

Modern Slavery Statement 2021
Respecting Human Rights

Teachers Mutual Bank Limited

ABN 30 087 650 459
AFSL/Australian Credit Licence No. 238981

Acknowledgement of Country

Teachers Mutual Bank Limited acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and community. We pay our respects to them and their cultures; and to Elders both past and present.

About this Statement

This Modern Slavery Statement (Statement) is made in accordance with the Australian *Modern Slavery Act 2018* (CTh) (Act). It applies to and describes the steps taken by Teachers Mutual Bank Limited during the financial year ending 30 June 2021 to identify, manage and mitigate the specific risks of modern slavery in its operations and supply chain.

This statement has been approved by the Board of Directors.

Maree O'Halloran

Chair of the Board of Directors

December 2021

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Message from the Chair & CEO

Maree O'Halloran and Steve James

This is Teachers Mutual Bank Limited's second Modern Slavery Statement outlining the progress we have made to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chain.

A commitment to respecting all human rights as outlined in the Universal Declaration of Human Rights and core International Labour Organisation conventions is formalised in our Corporate Social Responsibility Policy.

During the past year the world around us has continued to rapidly change through the pandemic, floods, fires and other natural disasters. The community and consumers expect companies do more than just make money. They expect companies to make meaningful contributions to society and act in a responsible way.

As our Bank celebrates 55 years in 2021, we are proud to say that we have continued to build on the values established when we began providing financial services in 1966. We exist for our Members and our model of mutual banking has always been driven by sustainability.

Today we are one of Australia's largest mutual banks and we are committed to being a world-leader in socially responsible banking. We believe we can use our bank to create a better world for our Members and the community. Our Members contribute so much to our society through their work in education, emergency services and healthcare and they want their bank to align with their values. That is why social responsibility is baked in to all of our operations.

A global, collaborative and strategic response is needed to tackle the challenge of modern slavery. As a financial services provider, we acknowledge the risk of being linked to human rights impacts, including via our members and customers, our investments and suppliers. We are working to understand our impacts and exercise positive influence where possible.

As a trusted financial services provider, and significant employer, we recognise that we have a role to play in the global goal to eradicate modern slavery practices, and we expect our people and partners within our value chain to share our commitment. We acknowledge there is more work to do and aim to continuously improve our due diligence to prevent harm and eliminate risks of modern slavery.

Our structure, operations and supply chain

Structure and operations

For 55 years Teachers Mutual Bank (formerly Teachers Credit Union) has provided key financial services for those in the education sector.

Today, Teachers Mutual Bank Limited is one of Australia's largest mutual banks with more than 227,000 members and over \$10 billion in assets supporting five divisions: Teachers Mutual Bank, UniBank, Firefighters Mutual Bank, Health Professionals Bank and Hiver Bank, that provide financial services to essential workers in the education, emergency services, and healthcare sectors. Teachers Mutual Bank Limited is the ultimate parent company and its controlled entities are Q.T Travel Pty Ltd (ABN 63 010 167 503), Tertiary Travel Service Pty Ltd trading as Tertiary Travel (ABN 28 008 900 981) and Edsec Funding Trust No 1. (This Modern Slavery Statement and supply chain review relates to all controlled entities in the group, refer Appendix 1.)

We conduct business throughout Australia, with our head office located in Homebush, NSW, and 10 other offices across the country. We directly employ 590 staff; 107 part time and 483 full time.

We are a member of the Global Alliance for Banking on Values (GABV), a global network of banking organisations deeply committed to creating positive change in society as a whole. As a values-based business, we are a signatory to the GABV Kathmandu Pledge. This year, we were also the first bank in Australia to join the Climate League 2030 initiative and commit \$20 billion of Certified Responsible Investment products with zero fossil fuel investment by 2030. Using ethical, sustainable and socially responsible practices is something our members have come to expect and appreciate.

Being responsible and ethical are part of our core promise to members and society. In 2021, for the eighth year running, Teachers Mutual Bank Limited was named as one of the World's Most Ethical Companies by the Ethisphere Institute. This recognition honours superior achievements in transparency, integrity, ethics and compliance and underscores an honouree's commitment to leading with integrity and prioritising ethical business practices.

This year we also applied to become a B Corp. Certified B Corporations or 'B Corps' are businesses that balance purpose and profit. Globally, B Corps are leading the way in using business as a force for good.

