



Insignia[®]
Financial

Modern Slavery Statement

Year ended 30 June 2024

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Message from our CEO

I'm pleased to present the Insignia Financial Modern Slavery Statement for FY24, which details the actions implemented throughout the year to assess and continue to mitigate the risk of modern slavery across our operations and supply chain.

Modern slavery remains a very real social issue in Australia. According to the Australian Institute of Health and Welfare (AIHW), in 2022-2023 the Australian Federal Police received more reports of modern slavery than in any other reporting period¹. Insignia Financial recognises its responsibility to protect the human rights of our people, those in our supply chain and our wider community.

Our Joint Modern Slavery Statement (**Statement**) for the period 1 July 2023 to 30 June 2024 (**FY24**) is made under section 14 of the *Modern Slavery Act 2018* (Cth)² on behalf of Insignia Financial Ltd and the reporting entities identified in the **Appendix**. This Statement outlines the actions taken by Insignia Financial Ltd, the reporting entities and the entities they own or control (collectively '**Insignia Financial**') to assess and address modern slavery risks in their operations and supply chains.

Throughout FY24 we have continued to focus on automating our supplier monitoring processes, to allow us to more efficiently identify businesses in our supply chain most at risk of exposure to modern slavery and other human rights issues. This automation allows our business to better focus resources on engaging directly with suppliers who we identify as being at higher risk of exposure to these issues, which we believe will deliver more meaningful outcomes.

The introduction of our Supplier Code of Conduct in FY24 has also set expectations regarding our suppliers' efforts to identify, address, and monitor modern slavery issues within their own supply chains.

The Insignia Financial Ltd Board of Directors, on behalf of itself and the other reporting entities covered by this Statement, has reviewed and approved this Statement. As CEO, I hereby authorise the Statement to be signed.



Scott Hartley
CEO, Insignia Financial Ltd

¹ www.aihw.gov.au/family-domestic-and-sexual-violence/types-of-violence/modern-slavery

² The Modern Slavery Act 2018 (Cth) defines modern slavery as including the following types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

Our structure, business operations and supply chain

Business structure and operations

Insignia Financial is a leading provider of quality financial advice, products and services with \$311.3 billion in funds under management and administration (FUMA) as at 30 June 2024.

Insignia Financial's ambition is to create financial wellbeing for every Australian, which is founded upon its purpose of 'understand me, look after me, secure my future' and its customer-led thinking, principles and ways of working which place customers at the centre of everything Insignia Financial does.

Tracing our origins back to 1846, today Insignia Financial is a leading Australian wealth manager. Our services cover a wide range of financial needs, including:

- **Financial Advice** Our employed advice businesses, Bridges and Shadforth, provide financial advice options along the spectrum – from guidance and coaching to episodic and holistic advice, based on client needs;
- **Superannuation** As one of the largest superannuation and pension providers in Australia, we offer a number of award-winning solutions used by many of Australia's largest employers and independent advisers;
- **Wrap Platform** We have built a strong and contemporary technology platform and remain committed to investing in technology and our services to support the changing needs of advisers and their clients; and
- **Asset Management** We offer access to a broad suite of investment capabilities across a range of multi-asset and single asset classes, designed to suit a wide range of investor needs and risk profiles. Our investment management is driven by a highly skilled team of investment professionals, operating out of Australia, the USA and UK.

Our people

As at 30 June 2024, Insignia Financial has 4,462 direct employees, with 4,459 based in Australia and 3 based in the US. By head count, 3,859 of our employees are permanent full-time workers, 152 are fixed-term/max-term employees, and 383 are permanent part-time. There are 68 employees who are casual workers.

Further information about Insignia Financial can be found at: insigniafinancial.com.au.

Corporate supply chain

In FY24, Insignia Financial engaged with 1,162 tier-one suppliers across its corporate operations to help deliver products and services to clients.

During this time, Insignia Financial spent around \$748 million across these suppliers, ranging from large multinational corporations to small businesses. More than 96% of this expenditure was allocated to businesses based in Australia.

Of the 1,162 suppliers, the majority were professional service based. The key supplier industry split to our business is as follows (rounded)³:

- professional, scientific and technical services (50%)
- financial and insurance services sector (33%)
- administration and support services (8%)
- rental, hire and real estate services (5%)
- transport, postal and warehousing (1%), and
- information, media and telecommunication (1%).

