



Insignia[®]
Financial

Modern Slavery Statement

Year ended 30 June 2025

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Message from our CEO

At Insignia Financial Ltd, we recognise the importance of respecting human rights and maintaining ethical practices across our operations and supply chains.

As the parent entity of our group of companies, we acknowledge our responsibility under the *Modern Slavery Act 2018 (Cth)* (the Act) to identify and manage risks related to modern slavery and human trafficking.

This Joint Modern Slavery Statement (the Statement) outlines the actions undertaken during the year ended 30 June 2025 (FY25), in accordance with the Act. Our approach continues to evolve, informed by internal assessments, stakeholder engagement, and developments in regulatory and reporting frameworks. According to the Australian Institute of Health and Welfare, in 2023-24, the Australian Federal Police received more reports of modern slavery than in any previous year¹, highlighting the need for ongoing vigilance.

In FY25, we:

- Enhanced our Investment Manager Questionnaire to focus on identifying and managing modern slavery risk.
- Simplified supplier onboarding and due diligence processes.
- Maintained a strong compliance culture, with 99% of employees completing modern slavery awareness training.

These activities form part of our broader Environmental, Social and Governance (ESG) approach and reflect our intention to integrate human rights considerations into business decision-making.

The Insignia Financial Ltd Board of Directors, on behalf of itself and the other reporting entities covered by this Statement, has reviewed and approved this Statement.



Scott Hartley

Chief Executive Officer

For and on behalf of Insignia Financial Ltd

¹ Australian Institute of Health and Welfare

About this statement

This Statement has been prepared by Insignia Financial Ltd and its reporting entities for the year ended 30 June 2025.

It outlines the approach of Insignia Financial Ltd, the reporting entities and the entities they own or control (collectively '**Insignia Financial**') to identifying and managing modern slavery risks across our operations and supply chains, and covers all entities listed in the Appendix.

The table below cross-references the mandatory criteria in section 16 of the Act with the relevant sections of this Statement, to assist readers in identifying how each requirement has been addressed.

Act Section	Requirement	Where addressed in Statement
s16(1)(a)	Identify the reporting entity	Appendix – Reporting Entities
s16(1)(b)	Describe the structure, operations and supply chains	Our structure, business operations and supply chain
s16(1)(c)	Describe the risks of modern slavery practices in operations and supply chains	Understanding our exposure to modern slavery; Modern slavery risk assessment – Corporate supply chain; Modern slavery risk assessment – Investment Manager supply chain
s16(1)(d)	Describe actions taken to assess and address those risks, including due diligence and remediation	Our actions to address modern slavery risks; Frameworks and policies; Remediation pathways
s16(1)(e)	Describe how effectiveness of actions is assessed	Our review of the effectiveness of actions
s16(1)(f)	Describe the process of consultation with entities owned or controlled	Our consultation process
s16(1)(g)	Any other relevant information	Conclusion; throughout as relevant
s16(2)	Details of approval by the principal governing body	Message from our CEO

Our structure, business operations and supply chain

Business structure and operations

Group Structure

Insignia Financial Ltd is a publicly listed company on the Australian Securities Exchange (ASX), headquartered in Melbourne, Victoria. It operates as the parent entity of the Insignia Financial group of companies which provides financial services across Australia under various brands and includes companies, superannuation funds and qualifying trusts specified in the Appendix.

Operations

The Insignia Financial consolidated group is a leading Australian wealth manager, providing financial advice, superannuation, wrap platforms and asset management services to members, financial advisers and corporate employers. The Insignia Financial consolidated group of controlled entities had \$330.3 billion in funds under management and administration (FUMA) as at 30 June 2025.

Our ambition is to create financial wellbeing for every Australian, which is founded upon our purpose of ‘understand me, look after me, secure my future’ and our principles and ways of working which place customers at the centre of everything we do.

