



HOSTPLUS MODERN SLAVERY STATEMENT

For the financial year
ending 30 June 2025



THAT'S A PLUS+



As a superannuation fund with offices in every Australian state and major territory, we recognise Aboriginal and Torres Strait Islander peoples as this country's Traditional Owners. They have maintained the lands on which we live and work, and the waterways, for thousands of years.

We pay our respects to Elders past and present and extend this acknowledgement to all Aboriginal and Torres Strait Islander peoples today.

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CEO AND CHAIR MESSAGE

On behalf of the Hostplus Board and Executive, we are proud to present our Modern Slavery Statement for the financial year ending 30 June 2025.

This document outlines the tangible actions we are taking to identify, assess, and address modern slavery risks across our operations, supply chains, and investments – reflecting our ongoing commitment to meaningful and measurable progress.

At Hostplus, we recognise that modern slavery is a violation of human rights encompassing a range of illegal practices. We condemn all forms of modern slavery and are dedicated to playing our part in combating this global issue.

Over the past 12 months, we have taken meaningful steps to further strengthen and formalise our approach to addressing modern slavery risks. Key actions include:

- Strengthening governance through the development of a Responsible, Accountable, Consulted, and Informed (RACI) framework and a comprehensive modern slavery response framework.
- Enhancing due diligence by introducing an annual self-assessment process for incumbent investment managers.
- Building organisational capability through the rollout of enterprise-wide training to raise awareness and accountability.
- Embedding accountability by implementing a framework to measure the effectiveness of our actions and guide continuous improvement.

Looking ahead, we will continue to build on these actions by further operationalising our governance and reporting frameworks, expanding the roll-out of modern slavery training, and deepening our engagement with stakeholders.

As the actions outlined in this statement demonstrate, Hostplus is dedicated to contributing to the global effort to eliminate modern slavery. We remain committed to taking incremental, meaningful action and extend our sincere thanks to our team, partners, and stakeholders for their continued support in this critical endeavour.

This statement was approved by the Board of Host-Plus Pty. Limited ABN 79 008 634 704, AFSL 244392 in its capacity as trustee of the Hostplus Superannuation Fund ABN 68 657 495 890 (the Fund) and in its capacity as trustee of the Hostplus Pooled Superannuation Trust ABN 13 140 019 340 (PST) in December 2025.



Damien Frawley
Chair of the Board



David Elia
Chief Executive Officer



IDENTIFY THE REPORTING ENTITY

(Mandatory criteria – s.16(1) (a) and (f))

This is a joint Modern Slavery Statement made pursuant to s.14(1) of the Modern Slavery Act 2018 (Cth) (the Act) for the financial year ending 30 June 2025.

The reporting entities covered by this statement are:

- Hostplus Superannuation Fund (the Fund)
- Hostplus Pooled Superannuation Trust (the PST)
- Host-Plus Pty. Limited (the Trustee), collectively referred to as 'Hostplus'.

The above individual entities are specifically referenced where such differentiation is appropriate throughout this statement to provide more accurate information in relation to a reporting requirement.

All numbers, statistics and facts described in this statement are as at 30 June 2025, unless otherwise stated.

The Hostplus Board of Directors (Board) is ultimately accountable for our approach to identify, assess and mitigate modern slavery risks within our operations and supply chains. The Trustee has consulted with senior management representatives from both the PST and the Fund in preparing this statement.

STRUCTURE, OPERATIONS AND SUPPLY CHAINS



(Mandatory criteria – s.16(1)(b) and (f))

