

FY2024

# Modern Slavery Statement



**Prime Super**

Contents

1. About this Statement..... 3

2. Introduction ..... 3

3. About Prime Super ..... 3

4. Reporting entity and structure..... 3

5. Risks of modern slavery practices ..... 4

6. Our actions to assess and address these risks ..... 7

7. How we assess the effectiveness of these actions..... 8

8. Our consultation process ..... 9

9. Any other relevant information ..... 9

## 1. About this Statement

This Modern Slavery Statement ('Statement') is prepared and issued by Prime Super Pty Ltd ABN 81 067 241 016 as the Trustee of Prime Super ABN 60 562 335 823. The registered address for Prime Super Pty Ltd and Trustee is Level 24, 500 Collins Street, Melbourne, VIC 3000.

For the purposes of this Statement, the reporting entity, Prime Super Pty Ltd, and Prime Super are referred to as 'Prime Super', 'our' or 'we'.

Prime Super is committed to fulfilling its responsibilities under the *Modern Slavery Act 2018* (Cth) ('Act'). This Statement outlines the steps we have taken during the 1 July 2023 to 30 June 2024 financial year to assess and address modern slavery risks within our operations and supply chains.

This Statement has been approved by Prime Super's Board of Directors.

## 2. Introduction

Modern slavery encompasses severe forms of exploitation, including human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, deceptive recruiting for labour or services, and the worst forms of child labour. These practices constitute serious human rights abuses that responsible organisations are committed to addressing.

As a superannuation fund with more than \$100 million in revenue, Prime Super qualifies as a reporting entity under the Act. In fulfilling our obligations, we are taking measured steps to identify, assess, and mitigate modern slavery risks within our operations and supply chains. This Statement reflects our ongoing efforts to approach these risks responsibly and transparently, in line with regulatory expectations and our commitment to ethical practices.

## 3. About Prime Super

Prime Super is an independent profit-to-members superannuation fund. It has provided superannuation products and services for more than 30 years. Prime Super manages over \$7.5 billion in funds for over 146,000 members.

Prime Super is a multi-industry super fund open to all, including those employed in the following industries:

- recruitment;
- health;
- Agriculture;
- aged care; and
- education.

## 4. Reporting entity and structure

Prime Super is an Australian superannuation and pension fund operating under a Registrable Superannuation Entity Licence ('RSEL') L0000277 and an Australian Financial Services License ('AFSL') no. 219723. Our AFSL allows us to deal in and provide general financial product advice in relation to superannuation products.

Prime Super is incorporated in Melbourne and our head office is located at Level 24, 500 Collins Street, Melbourne VIC 3000. We also operate out of offices in New South Wales and Queensland. Prime Super is an independent entity and not part of a group of companies, nor does it own or control other entities for the purposes of the Act.

As at 30 June 2024, Prime Super employed a total of 49 employees and managed approximately \$7.5 billion in assets.

### Internal operations

Prime Super's core operation is providing retirement solutions to Australians, utilising a combination of in-house and outsourced functions.

Our day-to-day administration is outsourced to MUFG Pension & Market Services, while Patrizia Pty Ltd oversees the management of our investments.

### Supply chains

Our supply chain includes services and resources essential to our operations, and encompass:

- operations;
- administration;
- insurance;
- professional services and consultancy;
- investments (externally managed);
- marketing and communications;
- commercial leasing;
- staffing;
- information technology ('IT') and software;
- catering; and
- accommodation and travel.

For the period, our supply chain had minimal offshored functions occurring outside of Australia, the majority of suppliers and services were procured from within Australia and subject to Australian Law, employment standards and conditions.

## 5. Risks of modern slavery practices

In alignment with the Act, Prime Super has assessed potential modern slavery risks within our operations and supply chains. Our analysis considered risks related to the potential for causing, contributing to, or being directly linked to modern slavery practices.

### Risk identification in operations

Prime Super's internal operations primarily involve a professional, office-based workforce located in Australia. As such, we consider the risk of modern slavery within our direct operations to be low due to the established labour protections and regulatory oversight in the Australian market.

### Supply chain risk assessment

Prime Super engages a variety of suppliers across sectors, which include investment management, IT services, and professional consulting. We have identified that modern slavery risks may be more prevalent in certain supplier categories and geographical locations.

