



ESG Report  
October 2022

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## Overview

Omni Bridgeway Limited (**Omni Bridgeway** or the **Company**) is pleased to publish its 2022 Environmental, Social and Governance (**ESG**) Report for the financial year from 1 July 2021 to 30 June 2022 (**FY22**). It is an account of how we integrate sustainability principles into our business. Omni Bridgeway is committed to good stewardship of investor funds and believes that making a positive impact on the environment and the societies in which we operate is an integral part of delivering long term value for our employees, investors and other stakeholders. As with all aspects of our business, we adopt ESG practices that support value creation and we are conscious that this requires those practices to be reflective of, and align with, the scale of our business and its operations.

During FY22, we progressed our ESG initiatives and have adopted the globally recognised reporting Standard provided by the Sustainability Accounting Standards Board (SASB) and its guidance for companies in the Asset Management & Custody Activities sector. This is our first report prepared according to the SASB Standard.

The Standard has a particular focus on the information needs of institutional investors and was chosen by the International Sustainability Standards Board and the IFRS Foundation in November 2021 as the preferred reporting framework for harmonizing sustainability disclosures for financial markets globally. We also recognise that there are other sustainability issues that are relevant to the Company, and we include them in this report.

The ongoing impact of the COVID19 pandemic on economic, business, and social conditions in FY22 continued to be challenging. The demands of managing our business through the ongoing pandemic have required some changes to the way we work but we have remained focused, adapted our approach where necessary and continued to execute on our strategic priorities.

This report is arranged in three sections – Environment, Social, and Governance – and captures the issues that are of most relevance to the Company.



# Environmental

## Climate Change

Unlike many of our peers, we do not operate a fly-in-fly-out operating model. The Company has adopted a local presence strategy with our employees working from 23 global locations. This strategy reduces our reliance on global travel resulting in a lower carbon footprint.

We encourage our employees to use public transport during their daily commute to work, as an extra way to further reduce our carbon footprint. In our Amsterdam office, we have a company bicycle scheme whereby employees receive tax benefits if they commute to work using an electric bicycle.

During FY22, COVID19 continued to heavily restrict international business travel and consequently, videoconferencing was used to bridge the gap left by the absence of physical meetings.

As we emerge from COVID19, we are conscious of the environmental impact that may occur from the resumption of international travel and have proactively sought ways to reduce our carbon footprint.

In August 2022, we began using an end-to-end carbon offsetting solution, that will enable us to reduce the carbon footprint of our travel to net-zero. This program delivers a set of tools to enable us to make more sustainable travel decisions. The program displays carbon emissions associated with all options for our corporate travel needs and allows us to sort these based on carbon emissions, at time of booking.

The program is currently available to be used by our team in Australia, Asia, and the US. It provides us with detailed information on the carbon footprint of our corporate travel which we will include in our ESG Statement next year.

## Pollution and Resources

Although we are a global business operating in 23 locations, 134 of our 199 (67%) employees operated from the Sydney, Perth, Amsterdam, and New York offices on 30 June 2022. We encourage all employees across our office network to adopt work practices that promote environmental sustainability. In this report, we provide further details on the initiatives undertaken in the Sydney, Perth, Amsterdam, and New York offices, to demonstrate how we practice environmental sustainability.

Across our business, we encourage all staff to be sensitive to environmental concerns and support recycling in all offices through the provision of appropriate facilities. Our largest use of recyclable material is paper. In the Sydney, Perth, Amsterdam, and New York offices, recycling is supported by the provision of cardboard/paper, commingled and general waste bins.

We do not collect separate recycling data for our offices as this service is handled by external providers.

Employees are also encouraged to limit printing and set double-sided printing as default, to reduce using physical resources such as paper and printer toner. We digitalise invoices and filing processes to reduce our need for printing. In our Perth office, all used toner cartridges are returned to the supplier, who operates an approved manufacturer recycling program. All outdated IT equipment from our Perth, Sydney, and New York offices are disposed of by a specialist provider of e-waste recycling and disposal.

Air-conditioning appliances and IT servers (where they are installed) are the largest users of electricity. All office premises are leased, which does limit our ability to install energy saving devices across our office locations. However, to the extent that we can influence energy consumption, we proactively adopt strategies to reduce our usage. Many of our offices have automatic lighting set by motion detectors and after-hours automatic time cut off for both lighting and temperature control. Many of our offices including Sydney, Perth, Amsterdam, and New York have LED motion sensor lighting installed that detect employee movements to switch lights off in unoccupied areas. Employees are also encouraged to be mindful of their energy usage and take steps such as closing office blinds in summer to reduce energy consumed.