The principal activities of the Insignia Financial consolidated group are:

 Financial Advice	 Master Trust	 Wrap	 Asset Management
Our employed advice businesses, Bridges and Shadforth, provide comprehensive financial advice.	As one of the largest superannuation and pension providers in Australia, we offer a number of award-winning solutions used by many of Australia's largest employers and independent advisers.	We have built a strong and contemporary technology platform and remain committed to investing in technology and services to support the changing needs of advisers and their clients.	We offer access to a broad suite of investment capabilities across a range of multi-asset and single asset classes, designed to suit a wide range of investor needs and risk profiles.

Our people

The Insignia Financial group employs a predominantly Australian-based workforce, comprising permanent and fixed-term employees, contractors, and authorised representatives. As of 30 June 2025, we had 3,774 direct employees, with 3,770 people across offices in Australia, in Melbourne (headquarters), Sydney, Hobart, Brisbane, Adelaide, Perth and other locations, and 4 based in the US. By head count, 3,336 of our employees are permanent full-time workers, 108 are fixed-term/max-term employees, and 290 are permanent part-time. There are 40 employees who are casual workers.

Our people play a critical role in delivering financial services to our clients and supporting the operations of our group. We maintain employment practices that are designed to uphold fair treatment, promote inclusion, and comply with Australian labour laws and workplace standards.

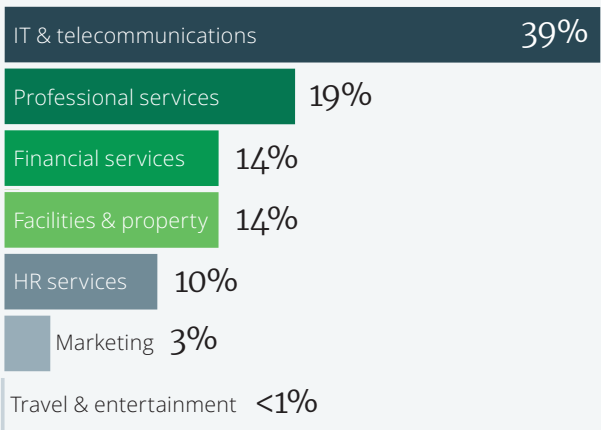
We consider the risk of modern slavery within our directly employed workforce to be low, due to the nature of our operations, the jurisdictions in which we operate, and the regulatory environment. Nonetheless, we continue to monitor employment practices and contractor arrangements to ensure they remain consistent with our expectations around ethical conduct and human rights.

Further information about Insignia Financial can be found at <http://www.insigniafinancial.com.au>

Corporate supply chain

In FY25, Insignia Financial engaged with 1,073 tier-one suppliers across our corporate operations to support the delivery of products and services to clients. During this period, we spent approximately \$614 million across these suppliers, ranging from large multinational corporations to small businesses. Almost 96% of this expenditure was allocated to businesses based in Australia.

The majority of our suppliers operate in information technology (IT) and professional services, with the key industry breakdown as follows (rounded):



In FY25, corporate suppliers based in Australia increased by more than 8% compared to FY24. The remaining suppliers were distributed across the United States and Canada (2.7%), Europe (1.1%), and the Asia-Pacific region (0.5%).

We continue to assess our corporate supply chain to better understand the nature and extent of potential modern slavery risks, particularly in sectors and geographies with elevated risk profiles. Our Supplier Code of Conduct outlines our expectations of suppliers in monitoring modern slavery risks in their businesses. In addition, our supplier onboarding and due diligence processes are designed to improve visibility into supplier practices and support ethical sourcing.

Investment Manager supply chain

Through our Asset Management business, we appoint a range of external Investment Managers to manage investment capital across various asset classes, industries, and jurisdictions. These Investment Managers invest in companies and assets that may operate within complex global supply chains, which can carry elevated modern slavery risks.

We consider these Investment Managers to be tier-one suppliers due to the nature of our commercial arrangements. Recognising the distinct risk profile associated with investment activities, we have a separate modern slavery monitoring process within our Asset Management business. This includes a tailored Investment Manager Modern Slavery Questionnaire, designed to assess how Investment Managers identify and manage modern slavery risks within their investment processes.

