

HOSTPLUS MODERN SLAVERY STATEMENT









As a national superannuation fund with offices in every state and territory around Australia, we recognise Aboriginal and Torres Strait Islander peoples as the Traditional Owners of the lands on which we live and work, who have maintained and protected these lands and seas for thousands of years. We pay our respects to Elders, past, present and emerging, and we extend this acknowledgement to all Aboriginal and Torres Strait Islander peoples today.



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CEO and Chair message





Hostplus remains focused on our commitment to reducing modern slavery risk in our operations, supply chain and investments. Modern slavery encompasses a range of practices that include trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour. These activities are in stark contrast to our values as a superannuation fund and we oppose all forms of modern slavery.

As Australian superannuation assets continue to grow (to \$3.3 trillion¹ at the end of the reporting year), our role as an industry to protect the vulnerable grows. As a growing fund, Hostplus takes this responsibility seriously and has committed to strengthening our approach to reduce the risk of modern slavery in our operations and investments. In our endeavour to continue to improve the way this risk is addressed and mitigated, we continue to make progress with the actions committed to in our inaugural statement. Modern slavery is a pervasive and growing global problem. Our vision and goal is resolute in continuing to build internal processes to effectively identify and eradicate modern slavery in our operations and supply chain and actively play our part in a business community collectively tackling this issue. Ultimately, we believe this is good business and in the best interests of our members which is at the heart of everything we do.

We recognise that there is work to do. We are committed to implementing our framework and embedding more robust controls against modern slavery risk.

Dan A.

David Elia Chief Executive Officer

Damien Frawley Chair of the Board

1. The Australian Prudential Regulation Authority (APRA) Quarterly Superannuation Performance publication for the June 2022 quarter (published 23 August 2022).

Our Modern Slavery framework

Modern slavery practices, as outlined in the Modern Slavery Act, are illegal. As a result, they are unlikely to be in plain sight. Hostplus' response, underpinned by clear governance and accountability, has sought to address these risks through our Modern Slavery framework.

Hostplus Governance and Policies:

Our Risk team, together with our Head of Responsible Investments, has the overall responsibility for managing the Hostplus modern slavery response. The activities that support this function lie with the relevant Hostplus Business Units. In addition, Hostplus has a governance structure and policies in place that guide our commitments and priorities.

Board Oversight:

Ultimate accountability and oversight of modern slavery risks sits with the Hostplus Board. The Board has been engaged in Hostplus' efforts to identify, assess and mitigate modern slavery risks within our operations, and oversees the modern slavery framework.

Modern Slavery Working Group:

The working group, with Group Executive sponsorship, manages and oversees Hostplus' response to the Modern Slavery Act and addressing modern slavery risks. The working group seeks to enhance the understanding of modern slavery risks within our supply chain (including investments) and designs and implements appropriate actions in response.

Third Party Management Framework:

The Framework, together with supporting policies, provide guidance and oversight in relation to the appointment and ongoing monitoring of all third parties. This includes ensuring that modern slavery risks are assessed prior to entering into new or renewed agreements with suppliers.

Hostplus' Responsible Investment Policy:

The Policy outlines the principles that direct Hostplus' approach to responsible investment. It specifically identifies human rights and labour rights, including modern slavery, as part of Hostplus' approach to responsible investment.

Whistle-blowing Program:

The Policy helps to identify unacceptable workplace practices and to assist in remedying any improper conduct. All Hostplus employees, contractors and others are provided access to our whistleblower Hotline Service. The whistle-blowing program provides a confidential, secure, 24/7/365 service through an independent organisation with whistle-blower protections provided under the law.

Code of Conduct Policy:

The Policy sets out Hostplus' expectations and requirements of its directors and staff including contractors. It covers their responsibilities and obligations relating to various matters including confidentiality, privacy, conflicts of interest and other principles and behaviours.

Modern Slavery Policy:

The Board approved policy sets out Hostplus' obligations under the Modern Slavery Act including how it will address modern slavery risk in its operations and through its supply chains, and comply with its disclosure obligations through the lodgement of a Modern Slavery Statement on an annual basis.