Our Amsterdam office is based in the WTC Schiphol Business Club which received a BREEAM In-Use Certificate on 1st November 2021. This means that following an independent assessment, the office has been rated as "good", for environmental performance of the building and property management practices. Approximately 50% of commercial properties get certified by BREEAM as good.

The building owner of our New York office has recently engaged with energy consultants to explore ways of improving the building's green credentials and with a view to obtaining Leadership in Energy and Environmental Design (LEED) certification in the future.

We do not collect separate emissions data for our offices.

## Water Security

Although water usage is minimal across our office premises, we do focus on reducing this where possible.

The Perth office has water efficient taps and showerheads installed throughout the tenanted space, along with low flush cisterns. The Sydney office has automatic sensor tapware in the bathrooms and low flow fixtures installed in the kitchen.

# Social

## Diversity and Inclusion

As a truly global business, comprising a broad group of individuals operating in 23 locations throughout the world, we embrace diversity in all its forms and encourage the contradictor in every aspect of our business. This is intended to mitigate the perils of group think, to bring diversity of thought, more informed decision-making, and ultimately better business outcomes.

We will continue to implement initiatives and measure our performance in areas of Diversity (employing people with a range of identities), Equity (creating systems that ensure everyone is treated fairly), Inclusion (ensuring all voices are heard) and Belonging (endeavouring to make Employees feel accepted, supported, and included).

During FY22, we implemented several DEIB practices including the introduction of pronouns on email signatures/business cards and the inclusion of DEIB-focused questions in the Employee Survey.

The Company has a Diversity Policy that explains our intentions in relation to diverse recruitment and equal opportunity in promotion, remuneration and development. It also outlines our commitment to reporting gender diversity. This policy can be accessed at <https://omnibridgeway.com/corporate-governance>. The Company also has an Employee Resource Group for LGBTQIA+ employees and allies.

To satisfy the SASB Standard for companies in the Asset Management & Custody Activities sector, we provide information on gender and racial/ethnic group representation below.

### Gender Representation

Guided by the SASB reporting framework, the charts below report on gender representation across the business.

As the business came out of the COVID19 pandemic during FY22, our hiring efforts increased. The Company recruited 31 women which accounted for 47% of all new recruits in FY22.

The Company supports female representation at senior leadership and Board levels. We have set a measurable objective of having not less than 30% of our directors identifying as female. The Company has also set the same 30% gender objective for senior executives.

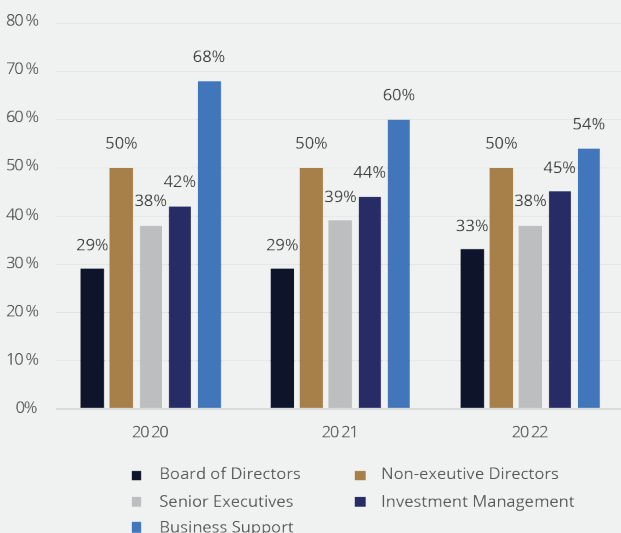
To monitor the Company's gender diversity, the Board receives an annual report that details female representation at all levels within the business. On 30 June 2022, the female composition of the Board was 33%, and the female composition of the Non-Executive Directors remained at 50%. Female representation was 50% across all Board committees and exceeded 30% for the Investment Management (45%) and Business Support (54%) Teams, on 30 June 2022.

At the Annual General Meeting in November 2022, Mr. Michael Bowen will retire as a Non-Executive Director. Following his retirement, the female composition of the Board will be 40%, and the female composition of the Non-Executive Directors will be 67%.