Corporate structure

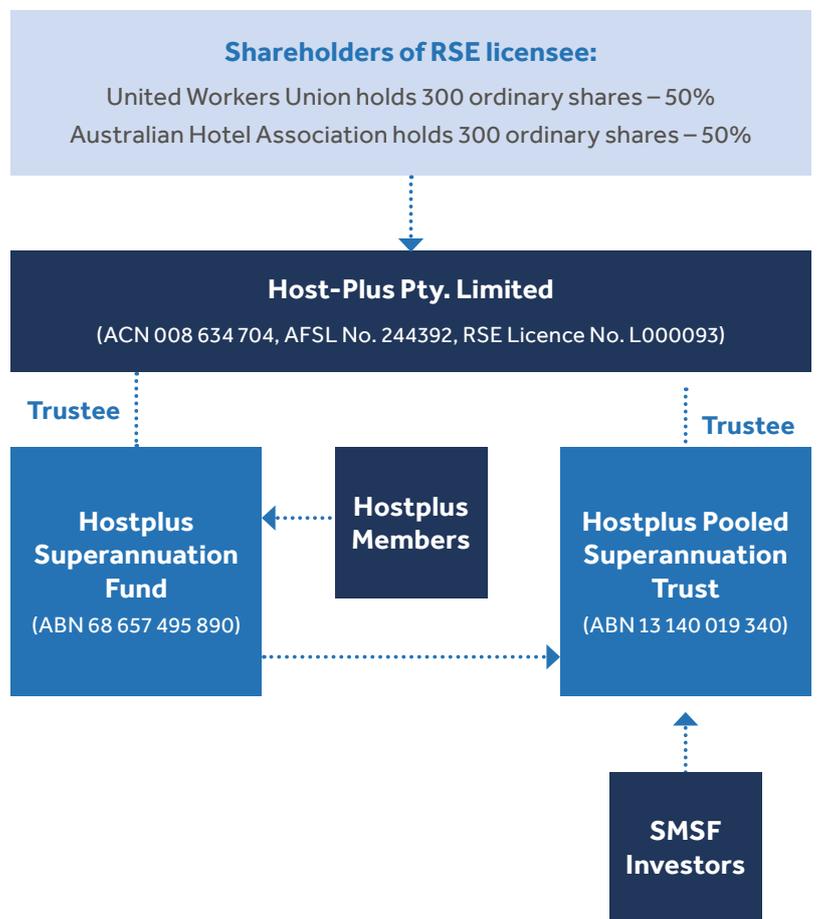
The Trustee is the corporate trustee of the Fund and the PST.

The Fund is a registrable superannuation entity regulated by the Australian Prudential Regulation Authority (APRA) under the *Superannuation Industry (Supervision) Act 1993* (Cth).

The PST is a type of unit trust regulated by APRA. The Trustee invests the assets of the Fund through the PST. The PST is also used to facilitate the investment of assets that can include other superannuation funds, other PSTs, and other specified entities (e.g., self-managed superannuation funds).

The Fund and PST are entities that the Trustee 'owns or controls' for the purpose of the Act. Each of these owned / controlled entities are fully covered by the operational control, workforces, supply chains and executive decision-making processes of one or more of the reporting entities listed above and described in this statement. Through this corporate and operational integration, the Trustee has consulted with its owned / controlled entities, both in relation to the preparation of this statement, and in the development and implementation of our overall modern slavery response.

The following diagram provides an overview of Hostplus' general structure, including the Trustee, Fund and PST:



The Fund and the PST are governed and managed by our Trustee Board. The Board represents its members in accordance with the relevant trust deed of the Fund and the PST and superannuation law.





Operations

Hostplus is one of Australia's largest industry funds with 1,874,747 members and 320,512 contributing employers as at 30 June 2025.

The Fund was established in 1988 and is a profit-to-member superannuation fund. Over the last three decades, we have become the lifetime fund of choice for Australians from different backgrounds and industries. While our roots lie in hospitality, tourism, recreation and sport, our increasing member diversity shows we're a fund for everyone.

The Fund offers members the following core products and services:

- various superannuation products
- account administration services
- financial advice
- insurance (income protection, death and total and permanent disablement cover)
- member education services
- investment options to cater for various risk appetites.

The PST combines money from eligible super funds to invest in quality assets domestically and globally. The Trustee and selected managers handle these investments for Hostplus and other superannuation funds.

Hostplus offices are located Australia-wide, with the head office located in Melbourne.

The Hostplus team has continued to grow, with employee numbers increasing to 365 during the reporting period. Hostplus' business operations are solely conducted in Australia. All Hostplus employees are directly employed under an enterprise agreement and written employment contracts.



Supply chains

The Trustee has primary responsibility for the procurement of goods and services for the functioning of Hostplus' day-to-day operations.

Key operational functions that are outsourced to specialist third parties include:

- administration and member services for all Hostplus products
- insurance arrangements
- custodian services
- investment management
- proxy voting
- information-technology-managed services, including information security
- internal and external audit.

The key industry categories with which Hostplus engages in its first-tier (direct) supplier relationships include financial institutions, asset consultants, intermediary distributors, information technology vendors, and professional services in marketing, digital, consulting, property management, and legal services.

