

Modern Slavery Statement

For the period 1 July 2020 to 30 June 2021



Table of Contents

Introduction	3
About us	4
Risks of Modern Slavery	6
Assessing Aware Super's modern slavery risk	8
Assessing the effectiveness of actions	12
Other information	12
Approval	12
Appendix A	13

This Modern Slavery Statement is prepared and issued by Aware Super Pty Ltd ABN 11 118 202 672 ("Trustee") as Trustee for Aware Super ABN 53 226 460 365 ("Fund"). This Statement for the financial year ending 30 June 2021 has been prepared in accordance with the Commonwealth Modern Slavery Act 2018 (the Act) and approved by the Aware Super Board. Reporting from the Fund's controlled entities set out in Appendix A have been included in this Statement. The Fund and the Trustee are referred to throughout the document as 'Aware Super', 'We', 'us' or 'Our'.

Introduction

Modern slavery occurs in every region of the world. The International Labour Organisation estimated that on any given day in 2016 there were 40.3 million victims of modern slavery globally. Of those, 24.9 million people were estimated to be victims of forced labour, including 16 million in the private economy.

While there is no globally agreed definition of 'modern slavery', the term is widely used to cover a range of practices that use coercion, threats, violence or the abuse of power to exploit and deprive people of their freedom. The Act, identifies the following practices as being types of modern slavery:

- trafficking in persons
- slavery
- servitude
- forced marriage
- forced labour
- debt bondage
- deceptive recruiting for labour or services
- the worst forms of child labour (situations where children are subjected to slavery or similar practices or engaged in hazardous work)

The Walk Free Foundation's 2018 Global Slavery Index estimates that in 2018 there were 15,000 people living in Australia in modern slavery. There is also an unquantifiable number of modern slavery victims working in the supply chains of Australian companies around the world.

Aware Super believes that respect for human rights is strongly associated with value chain resilience and a stable business operating environment. In parallel, Aware Super is increasingly aware of and concerned about the significant operational, financial, legal, and reputational risks portfolio companies may face when they fail to manage human rights risks. These business risks include potential project delays and cancellations, lawsuits and other legal risks such as non-compliance with emerging human rights-related regulations, scrutiny from national level grievance mechanisms such as OECD National Contact Points, significant fines, productivity and recruitment challenges, and negative press coverage. Aware Super is mindful of the need to assess and act upon longer-term risks such as human rights risks in making and managing investments on behalf of our members.

At the same time, Aware Super, along with other institutional investors is now more exposed to human rights risks than ever. This is a result of the rapid expansion of investment capital and shareholder corporate ownership structures in recent decades, the increasing globalisation of business and investment accompanied by the expansion of investment value chains to countries far from where investors are headquartered, and the rapid development of technology exposing individuals and societies to new and previously unforeseen risks.

As an organisation and an institutional investor, we have a responsibility to respect human rights in line with the UN Guiding Principles on Business in Human Rights. These UN Guiding Principles were unanimously endorsed by the United Nations (UN) Human Rights Council in 2011 and represent the authoritative global framework for addressing business impacts on human rights. The framework clarifies the respective duties and responsibilities of governments and businesses in tackling human rights risks related to business activities.

Aware Super has an obligation to produce a modern slavery statement under the Commonwealth's Modern Slavery Act 2018. Our modern slavery statement is the first step in what will be a yearly assessment of our operations (including investments) and supply chains to identify our exposure to modern slavery risk. In this context, we recognise that risk means the potential that Aware Super will cause, contribute to, or be directly linked to modern slavery through our operations and supply chains. While the reputational risk or financial risk to Aware Super intersects with risk to people in the context of modern slavery reporting, it is a secondary consideration. This year we have focussed on major suppliers that we have analysed as presenting the most risk, and our investment managers. In future we will expand our approach.

About us

We are one of Australia's largest superannuation funds managing over \$148 billion¹ in savings for more than 1.1 million members. We are committed to helping our members achieve their best possible retirement and are the super fund for any Australian who values community.

We were established in 1992, when we were known as First State Super. In 2020, we merged with VicSuper and WA Super, and became known as Aware Super. We continue to remain committed to our purpose of being a 'force for good'.

