



MORRISON & CO

# Modern Slavery Statement 2023

## Foreword

**Morrison believes that respect for human rights is an integral part of society and business, and that the abolition of modern slavery in any form should be the shared goal of individual and corporate citizens alike.**

We are pleased to publish our second consecutive modern slavery statement outlining the activities undertaken **by H.R.L. Morrison & Co Group Limited Partnership ("Morrison LP")** and its Australian subsidiary entities (collectively, "**Morrison & Co**" or "**Morrison**") to identify, assess and mitigate modern slavery risk in our operations and supply chains. We remain committed to better understanding our modern slavery risks and actively engaging with our stakeholders, employees, affiliates and suppliers to ensure that we are implementing the appropriate steps to mitigate such risks.

As a signatory to the UN supported Principles for Responsible Investment ("**PRI**"), Morrison actively engages on environmental, social and governance issues ("**ESG**") with the companies in which it invests with the aim of enhancing their performance and minimising investment risks associated with ESG factors.

The Board of H.R.L Morrison & Co Group GP Limited, the general partner of H.R.L. Morrison & Co Group Limited Partnership ("**Board**") is committed to upholding the tenets underpinning the *Modern Slavery Act 2018* (Cth) (the "**Act**") and international conventions, such as the UN Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights and the International Labor Organisation ("**ILO**"). Our efforts are informed by the works of international bodies and non-governmental organisations including publications such as the International Labour Organisation's Global Estimates of Modern Slavery and the Walk Free Foundation's Global Slavery Index ("**GSI**").

This year marks an increase in our efforts to better understand modern slavery risks in our operations and supply chains and investments we manage, as well as an increase in our efforts to effectively engage with and manage those risks.

In this reporting period, Morrison engaged subject matter experts and third-party data providers to further engage with the issue of modern slavery across both our corporate and investment supply chains. Aided by the insights provided, we conducted desktop due diligence on Morrison's largest corporate suppliers in terms of dollars spent and began the process of implementing a number of changes to our governance policies and procedures to further our commitment to identify and mitigate modern slavery risk.

With our portfolio entities, the companies in which Morrison invests, we have further analysed their respective operations and supply chains to gain a more fulsome understanding of modern slavery risk in our investment portfolio.

We are committed to continuing our performance in this regard and intend to implement our Modern Slavery Action Plan in the coming reporting periods to improve our performance within the space.

We will continue to grow our organisational capacity to address modern slavery matters and further realise our goals to effectively mitigate modern slavery risk in the tiers of our supply chain.



**Rob Morrison**  
Chair



**Paul Newfield**  
Chief Executive Officer



## Actions completed in FY23

Area	Actions completed	Pages
<b>Entities &amp; Structure</b> Responsive to Mandatory Criteria 1 and 2	<ul style="list-style-type: none"> <li>Identified reporting entities.</li> <li>Described Morrison's operations, investments, and supply chains.</li> </ul>	1-2 3-15
<b>Policies &amp; Protocols</b> Responsive to Mandatory Criteria 3 and 4	<ul style="list-style-type: none"> <li>Morrison Responsible Investment Policy.</li> <li>Morrison Sustainability Framework.</li> <li>Human Rights &amp; Modern Slavery Position Statement.</li> <li>Developed a draft Supplier Code of Conduct (to be approved in FY24).</li> <li>ESG questionnaire for onboarding suppliers</li> <li>Whistleblower Policy.</li> </ul>	5 16-18
<b>Due Diligence</b> Responsive to Mandatory Criteria 3 and 4	<ul style="list-style-type: none"> <li>Engaged FairSupply to re-map and re-assess Morrison's corporate supply chain and investment portfolio.</li> <li>Conducted desktop due diligence of key industries relating to Morrison's suppliers.</li> <li>Conducted desktop due diligence on investment portfolio.</li> </ul>	6-15
<b>Mitigation &amp; Remediation</b> Responsive to Mandatory Criteria 3 and 4	<ul style="list-style-type: none"> <li>Whistleblower Policy.</li> <li>Recorded zero reports of actual or suspected instances of modern slavery during the reporting period (one instance of modern slavery was brought to our attention after March 2023 (refer case study on page 21)).</li> </ul>	16-18
<b>Training &amp; Education</b> Responsive to Mandatory Criteria 3 and 4	<ul style="list-style-type: none"> <li>Conducted training and education for Morrison employees.</li> <li>Engaged subject matter experts to provide tailored presentations to key stakeholders.</li> </ul>	18
<b>Assessing Effectiveness</b> Responsive to Mandatory Criteria 5	<ul style="list-style-type: none"> <li>Conducted year-on-year analysis using quantitative metrics from FairSupply data.</li> <li>Established Morrison's Modern Slavery Action Plan to measure progress and continuous improvement.</li> </ul>	19
<b>Consultation and Collaboration</b> Responsive to Mandatory Criteria 6 and 7	<ul style="list-style-type: none"> <li>Consulted with Morrison owned and controlled subsidiary entities.</li> <li>Engagement with our portfolio entities incorporates human rights and modern slavery.</li> <li>Ongoing Signatory to the UN supported Principles for Responsible Investment and membership of Responsible Investment Association of Australasia.</li> </ul>	1-2 20
<b>Geopolitical Events</b> Responsive to Mandatory Criteria 3, 4 and 7	<ul style="list-style-type: none"> <li>Maintained resilience of portfolio and supply chains in light of COVID-19, economic concerns and the other geopolitical issues.</li> </ul>	-

## Table of Contents

Introduction	1
<hr/>	
About Morrison	3
<hr/>	
Modern Slavery Risks in our Operations and Supply Chain	6
<hr/>	
Actions Taken to Assess and Address Modern Slavery Risk	16
<hr/>	
Assessing the Effectiveness of Morrison's Approach	19
<hr/>	
Process of Consultation with Entities Owned or Controlled	20
<hr/>	
Next Steps	20
<hr/>	

### About this Statement

This modern slavery statement is made by, and on behalf of the Australian subsidiaries of, H.R.L. Morrison & Co Group Limited Partnership for the financial year ended 31 March 2023. It has been prepared pursuant to the requirements of the Australian Modern Slavery Act 2018.

The statement was approved by the Board of H.R.L. Morrison & Co Group GP Limited as general partner of MCO LP on 30 September 2023.