This approach reflects our intention to understand how human rights considerations are integrated into investment decision-making, rather than seeking to identify specific instances of modern slavery within portfolios. We continue to engage with Investment Managers to build transparency and encourage alignment with our expectations around responsible investment and human rights.

Understanding our exposure to modern slavery

As an Australian-based financial services provider, we consider the direct risk of modern slavery within our operations to be low. However, we acknowledge that indirect risks may arise through our corporate supply chain and through investments managed by our Asset Management business.

This risk is heightened when companies receiving capital from our appointed Investment Managers are located in high-risk regions or operate in industries known for a higher prevalence of modern slavery.

Most of our tier-one suppliers are based in Australia, where the inherent risk of modern slavery is considered lower.

As a result, we also assess the risk within our corporate supply chain as low. Nonetheless, we continue to monitor and review our exposure across both operational and investment contexts, recognising that risk can evolve over time and may be present deeper within supply chains or portfolios.

High-risk sectors are often those which are low-skilled, labour intensive, and have high proportions of migrant workers. The sectors at highest risk include :

Examples of high-risk modern slavery sectors for Australia include²:



Agriculture



Construction



Domestic work



Fishing



Logging



Mining

Given the distinct nature of our operational and investment activities, this Statement addresses modern slavery risks across two key supply chain categories: our corporate supply chain and our investment manager supply chain. Each presents unique risk profiles, governance structures, and engagement approaches. Accordingly, we assess and manage these risks through tailored frameworks and processes, which are outlined in the following sections.

We apply a structured, risk-based assessment framework to evaluate modern slavery risks across our supply chains. This framework considers supplier or manager

geographic location, industry classification, and spend level. It enables prioritisation of engagement, assignment of inherent risk ratings, and identification of areas requiring further due diligence.

For corporate suppliers, the assessment framework is supported by external data providers and integrated into our procurement systems. For investment managers, it is embedded within our due diligence processes and enhanced through tailored questionnaires that assess governance, supply chain oversight, and remediation capabilities.

Modern slavery risk assessment – Corporate supply chain

In FY25, we engaged with 1,073 corporate suppliers, a slight decrease from 1,162 in FY24. Applying our risk-based methodology, we excluded 179 suppliers from further assessment, including sole traders, government agencies, charities, internal accounts, and low-spend or duplicate profiles. This resulted in 894 in-scope corporate suppliers for further assessment regarding modern slavery risks.

In FY25 we continued to apply a structured, risk-based approach to evaluating corporate suppliers, factoring in geographic location, industry classification, and spend levels. This approach was further strengthened through refinements that allowed for a more nuanced

understanding of supplier risk profiles. By aligning assessment criteria more closely with the nature of services provided, the Procurement team was able to better identify suppliers operating in areas with elevated exposure to modern slavery risks, while also improving the efficiency and relevance of the overall evaluation process.

The updated framework and questionnaire now apply a more granular classification based on the specific services engaged throughout the year, allowing for improved identification of suppliers operating in sub-sectors with elevated modern slavery risks. The streamlined format has improved clarity, reduced supplier burden, and increased the relevance of responses.

Assessment results for inherent risks of modern slavery across the in-scope population of our tier-one corporate suppliers



New suppliers onboarded from February 2025 onwards achieved a 100% response rate, demonstrating the effectiveness of the revised approach in improving supplier engagement and enhancing the quality of insights drawn from data collected. These enhancements have created efficiencies which have enabled Insignia Financial to better allocate people resources, to strengthen supplier relationships, and improve processes in managing modern slavery risks across our supply chain.

No instances of modern slavery were identified in supplier responses.