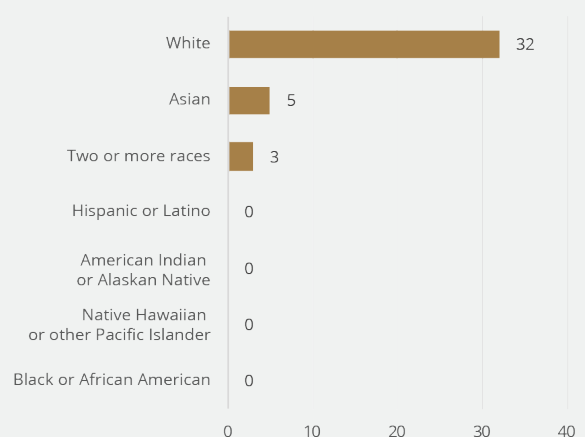
### Racial and Ethnic Representation

The Company does not currently ask all employees to self-report race and ethnicity data; however, the US region does require employees to report this information for compliance with the US Equal Employment Opportunity Commission (EEOC) requirements. To comply with the SASB reporting framework, this information is reported for US employees in FY22.

Female representation over time

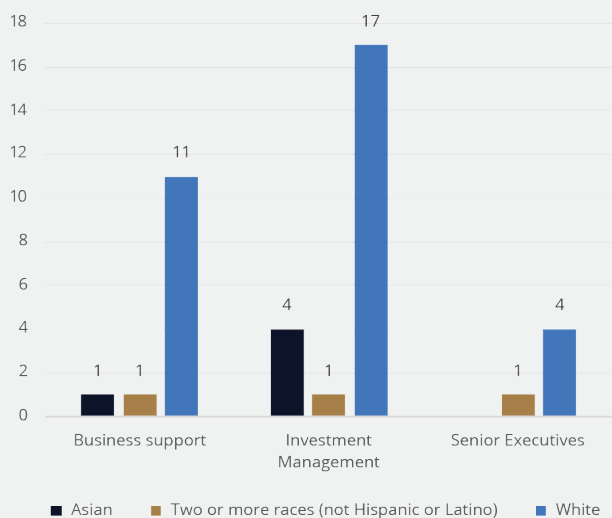


US racial diversity – headcount by EEOC category





### US racial diversity – headcount by role type



Our US headcount was 40, with racial diversity comprising (i) 80% white, (ii) 12.5% Asian and (iii) 7.5% two or more races.

### Employee Engagement

We recognise that engaging and retaining our most valuable assets, our employees, is critical to our overall business performance. In FY21, we carried out our first annual Employee Engagement Survey to receive feedback on how satisfied and motivated our employees were in their workplace. During FY22, we continued to refine our approach by introducing the Risk Culture Survey to assess how well the Risk Framework was embedded across the organisation.

Currently, the Survey is managed internally using the Survey Monkey Platform. We will conduct our third Employee Engagement Survey in early 2023, after we complete a review to optimise the question set.

### Parental Leave

We have offered a paid parental leave program since 2008 to support our employees following birth or adoption. The program is designed to assist employees who are primary carers maintain their usual average pay for a period of up to 16 weeks during their parental leave. The program was recently updated to allow employees who are secondary carers to maintain their usual average pay for a period of up to two weeks.

### Health and Wellbeing

At Omni Bridgeway, we recognise that wellbeing is more than just the absence of illness and injury, and that our workplace culture and environment contributes significantly to employee wellbeing.

In Australia, we have engaged Benestar who administers an Employee Assistance Program (EAP) to provide employees free and confidential assessments, along with short-term counselling that supports them with personal or work-related problems. A similar EAP is offered to other employees outside of Australia. Employees receive information on how to access the program via our employee intranet. During FY22, we partnered with Leadium, a provider of executive coaching programs, to deliver wellbeing programs focused on mindfulness to all employees.

Other ongoing initiatives include fitness programs, and regular check-ins between employees and people leaders.

A major focus of our sustainability agenda has been the management of COVID19. From FY21, we took steps to ensure the safety and wellbeing of our employees. Protocols were introduced to avoid workplace transmission (e.g., social distancing within office locations, requiring employees to stay home if a household member was unwell and isolating for seven days if a household member tested positive). A vaccination policy also required employees to be vaccinated for office attendance; however, this policy is no longer in effect.

### Community

Omni Bridgeway has a strong track record of financing cases that advance public interest and provide access to justice. We also support thought leadership that advances the industry through our participation in industry associations such as the International Litigation Finance Association and the European Litigation Finance Association and education that guides future generations. Our people engage in community focused activities in each of the communities in which we live and work, undertaking volunteer work, providing pro-bono services, and participating in charitable initiatives such as STEptember and the Walk for Justice, in support of JusticeNet SA. We also provide a contribution to the NSW Public Interest Advocacy Centre Indemnity Scheme to support the litigation it pursues.

Over the year, we have provided research funding to universities and donations to charitable organisations – typically donor matching for the charitable events in which our staff chose to participate.