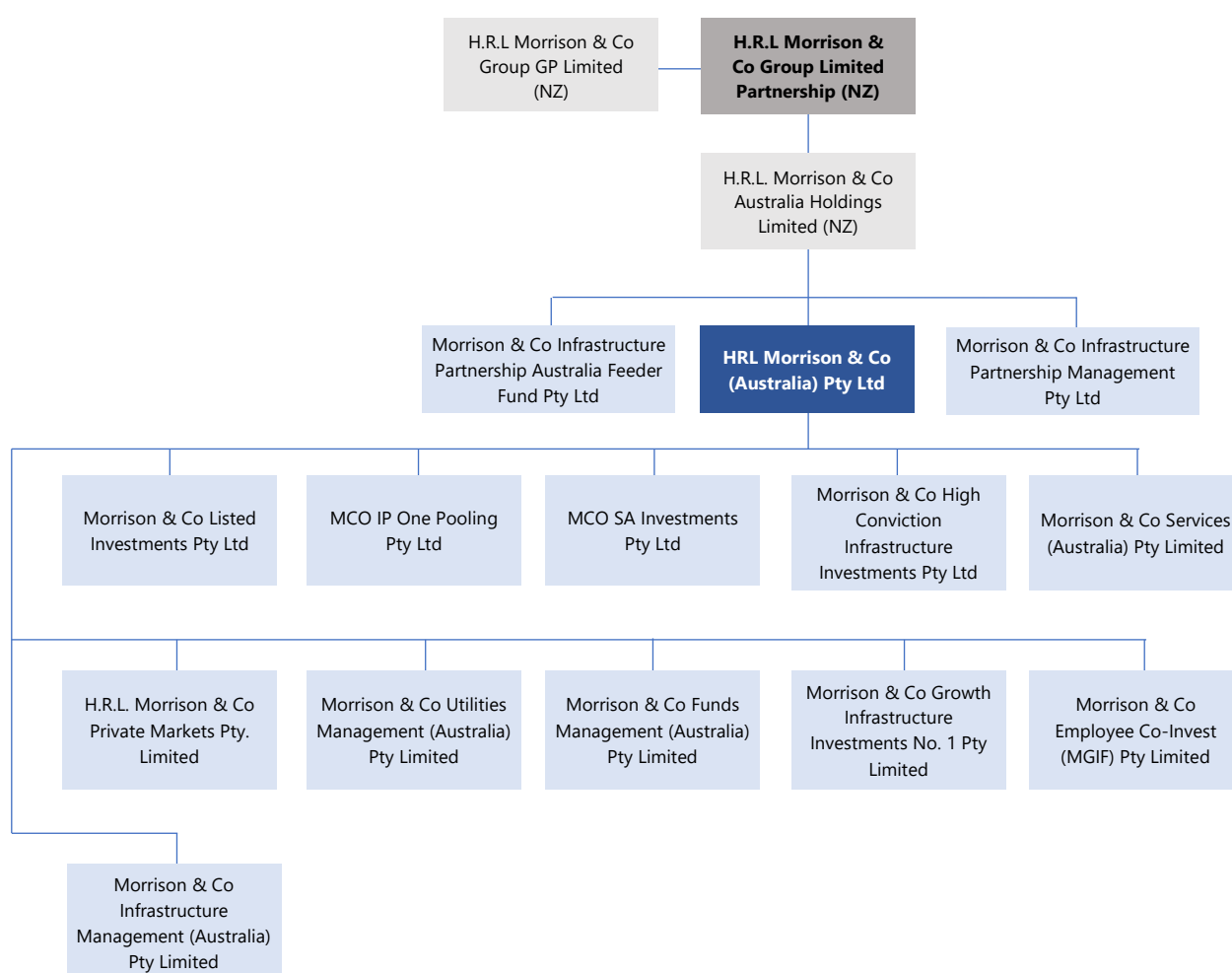
## Introduction

This Modern Slavery Statement ("Statement") has been prepared in accordance with the requirements of the Act in respect of the period of 1 April 2022 – 31 March 2023 (the "Reporting Period").

This Statement describes Morrison's business, operations and supply chains and outlines:

- Morrison's efforts to identify risks of modern slavery occurring in our operations and supply chains.
- The actions taken by Morrison to assess and address these risks.
- The assessment of the effectiveness of actions taken to address modern slavery risks.

The ultimate holding entity of the Morrison & Co Group ("**Group**") is H.R.L. Morrison & Co Group Limited Partnership ("**Morrison LP**") (identified in dark grey), which is a New Zealand limited partnership established under the *Limited Partnerships Act 2008 NZ*. This entity is the reporting entity under the Act.



**Figure 1:** Morrison corporate structure (Australia) as of 31<sup>st</sup> March 2023

The entities identified in light blue are special purpose entities established by Morrison for the purposes of undertaking the role of trustee, entering into investment management agreements and conducting its investment management activities. These entities do not have any direct employees however these entities may periodically engage suppliers. Morrison's Australian employees sit under HRL Morrison & Co (Australia) (identified in dark blue), and it regularly engages suppliers.

The Group includes the following wholly-owned principal operating subsidiaries:

- H.R.L. Morrison & Co Limited
- HRL Morrison & Co (Australia) Pty Ltd
- H.R.L. Morrison & Co (US), LLC
- Morrison & Co (Singapore) Pte. Ltd
- H.R.L. Morrison & Co (UK) Limited.

This Statement is submitted by Morrison & Co on behalf of the wholly owned Australian subsidiaries of the Group as outlined in the corporate structure above including:

- HRL Morrison & Co (Australia) Pty Limited (ACN 073 922 102)
- H.R.L. Morrison & Co Private Markets Pty. Limited (ACN 136 338 906)
- Morrison & Co Utilities Management (Australia) Pty Limited (ACN 624 308 809)
- Morrison & Co Infrastructure Management (Australia) Pty Limited (ACN 167 768 587)
- Morrison & Co Funds Management (Australia) Pty Limited (ACN 605 594 849)
- Morrison & Co Listed Investments Pty Ltd (ACN 640 170 501)
- Morrison & Co Infrastructure Partnership Management Pty Ltd (ACN 650 708 679)

## About Morrison

The Group was founded in 1988, and today manages multiple client mandates with total funds under management of approximately AUD 32 billion<sup>1</sup>.

### Structure & Operations

Morrison is a leading global infrastructure manager, investing in both private and listed markets from seven offices (Wellington, Auckland, Sydney, Melbourne, London, New York and Singapore) servicing its key markets of North America, UK & Europe and Asia, as well as its original markets of Australia and New Zealand. Morrison combines deep sector knowledge, asset management capability and operational expertise to deliver exceptional risk-adjusted returns for clients.

We manage investments for sovereign wealth funds, pension funds, family offices, endowments and other public and private pools of capital.

Our investment mandates are tailored to each client and cover equity and debt. Our investment services are offered in separately managed accounts and both open-end and closed-end co-mingled vehicles.

All of Morrison's offices are leased and as such there is a limited amount of control that Morrison may exert on the auxiliary services provided to manage such properties.

We note that Singapore has been identified as having a higher level of vulnerability to modern slavery and a lower level of government response when compared to the other countries in which our offices are located. To this end, Morrison notes that our operations in Singapore largely utilise suppliers that are skilled professionals with a low risk of exposure to sources of vulnerable labour.

As of 1 April 2023, there were 185 employees working for Morrison, with the majority based in Wellington, New Zealand and Sydney, Australia. Of the 185 employees, 163 are full-time employees, 12 are part time and 10 are casually employed.

The majority of Morrison's staff are tertiary educated professionals employed on a full-time basis. The nature of Morrison employees presents a low risk of modern slavery. Additionally, Morrison is subject to the robust labour laws in the jurisdictions of Australia, New Zealand, UK and the US.

As an investment manager, we are exposed to less risk in our corporate operations. However, on behalf of its clients, Morrison recommends and manages investments for its clients in other companies which may be exposed to modern slavery risk.

### Corporate Governance

The Morrison Board has overall responsibility for the governance of Morrison.