The Trustee procured goods or services from 687 individual suppliers throughout the reporting period. The overwhelming majority of these suppliers are based in Australia.

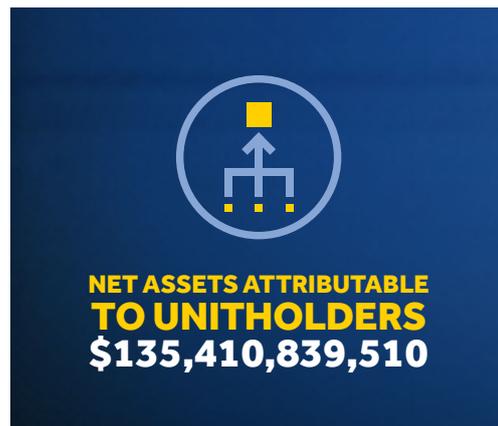
Investments

Hostplus' net assets attributable to unitholders was \$135,410,839,510 as at 30 June 2025.

Hostplus invests for the long term across a broad range of asset classes such as listed shares, property, infrastructure, credit, alternatives, and private equity (including venture capital).

To implement its investment strategy, Hostplus continues to rely on a range of experienced, specialist investment managers who invest on the Hostplus' behalf. Using external investment fund managers allows Hostplus to take advantage of their skill sets and deep access to investment opportunities to maximise future returns. In the reporting period, Hostplus, via the PST, engaged and/or retained the services of a total of 107 external investment managers.

Investment managers are appointed by the Board after thorough due diligence is undertaken, and with the endorsement of the Hostplus' investment adviser (JANA Investment Advisers Pty Ltd). Once appointed, investment managers and the underlying investments are monitored on an ongoing basis.



RISKS OF MODERN SLAVERY PRACTICES IN OPERATIONS, SUPPLY CHAINS AND INVESTMENTS



(Mandatory criteria - s.16(1)(c) and (d))

During the reporting period, Hostplus continued to take active steps to identify and assess potential modern slavery risks across its operations, supply chains and investments. Recognising that any instance of modern slavery presents a risk to the wellbeing of individuals, Hostplus remains committed to understanding how its business activities may cause, contribute to, or be directly linked to modern slavery.

Hostplus continued to leverage the expertise of an external consultant to undertake a detailed risk assessment of both its operational suppliers and investment portfolio.

Using their own proprietary, integrated assessment engine, the external consultant calculated the modern slavery risk profile of Hostplus' business activities to the tenth tier of the supply chain. This exercise was conducted using a balanced, global multi-regional input-output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. The MRIO was then examined against several international standards and key human rights data sources.

A proprietary algorithm was applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier and investment. This assessment does not purport to confirm the actual existence (or non-existence) of slavery in Hostplus' supply chains and investments.

This approach to modern slavery risk assessment has included examination and analysis of the suppliers, investments and industries with the most elevated risk of modern slavery, reported by geography, industry and the depth of the risk within the supply-chain tiers. The results of this exercise, as will be explored on the next page, provide the basis for target areas of ongoing due diligence and steps to address modern slavery risk not only in the present reporting period but for upcoming years.





Operations

Hostplus' direct operations have been assessed as being a low risk for modern slavery. Hostplus' business operations are solely conducted in Australia. The Hostplus workforce is primarily comprised of tertiary-educated and experienced professionals employed in a low-risk sector. All employees are engaged directly under an enterprise agreement and formal written employment contracts.

A small proportion of Hostplus' workforce – less than 4% in FY25 – may, from time to time, include individuals on a fixed-term contracts. The very low operational risk of these arrangements is mitigated by coverage under Australian National Employment Standards and the skilled and professional nature of the roles that are typically filled by shorter-term contracted employees.

Supply chains

Compared to the previous reporting period, Hostplus does not consider there to have been any material changes in its supply chain characteristics or procurement spend relevant to its overall modern slavery risk profile. The majority of procurement spend in FY25 remained concentrated in Australia, where the inherent risk of modern slavery is low.

Hostplus' direct suppliers continue to be predominantly Australian based, covering categories typical for a financial services institution of its size and nature. The results of the proprietary risk assessment indicate that the overall risk of modern slavery within our direct supply chain continues to remain low.