Together, we can make an enormous difference to our members and the community at large. Our scale and expertise enable us to do well for our members as one of Australia's top performing superannuation funds² and at the same time, do good for all. Our products, services, education, and advice combined, provide a quality member experience and work together to deliver even better retirement outcomes. Our investment approach is committed to shaping the best outcomes for all stakeholders and delivering positive financial and societal outcomes.

What makes us different

Scale and expertise

Our scale and expertise enable us to continue to aim to deliver strong returns, low fees and enhanced member services, including advice and insurance.

Members first approach

We are proudly a profit to member fund. Everything we do is for the benefit of our members, from our products and services, to advocating on behalf of member's best interests.

Investment track record

We have consistently delivered strong long-term outcomes for our members, while continuing to do good for the broader community.

Commitment to responsible investing

We invest to make a positive difference. We actively seek investments that are not only sustainable but deliver value to the communities in which our members live.

Doing well and making a positive difference to our members by

- being one of Australia's best performing super funds with top 10 performance over 3, 5 and 10 years²
- being recognised as Money Magazine's Best Super Fund 2021³ delivering an average annual return of over 9.80% over five years⁴

- our fees are competitive⁵
- empowering our members through quality education, guidance and advice, online, over the phone or face to face
- driving better investment outcomes by being an active and responsible owner
- making investments that benefit the community, economy and broader society
- acting on issues that impact the sustainability of returns - including climate change

The values that inspire us to put members first

Every day our values guide us in the work we do for our members and embody what we believe in, motivate us and guide our decisions, actions and behaviours.



Members first

Our members are the spirit and heart of our organisation. They're our reason for being.

Deliver honourably

We're united, and trusted, and we operate with the highest integrity. We take ownership and we're focused on delivering high quality outcomes for our members.

Care deeply

We care deeply about our people, our members, and our stakeholders. We're inclusive, open and transparent.

Lead bravely

We step forward. We lead. We're focused on continuous improvement, efficiency and simplicity in everything we do.

1 As at 30 June 2021.

2 Returns for the Aware Super Accumulation Growth option were in the top 10 performing super funds for the 3 (49 funds), 5 (49 funds) and 10 (33 funds) year periods ending 30 June 2021, SuperRatings Fund Crediting Rate Survey (SR50 MySuper Index).

3 We have been awarded Best Super Fund 2021 by Money Magazine.

4 Returns for the Aware Super Accumulation Growth option were an average of 9.80% per annum for the 5 year period ending 30 June 2021. SuperRatings Fund Crediting Rate Survey (SR50 MySuper Index) June 2021.

5 The total annual fee (inclusive of admin and investment fees) for our Accumulation Growth option is 1.04% pa the overall average is 1.35% pa Chant West Super Fund Fee Survey, June 2021, based on a \$50,000 balance in a Growth option.

Organisational structure, operations and supply chains

Aware Super is a public offer superannuation fund domiciled in Australia, employing over 1,300 staff in 44 locations throughout Australia.

Our head office is located at Level 28, 388 George Street, Sydney and we have significant offices in Melbourne, Brisbane and Perth.

Structure

As a superannuation fund, the Fund is structured as a trust. The Trustee is an Australian proprietary company.

The controlled entities of the Fund are set out in Appendix A. These controlled entities typically are passive entities set up for the holding of various investments of the Fund and do not have physical operations. Given the nature of these types of entities, Aware Super's policies and procedures typically govern these entities.

Brand names

Aware Super operates under the brand 'Aware Super' and 'VicSuper'. Prior to September 2020, Aware Super operated under two brands, 'First State Super' and 'StatePlus'.

Supply Chain

Aware Super has a vast range of supply chains globally, of which most have headquarters in Australia, United States of America, United Kingdom and across Europe.

A large proportion of engagements are covered across 1 to 3-year contractual engagements where we procure services and or products. Strategic or bespoke solutions are typically longer-term commitments. In general, we find most of our supplier base tend to be a minimum of 1-year engagements.

Goods and services are procured to support Aware Super's operations, which include, but are not limited to;

- Technology products (including software, hardware, PaaS, SaaS and associated maintenance)
- Business applications (including bespoke business solutions, government and industry subscriptions)
- Services (including administration, professional cleaning, marketing and digital, legal, financial, catering, postal, advisory)
- Workplace (including commercial leasing, stationery, perishables, utilities)

The services procured cover Aware Super, while a large portion of spend and services are technology natured.