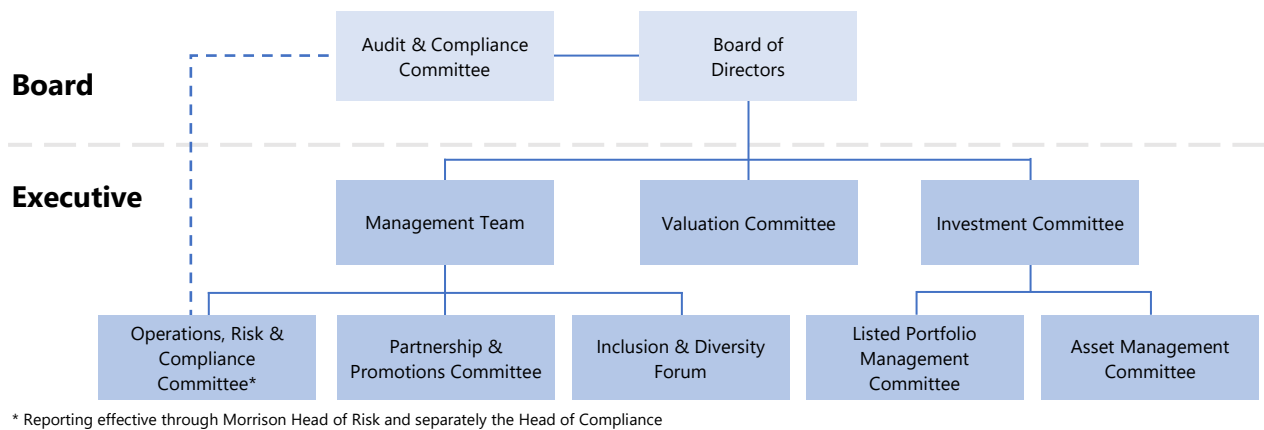
The primary role of the Board is to approve and monitor the strategic direction of Morrison, having appropriate regard to the interests of all material stakeholders.

Morrison's governance, risk, compliance and operational frameworks are overseen by its board of directors, and managed by investment, management and other committees comprised of senior management from across its business divisions, as shown in Figure 2 below.

Morrison's financial year is 1 April to 31 March.

---

<sup>1</sup> As of 31 March 2023



**Figure 2:** Morrison governance structure

### Investment Management Services

Morrison’s primary operations relate to the provision of investment management services to funds and other investment mandates in respect of a range of large and small infrastructure entities ("**Portfolio Entities**") covering diverse sectors and geographies. The Portfolio Entities carry on business in a number of different sectors and geographies and are managed by their own boards of directors and management teams. Morrison is not typically responsible for undertaking the day-to-day management of these entities.

Each Morrison managed fund or investment mandate typically hold equity positions in these Portfolio Entities and our level of influence varies depending on the proportion of managed equity in each business.

Morrison maintains an active role in these Portfolio Entities via our investment management responsibilities, board representation and, and in respect of discretionary funds managed by Morrison, the exercise of shareholder approval over certain actions. Despite the independent nature of some of these Portfolio Entities, Morrison acknowledges that there is an indirect exposure to modern slavery risk via the investment portfolio that it manages on behalf of the various managed funds, trust and investment mandates.

In order to effectively identify this risk and better understand Morrison’s ability to manage these risks, we endeavoured to analyse the respective operations and supply chains of these Portfolio Entities as outlined in the sections below.



## Investment Management Approach

Morrison’s purpose is to “invest wisely in ideas that matter” and, in doing so, we aim to create long-term value for our clients, the environment and society. We take an active management approach to convert our insights into superior returns for our investors. We bring deep sector expertise and real-world experience to look ahead and identify the global issues that matter and need solving. This means we focus on investments that align with the thematic of decarbonisation, digitalisation, an ageing population and essential infrastructure services.

We believe that ESG factors have an impact on investment performance and valuation, and as outlined in our Responsible Investment Policy, we seek to integrate ESG considerations into all stages of the investment cycle, aligning with the Morrison Sustainability Framework. The Sustainability Framework, which provides a ‘common language’ for responsible investment across Morrison, considers 12 aspects of ESG most material to the Morrison business, including human rights.

### MORRISON & CO SUSTAINABILITY FRAMEWORK



# Modern Slavery Risks in our Operations and Supply Chain

## Modern slavery risk mapping

Morrison is committed to understanding human rights and modern slavery risks in its operations and supply chain. To better understand and inform supply chain engagement, Morrison undertook a review of operational activities that occur within its corporate supply chain as well as each industry sector in which Morrison manages its clients' investments. This was done in conjunction with ESG data provider, FairSupply, and updates the mapping exercise established in our inaugural modern slavery statement.

FairSupply utilises proprietary technology to link global trade flow data through multi-regional input-output tables with supplier spend data to map the global supply chain up to the tenth tier. The platform allows an organisation to map its global supply chain risk up to ten tiers, across 190 countries and nearly 16,000 sectors. The analysis provides detailed supply chain data for the sectors in which Morrison's Portfolio Entities operate, as well as Morrison's corporate supply chain.

The aim of the review was to identify the activities within our operations, investments or supply chains that are believed to be most exposed to the potential occurrence of modern slavery.

## Morrison Corporate Supply Chain

Morrison had approximately 480 direct suppliers in its corporate supply chain during FY23. As a global organisation, Morrison procures a range of goods and services worldwide to support our operation. The majority of our suppliers are located in Australia and New Zealand. These jurisdictions have been identified by the GSI as having a relatively low prevalence of modern slavery and a strong level of government response, presenting an overall lower risk of modern slavery compared to the rest of the world.

Other jurisdictions from which Morrison procures goods and services are located in the UK and US. These two locations have similarly been identified by the GSI as having a strong level of government response, demonstrating a lower risk of modern slavery compared to the rest of the world.

Geography is one aspect of understanding modern slavery risk, with industry analysis being another useful lens. Morrison identified key areas of spend by industry assisted by the analysis undertaken by FairSupply, outlined below. We applied a materiality filter of over A\$50,000 in annual spend, resulting in a total of 140 qualifying suppliers for the period ending FY23 (making up 90% of overall spend). Utilising FairSupply's industry classifications, our FY23 supplier expenditure fell into the following categories outlined in Table 2 below.

**Table 2:** Results of Morrison’s modern slavery risk mapping of its corporate supply chain from FY23

Sector	Sector traits	Key risk areas
<b>Morrison Corporate Supply Chain</b>		
<p><b>Professional services – 80% to 90% of FY23 supplier spend</b></p> <ul style="list-style-type: none"> <li>Financial advisors</li> <li>Lawyers</li> <li>Industry experts</li> <li>Other professional services consultants</li> </ul>	<p>We engage specialists to provide professional services including financial, auditing, legal, accounting and taxation advice, insurance, strategy, marketing, communications and research services.</p>	<ul style="list-style-type: none"> <li>This industry generally has a relatively low level of modern slavery risk as it comprises a highly skilled professional workforce that is generally tertiary educated and commands strong levels of bargaining power in the workplace.</li> <li>Despite this, professional services, as indicated in this Statement, may incur modern slavery risk through their supply chain.</li> </ul>
<p><b>Business support services – 5% to 10% of FY23 supplier spend</b></p> <ul style="list-style-type: none"> <li>Business travel incl airlines and accommodation</li> <li>Hospitality/events management</li> <li>Catering and kitchen supplies</li> </ul>	<p>Morrison utilises travel, hospitality and accommodation providers as part of its ongoing operations. These industries carry an elevated risk of modern slavery from the various inputs required to facilitate air travel, hotel accommodation and hospitality/catering services.</p>	<ul style="list-style-type: none"> <li>The travel industry has a significant amount of unskilled labour in the form of hospitality workers and cleaning staff and has a noted reliance on migrant labour for its workforce.</li> <li>Catering and kitchen supplies such as tea and coffee can also come with an elevated risk of modern slavery</li> </ul>
<p><b>Real estate services – 5% to 10% of FY23 supplier spend</b></p> <ul style="list-style-type: none"> <li>Commercial office landlords</li> <li>Commercial office fitout including furniture</li> <li>Facilities management</li> <li>Waste removal</li> <li>Security services</li> </ul>	<p>Morrison procures real estate services relating to our corporate offices including commercial office accommodation and facilities management contractors.</p> <p>This industry is characterised by a higher instance of lower skilled, migrant workers which places it in a higher risk category for modern slavery.</p>	<ul style="list-style-type: none"> <li>Key industries with an elevated risk of modern slavery include cleaning, security and waste management.</li> </ul>
<p><b>Computer and IT services – 0% to 5% of FY23 supplier spend</b></p> <ul style="list-style-type: none"> <li>Computers and associated hardware</li> <li>Mobile phones</li> <li>Software</li> <li>Cloud technology</li> </ul>	<p>Morrison engages with information technology equipment, software, cloud providers and mobile telecommunication suppliers in order to facilitate our services.</p> <p>This industry has a comparatively higher level of modern slavery risk due to the nature of the equipment, its manufacturing and the sourced input materials.</p> <p>With the majority of IT technology sourced from Asia and specifically manufactured in South-East Asia, identified by the ILO’s Global Estimates of Modern Slavery as having the highest number of estimated slaves in the world, the industry has been subject to significant scrutiny.</p>	<ul style="list-style-type: none"> <li>IT equipment such as computers and associated hardware and software, and mobile phones. Partnering with reputable brand names should reduce the risk of modern slavery in the supply chain.</li> </ul>