Mapping our targets to the UN Sustainable Development Goals (SDGs)

We support the SDGs, which present a framework for sustainable business practices at the economic, social, and environmental levels, and set out a path to fight inequality and injustice, protect our planet, and end extreme poverty.

No matter how large or small, and regardless of their industry, all companies can contribute to the SDGs. While the scale and scope of the global goals is unprecedented, the fundamental ways in which businesses can contribute remain unchanged. The UN Global Compact asks companies to first do business responsibly and then pursue opportunities to solve societal challenges through business innovation and collaboration.

A total of 74 targets and KPIs measure our performance beyond the financials.

More information about our business is set out in our **2020-2021 Annual Report and Sustainability Update**.

Our Members & Products

. As a mutual bank, we are owned by and run for the benefit of our members. As our members own the organisation, there is no trade-off between shareholders and customers. Every member has one equal vote and one share in the business.

We primarily serve the Australian essential worker sector by providing banking and financial products and services to those individuals (and their family members) from across the teaching, tertiary education, firefighting / emergency and healthcare sectors. We are grounded in our communities and serve the real economy by primarily using member deposits to lend to other members.

Our members are Australian citizens or permanent residents of Australia. We focus on personal banking. We do not have any operations in foreign jurisdictions.

We are the only bank in Australia to have wholesale investments and retail mortgages and deposits certified as Responsible Investments by the Responsible Investment Association Australasia (RIAA), which are about 98% of all products that the Bank sells. Third-party verification means our credentials can be trusted. Our business strives to give consumers the opportunity to shop ethically for banking products. This year, our total certified product portfolio increased by 84% (\$3.8 billion) to \$8.3 billion. The breakdown of certified products on the balance sheet is 43% assets and 44% liabilities.

Our main products are basic deposit products (such as savings accounts, transaction accounts), non-cash payment products (such as cards) and loan products (such as home loans, personal loans and credit cards). We also provide telegraphic transfer and foreign exchange services to our members. In addition to our main products, we arrange for an independent company, Members Automotive Services Pty Ltd trading as Teachers Car Buying Service, to provide car buying services to members of Teachers Mutual Bank in NSW and ACT. We also arrange for the issuance of general insurance products, such as home and contents, car and caravan, as agent for Allianz Australia Insurance Limited; and life insurance products as agent for Zurich Australia Limited. Our subsidiaries, Tertiary Travel Service Pty Ltd and QT Travel Pty Ltd provide travel related services to members. Edsec Funding Trust No.1 is a funding vehicle to obtain liquid funds from the Reserve Bank of Australia.

Our Supply Chain

We procure a range of goods and services from a diverse supply chain comprising over 630 direct suppliers. Our supplier arrangements range from one-off purchases with non-contracted suppliers through to multi-year, large value strategic partnerships governed by master agreements. We recognise that each of these suppliers has their own complex web of supply chains.

Fostering strong relationships built on mutual respect is fundamental to our procurement strategy, and as such, we seek to ensure that we build long-term strategic relationships with our suppliers.

Our spend is managed in the following categories:



CUSTOMER ENGAGEMENT

Includes marketing and digital services, services supporting our products, digital channels, contact centres and car buying services.



CORPORATE SERVICES

Includes office services, logistics, supporting our property footprint, security, travel and entertainment, tools of trade and office supplies, training, recruitment and contingent workforce services and professional services.



TECHNOLOGY

Includes IT, payment processing, telecommunications, computer hardware and software, mobile and terrestrial telephone and data services.

Identifying our modern slavery risks

Modern slavery includes slavery, servitude, forced labour, forced marriage, the worst forms of child labour, debt bondage, deceptive recruiting for labour or services and human trafficking.

Our approach to human rights is embedded in how we do business. We are committed to respecting all human rights as outlined in the Universal Declaration of Human Rights and guided by the 2011 United Nations Guiding Principles on Business and Human Rights (UNGPs). The UNGPs outlines 'the corporate responsibility to respect human rights' and that business may cause, contribute or be directly involved with adverse human rights impacts as a result of business relationships in its value chain.

Our modern slavery risks

We acknowledge that there are risks of involvement in modern slavery across our operations and supply chain through our various roles.