Our progress in FY22

Hostplus is committed to progressing our Modern Slavery framework which helps to assess, manage and remediate our exposure to modern slavery. The Hostplus Modern Slavery Working Group (Working Group) continues to drive key activities and deliverables and ongoing compliance with the Modern Slavery Act.

Focus area	Progress in FY22
Governance and Policies	 Invested in an industry leading Governance, Risk and Compliance (GRC) system which will enable further maturity in the management of modern slavery risk faced by the organisation Ongoing assessment, identification and where necessary, remediation of modern slavery risk Implemented a Modern Slavery Policy to support the ongoing management of modern slavery in our operations.
Risk assessments	 Ongoing annual risk assessments for existing suppliers using a risk-based approach Ongoing annual risk assessment for Hostplus' investment portfolio.
Training and awareness	 Continued to provide training for relevant staff to carry out their duties in relation to identifying and mitigating modern slavery risk The embedding of a robust assessment process has resulted in greater awareness internally and among suppliers and investment managers as evidenced by greater coverage of risk assessments across third parties.
Assessing effectiveness	 An audit of Hostplus' Third-Party Management Framework, will form part of future assurance activity.
Grievance and remediation	 Heightening awareness about reporting incidents coupled with a robust incident reporting and management process positions Hostplus well to identify and take appropriate action on Modern Slavery related incidents.
Investments	 Continued identification of, and engagement with, high risk companies via specialist service providers. Read more about this on page 17 Direct engagement with our investment managers has resulted in enhanced reporting of modern slavery risk identification and remediation within our investments portfolio. Following Hostplus engagement, some managers have increased their maturity in modern slavery risk management approaches by uplifting their formal modern slavery policies, risk identification tools and training programmes to guide company engagement.







Our structure, operations and supply chain

About Hostplus

Host-Plus Pty. Limited is the Trustee for the Hostplus Superannuation Fund (the Fund) and the Hostplus Pooled Superannuation Trust (the PST). The Fund was established in 1988 and is a profit-to-member superannuation fund with origins in the hospitality, tourism, recreation and sports sectors. The Fund's vision is to continue to evolve to be the lifetime fund of choice for all Australians, delivering retirement income security to our members. The PST is designed to pool assets of eligible complying superannuation entities to invest in high quality assets managed by the Trustee and selected external investment managers on behalf of the Fund and other external superannuation entities.

Hostplus offices are located Australia wide with our head office in Melbourne. This national presence allows us to reach our members in communities across the country.

Reporting Entity, Structure, Governance and Consultation

This Modern Slavery Statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth) (Modern Slavery Act). It is the third annual statement made jointly on behalf of the Hostplus Superannuation Fund and the Hostplus Pooled Superannuation Trust (jointly, Hostplus) for the financial year ended 30 June 2022.

Host-Plus Pty. Limited as trustee for the Hostplus, comprises:

- The Hostplus Superannuation Fund (the Fund), currently one of Australia's largest industry funds with over 1.6 million members, 273,000 contributing employers, 344 Hostplus employees and \$80 billion in funds under management (as at 30 June 2022); and
- 2. The Hostplus Pooled Superannuation Trust (the PST). The PST is a pooled superannuation trust as defined under the Superannuation Industry (Supervision) Act 1993 (SIS Act). Currently the PST manages \$86 billion in funds under management (as at 30 June 2022). The PST is governed by the terms of the Hostplus Pooled Superannuation Deed (Trust Deed) (dated 3 February 2022) and any subsequent amendments and relevant law. The Host-Plus Pty Limited Board, as trustee for the Fund and the PST, has approved this statement.

The figure below depicts Hostplus' General Structure including the Fund and the PST.



The Fund and the PST are governed and managed by our Trustee Board (the Board). The Board represents our members in accordance with the relevant Trust Deed and superannuation law.

Ultimate accountability and oversight of modern slavery risks is held by the Hostplus Board. The Board has been engaged in Hostplus' efforts to identify, assess and mitigate modern slavery risks within our operations. As the trustee responsible for the overall governance and strategic direction of the Fund and the PST, Hostplus has consulted with senior management representatives from both the PST and the Fund in preparing this statement.