## **Morrison Corporate Supply Chain Analysis**

Utilising the FairSupply platform, Morrison analysed FY23 supplier spend (annual individual supplier spend > A\$50,000) for the reporting period to assess the theoretical modern slavery footprint of Morrison's corporate supply chain.

The analysis confirmed that Morrison's direct suppliers are generally low risk for modern slavery. This is largely due to the location of its offices in Australia, New Zealand, the United Kingdom and the United States, jurisdictions with high standards of governance, as well as the categories of suppliers that Morrison employs (predominantly professional services firms where employees are from highly educated and skilled backgrounds). A number of suppliers in the hospitality and tourism sectors were classified as moderate-low risk as outlined below. In addition, four suppliers from Singapore were also given this classification, reflecting the relative higher level of risk found in Asian supply chains.

Adjusted on a per million dollars spent with each supplier, the highest risk lies with our travel spend, particularly with accommodation, travel agents and hospitality. Additional due diligence was conducted on our key travel provider, Corporate Travel Management ("**CTM**"), including a review of its Modern Slavery statements submitted under the Australian and UK Modern Slavery Acts. Under both statements submitted, CTM outlines its proactive approach to modern slavery risk within its operations and supply chains, implementing training programmes, engaging their suppliers and implementing a suite of policies and procedures related to modern slavery risk. Given the breadth of engagement on modern slavery, Morrison is comfortable with the organisational capacity of CTM to identify, assess and mitigate modern slavery risk within its operations and supply chains.

To better understand the most concentrated amount of modern slavery risk, Morrison undertook desktop due diligence on the top 20 suppliers of our supply chain.

### **Top 20 Analysis**

Morrison's top 20 suppliers constitute nearly 60% of our total spend for the last reporting period. This group of suppliers largely provide professional services including advisory work, consultancy, and legal work as well as commercial real estate and corporate travel services. These suppliers operate in industries where we have conducted due diligence, as detailed above, indicating that there was a comparatively lower risk within their direct operations. However, understanding that risk may be incurred in the lower tiers of our supply chain, Morrison endeavoured to better understand the actions taken by our key suppliers in relation to their respective modern slavery risks.

Of the top 20 suppliers, 75% (by spend) have modern slavery statements published in either Australia or the UK indicating that they have modern slavery reporting obligations in the jurisdictions in which they operate. Within these statements, each reporting entity has outlined a demonstrated level of engagement with the issue of modern slavery and taken proactive steps to effectively manage and mitigate such risks. 70% of the top 20 suppliers had an explicit Code of Conduct governing their operations and the conduct of their employees, which in most instances, required ethical conduct. Approximately 55% of the top 20 suppliers had published their Supplier Code of Conduct, requiring their respective suppliers to abide by and uphold their commitments.

These elements indicate the top 20 suppliers have an above average level of engagement with the issue of modern slavery and are taking proactive steps to actively manage and mitigate such risk in their operations and supply chains. These elements also support the finding that the theoretical risk assigned to these suppliers is more the result of our proportionally larger spend with these suppliers and less attributable to deficiencies in their responses to modern slavery risk.

## Morrison Investment Portfolio Supply Chain Analysis

Morrison's investment portfolio that it manages on behalf of its funds and investments mandates is comprised of infrastructure investments across a broad range of sectors, and various jurisdictions around the world. In order to better understand the total modern slavery risk exposure of our investment portfolio, we undertook an analysis of the portfolio using FairSupply. In the interest of understanding risks of modern slavery more broadly, we undertook this exercise across all Morrison funds and investment mandates as outlined below.

### **Unlisted investments**

The results of the risk mapping process are described in Table 3 below and cover Morrison's total managed investment portfolio. Two of Morrison's managed Funds, Infratil Limited and Utilities Trust of Australia, qualify as reporting entities under the Act and publish a modern slavery statement each year.

Using the weighted metric of "theoretical slaves per \$million spent", Morrison identified the highest identified risk of modern slavery coming from Gurin, a renewable energy company headquartered in Singapore. Despite being identified as the highest risk for modern slavery in our investment portfolio, FairSupply categorised the company as presenting a "moderate" risk. The renewable energy industry and the inputs required therein have been characterised as being potentially at-risk of modern slavery. The photovoltaic cells used in solar panels and the balsa wood used in wind turbine blades are sourced primarily from geographic regions which are exposed to the risk of labour exploitation. Morrison is prioritising human rights engagement with Gurin, due to its elevated risk. This includes ensuring that Gurin prioritises the development of ESG policies, codes of conduct, and appropriate risk assessments for high-risk suppliers and renewable energy partners.

Outside of Infratil Limited and Utilities Trust of Australia, Morrison manages a number of funds and investment mandates that are not currently subject to Modern Slavery reporting obligations. The Morrison Infrastructure Partnership ("**MIP**") investment portfolio is a Luxembourg-domiciled core infrastructure fund that is invested in five Portfolio Entities in the telecommunications and renewable energy sectors. While the geographies that these companies are located in (US, Canada, Australia and Spain) have a lower-than-average prevalence and vulnerability to modern slavery, they do have extensive construction projects which can increase the risk of modern slavery from the use of subcontractors, migrant labour, and from the sourcing of key materials required to construct such infrastructure. It should be noted however, that the Australian, Canadian and US governments have implemented measures to mitigate the risk of modern slavery such as the Australian Modern Slavery Act (2018), Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (2022), and the *US Uyghur Forced Labour Prevention Act* (2021) which should strengthen the protection of human rights via increased supply chain transparency.

