



MODERN SLAVERY STATEMENT FY 2021

This Modern Slavery Statement (Statement) is made for the purposes of and in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) ("the Act", "MSA"). The Statement covers the financial year ended 30 June 2021 and addresses the mandatory criteria set out in the Act.

BEST Superannuation Pty Ltd (ABN 57 070 732 008, AFSL 530672) as trustee of the Goldman Sachs & JBWere Superannuation Fund (ABN 55 697 537 183) is the reporting entity under the Act.

Modern Slavery can occur in many forms including human trafficking, slavery, domestic servitude, forced labour, bonded labour and child labour. We understand that our business activities and the decisions we make have the potential to impact the risk of modern slavery practices. We are committed to reducing this risk within our operations and supply chains, including investment activities. This is our first Modern Slavery Statement under the Act.

1. Structure, operations and supply chains of the reporting entity

BEST Superannuation Pty Ltd ABN 57 070 732 008 (“Best Super”, “Trustee”) is the trustee of the Goldman Sachs & JBWere Superannuation Fund ABN 55 697 537 183 (“Fund”) and is the reporting entity for the purposes of the Act.

Best Super is an Australian proprietary company incorporated in Melbourne, Victoria and holds an RSE Licence from the Australian Prudential Regulation Authority, which authorises it to act as the trustee of the Fund. The Trustee also holds an Australian Financial Services Licence from the Australian Securities and Investments Commission authorising it to deal in a superannuation product and provide a superannuation trustee service to retail clients.

The Trustee Board comprises of six directors – three employer representative directors and three member representative directors (two of the employer and member representative directors are from or appointed by Goldman Sachs Australia Services Pty Ltd, and one of the employer and member representative directors are from National Australia Bank Limited, working principally in the JBWere business). The Trustee also has two Alternate Directors.

The Trustee Board has three sub-committees: Audit, Risk and Compliance Committee, Investment Committee and Remuneration Committee. The Trustee Board’s Audit, Risk and Compliance Committee is responsible for reviewing and implementing the Modern Slavery requirements and making recommendations to the Trustee Board from time to time. The Trustee Board remains accountable for compliance with the Modern Slavery requirements, and this Statement.

The Trustee issues all interests in the Fund and oversees the prudent management of the Fund. The Fund is a non-public offer corporate fund, which means that its membership is limited to employees of Goldman Sachs Australia Services Pty Ltd and National Australia Bank Ltd who primarily work in the JBWere Ltd business. The Fund also extends membership to spouses of employees and former employees.

The Fund was established by trust deed effective 1 July 1958 and is primarily a defined contribution (accumulation) fund, although a smaller component of the Fund’s investments relate to a defined benefit fund. As at the end of FY21, the Fund has more than 1,700 members and approximately \$689,848,263.33 in total assets under management.

Operations

The Trustee offers superannuation, insurance, and pension benefits (including a MySuper approved product) within the Fund.

The Trustee is responsible for the operation of the Fund in accordance with the relevant trust deed and legislative requirements. As the Trustee of the Fund, our responsibilities include setting strategic and business objectives, overseeing the administration of the Fund and managing the investment activities of the Fund in accordance with the Investment Governance Framework. This includes consideration of environmental, governance and social risks, such as the risk of modern slavery practices within our operations and supply chain, including investment activities.

Under our current structure, the Trustee does not employ any staff and undertakes its business activities (including the Fund Secretariat function) through outsourced arrangements, except for a number of direct investments (via ASX listed companies) which are managed directly by the Trustee’s Investment Committee. The Trustee also has a contract with one director on the Board.

Our Suppliers

The Trustee uses services and products provided by third party providers. These services and products (as well as the services and products provided to our direct suppliers) form part of our supply chain.

The following key service providers form part of our direct supply chain (i.e. those with whom we have a direct contractual relationship):

- Fund Administrator
- Insurer
- Custodian
- Fund Secretary
- Risk and Compliance Officer
- Legal
- Actuary
- Auditors and Tax Agent
- Investment Managers

Further details of these suppliers are available in the FY21 annual report published on our [website](#).