### Support for Young Lawyers

As a leading global litigation funder, we are committed to the future of our industry and actively encourage aspiring law students to pursue careers in this sector. In August 2022, we launched our inaugural Summer Associate Program in the US. This is a paid internship program of 10-weeks designed to give exceptional law students hands-on experience in litigation finance. The internship is structured as a rotation between our New York, Los Angeles, San Francisco, and Houston offices. This year, one student from Georgetown University Law Centre and another student from Howard University School of Law have participated in the program.

We also support law students through the Australian Corporate Counsel summer clerkship program.

## Incorporation of ESG Factors in Investment Management

Omni Bridgeway's core business delivers a clear social and environmental benefit – a central component of the Company's business is, and always has been, the provision of finance to claimants with worthy claims but without the financial means to advance them. The funding and enforcement solutions can provide these claimants with access to justice in circumstances where they may otherwise have been precluded. In addition, the disputes which we invest in are claims for compensation for those who have suffered loss because of breaches of law by wrongdoers. Financing these claims acts as a deterrent to other potential wrongdoers, which in turn benefits society more broadly.

The Company has created a sustainable business of legal asset investment benefitting a broad range of claimants. Omni Bridgeway only receives a return where our client's claim is successful, and our returns are proportionate to the costs and risks we accept in funding a case.

### *Amount of Estimated Portfolio Value (EPV) that considers ESG Factors*

Omni Bridgeway provides funding to claimants across a broad spectrum of industries and circumstances. Our work in the area of class actions is the most visible example of an ESG themed investment, given that the benefits arising from a successful judgement can positively affect large numbers of people. The public prosecution of the claim can also serve to act as a deterrent to similar behaviour recurring in the community. Class Actions represented 20% of EPV globally in FY2022.

In Fund 6, including its investment in the Distressed Asset Recovery Program (DARP) of Fund 7, we employ screening to prohibit the financing of investments that have negative ESG characteristics. Fund 6 represented 16% of EPV in FY2022.

The integration of other ESG issues, whereby qualitative and quantitative information is employed in the investment process to improve investment decision-making, has to date not been a formal part of the investment process.

### *Approach to the Incorporation of ESG Factors*

As the Company's investments are in legal assets, the investment process is heavily focused on an extensive formal due diligence process that takes place prior to the funding decision. As part of this process, we avoid 'bad actors' or cases that will adversely impact our reputation however, this is not described by formal ESG criteria.

The Company is currently investigating the establishment of an ESG fund which would directly focus on using ESG data as part of the investment process.

As noted above, as class actions are rarely pursued in the absence of litigation financing, we regard class actions as an ESG-themed investment that deserves enhanced attention as they provide an important social benefit in equal access to justice to class action members.

As noted above, ESG screening does occur in Fund 6 and the DARP business, by virtue of the requirements of our funding partners.

Our Fund 6 Partner has a Responsible Investment Policy and Exclusion List. Fourteen countries and companies engaged in the following industry sectors are also screened:

- Controversial Weapons.
- Nuclear Weapons non-NPT.
- Oil Sands.
- Thermal Coal.
- Tobacco.

There are no active investments in the DARP business, however, we partner with the International Finance Corporation (IFC). The IFC precludes investments in companies that are engaged in the production or trade of:

- Weapons and munitions.
- Alcoholic beverages (excluding beer and wine).
- Tobacco.
- Gambling and casinos.
- Radioactive materials.
- Unbonded asbestos fibres.
- Drift net fishing in marine environments.
- Harmful or exploitive forms of forced labour.
- Commercial logging, other than sustainably managed forestry.

### *Description of Engagement Policies and Procedures*

The litigation funding process varies widely depending on the circumstances of the case in question, and the jurisdiction where the proposed investment is located. Notwithstanding this, all engagements will typically include the following steps.

- **Non-disclosure agreement.** We will commence the funding process by requiring all parties to execute a non-disclosure agreement (NDA). This protects confidentiality and permits free flow of information among the client, the lawyers and Omni Bridgeway. The NDA allows the Company to comprehensively assess the merits of the dispute at issue.
- **Initial case analysis.** When Omni Bridgeway has gathered the initial information and documentation from the client and lawyers under the NDA, we will then conduct an initial analysis of the case. This analysis is used to determine if the matter suits our investment criteria. We look for cases with:
  - Good prospects of success when objectively assessed.
  - A measurable commercial benefit. The Company will generally not fund more than 10% of the realistic claim value.
  - The opponent must be capable of paying a judgement or settlement (and there are good prospects of enforcement).