More information on Aware Super's material suppliers can be found on our website at: [aware.com.au/servicepartners](https://www.aware.com.au/servicepartners)

Operations

Aware Super's operations include:

- Issuing superannuation products
- Providing financial advice
- Making *financial investments*

Investments

Given our purpose, we have a large investment portfolio for the benefit of our members. Our investment portfolio spans Australian and international equity markets, property, infrastructure and private equity investments. We invest in more than 30 countries. We have investments across a number of sectors including energy, IT, materials, financial services, property, healthcare and telecommunications. We have mandates with external investment managers to manage 80% of our investment activity. Further information on our approach to investing is set out in our Annual Report and Product Disclosure Statements.

We have also sought to understand geographic and sector risk in relation to our investments. In the first instance we have done this by comparing our investments with geographies or sectors known to be of greater risk. We have focused on our investments in high risk geographies and high risk sectors. Where we have investments in those high risk geographies or sectors, we believe the risk to people may be greater. We have also asked our investment managers to report back to us with the relevant information on our externally managed investments. Risks of modern slavery practices in our operations and supply chains.

Risks of Modern Slavery

At Aware Super, we take the risk of modern slavery seriously and we are determined that we will not play a role in perpetuating modern slavery. Nonetheless, sadly forced labour and related practices likely exist in the operations or supply chains of most businesses and in every region of the world.

Corporate

We initially identified areas of greatest risk in our operations and supply chains. Research suggests that high risk areas for financial services businesses' supply chains include IT procurement, logistics and property, and building services such as facilities management, utilities, cleaning, waste management and security and print and promotional goods. Accordingly, we have focused on these areas.

A questionnaire was designed by Aware Super to help us understand if our suppliers are using high risk regions for the supply or sourcing of goods. Using the responses received from suppliers, we measured the perceived inherent risk and then assessed a residual risk. We then mapped the location of suppliers. Aware Super did not capture supplier's source countries outside of high-risk regions, although this is under consideration for future reporting periods.

We are conscious that there could be risks of modern slavery present in our supply chain, specifically related to the supply chains of our technology electronics suppliers. In order to manage these risks, we only work with reputable technology suppliers and brands. We have also completed assessments on these organisations in order to have a level of transparency and comfort around policies and controls that they have incorporated into their organisation. The longer-term view is to then extend this reporting into their supply chains.

To manage modern slavery due diligence on an on-going basis, when onboarding new suppliers, Aware Super assesses if relevant contract terms are required or present and questionnaire's are completed based on a modern slavery risk profile.

Investments

We have mapped our investment portfolio to establish a baseline for identifying risk. As at 30 June 2021 we have approximately \$148 billion invested, across numerous countries and sectors. In some instances, we hold as little as 0.0001% and as great as 100% of the investment. Across high-risk geographies and high-risk sectors we recognise that the risk of modern slavery is generally greater and we are therefore prioritising our action accordingly.

Human rights risk analysis forms part of our process for integration of environment, social and governance factors in our investment process. Our risk processes include analysis by sector and geography, using a wide variety of resources, such as external research and indices.

We have worked with one of our ESG data providers, ISS to develop a Modern Slavery screen for our Australian listed equities portfolio. The purpose of this screen is to identify companies with higher risk of Modern Slavery so we can prioritise them for engagement or follow up with our investment managers. The lead indicators are based on the geographic location of the company and its supply chain as well as its industry; we also screen for companies with historic or ongoing labour controversies. In addition to these indicators, we have incorporated ISS' custom Modern Slavery score.

A Modern Slavery due diligence questionnaire was sent to 97 external fund managers in 2020. Our initial assessment has identified a number of 'high risk' managers that we will prioritise to engage with on their operations, portfolio and process. We assessed both their corporate operations and investments. From an investment perspective our risk assessment focussed on country exposure; sector exposure and what (if any) engagement approach was in place with the managers. Approximately 20 managers were identified as medium to high risk and the majority of these were in our International equities or Private equity sector. From a corporate operations perspective approximately 30% of our managers were identified as high risk mainly due to one of our assessment criteria being whether they produced a Modern Slavery Statement. We continue to engage with our managers on both their corporate activities and investment approach to improve their approach to identifying and assessing modern slavery risks.

Human Resources

The People & Workplace (HR) department at Aware Super is responsible for defining and overseeing the frameworks, behaviours and practices that ensure that the people who work for us – prospective, current and former – are treated with respect, fairness and according to all relevant legislation.