This statement does not cover activities where Hostplus is an investor or participant in a joint venture without an active role in operational matters, other than to the extent investments are considered as part of the supply chain. Hostplus has not actively consulted with the management of these investments or with joint venture partners other than as part of the supply chain risk assessment.





Operations at a glance

Hostplus seeks to deliver retirement income security to its members with an overarching strategic objective of optimising member outcomes for retirement. For over 30 years we have been providing our members with the following products and services so they can look forward to optimised retirement outcomes:

- Account administration services
- General advice
- Financial advice
- Insurance (income protection, death and TPD)
- Member education services
- Investment options which cater for various risk appetites.

Hostplus' main areas of operation



Supply chain at a glance

In order to improve efficiencies and value for our members, Hostplus uses a combination of in-house and outsourced functions. The following functions are outsourced to specialist third parties:

- Administration and member services for all Hostplus products
- Insurance
- Custodian services
- Investment management
- Information technology managed services, including information security
- Internal audit.

We also maintain relationships with other third-party suppliers including financial institutions, asset consultants, IT vendors and firms specialising in marketing, digital, consulting, property management, and legal services.

Accordingly, third party relationships and supply chain risk management are critical to Hostplus' response in addressing modern slavery risks.





Our structure, operations and supply chain



Investments at a glance

Hostplus' focus is on delivering the best retirement outcomes for our members. We invest for the long term across a broad range of asset classes such as listed shares, property, infrastructure, credit, alternatives and private equity, which includes venture capital.

We are committed to responsible investment across all our investment activities. Our Responsible Investment Policy specifically identifies the consideration of human rights and labour rights, inclusive of modern slavery, as part of our approach to responsible investment.

In order to deliver our investment strategy, we engage with a range of experienced, specialist investment managers to invest on the Fund's behalf. Using external investment managers allows us to take advantage of their skill sets and deep access to investment opportunities to maximise future returns. Investment managers are appointed by the Board after thorough due diligence is undertaken, and with the endorsement of the Fund's investment adviser. Once appointed, investment managers and the underlying investments are monitored on an ongoing basis.

Principles for Responsible Investment rating

We received a rating of 4 out of 5 stars for our responsible investment and stewardship policy from the Principles for Responsible Investment (PRI)¹. Supported by the United Nations (UN), PRI is an independent body and the world's leading advocate for responsible investment. Read more about PRI on our website.



121 319 **Investment products** Investment managers S86b 23 \$ Funds under management, Person includes Hostplus Super Investment team Fund and other investments **Unlisted assets** Property Infrastructure Private equity Investment adviser Credit JANA Investment **Asset classes** Alternatives Advisers Pty Ltd **Listed equities Bonds and cash** Diversified Australian equities fixed interest International equities - Developed markets

- International equities – Emerging markets
- Cash



Custodian **Citigroup Pty Limited**

Modern Slavery risk in our operations and supply chains

Risk assessment process

Hostplus understands that 'risk' when referring to modern slavery refers to the risk to people. Risk to people relates to the severity of modern slavery practices, the likelihood of them occurring and the number of people affected over a period of time.

Therefore, when undertaking a risk assessment, our primary focus has been on factors that give rise to risk to people. To identify areas of higher risk of modern slavery existing within our business practices or supply chain, Hostplus considers four key factors: high-risk geographies², high-risk sectors³, vulnerable populations⁴, and business models structured around high-risk work practices⁵.

Hostplus' ongoing risk assessments are conducted in relation to:

- 1. Hostplus internal operations
- 2. Hostplus external operational supply chain
- 3. Hostplus externally managed investments.



Risks in operations and supply chain



Operations

Hostplus' direct operations are solely conducted in Australia. All Hostplus employees, including those who have joined as part of the Intrust Super and Statewide Super mergers, are directly employed under an Enterprise Agreement and are covered by their employment contracts. Based on the sector, business model and employee arrangements Hostplus has adopted in Australia, the risk of modern slavery in Hostplus' direct operations remains low.



Modern Slavery risk in our operations and supply chains



Supply Chain

Following the initial assessment of our suppliers for modern slavery risk, Hostplus has maintained the assessment process for all new suppliers onboarded or renewed. Each supplier risk assessment is based on the exposure of that supplier to the four risk factors listed above and the mitigating controls in place to reduce the risk.