- **Term sheet.** If Omni Bridgeway and other parties share a mutual interest in proceeding, we will propose a term sheet to the claimant. The term sheet may include proposed funding costs, Omni Bridgeway's proposed return on investment, further due diligence required, and typically an exclusivity period to conduct this further due diligence.
- **Due diligence.** Omni Bridgeway will often conduct extensive due diligence into its investment opportunities. Further due diligence will assess the strength of the case and defences, quantification of damages, litigation strategy and settlement prospects, the claimant as a counterparty to a funding arrangement, prospects of recovery and project budgeting. In this stage, Omni Bridgeway may engage external experts to assist with our assessment, at the cost of the Company.
- **Funding decision.** The Company's Investment Committee comprises experienced lawyers, funding professionals, enforcement/recovery specialists and former judges who will assess the investment and ultimately make a funding decision. If approved, a formal offer to fund a case will be made in the form of a Litigation Funding Agreement (LFA).
- **Monitoring.** Omni Bridgeway takes a "light-touch" approach to the post-investment monitoring of matters. In some jurisdictions, the Company is not permitted to exercise control over the lawyers' strategy decisions and generally are afforded limited rights in this regard under the LFA. Omni Bridgeway does have the right to be informed of settlement offers and major case developments, and thus, the Company will regularly engage with lawyers and claimants to monitor its investment.

## Data Security

Our clients trust us with their most confidential information, most of which is highly sensitive, legally privileged, and susceptible to cybercrime in the absence of proper protections. We acknowledge this and have chosen to explain our processes in this Report.

The Company recognises the importance of keeping electronic information private and safe from damage, theft, or misuse. Consequently, it has adopted an IT and Cybersecurity Risk Management Policy. The policies and procedures covering incident response and data protection and security are covered in the Omni Bridgeway Group's Business Continuity Plan. These policies operate in conjunction with the Group Privacy Policy that can be accessed at <http://omnibrigeway.com/corporate-governance>.

Omni Bridgeway endeavours to pursue a "Defence-in-Depth" strategy that provides multiple mechanisms to protect data and information to achieve the Company's cybersecurity goals. The IT and Cybersecurity Risk Management Policy describes our approach to cyber risk management which includes procedures for Access Management, Asset Management, Network Management, Systems Management (including vulnerability management), Risk Incident Management, Data Backup, and maintenance of cybersecurity insurance. Our Third-Party Risk Management Policy further describes our approach to assessing the cybersecurity risk of external service providers and determining appropriate review and response.

We have adopted a standardised framework which is formalised in our "Vulnerability Management Plan" Omni Bridgeway Group's information security controls are periodically reviewed by its IT Resources. Monitoring and reporting activities include quarterly reports of compliance with the Cybersecurity Policy and effectiveness of cybersecurity controls being made to senior management and the Board.

Omni Bridgeway has also adopted a Data Breach Response Plan intended to enable the Company to assess, contain, respond to, and remediate data breaches promptly and comprehensively. The Plan has been designed to comply with the General Data Protection Regulation, and its key objectives are to ensure the Company is appropriately engaged and prepared to respond to a data breach, minimise the impact of a data breach on the Company and others involved in a data breach, ensure all actions are documented when responding to a data breach and make any required notifications to affected individuals and relevant authorities.

Management commissions regular external penetration testing on IT infrastructure and has implemented cloud-based and on-premises technologies to mitigate the risk of intrusion and data breach. The Company is also working towards attaining a Tier 3 rating under the National Institute of Standards and Technology Cybersecurity Framework, which integrates industry standards and best practices to help organizations manage cybersecurity risks.



The Company conducts periodic training on information and data security to ensure awareness of the most common security threats and how to detect them, including tips on how to detect email phishing attacks. This training is required when a new hire commences employment and annually thereafter. Training attendance is monitored, and all staff are required to attend training courses throughout the year where attendance has been mandated as compulsory.

Staff are regularly informed of current attack types via email/intranet updates. Regular friendly phishing exercises are performed across the Company.

### **Data Lifecycle**

The Group's Global Privacy Policy (explained above) describes the approach to collection, usage, processing, disclosure, retention, and destruction of personal information. The Global Privacy Policy is compliant with the privacy regulations in the jurisdictions in which the Company operates. The Privacy Policy is supported by the Data Retention and Destruction Policy, that was approved in February 2021 and is updated annually. This is an internal policy and is not published on the Company's website. The Policy sets out that all Documents must be maintained securely and confidentially in compliance with company policies and relevant Privacy Laws. When personal information is no longer required, steps must be taken to either destroy the Documents or to "de-identify" the information (unless required by law to retain the information).