- Employer – There is a risk that there could be exploited labour within indirect employment arrangements.
- Investor - There is a risk that we could invest in entities with links to modern slavery.
- Members - There is a risk that some members may use our products for activities that involve modern slavery. Members may transact to and from certain geographies or by facilitating investment in certain sectors. These could include linkages to modern slavery through entities that may use financial services to launder money derived from modern slavery. We acknowledge that we may also have members who are vulnerable persons subject to exploitation or exposed to modern slavery risk through personal or work circumstances.
- Partner and Sponsor – There is a risk that we could partner, support or donate financially or through advocacy to organisations involved in modern slavery.
- Purchaser of goods and services -There is a risk we could purchase goods or services involved in modern slavery in their creation or provision. This could be impacted by sourcing practices, engaging in one-off purchases and/or the use of non-contracted suppliers. In addition we acknowledge that risks in our supply chain may be higher where we procure goods and services that are manufactured in, or use raw materials from, industries and/or countries that are at a higher risk for modern slavery.

Our actions to address modern slavery risks

Supply Chain

In FY2021, we procured goods and services from 636 suppliers, ranging from very large, established corporates critical to our business operations, to those that provide us with low value, infrequent products and services.

To understand areas of potential modern slavery risk within our supply chain, we assessed our suppliers using our modern slavery risk assessment methodology. Our methodology is informed by global human rights indices, including the Global Slavery Index, and assesses suppliers against the risk factors indicated in the table below.

Risk factor	Detail
Country of Incorporation	Suppliers incorporated in countries associated with a higher risk of modern slavery practices.
Category of Supply	Suppliers of goods and services associated with higher rates of modern slavery being present. Within our supply chain, we have identified the following as high-risk categories: <ul style="list-style-type: none"> IT and electronic equipment where such goods may have been manufactured by another entity using minerals sourced or mined using forced labour. Cleaning of premises where personnel actually performing the service may be subject to debt bondage. Office consumables where the manufacture of office products such as paper may involve forced labour. Furniture, fixtures and fittings, which may be produced using forced labour or where workers are subject to poor labour practices. Supply of low cost merchandise which may occur in jurisdictions at high risk of modern slavery practices.
High Risk Business Models	Suppliers whose business models rely on sub-contracted or third-party labour which carries a higher risk of modern slavery.

Based on these risk factors, 48 direct suppliers were identified as having high potential for modern slavery being present either directly within their operations, or indirectly, within the extended supply chain. (75% of the spend was across the top 10 suppliers.)

Of these, we further prioritised suppliers based on the following principles:

- Leverage: suppliers where we have significant influence due to the level of spend or the length of the relationship.
- Direct: suppliers with whom we have a direct contractual relationship are prioritised over indirect relationships through the extended supply chain.

Using this methodology our cleaning and security services suppliers have been prioritised for further due diligence in FY2022.

Additional supplier due diligence will be conducted in future as we enhance our responsible sourcing program and commence implementation of actions to address gaps identified through the Responsible Sourcing Gap Analysis, as shown below.

In relation to the travel related services we provide, we are also aware of the association of international tourism and modern slavery practices specifically in orphanage and sex tourism and their supply chains. Tertiary Travel Service Pty Ltd and Q.T Travel Service Pty Ltd ceased all operations on 31 March 2021.

Case Study: Responsible Sourcing Gap Analysis

In FY2021, we engaged an independent third party to undertake a Responsible Sourcing Gap Analysis across our procurement operations. This analysis reviewed our current policies, systems and processes to identify gaps and opportunities for improvement in our approach to addressing social and environmental risks in our supply chain, including risk of modern slavery and adverse human rights impacts.

Through the analysis, several opportunities for improvement were identified, including:

- **Governance:** Strengthening the governance structure, and clearly defining accountabilities and responsibilities for managing sustainable procurement risks and opportunities, including managing modern slavery risks.
- **Policy:** Develop a standalone supplier Code of Conduct to communicate expectations to suppliers.
- **Risk Assessment:** Updating the existing, category-based risk assessment methodology for procurement activities.
- **Risk Management:** Updating and refining the risk management process and developing fit for purpose tools that enable procurers to manage risk throughout the procurement life cycle, from requirements specification to contract management.
- **Training:** Increasing capability through role specific training to accompany the existing online training module for those responsible for procurement activities.
- **Managing Grievances:** Ensuring that the grievance mechanism is clearly communicated to supply chain partners, and their employees.
- **Collaboration:** Leveraging best practice and maximising industry efforts by working collaboratively with industry peers, B Corp peers, suppliers, government and non-government organisations.