We also consider broader factors such as the size of the entity, the number of employees, and the operations of the organisations as they relate to Hostplus.

The tailored questionnaires for our suppliers continue to focus on two main components: The first section of the questionnaire is applicable to all suppliers and relates to their operations and supply chains, including the identification of any high-risk indicators. The second section is applicable to specific sectors to ascertain further information relating to potential modern slavery risks within a higher risk sector such as financial services, housekeeping/facilities and electronics manufacturing. Positively, as a result of the risk assessments being embedded in our processes for an extended period of time, suppliers have continued to become more responsive and cooperative.

All Hostplus contractual agreements now reflect modern slavery obligations.

Our ongoing assessments still reflect the below risk areas in Hostplus' supply chain:

Offices	Hostplus has offices across Australia which require cleaning and facilities management. Building management services has been identified as a relatively higher risk service within Australia.
IT & technology	Hostplus uses a range of technology hardware and services. These suppliers have been identified as higher risk due to offshore or outsourced operations in high-risk countries or supply chain component materials and manufacturing.
Professional services	Hostplus has relationships with local and international professional and financial services firms, some of whom have offshore or outsourced operations in high-risk countries.
Community partnerships	Hostplus supports community partners whose supply chains have exposure to the hospitality and apparel sectors. These sectors have been identified as higher risk within Australia.

Modern Slavery risk in our investments

One of the key areas of Hostplus' supply chain where modern slavery may exist is within our investment portfolio. The Hostplus PST uses 121 investment managers across 10 asset classes. To manage environmental, social and governance (ESG) risks, including modern slavery risk, within our portfolio, Hostplus enlists the support of external service providers, including specialist ESG advisers and our asset consultant, JANA.

Hostplus utilises the services of Australia Council of Superannuation Investors (ACSI) and EOS at Federated Hermes (EOS) for in depth research and constructive engagement with companies we invest in. We encourage them to operate in a manner whilst also responsibly contributing to positive outcomes for society and the environment.

Hostplus has the following key engagement workstreams in place to understand the modern slavery risks within our investments:

- 1. Engagement with investment managers
- 2. Engagement with Australian companies through membership of the ACSI
- 3. Engagement with International companies through EOS.

Hostplus' engagement with investment managers

Similar to the process for Hostplus' operational supply chain, to understand Hostplus' exposure to modern slavery risk within our investments we assessed and rated each of our investment managers and their underlying portfolios based on the previously identified four risk factors. Ratings are based on the level of risk inherent within portfolio companies and the mitigating controls in place to reduce the risk.

We developed questionnaires for our investment managers, tailored to the asset class of the investment and whether we invest via a mandate specific to Hostplus or a pooled fund. The questionnaire comprises two sections; the first focussed on the manager's operations and supply chain and the second focussed on the manager's investments made on behalf of Hostplus and covers:

- Exposure to high-risk countries, geographies, business models and employment of vulnerable people (and for government bonds, high-risk governments⁶)
- Approach to assessing modern slavery risk within investee companies and assets
- Processes to address identified risks
- Processes for tracking, managing and reporting incidents.

6. Based on Tier 1 (highest risk CCC to D) governments using the Global Slavery Index 2018, Table 1 – Government Response rating, p.45. Modern Slavery risk in our investments



We have repeated our manager engagement and assessment this year and continued to follow-up with managers who previously had not responded, although pleasingly this was a small minority, with managers seemingly more familiar now with the detailed information we are requesting from them on modern slavery risk, with better-prepared and more timely responses. With the Statewide merger in early May 2022, we have also had the opportunity to assess a number of managers new to Hostplus.

Based on responses received and reviewed to date from existing and new managers, we have not identified any material changes to the risk exposures in the portfolio, although have noted some progress with regard to the risk identification and management approach taken by managers. The outcome of the analysis is summarised in the following table by asset class and indicates the following risk areas:

- Australian equities listed
 Australian companies with
 operational or supply chain
 exposure to high-risk countries,
 sectors, employment practices
 and business models
- International equities listed international companies with operational or supply chain exposure to high-risk countries, sectors, employment practices and business models
- Property cleaning, security and construction associated with property assets and a small number of assets located in highrisk countries
- Infrastructure transport, warehousing and construction associated with infrastructure assets and a small number of assets located in high-risk countries
- Fixed income government bonds of high-risk governments
- **Credit** private credit exposure to high-risk countries and sectors.