### **Compliance Risk**

As a global business, the Company is subject to many regulations. The Company's wholly owned subsidiary, Omni Bridgeway Investment Management Ltd., is the holder of an Australian Financial Services License (AFSL) and is authorised to operate Litigation Funding Schemes. Omni Bridgeway Management LLC., a wholly owned subsidiary of the Company, is a registered investment adviser with the U.S. Securities and Exchange Commission (SEC) under the Investment Advisors Act and conforms to all relevant legislative and regulatory requirements to ensure that investors are protected. Our compliance program has been designed to ensure adherence to these requirements and includes the adoption of a Code of Ethics and compliance policies.

Other relevant external industry codes include the Hong Kong Code of Practice for Third Party Funding of Litigation, and the UK Association of Litigation Funders Code of Conduct.

Compliance risk is managed in accordance with the Group's low tolerance for compliance failures and compliance risk management culture. The Board is responsible for the oversight of compliance risk at the Company. The Board receives reports from the Chief Executive Officer (CEO), Chief Risk Officer (CRO), Head of Compliance and Risk, Group General Counsel, and key control functions, including the Chief Financial Officer (CFO). Where issues are identified, senior management and compliance, risk and control functions will contribute to the development and ongoing oversight of corrective action plans.

The Head of Compliance and Risk is responsible for undertaking the compliance activities in support of the Compliance Program. The Compliance Program includes regulatory identification and change management, regulatory relationship management, new risk assessments, monitoring and testing, breach and incident identification, analysis, training, and reporting.



## Transparent Information & Fair Advice to Clients

Omni Bridgeway's customers include (i) companies, (ii) retail and sophisticated clients in our class actions, (iii) law firms, where we provide funding to a law firm directly rather than to their litigation clients, and (iv) insolvency practitioners.

Guided by the SASB reporting framework, the Company describes its approach to informing customers about products and services.

### *Our Approach to Informing Customers about Investment Products and Services*

We understand that legal assets have unique characteristics, and consequently, our customers require complete information to fully understand the associated risks. This is most important for our retail clients in class actions.

Since June 2020, class actions in Australia have been regulated as Managed Investment Schemes (MIS). By virtue of a MIS, the Product Disclosure Statement (PDS) serves as the primary source of information for customers in our class actions. This document provides them with detailed information on the class action, along with an explanation of their rights and entitlements should the case be successful. All information is described in layman's terms. The Company establishes a dedicated online portal for each class action to enable customers to view the PDS, see answers to FAQs and be kept up to date on the progress of the case. Customers can also contact our dedicated Client Liaison Team by phone or online form, for other queries.

As a result of the June 2022 Full Federal Court decision in *LCM Funding Pty Ltd v Stanwell Corporation Limited (2022) FCAFC 103*, and the draft *Corporations Amendment (Litigation Funding) Regulations 2022* which are open for comment until the end of September 2022, this regulatory environment is likely to change over FY23. Consequently, the way we disclose information to our clients is likely to change – although the substance is unlikely to materially change.

For non-class action clients, information is provided on the Omni Bridgeway website. These customers are also informed directly by conversations with our investment managers and via marketing brochures. Clients will also be advised about Omni Bridgeway's services and products by their legal advisers.

### *Staff Screening*

Our Australian and US employees are subject to initial employment screening, and no current employees operating from these locations have a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings. In all other locations, local privacy laws prevent us from conducting these background screening checks on new employees.

We confirm that no monetary losses were incurred during FY22 due to legal proceedings associated with a misleading PDS, or because of any other miscommunication to customers.

## Communication with Fund Investors

Omni Bridgeway engages regularly with the investors in its funds who are typically endowment funds, private equity and Family Offices. On average there would be less than six investors in each of the eight funds managed by Omni Bridgeway, noting that the Company is the sole investor in the recently launched Fund 8 which utilises debt financing. Quarterly, and for some earlier funds, monthly reporting is provided to investors with full portfolio details.

## Communication with Shareholders

Omni Bridgeway is an ASX-listed company and is committed to open and transparent communication with its shareholders and other stakeholders. We have a Continuous Disclosure Policy that is published on our website which details the procedures that are in place to ensure that financial markets are properly informed of matters which may have a material impact on the price at which securities are traded.