High-risk suppliers will be engaged with throughout FY26 and remain on the watchlist within our modern slavery risk register until we are satisfied that they are managing these risks appropriately. We will continue to leverage our procurement technology and work with internal business stakeholders to gather information from suppliers who have

not yet completed the new modern slavery questionnaire, or who have not demonstrated controls to manage modern slavery risks. In line with our Modern Slavery Policy, we review supplier commercial relationships where supplier risk management doesn't meet our expectations.

In FY25, the Procurement Team engaged with the 24 suppliers who were registered on our watchlist following the FY24 corporate assessment process. The team worked with various business owners to identify key contacts and seek further information relating to their management of modern slavery risks.

This engagement resulted in all identified FY24 watchlist suppliers being removed, either through deregistration from our systems due to inactivity or reclassification to low or medium risk based on the new and more detailed classification methodology for supplier industries.

Modern slavery risk assessment – Investment Manager supply chain

In FY25 our objective was to focus on low-scoring or non-responsive managers, as well as to uplift due diligence across all investment manager relationships. We issued an enhanced Modern Slavery Questionnaire to 134 managers and received 132 responses – a 99% response rate, consistent with FY24. This compares to 95 managers engaged in FY24.

Using our enhanced questionnaire for investment managers, we focused on manager identification and management of modern slavery risks over what we believe to be within a managers control. Of the 23 questions, 6 questions were scored covering:

- ✓ Policies and processes for managing modern slavery risks in operations
- ✓ Supply chain risk management
- ✓ Remediation frameworks
- ✓ ESG integration of human rights risks
- ✓ Incident tracking and reporting
- ✓ Effectiveness monitoring

While we have only recently commenced this more comprehensive manager assessment process, pleasingly, eighty percent of managers met our baseline expectations (a score of 40% and over) on the scored questions listed above. The remaining 20% of managers who didn't meet baseline expectations had not experienced modern slavery in their portfolios or operational supply chain, but rather, they did not have risk management procedures in place. Encouragingly, over 75% reported having operational policies to manage modern slavery risks, despite only 39% being subject to mandatory reporting.

Nearly 70% assess modern slavery risks in their supply chains and integrate these into ESG frameworks. Additionally, 67% indicated plans to track and report incidents. While only two managers reported instances within their own operations, 20 managers identified issues within portfolio companies or deeper supply chains. Notably, only 47% have remediation policies in place – a critical capability should Australia move toward mandatory due diligence.

Investment managers with direct exposure to high-risk geographies

Of the 30 managers who confirmed direct investment exposure to high-risk geographies:



These results suggest growing awareness and integration of modern slavery risk management by investment managers but highlight a gap in formal remediation planning among managers with elevated exposure.

The questionnaire is designed to understand, assess, and influence an investment manager's risk management framework in assessing modern slavery risks, not to influence their investment strategy.

Actions for FY26

In FY26, we plan to refine questionnaire language to better distinguish between risks in managers' own operations and those within supply chains of portfolio companies. We also aim to clarify "ESG integration" to encourage a broader understanding of modern slavery as a human rights issue requiring active management. These updates will support improved response quality and stronger oversight across investment portfolios.

In FY26 we also plan to engage with managers who did not meet our baseline requirements, to encourage improvements in modern slavery oversight within their risk management frameworks.

Our actions to address modern slavery risks

Insignia Financial is an Australian-based financial services organisation with a workforce largely consisting of directly employed professionals. Our employees’ terms and conditions are established in employment contracts that align with relevant employment laws.




The Insignia Financial Code of Conduct outlines the values and standards of behaviour expected of all employees, supporting our client-focused mission. The Code, alongside complementary corporate policies, promotes ethical practices and supports the selection of reputable and professional suppliers and service providers.

To further strengthen governance, we have implemented a Whistleblower Program, providing a secure and confidential avenue for reporting concerns about business practices. All reported matters are reviewed and/or investigated impartially, with appropriate corrective action taken as necessary.

Frameworks and policies

We rely on strong risk management frameworks to identify and address modern slavery risks across our organisation. We apply a Three Lines of Accountability model to support the identification, assessment, and management of these risks.

