

# Modern Slavery Statement

**FY2025**

# Acknowledgement of Country

We acknowledge the Traditional Custodians of the lands on which we work and live and recognise their continuing connection to land, water, and community. We pay our respects to Elders past and present.

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# Futurity's commitment to eradicating modern slavery

Futurity Investment Group Limited (Futurity) is a mutually structured organisation committed to having positive social impact. This is achieved in several ways including through our operations, our advocacy and philanthropy.

Futurity is committed to living its values of curiosity, courage, care, passion, and results. A critical part of this is not only ensuring that we conduct our business within the law, but that we as an organisation seek to act as a model corporate citizen.

Futurity operates under a Code of Conduct known as *Our Ways of Working* which outlines the ethical framework we operate within. Our Ways of Working support and build on our values by describing how we strive to live our values in our day-to-day activities.

Futurity's fifth Modern Slavery Statement ("Statement") is published in accordance with the Modern Slavery Act 2018 (Cth) (Modern Slavery Act) on a voluntary basis covering the period 1 July 2024 to 30 June 2025 ("Reporting Period").

The Statement outlines Futurity's approach to identifying, assessing and addressing modern slavery risks in our operations, supply chain and investments.

The offence of modern slavery occurs where offenders use deception, coercion or threats to exploit victims and undermine their freedom. It is entirely counter to our law and community values. Wherever it occurs, it is counter to basic human rights.

Futurity understands that modern slavery has severe consequences for victims and that it can occur in every industry and sector, and any location.

As an Australian-based financial services organisation providing education-purposed savings and investment products, Futurity is potentially exposed to the risk of modern slavery on two levels - in our operations and supply chains, but also through our investment activity.

As a purpose driven organisation, Futurity aims to continuously improve its approach to ethical and sustainable business across all operations, including our wholly owned subsidiary and through our related charitable endeavours, the NEiTA Foundation Trust and Futurity Education Foundation Limited.



Dr Jacqueline Jennings, Board Chair



Sam Sondhi, CEO

December 10, 2025

## Criteria 1.0

### Identifying the reporting entity

This Modern Slavery Statement is prepared and issued by Futurity Investment Group Limited, ACN 087648879, AFSL 236665, ACL 236665. (Futurity”, “we”, “us”, “our”, or the “parent” company).

Our subsidiary is non-operational and supported by our resources. In assessing the risks of modern slavery that may exist within our supply chain we have considered our subsidiary to be at the same risk level as the parent company.

## Criteria 2.0

### Describe the entity’s structure, operations and supply chains

#### **STRUCTURE**

Futurity, formerly Australian Scholarships Group Friendly Society Limited, is a registered Friendly Society, operating primarily in Australia, with its funds in New Zealand now closed to new business.

Futurity is a mutually structured company limited by shares and guarantee with only customer members. No shares are currently issued.

We employ 47 staff and have a Board of Directors.

#### **OPERATIONS**

Futurity distributes Education Bond products via two main channels, online and via licensed financial advisers.

Given the nature of Futurity’s business, the risk of modern slavery practices occurring within its business operations is assessed as low.

This is based on Futurity being a financial services business providing investment and savings plan style products, combined with its business operations being Australia-based.

#### **SUPPLY CHAIN**

Our supply chains include our externally managed investments and goods and services generally supplied to us, including those procured to support our internal operations.

We recognise the possibility that we have indirect exposure to modern slavery risk within our supply chain and our investment activity. We operate in Australia and New Zealand, and the products and services purchased by Futurity are generally limited to information technology (hardware, software and services), professional services, marketing materials and services, utilities, office supplies and food and beverage supplies.

The majority of our contracted suppliers are based in Australia where there is a low inherent risk of modern slavery practices.

Futurity selectively assesses suppliers for potential modern slavery risk, by considering both the expenditure level and the assessed level of risk. This year we reviewed supplier Modern Slavery Statements or for those suppliers without a Modern Slavery Statement, we analysed their responses to our targeted questionnaire.

## EXTERNALLY-MANAGED INVESTMENTS

Our supply chain also consists of investments which are controlled by external investment managers. We currently have investments across 20 different investment managers. Futurity's investments may be indirectly exposed to modern slavery risks through the operations of the companies in which external funds invest.

Of the 20 investment managers, 19 have a published Modern Slavery Statement, the remaining investment manager completed the self-assessment questionnaire.

As a result of testing the supply chain within the reporting period, Futurity's assessments of its overall modern slavery risk is **low**.

## Criteria 3.0

### Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

As an Australian-based financial services organisation, Futurity may be exposed to the risk of modern slavery - in our operations and supply chains, but also through investment activities.

## SUPPLY CHAIN

Most of Futurity's contracted suppliers are based in Australia and subject to Australian law.