Asset Class	Risk Level	Manager Approach	Risk Summary
Australian Equities	Moderate	Hostplus' Australian equity managers previously had in place basic modern slavery mitigation processes, but this year we have seen some positive steps, particularly in the development of Modern Slavery policies. Almost all incorporated modern slavery within their responsible investment policies, were explicitly factoring modern slavery risk as a part of investment due diligence, undertook significant company engagement and drew on external data sources.	Risk is focussed on a limited number of Australian listed companies that have operational or supply chain exposure to high risk countries, sectors, employment practices and business models. These include mining and energy companies with operations in high risk countries, the major supermarkets and their listed suppliers through exposure to food supply chains, and companies with supply chain exposure to timber, cotton and rubber. Almost all such listed companies are themselves subject to Australia's Modern Slavery legislation.
International Equities	Moderate	Some investment managers demonstrated an industry leading approach to identification and management of modern slavery risk, while others focussed only on financially material labour risks or provided limited information and risk assessment.	Risk relates primarily to the supply chains of companies headquartered in lower risk geographies but that through their supply chains have exposure to high-risk sectors such as electronics manufacturing, mining (particularly conflict minerals) and apparel. There is also a small exposure to companies headquartered in high-risk countries.
Private Equity	Low	These companies are generally smaller, tend to be earlier in their development and are unlikely to have direct obligations under Modern Slavery legislation. As a result, their policies and processes are often less developed but their operations and supply chains are also significantly less complex. Hostplus' private equity portfolio has a strong innovation and technology focus and therefore has less exposure to use of unskilled labour which is at higher risk of modern slavery.	While risk is generally low, there is a small exposure to high-risk countries.
Property	Moderate	Hostplus' property portfolio is heavily weighted to Australian property managers, who we had assessed as having implemented robust modern slavery risk assessment processes. A number of these managers involved in significant mitigation practices including implementation of the sector's Informed 365 Modern Slavery prequalification program and participation in initiatives such as the Cleaning Accountability Framework. We have also now undertaken a risk assessment of our international property managers (predominantly US-based), whose risk management processes and policies are slightly less-developed but the risk exposures are not considered to be high.	Risk relates primarily to cleaning, security, maintenance and facilities management and construction. This risk is somewhat mitigated by property assets being located in lower risk countries, predominantly Australia and the US. There are a small number of assets located in high-risk countries.
Infrastructure	Moderate	Assessment had previously focused on Hostplus' major infrastructure managers, who have implemented robust modern slavery risk management processes. Smaller infrastructure managers have also now been captured in our review, who typically had low risk exposure and appropriate risk identification and mitigation processes.	Risk relates primarily to transport, warehousing and construction. This risk is somewhat mitigated by infrastructure assets being located in lower risk countries, predominantly Australia, the US and UK. There are a small number of assets located in high-risk countries.
Fixed Income	Moderate	Hostplus' fixed interest investments are passive (index-following).	Risk relates primarily to exposure through global bonds to high-risk governments through government securities.
Credit	Moderate	Hostplus' credit investments are largely structured credit which, like alternatives, use financial instruments only. Hostplus has a smaller exposure to private debt.	Risk relates primarily to small private debt exposures in high-risk countries and high-risk sectors.

Engagement with companies via specialist service providers

Through research, engagement, advocacy and voting recommendations, ACSI and EOS supports Hostplus to exercise active ownership. This strengthens investment outcomes for our members through genuine and permanent improvements to the environmental, social and governance (ESG) practices of the companies in which we invest. The engagement that ACSI and EOS conduct on behalf of Hostplus ensures that companies are encouraged to continually improve their ESG practices, which includes their approach to identifying and managing the risks of modern slavery. Engagement outcomes may include addressing particular modern slavery risks identified within a company's supply chain or improved disclosure on the risks companies are exposed to, which ultimately helps Hostplus identify and manage the overall exposure to modern slavery risk within our investment portfolio.