A very small number of our suppliers were identified as presenting moderate to moderately low risk (less than 0.1%), with no supplier presenting high risk. Based on the results of the proprietary risk assessment, it was determined that no further action was required.

Modern slavery risk may still exist indirectly within upstream supply chains. For example, sectors such as business services, financial services, and public administration often rely on third party providers for services such as cleaning and recruitment, while the food and beverage sectors may depend on agricultural labour. Both types of arrangements can present elevated modern slavery risks due to the characteristics of the labour involved and the potential vulnerabilities of the workers.





Investments

Hostplus recognises that its investment portfolio presents a broader and more complex exposure to modern slavery risks than its procurement activities, due to its scale, geographic diversity, and sectoral reach. As such, the most impactful way that Hostplus can seek to identify, assess and address modern slavery risk is through its investment activities. Hostplus has chosen to apply a more detailed focus on the investment portfolio for the purposes of this statement and ongoing due diligence.

In line with this understanding, Hostplus commissioned an independent modern slavery risk assessment of its investment portfolio, using a proprietary methodology based on MRIO modelling.

The overall risk assessment results indicated a broad spectrum of potential risk levels in the investment portfolio. Notably, Hostplus' highest value investments were assessed as predominantly low risk at the first tier. This is because they were invested in a range of low-risk categories, such as Australian banking institutions and other investments in countries with lower prevalence of modern slavery.

Across the total portfolio, investments identified as having the highest inherent risks were those within emerging markets, such as India, Brazil, Turkey and Mexico, attributable to the relatively higher modern slavery prevalence in those areas. The geographic risk across the investment portfolio is not confined to one specific region or country, owing to the wide range of assets across many asset classes.

A comparative view across asset classes indicated that assets with complex supply chains, or those reliant on manufactured products (such as retailers, construction, machinery and textiles), also carry potentially elevated risks of modern slavery. These risks are associated with the opacity of complex supply chains, high-pressure supply-and-demand business models, and a reliance on potentially vulnerable labour.

Hostplus will continue to integrate these insights into its modern slavery response framework, using them to inform stewardship activities and collaborative engagement efforts. These actions will form part of Hostplus' ongoing commitment to addressing modern slavery risks in a structured and evidence-based manner, in line with its obligations under the Act.

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS



(Mandatory criteria – s.16(1)(d))

As part of Hostplus' long-term commitment to significantly improve its overall approach to addressing modern slavery risk, Hostplus undertook a holistic update of the key pillars of its modern slavery response framework.

Governance

Modern Slavery Steering Committee

The Modern Slavery Steering Committee, chaired by the Chief Risk Officer (CRO), is responsible for the development and implementation of Hostplus' Modern Slavery response framework. The Committee operates under formalised Terms of Reference that govern its conduct and clearly outline its roles and responsibilities, including oversight of strategic initiatives and risk mitigation efforts. It provides regular reports, detailing progress on modern slavery initiatives, tracking commitments made in Hostplus' Modern Slavery Statement, and identifying emerging trends or issues relevant to the program. Through this structured governance framework, the steering committee ensures accountability and continuous improvement in Hostplus' approach to addressing modern slavery risks.

RACI framework

During the reporting period, Hostplus developed a RACI framework to clearly define the roles and responsibilities of all stakeholders involved in its efforts to address modern slavery. By delineating who is Responsible, Accountable, Consulted, and Informed at each stage of the anti-slavery initiatives, the RACI aims to promote transparency, accountability, and effective collaboration across all levels of the organisation. The framework supports Hostplus' coordinated approach to managing modern slavery risks across its operations, supply chain, and investments.

Modern Slavery response framework

The Modern Slavery response framework articulates Hostplus' systematic approach to identifying, assessing, mitigating, and remediating modern slavery risks across its operations, investment activities, and supply chains. The framework embeds governance structures, due diligence processes, risk management protocols, and training initiatives to support the organisation's commitment to human rights, ethical conduct, and transparency. It serves as a foundational tool for the development and implementation of Hostplus' annual Modern Slavery Statement and reinforces the Fund's ongoing efforts to uphold responsible business practices across all areas of operations.

Due diligence

Refinement of the due diligence framework for suppliers and investments

Acknowledging the distinct considerations and risk profiles associated with modern slavery in its supply chains and investment activities, Hostplus has established separate modern slavery due diligence frameworks for each respective area. During the reporting period, the supply chain framework was further refined to strengthen its effectiveness and applicability. These frameworks are intended to provide comprehensive and practical guidance for team members to integrate modern slavery due diligence into critical stages of the procurement lifecycle and investment process.