The table below outlines categories that may be used as part of our modern slavery assessment and supply chain selection:

| Risk category Prime Super's modern slavery risk |   |
|---|---|
| Country-based labour                            | Australia is categorised as low risk for modern slavery. According to the Global Slavery index 2023, Australia is ranked 26 out of 27 countries within the Asia and Pacific region in terms of modern slavery, and 149 out of 160 countries from a global perspective.  |
| Offshoring and manufacturing                    | During the reporting period, several of Prime Super's suppliers reported offshoring services or manufacturing to higher risk countries. In many cases these are professional services firms or regulated entities that conduct annual due diligence of their offshoring operations. In other cases, certain products sold by our suppliers are manufactured in higher risk countries, but represent a small portion of our overall expenditure. |
| Labour  | Given Prime Super's work profile, which adheres to Australian labour laws and excludes unskilled, temporary or migrant labour, our labour risk within operations remains low. We comply with all relevant labour protections to ensure safe and ethical working conditions in the provision of financial services to our members and in operating the fund.   |
| Commodity                                       | Certain commodities globally – such as textiles, minerals, and raw agricultural products – pose a heightened risk for modern slavery based on production methods and regions of origin. Prime Super's activities do not involve direct commodity production; however, we remain vigilant to these risks in our indirect supply chains.  |
| Category  | <p>Specific sectors, such as electronics manufacturing, garment production, cleaning, and construction are recognised for higher modern slavery risks due to characteristics of their labour-intensive production processes.</p> <p>Prime Super utilises electronics and facilities management (which includes an indirect supply of cleaning services) as part of commercial leasing arrangements.</p>   |
| Entity  | Prime Super does not engage with suppliers known to have poor treatment of workers or human rights violations. We consider a supplier's track record and practices when engaging in new relationships to mitigate potential risks.  |

**Risk category Prime Super's modern slavery risk**

|                       |  |
|-----------------------|--|
| Investments           | <p>Our investment portfolio spans Australian and international equity markets, including direct property, infrastructure, and private equity investments. Prime Super has investments across multiple sectors, including energy, IT, materials, financial services, property, healthcare, and telecommunications.</p> <p>The Asia-Pacific region is identified by the Responsible Investment Association Australasia ('RIAA') as having the largest concentration of individuals in conditions resembling slavery. High-risk sectors, as outlined by the RIAA include agriculture and fishing, apparel, construction and building materials, mining, and electronics and electronics recycling.</p> <p>Prime Super invests internationally and across various sectors. We work with our investment managers to understand how modern slavery risks within specific commodities and sectors are being identified and mitigated. Given that emerging markets, especially in the Asia-Pacific region, may present a higher risk for modern slavery, the majority of our emerging market investments are monitored in collaboration with our managers.</p> |
| Professional advisors | <p>Prime Super engages a range of professional advisors within Australia, including legal, accounting, and audit services. We assess the modern slavery risk within this area as low, given the nature of services provided and the regulatory environment in Australia. Nonetheless, we continue to undertake appropriate due diligence to identify and manage any potential modern slavery risks within this area.</p>   |

## 6. Our actions to assess and address these risks

Utilising the categorisations above, Prime Super has developed a modern slavery framework to assess and address our modern slavery risks. Key actions undertaken include:

- **Risk and compliance framework**  
We include modern slavery controls in our risk and compliance framework aligning our efforts with broader risk management practices.
- **Supplier due diligence and engagement**  
Prime Super conducts an annual modern slavery assessment, focusing on understanding modern slavery risks in both direct and indirect supply chains by reviewing published modern slavery statements or modern slavery positions. Where published statements or modern slavery positions are not available, we engage with suppliers to monitor these risks through questionnaires, company research and supplier due diligence.
- **Amount of supply chain captured**  
Our review of modern slavery statements and positions covered over 98% of Prime Super's supply chain based on expenditure, an increase compared to our 2023 review.
- **Contractual safeguards**  
We consider incorporating modern slavery-related clauses into supplier agreements to reinforce our commitment to mitigating risks.
- **Investment consultant evaluation**  
Engaging with our investment consultant to identify modern slavery risk.
- **Employee training**  
Prime Super conducts regular training sessions on modern slavery awareness to educate employees on identifying and reporting potential risks, building organisational awareness and vigilance.
- **Whistleblower reporting**  
We review cases reported through anonymous mechanisms, such as our whistleblower hotline, to respond to any suspected modern slavery concerns.