Amongst other things, this is articulated in our employment instruments, employment contracts, policies and our benefits. As we work for an organisation that is constantly growing, in an industry that is constantly evolving, these are all regularly reviewed and are subject to robust governance processes which constantly strive to expand our due diligence and remediation efforts in assessing and addressing any internal modern slavery risks. Our HR Policy Framework is the core mechanism for ensuring that we address any modern slavery risks and this is subject to regular scrutiny – from our HR team all the way through to our Board of Directors.

All employees at Aware Super are entitled to their rights as per their respective employment instruments, underpinned by any awards, the National Employment Standards and all relevant employment legislation. The HR team contains specific capability around employee relations; industrial relations; and employee rights and also uses external experts where needed to ensure Aware Super upholds its high standards around managing any risk of this kind.

Aware Super also strongly supports equity, diversity and inclusion (EDI) of its workforce and has a Board-approved EDI strategy. This recognises the diversity of our workforce, strength comes from this diversity and that an inclusive culture that celebrates and leverages this diversity through inclusive practices is best placed to serve our members. This includes ensuring that bias does not impact any of our people decisions and this is supported by leadership and management training and role-modelling from our most senior leaders.

Aware Super always aims to do the right thing and has identified some potential risks which could exist in people processes that may affect our employees. Following is a list of non-exhaustive modern slavery risks which we aim to eradicate:

- Forced/bonded labour
- Unfair recruitment practices
- Dangerous or substandard working conditions
- Underpayments
- Unfair or excessive hours of work
- Bullying, discrimination and harassment
- Not providing contracts of employment
- Deceptions regarding conditions of employment
- Suppressing employee rights and entitlements

We are committed to taking action to address modern slavery risk that might exist in our people processes and approaches. Some of the actions we are taking is set in the next section.

Assessing Aware Super's modern slavery risk

The following aspects of our governance framework are also relevant to our commitment to human rights:

- Our Code of Conduct requires each person working for the Fund to respect and work to uphold human rights.
- Our employee training covers the identification of human rights related risk and how employees can report suspected breaches of our requirements.
- Employees are encouraged to use our employee hotline, which allows anonymous disclosure.
- Reports from our employee hotline are collated and reported to the board.

Corporate

A project was established in order to create a baseline of suppliers that we could target and actively track. An extract of our accounts payable data against suppliers was cleansed and assessed against types of services that each organisation provides to Aware Super. Suppliers were then categorised into Tiers, where Tier 1 (typically material suppliers) and Tier 2 were identified. This was used to target the first level of assessment conducted.

The approach taken by Aware Super was to ensure that our material suppliers were assessed in the first instance to identify and target any potential high-risk suppliers.

Once categorised we applied an inherent rating based on information on the organisation, type of services provided, location of services, plans to offshore and any negative media that we could locate on modern slavery risks against suppliers.

A survey was created that was sent out to all Tier 1 and Tier 2 targeted suppliers with specific questions around:

- type of services or manufacturing;
- if supplier outsources or manufactures within any high-risk countries listed in order to provide service or product;
- the type of policies in place targeting modern slavery in their supply chain;
- training provided to employees on modern slavery and human trafficking in supply chains;
- types of due diligence that the organisation places on their supply chain to address modern slavery;
- any offshore activities to any countries not listed as high risk.

Once the responses were received, we ran feedback through a tool created in order to provide a residual rating against suppliers. A rating of red, amber, green has been created based on scoring for easier categorisation. Information about the services provided was also captured and held centrally.

Any "red rated" residual ratings that we have identified, will feed into in our risk management system to allocate to a business owner and make the business aware of the potential modern slavery risks identified.

If a red rated supplier is identified, our Procurement team will work with the supplier and business owner in order to get a clear understanding of the supplier's processes and what strategy the supplier has to eliminate any modern slavery risks within their organisation. Aware Super should be able to gain comfort in continuing to do business with a supplier, and or educate a supplier where possible and assess if there are identified controls in place. An ongoing assessment will be required for a decision on the ongoing relationship with a supplier if modern slavery is a concern.

This project work was established to initiate a baseline position of which 900 suppliers were identified. 125 have been screened and we are targeting 155 by May 2022 to take through the process. We have continued this process in a business as usual function as we on-board new suppliers. We will continue to do a retrospective assessment on our current supply base in order to achieve the target in the next annual reporting period.