‘Three lines of accountability’ model

 First line Business management	Business management are risk owners and are accountable for identifying, understanding and managing the risks inherent in the products, services, activities, processes and systems that they are responsible for. The Group Risk & Compliance Committee receives reporting from management on significant areas of first line risk.
 Second line Risk management function	The Risk Management function, led by the Chief Risk Officer, is accountable for the development, maintenance and enhancement of the Risk Management Framework. Risk Management also supports the first line in its risk management responsibilities by providing independent review and challenge of activities and decisions.
 Third line Independent assurance	Group Internal Audit are accountable for providing independent and objective assurance on the design and operating effectiveness of Insignia Financial’s governance, risk management and internal control processes. This may include other independent reviews commissioned by the Board.

Our key policies and statements related to addressing modern slavery risks include:

- Modern Slavery Policy
- Supplier Code of Conduct
- Procurement Policy
- Whistleblower Policy
- Anti-Bribery and Anti-Corruption Policy
- Diversity, Equity and Belonging Policy
- Responsible Investment Statements and Policies

Modern Slavery Policy

Our Modern Slavery Policy defines our approach to minimising the risk of modern slavery within our operations and supply chain. Compliance with the Modern Slavery Policy is mandatory for all employees, establishing clear responsibilities in identifying and mitigating modern slavery risks.

The Policy seeks to embed a structured and risk-based approach to identifying, assessing, and managing modern slavery risks across Insignia Financial's operations and supply chains. It outlines our zero-tolerance stance, links to supporting frameworks such as the Supplier Code of Conduct and procurement procedures, and sets expectations for supplier due diligence, risk register maintenance, and remediation planning. The Policy also supports continuous improvement through training, governance oversight, and alignment with broader ESG objectives.

The Modern Slavery Policy is reviewed annually for relevance and any significant updates are assessed at the Policy Day, before being approved by the Insignia Financial Board.

Supplier Code of Conduct

In FY24, we introduced an updated Supplier Code of Conduct, which establishes expected standards of behaviour for all suppliers in alignment with our values and principles.

Suppliers are required to:

- Not engage in modern slavery practices in their operations or supply chains.
- Take reasonable steps to identify, assess, and address any risks or occurrences of modern slavery in their supply chains.

The Supplier Code of Conduct is publicly available on our corporate website.

Responsible Investment statements and policies

Our responsible investment approach applies ESG principles across our investment and superannuation business.

Our Responsible Investment Policy Statements define the role of ESG considerations in the assessment, selection, and monitoring of externally appointed investment managers. These statements outline several ESG risks considered as part of this framework, including:

- Human capital management
- Labour standards
- Modern slavery
- Diversity, equity and belonging
- Workplace health and safety

The consideration of these ESG risks in our investment process is enhanced by our annual process of modern slavery risk assessment and engagement with our investment managers.

Governance and accountability

Board oversight

The Insignia Financial Ltd Board (the Board) acknowledges that effective risk management is crucial for strong governance and fundamental to our ongoing growth and success. The Board holds ultimate responsibility for overseeing our risk management framework.

The Board has established a Group Risk & Compliance Committee (GRCC) to monitor and receive assurance that:

- An appropriate and effective risk management framework is in place for identifying, assessing, mitigating, and monitoring material risks.
- Effective compliance policies, procedures, and frameworks are in place to manage relevant obligations.
- Operations are conducted in accordance with these policies and frameworks.
- Management devotes appropriate attention to compliance and risk management issues.

In FY25, ESG Risk reports were tabled to the GRCC at least bi-annually, including updates on modern slavery risks and mitigation actions.

Modern Slavery Working Group

During FY25, our cross-functional Modern Slavery Working Group continued to meet to support the integration of modern slavery monitoring into business-as-usual practices, following the completion of our five-year Maturity Plan in FY24. The group played a key role in coordinating internal efforts, reviewing supplier and investment manager engagement outcomes, reviewing the Modern Slavery Policy and contributing to the development of this Modern Slavery Statement.