Due diligence in our supply chain

New and Existing Supplier Screening

We are aware of the risk of encountering modern slavery practices in our operations lies where we do not have direct management control and supervision. This may include contractors or suppliers who provide staff (for example, in cleaning, security or catering).

We have a Vendor Governance Framework (VGF) in place. The VGF establishes our process to identify, assess, manage, mitigate and report material corporate social responsibility (CSR) risks in our supply chain. All material, strategic and major suppliers are contractually required to complete a comprehensive Sustainability survey initially and then every two years to assist us in assessing supplier CSR risk. Processes such as screening, risk assessment and supplier due diligence both during

on-boarding and ongoing are continually reviewed and strengthened to ensure they remain as effective as possible in mitigating the risk of modern slavery practices in our supply chain.

We have screening technology, which screens entities against a global proprietary database of adverse media information. All suppliers are screened on a regular basis, ensuring that when/if new adverse information becomes available through the database we are made aware of that fact. In the event that a supplier is associated with an adverse media article, an alert is generated and further due diligence undertaken to assess impacts and appropriate mitigation actions are undertaken. All suppliers continue to be screened with no reportable concerns. All suppliers will be screened prior to on-boarding.

Addressing High and Medium Risk Suppliers

Where a supplier is identified as high or medium risk (due to their industry and geographic location), we undertake a due diligence process to understand how and if modern slavery risks are being managed by the supplier, which includes any/all of the following actions:

- Gathering and assessing publicly available information where available, including the suppliers policies and procedures
- If required, contacting suppliers directly to verify (where information is publicly available) or to request information on their approach to addressing modern slavery within their operations or supply chain.
- Inserting a modern slavery clause, where deemed necessary, on contract renegotiation or in new supplier contracts.

In the case of cleaning contractors we engage, we take steps to ensure that work is only undertaken by the contracted entity and is not further outsourced. This includes ensuring that the contracted entity has undertaken an occupational health and safety prequalification and has appropriate insurance, and that all staff engaged are employed directly (not through subcontractors, unless specialised services are required and we are made aware of this) and have appropriate rights to work within Australia. Where deemed necessary, we will also request proof of wage payments.

Risks and due diligence in our lending operations

We make sure environmental, social and governance (ESG) issues are embedded in our lending and investment practices, and written in our Treasury Credit Risk and Lending Risk Policy. This includes those that have a higher risk of exposure to modern slavery practices. We do not lend to, or invest in, sectors where the primary purpose of the entity or business is alcohol, armaments, correctional facilities, cryptocurrency, deforestation or gross environmental degradation, fossil fuels, gambling, military activities, political activities, pornography, slavery, tobacco or uranium. We also do not use member's deposits to directly lend to, buy equity or debt in, any large-scale greenhouse polluting activities from fossil fuel exploration, extraction, production and use.

Tackling financial crime

Modern slavery practices are crimes and the perpetrators are likely to seek to launder the proceeds through the financial system to legitimise them. We leverage intelligence, analytics, investigations and partnerships with other financial institutions and regulators to identify,

mitigate and deter financial crime. We have processes that analyse the types of activities that are likely to be indicative of modern slavery practices.

We are aware that child sexual exploitation (CSE) is among the worst forms of modern slavery and that this activity can involve victims and perpetrators in any jurisdiction including Australia. Payment for this activity takes a variety of forms. We have engaged with partner agencies to discuss current typologies thus enabling us to better profile and detect payments that may relate to CSE, and have implemented client transaction monitoring practices targeted specifically at this behaviour. We adhere strictly to our reporting obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* in order to enable law enforcement to take any action it deems necessary.

Raising awareness and training

We aim to empower our staff to identify, mitigate, manage and report on modern slavery risks in their roles. Training is delivered through of an online module as part of our work to build internal awareness and capability. This year training was completed by 139 people at all levels of management including executive leadership, as well as our Board. This training provides education on the various forms of modern slavery, the cost and impact on individuals, businesses and the wider community, business activities and industries where modern slavery practices are prevalent and provides practical examples on addressing modern slavery risks. The training also provides information on our obligations under the Act. Monitoring and reporting processes are in place to ensure timely completion of our training.