An ongoing review has been established to re-assess suppliers. Frequency will be based on the supplier tier and will occur as an annual or biannual assessment.

Investments

In our investment activity, due diligence policies and processes have been put in place to require through assessment prior to investing. The Fund's controlled entities which hold the Fund's investments are subject to these same policies and procedures. We have also undertaken a review of our existing managers in line with this due diligence process and will monitor our investments managers as required and based on their responses.

We are signatories to the Australian Asset Owner Stewardship Code. We disclose against the provisions of the Code, which includes providing an overview of how we discharge our stewardship responsibilities, links to our policies, and our approach to engagement with our investee companies.

Our investment portfolio includes investments in equities across the world. In respect of Australian equities, we are members of the Australian Council of Superannuation Investors (ACSI). ACSI undertakes a year-round program of research, engagement, advocacy and voting advice in relation to companies in the ASX300. ACSI seeks to influence companies through constructive engagement with their boards about material ESG issues, with the aim of promoting long term shareholder value and minimising risk. ACSI encourages listed companies to consider their practices as they relate to human rights, including actively engaging with employees, customers, supply chains and other relevant stakeholders to understand and assess human-rights impacts. ACSI's engagement program includes human rights in supply chains and sustainability reporting disclosure.

We have identified that our investments in high risk jurisdictions and sectors have a greater risk of modern slavery. Accordingly, we have prioritised these investments and investment managers

investing in these high risks areas for further action. We have identified a program of engagement with fund managers and investee companies, so we can further understand the level of risk, and identify any action required.

In respect of international equities, Federated Hermes Eos is our engagement provider. Federated Hermes Eos currently have an engagement theme focussed on Human and Labour Rights. Human and labour rights underpin a company's wider corporate culture, business ethics and enterprise risk management, which affect a company's reputation and the ability to create and preserve value over the long term. Changes in regulations and government policies, such as the UK Modern Slavery Act and the Dutch child labour due diligence law have set new minimum levels of obligation for companies to identify and report how they manage these risks. In addition, the UN Guiding Principles on Business and Human Rights set out international guidelines covering the identification of salient human rights in company operations and supply chains and the range of actions to consider in order to respect and, where necessary remedy, human rights abuses.

Federated Hermes Eos on our behalf engage on critical human rights issues including eradicating forced labour and child labour in supply chains, promoting access to medicine and nutrition, and protecting the rights of indigenous people. Ignoring such issues can lead to financial, reputational and legal risks for companies, and in the worst cases can limit a company's social licence to operate.

No sector's supply chain or geography can be considered safe, although some are riskier than others, such as consumer goods, agriculture and fishing, construction, logistics and hospitality. Migrant workers are particularly vulnerable to exploitation, even in mature economies.

In recent years investors have gone beyond simply expecting companies to disclose their human rights policy. Now they are seeking more robust due diligence and assessment in line with the UN Guiding Principles on Business and Human Rights.

These require companies to do more than meet minimum legal standards, through the consideration of all salient human rights connected to their business and supply chain. Federated Hermes Eos also use the UN Sustainable Development Goals (SDGs) as a framework to engage with companies and policymakers in areas such as access to medicine and nutrition, inequality, decent work and strong institutions.

To further strengthen our engagement activities with companies Aware Super is a founding member of IAST – APAC (Investors Against Slavery and Trafficking – Asia Pacific) which was launched in 2020 as an investor initiative to promote effective action by companies to find, fix and prevent modern slavery, labour exploitation and human trafficking across the value chain. IAST APAC currently represents AU\$7.6 trillion (US\$5.7 trillion) in funds under management across 33 members in June 2021.

The initiative is divided into two work streams. The first work stream centres on an investor statement on modern slavery. This statement outlines investors' expectations and encourages companies to go over and beyond the legal requirements of the Modern Slavery Act. It also suggests and encourages companies to take a number of specific actions based on best practice to combat slavery effectively. The investor statement was initially sent to all the companies listed in the ASX100 in

late 2020. Of the responses, 33% acknowledged the investor statement - and, in the majority of those responses, companies welcomed further engagement with the initiative. In 2021, in conjunction with the end of the Australian Financial Year deadline for the reporting requirement under the Modern Slavery Act and widespread evidence of increased risk of modern slavery globally in the wake of the Covid pandemic, an updated investor letter was sent to the ASX100 companies that did not reply and to the remaining 100 companies listed in the ASX200.