The Working Group includes representatives from legal, risk, procurement, ESG and asset management functions, ensuring a collaborative and informed approach to addressing modern slavery risks across the organisation.

Training and awareness

We equip our employees with training and resources to help them identify, address, and report issues related to modern slavery. Each year, all employees are required to complete general awareness training on modern slavery, which includes guidance on our Modern Slavery Policy and outlines steps to take if any suspected or actual case is identified.

In FY25, we achieved a 99% completion rate for this training module, reflecting strong employee engagement and our commitment to risk mitigation.

We also maintain a dedicated intranet site that provides employees with additional information on modern slavery, including links to our Modern Slavery Statement, Modern Slavery Policy, and relevant procedures. Employees are encouraged to report concerns via a dedicated mailbox.

Remediation pathways

Should any instances of modern slavery be identified within our operations or supply chain, Insignia Financial maintains processes to remain prepared to respond appropriately should concerns arise. Concerns are triaged and escalated through our existing governance channels, including the Modern Slavery Working Group where appropriate. Reports can be made confidentially through our Whistleblower Program or via our modern slavery reporting mailbox. Where credible concerns are raised, we assess the issue, engage with the relevant party, and determine appropriate actions, which may include further due diligence, corrective action plans, or disengagement. Learnings from any remediation activity are used to strengthen our policies and practices.

Corporate supply chain management

More than two years since its implementation, our digital procurement system continues to play a central role in monitoring modern slavery risks across the corporate supply chain. The system automates the issuance and collection of modern slavery questionnaires, applies inherent risk ratings to suppliers, and supports a streamlined due diligence process. Ongoing enhancements have further strengthened its effectiveness, enabling our teams to engage more efficiently with suppliers and focus resources where they are most needed.

The Procurement Team has strengthened the supplier onboarding process by streamlining system workflows and introducing an improved modern slavery questionnaire. These updates have made it easier for suppliers to provide accurate and relevant responses, resulting in a 100% questionnaire response rate for all new suppliers onboarded since February 2025.

Maintaining accurate and up-to-date supplier data remains critical to our ability to monitor and address modern slavery risks. The Procurement Team continues to demonstrate a strong commitment to data integrity, particularly through its support of improvements to our modern slavery risk assessment framework.

Investment Manager supply chain management

In June 2024, our Asset Management business implemented a new due diligence, risk, and compliance platform to enhance oversight of investment manager operations and their supply chains. This internationally recognised, automated database supports the evaluation of operational due diligence and is now embedded in our ongoing processes.

As part of our strategy to continuously strengthen our responsible investment practices, all modern slavery assessments for investment managers are now conducted through this platform. Responses are automatically scored based on the quality of information provided by investment managers.

This enhanced process enables us to better identify trends across asset classes, industries, and geographies, allowing for more targeted engagement and risk mitigation across the business.

Improvement planning

We continue to take a risk-based maturity approach to managing and assessing modern slavery risks in our supply chain. This approach has led to greater engagement with our suppliers and investment managers, enhancing our ability to monitor and detect potential modern slavery risks.

Our review of the effectiveness of actions

Key achievements in FY25

In FY25, we strengthened our approach to modern slavery risk management by embedding key practices and systems across our operations and supply chains.

People

- Embedded modern slavery awareness into our ongoing compliance training program, achieving a 99% completion rate across all employees, including client-facing and supplier-facing roles.
- Continued to report on modern slavery monitoring in line with the FY26 Sustainability Strategy, approved by the Board in September 2024.
- Maintained modern slavery-related Key Performance Indicators (KPIs) within annual goals for the Head of ESG, Supplier Management, and Procurement teams, reinforcing accountability across key functions.

Process

- Embedded modern slavery monitoring into business-as-usual processes for both corporate and Investment Manager supply chains.
- Improved supplier onboarding through simplified questionnaires and clearer guidance.
- Maintained public transparency through the Insignia Financial Sustainability & Impact Report, which includes disclosures on modern slavery risk assessment and management.
- Bi-annual reporting of modern slavery risks to the GRCC, ensuring ongoing oversight and integration into enterprise risk governance.