We aim to expand the modern slavery training provided in the next period, working with our training partner to acquire a revised training module specifically targeted at modern slavery risk management in the financial services industry.

Grievance mechanisms and remediation

We aim to identify, prevent, mitigate and account for our adverse human rights impacts. We are committed to providing for or cooperating in remedy when appropriate. We provide mechanisms through which grievances can be raised.

Concerns and instances in which modern slavery practices are occurring or is suspected, breaches in labour or human rights or non-compliance with our policies can be raised through our complaints and dispute resolution process or Whistle-blower Policy. Concerns may be raised through a variety of channels, including phone, email and in writing, with all mechanisms publicly available.

Our Whistle-blower Policy has been developed to protect those reporting and ensure that concerns can be raised without individuals being subject to victimisation, harassment or discrimination. We are committed to ensuring that concerns are assessed in a timely manner, and addressed fairly and confidentially, in line with our policy.

Policies and Frameworks

Conducting business ethically and responsibly is fundamental to how we operate. Our behaviour is underpinned by our values, which includes our commitment to ethical business. Policies and processes which outline our expectations include:

Policy / Process Document	Purpose
AML – CTF Program	Sets out how we comply with our legislative obligations for anti-money laundering and counter-terrorism financing.
Code of Conduct	Outlines our commitment to treat others with respect, dignity and fairness, and ensuring a safe and healthy work environment for all employees, contractors, visitors, members and customers.
Complaints and Dispute Resolution Policy	Outlines our approach to complaints handling. We are committed to working with complainants to understand their issue and providing an appropriate outcome.
Corporate Social Responsibility Policy	Outlines our approach to ethical business and social responsibility practice and how we deliver on our responsibilities and commitments. It includes our commitment to respecting human rights, and specifically the rights of our employees, our members, and our communities.
Customer Owned Banking Code of Conduct	Sets standards of good practice for customer owned banks.
Human Resources Policy	Governs employment and personnel matters, including our commitment to ensuring appropriate remuneration and benefits for employees and contractors, and providing a workplace free of discrimination and harassment.
Vendor Governance Framework	Outlines the monitoring procedures used to manage operational risk associated with third party arrangements.
Vulnerable Persons Policy	Outlines our approach to supporting vulnerable persons.
Whistle-blower Policy	Outlines our approach to the reporting of unethical, corrupt, illegal or undesirable conduct and to ensure that those who do report can do so safely, securely and with confidence that they will be protected and supported by us.

Governance

Our Board has ultimate oversight over our actions to address the risk of modern slavery practices within our business and our partnerships with suppliers. The Board approves and fosters an appropriate corporate culture consistent with our values. The Board Risk Committee, a subcommittee of the Board, monitors and reports on our progress in tackling modern slavery practices in our operations. Day-to-day responsibility and execution of actions, such as engaging with new suppliers and ensuring adherence to our policies and procedures, is led by our management team.

Risk Management Framework

A 'Three Lines of Assurance' (3LOA) model has been adopted to actively manage risks. The Risk Appetite Statement is cascaded throughout the business, is monitored and reported within the 3LOA model which is described as:

- (1) Line 1 Business management – the primary area responsible for risk management. It lies with the business – the area where the risks are generated and managed
- (2) Line 2 Risk Management – responsible for risk advice, control and challenge. It provides the analytical insight, oversight and challenge, and assurance that business decisions reflect the Board's risk appetite and
- (3) Line 3 Internal Audit function - providing independent review and assurance

The Bank's Risk Management Framework illustrates the structure within which the Bank identifies, measures, evaluates, monitors and reports risk.