Tailored self-assessment questionnaires for external fund managers

Hostplus has implemented an annual self-assessment questionnaire process for its incumbent external fund managers as part of its baseline due diligence on modern slavery risks, with the survey forming part of the Fund's modern slavery response framework. The tailored survey is designed to assess the quality of modern slavery risk identification, due diligence, and mitigation practices employed by fund managers.



Engagement

Investment engagement through ACSI and Federated Hermes EOS

Through its partnerships with specialist engagement providers the Australian Council of Superannuation Investors (**ACSI**) and Federated Hermes EOS (**EOS**), Hostplus continues to engage with listed companies on a broad range of environmental, social and governance (ESG) issues, including those specifically relating to modern slavery. ACSI is engaged to provide research, undertake Australian listed company engagement, advocate for improved business practices and make voting recommendations to support the Fund's commitment to active ownership. EOS is engaged to provide research, engage with listed international companies, and advocate ESG issues, also in support of the Fund's active ownership approach. Their engagements in relation to modern slavery focus on addressing systemic labour rights issues and promoting responsible business practices. These engagements form part of Hostplus' broader due diligence approach to identifying and addressing modern slavery risks. Engagement outcomes may include addressing particular modern slavery risks identified within a company's supply chain, or improving disclosure on the risks companies face.

Training

Training program for Trustee (procurement / supply chain) and investments

As part of Hostplus' ongoing commitment to ethical practices and the elimination of modern slavery in all forms, a comprehensive modern slavery training program was delivered to all staff across the organisation. The training aimed to enhance awareness and understanding of modern slavery, including its various forms, risk factors and the impact it has on individuals and communities. It also outlined Hostplus' obligations under the Act and provided clear guidance on how to identify, report and respond to any suspected instances of modern slavery within Hostplus' operations, supply chain and investments.

Prior to its rollout, the training program was thoroughly reviewed and endorsed by the Modern Slavery Steering Committee to ensure its accuracy, relevance, and alignment with current best practices and legislative updates.

Remedy

Development of a Corrective Action Position Statement

Successive reporting periods of comprehensive risk assessment indicate the low likelihood of modern slavery practices of any kind in the Fund's operations or those of its direct suppliers.

However, Hostplus recognises the importance of being prepared by developing clear and victim-centred remedial pathways. In the reporting period, Hostplus refined its corrective action plan, which outlines guidelines for addressing confirmed instances of modern slavery and non-compliance by suppliers or third parties. It is based on principles that prioritise victims, ensure proportionality and timeliness, promote collaboration and transparency, and focus on prevention.

The plan specifies triggers for initiating corrective actions, sets out the requirements for the development and implementation of corrective actions, and establishes monitoring and reporting procedures to support effective resolution and prevent future incidents.



ASSESSING EFFECTIVENESS



(Mandatory criteria – s.16(1)(e))

Hostplus has developed and approved a measuring effectiveness framework to support its response to modern slavery risks. The modern slavery measuring effectiveness standard outlines the process Hostplus follows to identify, measure, monitor, and report on effectiveness metrics.

These metrics provide an objective assessment of how Hostplus is addressing modern slavery risks across its operations, supply chain, and investment portfolio.

FY25 marks the first time Hostplus is reporting on effectiveness using the key performance indicators (KPIs) outlined below. These KPIs provide a basis for assessing progress and continuous improvement of the modern slavery response framework and will be reflected in Hostplus' annual Modern Slavery Statement.

The Modern Slavery Steering Committee will leverage insights from the annual risk assessment to refine and enhance the selection of effectiveness metrics for future reporting periods, supporting continuous improvement in Hostplus' approach to managing modern slavery risks.