Of all corporate suppliers, 87.4% were based in Australia, which is slightly less than FY23. Of the non-Australian suppliers, they were distributed across USA and Canada (7.4%), Europe (2.7%) and Asia Pacific (2.5%).

Investment manager supply chain

Through its investment products offered by its Asset Management business, Insignia Financial outsources the management of investment capital within these products to various underlying investment managers which it appoints. These managers invest this capital into companies and other investment assets across a range of industries and geographic jurisdictions.

Insignia Financial considers these investment managers as tier one suppliers, due to the nature of this commercial arrangement. The Asset Management business, which appoints these managers, has implemented a separate modern slavery monitoring process to address the risk of modern slavery through its investments. This is due to the unique potential exposure of investing across a wide range of industries, asset classes and geographies. There is a separate investment manager (IM) modern slavery questionnaire which reflects the different exposure to modern slavery risks to our operational supply chain.

3 Australian and New Zealand Standard Industrial Classification (ANZSIC)

Risk of exposure to modern slavery

As an Australian-based financial services provider, Insignia Financial considers the direct risk of modern slavery within our operations to be low. However, we acknowledge an indirect risk through our supply chain and investments managed by our asset management business.

This risk is heightened when companies receiving capital from our investment managers are located in high-risk regions or operate in industries known for a higher prevalence of modern slavery.

Since most of our suppliers are based in Australia, where the inherent risk of modern slavery is lower, we also assess the risk within our corporate supply chain as low.

Examples of high-risk modern slavery sectors for Australia include⁴:



Services

(Excluding domestic work)



Manufacturing



Construction



Agriculture

(Excluding fishing)



Domestic work

Modern slavery risk assessment FY24

For FY24, a total of 1,162 corporate suppliers were identified, a small increase to the 1,140 corporate suppliers reported in FY23, but a large reduction from the 1,706 suppliers reported in FY22.

A total of 241 suppliers were excluded from further assessment. They were classified as:

- suppliers who received less than \$1,000 for the reporting period and were not in an industry assessed as high risk;
- sole traders (including individual contractors);
- government agencies;
- charities;
- internal accounts; or
- duplicate supplier profiles in our system.

Therefore, Insignia Financial had 921 in-scope corporate suppliers eligible for further assessment regarding modern slavery risks.

For the modern slavery assessment in FY24, Insignia Financial implemented its risk-based approach developed in FY23 to assess our corporate suppliers. This approach takes into account a supplier's geographic location, industry and our spend with a supplier.

⁴ Global Estimates of Modern Slavery: Forced Labour and Forced Marriage International Labour Organisation, Walk Free and International Organisation for Migration, Geneva, September 2022

There were 95 investment manager suppliers providing investment services to Insignia Financial's multi-manager and MySuper investment businesses for FY24, which was a reduction from 150 investment manager suppliers in FY23. This reduction reflects the ongoing consolidation of various investment management processes and products within the Asset Management business.

In FY23 the focus was to assess any investment managers that had either not responded to the Modern Slavery Questionnaire, or who had the lowest outcome scores in our risk-based assessment based on their responses.

Our goal in FY24 was to implement a significant uplift in our modern slavery regular due diligence for all investment manager suppliers as part of the broader approach to responsible investment. An enhanced comprehensive modern slavery questionnaire was also issued to investment manager suppliers used by Insignia Financial throughout the year.

Risk assessment results

Corporate supply chain

Following the application of our risk-based assessment approach, and in conjunction with external data suppliers using identity metrics, we assessed the inherent modern slavery risk of our corporate suppliers. This approach applies a risk rating to corporate suppliers based on industry, domicile country and total spend throughout the year.

Using this approach, the assessment results for inherent risks of modern slavery across the in-scope population of Insignia Financial's tier 1 corporate suppliers were:

- 1 supplier assessed as high risk;
- 187 suppliers assessed as medium risk; and
- 733 suppliers assessed as low risk.

Of the 921 in-scope tier 1 suppliers, the questionnaire response rate was over 66% which is an improvement on the response rate of 43% in FY23 and 14% response rate recorded in FY22. This increase reflects the automation of questionnaire issue and collection process for all new corporate suppliers, as well as an increased awareness of modern slavery assessment requirements across the market.

Following the additional assessment of our corporate suppliers, to include responses to the modern slavery questionnaire, we assessed 23 suppliers as high risk due to their responses, or due to them having a medium inherent risk and not having responded to the questionnaire. These suppliers have been added to the modern slavery watchlist for ongoing follow-up in FY25.

