Modern Slavery Statement 2025

Introduction

ANZ Staff Superannuation (Australia) Pty Limited (AFSL 238268, RSEL L0000543) (the Trustee) is the corporate trustee of the ANZ Australian Staff Superannuation Scheme (the "Scheme"). The Trustee is committed to maintaining the highest standards of corporate governance practices and ethical conduct in undertaking its responsibilities to manage the Scheme on behalf of its members. The Trustee condemns slavery and abuse of human rights. We recognise that modern slavery is a serious global issue and acknowledge our responsibility to identify, assess and prevent the risk of modern slavery practices within our operations, supply chains and investments.

Modern slavery refers to situations where individuals are deprived of their liberty through coercion, threats or deception, and includes trafficking in persons, slavery, servitude, forced labour, debt bondage, forced marriage, deceptive recruiting for labour or services and the worst forms of child labour.

This Modern Slavery Statement (the Statement) is made pursuant to the Modern Slavery Act 2018 (Cth) (the Act) and covers the reporting period from 1 January 2025 to 31 December 2025. Refer to Appendix 1 for a summary of the key regulatory requirements.

The Trustee Board has oversight of modern slavery risks as part of its broader risk management and governance responsibilities and has approved this Statement.

Reporting entity

ANZ Staff Superannuation (Australia) Pty Limited is the Trustee of the ANZ Australian Staff Superannuation Scheme (RSE R1000863) (ANZ Staff Super). The Trustee does not own or control any other entities and operates solely within Australia.

While the Trustee is a non-controlled subsidiary of ANZ Group Holdings Limited (ANZ), ANZ Staff Super operates independently. Where relevant, ANZ policies, tools and expertise are leveraged to support the identification and management of modern slavery risks.

Our structure, operations and supply chains

Structure and operations

ANZ Staff Super is a non-public offer superannuation fund established in 1987 to provide superannuation and retirement benefits to current and former employees of ANZ and associated companies, and their partners. As at 31 December 2025, ANZ Staff Super had approximately 28,000 members and pensioners and managed assets of approximately $7.977 billion.

The Trustee's Board is responsible for the operation and management of ANZ Staff Super, including the approach to environmental, social and governance (**ESG**) considerations. The Board has eight Directors, with equal representation from ANZ appointees and member-elected Directors. The Board is supported by Board committees and a management team responsible for day-to-day operations.

The Board is assisted in its role by the following committees:

ANZ Staff Super Board

- Investment Committee
- Risk, Audit & Compliance Committee
- Member Experience Committee
- Claims Administration Committee
- People & Culture Committee (ANZ)

Denotes ANZ Committee

The management team is comprised of employees based in Australia and operates within the financial services sector, which is generally assessed as having a comparatively low inherent risk of modern slavery.

Supply chains and service providers

ANZ Staff Super delivers its services primarily through outsourced arrangements with specialist third-party service providers. Key outsourced services include:

- administration and member services;
- accounting and audit services;
- actuarial and taxation advisory services;
- legal advice;
- custodial and fund accounting services;
- asset consulting services;
- life insurance and income protection arrangements; and
- investment management.

In addition, ANZ provides essential internal support services to the Trustee, including technology infrastructure, internal audit services, premises and procurement support.

All of ANZ Staff Super's service providers employ skilled professionals in regulated industries. Our primary service provider, being our administration and member services provider, is contractually required to comply with the ANZ Supplier Code of Practice (SCOP), which sets expectations in relation to governance, human rights and labour practices, workplace health and safety, ethical conduct and environmental management.

Investments

ANZ Staff Super's investments are managed by external investment managers, primarily through pooled investment vehicles. Asset classes include Australian and international equities, fixed interest, property, infrastructure, private credit, cash and alternative investments.

Modern slavery risks

ANZ Staff Super takes all reasonable steps to identify, monitor, manage, and prevent financial and non-financial risks arising from ESG issues associated with our business, supply chains, and our employees, including modern slavery. ANZ Staff Super views modern slavery as a subset of the broader ESG risks, which it classifies as a material risk category in relation to its business strategy and operations. ANZ Staff Super continues to refine its approach to the management of ESG risk and reviews its risk appetite and tolerances on a regular basis.

Operations

Given that ANZ Staff Super operates exclusively in Australia, employs professional staff, and is subject to strong legal and regulatory frameworks that protect workplace rights, the Trustee considers the risk of modern slavery occurring within its own operations to be low.