Many of the specific points raised in the investor statement are linked to the second work stream, which focuses on engagements with specific companies. Twenty-three companies were selected from four sectors – Consumer Discretionary, Consumer Staples, Technology, and Healthcare – as engagement priorities. Work has begun on those engagements, including establishment of engagement plans with specific objectives and milestone targets – and, in some cases, engagement with the companies has started. In addition, a number of workshops were held for members, including sharing best practice on engagement and key priorities for engagement reports. Looking ahead, investors will be using the engagement plans for multi-year engagements with the selected companies and continue to share knowledge and best practice. It is envisaged that the work under this work stream can also assist members to address the mandatory criteria of measuring the effectiveness of actions taken, under the Modern Slavery Act, by tracking progress against the engagement plan.

IAST-APAC is strongly focused on industry collaboration - in the spirit of the Modern Slavery Act - including shared knowledge and tools to address risk, taking inspiration from the investor initiative 'Find it, Fix it, Prevent it' in the UK. It also engages with civil society, including Walk Free and FAST as well as investor briefings on specific risks by labour rights experts.

We have reviewed and discussed the modern slavery reports of the Australian listed companies we invest in. As part of our research agenda, through ACSI we commissioned and released new **research** to analyse these reports which will enable us to better understand where risks have been found, and to conduct engagement with companies on the maturity of their reporting.

We have met with 35 companies directly and initiated engagement with a number of companies as part of the collaborative engagement working group. The core questions that engagement aims to address are:

- Find It: 'Have you found modern slavery in your operations or supply chain?' and 'If not, can you demonstrate that you have rigorous processes in place to look for it?'
- Fix It: 'If so, can you demonstrate the steps you have taken to improve the lives of victims?'
- Prevent It: 'Have you effectively reported your actions and the steps taken to prevent a re-occurrence?'

We will continue to assess the effectiveness of our actions and from there, identify future actions for prioritisation. Further information on how we assess the effectiveness of our actions is set out below. We intend to focus on embedding our standards consistently across our operations and supply chains, as well as improving our ability to identify, manage, address and remediate modern slavery risks and impacts.

Human Resources

We aim to eliminate the risks of modern slavery through robust practices via the following policies and procedures:

Code of Conduct

Our Code of Conduct sets the ground rules for how all our people are expected to behave and interact with each other and our members, suppliers, community and stakeholders. The Code provides guidance for ethical decision making and a framework for resolving challenges as they arise. It sets out our work ethos and highlights fundamental requirements with respect to workers' rights. It also promotes honesty, integrity, and the requirement to act with care and diligence.

All our people are responsible for knowing and following the policy requirements that apply to their jobs and for reporting any suspected breaches of law or our Code. Our executives and managers are accountable for creating and fostering a work environment that encourages ethical behaviour and compliance. Employees are encouraged to discuss such issues with the Chair, the Chief Executive Officer (CEO), their managers or their peers as appropriate.

Recruitment Policy

Aware Super strongly condemns and is against the use of unfair practices while hiring and employing staff. Aware Super's recruitment policy mitigates the risks of modern slavery from occurring in our business.

Aware Super is an Equal Opportunity Employer and has a standard and consistent approach to the recruitment and selection of employees to ensure that every suitably qualified applicant is provided with an equal opportunity to obtain employment with the company.

Employment is freely chosen. The use of forced, bonded or involuntary labour is prohibited. Workers are not permitted or encouraged to incur debt through recruitment fees, fines or other means.

Workers are not required to lodge deposits or their identity papers with us and are free to leave after providing notice as per their contract of employment.

All employees receive a contract or agreement and are given the chance to read through it thoroughly. It outlines their remuneration, when and how often you will be paid, any penalty rates or allowances they are entitled to and how much notice they need to give if they wish to terminate their employment.

Due Diligence Policy

This policy ensures that the appropriate employee screening checks are completed as required.

All employees undergo background checks prior to being hired. Aware Super only hires people who have an entitlement to work in Australia.

The screening checks will not be used to discriminate on the basis of race, colour, national origin, ancestry, religious belief or activity, gender, disability/impairment, age, sexual orientation or any other prohibited ground as set out in the relevant equal opportunity and anti-discrimination legislation.

Workplace Behaviours Policy

Aware Super has a zero-tolerance policy for any behaviour that impacts the mental health and safety of its employees, including bullying and harassment of any nature.