We identified that 290 corporate suppliers have not completed questionnaires, however these suppliers were assessed as having low or negligible inherent risk of modern slavery practices.

Of the responses received by corporate suppliers to the modern slavery questionnaire, no instances of modern slavery were identified (that is, suppliers who have had a record of any adverse association to modern slavery).

High risk suppliers will remain on the watchlist within the modern slavery risk register until we are satisfied that they are managing these risks appropriately. We will continue to leverage our procurement technology and work with internal business stakeholders to gather information from suppliers who have not yet completed the modern slavery questionnaire, or who have not demonstrated controls to manage modern slavery risks.

During FY24, the Insignia Financial Procurement Team engaged with the 26 supplier organisations who were registered on our watchlist following the FY23 corporate assessment process. The Procurement Team continued to work with various business owners to identify key contacts and seek further information relating to their management of modern slavery risks.

Following this engagement activity, 24 of these suppliers were removed from the watchlist. Seven of these are no longer suppliers, a further seven were re-classified as low risk due to further information provided and ten suppliers provided further information to satisfy our modern slavery assessment requirements.

At the time of this report, the remaining two FY23 watchlist suppliers and business stakeholders are fully engaged in discussion and co-operating to better understand their business practices. We will look to resolve this matter in FY25.

Investment manager assessment

There was considerable uplift in the scope of the modern slavery questionnaire for investment managers in FY24. Our strategic focus was to understand, assess and analyse three key questions and responses:

- Is the investment manager required to report under any existing legislation in response to modern slavery?
- Is there an organisational policy or process that governs how the investment manager assesses and manages modern slavery risks and impacts in its business operations?
- Does the investment manager's approach to responsible investment specifically include an assessment of modern slavery risks in the companies or assets in which it invests and its impact on people?

The response rate to the IM questionnaire was 99%, up from 72% in FY23, with 90% of investment managers meeting our baseline expectations in their approach to modern slavery. Our expectation is that all investment managers consider modern slavery risks in their business operations and within their supply chain.

Questionnaire responses showed that 36% of the investment managers are currently required to report on modern slavery under existing legislation, and that all of these investment managers have a modern slavery policy or assessment process. While 64% of investment managers are not required to report under any existing legislation, 88% of these managers have a policy or process that governs how they assess and manage modern slavery risks and impacts on business operations. Additionally, 87% of investment managers assess modern slavery risks within the companies and assets in which it invests.

Throughout FY25 we will engage with those investment managers who had no obligation to report under any existing legislation, no policy or process to address modern slavery, and did not assess modern slavery risks within their supply chain, to help assist their approach to modern slavery risk assessment.

Our actions to address modern slavery risks

Operational governance and employee relations

Insignia Financial is an Australian-based financial services organization with a workforce largely consisting of directly employed professionals. Our employees' terms and conditions are established in employment contracts that align with relevant employment laws.

The Insignia Financial Code of Conduct (the Code) outlines the values and standards of behaviour expected of all employees, supporting our client-focused mission. The Code, alongside complementary corporate policies, promotes ethical practices and is designed to support the selection of only reputable and professional suppliers and service providers.

Additionally, Insignia Financial has implemented a Whistleblowing Program to provide a secure and confidential avenue for reporting any concerns about business practices. This program ensures that all reported matters are reviewed and/or investigated impartially, with appropriate corrective action taken as necessary.

Frameworks and policies

Addressing modern slavery risk relies on us building strong risk frameworks across our organisation to identify and address these issues. We apply a 'three lines of accountability' model to the identification and management of these risks.

‘Three lines of accountability’ model

Insignia Financial adopts the ‘three lines of accountability’ model to govern risk management activities across the organisation. The model is represented as follows:

1 First line Business management	Business units are accountable for identifying, managing and owning the risks inherent in the products, services, activities, processes and systems they are responsible for.
2 Second line Risk management function	<p>The independent Risk Management function, led by the Chief Risk Officer, is responsible for the design, maintenance and ongoing development of the Risk Management Framework.</p> <p>Risk Management supports the first line in its risk management responsibilities by providing independent challenge and oversight, as well as specialist risk advice. This includes assessing the use and adequacy of frameworks, systems, processes and behaviours, to form a view of how well risk and compliance is managed across Insignia Financial.</p>
3 Third line Independent assurance	Internal audit provide a third line of independence and oversight of the first and second-line activities. This oversight may include other independent reviews commissioned by the Board.