### Investments

Prime Super recognises the findings of the Global Modern Slavery Index 2023, identifying higher risks of modern slavery primarily within emerging markets due to inherent country-based and labour vulnerabilities. The following areas were recognised as having elevated modern slavery risks within extended supply chains:

- investments in the Asia-Pacific region;
- high-risk industry sectors; and
- emerging market economies.

To address these risks, if they are identified, Prime Super collaborates with our investment consultant to mitigate modern slavery risks. This includes engaging with directly held investee companies to manage modern slavery and human trafficking risks within their operations and supply chains.

Prime Super acknowledges the benefits of a continuous improvement approach to managing modern slavery risks in its investment portfolio. We remain committed to working with our investment consultant to monitor and respond to potential risks.

## 7. How we assess the effectiveness of these actions

Prime Super continues to identify and mitigate known modern slavery risks across our operations, direct supply chains, and investment portfolios. While our initial assessment categorises the modern slavery risk within our direct operations and supply chain as low, we recognise that risks may still exist within indirect and extended supply chains.

To evaluate the effectiveness of our modern slavery framework, Prime Super has implemented the following measures:

- **Periodic framework review**  
As part of this modern slavery review process, we consider our assessment methodology to ensure it remains relevant and effective in addressing risks.
- **Supplier engagement and monitoring**  
We work with material suppliers to assess their progress in addressing modern slavery risks. This is done through our annual supplier review process.
- **Monitoring of higher-risk suppliers**  
The modern slavery position for organisations involving high-risk countries and/or industries were more intensively scrutinised as there is a higher modern slavery risk in these areas.
- **Investment portfolio monitoring**  
We conduct periodic reviews of our investment portfolio to facilitate identification of modern slavery risks. This includes regular engagement with our investment consultant covering investment governance and stewardship.
- **Investment manager assessment**  
The selection process for new investment managers includes evaluating the robustness of each potential manager's framework for identifying and reporting on modern slavery risks. Existing managers undergo periodic reviews as part of our risk monitoring practices.
- **Internal compliance tracking**  
Ongoing compliance attestations are obtained asserting that modern slavery obligations are considered as part of the due diligence process when assessing potential suppliers and third parties.

Prime Super acknowledges the benefits of a continuous improvement approach to managing modern slavery risks and aims to meet regulatory standards and refinement of our processes towards best practice.



## 8. Our consultation process

Prime Super does not own or control any other entities for the purposes of the Act, and therefore the requirements of 16(1)(d) of the Act do not apply. The Board of Prime Super holds ultimate responsibility for overseeing and approving Prime Super's modern slavery statement. The day-to-day management of supplier sourcing and modern slavery risk is handled by the Executive Team and their delegates, with oversight from the Risk and Compliance team.

Throughout the risk assessment process, we consulted a diverse range of internal stakeholders to ensure a comprehensive approach. Key stakeholders involved include teams from Finance, Distribution, Marketing and Communications, Investments, Risk, Compliance and Legal.

This collaborative approach enables Prime Super to integrate insights from multiple functions, ensuring that our assessment and management of modern slavery risks are thorough and aligned with our organisational standards.

## 9. Any other relevant information

Prime Super remains vigilant regarding global events that may influence modern slavery risks within our operations and supply chains. The ongoing conflict in Ukraine and Gaza has led to significant displacement and increased vulnerability to exploitation. While Prime Super does not directly engage with suppliers operating in these areas of political instability, we recognise the potential for indirect impacts through global supply chains and remain attentive to these developments.

Prime Super is committed to reviewing and enhancing our modern slavery due diligence processes. We aim to minimise connections to supply chains in countries identified as high-risk for modern slavery and human rights violations.

This Statement has been approved by Prime Super's Board of Directors and signed by Chairman Nigel Alexander as a responsible member of the Prime Super.



Nigel Alexander  
Chairman

19 December 2024