Employees can report any such issues or incidents via an internal reporting system.

Aware Super is committed to providing its employees with healthy and safe work environment free from discrimination, bullying, harassment, sexual harassment, victimisation and unlawful discrimination.

It aims to ensure that all employees are treated fairly, with respect and with dignity.

Grievance and Complaints Policy

Aware Super is committed to providing a safe and equitable working environment for all employees, where employees feel comfortable to raise complaints or grievances and are confident that they will be addressed promptly and appropriately.

This policy provides employees with the opportunity to have their concerns addressed in a reasonable and prompt manner and ensures they are not targeted or victimised for raising a sincere grievance or complaint.

Whistleblowing Policy

The Whistleblowing Policy provides guidance on how to raise concerns about suspected or actual unethical or unlawful behavior at work and outlines how Aware Super will deal with reports of serious wrongdoing.

It sets out the avenues available to staff to raise concerns regarding any serious wrongdoing (including unethical, illegal, corrupt or other inappropriate conduct) without being subject to victimisation, harassment or discriminatory treatment.

Work Health and Safety Policies

Aware Super is fully committed to achieving the highest standards of work health and safety and an integrated approach to employee wellbeing.

Our aim is to prevent work related injury and/or harm by creating and maintaining physically and psychologically safe and healthy working environment for all our employees, as well as our contractors, sub-contractors, clients and visitors who enter our premises or conduct work on our behalf.

Leave Policy

Employee wellbeing is an important part of the culture at Aware Super. Our leave policy provides generous leave entitlements which are more than the legislated leave entitlements.

This facilitates a good work-life balance for our employees ensuring that when they do come back to work again, they are refreshed and motivated.

Equity, Diversity and Inclusion Strategy

It aims to deliver a dynamic workplace where our culture, values and opportunities attract and retain talented people to achieve our purpose, wherein:

Equity means providing fair and unbiased access to opportunities, learning and resources for all our employees,

Diversity means to understand, accept and value the differences between us and create an open and cohesive workplace.

Inclusion is underpinned by belonging, openness and psychological safety in the workplace and recognises diversity and shows understanding, acceptance and respect of everyone's differences.

Reporting

If employees have any concerns, they can use the complaints, grievance and whistleblowing services to Speak Up! We also conduct regular employee engagement surveys with our people to understand their concerns and create robust action plans from these survey results.

Employees raising concerns via internal channels or the whistleblowing service are protected as per the relevant legislations and the Code of Conduct.

In the context of modern slavery, we believe that this can be an important asset in assisting employees to raise concerns if they perceive there is a risk of modern slavery practices.

Remediation

We recognise that freedom from slavery is a fundamental human right and we are committed to eliminating the risk of modern slavery within our organisation. Aware Super shares responsibility with the community for eradicating slavery.

Aware Super's collection of policies and associated processes reiterate our approach to remediate any instance of modern slavery uncovered. This is in addition to our responsibilities to report relevant disclosures to policing authorities.

Aware Super is committed to assess the effectiveness of its HR policies framework to reinforce zero tolerance to modern slavery practices.

Employee Entitlements and Rights

Aware Super sets high standards for itself and provides all the legislated entitlements and rights to its employees. Following is a non-exhaustive list of employee entitlements and rights:

- All entitlements as per the NES.
- All entitlements as per the applicable industrial instruments.
- Freedom of association.
- Right to make a complaint without consequence.

Assessing the effectiveness of actions

At Aware Super, we recognise that it will take time and effort globally to address modern slavery. Change will be incremental, largely driven by an increased awareness of the issue. We are committed to taking action to ensure that we are managing our risks and influencing our supply chains to address the issue.

We regularly assess the effectiveness of our engagement activities (including those of our controlled entities, where relevant) and, in accordance with our engagement framework consider whether escalation is appropriate. Escalation may include using our voting rights at company AGMs relating to human rights or divestment. Our Exclusion Framework will be utilised should divestment be contemplated.

All employees receive Code of Conduct training upon appointment and we ask all continuing employees to review our Code of Conduct regularly. We monitor compliance with this training requirement. We also encourage staff to report any concerns through our employee hotline. Reports from the employee hotline are aggregated and reported to the board.

Our compliance and internal audit function undertakes regular reviews of our policies and will incorporate our compliance with the Modern Slavery Act into its program. Our internal audit team reports directly to the Audit, Risk and Compliance Committee.