Hostplus' engagement with Australian companies through membership of ACSI

ACSI provides a strong voice on financially material ESG issues.

ACSI conducts a year-round engagement program with ASX300 company boards and executives on material ESG issues and pursues a priority work program on behalf of its members such as Hostplus. As an ACSI member, Hostplus has an active input into ACSI's priority engagement themes and target companies each year. Workforce issues, including modern slavery in supply chains, is one of ACSI's engagement priorities.

In FY22, ACSI held 74 meetings with 63 ASX300 companies where modern slavery and supply chains were discussed.

Modern Slavery Act reporting

Now into the third year of the Modern Slavery Act reporting regime, ACSI continues to be encouraged by further improvements in how modern slavery risks are identified, managed, and disclosed by listed companies. ACSI has identified that companies are increasingly adopting stronger policies and undertaking efforts to demonstrate the overall efficacy of their respective approaches towards mitigation of human rights related risks in supply chains and operations. Nonetheless, there remains significant opportunity for many companies to adopt more robust practices in this area. Accordingly, ACSI will continue to prioritise engagement with companies that are materially exposed to modern slavery and other human rights related risks to encourage further improvements.

You can read more about ACSI's engagement with companies in ACSI's 2021 Full-year Engagement Report on Hostplus' website.

Hostplus' engagement with international companies through EOS

Hostplus has appointed EOS, a leading stewardship service provider offering specialist capability in responsible investment with global reach.

EOS' engagement activities enable long-term institutional investors such as Hostplus, to be more active owners of their assets through dialogue with companies on environmental, social and governance issues.

Human and labour rights are a priority theme within EOS' engagement program with international companies, including assessing exposure to various forms of modern slavery risk.

In FY22, EOS engaged with 598 companies within Hostplus' international equities portfolio on 837 specific engagement objectives, which includes modern slavery, as part of its core engagement program.

You can read more about EOS' engagement with companies in EOS' 2021 Annual Review – Engagement Highlights Report on Hostplus' website.



Looking forward

The Boards and senior management of the companies within our supply chain with whom we engage are best positioned to detect, prevent and rectify Modern Slavery practices within their operations and supply chains. As a super fund with significant outsourcing of both operational and investment activities we believe our role is to:

- Conduct periodic Modern Slavery risk assessments in relation to our supply chain and investment portfolio
- Design and practice appropriate escalation and Remediation actions where suppliers are unable to meet Hostplus expectations
- Continue to play a role in making a positive change to labour rights practices both at a
 company/asset level and broader industry and regional level primarily through engagement
- Monitor progress on commitments and achievements.



Looking forward



Looking forward, our priorities will evolve from risk assessment to embedding strong labour practices within our operations, supply chain and investments. We have the following priorities moving forward:

Governance and Policies	 The implementation of the Governance, Risk and Compliance (GRC) tool will provide capability to build robust and systematic third party risk oversight as part of Hostplus' Risk Management Framework Design and implement a Modern Slavery Procedure to provide the organisation further guidance about the management of Modern Slavery risk.
Assessments	 Continue strong engagment with our suppliers via risk-based annual assessments and automate assessments where applicable through the GRC system.
Training and awareness	 Develop internal training and communication to assist staff in taking appropriate action where modern slavery risks are suspected or identified Engage with our suppliers to ensure they are well equipped to identify and manage the risks associated with modern slavery.
Assessing effectiveness	 Ongoing review of the effectiveness of our program through review of our Third Party Management Framework as part of the Hostplus assurance plan.
Grievance and remediation	 Enhance grievance and remediation processes to address modern slavery incidents that arise.
Investments	 Continue to engage with listed companies regarding modern slavery and broader workforce issues, particularly those identified as being higher risk, through our specialist service providers ACSI and EOS Continue to review risk assessments and engage further with investment managers as required to understand their approach to addressing modern slavery risk within their respective investments.



This statement was approved by the Board of Host-Plus Pty Limited in its capacity as trustee of the Fund and in its capacity as trustee of the PST on 2 December 2022. Damien Frawley, Chair of the Board.

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Damien Frawley Chair of the Board



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