### *Engaging with shareholders*

In addition to the periodic disclosure of market sensitive announcements during the year, Omni Bridgeway also engages with the market at regular intervals to communicate its financial results and provide updates on the performance of its funds. These include:

- **Quarterly reporting:** Lodgment with ASX of a presentation updating the market on its Investment Portfolio Performance.
- **Half-year results reporting:** Lodgment of an Appendix 4D – Half Year Report, a presentation and ASX/Media Release with ASX followed by a market briefing via webcast and conference call.
- **Full-year reporting:** Lodgment of an Appendix 4E, presentation, ASX/Media Release and Annual Report (including Corporate Governance disclosures) followed by a market briefing via webcast and conference call.
- **Vintage investment reporting:** Information uploaded on the Omni Bridgeway website that provides financial metrics (committed capital, deployed capital, resolution amount, income and ROIC), segmented by the year of our initial investment.
- **Annual General Meeting** with shareholders which includes a review of the Company's strategy and performance as well as an update on recent activities. Both the Chairman's Address and Managing Director's presentation are lodged with the ASX.

Following results reporting in February and August, the CEO and CFO directly engage with shareholders, analysts, and institutional investors through a series of one-on-one and group, broker hosted, virtual or in person meetings (post-results roadshow). They also present to investors at broker hosted conferences during the year. In 2022, we plan to run an Investor Day in November at which investors will have the opportunity to hear from and ask questions of senior executives from different regions and specialist parts of the business. This will be a hybrid event, attended in person and via webcast, to enable domestic and offshore investors to participate.

### Online Communication

The investor section on a listed entity's website is frequently the first source of information for investors and forms a key component of our shareholder communication strategy. Omni Bridgeway maintains a dedicated investor section which provides access to all ASX Announcements and documents released to ASX as part of its communication with the market. This includes the Annual Report, ESG Report, all investor presentations as well as archived files of webcasts from the two earnings result briefings and the AGM, including the Q&A.

### Responsibility for Communication

Omni Bridgeway's primary authorised spokesperson for engagement with investors, shareholders and the media is the CEO and Managing Director. The CFO is also authorised to speak to analysts, shareholders, and potential investors to assist them in understanding or analysing the Company's financials. The Chair or nominated directors may also engage with shareholders in relation to matters of governance, strategy, ESG and performance.

The Company's Investor Relations Officer (IRO) is the primary point of contact for investors wishing to meet with the Company or seek access to information. Their contact details are provided on the bottom of ASX Releases and a dedicated form for investor relations enquiries can be found on the website's contact page.

The Company has a Disclosure Committee to assist the Board to comply with the Company's continuous disclosure obligations. The members of the Disclosure Committee are the Managing Director, the Global General Counsel and Company Secretary, and the CFO.

### Whistle-blower Policies

To satisfy the SASB Standard, we describe our Whistle-blower policies and procedures.

As part of the Company's commitment to maintaining high levels of conduct and ethical behaviour in its business operations, Omni Bridgeway has adopted a Whistleblower Policy that can be accessed at [https://omnibridgeway.com/docs/default-source/investors/corporate-governance/16-whistleblower-policy.pdf?sfvrsn=7da1a979\\_13](https://omnibridgeway.com/docs/default-source/investors/corporate-governance/16-whistleblower-policy.pdf?sfvrsn=7da1a979_13). The policy is designed to encourage employees and other stakeholders to disclose any 'reportable conduct', which includes misconduct, corporate corruption, bribery, and fraud, to appointed management.

All reports are treated on a confidential basis in accordance with the policy. We do not currently provide for a tipoff being managed by a third party. All employees receive initial and periodic training on the Whistleblower Policy. There have been no updates made to the Policy during FY22. We conduct reviews of the Whistleblower Policy and will consider further updates in the coming year.



The Company confirms that it has not incurred monetary losses during FY22, because of legal proceeding associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations.

### Anti-corruption

Corruption describes a situation where a benefit is offered or provided, with no legitimate purpose, and with the intention to influence a third-party to act in a particular way.

The Company has a zero-tolerance policy for bribery and corruption in any form and is committed to maintaining a high standard of integrity in its operations. At all times, the Company strives to operate in an ethical manner and in accordance with its Statement of Values and the Code of Conduct (the Code).

Our Anti-bribery and Corruption Policy recognises the risk of corruption and identifies several situations that may give rise to bribes or corrupt business dealings, including the making of facilitation payments, secret commissions, money laundering and political donations.

The Code is provided to all employees when joining the Company. Employees are required to make an attestation agreeing to compliance with the Code upon employment and annually thereafter. Compliance with the Code is a condition of employment with the Company. Failure to comply with the Code may result in one or more of the following: a formal warning; additional training; performance management; termination of employment or contractual arrangements; or civil or criminal prosecution.

Training is provided on the Anti-bribery and Corruption Policy to all employees when joining the Company and periodically thereafter. A copy of the Policy can be accessed at [https://omnibridgeway.com/docs/default-source/investors/corporate-governance/7-anti-bribery-policy.pdf?sfvrsn=ed9352b2\\_22](https://omnibridgeway.com/docs/default-source/investors/corporate-governance/7-anti-bribery-policy.pdf?sfvrsn=ed9352b2_22).

