

Modern Slavery Statement for the year ended 30 June 2024

Introduction

This modern slavery statement (Statement) is prepared and issued by NESS Super Pty Limited ABN 28 003 156 812 AFSL 238945 (**the Trustee**) for NESS Super ABN 72 229 227 691 (**the Fund**), for the period from 1 July 2023 to 30 June 2024. The Trustee has no controlled entities.

This Statement is published in accordance with the *Modern Slavery Act 2018 (Cth) (Act)*. It sets out our efforts to assess and address the modern slavery risks in our operations and supply chains.

Who we are

The Fund was established in 1987 as a superannuation fund dedicated to the needs of employers and their employees in the electrotechnology industry. It is jointly sponsored by the Electrical Trades Union New South Wales Branch (ETU) and the National Electrical and Communications Association (NECA). The Fund is a complying superannuation fund within the meaning of the Superannuation Industry (Supervision) Act 1993.

The Trustee is solely responsible for the management and control of the Fund, ensuring it operates in accordance with the NESS Super Trust Deed and superannuation law. The Trustee holds an Australian Financial Service Licence (AFSL) and is the Registrable Superannuation Entity (RSE) licensee for NESS Super and manages all aspects of the Fund's operations, including its investments.

What we do

The Fund is a profit to members, industry superannuation fund established to provide comprehensive super and pension solutions and services primarily to the electrotechnology industry, but is open to trades and all eligible Australians. The Fund provides members and beneficiaries with retirement benefits and cost-effective Death, Total and Permanent Disablement (TPD), Terminal Illness, and Income Protection insurance. All profits are returned to members, we do not pay commissions and no dividends are paid to shareholders. The Trustee manages over \$1.2 billion in assets under management for over 12,800 members.

The Trustee is governed by a Board of Directors which includes two directors nominated by the ETU, two directors nominated by NECA and two independent directors. To fulfill certain obligations and strengthen its overall governance framework, the Board has established an Audit, Risk and Compliance Committee (ARCC), Investment Committee, Insurance Committee, Remuneration Committee and a Mergers and Acquisitions Committees to act on its behalf.

The day-to-day management of the Trustee's operations is delegated to the Chief Executive Officer (CEO). There are approximately 14 employees, and they provide the support functions which includes member and employer services, secretariat, investment operations, and risk & compliance.

Our supply chains

Many of the business operations of the Trustee have been outsourced to external service providers. Key among these are our administrator, custodian, internal audit and investment consultant. Other professional services provided include accounting, legal, external audit and other services to assist with our obligations.

For a list of our material service providers please visit our website nesssuper.com.au.

Our investments

For the year ended 30 June 2024, the Trustee has chosen to have its assets managed through an Investment Consulting relationship with Cambridge Associates LLC (CA). CA advises the Investment Committee on the selection of investment managers and their mandates.

CA incorporates ethical, social and governance (ESG) factors into their investment selection processes. The integration of ESG requires that the impact of any ESG issues on the value of an investment is included in the evaluation process and an understanding of the long-term sustainability of the relevant investment.

The current exclusions that may apply to direct equity holdings include the exclusion of investing in securities where the corresponding companies:

- produce components that are key and dedicated to the production of anti-personnel mines and / or cluster munitions;
- manufacture tobacco products; or
- are involved, either directly or indirectly, in the production of the core nuclear weapon system, or components/services of the core nuclear weapon system, that are considered tailor-made and essential for the lethal use of the weapon.

The Trustee recognises that it may be unable to exclude specific individual holdings when investing in commingled funds, such as index-tracking funds. The Trustee will continue to work with the Investment Consultant to both incorporate responsible investing and consider modern slavery risks throughout its investment process.

Our risk process and assessment

Risk in Operations

There have been no modern slavery risks in operations identified for the 2023/24 financial year.

The Trustee operates in a heavily regulated Australian financial services environment and has frameworks and procedures in place in relation to employment practices, employees' conduct, governance and risk management, whistleblowing and due diligence. Our employees are primarily skilled white-collar professionals and the risk of modern slavery in our operations has therefore been assessed as low.

When selecting a service provider, the Trustee will consider any Modern Slavery risks and ensure that the provider is managing the risk appropriately. The Trustee reviews the service provider's Modern Slavery Statement where one exists or any other statement on how they will manage Modern Slavery risk.

Risk in our Supply Chain

There were minimal modern slavery risks in our supply chain during the 2023/24 financial year

The Trustee's supply chains generally include those related to professional services, corporate and operational procurement such as investment consulting, custody services, administration services, banking, legal and tax advisors, information technology and stationery. Generally, the risk in our supply chain is low since all suppliers of material services are based in Australia and relate to high-skilled and professional industries with low labour-related risks.

We confirm that all our material services suppliers either have assessed or are in the process of assessing modern slavery risks and conduct due diligence that considers modern slavery risk management in investee entities' operations and supply chains.

The Trustee also has a robust risk management framework in place. If any modern slavery risks are identified they will be incorporated into the risk assessment process and managed accordingly.

When selecting a service provider, the Trustee will consider any Modern Slavery risks and ensure that the provider is managing the risk appropriately. The Trustee reviews the service provider's Modern Slavery Statement where one exists or any other statement on how they will manage Modern Slavery risk.

During the 2023/24 financial year the trustee purchased promotional material onshore and offshore. In all cases a review of providers was conducted to ensure their practices reduced the risks of modern slavery.

Measuring effectiveness and remediation

We aim to continually improve our programme of work on modern slavery and we are planning the following activities in the year ending 30 June 2024:

Outcomes	Measures
Strengthening the Modern Slavery framework	<ul style="list-style-type: none"> The Governance Policy which includes the Code of Conduct reflects the modern slavery requirements. This policy was last reviewed and updated in June 2024. The Risk Management Strategy reflects the modern slavery requirements. This document was last reviewed and updated in December 2023. The Outsourcing Policy reflects modern slavery requirements. This policy was last reviewed and updated in June 2024.
Raise awareness of Modern Slavery	<ul style="list-style-type: none"> Each year each Director and employee of NESS Super undertakes mandatory Modern Slavery awareness training Modern Slavery training was last conducted in November 2023. The next Modern Slavery training is scheduled in November 2024.
Ongoing development of the supplier due diligence program	<ul style="list-style-type: none"> The Outsourcing Policy include our Modern Slavery obligations. This policy was last reviewed and updated in June 2024.
Continuous monitoring and assessment of Modern Slavery Risks	<ul style="list-style-type: none"> NESS Super continually monitors emerging risks. NESS Super continually monitor and control risks in accordance with a Board approved Risk Management Strategy and Risk Appetite Statement. Risk based oversight of any suppliers identified as likely to have a risk exposure to modern slavery

This statement was approved by the Board of NESS Super Pty Ltd, as Trustee of NESS Super (the Fund), at its meeting on 19 September 2024.



Paul Lahiff

Chair, NESS Super Pty Ltd