Supply chains

ANZ Staff Super's Service Provider Management Policy and Service Provider Monitoring Framework define our processes when procuring services from external vendors and incorporates various vendor oversight activities. These processes are designed to ensure that procurement is carried out in a manner that:

- mitigates risks associated with supplier engagements, including legal, regulatory, business, financial and material fourth party risks, and ANZ Staff Super's oversight of those engagements;
- promotes the highest standards of ethical business conduct; and
- instils member and employee confidence in ANZ Staff Super.

Most of ANZ Staff Super's service providers are Australian-based and operate within professional services sectors with limited reliance on vulnerable labour. On this basis, the risk of modern slavery within the immediate supply chain is assessed as low. Some indirect risk may arise through extended or global supply chains of service providers.

Investments

Modern slavery risks associated with investments may arise through indirect exposure to jurisdictions or industries with higher prevalence of labour exploitation. These risks are mitigated through the Trustee's investment governance arrangements and oversight of external managers, rather than through direct operational control. The Trustee recognises that certain investment exposures, including investments in offshore markets or higher-risk sectors, may present an indirect risk of modern slavery.

Consideration of ESG factors, including human rights and modern slavery risks, forms part of the Trustee's Investment Governance Framework (IGF). In 2025, ANZ Staff Super developed a new Sustainability Policy, which sets out the principles and commitments that direct its approach to ESG matters that impact investments, including modern slavery. The Policy forms part of the IGF and is supported by ANZ Staff Super's Investor Climate Action Plan. External investment managers are expected to maintain policies and processes that identify and manage ESG risks consistent with regulatory obligations and published disclosures.

Our external investment manager selection and oversight processes seek to ensure that external investment managers have both the ability and governance practices required to identify and mitigate the risk of modern slavery. When reviewing new external investment managers, alongside direct consultation with ANZ Staff Super's Investment team to understand the consideration of ESG risks in their investment processes, specific due diligence includes the review of:

- operational due diligence assessments;
- external asset consultant ESG ratings;
- any ESG, modern slavery and sustainability policies that may be available; and
- responses to ANZ Staff Super's onboarding questionnaire that includes ESG matters, including modern slavery.

In May 2025, all ANZ Staff Super's external investment managers completed a questionnaire which included questions about modern slavery. This was done to gain further insights into how these external investment managers assess the risk of modern slavery within their own operations, investment processes and supply chains.

Key insights from the questionnaire include the following:

- 92% of external investment managers reported having a modern slavery or human rights policy and/or statement; and
- 76% of external investment managers confirmed having a supplier code of conduct that explicitly prohibits forced labour, human trafficking, and child labour.

Ongoing monitoring of investments

ANZ Staff Super regularly engages with its external investment managers to discuss ESG-related matters, including modern slavery risks. Ongoing engagement is important, given that modern slavery and other ESG factors are often long-term in nature or evolve over time.

ANZ Staff Super regularly reviews and monitors its ESG risk as it relates to investments, of which modern slavery is a key consideration.

Actions taken to assess and address potential modern slavery risks

Due diligence and risk assessment

During 2025, ANZ Staff Super continued to assess modern slavery risks as part of its broader ESG risk management processes. This included:

- screening all service providers for ESG-related risks using the RepRisk ESG Risk Platform, that captures and quantifies a company's risk exposure to the countries and the sectors in which the company has been exposed to risks. Reporting includes consideration of alleged breaches of the United Nations (UN) Ten Principles of the UN Global Compact;
- reviewing external investment managers' and Material Service Providers' approaches to modern slavery through completion of a questionnaire;
- confirming contractual alignment with the ANZ SCOP for its largest supplier through an annual SCOP questionnaire and attestation; and
- reviewing its risk management framework, including ESG risks.

Modern slavery risk considerations are also incorporated into procurement and contract renewal processes for service providers.

Remediation

ANZ Staff Super has established processes to respond to risk and compliance incidents, including modern slavery incidents. Any identified incident is recorded in the Trustee's incident register and addressed in accordance with our policies. This includes investigating the matter, engaging with the relevant supplier or investment manager to seek remediation, and escalating the issue through the appropriate governance channels. Termination of a relationship may be considered where a matter is deemed to be significant, or the supplier's remediation is deemed inadequate.

Assessing effectiveness

ANZ Staff Super recognises that assessing the effectiveness of actions taken to address modern slavery risks is an evolving and ongoing process.

Effectiveness during the reporting period was considered across the following themes:

Awareness and training

ANZ Staff Super works to build employee awareness of modern slavery through mandatory and optional training resources. The "Modern Slavery – The Basics" online training module is available to all staff and contains information about possible modern slavery red flags, risks and responses and the ways that concerns can be escalated.