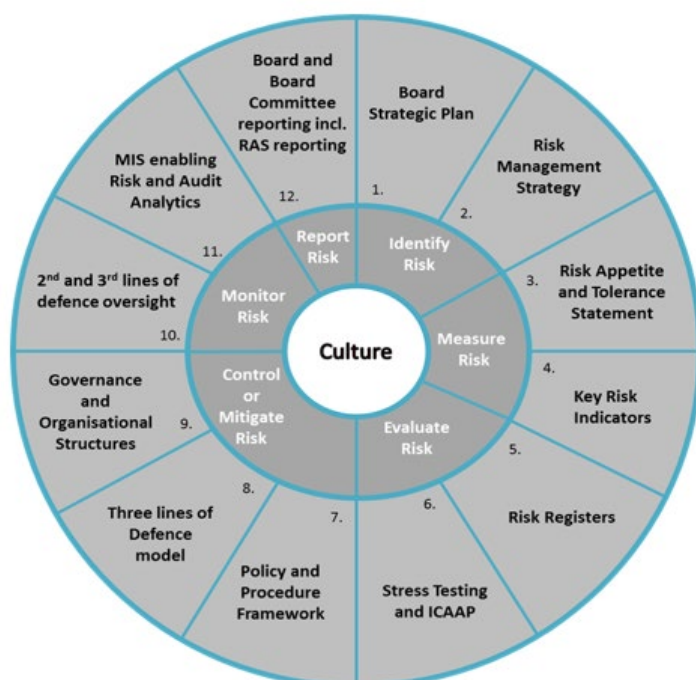


Figure 1: Risk Management Framework

The impact of COVID-19

During the past year there have been significant and unprecedented challenges caused by COVID-19. Our response focussed on keeping our people safe while supporting our members and our business partners including our suppliers.

This has included the majority of staff working from home for significant periods throughout the year, enforcing social distancing and segregation to avoid any potential disruptions to our services.

One of the vital goals for the Bank was to maintain the connection with our people while we worked from home. We established a strong workplace community online, including regular updates from the Crisis Management Team about the evolving situation. We also encouraged attendance at wellbeing seminars on topics such as resilience, ways to take care of your mental health and promoting exercise.

To assist our Members experiencing vulnerability, we have provided practical financial support. This year, our Financial Hardship program has helped nearly 400 Members to navigate their changing circumstances. As we move through the challenges of the pandemic, we have a responsibility as a credit provider to be as supportive as possible, and clearly explain the options available to our Members. To do this, we developed supporting materials and guidance to help them make informed choices. Since March 2021, the majority of our Members on Repayment Pause have successfully resumed their loan repayments without any foreclosures.

We maintained an open dialogue with our suppliers and a commitment to strong long-term relationships throughout.

While we may not have come as far as we thought with some initiatives we have not lost our focus on identifying, managing and mitigating the specific risks of modern slavery in our operations and supply chain.

Assessing the effectiveness of our actions

We are committed to continually improving our approach to modern slavery and advancing human rights. We acknowledge that measures of effectiveness are critical to assist in informing appropriate actions to address our risks.

Following the independent third party Responsible Sourcing Gap Analysis an improvement plan is in development which will strengthen the foundations of our modern slavery risk management. This will include a suite of metrics to measure performance for the next reporting period.

Progress on commitments

We aim to continually improve our approach to advancing human rights and to monitor progress against our FY21 commitments and have identified priorities for FY22.

- Green - Complete
- Amber - Partially complete
- Blue - New for F22

Commitments	Status	Comment
Undertake an industry and best practice modern slavery benchmarking assessment, to identify gaps and opportunities to improve performance	●	Continue in FY22 – An Responsible Sourcing Gap Analysis commenced in FY21. A report outlining recommendations will be delivered and an improvement plan will be developed to strengthen the foundations of our modern slavery risk management.
Continue to evolve our approach to addressing modern slavery and human rights through the development of a framework and implementation roadmap, using the inputs of the benchmarking assessment to inform future actions. This will also include a review of our key performance indicators	●	Continue in FY22 – An improvement plan and metrics will be implemented for the next reporting period.
Evolve our governance framework by ensuring accountabilities and responsibilities for modern slavery risk and actions are clearly assigned and understood within the organisation, including at Board, Executive Leadership Team and Board Committee levels	●	Complete – Key accountability assigned to Chief Digital Bank Officer. 139 people at all levels of management including executive leadership, and Board completed training.
Establish a working group to continue the development of our organisational capability in the management of risks of modern slavery practices	●	Continue in FY22 – Working group established in FY21. Working group to be expanded in FY22.
Ensure adequate resources are assigned to modern slavery risk management and operations	●	Continue in FY22 – Key accountability assigned to Chief Digital Bank Officer. Resource allocation to be reviewed in FY22.
Develop a Supplier Code of Conduct, outlining our expectations of suppliers in regards to corporate social responsibility, human rights and eradication of modern slavery practices considerations	●	Continue in FY22 – A Supplier Code of Conduct was drafted and will be implemented in FY22.
Ensure existing policies, including Code of Conduct, Human Resources Policy and Corporate Social Responsibility Policy appropriately reference our position on human rights consistent with the Universal Declaration of Human Rights. Ensure that, where possible, these policies apply to all	●	Continue in FY22 – Corporate Social Responsibility (CSR) Policy updated. Further policy reviews to be completed and finalised in FY22.