During the period July 2021 to June 2022, the Company confirms that it did not occur any losses due to legal proceeding associated with corruption, or bribery.



## Modern Slavery

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedoms. We support the importance of protecting human rights.

The Modern Slavery Act 2018 requires Australian businesses with an annual consolidated revenue of at least AUD\$100 million to produce a Modern Slavery Statement. By virtue of the Company's revenue falling below this threshold, a Modern Slavery Statement has not been prepared by Omni Bridgeway.

Notwithstanding this, the Company does consider modern slavery risks at the service provider level as part of our Third-Party Risk Management Policy.

## Grievance Policies

We place great importance on providing a workplace that is fair and equitable. Employees have the right not to be bullied, discriminated against, or harassed in the workplace. Our Complaints Resolution Process provides a mechanism for employees to raise a complaint without fear of retribution, and to enable corrective action to be taken where necessary.

## Risk Management Framework

The Board determines the Group's risk appetite and is responsible for overseeing and approving risk management strategies and policies and internal compliance and control. The responsibility for managing risk and assessing internal control effectiveness is delegated to management. Management is required by the Board to assess risk management and associated internal compliance and control procedures and report back on the efficiency and effectiveness of the Group's risk management.

The Group refers to the principles of AS/NZS ISO 31000:2018 and the latest edition of the ASX Corporate Governance Principles and Recommendations when developing its risk management processes and practices which include:

- Establishing the Company's goals and objectives and implementing and monitoring strategies and policies to achieve these goals and objectives.
- Continuously identifying and measuring risks that might impact upon the achievement of the Company's strategy and objectives and monitoring the environment for emerging factors and trends that affect these risks.
- Formulating risk management strategies to manage identified risks, and designing and implementing appropriate risk management policies and internal controls; and
- Monitoring the performance of, and continuously improving the effectiveness of, risk management systems and internal compliance and controls.

To this end, comprehensive practices are in place that are directed towards achieving the following objectives:

- Compliance with applicable laws and regulations;
- Reparation of reliable published financial information; and
- Implementation of risk transfer strategies where appropriate (e.g., insurance).

The Board oversees an annual assessment of the effectiveness of risk management and internal compliance and control, which has been undertaken in respect of FY22. This is reported in the 2022 Corporate Governance Statement, that can be accessed at <https://omnibridgeway.com/corporate-governance>.

## Certification and Board Approval

The Managing Director and the Chief Financial Officer have provided a written statement to the Board that:

- In their view, the Group's financial report is founded on a sound system of risk management and internal compliance and controls which implements the financial policies adopted by the Board; and
- the Group's risk management and internal compliance and control system is operating effectively in all material respects.

This ESG Statement is current as at 5 October 2022 and has been approved by the Board and as noted above reports against the fourth edition Recommendations. As permitted by ASX Listing Rule 4.10.3, the 2022 Annual Report references the Omni Bridgeway website to locate the ESG Statement.



# Annexure A

## Sustainability Accounting Standards Board (SASB)

The table below incorporates accounting standards from the SASB related Asset Management and Custody Activities. We believe this to be the most relevant ESG framework and it is a focus of the Company to improve our reporting against these metrics.

| Topic   | Accounting Metric   | SASB Code    | Page Number    |
|---|---|--------------|----------------|
| Transparent Information and Fair Advice for Customers   | (1) Number and (2) percentage of covered team members with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings                                       | FN-AC-270a.1 | 10             |
|   | Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product related information to new and returning customers  | FN-AC-270a.2 | 10             |
|   | Description of approach to informing customers about products and services  | FN-AC-270a.3 | 10             |
| Employee Diversity and Inclusion  | Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other team members   | FN-AC-330a.1 | 5-6            |
| Incorporation of Environmental, Social and Governance Factors in Investment Management and Advisory | Amount of assets under management, by asset class, that employ (1) integration of environmental, social and governance (ESG) issues, (2) sustainability themed investing, and (3) screening   | FN-AC-410a.1 | (see footnote) |
|   | Description of approach to incorporation of ESG factors in investment and/or wealth management processes and strategies   | FN-AC-410a.2 | 7              |
|   | Description of proxy voting and investee engagement policies and procedures   | FN-AC-410a.3 | 10             |
| Business Ethics   | Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations | FN-AC-510a.1 | 11             |
|   | Description of whistleblower policies and procedures  | FN-AC-510a.2 | 11             |

\*We have not reported on the EPV that considers ESG factors.