The Morrison Growth Infrastructure Fund ("**MGIF**") is domiciled in Australia and focuses on a number of infrastructure assets located in Australia, Switzerland and the Netherlands. Within this Fund, the predominant risk comes from a provider of health services located in Australia. Whilst Australia has robust labour laws and a governmental response to modern slavery, the health services industry has been characterised by the occurrence of modern slavery risk through the use of migrant labour in support staff (orderlies, cleaners, etc.) and in the procurement of key goods for their operations such as personal protective equipment, which has been the subject of publicised instances of modern slavery. However, this Portfolio Entity is a reporting entity under the Act and has undertaken a review of its operations and supply chains to better understand risk factors. It has implemented a number of actions including refined procurement processes and centralised recruitment and on-boarding processes to minimise the risk of labour exploitation. In addition, its key suppliers are large entities with their own modern slavery reporting obligations and robust processes and oversight to manage modern slavery risk.

MGIF also invests in Pastoral Partners Australia, an Australian company, that directly invests in and partners with Australian farming families in pastoral land across Australia. The agricultural industry has been



recognised as having an elevated risk of modern slavery practices due to the prevalence of temporary and seasonal workers, however, Pastoral Partners Australia specifically targets partnerships with local farming families and supports local employment as part of this partnership which minimises the occurrence of modern slavery risk with at-risk employees.

The Public Infrastructure Partners ("**PIP**") funds managed by Morrison comprise Portfolio Entities that conduct public-private partnerships to design, construct and maintain public infrastructure in New Zealand. Whilst the industries in which these Portfolio Entities operate may incur higher-than-average modern slavery risk, the rate of modern slavery risk in New Zealand is comparatively low compared to other at-risk regions. Additionally, these Portfolio Entities are managed and operated in conjunction with the New Zealand Government, and this additional oversight further mitigates modern slavery risk.

### **Listed investments**

Morrison's listed investments fund, Morrison Listed Infrastructure ("**MLI**"), incorporates human rights and modern slavery considerations as part of its Responsible Investment Strategy and through its pre-investment process and ongoing asset management activities.

Before any investment decision is made, an investment prioritisation and risk identification exercise is conducted using a proprietary Sustainability Risk Rating. This rating incorporates criteria relating to:

- The level of controversy of investment opportunities (third-party data).
- The extent to which any investment opportunity has policies in place against key governance issues including human rights and modern slavery.
- Violations against UN Global Compact ("**UNGC**") principles and OECD Guidelines for Multinational Enterprises which includes human right and modern slavery considerations.

Detailed due diligence complements the pre-investment process for any investment opportunity. During this step, a comprehensive materiality-based ESG due diligence checklist is completed, using the twelve ESG elements in the Morrison Sustainability Framework, which formally incorporates human rights. Following this, initiatives to mitigate ESG risks are identified and, where appropriate from a risk/return perspective, quantified for inclusion in the investment case. ESG due diligence findings are utilised to produce an ESG profile for each company and the outcomes of this process inform our engagement. As part of its Proxy Voting Guidelines, which support Morrison's goal to optimise the social impacts of its activities, MLI also supports vote proposals requesting that companies:

- Are signatories to the UN Global Compact and establish labour management practices that are consistent with globally accepted human rights standards.
- Develop sustainable supply chain policies and procedures that ensure that suppliers and contractors respect human rights and comply with relevant laws and/or international standards regarding wages, benefits, and working conditions.
- Regularly assess the potential for labour and human rights breaches and modern slavery occurrences to exist within their supply chain.
- Undertake due diligence investigations in a manner that is appropriate to their sector.

**Table 3:** Results of FY23 Morrison modern slavery risk mapping of its investment portfolio

Sector	Sector traits	Key risk areas	Mitigating factors
<b>Morrison Investment Portfolio Supply Chain</b>			
<b>Airports</b> Perth Airport, Australia Australia Pacific Airports Corporation ("APAC"), Australia Queensland Airports Limited ("QAL"), Australia Wellington International Airport ("WIAL"), New Zealand	<ul style="list-style-type: none"> <li>Airports typically employ a relatively limited direct workforce but engage a multitude of contractors and subcontractors to undertake facility services.</li> <li>Further, there are many tenants on site that may employ their own contractors (aeronautical, retail and commercial).</li> <li>Construction activities occur frequently onsite and are often major developments.</li> <li>Directly engaged contractors are considered a key focus to alleviate any modern slavery risks from company-controlled operations, followed by tenants and their contractors associated with the airport.</li> </ul>	<ul style="list-style-type: none"> <li>Cleaning and maintenance</li> <li>Construction activities</li> <li>Human trafficking and detainment</li> </ul>	<ul style="list-style-type: none"> <li>Perth Airport, APAC and QAL are reporting entities under the Australian Modern Slavery Act</li> <li>WIAL has policies and processes in place to manage its Modern Slavery risk and has utilised the FairSupply platform to provide insights on risk in its supply chain. More information can be found in its annual <a href="#">Kaitiakitanga report</a></li> </ul>
<b>Water Utilities</b> Sydney Desalination Plant, Australia South East Water, United Kingdom	<ul style="list-style-type: none"> <li>Organisations associated with the provision of water for public use are primarily office based with some infield operations required for maintenance, testing and engineering purposes.</li> <li>Contractors are often engaged for construction and design of major works and specialist engineering services are required across the network.</li> <li>Equipment may be sourced from countries with an increased risk of modern slavery occurrences.</li> </ul>	<ul style="list-style-type: none"> <li>Construction activities</li> <li>Equipment manufactured offshore</li> <li>Support services procured offshore e.g., IT helpdesk, HR &amp; payroll</li> </ul>	<ul style="list-style-type: none"> <li>Sydney Desalination Plant is a reporting entity under the Australian Modern Slavery Act</li> <li>South East Water is a reporting entity under the UK Modern Slavery Act</li> </ul>
<b>Energy Transmission &amp; Distribution</b> Transgrid, Australia ElectraNet, Australia Phoenix Natural Gas, United Kingdom	<ul style="list-style-type: none"> <li>Organisations associated with electricity or natural gas distribution, or transmission are primarily office based, however also have infield operations required for maintenance and engineering purposes.</li> <li>Contractors are often engaged for construction or major works and specialist engineering services are required across the network.</li> <li>Equipment may be sourced from countries with an increased risk of modern slavery occurrences.</li> </ul>	<ul style="list-style-type: none"> <li>Construction activities</li> <li>Equipment manufactured offshore</li> <li>Support services procured offshore e.g., IT helpdesk, HR &amp; payroll</li> </ul>	<ul style="list-style-type: none"> <li>Transgrid and ElectraNet are reporting entities under the Australian Modern Slavery Act</li> <li>Phoenix Natural Gas is a reporting entity under the UK Modern Slavery Act</li> </ul>