employees and upstream and downstream business partners, including contractors, suppliers, clients and investee companies.		
Finalise, publish and implement the revised Vendor Governance Framework	●	Continue in FY22 – The Vendor Governance Framework was reviewed as part of the Responsible Sourcing Gap Analysis and will be revised and implemented in FY22.
Supply chain risk assessment for modern slavery risk in FY21	●	Complete – supply chain risk assessment completed. No cases of modern slavery were identified or remediated in FY21.
Review and refine our risk assessment methodology in line with industry practice to ensure we remain informed in relation to the risk posed by its suppliers and clients	●	Continue in FY22 – Our risk assessment methodology was reviewed as part of the Responsible Sourcing Gap Analysis and will be updated in FY22.
Review existing controls to ensure adequacy in assessing all business activities (operations, lending and supply chain) for modern slavery risks, focusing on activities where we may directly cause or contribute to modern slavery practices. Revise and update where required	●	Continue in FY22 – Our existing controls were reviewed as part of the Responsible Sourcing Gap Analysis and will be updated in FY22.
Ensure the existing grievance mechanisms are communicated to business partners as a way of reporting instances or suspicions of modern slavery or human rights abuses. Ensure that these mechanisms are available in multiple languages	●	Continue in FY22 – existing grievance mechanisms to be communicated to business partners in FY22.
Develop a remediation methodology outlining the process for addressing verified incidences of modern slavery, ensuring that the approach puts victims first	●	Continue in FY22 – remediation methodology to be developed in FY22.
Work with our training partner to acquire a revised training module specifically targeted at modern slavery risk management in the financial services industry, to be rolled out to all staff involved with procurement and dealing with suppliers	●	Continue in FY22 – industry specific training module to be sourced in FY22.
Undertake a training needs analysis to understand requirements for general and specialised training for particular departments. Develop an overall training approach	●	Continue in FY22 – Learning and Development to perform training needs analysis and to develop overall training approach in FY22.
Identify opportunities to collaborate with peers and business partners through formal and informal multi-stakeholder initiatives, and industry bodies	●	Continue in FY22 – TMBL explored opportunities with Sedex, Fair Supply, and Point Advisory. TMBL will participate in the Responsible Investment Association Australasia (RIAA) Human Rights Working

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		Group and will continue to look for further opportunities to engage and collaborate.
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Appendix 1: Overview of reporting entities

Teachers Mutual Bank Limited is the ultimate parent company and its controlled entities are Q.T Travel Pty Ltd (ABN 63 010 167 503), Tertiary Travel Service Pty Ltd trading as Tertiary Travel (ABN 28 008 900 981) and Edsec Funding Trust No 1.

Tertiary Travel Service Pty Ltd and Q.T Travel Service Pty Ltd ceased all operations on 31 March 2021. Any suppliers contracted to Teachers Mutual Bank Limited will continue to be assessed and managed as normal. All other suppliers will cease to have a relationship with Teachers Mutual Bank Limited. The Edsec Trust No1 is a wholly owned securitisation vehicle and has no dedicated staff or suppliers.

Appendix 2: Australian Modern Slavery Act Mandatory Criteria

This Statement was prepared to meet the mandatory reporting criteria set out under the Australian Modern Slavery Act. The table below identifies where each criterion is addressed within this statement.

Australian Modern Slavery Act mandatory criteria	This statement
Identify the reporting entity.	About this statement (page 2)
Describe its structure, operations and supply chains.	Our structure, operations and supply chain (page 5)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Identifying our modern slavery risks (page 8)
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.	Our actions to address modern slavery risks (page 9) Grievance mechanisms and remediation (page 12)
Describe how the reporting entity assesses the effectiveness of these actions being taken to assess and address modern slavery risks.	Assessing the effectiveness of our actions (page 15)
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).	Appendix 1 Overview of reporting entities (page 19)
Any other relevant information.	Message from the Chair & CEO (page 4) Progress on commitments (page 16)