

## Modern Slavery Statement for the year ended 30 June 2021

### 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 2020 to 30 June 2021.

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

NESS Super 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). NESS Super 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 to the electrotechnology industry. 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 \$970 Million in funds under management for over 12,000 members.

The Trustee is governed by a Board of Directors which includes directors nominated by the ETU, directors nominated by NECA and an independent director. In order to fulfill certain obligations and strengthen its overall governance framework, the Board has established an Audit Risk and Compliance Committee, 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. There are approximately 10 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 and investment consultant. Other professional services provided include accounting, legal, auditing and other services to assist with our obligations.

For a list of our material service providers please visit our website [nesssuper.com.au](https://nesssuper.com.au).

## Our investments

For the year ended 30 June 2021, the Trustee has chosen to have its assets managed through an Implemented Investment Consulting relationship with Russell Investment Management Pty Limited (Russell). This means that the assets are managed within pooled (commingled) vehicles.

The Trustee recognises that when invested in pooled vehicles, the Investment Manager's investment process will determine how it invests. The investment consultant incorporates ethical, social and governance (ESG) factors into their investment processes. The integration of ESG requires that the impact of any ESG issues on the value of a company is included in the valuation process and an understanding of the long-term sustainability of the company.

The current exclusions that may apply to equities include the exclusion of investing in companies that:

- 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.

We have been advised by Russell they will also be incorporating modern slavery considerations into their investment options included in their pooled vehicles.

The Trustee recognises that the identification of risks in modern slavery are evolving. We will continue to work with our Investment Consultant to both incorporate responsible investing and consider modern slavery risks throughout its investment process and to also offer investment options, within the implemented consulting pooled options that meet current requirements.

## Our risk process and assessment

### Risk in Operations

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.

**Risk in our Supply Chain**

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.

**Measuring effectiveness and remediation**

**Remediation**

As this is the initial year in assessing our risks to reduce exposure to modern slavery, our focus has been on building frameworks and how to best to embed in our policies, processes and in the workplace.

To continually improve our programme of work on modern slavery we are planning the following activities in the year ending 30 June 2022:

Outcomes	Measures
Strengthening the Modern Slavery framework	<ul style="list-style-type: none"> <li>The Code of Conduct, Risk Management Strategy and Outsourcing Policy and other relevant policies were updated in June 2021 to reflect Modern Slavery requirements</li> </ul>
Raise awareness of Modern Slavery	<ul style="list-style-type: none"> <li>Implement mandatory Modern Slavery training to all Directors and staff</li> </ul>
Ongoing development of the supplier due diligence program	<ul style="list-style-type: none"> <li>The Outsourcing Policy was updated in June 2021 to include references to Modern Slavery obligations.</li> </ul>
Continuous monitoring and assessment of Modern Slavery Risks	<ul style="list-style-type: none"> <li>Annual risk assessment conducted</li> <li>Risk based oversight of any suppliers identified as likely to have a risk exposure to modern slavery</li> </ul>

This statement was approved by the Board of NESS Super Pty Ltd, as Trustee of NESS Super, at its meeting on 18 June 2021.



**Paul Lahiff**  
Chair  
NESS Super Pty Ltd