The key Insignia Financial policies and statements related to addressing these modern slavery risks include:

- Modern Slavery Policy (**MS Policy**)
- Supplier Code of Conduct
- Procurement Policy
- Whistleblower Policy
- Anti-Bribery and Anti-Corruption Policy
- Diversity, Equity and Belonging Policy, and
- Responsible investment statements and policies.

Modern Slavery Policy

Insignia Financial’s MS Policy defines our approach to minimizing the risk of modern slavery within our operations and supply chain. Compliance with the MS Policy is mandatory for all employees, serving as a key accountability measure.

In FY24, the MS Policy was updated to include the new risk assessment management framework, as well as put greater accountability on internal business owners to assist with supplier engagement on these risks.

The new policy was approved by the Insignia Financial Policy Committee in September 2023 and published in October 2023.

Supplier Code of Conduct

In FY24, Insignia Financial introduced its updated Supplier Code of Conduct, which establishes the expected standards of behaviour for all suppliers in alignment with the values and principles upheld by Insignia Financial.

The Supplier Code of Conduct states specific obligations in relation to our suppliers’ management of modern slavery risks.

Suppliers must:

- Not engage in modern slavery practices in their operations or supply chains.
- Take reasonable steps to identify, assess and address any risks or occurrences of modern slavery in their supply chains.

The Supplier Code of Conduct is publicly available on the Insignia Financial corporate website.

Responsible investment statements and policies

Responsible investment describes the approach in which we apply Environmental, Social and Governance (ESG) principles to our investment and superannuation business.

The Insignia Financial Responsible Investment Policy Statements define the role that responsible investment considerations play in the assessment, selection and monitoring of externally appointed investment managers. It also outlines the framework for identifying and managing ESG risks and opportunities across managed investment schemes.

These statements outline several ESG risks considered as part of this framework, including:

- human capital management
- labour standards
- modern slavery
- diversity, equity and belonging, and
- workplace health and safety.

As part of our responsible investment framework, the above risk considerations are applied in assessing new fund manager suppliers and form part of the ongoing assessment of existing fund managers.

Employee awareness and training

Insignia Financial equips employees with training and resources to help them identify, address, and report issues related to modern slavery. Each year, all employees are required to complete a general awareness training on modern slavery. This training includes guidance on our Modern Slavery Policy and outlines steps to take if any suspected or actual case of modern slavery is identified. In FY24, our employees achieved a 100% completion rate for this module.

We also provide a dedicated intranet site accessible to all employees, offering additional information on modern slavery. The site details our obligations, links to our Modern Slavery Statement, Modern Slavery Policy, and relevant procedures. Employees are encouraged to report any potential modern slavery concerns via our dedicated mailbox.

The Insignia Financial Ltd Board (the Board)

The Board acknowledges that effective risk management is crucial for strong governance and fundamental to Insignia Financial's ongoing growth and success. The Board holds ultimate responsibility for overseeing our risk management framework.

The Board has established a Group Risk & Compliance Committee (GRCC) whose primary objective is to monitor and receive assurances that:

- an appropriate and effective risk management framework is in place for identifying, assessing, mitigating and monitoring material risks
- appropriate and effective compliance policies, procedures and frameworks are in place for identifying, monitoring and managing relevant obligations
- operations are conducted in accordance with the abovenamed policies, procedures and frameworks
- management devotes appropriate and proper attention to compliance and risk management issues.

In FY24, quarterly ESG Risk reports were tabled to the GRCC, which included updates on modern slavery risks and mitigation actions to appropriately manage these risks.

Modern Slavery Working Group

During FY24, Insignia Financial's cross-functional Modern Slavery Working Group convened to agree actions to improve modern slavery monitoring towards the five-year Maturity Plan (page 11) and assist with the development of this Modern Slavery Statement. The Modern Slavery Working Group includes representatives from our legal, risk and procurement functions.

Corporate supply chain management

The implementation of a new digital procurement system in FY23 has greatly improved the monitoring of modern slavery risks across Insignia Financial's supply chain. The ongoing automation of this system to issue and collect modern slavery questionnaires and apply an inherent risk rating to our suppliers has enabled people resources to better engage with our supply chain.

This has assisted in an improved questionnaire response rate from 14% in FY22 to 66% in FY24, as well as greater engagement with suppliers registered on the watchlist.