Systems

- Operationalised our digital procurement platform, automating supplier onboarding and risk assessments.
- Implemented a new due diligence platform for investment managers, enabling automated scoring and trend analysis.

Governance

- Maintained strong oversight through the GRCC, with bi-annual reporting on modern slavery risks.
- Approved updates to key policies, including the Modern Slavery Policy and Supplier Code of Conduct, to reflect enhanced risk management expectations.

Engagement

- Achieved a 100% completion rate for modern slavery assessments for all new suppliers onboarded from February 2025.
- Improved the quality of supplier responses, particularly from material service providers, through clearer guidance and streamlined processes.
- Engaged with Investment Managers to assess and improve their modern slavery risk management practices, supported by new systems and data insights.

Future actions



In FY26, we will continue to strengthen our approach to modern slavery risk management by focusing on the following priorities:

- **Supplier engagement:** Deepen engagement with suppliers identified as higher risk through our digital procurement system, with targeted follow-up and support.
- **Investment Manager oversight:** Expand use of our due diligence platform to monitor modern slavery risks across asset classes and geographies, with automated scoring and reporting.
- **Data and reporting:** Enhance internal reporting capabilities to better track risk indicators and inform decision-making across procurement and investment functions.
- **Training and accountability:** Refresh modern slavery training materials and embed updated KPIs for relevant teams to reinforce ownership and continuous improvement.
- **Industry collaboration:** Continue active participation in industry bodies such as the Financial Services Council (FSC) and Responsible Investment Association Australasia (RIAA) to align with best practice and contribute to sector-wide uplift.

Our consultation process

This Joint Modern Slavery Statement has been approved by the Board of Insignia Financial Ltd.

In preparing this Statement, Insignia Financial Ltd consulted with each of the reporting entities covered by the Statement, as well as applicable entities they own or control. The respective Boards of these entities were provided with updates on modern slavery risk management activities and approved their inclusion in this Statement.

Throughout FY25, the Insignia Financial GRCC received updates on modern slavery risk monitoring and mitigation activities across our supply chains.

Input was also received from the cross-functional Modern Slavery Working Group, which includes representatives from our legal, risk, procurement, ESG and asset management functions.

In addition to internal consultation, we engage with external stakeholders to inform and strengthen our approach to modern slavery risk management. This includes ongoing dialogue with suppliers and Investment Managers through our due diligence processes, as well as participation in industry bodies such as the FSC and the RIAA. We recognise the importance of broader engagement, including with civil society organisations and investor groups, and will continue to explore opportunities to collaborate more widely across the sector to support ethical practices and continuous improvement.

Conclusion

Insignia Financial remains committed to respecting human rights and addressing modern slavery risks across our operations, supply chains, and investment activities. FY25 marked a year of consolidation and uplift, with enhanced systems, stronger governance, and deeper engagement with suppliers and Investment Managers. In FY26, our focus is on embedding these practices into business-as-usual and continuing to evolve our approach in line with regulatory developments and stakeholder expectations. We will maintain transparency, foster collaboration, and pursue continuous improvement to support ethical and responsible business conduct across our value chain.

Appendix – Reporting Entities

This is a Joint Modern Slavery Statement under section 14 of the *Modern Slavery Act 2018* (Cth) and covers the reporting entities listed below.

These entities are included for the purposes of this Statement and comprise corporate entities within the Insignia Financial Ltd group, as well as superannuation funds and managed investment schemes owned or controlled by Insignia Financial Ltd.