Sector	Sector traits	Key risk areas	Mitigating factors
<b>Renewable Energy Development and Operations</b>  Mint Renewables, Australia  Manawa Energy (formerly Trustpower), New Zealand  Longroad Energy, United States  Galileo, Europe  Gurin, Energy, Asia  Chrysalis, UK and North America	<ul style="list-style-type: none"> <li>Organisations associated with the development and operation of utility-scale renewable energy projects and infrastructure are primarily office based with some infield operations required for maintenance and engineering purposes.</li> <li>Contractors are often engaged for any construction or major works and specialist engineering required across the network.</li> <li>Equipment, or key inputs to equipment, may be sourced from countries with an increased risk of modern slavery occurrences.</li> <li>Key materials such as balsa wood (for wind turbines), solar-grade polysilicon (for solar panels) and cobalt (for batteries) have been linked to regions where there have been reported instances of modern slavery.</li> </ul>	<ul style="list-style-type: none"> <li>Construction activities</li> <li>Contracted labour force (operations &amp; maintenance)</li> <li>Equipment, and key inputs to equipment, manufactured offshore</li> </ul>	<ul style="list-style-type: none"> <li>The renewable energy sector is highly aware of the elevated risks of modern slavery in its supply chain</li> <li>Management of human rights risks is incorporated into Morrison's ESG engagement with Portfolio Entities, and we work towards each company having as a minimum: a Supplier Code of Conduct, a Modern Slavery Policy, appropriate grievance mechanisms and employee education. We also encourage supplier due diligence and risk assessments using a platform such as FairSupply.</li> <li>Morrison is prioritising human rights engagement with our renewable energy companies due to these risks</li> </ul>
<b>Data Infrastructure</b>  Australian Registry Investments ("ARI"), Australia	<ul style="list-style-type: none"> <li>Organisations operating within the data infrastructure sector are wholly office-based, with little to no contractors.</li> <li>Electronics, telecommunication equipment and furnishings used at the office site by staff may be sourced from countries with an increased risk of modern slavery occurrences.</li> <li>Key inputs include IT, the procurement of which attracts modern slavery risk through the sourcing of manufactured circuit boards for use in IT equipment, and further down in the supply chain from the sourcing of raw materials such as gold, tin and other metals that have been termed "conflict minerals".</li> </ul>	<ul style="list-style-type: none"> <li>Support services procured offshore e.g., data warehousing, customer call centres</li> <li>Telecommunications and IT equipment manufactured offshore</li> <li>Contracted facility services (i.e., cleaning and security)</li> </ul>	<ul style="list-style-type: none"> <li>ARI is a reporting entity under the Australian Modern Slavery Act</li> </ul>

Sector	Sector traits	Key risk areas	Mitigating factors
<b>Digital Infrastructure</b> CDC, Australia & New Zealand Uniti, Australia Amplitel, Australia FortySouth, New Zealand One NZ (formerly Vodafone NZ), New Zealand Kao Data, United Kingdom Fore Freedom, The Netherlands Fiberlight, United States Lyntia Networks, Spain Kacific Broadband Satellites, Singapore	<ul style="list-style-type: none"> <li>Organisations operating within the data and connectivity sector are largely office-based.</li> <li>Contractors are regularly engaged to deliver infrastructure-related construction projects and technology upgrades.</li> <li>Electronics and telecommunication-related systems may be sourced from countries with an increased risk of modern slavery occurrences.</li> <li>Key inputs include information technology, the procurement of which attracts modern slavery risk through the sourcing of manufactured circuit boards for use in IT equipment, and further down the supply chain from the sourcing of raw materials such as gold, tin and other metals that have been termed “conflict minerals”.</li> </ul>	<ul style="list-style-type: none"> <li>Support services procured offshore e.g., data warehousing, customer call centres.</li> <li>Telecommunications and IT equipment manufactured offshore.</li> <li>Construction activities</li> <li>Contracted facility services (i.e., cleaning and security)</li> </ul>	<ul style="list-style-type: none"> <li>CDC, Uniti and Amplitel’s controlling entity are reporting entities under the Australian Modern Slavery Act</li> <li>Kao Data is a reporting entity under the UK Modern Slavery Act</li> <li>Management of human rights risks is incorporated into Morrison’s ESG engagement with Portfolio Entities, and we work towards each company having as a minimum: a Supplier Code of Conduct, a Modern Slavery Policy, appropriate grievance mechanisms and employee education. We also encourage supplier due diligence and risk assessments using a platform such as FairSupply.</li> </ul>
<b>Retirement Living</b> RetireAustralia, Australia	<ul style="list-style-type: none"> <li>Retirement living businesses typically employ head office staff and a small management team at each facility.</li> <li>Contract services are often utilised to fulfil facility related services such as cleaning, catering, facilities management and maintenance, gardening and care assistance roles.</li> <li>The construction of new retirement villages presents elevated risk</li> <li>The contracted labour used to maintain facilities is a greater risk due to the extensive use of unskilled and migrant labourers, who are at greater risk of being exploited.</li> <li>Personal Protective Equipment (PPE) manufacturers have been exposed to significant risk during the COVID-19 pandemic with reported instances of modern slavery.</li> <li>Residents may also directly engage healthcare professionals and other service providers.</li> <li>Due to the often geographically disparate nature of retirement living communities different service models may exist between facilities.</li> </ul>	<ul style="list-style-type: none"> <li>Contracted facility services (i.e., catering, cleaning and grounds-keeping, waste management, care staffing).</li> <li>Personal Protective Equipment (PPE)</li> <li>Construction activities.</li> </ul>	<ul style="list-style-type: none"> <li>RetireAustralia is a reporting entity under the Australian Modern Slavery Act. Morrison has assisted with a supplier risk assessment using FairSupply to help Retire Australia better understand and identify its modern slavery risks.</li> </ul>

Sector	Sector traits	Key risk areas	Mitigating factors
<b>Diagnostic Imaging</b> Qscan, Australia RHC Group (Pacific Radiology, Bay Radiology, Auckland Radiology), New Zealand	<ul style="list-style-type: none"> <li>Diagnostic imaging clinics are typically office-like facilities with multiple enclosed rooms utilised for medical imaging services and to undertake medical procedures and consultations.</li> <li>Administrative and support staff work alongside doctors and diagnostic imaging specialists at each facility.</li> <li>Maintenance and specialist engineering services are required on an ad hoc basis which are often outsourced. Cleaning services for the facilities are also outsourced.</li> <li>Medical imaging devices rely on raw materials such as various metals, lead, cobalt and lithium which have been linked to child labour and jurisdictions such as China</li> <li>IT infrastructure maintenance, and other technical work in offshore companies, which may be located in regions where workers are vulnerable to exploitation and abuse.</li> <li>Single use medical consumables such as plastic gloves, gowns and masks may have an elevated risk of modern slavery in their manufacture.</li> </ul>	<ul style="list-style-type: none"> <li>Cleaning &amp; maintenance.</li> <li>Medical consumables such as PPE</li> <li>Medical imaging equipment</li> <li>Support services procured offshore e.g., IT helpdesk, HR &amp; payroll.</li> </ul>	<ul style="list-style-type: none"> <li>Qscan is a reporting entity under the Act. A desktop due diligence exercise revealed a significant proportion of Qscan's supplier spend is with global and well-known medical manufacturing companies such as Canon, GE, Siemens and Philips which are reporting entities under the Australian and/or UK Modern Slavery Acts. In addition, Qscan's spend on real estate services is also with Australian landlords, some of which are reporting entities under the Act.</li> <li>If brought into force, RHC Group will likely be captured under the proposed New Zealand legislation and is developing an ESG strategy and suite of ESG policies and initiatives including on human rights and modern slavery. In addition, RHC is likely to have a similar supply chain to Qscan in that it has a high proportion of spend on medical diagnostic technology made by reputable, global manufacturing brands with modern slavery risk management in place.</li> </ul>