The engagement of internal business stakeholders managing supplier relationships has also improved following the release of the updated Modern Slavery Policy, leading to a greater ability to gather better modern slavery information. This has resulted in the business better addressing modern slavery monitoring issues with 24 of the 26 suppliers on the FY23 watchlist being removed throughout FY24.

Ensuring supplier data is accurate and up-to-date is critical in enabling Insignia Financial to monitor and address modern slavery risk across its supply chain. Ongoing data consolidation and cleansing is part of the Procurement Team's ongoing responsibilities.

Through FY24 the business continued to build enhanced due diligence processes within its digital procurement system. Work has commenced to improve the modern slavery questions within this automated due diligence process, to create further data accuracy and efficiencies in supplier responses for monitoring purposes.

Investment manager supply chain management

In June 2024, the Insignia Financial Asset Management business implemented a new due diligence, risk, and compliance platform. The platform is an internationally recognised automated database, used to evaluate operational due diligence within organisations and their supply chains.

As part of our strategy to continue to uplift our approach to responsible investment, all future modern slavery assessments will be managed via this platform. Responses will be automatically scored based on the quality of responses from investment managers.

This new process will allow us to better identify trends across asset classes, industries, and geographies, to identify areas that may require further engagement across the business.

Improvement planning

Insignia Financial continues to take a risk-based maturity approach to managing and assessing modern slavery risks in our supply chain. This approach has led to much greater engagement with our supply chain, enhancing our ability to monitor and detect any potential modern slavery risks.

Our five-year Maturity Plan, which commenced in FY20 (Year 1), has guided our efforts in improving our processes, systems and business awareness in addressing modern slavery risks.

Maturity plan

The aim of the maturity plan is to ensure that Insignia Financial continually improves its ability to meet its commitments to reduce the risks of modern slavery practices by identifying and taking action where required. It focuses on developing better supplier relationships and creating awareness and accountability as well as ensuring a mature and adaptive compliance culture within the organisation.

The maturity plan sets out a 5-year timeframe to achieve best practice in identifying and addressing modern slavery issues.





Our Review of the effectiveness of actions

Progress against the maturity plan

Our five-year Maturity Plan, which commenced in FY20 (Year 1) and was updated in 2021, has helped us measure our progress against key milestones to address the risk of modern slavery practices across the three areas of **People, Process and Systems**.

Working towards this plan has provided Insignia Financial with a clear roadmap, resulting in improved systems, processes, governance and much greater employee awareness of modern slavery risks.

As outlined in the diagram below, Year 5 of the plan corresponds to FY24.

					
	Commencement	Improvement	Growth	Enhancement	Best Practice
	Year 1	Year 2	Year 3	Year 4	Year 5
People	Low understanding of Modern Slavery (MS) Lack of buy-in from internal business units Supplier relationships not defined	General MS awareness (training intranet) General MS training in place Suppliers consolidated	Top-down awareness/communications Targeted MS training Insignia Financial suppliers consolidated Supplier remediation conversations	Strong MS awareness Consolidation of MS in the boarder ESG program Insignia Financial supplier pre-qualified list Strong supplier relationships/ remediation programs	External stakeholder awareness (e.g. investors, licensees) Staff awareness MS in the broader ESG program Strong compliance culture
Process	No policies in place De-scoped suppliers Supplier risk journey design	MS policy in place Supplier risk maturity approach adopted Supplier risk benchmarking Suppliers de-scoped	Development of broader ESG policies MS framework in place with measurable KPIs Supplier risk review ongoing Supplier risk improvements	Internal assurance program in place External assurance of suppliers (via pre-qual system) enabling insights into next level suppliers Board / Executive risk reporting	Process / programs are part of BAU Internal / external assurance program in place Public reporting (ESG) Executive / Board reporting
Systems	Data quality issues No systems to capture data Mapping via spreadsheets	Data quality issues Procurement system improvement Supplier system underway (Zycus)	Data quality consolidation Procurement system (Zycus) roll-out Supplier on-boarding / pre-qualification design	Supplier risk identification embedded	High confidence in supplier data and information Automated supplier risk monitoring

In FY24, Insignia Financial made further progress towards achieving our stated objectives in Year 5 of our Maturity Plan, these include:

People

- 100% completion for the modern slavery general awareness e-learning module. This includes all client-facing employees and employees dealing with suppliers across Insignia Financial.
- The updated Modern Slavery Policy for employees was published in October 2023, outlining our risk assessment process and enhancing obligations on business stakeholders who own supplier relationships.
- Modern slavery risks have been incorporated into the Insignia Financial Enterprise Risk Management framework with associated risk controls and owners. This includes internal assurance activities to validate that controls are operationally effective.
- The ongoing uplift in modern slavery monitoring processes has been incorporated into the FY26 sustainability strategy, approved by the Insignia Financial Board in September 2024.
- Key Performance Indicators (KPIs) relating to ongoing monitoring of modern slavery risks have been incorporated into annual goals for the Head of ESG, with the Supplier Management and Procurement Teams having additional KPIs included in their FY25 goals.

Process

- Modern slavery monitoring for corporate suppliers has been incorporated into business processes for Insignia Financial through the automation of supplier risk assessments and validation process (external assurance), requirement for new supplier questionnaires and education of business stakeholder obligations through policy awareness.
- Modern Slavery monitoring for investment management suppliers has been incorporated into business processes through integration into asset management due diligence process.
- The Insignia Financial Supplier Code of Conduct was introduced, establishing expected standards in relation to suppliers' management of modern slavery issues.
- The publicly available, annual Insignia Financial Sustainability Report includes information on the assessment of modern slavery risks.
- Modern slavery risks continue to be reported to the Insignia Financial Group Risk Compliance Committee (GRCC) for awareness and monitoring.

Systems

- Following the introduction of our new procurement system, work has commenced to upgrade automated supplier modern slavery questionnaire process in order to further improve response rates and information flow to monitor modern slavery issues.
- The ongoing consolidation and cleansing of supplier data within the system has been made part of the procurement team's ongoing responsibilities.
- Initial supplier risk assessment has been built into our digital procurement system, enabling Insignia Financial to better focus resources on supplier engagement and management of modern slavery risks.

Further Actions

While key items relating to the 5-year Maturity Plan have been met, Insignia Financial remains committed to further uplift its capability in monitoring and addressing modern slavery risks. This will be achieved through the ongoing education of its people, as well as improvement in processes, accountabilities and systems.

In FY25, Insignia Financial will:

- Engage with all suppliers added to the modern slavery watchlist as a result of the FY24 supplier risk assessment process.
- Seek an uplift in automated questionnaires in our digital procurement system to generate further efficiency and accuracy of responses.
- Automate the monitoring of modern slavery within the new investment manager due diligence system, which will streamline the issuing of questionnaires and the assessment of responses.
- Incorporate modern slavery KPIs for key people in the Supplier Management and Procurement Teams.

We actively engage with industry bodies such as the Financial Services Council (FSC) and the Responsible Investment Association Australasia (RIAA), which helps shape our approach to strengthening our response to modern slavery risks in our corporate supply chain and investment portfolios.

Our consultation process

This Modern Slavery Statement has been approved by the Board of Insignia Financial Ltd.

Throughout FY24, the Insignia Financial Group Risk Compliance Committee were provided with progress updates relating to the uplift in monitoring of modern slavery risks across the supply chain.

In preparing the FY24 Modern Slavery Statement, Insignia Financial Ltd consulted with each of the reporting entities covered by this Modern Slavery Statement and with applicable entities they own or control. The respective Boards of the applicable entities covered in this statement were provided with an update on progress towards meeting the Insignia Financial modern slavery Maturity Plan, and the reporting entities were asked to approve their inclusion in this Statement.

In the preparation of this Statement, input was also received from the cross-functional Modern Slavery Working Group, which includes representatives from our corporate legal, risk and procurement functions.

Other information

Although COVID-19 lockdowns concluded during FY22, Insignia Financial recognises the virus's ongoing impact on global supply chains. While no significant effects were identified during this assessment period, there may still be latent impacts yet to emerge.

Insignia Financial continues to monitor and engage with suppliers regarding any operational changes resulting from COVID-19.