Our current activity is focused on assessing modern slavery risk and our frameworks to address risk. From there, we intend to identify further relevant actions which we anticipate may include incorporating relevant indicators in KPIs, partnering with NGOs and ensuring all our supply contracts include appropriate modern slavery clauses.

Consultation with the Fund's controlled entities

In preparing this modern slavery statement, relevant directors and officers of Aware Super were consulted and provided with an opportunity to review the statement prior to its approval. We will also be providing our Modern Slavery statement to our controlled entities for their review.

Other information

Many businesses within our supply chain and operations are continuing to evolve programs to mitigate modern slavery risks. Likewise, Aware Super's own program will continue to evolve focussing on consistent improvement. We have identified the following areas for development over the next 12 months:

- Further engagement with our suppliers based on their responses to our questionnaire to both educate and support our suppliers in developing and refining their approach to exposure of identified modern slavery risks
- Incorporating further controls within our supplier operations processes to ensure that Aware Super and its suppliers enhance the effectiveness of our modern slavery risk

assurance program. This includes supply chain mapping of all suppliers that incorporates the country of all operations (not just the country of incorporation) and consideration of supply chains that extend beyond our direct suppliers.

- Continue advocacy work on modern slavery, working with regulators and policy makers, as well as supporting public awareness of the issue.
- Continue work with our investment fund managers in developing and refining their approach to exposure of identified modern slavery risks in our investment portfolio.
- Continue our engagement activities with companies particularly as part of our involvement with IAST-APAC.

Approval

This statement is made pursuant to section 13(1) of Modern Slavery Act (Commonwealth) 2018. It constitutes the statement of the Trustee as trustee for the Fund for the year ended 30 June 2021 and has been approved by the Board of the Trustee.



Neil Cochrane

Chairman

December 2021

Appendix A

Controlled entities of the Fund

Name	Country of incorporation
Altis Real Estate Trust	Australia
ALTRAC Light Rail Holdings 2 Pty Ltd	Australia
Aware Financial Services Australia Limited ¹	Australia
Aware Super ELG Finco Pty Ltd	Australia
Aware Super Legal Pty Limited ¹	Australia
Aware Super Services Pty Limited (formerly FSS Services Pty Limited) ¹	Australia
Aware Super Social Infrastructure Investment Company Pty Ltd (formerly Lend Lease Public Infrastructure Investment Company Pty Ltd)	Australia
Aware Super Private Equity SRI Trust	Australia
Blackbird Aware Super Co-investment trust (formerly Blackbird FSS Co-investment Trust)	Australia
Darby Servtec Energia LP	United States of America
Exemplar Health (SCUH) Holdings 3 Pty Ltd	Australia
Exemplar Health (SCUH) Holdings 4 Pty Ltd	Australia
First State Super Private Equity Trust	Australia
First State Super Financial Services Pty Ltd ¹	Australia
First State Super Product and Administration Services Pty Ltd ¹	Australia
First State Super Holdings Pty Limited ¹	Australia
FSS Agriculture 1 Pty Limited	Australia
FSS BAC Airports 1 Pty Ltd	Australia
FSS Darling Square Trust	Australia
FSS Energy Credit Trust	Australia
FSS Infrastructure Trust	Australia
FSS Liberty Trust	Australia
FSS Multi Family Residential Trust	Australia
FSS NSW Almond Orchards Trust	Australia
FSS Product Services Trust ^{1,2}	Australia
FSS Real Estate Trust	Australia
FSS Retirement Villages Trust	Australia
FSS SA Almond Orchards Trust	Australia
FSS Two Melbourne Quarter Trust	Australia
FSS Vic Almond Orchards Trust	Australia
FSSSP Financial Services Pty Limited ¹	Australia
Golden NA Co-Invest Blocker 1 LLC	United States of America
LGS Investment Trust	Australia
VicSuper Pty Limited ¹	Australia
VicSuper Future Farming Landscapes Trust	Australia
VicSuper Future Farming Landscapes Land Holdings Trust	Australia
VicSuper International Private Equity Trust	Australia
Western Australia Local Financial Services Pty Ltd ¹	Australia
Western Property Trust No.2.	Australia
WA Local Government Superannuation Plan Pty Ltd	Australia

¹ Service subsidiary

² Parent entity of Aware Financial Services Australia Limited



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