Management and staff completed mandatory non-financial risk training in 2025, covering areas such as:

- Code of Conduct
- Risk management
- Whistleblowing
- Anti-bribery and corruption
- Anti-money laundering and counter terrorism financing
- Fraud; and
- Occupational Health and Safety.

This training is required to be completed at onboarding and on an ongoing basis.

Modern slavery and broader ESG awareness resources and training modules are available to employees through the ANZ internal intranet.

Governance and policies

ANZ Staff Super has an established suite of policies that are relevant to identifying, assessing and addressing human rights issues, including modern slavery as follows:

- Code of Conduct
- Sustainability Policy* (IGF)
- Risk Management Framework
- Compliance Policy
- Anti-Money Laundering and Counter-Terrorism Financing Policy
- Whistleblower Policy
- Service Provider Management Policy
- Complaints Handling; and
- Human Resources, including Recruitment.

The ANZ Staff Super Whistleblower Policy supports employees, officers, suppliers and other relevant parties to raise any concerns, including a suspected or actual breach of the Modern Slavery Act 2018. The whistleblower reporting process includes a specific legal obligation to safeguard anonymity and protect a reporter's identity. Internal employment practices are governed by policies that establish working conditions, including fair pay. These policies ensure compliance with all relevant employment legislation, including the Fair Work Act.

ANZ Staff Super reviews its policies via its periodic policy review process, which includes consideration of any relevant ESG regulatory developments. Compliance with policies continues to be monitored through audits, control testing and management processes and systems that are monitored and overseen by the Trustee's Risk, Audit and Compliance Committee and the Board. The RepRisk tool and the ANZ SCOP questionnaire complement policies and processes to assist with the identification and mitigation of modern slavery risk in our supply chains.

Reporting and incident management

Potential compliance or risk incidents, including modern slavery concerns, must be reported through established reporting channels, which includes escalation protocols for investigation, oversight and remediation as applicable.

*A new Sustainability Policy was developed in 2025, which sets out our principles and commitments that direct our approach to ESG matters that impact investments, including considerations such as modern slavery.

Consultation

As ANZ Staff Super does not own or control any other entities, formal consultation with other reporting entities is not applicable. The Trustee has, where appropriate, drawn on ANZ frameworks, tools and expertise to support its approach to managing modern slavery risk.

A review process was undertaken to prepare this statement prior to the Trustee Board's approval, including by senior management, risk and compliance, and the Risk, Audit and Compliance Committee of the Board.

Improving our response over time

To improve our approach to assessing and addressing the risk of modern slavery occurring in our operations, supply chain or investments, in 2026 ANZ Staff Super intends to:

- continue to reinforce a culture of zero tolerance for modern slavery;
- continue to monitor the regulatory landscape in Australia as the Government consults on reforms to strengthen the Modern Slavery Act 2018 (Cth);
- take appropriate steps to address any potential modern slavery practices within our supply chains that we become aware of;
- engage with our service providers to continue to raise awareness and improve our understanding of the potential risk of modern slavery practices in our supply chains;
- continue to provide training to our employees and officers to build awareness and identify modern slavery risks, including the completion of specialised training on modern slavery risks for nominated roles/functions;
- deliver whistleblower awareness training to Board members;
- continue to review our policies and processes for ESG considerations, including modern slavery, and update them where necessary; and
- continue to engage with other organisations (including ANZ and subject matter experts) to further improve our understanding of the potential risk and continue to develop our approach to managing modern slavery risk.

Approval

This Statement was approved by the Board of ANZ Staff Superannuation (Australia) Pty Limited on 23 June 2026.

Jocelyn Furlan

Jocelyn Furlan
Chair
ANZ Staff Superannuation (Australia) Pty Limited
23 June 2026

Appendix 1

This statement was prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act. The table below identifies where each criterion is disclosed within the different sections of the statement.

Modern Slavery Act Criteria	Modern Slavery Statement 2025
Identify the reporting entity	Reporting Entity – overview (p.1)
Describe the reporting entity's structure, operations and supply chains	Our structure, operations and supply chain (pp.1-2) • Structure and operations • Supply chains and service providers • Investments
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Modern Slavery Risks (p.2) • Operations • Supply Chains • Investments
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Actions taken to assess and address risks (p.3) • Due diligence and risk assessment • Remediation
Describe how the reporting entity assesses the effectiveness of these actions	Assessing effectiveness (p.3) • Awareness and training • Governance and policies • Reporting and incident management
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation (p.4)
Include any other information that the reporting entity considers relevant	Improving our response over time (p.4)