Appendix – Reporting Entities

This is a joint Modern Slavery Statement under section 14 of the Modern Slavery Act 2018 (Cth). It covers the following reporting entities:

Companies

- Insignia Financial Ltd (ABN 49 100 103 722)
- Consultum Financial Advisers Pty Ltd (ABN 65 006 373 995)[#]
- IOOF Investment Management Limited (ABN 53 006 695 021)
- NULIS Nominees (Australia) Ltd (ABN 80 008 515 633)
- OnePath Custodians Pty Ltd (ABN 12 008 508 496)
- IOOF Investment Services Ltd (ABN 80 007 350 405)
- MLC Investments Ltd (ABN 30 002 641 661)
- MLC Wealth Limited (ABN 97 071 514 264)
- Australian Wealth Management Limited (ABN 53 111 116 511)
- Rhombus Advisory Pty Ltd (ABN 43 672 201 517)[#]

Super funds

- MLC Super Fund (ABN 70 732 426 024)
- MLC Superannuation Fund (ABN 40 022 701 955)^{*}
- MLC Pooled Superannuation Trust (ABN 89 787 168 280)^{*}
- Oasis Superannuation Master Trust (ABN 81 154 851 339)
- Retirement Portfolio Service (ABN 61 808 189 263)
- IOOF Portfolio Service Superannuation Fund (ABN 70 815 369 818)
- AvWrap Retirement Service Superannuation Fund (ABN 82 004 832 237)

Trusts

- OptiMix Wholesale Global Emerging Markets Share Trust (ARSN 120 609 216)
- OneAnswer - OnePath International Shares Index Trust (ARSN 101 400 757)
- OptiMix Wholesale Balanced Trust (ARSN 091 108 628)
- OneAnswer - OnePath Australian Shares Index Trust (ARSN 104 467 469)
- OneAnswer - OnePath Balanced Index Trust (ARSN 142 352 592)
- Strategic Australian Equity Fund (ARSN 133 312 820)
- Strategic International Equity Fund (ARSN 133 308 219)
- MLC MultiSeries 70 (ARSN 118 190 613)
- MLC MultiSeries 50 (ARSN 614 698 314)
- Multi Series Wholesale Australian Equities Trust (ARSN 614 051 428)
- Multi Series Wholesale International Equities Trust (ARSN 614 051 384)

[#] Rhombus Advisory Pty Ltd and Consultum Financial Advisers Pty Ltd (Rhombus Advisory) separated from Insignia Financial on 1 July 2024.

^{*}These superannuation funds were wound-up in March 2024.

- MultiMix Wholesale Australian Shares Trust (ARSN 093 527 345)
- MultiMix Wholesale International Shares Trust (ARSN 093 528 511)
- MLC Cash Management Trust (ARSN 105 788 501)
- IOOF Income Trust (ARSN 105 788 387)
- IOOF Balanced Investor Trust (ARSN 165 464 228)
- MLC MultiActive Balanced (ARSN 130 097 059)
- MLC MasterKey Unit Trust Growth Portfolio (ARSN 087 944 438)
- MLC MasterKey Unit Trust Balanced Portfolio (ARSN 087 944 625)
- MLC MasterKey Unit Trust Conservative Growth Portfolio (ARSN 097 221 077)
- MLC MasterKey Unit Trust IncomeBuilder (ARSN 087 944 287)
- WM Sector - Global Equities (Unhedged) Trust (ARSN 167 805 012)
- MLC Horizon 7 Trust (ARSN 167 804 668)
- Horizon 4 Balanced Portfolio (ARSN 087 446 375)
- Passive Australian Share Trust (ARSN 136 061 697)
- Passive Global Share Trust (ARSN 136 061 357)
- Diversified Australian Share Trust (ARSN 087 780 532)
- Diversified Global Share Trust (ARSN 087 779 173)
- Diversified Global Share Trust with Currency Hedged (ARSN 087 779 520)
- Integrated Separately Managed Account (ARSN 138 086 889)
- WM Pool - Equities Trust No. 34 (Unregistered)
- WM Pool - Global Equities Trust No. 6 (Unregistered)
- WM Pool - Equities Trust No. 74 (Unregistered)
- WM Pool - Equities Trust No. 75 (Unregistered)
- WM Sector - Australian Equities Trust (Unregistered)
- WM Sector - Diversified Debt (All) Trust (Unregistered)
- WM Sector - Diversified Debt (Short) Trust (Unregistered)
- WM Sector - Global Equities (Hedged) Trust (Unregistered)
- WM Pool - Australian Equities No.2 (Unregistered)
- Smart Choice Wholesale Alternatives Growth Trust (Unregistered)
- OnePath Australian Shares Index Pool (Unregistered)
- OnePath Global Shares – Large Cap (Hedged) Index Pool (Unregistered)
- OnePath Global Shares – Large Cap (Unhedged) Index Pool (Unregistered)