Area	Metric	Metric Description	Target	Result
Governance and oversight	Adoption of a Modern Slavery Policy.	Modern Slavery Policy approved by the board on biennial basis.	Board approved Modern Slavery Policy.	Modern Slavery Policy approved by the Board in August 2024.
	Modern slavery training.	% of annual modern slavery training completed by eligible staff.	100%	100%
	Modern Slavery Steering Committee.	The Modern Slavery Steering Committee meets at least four times a year.	4	6
Risk identification and assessment	Risk assessment conducted (Investments).	% of portfolio reviewed for modern slavery risk.	100%*	100%*
	Risk assessment conducted (Trustee).	% of trustee expenditure reviewed for modern slavery risk.	100%	100%
Risk mitigation and remediation	Modern slavery questionnaire.	% of new supplier modern slavery questionnaires assessed for the Trustee office.	100%	100%
Monitoring and reporting	Modern Slavery Statement.	Results from annual risk assessment included in the annual modern slavery statement.	Outcomes from FY25 risk assessment have been incorporated in the statement	Outcomes from FY25 risk assessment have been incorporated in the statement.

*This metric may exclude investments related to FX forwards, cash, managers undergoing onboarding and redemption, and direct and immaterial holdings.





FY25 Modern Slavery Statement commitments – progress update

Hostplus acknowledges that consistent alignment between intended actions and those implemented over successive reporting periods is a critical measure of effectiveness in addressing modern slavery risks. Accordingly, the following provides an update on the progress made in relation to the key activities outlined in the 'Looking Forward' section of the previous Statement.

Business unit	Commitment	Activity	Status
Investments	Strengthen investment practices to address modern slavery risks.	Review the Responsible Investment Policy to consider incorporating further modern slavery provisions.	Completed
		Review opportunities for engagement with external collaborators.	Ongoing
Procurement	Enhance supplier risk management.	Refine the procurement due diligence framework.	Completed
	Promote ethical standards across the supply chain.	Implement Supplier Code of Conduct.	Completed
Modern Slavery Working Group	Establish a strategic and measurable approach to modern slavery risk management.	Develop a three-year roadmap.	Completed
	Strengthen governance and accountability frameworks.	Update the modern slavery response framework.	Completed
	Measure and monitor the effectiveness of modern slavery initiatives.	Implement new effectiveness metrics.	Completed
	Ensure remediation paths for identified modern slavery risks.	Develop a corrective action plan framework to remediate reported instances of modern slavery.	Completed
Risk	Strengthen governance and accountability mechanisms within the modern slavery framework.	Develop the RACI matrix to support an updated modern slavery framework.	Completed
		Review of the Whistleblower Policy to incorporate modern slavery provisions.	Ongoing (to align with policy review cycle).
Legal	Embed modern slavery protections into legal agreements.	Review contract provisions to identify clauses relevant to modern slavery.	Completed
		Seek to identify key metrics/KPIs to measure success of these provisions.	Completed
Human Resources	Build awareness and capability to identify and respond to modern slavery risks.	Update training materials to include relevant updated policies including modern slavery.	Completed
		Deliver training to key stakeholder group as required.	Ongoing

OTHER RELEVANT INFORMATION

(Mandatory criteria – s.16(1)(g))



Planned actions

Hostplus is committed to demonstrating ongoing improvement in identifying, assessing and addressing modern slavery risk in the supply chains. In FY26, Hostplus intends to focus on the following key activities:

Pillar	FY26 focus areas
Policy and governance	<ul style="list-style-type: none">Review and update the Whistleblower Policy at the next review cycle to incorporate modern slavery provisions.Operationalise the Supplier Code of Conduct within the Governance, Risk and Compliance (GRC) system.Monitor regulatory changes and review the three-year roadmap for continued alignment with legal and ethical standards.
Due diligence (investments)	<ul style="list-style-type: none">Refine the due diligence framework for the investment portfolio.Refine the modern slavery due diligence prioritisation methodology for the portfolio.
Due diligence (supply chain)	<ul style="list-style-type: none">Implement refined supply chain due diligence framework into business operations.Conduct and report on supplier due diligence activities to ensure transparency and accountability.
Training	<ul style="list-style-type: none">Deliver annual training to all staff.Provide specialised training to board to support their oversight of modern slavery risks.Update training materials to reflect policy and regulatory changes, where applicable.
External collaboration	<ul style="list-style-type: none">Review strategy for FY2026 to increase engagement with external collaborators e.g. independent membership of Investors Against Slavery and Trafficking (IAST APAC), increased involvement with Responsible Investment Association Australasia (RIAA) etc. in accordance with findings of the risk analysis.
Reporting and monitoring	<ul style="list-style-type: none">Review, endorse and track modern slavery effectiveness metrics for FY26 to measure progress.Prepare and publish the annual Modern Slavery Statement in accordance with legislative requirements.



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