Sector	Sector traits	Key risk areas	Mitigating factors
<p><b>Public-Private Partnerships</b></p> <p>Melbourne Convention Centre, Australia</p> <p>Waikeria Prison, New Zealand</p> <p>Pūhoi to Warkworth, New Zealand</p> <p><i>The following assets were divested in December 2022:</i></p> <p><i>NZ Schools I Public Private Partnership</i></p> <p><i>NZ Schools II Public Private Partnership</i></p> <p><i>NZ Schools III Public Private Partnership,</i></p> <p><i>Auckland Prison, New Zealand</i></p> <p><i>Student accommodation at Auckland University of Technology, New Zealand</i></p>	<ul style="list-style-type: none"> <li>Public infrastructure projects attract risk in the form of the various inputs required for construction.</li> <li>Contracted and subcontracted labour reduces oversight into the working conditions of labour and increases the potential for worker exploitation.</li> <li>Sourcing of raw materials such as cement and iron, among others, incurs significant modern slavery risk as these are more likely to be sourced from regions with higher risk of poor labour conditions.</li> </ul>	<ul style="list-style-type: none"> <li>Construction activities</li> <li>Contracted labour force (operations and maintenance)</li> <li>Equipment, and key inputs to equipment, manufactured offshore</li> </ul>	<ul style="list-style-type: none"> <li>The Melbourne Convention Centre's operation (Plenary Group) and construction (Multiplex) entities are both captured under the Australian Modern Slavery Act</li> <li>The nature of these public-private partnerships invites significant due diligence and scrutiny due to the relationship with government enterprises.</li> </ul>
<p><b>Agriculture</b></p> <p>Pastoral Partners Australia</p> <p><i>The following asset was divested in December 2022:</i></p> <p><i>Sundrop Farms, Australia</i></p>	<ul style="list-style-type: none"> <li>Agriculture is a labour-intensive industry utilising high levels of untrained, manual labour which in turn is at greater risk of being exploited.</li> <li>The agriculture industry is characterised as having a higher proportion of migrant and seasonal workers increasing risk due to greater vulnerability to exploitative practices.</li> </ul>	<ul style="list-style-type: none"> <li>High proportion of unskilled labour</li> <li>Strong reliance on migrant and seasonal workers</li> <li>Difficulty in exercising oversight</li> </ul>	<ul style="list-style-type: none"> <li>Pastoral Partners Australia specifically targets partnerships with local farming families and promotes local employment as part of this partnership which minimises the occurrence of modern slavery risk with at-risk employees.</li> </ul>

## **Actions Taken to Assess and Address Modern Slavery Risks**

**The Board has defined its expectations for minimising modern slavery risk across Morrison to raise awareness across the corporate structure and empower staff to make a positive impact and reduce risk.**

Morrison predominantly operates in highly regulated environments within Australia, New Zealand, the United Kingdom and the United States. Because of this, our risk for modern slavery in our direct supply chain is relatively low. We do, however, acknowledge the possibility exists for indirect exposure to modern slavery risk within tiers of our supply chains.

Approved in 2020 and further reviewed in this reporting period, Morrison's Human Rights & Modern Slavery Position Statement describes the commitments that Morrison has made in relation to human rights and modern slavery. These include:

- Undertake an annual modern slavery risk review of our corporate supply chain.
- Engage with our higher-risk suppliers to determine the extent to which human rights and modern slavery risks are being incorporated and monitored in their operations and supply chains.
- Seek to ensure that our corporate policies and procedures are considerate of human rights and modern slavery to minimise the risk of Morrison becoming complicit in human rights violations and modern slavery. We have confidential grievance reporting mechanisms in place.
- Provide human rights and modern slavery-related learning and development opportunities to our employees.
- As part of our investment management process:
  - Integrate human rights and modern slavery risks into our investment recommendations and asset management processes.
  - Actively engage with Portfolio Entities, industry bodies and other key stakeholders on human rights and modern slavery-related matters and, where appropriate, we apply our influence to ensure that modern slavery risks are being appropriately managed and mitigated.
  - Seek to monitor human rights and modern slavery risks and support our clients in their reporting under the Act and the UK-equivalent of the Act, and any other applicable legislation, where required.

In this reporting period Morrison has amended the Statement to increase the breadth of acknowledgments and recognition of international conventions. The amendments to the Statement have included the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and the eight fundamental conventions of the ILO's Declaration on Fundamental Rights and Principles at Work.

Morrison's sustainability specialists and investment professionals are responsible for understanding and, where feasible, seeking the mitigation of ESG risks associated with the business activities of Morrison.

To support the commitment to minimising modern slavery risk, relevant Morrison employees were invited to participate in modern slavery training to increase their understanding of the risk, and to raise their awareness of where modern slavery risks can arise in the operations and supply chains of Portfolio Entities. In addition, Morrison's new employee induction process incorporates online human rights and modern slavery training.

In addition, Morrison's internal sustainability team has specific experience in developing and implementing modern slavery and supply chain due diligence programs, experience which has been shared with Portfolio Entities.

## **Case Study: Longroad Energy and First Solar**

Longroad Energy, a Portfolio Entity of Infratil and NZ Super Fund (a mandate managed by Morrison), became aware of a reported instance of modern slavery at the Malaysian operations of its US based supplier of solar panels, First Solar.

The instance was identified as a result of a Validated Assessment Program audit commissioned by First Solar as part of its membership of the Responsible Business Alliance.

The instance involved four onsite service providers involved in providing security, cleaning, building maintenance and warehousing services employing foreign migrant workers who were subjected to unethical recruitment including the payment of recruitment fees in their home countries, passport retention and the unlawful retention of wages.

First Solar publicly disclosed the incident, including with shareholders, and has since reported the return of the wages and passports to the identified workers and noted that they are pursuing further corrective measures including a reimbursement plan with a third party, which will reimburse any recruitment fees to current and former employees. They have also reported that they have updated their service agreements to prevent a recurrence of this issue. Longroad has also confirmed that they typically source most of their solar panels from First Solar's factory in North America.

This event is a key example of how modern slavery may occur deeper within the supply chain and the need to engage with, and diligence suppliers. It also highlights the importance of remediating any identified instances of modern slavery and the circumstances which gave rise to them.

## **Policies and Procedures**

### ***External Service Provider & Outsourcing Policy (including supplier ESG due diligence)***

This policy provides guidance to Morrison's employees on whether an activity can be safely outsourced or contracted to an external service provider and how to effectively monitor a service provider's ongoing performance. The key objective of the Policy is to safeguard Morrison against reputational risks and to meet our regulatory obligations, ethical standards and ESG standards including in relation to human rights and modern slavery.

A risk-based approach is recommended to ensure that Morrison utilises an appropriate level of scrutiny (dependent on corruption risk level) of third parties to satisfy the business and/or regulators that Morrison is dealing with a bona fide third party.

As part of our onboarding and engagement with key external service providers, we use a due diligence questionnaire to understand our suppliers and their level of sophistication and engagement with ESG issues. Third parties with a certain risk level are required to answer a series of questions around ESG policies and programmes (including human rights and modern slavery) and whether the provider is captured under the Act or other supply chain due diligence legislation. In doing so, Morrison is able to better understand potential ESG risk exposures, including modern slavery risk. This reporting period, Morrison engaged subject matter experts in the human rights and modern slavery space to review and amend our ESG questions to effectively identify pertinent issues in a manner that does not unduly burden our suppliers or delays their timely delivery of responses.

### ***Supplier Code of Conduct***

This reporting period, Morrison developed a draft Supplier Code of Conduct that is designed to ensure that our suppliers are aware of our commitment to our ESG goals, including the upholding of labour rights and the minimisation of modern slavery risk. The draft Supplier Code of Conduct sets out the requirements of our suppliers and encourages them to take proactive steps to improve their performance.

The Supplier Code of Conduct is slated to be implemented in our next reporting period.

### ***Modern Slavery Action Plan***

In an effort to increase our level of engagement with the risk of modern slavery in our operations and supply chains and to set out our evolving strategy to mitigate and minimise such risk, Morrison, assisted by modern slavery experts, formulated a multi-year action plan to provide a roadmap for continual improvement of our modern slavery strategy.