The selection and appointment of service providers, including investment managers, is subject to a due diligence assessment process in line with our Outsourcing Policy and Investment Governance Framework. Key suppliers are engaged through contracts and subject to written and agreed upon terms and conditions, including regular monitoring to assess performance and service delivery.

Our suppliers are predominantly in the financial and professional services categories and are located in Australia. The majority of our supplier relationships have been stable and long term.

We expect our suppliers and service providers to conduct their business responsibly, in line with applicable laws and social norms. Specifically, we expect our service providers will assess and address any adverse impacts on human rights, including modern slavery, in the supply of services to the Fund, commensurate with the level of risk.

Our Investments

Our investment portfolio includes investments across a number of asset classes including Australian and international equities, Australian and international government and corporate bonds, Australian and international listed and unlisted infrastructure, alternative strategies and cash. We work with 20 to 25 investment managers. Our investments span both developed and emerging countries across a diverse range of industries.

Our Investment Governance Framework includes our investment beliefs. The Annual Report 2021 provides some information on the Environmental, Social and Governance considerations of our investment approach.

2. The risks of modern slavery practices in the operations and supply chains of the reporting entity

Modern slavery involves the most serious forms of exploitation. The risk of modern slavery refers to the risk to people, rather than the risk to reporting or related entities. The MSA defines modern slavery as including trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour means situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Given the nature and locations of our operations, service providers and investment exposures, we recognise that we are at risk of both direct and indirect exposure to modern slavery impacts. Accordingly, we seek to understand our impacts and exercise influence to manage and mitigate where possible including through engagement with our service providers.

Our risk assessment analysis and understanding of inherent risks in our operations, supply chain and investments indicate that:

- The risk of modern slavery is unlikely to exist in our direct operations given the nature of our business (we operate in a financial services sector), our structure, the products and services we offer and the fact that we operate in Australia, which the Global Slavery Index finds to have a low estimated prevalence of modern slavery.
- The risk of modern slavery in our direct supply chain, including investment managers, is very low because our direct suppliers are concentrated around a small number of professional, legal, financial and insurance service providers which have high entry barriers (e.g. requiring trained professional staff). However, we recognise that there is likely to be modern slavery risk exposure in further tiers of our supply chain, and seek to better understand and manage this over time, through further engagement with our direct suppliers.
- The risk of modern slavery in our investment portfolio, considered to be a primary area of modern slavery risk for the Trustee, identified a number of higher risk asset classes, being those with likely investments in high risk countries and regions. Emerging market equity was identified as the highest risk asset class due to the likely high risk country and industry exposures of typical holdings in this asset class. The next risk category was 'moderate risk' which contained four asset classes (International Equities, International Corporate Credit, International Infrastructure and International Alternatives). We will prioritise further engagement with managers with investments in the high and moderate risk asset classes.

3. Actions taken by the reporting entity to assess and address those risks, including due diligence and remediation processes

The Trustee seeks to uphold its responsibilities under the Act through the implementation of arrangements targeted at assessing and addressing modern slavery risks within its operations and supply chains, including investments.

We engaged an external advisor to conduct a modern slavery risk assessment covering our operations, direct suppliers and our investment portfolio. The approach adopted focused predominantly on the potential risks to people of modern slavery rather than risks to the Fund or the Trustee, and considered the potential that the Trustee may possibly cause, contribute and/or be directly linked to modern slavery practices.

The assessment utilised country and industry risk factors, including sector, product and services related risks and independent research was used to identify those countries and industries with the greatest modern slavery risks. The risk assessment was applied to our operations, all of our direct suppliers (being those with whom the Fund has a direct contractual relationship), including investment managers, and our investment portfolio. The investment portfolio was assessed at the asset class level based on country and global industry risk factors, individual holdings were not risk assessed and the results were grouped into high risk, moderate risk, low risk and very low risk.

We identified that our investment portfolio was the primary area of modern slavery risk and the emerging market equity asset class had a high risk rating. There are two managers in that asset class. The next risk category was 'moderate risk' which contained four asset classes (International Equities, International Corporate Credit, International Infrastructure and International Alternatives), capturing 14 manager strategies. The Trustee will prioritise these asset classes and managers for further engagement.