Company	ABN
Insignia Financial Ltd	49 100 103 722
Australian Wealth Management Limited	53 111 116 511
I.O.O.F. Investment Management Limited	53 006 695 021
IOOF Investment Services Ltd	80 007 350 405
IOOF Service Co Pty Ltd	99 074 572 919
MLC Investments Ltd	30 002 641 661
MLC Wealth Limited	97 071 514 264
NULIS Nominees (Australia) Ltd	80 008 515 633
Oasis Asset Management Limited	68 090 906 371
OnePath Custodians Pty Ltd	12 008 508 496
Shadforth Financial Group Limited	27 127 508 472

Super fund	ABN
AvWrap Retirement Service Superannuation Fund	82 004 832 237
IOOF Portfolio Service Superannuation Fund	70 815 369 818
MLC Super Fund	70 732 426 024
Oasis Superannuation Master Trust	81 154 851 339
Retirement Portfolio Service	61 808 189 263

Responsible Entity	Trust	ARSN
OPFM	OptiMix Wholesale Global Emerging Markets Share Trust	120 609 216
OPFM	OneAnswer – OnePath International Shares Index Trust	101 400 757
OPFM	OptiMix Wholesale Balanced Trust	091 108 628
OPFM	OneAnswer – OnePath Australian Shares Index Trust	104 467 469
OPFM	OneAnswer – OnePath Balanced Index Trust	142 352 592
OPFM	OneAnswer – OnePath Growth Index Trust	142 354 087
OPFM	Smart Choice Wholesale Alternatives Growth Trust	unregistered
OPFM	OnePath Australian Shares Index Pool	unregistered
OPFM	OnePath Global Shares – Large Cap (Hedged) Index Pool	unregistered
OPFM	OnePath Global Shares – Large Cap (Unhedged) Index Pool	unregistered
IISL	Strategic Australian Equity Fund	133 312 820
IISL	Strategic International Equity Fund	133 308 219
IISL	MLC MultiSeries 50	614 698 314

Responsible Entity	Trust	ARSN
IISL	MLC MultiSeries 70	118 190 613
IISL	Multi Series Wholesale Australian Equities Trust	614 051 428
IISL	Multi Series Wholesale International Equities Trust	614 051 384
IISL	MultiMix Wholesale Australian Shares Trust	093 527 345
IISL	MultiMix Wholesale International Shares Trust	093 528 511
IISL	MLC Cash Management Trust	105 788 501
IISL	IOOF Income Trust	105 788 387
IISL	IOOF Balanced Investor Trust	unregistered
IISL	MLC MultiActive Balanced	130 097 059
IISL	MultiMix Wholesale Diversified Fixed Interest Trust	093 526 026
IISL	Multi Series Wholesale Fixed Income Trust	614 051 393
MLCI	MLC MasterKey Unit Trust Balanced Portfolio	087 944 625
MLCI	MLC MasterKey Unit Trust IncomeBuilder	087 944 287
MLCI	MLC Horizon 7 Trust	167 804 668
MLCI	Horizon 4 Balanced Portfolio	087 446 375
MLCI	Passive Australian Share Trust	136 061 697
MLCI	Passive Global Share Trust	136 061 357
MLCI	Diversified Australian Share Trust	087 780 532
MLCI	Diversified Global Share Trust	087 779 173
MLCI	Diversified Global Share Trust with Currency Hedged	087 779 520
MLCI	Integrated Separately Managed Account	138 086 889
MLCI	WM Pool – Equities Trust No. 34	unregistered
MLCI	WM Pool – Global Equities Trust No. 6	unregistered
MLCI	WM Pool – Equities Trust No. 74	unregistered
MLCI	WM Pool – Equities Trust No. 75	unregistered
MLCI	WM Sector – Australian Equities Trust	unregistered
MLCI	WM Sector – Diversified Debt (All) Trust	unregistered
MLCI	WM Sector – Diversified Debt (Short) Trust	unregistered
MLCI	WM Sector – Global Equities (Hedged) Trust	unregistered
MLCI	WM Pool – Australian Equities No.2	Unregistered
MLCI	Fairview Equity Partners Emerging Companies Fund	133 197 501
MLCI	MLC Index Plus Balanced	618 813 059