The Action Plan sets out actions and an internally determined priority to mitigate modern slavery risk. The Action Plan covers our approach to risk analysis, the policies and procedures to help mitigate risk, our training programme, our approach to grievances and remediation actions and our framework to evaluate our progress.

### ***Whistleblowing Policy***

Morrison's Whistleblowing Policy provides the mechanism by which our directors, officers, employees, suppliers of goods or services, contractors and other Morrison associates may make a protected disclosure relating to any behaviour that would be improper, illegal or unethical.

The Whistleblowing Policy allows those who make a disclosure to remain anonymous (where permitted by law) and provides protections for whistleblowers in accordance with local laws.

### ***Training and Education***

In May 2023, Morrison with assistance from FairSupply and a law firm that specialises in human rights and modern slavery, conducted training and education that was tailored and specified to the modern slavery risk that is most pertinent to Morrison.

These training programmes were structured in a manner to provide Morrison employees with an understanding of the issue of modern slavery generally and draw connections with the various operational and supply chain-related risks that were most pertinent to their work.

### ***Industry Collaboration***

Morrison has been a signatory to the PRI since 2010. We are also members of the Responsible Investment Association of Australasia ("**RIAA**") and sit on the Human Rights Working Group. Members of Morrison's sustainability team are past members of the Property Council industry working group on modern slavery where engagement and collaboration on modern slavery was industry leading at the time.

## Assessing the Effectiveness of Morrison's Approach

### **Morrison is committed to applying a disciplined, ongoing focus on the identification, monitoring and management of modern slavery risk.**

By refreshing the use of independent, data-driven software established in the previous reporting period, Morrison was able to track movements in our modern slavery risk exposure from year to year in a comparable manner.

With the refreshed supply chain mapping exercise from FairSupply, Morrison conducted a comparative analysis of the key quantitative metric, theoretical slaves per million dollars spent. This weighted metric ignores the amount spent with each supplier and instead provides an understanding of the inherent modern slavery risk presented by that supplier.

The number of theoretical slaves per million dollars spent increased this reporting period when compared to last year. This increase can be attributed to a number of factors including the increase in travel service providers in our supply chain, which was originally limited in the previous year's risk assessment as a result of travel restrictions during the COVID-19 pandemic. Additionally, the increases in theoretical slaves also align with the increases outlined by the International Labour Organisation's Global Estimates of Modern Slavery and Walk Free's Global Slavery Index respectively which demonstrated a significant increase since their last estimates in 2016 and 2018 respectively.

The confluence of these factors demonstrates a significant increase in the number of theoretical slaves, but Morrison remains committed to a deeper understanding of our suppliers to a greater extent. The qualitative analysis undertaken during this reporting period demonstrated a significant commitment by suppliers to implement modern slavery risk mitigation in their corporate governance and take proactive steps to combat it within their operations and supply chains.

In the event that an actual or potential incident of modern slavery is identified within Morrison's corporate or investment supply chain, it is treated in a similar manner to a material environmental or health and safety incident. Specifically, for incidents within Morrison's corporate supply chain, the incident is recorded via a Reportable Event Report, key stakeholders are notified, and we would seek to engage with that supplier to procure that measures are undertaken to mitigate any further occurrences. Following on from this, the incident would be reviewed to ascertain any further learnings that would support further improvements to risk management systems. Morrison engages with Portfolio Entities, primarily through the boards on which Morrison people sit, to procure that a similarly attentive approach is undertaken in relation to incidents within their supply chains and we are committed to continuous improvement in systems and processes (e.g., enterprise risk management) to minimise the risk of it being complicit in modern slavery violation.

Morrison has not formalised a remediation policy for modern slavery incidents at present. However, as typical of most large organisations with global operations, Morrison's global supply chain is long and complex. It is acknowledged that the identification of modern slavery risk will require ongoing attention. The Board is committed to reviewing the effectiveness of the requirements of its policies and position statements on an annual basis and reporting in accordance with the Act. Morrison is also committed to periodically reviewing modern slavery risks within its operations and supply chain to ensure its position remains current.

This Reporting Period also marks the inaugural year of Morrison's Modern Slavery Action Plan which sets out our strategy to continually improve our response of modern slavery risk on an annual basis. The actions and timeline set out in the Action Plan will provide Morrison with qualitative measurements on our progress and the efficacy of our strategy to continue to identify, assess and mitigate modern slavery risk in our operations, the investment management of our Portfolio Entities and our supply chains.



## Process of Consultation with Entities Owned or Controlled

**In this reporting period, Morrison undertook a consultative process across our corporate structure and with our owned and controlled subsidiary entities to better understand the modern slavery risk posed by our operations and our supply chains.**

It is important to note that Morrison's Australian employees sit under HRL Morrison & Co (Australia) Pty Limited and the other Australian entities that are owned (outlined on page 1) do not have any employees and are purely for financial transactions, reporting and governance requirements.

Morrison sought valuable insights from individuals across our corporate structure and who are responsible for various functions within Morrison including investment management of our clients' Portfolio Entities, our day-to-day operations and procurement. This was to form inclusive dialogue to develop a holistic approach to modern slavery risk within our operations and our supply chains.

By engaging with boards and key employees across our group, Morrison was able to share information, formulate a strategy and ensure a cohesive approach to the risk of modern slavery.

As an Investment Manager, Morrison does not own or have day-to-day operational control the Portfolio Entities which we manage on behalf of our clients however we undertake ongoing and sometimes extensive engagement with the Portfolio Entities on material ESG issues, including that of human rights and modern slavery.

## Next Steps

**Morrison recognises that modern slavery is a complex and challenging issue and our response to it will evolve over time as further information and insights are obtained.**

Future initiatives and actions to be undertaken by Morrison may include:

- Ongoing engagement with FairSupply to provide continued comparative analysis of modern slavery risk;
- Institute changes arising out of the review of the following policies conducted in this reporting period:
  - the Modern Slavery and Human Rights Position Statement;
  - the draft Supplier Code of Conduct; and
  - Service Provider & Outsourcing Policy.
- Ongoing delivery of initiatives as outlined in Morrison's Modern Slavery Action Plan.
- Ongoing industry collaboration with the PRI, RIAA and other industry working groups.

Morrison will strive for continual improvement across our organisation and supply chain and will update on our progress annually.

**Disclaimer:**

This modern slavery statement is made on behalf of the Australian subsidiaries of H.R.L. Morrison & Co Group LP (No. 2593342) ("MCO LP") ("Group") for the financial year ended 31 March 2023. It has been prepared pursuant to the requirements of the Australian Modern Slavery Act 2018. While the Group have endeavoured to ensure that all information provided in this statement is accurate and up to date at the time of publication, each takes no responsibility for any error or omission relating to this information. All forward looking statements are, by their nature, inherently speculative and always involve risk and uncertainty as they relate to events and depend on circumstances in the future, many of which are outside of the control of the Group. Therefore, actual results and outcomes may vary. Similarly, any past performance information contained in this statement is not an indication of future performance. It has not been audited or verified by an independent party and should not be seen as any indication of returns. Furthermore, the information provided does not constitute financial product advice under the Australian Financial Services Laws nor any other investment or business advice. To the maximum extent permitted by law, the Group will not be liable for any cost, loss or damage (whether caused by negligence or otherwise) suffered by you through your use of this statement.