Addressing Risk

The Trustee has a detailed process for selecting and appointing suppliers, including investment managers. This process has been updated to include modern slavery considerations.

In FY21 the Trustee developed a detailed modern slavery questionnaire and commenced trial roll-out and engagement, including requiring completion of the initial modern slavery questionnaire. The objective was to gain a better understanding of the actions taken by managers to identify and address the risks of modern

slavery in their investment portfolios, as well as gather more insights into managers' exposure to modern slavery risks.

The Trustee has also introduced regular monitoring of the investment managers' approach to modern slavery risk by requiring managers to provide quarterly updates in respect to their modern slavery risks.

As this is an evolving area of analysis, the trustee used engagement with an initial manager to support the establishment of an appropriate questionnaire and the attestation process.

The modern slavery questionnaire and regular monitoring and updates aim to reinforce the importance the Trustee places on modern slavery risks and we expect it to help drive continuous improvement in the investments managers' approach to assessing and addressing modern slavery risk. The questionnaire and quarterly updates are planned to be progressively rolled out to the rest of our investment managers.

The Trustee also has in place the following policies and initiatives that help in addressing the risk of modern slavery in our operations, supply chain and investments:

- Anti-Money Laundering and Counter-Terrorism Financing Policy
- Whistleblowing Policy
- Conflicts of Interest Policy
- Outsourcing Policy
- Risk Governance Framework
- Governance Framework
- Investment Governance Framework.

Remediation

The Trustee has a publically available Whistleblowing Policy and related procedures, and is committed to creating and maintaining an environment in which people (including service providers) are able to safely raise concerns regarding actual or suspected unethical, unlawful or undesirable conduct.

If the Trustee becomes aware of a modern slavery incident (actual or potential) in our operations, supply chain or investments, we will investigate the matter and take appropriate remediation steps. The remediation open to the Trustee will depend on the circumstances of a matter.

If we identify that the Trustee may have caused or contributed to adverse impact we will provide, or co-operate, in the remediation of the adverse impact. If the Trustee is directly linked (through our supply chain) to a modern slavery incident, but did not cause or contribute to the harm arising from the incident, we will strive to use our leverage (if sufficient) with the supplier that caused the impact to prevent or mitigate the harm and its recurrence. Where this is not successful, the Trustee will review and consider ending business relationships with the supplier that caused the harm.

4. How the reporting entity assesses the effectiveness of such actions

In our first year of reporting under the Act, we have focused on building the foundations for identifying, assessing and addressing modern slavery risks. We recognise that this is a process of continuous improvement. Given our modern slavery activities have only recently been established, we structured an effectiveness review to give us insight into how well our activities had been designed and implemented, and how we might improve it in future.

We will continue to develop our effectiveness assessment framework to improve our review processes. The COVID-19 pandemic did not significantly impact the Trustee's ability to identify and address its modern slavery risks in operations, supply chains and investment activities during the first and second reporting years.

5. Process of consultation with any entities that the reporting entity owns or controls

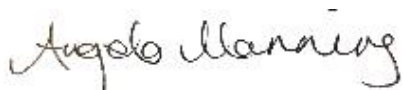
We do not own or control any other entities.

6. Include any other information that the reporting entity considers relevant

This is our first Modern Slavery Statement. The Trustee will remain focused on understanding and responding to the risk of modern slavery in our operations, supply chain and investments. We are planning to prioritise engagement with investment managers identified in the high risk and moderate risk asset classes where we hold a meaningful investment allocation and can influence change.

This statement was approved by the board of BEST Superannuation Pty Ltd (ABN 57 070 732 008, AFSL 530672) as trustee of the Goldman Sachs & JBWere Superannuation Fund (ABN 55 697 537 183) on 14 December 2021.

This Statement is signed by Angela Manning in her role as Chair of BEST Superannuation Pty Ltd on 20 December 2021.

A handwritten signature in black ink that reads "Angela Manning". The signature is written in a cursive, flowing style.

Chairman of BEST Superannuation Pty Ltd

20 December 2021