Our main categories of procurement were of the following goods and services:

- Information and communication technology

- Investment advisory services
- Insurance
- Professional consultancy and advisory
- Property services
- General office consumables
- Marketing
- Promotional products

Futurity tested our supply chain through reviewing the Modern Slavery Statements of all those suppliers who report and sending a self-assessment questionnaire to those who do not report.

This year we broadened our focus to all suppliers, using a risk assessment to identify suppliers where a modern slavery risk may exist. This was an improvement on last year when we focused our modern slavery risk assessment on suppliers with whom we had contracts valued at \$50,000 per annum or above. Following this due diligence process we have not identified any new risks and have not changed our risk rating.

## INVESTMENTS

Futurity recognises that investment decisions made by the external investment managers appointed to invest on behalf of our multi-manager funds may indirectly expose Futurity to modern slavery risks.

Such risk may be heightened where the business ultimately receiving the capital from Futurity is domiciled in a high-risk jurisdiction or where it is involved in an industry known to have a high risk of modern slavery.

While Futurity does not make the individual investment decisions in these circumstances, it is important for us to make sure our investment managers consider modern slavery risk in their investment processes.

Consistent with Futurity's Responsible Investment Policy, our investment manager selection process includes an assessment of how each investment manager addresses and incorporates Environmental Social Governance (ESG) issues as part of their investment approach.

Our assessment of Futurity's overall modern slavery risk remains **low**.

## Criteria 4.0

### Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

Futurity continually monitors and manages modern slavery risks across our operations, supply chain and investments.

If Futurity becomes aware of any activity that may contribute to modern slavery, we act immediately to investigate and remediate the risk.

During the Reporting Period, we **enhanced our risk assessment and due diligence processes** by:

- Expanding our supplier self-assessment criteria to include smaller contracts (under \$50,000 per annum) where potential risk was identified. This increased the number of contract providers who were assessed in the FY25 year.
- Continuing our Responsible Investment Policy monitoring program introduced in 2023.

#### SUPPLIER ASSESSMENT

Suppliers identified as having potential exposure to modern slavery risks who do not have a published Modern Slavery Statement are asked to complete Futurity's **Modern Slavery Self-Assessment Questionnaire**, which covers:

1. **Supplier details** – confirming supplier identification and coverage.
2. **Policies and procedures** – understanding how suppliers manage modern slavery risks.
3. **Supply chain management** – identifying how suppliers assess risks in their own supply chains.
4. **Existence of modern slavery risks** – determining if risks have been identified and addressed.
5. **Foreign labour use** – assessing possible risks from international operations or contractors.

In FY25, **51 suppliers** and **20 investment managers** were reviewed through surveys or their published Modern Slavery Statements.

#### INVESTMENT OVERSIGHT

Futurity recognises potential indirect exposure through our investments and requires all external investment managers to:

- Adhere to Futurity’s Responsible Investment Policy, which promotes ethical investment practices.
- Support the UN Principles for Responsible Investment (UNPRI) and/or the UN Global Compact (UNGC). Over 90% of our total funds are managed by investment managers who are signatories to these frameworks.

## Criteria 5.0

### Describe how the reporting entity assesses the effectiveness of these actions

Futurity evaluates the effectiveness of our actions through regular monitoring, reviews, and data tracking.

#### KEY MEASURES

- **Supplier engagement:** This year, 17 suppliers received the questionnaire and **53% responded**, an improvement from **38%** in the previous year.
- **Investment manager oversight:** All investment managers provided evidence of their commitment to managing modern slavery risks.
- **Staff training:** Futurity tracks completion of mandatory training modules, including *Combatting Modern Slavery*, *Futurity Whistleblower Service*, and *Code of Conduct*.
  - The *Combatting Modern Slavery* module achieved a **100% completion rate** this year.
- **Grievance process:** Our grievance mechanisms are monitored; **no modern slavery-related grievances** were reported this year.

#### CONTINUOUS IMPROVEMENT

We review and refine our approach annually by assessing current and new suppliers. Based on these reviews, we adjust our due diligence and monitoring processes.

In the next reporting period, Futurity will:

- Introduce a **Supplier Statement** to strengthen awareness of modern slavery risks and expectations.
- Work to **increase supplier response rates** to our questionnaire.
- Enhance **contract due diligence** to ensure supplier alignment with our modern slavery commitments.
- Review the **effectiveness of our risk assessment and remediation processes** to ensure they remain robust and fit for purpose.

## Criteria 6.0

### Describe the process of consultation with any entities the reporting entity owns or controls

Not required. This report relates to the operations of a single entity, Futurity Investment Group Limited.

## Criteria 7.0

### Provide any other relevant information

As a purpose driven business with a focus on social impact, Futurity is engaging with more suppliers who operate with a social benefits impact model and is looking to increase our engagement with First Nations owned businesses as part of our Reflect Reconciliation Action Plan.

This statement was approved by the Board of Futurity Investment Group Limited on 10 December 2025.