

Modern Slavery Statement December 2020

1. Our business structure and operations

AvSuper is a profit for member super fund combining features of industry, corporate and retail funds. AvSuper operates for the benefit of members (and their beneficiaries), many of whom are drawn from the aviation and aviation safety industries, as well as people who are self-employed, in other industries or who are not working at all.

AvSuper currently has 13 employees. It is not part of a larger corporate group nor does it own or control other entities. No goods are included in the services.

AvSuper considers the risk of modern slavery within its direct business operation to be low. However, AvSuper recognises that through its supply chain and vendors, we may be indirectly exposed to the risk of modern slavery and human trafficking.

AvSuper respects the human rights of our employees, members and those of our suppliers, service providers and other stakeholders. AvSuper is working through the implementation of a risk management process to identify, assess, mitigate and monitor potential risk areas where AvSuper may be directly or indirectly exposed to human rights concerns

2. Our supply chain

Our supply chain includes providers of office services/supplies, insurers, IT service providers, external consultants and other professional services located primarily in Australia. Professional services include investment advisory, administration, custodial and actuarial services.

Based on the supply chain profile, the risk of modern slavery practices is relatively limited. AvSuper aims to build supportive and collaborative relationships with stakeholders and we encourage our stakeholders to manage their business and supply chain in a manner that upholds human rights.

To address modern slavery risks within our supply chains AvSuper aims to :

- Endeavour to specifically refer to modern slavery in future contractual arrangements, and request that parties use reasonable endeavours to avoid modern slavery practices
- Implement processes to respond to risks of modern slavery practices through our whistle blower policy.
- Identify and monitor as practicable, the broad operation and overall supply chain structure where modern slavery risks are likely to be most significant. This includes exposure to high risk populations, geographies, products, services and business models.
- Evaluate modern slavery risk in our portfolios with the assistance of service providers including the Fund investment advisor and investment managers.

3. Our Workplace

All employees of AvSuper are domiciled in Australia, with terms of employment that meet or exceed the Australian Fair Work Act. AvSuper staff are paid in accordance with Australian Taxation law. The Work Health and Safety Policy, Code of Conduct and the HR Management Guideline is made available to all employees.

4. Steps Taken

As part of our strong and ethical culture AvSuper has:

- Engaged in discussion on modern slavery at the senior executive and trustee level. The Trustee will be provided with sufficient information to ensure that Management are managing risks appropriately.
- Consulted with material providers to identify, assess and address risks of modern slavery practices.
- Begun to review supply chains to identify risks of modern slavery practices, focussing on areas of higher risk initially.
- Considered updating future contractual arrangements to include a modern slavery clause.
- Committed to and supports modern slavery reporting and disclosure.
- Committed to respond to allegations by engaging directly with affected stakeholders (or via supplier) and disclose findings and if required, actions to remediate and prevent reoccurrence.

AvSuper's approach to remediation is to address each issue as it arises on a case by case basis and apply principles of fairness and respect for human rights.

5. Continuous Improvement

We aim to create an enhanced understanding of modern slavery risks within our business operations and supply chains by

- Reviewing relevant policies and commercial arrangements to reference modern slavery where practicable
- Improve staff awareness of modern slavery risks.
- Assessing our practices and procedures against the requirements of the Modern Slavery Act.

This statement was approved by the board of trustees for the AvSuper Fund on 17th February 2021.



Ben Firkins
Trustee Chairman
17 February 2021