, Perth and London, with approximately 18 staff.

RFCAG's supply chains are limited to purchasing goods and services to support the services we undertake across our offices. Our office in London is a virtual office where we engage contractors who work from home. Our spend is typical of a professional services firm, and includes the use of other professional services firms, office space (including ancillary services), office consumables, office and IT equipment.

## 4. Assessing and Addressing our Modern Slavery Risk (Operations)

RFCAG's supply chain consists of professional service providers, real estate managers, logistics and miscellaneous goods suppliers. As a part of selecting material suppliers, RFCAG will assess modern slavery risk of the proposed supplier.

### 4.1 OUR SUPPLY CHAIN

Materially, all our supplier's operations are based in Australia. We believe these suppliers have a lower risk of modern slavery occurring in their supply chains, as their operations are Australian based, they are required to comply with the Modern Slavery Act within their own supply chains.

All employed staff are provided entitlements and conditions that comply with local legislation and regulations in Australia and the UK. Australia and the UK are both highly regulated labour markets.

### 4.2 MODERN SLAVERY RISK ASSESSMENT – OPERATIONS

RFCAG has completed a modern slavery risk assessment for its operations, inclusive of subsidiaries and has assessed its internal exposure to modern slavery as low.

## 5. Assessing and Addressing our Modern Slavery Risk (Investments)

A risk-based framework will be applied in relation to the assessment of RFM's investment activities and will factor jurisdiction risks. As a part of our investment due diligence process, we incorporate a negative screen as a part of our due diligence process for all material suppliers, including a modern slavery questionnaire as appropriate (e.g. where risks were identified as 'medium' or higher).

Countries where RFM currently invests in include:

- Australia

## 5.1 MODERN SLAVERY RISK ASSESSMENT – RFM INVESTMENTS

RFM has completed a modern slavery risk assessment across its investee companies and has assessed its exposure to modern slavery as low.

## 6. Future Developments

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RFCAG intends to further develop its approach to modern slavery compliance.

Throughout FY24, we intend to:

- assess modern slavery risks of new suppliers and investee companies;
- outline a framework for assessing our effectiveness;
- conduct an annual review of our modern slavery risk assessments;
- incorporate the modern slavery risk assessment as a part of our onboarding (KYC) and due diligence processes; and
- where appropriate work with material suppliers or investee companies with a 'medium' risk or above and as applicable, help them embed Modern Slavery Act compliant procedures.